

Crawley Borough Council

**Strategic Housing Land
Availability Assessment**

(June 2015)

Contents

		Page Number
1.	Introduction	1
	Purpose of the assessment	1
2.	Methodology	2
	Introduction	2
	Stage One: Planning the Assessment	2
	Stage Two: Identification of sites included/excluded from the assessment	2
	Stage Three: Desktop Review of Existing Information	3
	Stage Four: Site Surveys	4
	Stage Five: Assessment of housing potential	5
	Stage Six: Assessing housing potential	4
	Stage Six: Assessing whether and when sites are likely to be developed	5
	Stage Six a: Suitability	5
	Stage Six b: Availability	5
	Stage Six c: Achievability	5
	Stage Six d: Overcoming constraints	6
	Stage Seven: Assessment Review	6
3	Northern West Sussex Housing Market Partnership	7
4.	Site Surveys	8
	Sites submitted	9
	Inventory of Sites	9
5.	Housing Land Supply Position	10
	Housing Trajectory	10
6.	Housing Land Supply sites:	11
	Category A – Large Housing Sites (6-29 dwellings) with planning permission at 1 April 2015	12-43
	Category B - Small Housing sites (1-5 dwellings) with planning permission at 1 April 2015	44-45
	Category C – Local Plan Key Housing Allocations (Policy H2) (Deliverable Years 1-5, 2015/16 – 2019/20)	46-76
	Category D – Local Plan Key Housing Allocations (Policy H2) (Developable Years 6-10, 2020/21 – 2024/25)	77-82
	Category E – Local Plan Key Town Centre Opportunity Sites (Policy H2) (30+ units)	83-90
	Category F – Broad Locations (East of London Road, Town Centre, Forge Wood Residual Land)	91-116
	Category G – Suitable SHLAA sites that are ‘Deliverable’ (6-29 units)	117-122
	Category H – Suitable SHLAA sites that are ‘Developable’ (6-29 units)	123-130
	Category I – Sites that are suitable but currently undeliverable	131-146
	Category J - Sites which are unsuitable for development	147-183
	Category K – Strategic Housing Sites within the Northern West Sussex Housing Market Area	184-193

1.0 Introduction

Purpose and background to the assessment

- 1.1 The Strategic Housing Land Availability Assessment (SHLAA) is a technical study that will form part of the evidence base for Crawley's submission Local Plan 2015. The primary role of the SHLAA is:
- The identification of sites and broad locations for housing development;
 - An assessment of the housing potential of these sites;
 - An assessment of their suitability, availability and achievability, and
 - An assessment of the likely timeframe for development of these sites.
- 1.2 The SHLAA does not determine whether a site should be progressed through the local plan process as a housing allocation, nor does it automatically mean planning permission is certain. The SHLAA only carries out an assessment of sites that might be suitable for housing development and whether and when they might be developed.
- 1.3 The NPPF requires local authorities to demonstrate that they are meeting the full, objectively assessed needs for market and affordable housing in the Housing Market Area (paragraph 47) providing this is consistent with the policies of the Local Plan. Key sites which are critical to housing delivery should be identified alongside an annual supply of 'deliverable' sites to provide a five-year supply of housing measured against the local authority's housing requirement. Local authorities are also required to ensure choice and competition in the housing market. A supply of specific, 'developable' housing sites or broad locations for growth, for years 6-10, should also be identified and, where possible, for years 11-15.

2.0 Methodology

Introduction

- 2.1 The following paragraphs provide a summary of the methodology applied by the Council in preparing the SHLAA. This methodology accords with the National Planning Policy Framework (DCLG, March 2012) and the National Planning Practice Guidance on Housing and Economic Land Availability Assessment (DCLG, March 2014).
- 2.2 The NPPF identifies that local authorities should have a clear understanding of housing needs in their area and should prepare a SHLAA to establish realistic assumptions about the availability, suitability and economic viability of land to meet the identified need for housing over the plan period.¹ The National Planning Practice Guidance identifies that the assessment of sites and broad locations for housing development should cover the wider housing market area.

