



Breezehurst Drive Playing Fields Development Brief Consultation Statement

MAY 2018

Breezhurst Drive Development Brief: Consultation Statement

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1. Consultation Approach

Formal Public Consultation:

Consultation was undertaken on the draft Breezhurst Drive Playing Fields Development Brief over an eight week period from **30th November – 25th January 2018**.

As this site is allocated by the Local Plan, the principle of its development is already established through the statutory process. Once adopted, the Brief will form a material planning consideration against which decisions can be made in relation to proposals for development of the site.

Whilst being an open public consultation, it particularly sought to provide a targeted approach to those interested individuals and organisations, and enable stakeholder influence on the detail of the Development Brief in its role as a non-statutory planning guidance document.

During the consultation period, the draft document was made publicly available on the council's dedicated webpage www.crawley.gov.uk/crawley2030devbrief and in paper copy at the Town Hall and Crawley Library during normal opening hours.

Emails were sent out to the following targeted list of interested stakeholders, notifying the start of the consultation:

- Ward, County and Borough Councillors
- Talk Bewbush
- Internal council experts
- West Sussex County Council
- Highways England
- Sport England
- Environment Agency
- Thames Water
- Southern Water
- Southern Gas Network
- NHS Sussex
- Sussex Police
- Residents who responded to the Submission Crawley Local Plan consultation in relation to the allocation of this site.

Letters were sent to addresses adjacent to the site: parts of Meridian Close, Waterfall Crescent, Douster Close, and St Sampson Road. The consultation was published on Bewbush Facebook Webpage and posters/leaflets in the Bewbush Centre and Children and Family Centre.

Reminders were sent out prior to the close of consultation to all those on the database, except those who had already responded.

Early Engagement:

Prior to the formal stage of consultation taking place, as part of the preparations and initial drafting of the consultation Development Brief meetings and discussions were held with key technical experts within Crawley Borough Council. On-going liaison with each expert has continued through the emerging draft Development Brief document.

As part of these meetings, early information was shared and comments raised were taken on board.

2. Outcome of Public Consultation

Responses were received from eleven individuals and organisations. In total, five residents local to the Breezehurst Drive Playing Fields area of Crawley responded – this includes those representations received from multiple occupants (such as family members) of the same property in a single letter each counted as a separate individual response.

A further six representations were received from organisations and private companies providing technical and specialist advice on particular elements covered by the Development Brief. The organisations that responded were: Environment Agency; Highways England; Thames Water; West Sussex County Council; Sport England; Southern Water.

Comments were received on each of the Key Policy Direction topic areas, although they varied in their levels of response rate.

Comments received are set out, verbatim, in the schedule in Appendix A and B, along with the council's response to the representations made.

The main points raised through the consultation have been summarised below under the Development Principle themes established within the Development Brief.

Development Principle 1: Residential Development

Four responses from local residents were received considering the proposed development's quantum of housing and design matters.

There was general concern from one resident that too many houses are being built in and adjacent to Crawley removing the town's natural beauty and open space.

Two residents raised concern regarding proximity of new housing to existing and believed that flats would lead to overlooking of existing residents' houses compromising residents' privacy. One resident did not want to look out onto flats or houses.

There was a concern from a local resident that the Development Brief does not provide a masterplan of the development showing where houses will be located.

Development Principle 2: Open Space Provision

Five responses were received highlighting matters in relation to open space and associated facilities as part of the development proposals. Four were received from local residents and one from Sport England.

One resident stated that the proposed housing would take Bewbush below the council's open space standards. Therefore, they believe that the development cannot take place. It was suggested that the council will need to revise its policy on open space standards so it is in line with reality.

Three residents raised concerns with the loss of the open space for formal football use and general informal amenity use, such as exercise/jogging and dog walking, due to the development.

One resident felt the proximity of the fields to where they live is essential as they are unable to walk far.

Sport England stated that it would object to the change of use of the pavilion as there is no information to justify its loss. Sport England would require any future strategic work to justify its loss to be robust, involve relevant NGBs and be in line with Sport England guidance on Playing Pitch Strategies. Sport England highlighted that they would require strategic evidence to understand which facilities could benefit

from additional investment to enhance pitch drainage and suggest an agronomist is used to ensure pitches meet required standards. Sport England cited FA mapping which shows a deficit of 3G in Crawley but if this site were to be considered investigations on suitability would be required.

Development Principle 3: Green Infrastructure

One response was received from a local resident considering the green infrastructure elements of the Development Brief who felt that the footbridge link to Buchan Country Park would be compromised with only vehicle access or crossing a very busy dual carriageway.

Application Requirements

In total, four responses were received from Highways England, West Sussex County Council and two local residents.

Traffic and Access

Two residents are concerned that there will be extra/heavy traffic one of which felt would impact safety for children where cars parked on the pavement force pushchairs into the road.

West Sussex County Council, as Local Highway Authority, confirmed that, in principle, the local highway network is capable of accommodating the traffic generated by the proposed level of development without severe capacity or safety constraints. However, this needs to be demonstrated by the applicant through the transport assessment required as part of a planning application. The transport assessment would be expected to quantify impacts and identify mitigation requirements as indicated in the Transport Assessment and Travel Plan section of the Development Brief. As part of such an assessment applicants are encouraged to discuss their proposals for access and mitigation of impacts upon the surrounding highway network at an early stage.

Highways England (HE) requested that they are consulted on a Transport Statement and set out what should be included within one. HE do not anticipate a junction assessment of Junction 11 of the M23 is needed. However, HE would need an understanding of additional trips through this junction resulting from the development site. A future increase in development at or near to this site could have a cumulative impact which would need to be considered in any further proposals.

Parking

One local resident was concerned about any overspill parking from the new development.

Air Quality

One resident queried whether air pollution had been tested as the prevailing wind is from the dual carriageway.

Flood Risk, Utilities and Drainage

Thames Water supported the requirement of a utilities and drainage assessment as part of the planning application and confirm it is important to consider the net increase in wastewater (and water supply) demand to serve the development and also any impact that developments may have off-site further down the network. On this basis, they confirm it is important the developers demonstrate that adequate wastewater (and water supply) infrastructure capacity exists on and off the site to serve the development and that it would not lead to problems for existing users.

Thames Water encourage the appropriate application of surface water control but highlight that SUDS are not appropriate in all areas for example areas with high ground water levels or clay soils which do not allow free drainage and also require

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regular maintenance to ensure effectiveness. Thames Water also recommended that developers engage with them at the earliest opportunity.

Southern Water have no comments at this time and looked forward to being kept informed of progress.

The **Environment Agency** stated that any proposed development should not result in an increase in flood risk elsewhere or to the site itself. The EA welcomed the requirement for a drainage assessment and flood risk assessment and highlighted that the flood risk team at the Local Authority should be satisfied with the content of the Development Brief.

Other Considerations

Responses were received relating to a number of other considerations:

- One local resident raised concern in relation to the development devaluing their property.
- Two local residents raised concerns regarding construction impacts particularly in relation to traffic, noise, dust, and damage to properties.
- Three local residents mentioned that it was their understanding at the time they bought their property that the land did not have plans to be built on or would never be built on.
- One local resident was concerned that the development would make the area worse exacerbating the issue of drug addicts and alcoholics gathering at the playing fields.
- One resident queried whether the soil had been tested for pollutants.

APPENDIX A: LOCAL RESIDENTS' CONSULTATION REPRESENTATIONS RECEIVED AND COUNCIL RESPONSES

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
Resident 1	<p>The proposed housing development on Breezehurst Drive playing field will take Bewbush below the council's own minimum space standards for park and recreation grounds. Therefore, the development cannot take place.</p> <p>If the development does happen, the council will have to revise its policy on space standards for park and recreation grounds so that it is in line with reality.</p>	<p><i>* new text to be inserted into the Development Brief is shown as <u>underlined red text</u></i></p> <p>The site is allocated for housing in the adopted Crawley Local Plan 2015-2030. Its proposed inclusion was debated at Local Plan Examination in March 2015 and accepted by the Inspector in his final report¹ to the council (paragraph 46):</p> <p><i>The argument that quantitative minimum standards should always be adhered to does not take into account the fact that better quality provision can increase the capacity of facilities and lead to greater participation.</i></p> <p>The current mix and amount of open space in the area provides an opportunity to reduce the provision of some types of open space to help meet housing need and in turn require new and improved open space alongside the development.</p> <p>There is a significant amount of amenity green space and natural green space for informal recreation in the local area. This, alongside the overall enhancements to open space and new provision required by the Local Plan Policy H2, justify the allocation; there will be a sufficient amount of open space, the quality will be higher and the mix of types of open space will be more appropriate.</p>
	<p>Has the air and soil been tested for pollutants, as the prevailing wind will tend to blow fumes across the site from the dual carriageway?</p>	<p>Any issues with pollutants will need to be addressed as part of a planning application in accordance with Crawley Borough Local Plan 2015-2030. Policy ENV10: Pollution Management and Land Contamination is listed as a Key Local Plan Policy on page 17 of the Development Brief. An Air Quality and Emissions Mitigation Assessment is an application</p>