Stage One - Planning the assessment

- 2.3 The Council initially undertook the SHLAA internally, in liaison with two neighbouring authorities, Horsham District Council and Mid Sussex District Council, who collectively form the Northern West Sussex Housing Market.
- 2.4 To inform the study and test the findings of the assessment, a consultation database was compiled, predominately from the Local Development Framework (LDF) database and from analysing historical information to identify parties who have interacted in the development process. The broad categories of consultees include:
- National agencies i.e. the former Government Office for the South East, Forestry Commission, Homes and Communities Agency
 - House builders and the Home Builders Federation;
 - Estate Agents / Planning Consultancies;
 - Local community groups ; and
 - Major land owners within the Borough.
- 2.5 The methodology outlined in this section was originally circulated for consultation at the draft stage between the 2nd April and 30th April 2008. Six comments were received during this period, which suggested only minor amendments. In light of the comments received, the draft methodology was amended and the final version was published in May 2008.
- 2.6 Running concurrently with the consultation held on the draft methodology was the first 'call for sites'. This was held between the 2nd April and 11th July 2008 and provided the opportunity for sites to be nominated to the Council for assessment. Subsequently, there have been two further SHLAA 'call for sites' and the details of these are set out in section 4 of this report.

Stage Two – Identification of sites included or excluded from the assessment

- 2.7 The type of sites included and excluded from the SHLAA are reflective of the Borough's characteristics and constraints (See Table 2.1, below). A minimum site size threshold of six dwellings or more has been applied throughout the assessment because this is consistent with the West Sussex County Council

¹ National Planning Policy Framework, Dept for Communities and Local Government, March 2012, para 159.

and Crawley Borough Council threshold of small (1-5 dwellings) and large sites (6+ dwellings).

Table 2.1 – Site categories included and excluded from the assessment

1.) Sites in the planning process (included)
Land allocated within the Local Development Framework for housing (Policy H2 of the adopted Core Strategy)
Sites with unimplemented planning permissions
Sites with planning permission that are part implemented
Planning Applications that have been refused or withdrawn
2.) Sites not within the planning process (included)
Vacant and derelict land and buildings
Surplus public owned land (Crawley Borough Council, West Sussex County Council, NHS Estates, Homes and Communities Agency, Forestry Commission)
Land currently used for non-residential purposes i.e. commercial land
Residential land with potential for intensification of use i.e. existing dwellings and garden land
3.) Land with designations preventing housing that will not be considered as part of the assessment (excluded)
Land which is significantly affected by noise that would be unsuitable for residential development (66dBA) for significant development (100+ dwellings), 69dBA for developments of 99 units or less. ²
Land which is significantly affected by poor air quality (within the proposed Air Quality Management Area at Tinsley Lane)
Land designated as Ancient Woodland, Local Green Space.
Land within the functional floodplain (Zone 3b) as identified in Crawley's Strategic Flood Risk Assessment (November 2013)
Land within the area safeguarded from development for a second wide-spaced runway at Gatwick.

Stage Three – Review of existing information

- 2.8 Although the Council has undertaken a consultation exercise, where members of the public and those in the development industry have had the opportunity to nominate sites, a review of existing data sources was undertaken. Table 2.2 (below) provides an indication of the data sources the Council utilised in the desktop site review. Throughout the development of the Council's SHLAA, sites in the planning application system have been monitored and fed into the assessment.

Table 2.2: Existing data sources for site identification

Document title / data source
Adopted Core Strategy Development Plan Document (Policy H2 sites).
Town Centre Wide Supplementary Planning Document (May 2009) (development opportunity areas identified).
Urban Housing Potential Study (2004).
Crawley Borough Council PPG17 Assessment (2008).
Crawley Borough Council Open Space, Sport and Recreation Study (2013)
West Sussex Residential Land Availability Assessment (updated with Crawley Borough Council data on completions/permissions, 30 Sep 2014).

² The submission Local Plan Noise Annex provides clarity on the noise criteria to be applied to residential development including aircraft noise to support Local Plan Policy ENV11.

Review of residential planning application data over the last 5 years, particularly those sites where the principle of residential development was considered acceptable.
Review of aerial photography of the Borough on a neighbourhood basis.
Representations received at the Core Strategy Preferred Options stage, Submission Stage and as alternative Development Sites. Representations submitted to the Local Plan 2014 at Issues and Options, Preferred Strategy and Additional Sites Consultation (January 2012 – July 2013)
Crawley Borough Council Urban Capacity Work (September 2013)

Stage Four – Site Surveys

- 2.9 As already explained, the major source of sites came from the Council's own review of capacity, rather than the development industry. Sites were mapped at appropriate scales using Ordnance Survey base maps and the site data held within an appropriate database.
- 2.10 All sites have been visited and assessed against the criteria listed in Table 2.3 (below). This table summarises the key data collected for every site.