¹ Inspector's Report on the Examination into Crawley Borough Local Plan 2015-2030 (November 2015) Martin Pike [Inspector's Report into the Crawley Borough](#)

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Respondent	Comments	Council's Response*
		* new text to be inserted into the Development Brief is shown as <u>underlined red text</u>
Resident 2	<p>I am writing to raise my concerns and comments following your letter dated 29 Nov 2017, in which you were bringing to our attention the intent for the Breezehurst Drive Playing Fields to become a residential development.</p> <p>Our understanding when we both our new built house at Waterfall Crescent (RH11 8WA) back in 2015, was that the destination for the land/ field opposite our property was recreational and there are no plans to build on it. We found the same information in the Breezehurst Drive Development Plan and we based our decision to buy a property facing the playing fields and not a different one, based on this information.</p>	<p>requirement, in accordance with Local Plan Policy ENV12: Air Quality. Further detail is set out on page 28 of the Development Brief.</p> <p>The Development Brief is a non-statutory planning document that informs developers and other interested parties of the constraints and opportunities presented by a site, and the type of development expected or encouraged by the Crawley Borough Local Plan.</p> <p>The Crawley Borough Local Plan, which allocates the site for housing and open space development (Policy H2), was adopted and published in December 2015².</p> <p>Prior to the Local Plan's adoption, in light of the borough's high housing need, the principle of a mix of housing and open space on this site, and the playing fields at Skelmersdale Walk, were consulted on as part of the Additional Sites public consultation (June-July 2013). This consultation attracted over 2000 questionnaire responses and 179 individual responses.</p> <p>These responses were carefully considered by the council. The area for housing and open space was reduced to only encompass the Breezehurst Drive playing fields site (removing Skelmersdale Walk playing fields from the proposed allocation), with an associated lower quantum of housing indicated and the requirement to maintain one playing pitch to the south of the pavilion. This proposal was then taken forward as part of the Submission Local Plan public consultation (Sept – October 2014).</p> <p>The Local Plan Examination took place in spring 2015, during which the site was debated in a public hearing session held by an independent Planning Inspector, appointed on behalf of central government. His</p>

² Crawley 2030: Crawley Borough Local Plan 2015 – 2030 (December 2015) CBC [Crawley 2030: Crawley Borough Local Plan 2015 – 2030](#)

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
		conclusion in his report ³ to the council, following the Examination, was that the Breezehurst Drive Playing Fields Allocation for Housing and Open Space was acceptable. The Local Plan was adopted by the council in December 2015.
	<p>However, in the light of the draft document dated 29 November 2017 we would like to have the following concerns addressed:</p> <ul style="list-style-type: none"> - could you please provide the Masterplan of the development to highlight the exact location of the building containing flats, where on the plan will the playground be located as well as other dwellings (the information is not available from your draft document available on your website); - could you please confirm when is the starting date of the entire operation (when will the construction site open); - could you please provide details on how you will protect the current inhabitants of the area from the inconvenience of having a building site next door especially in regards to noise, dust, trepidation, dirty roads from heavy traffic, etc. 	<p>The Development Brief is a planning policy guidance document for the council to consider a planning application against, rather than a development proposal. It will be for the developer to create a masterplan for the site, in accordance with the Development Brief, to be submitted as part of a planning application to be determined by the council.</p> <p>The developer is required by the Development Brief (page 28) to undertake a period of pre-submission public consultation with the local community, in order to advise and influence their design and layout of a development scheme on this site. Furthermore, a planning application would be subject to its statutory processes, including public consultation and formal consideration and decision by the Planning Committee.</p> <p>If an application is successful, it will then be for the developer to start on site which they must do so within 3 years of planning permission or the permission will expire.</p> <p>It will be a requirement, established through a planning permission, on the applicant/developer to submit details on how the site will be managed safely during construction.</p> <p>The distance between new housing and existing streets will need to be set out by the applicant as part of the planning application and meet the design</p>

³ Inspector's Report on the Examination into Crawley Borough Local Plan 2015-2030 (November 2015) Martin Pike [Inspector's Report into the Crawley Borough](#)