Table 2.3: Information to be collected and held for each site

Site Characteristics	Site Size
	Site Boundaries
	Current use(s)
	Surrounding land use
	Character of the surrounding area
Constraints	Physical constraints i.e. access, noise, ground conditions, flood risk (the Strategic Flood Risk Assessment) and ways to alleviate them, also if any contamination may be present.
	Planning policy constraints i.e. designations
	Environmental / amenity impacts i.e. effect upon landscape features / conservation areas etc.
	Conditions for potential residents i.e. would the site offer an acceptable living environment?
	Infrastructure constraints i.e. impact on highways both within and beyond Crawley.
Ownership	Land ownership / multiple land ownership and land assembly constraints
Planning Status	Planning permission / allocated
Development progress (for sites with planning permission)	Ground works complete / homes started / site built out
	Total number of units
	Units built
	Dwelling mix completed / to be completed
For sites without planning permission	Estimated number of dwellings that could be delivered on site
	Likely timescale for commencement of development

	Likely build out rate for development
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Stage Five – Assessment of housing potential (carried out concurrently with stage six)

2.11 To assist in the assessment of housing potential, the Council has reviewed any design briefs and/or densities achieved from similar sites to arrive at an estimated capacity in consultation with the Council’s Design and Historic Buildings Officer and the landowner and/or developer where relevant. Where appropriate, a density has been provided (net figure).

Stage Six – Assessment of when and whether sites are likely to be developed (carried out concurrently with stage five)

2.12 Using the information collected throughout the assessment, a view of whether the site is suitable, available and achievable has been made. The four key stages undertaken are set out below:

Six A: Suitability for housing

2.13 When deciding if a site is suitable for housing, an assessment of the current policy context, physical constraints that may limit development, potential impacts of the development on the landscape, natural environment, neighbour amenity, supporting infrastructure (i.e. strategic road network, sewerage etc), and future quality of the living environment has been made by the Council.

Six B: Assessing availability for housing

2.14 In accordance with planning guidance, for sites to be considered available within a five year period, land ownership issues need to be resolved and the site either needs to be under the control of a developer, or the landowner has indicated a clear intention to bring the site forward for development. In addition, the assessment will reflect the timescales required to overcome any constraints. In most cases, sites included within the first five years are those with full planning permission or allocated with a firm commitment by the developer/landowner to bring the site forward.

Six C: Achievability for housing

2.15 Achievability refers primarily to the economic viability of the site and the capability of the developer to deliver the site within a certain period. This part of the assessment will consider the following factors:

- Market factors – such as the effects that adjacent land uses might have on the site, attractiveness of the locality, level of market demand and projected rates of sale;
- Cost factors – such as the costs of preparing the site, whether any exceptional works are required such as highway infrastructure improvements, affordable housing provision, planning obligation costs etc;
- Delivery factors – in consultation with the developer(s), an assessment of the predicted build out rate for the site looking at historical and market information.

2.16 In order for a site to be considered achievable, and therefore deliverable, there should be ‘reasonable prospect’ that housing will be delivered on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and sell the housing over a certain period. If there is clear evidence that sites with

planning permission will not be implemented by the time the permission expires, they should not be identified as being achievable or deliverable.

- 2.17 The council, as part of its Local Plan evidence base, has commissioned a Community Infrastructure Levy (CIL), SHLAA and Affordable Housing viability assessment (2013) and update (April 2015) to determine that the general assumptions and policies contained within the Local Plan would mean that the 'deliverable' and 'developable' housing sites within the Local Plan are viable. However, it is anticipated that more detailed mitigation and cost and viability information may be required at the planning application stage if viability issues are raised.
- 2.18 Given the early stage of the economic recovery and uncertainty about the housing and financial markets in the medium to longer term, the Council has attempted to ensure that the delivery timescales for sites is realistic.

Six D: Overcoming constraints

- 2.19 If physical or planning constraints exist preventing the development of the site, an assessment of the possible ways to overcome the constraints and the timeframe for doing so, has been undertaken.