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
		<p>* new text to be inserted into the Development Brief is shown as <u>underlined red text</u></p>
	<p>On this point, could you please confirm what is the minimal distance between the new properties to be built and the nearest street (Waterfall Crescent)?</p> <p>Also, could you please confirm which road will be used for the heavy traffic in the area, where will the entrances to the building site be located and which streets will connect these entrances as heavy traffic from lorries could provoke trepidation and potentially affect the structure of the neighbouring properties, including ours?</p>	<p>criteria on page 13 of the Development Brief as well as the Crawley Local Plan Policies CH2: Principles of Good Urban Design and Policy CH3: Normal Requirements of All New Development (and expanded upon in the council's Urban Design Supplementary Planning Document⁴). These policies aim to minimise any impact on the amenity of nearby residents.</p> <p>Details of the roads and traffic using the site during construction will need to be submitted by the developer and agreed with the local planning authority.</p>
Resident 3	<p>We are writing with regards to the development of Breezehurst drive playing fields 2030devbrief. We live at Waterfall Crescent and our house overlooks the field.</p> <p>We are opposed to developing on the field due to the following reasons.</p> <p>The plans from our house development states there will be no further development of the field.</p> <p>We purchased this house because the road was quiet, we enjoyed the view and we liked having the field for our children to play on. We feel the development would change the dynamics of our neighbourhood.</p>	<p>The principle of housing development on the site has been established through the Crawley Borough Local Plan. This was subject to formal stages of public consultation between 2012 and 2015, as well as a formal independent examination, which included hearings held in public. The Crawley Borough Local Plan, which allocates the site for housing and open space development (Policy H2), was adopted and published in December 2015⁵.</p> <p>Prior to the Local Plan's adoption, in light of the borough's high housing need, the principle of a mix of housing and open space on this site, and the playing fields at Skelmersdale Walk, were consulted on as part of the Additional Sites public consultation (June-July 2013). This consultation attracted over 2000 questionnaire responses and 179 individual responses.</p> <p>These responses were carefully considered by the council. The area for housing and open space was reduced to only encompass the Breezehurst</p>

⁴ Urban Design Supplementary Planning Document (October 2016) CBC [Urban Design SPD](#)

⁵ Crawley 2030: Crawley Borough Local Plan 2015 – 2030 (December 2015) CBC [Crawley 2030: Crawley Borough Local Plan 2015 – 2030](#)

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
		<p>* new text to be inserted into the Development Brief is shown as <u>underlined red text</u></p> <p>Drive playing fields site (removing Skelmersdale Walk playing fields from the proposed allocation), with an associated lower quantum of housing indicated and the requirement to maintain one playing pitch to the south of the pavilion. This proposal was then taken forward as part of the Submission Local Plan public consultation (Sept – October 2014).</p> <p>The Local Plan Examination took place in spring 2015, during which the site was debated in a public hearing session held by an independent Planning Inspector, appointed on behalf of central government. His conclusion in his report⁶ to the council, following the Examination, was that the Breezehurst Drive Playing Fields Allocation for Housing and Open Space was acceptable. The Local Plan was adopted by the council in December 2015.</p> <p>The purpose of this Development Brief is to inform developers and other interested parties of the constraints and opportunities presented by the site, and the type of development expected by the Crawley Borough Local Plan.</p>
	<p>We're concerned about the extra traffic on our road, particularly with regards to the safety of our children. Parking is already an issue here including vans parking on both sides of the pavement, so I'm forced to walk in the road with a pushchair and a child.</p>	<p><u>Parking provision</u> Part of the Transport and Access criteria on page 15 of the Development Brief is to <i>“effectively integrate parking provision into the scheme layout, providing sufficient spaces for residents, visitors, and users of the sports facilities. Parking provision should be in line with adopted parking standards which are provided within the Urban Design SPD”</i>.⁷ This reflects the requirements of Local Plan Policy IN4.</p>

⁶ Inspector's Report on the Examination into Crawley Borough Local Plan 2015-2030 (November 2015) Martin Pike [Inspector's Report into the Crawley Borough](#)

⁷ Urban Design Supplementary Planning Document, Annex 1, pages 67-74 (October 2016) CBC [Urban Design SPD](#)