Stage Seven – Assessment review

- 2.20 Following the completion of stages one to six, a housing trajectory is produced to assess whether or not a sufficient number of sites have been identified to ensure a 5-year housing land supply (plus 5% supply buffer).
- 2.21 The former SHLAA practice guidance (DCLG, 2007) stated that should Council's not be able to identify sufficient sites to meet their housing requirement, they should consider the following options:
- To consider whether changes to the criteria used in the assessment are appropriate and if so, revisit the early stages of the assessment; or,
 - Whether or not to progress work to identify broad development locations and/or a windfall allowance.
- 2.21 This additional work has been undertaken in detail given that the council has adopted a 'supply-led' approach towards its overall housing requirement. In other words, the housing requirement identified in Policy H1 of the Submission Local Plan is informed by the identified capacity of the Borough to accommodate new housing development. The council's Housing Land Supply Paper (Topic Paper 3) provides further detail on the capacity of the Borough to accommodate the housing requirement identified in Policy H1 over the plan period.

3.0 Northern West Sussex Housing Market Partnership

- 3.1 The Housing Market Partnership (HMP) for Northern West Sussex includes housing providers across the locality together with the three local authorities of Horsham District, Mid-Sussex District and Crawley Borough Council. The HMP has had the opportunity to actively participate in the Strategic Housing Land Availability Assessment (SHLAA) process through a series of joint meetings with housing providers in 2009/2010.
- 3.2 The HMP process has provided an opportunity to debate the suitability, availability and achievability of a selection of sample sites, which were considered representative of different site categories. The HMP raised issues and provided advice about potential development at the sample sites. Whilst some of the points discussed related to site specific issues, the broader principles were consistently applied to all relevant sites within each category. These principles were applied in the absence of site-specific evidence and are only one of many considerations during site assessments.
- 3.3 The HMP was given a further opportunity to review a selection of sites to confirm that the principles were being applied appropriately and make any further comments/suggestions. The HMP agreed that the use of sample sites, followed by a larger review sample, was acceptable in terms of their degree of involvement, given the resource constraints associated with reviewing all SHLAA sites across the Housing Market Partnership area.
- 3.4 Members of the HMP were invited to a viability workshop in March 2013 to discuss the proposed methodology for the Council's viability assessment for Affordable Housing, Community Infrastructure Levy and all sites identified as suitable and deliverable/developable in the September 2012 SHLAA (<http://www.crawley.gov.uk/pw/web/PUB206688>).

4.0 Site Surveys

- 4.1 This section presents the sites surveyed by the Council. The Council has held three 'call for sites' since 2008, the first between 2nd April and the 11th July 2008, the second between the 26th August and 29th September 2008 and the third between the 7th October and 27th November 2009. The response to these was limited, and has required the Council to develop its own evidence base to assist in the identification of sites. The Council's Urban Capacity Work (September 2013) is a key piece of evidence which has enabled this process.
- 4.2 The sites submitted during the call for sites are listed below, with reference to where the site assessments can be located within the SHLAA document. Sites 48, 49 and 301 are no longer included in the SHLAA document as they are smaller sites with less than 6 dwellings which are currently being progressed through the planning system.

Table 4.1: First Call for Sites 2nd April to 11th July 2008

Site Name	Site ID
Land West of Ifield (inc. 22ha within Crawley's administrative boundary)	51
North East Sector (entire site)	286
Gas Holder Site, within the North East Sector	285
Tinsley Lane playing Fields	45
Land at Brunel Place	57
Land off Saxon Road, Worth	48
Land at Oaksworth, Worth Way	49
Cross Keys (Town Centre site)	310
Crawley Traders Market	53
Crawley Station and Car Parks	297
Three Bridges Station	11

Table 4.2: Second Call for Sites 26th August to 29th September 2008

Site Name	Site ID
5-7 Brighton Road (Bank Terrace Commercial Garage)	25
Land at Meldon / North House, Rusper Road	0
Gas Holder Site (within the NES and duplicated from 1 st Call for Sites)	285
Blaxley House, North of Worth Way	62
Flint Cottage/Kilravock	301
Land off Brighton Road / Pease Pottage Hill	47
Ifield Hall	Outside Crawley's administrative boundary

Land to the East of Ruserper Road	Outside Crawley's administrative boundary
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Table 4.3: Third Call for Sites 7th October to 27th November 2009

Site Name	Site ID
Land East of Street Hill, Worth	223
Site 1 Stephenson Way	220
Site 2 Stephenson Way	221
Site 3 Stephenson Way	222
EDF Site, Russell Way	258
Land East of Balcombe Road	259
Crossways, Balcombe Road	177

- 4.3 A further site was submitted in April 2011 which relates to the Post Office Delivery Office, The Boulevard, Crawley. This site has now been assessed as part of the land North of the Boulevard identified as Site 403. Several other sites were submitted during the Local Plan Issues and Options Consultation in January 2012, the Preferred Strategy Consultation in October/December 2012 and Additional Sites Consultation in June/July 2013. These have also been formally assessed and categorised according to their suitability for housing development.
- 4.4 An inventory of sites is presented in the document with the following order:
- A) Large Housing Sites (6-29 dwellings) with planning permission (1 April 2015)
 - B) Small Housing Sites (1-5 dwellings) with planning permission (1 April 2015)
 - C) Local Plan Key Housing Allocations (Policy H2) (Deliverable Years 1-5, 2015/16 – 2019/20)
 - D) Local Plan Key Housing Allocations (Policy H2) (Developable Years 6-10, 2020/21 – 2024/25)
 - E) Local Plan Key Town Centre Opportunity Sites (Policy H2) (30+ units)
 - F) Broad Locations (East of London Road, Town Centre, Forge Wood Residual Land)
 - G) Suitable SHLAA sites that are 'deliverable' (6-29 units)
 - H) Suitable SHLAA sites that are 'developable' (6-29 units)
 - I) Sites that are suitable but currently undeliverable
 - J) Sites which are unsuitable for development
 - K) Strategic Housing Sites (Broad Locations of search) within the Northern West Sussex Housing Market Area

5.0 Housing Land Supply & Housing Trajectory

- 5.1 The Council's Housing Trajectory (1 April 2015) provides an indication of housing land supply from planning permissions for large (6-29 units) and small (5 units or less) housing sites, Local Plan Key Housing Allocations (Policy H2) identified as being 'Deliverable' in Years 1-5 or 'Developable' in Years 6-10 and Local Plan Key Town Centre Opportunity Sites (30+ units). The trajectory also identifies SHLAA sites (6-29 units) which are considered to be suitable for residential development that are either 'deliverable' or 'developable' as well as three broad locations for development in Years 6-10 and 11-15 (land East of London Rd, the Town Centre and residual land at Forge Wood). An allowance for windfalls in Years 1-15 (55 units per annum) is also identified.
- 2.1 As of 1 April 2015, there are extant planning permissions (between 1-29 units that are not completed) for 109 dwellings which are capable of being delivered in the first 5 years of the Plan. Policy H2 (Key Housing Sites) of the Local Plan below identifies 22 sites as key to the delivery of the housing target over the Plan period. These are categorised into sites which are considered to be 'deliverable' within Years 1–5 of the Plan, or 'developable' within Years 6–10, as indicated in the council's housing trajectory. These sites have the capacity to provide 3,753 net dwellings over the Plan period (including 1,900 net dwellings at the new Forge Wood neighbourhood). Policy H2 also identifies three broad locations for housing development (land within the Town Centre but outside the Town Centre Key Opportunity Sites, Forge Wood Residual Land) and Land East of London Road) with a net capacity of 477 dwellings.
- 5.3 The Strategic Housing Land Availability Assessment identifies the potential for a further 32 net dwellings in Category G, which includes sites that are considered to be suitable and Deliverable and 64 net units from sites that are considered to be suitable and Developable (Category H). The Council's windfall allowance of 55 dwellings per annum over the entire plan period is also included in the Council's Housing Land Supply. On this basis, there is a total land supply of some 5,100 dwellings, equivalent to some 340 dwellings per annum from 1 April 2015 to 31 March 2030.
- 5.4 Every site identified within Categories C-H has been assessed to determine its viability on the basis of CIL, Affordable Housing, the proposed Climate Change and Internal Space Standard requirements. In addition to this, site specific constraints have also been factored into the viability assessment in order to demonstrate that the identified sites are viable and therefore, that the Council's Housing Land Supply is robust.
- 5.4 Appendix 1 contains an inventory of sites in the SHLAA document, grouped by site category (A-K). Appendix K assesses those sites considered to be of strategic significance in meeting the wider housing needs of the North West Sussex Housing Market Area.

APPENDIX 1