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
		<p>* new text to be inserted into the Development Brief is shown as <u>underlined red text</u></p> <p><u>Extra traffic and road safety</u> In line with Local Plan Policy IN3: <i>Development & Requirements for Sustainable Transport</i>, a Transport Statement will be required to assess the impact of the development on the surrounding and wider road network including public transport routes and the cycling and walking network. The scope of the Transport Statement should be agreed at the pre-application discussion stage.</p> <p>Access to the site is likely to be achievable through Waterfall Crescent, part of the recently completed development immediately north of the site. The access points and detailed design of the access routes should be discussed and approved by West Sussex County Council at an early stage to ensure safe and efficient access to the site for both new and existing residents, and should protect the residential amenity of existing residents, as far as possible. A Road Safety Audit will also be required.</p>
	<p>The plans state there will be flats, if these are opposite our house we would feel overlooked and that our privacy would be compromised. We've also planted our front garden to be suitable for the sun in its south facing position.</p>	<p>The layout and will need to be set out by the applicant as part of the planning application and meet the Design Quality criteria on page 15 of the Development Brief which reflect the requirements of the Crawley Local Plan Policies CH2: Principles of Good Urban Design and Policy CH3: Normal Requirements of All New Development (and expanded upon in the council's Urban Design Supplementary Planning Document⁸). These policies aim to minimise any impact on the amenity of nearby residents such as proximity of new houses to existing houses.</p>

⁸ Urban Design Supplementary Planning Document (October 2016) CBC [Urban Design SPD](#)

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
	The field is also widely used by dog walkers, children playing and teams playing football, including a local church group on a Saturday morning.	<p><u>Use of the field</u> The Local Plan Allocation is for Housing and Open Space. A requirement of the site is to retain the pitch to the south of the pavilion (Policy H2: Key Housing Sites⁹: extract is provided on pages 5-6 of the Development Brief). In addition to this, Skelmersdale Walk playing fields lie directly adjacent to west. This, in addition to the retained pitch, provides sufficient provision of open space for formal and informal recreation.</p>
Resident 4	<p>I am writing to express my outrage at the proposed development plans to build 65 residential houses on the playing fields opposite my home. Firstly, when my husband and I purchased our home in Buchans Mead 2 years ago we were assured by Countryside homes that the land directly opposite our home (Breezehurst Drive playing fields) was protected and therefore could NEVER be built on, however I am appalled to hear of the development plans as the premium I paid for my property was increased due to our beautiful outlook over the field, which is intended to be ruined by the monstrosity of yet more houses in the Crawley area.</p> <p>I understand that affordable and as well as social housing is a nationwide issue however the council is permitting every inch of Crawley to be built on, stripping it of any natural beauty and green space. Pease Pottage has a new</p>	<p>The principle of housing development on the site has been established through the Crawley Borough Local Plan. This was subject to formal stages of public consultation between 2012 and 2015, as well as a formal independent examination, which included hearings held in public. The Crawley Borough Local Plan, which allocates the site for housing and open space development (Policy H2), was adopted and published in December 2015¹⁰. The Crawley Borough Local Plan sets an overall housing target of 5,100 new dwellings over the period 2015 – 2030, which is only half of the predicted housing need arising from within the borough over that same period, leaving 5,000 dwellings to be met outside of Crawley, in neighbouring authority areas (primarily Mid Sussex and Horsham districts).</p> <p>The council considered the provision of housing for local residents to be of primary importance as part of the development of the Local Plan, whilst ensuring the green spaces and neighbourhood character are maintained and protected. In order to do this, a number of technical evidence studies</p>

⁹ Crawley 2030: Crawley Borough Local Plan 2015 – 2030, Policy H2, page76-81 (December 2015) CBC [Crawley 2030: Crawley Borough Local Plan 2015 – 2030](#)

¹⁰ Crawley 2030: Crawley Borough Local Plan 2015 – 2030 (December 2015) CBC [Crawley 2030: Crawley Borough Local Plan 2015 – 2030](#)

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
	<p>estate built on it, hundreds of flats have appeared from nowhere by Asda, as well as the growing expansion of Kilnwood Vale (2,500 homes, schools and village shops), it is not necessary to destroy every green space for homes. Even flats were built on the old car park for CO-OP Bewbush.</p>	<p>were commissioned, including the Open Space, Sports and Recreation Study¹¹.</p> <p>In relation to this site, prior to the Local Plan's adoption, in light of the borough's high housing need, the principle of a mix of housing and open space on this site, and the playing fields at Skelmersdale Walk, were consulted on as part of the Additional Sites public consultation (June-July 2013). This consultation attracted over 2000 questionnaire responses and 179 individual responses.</p> <p>These responses were carefully considered by the council. The area for housing and open space was reduced to only encompass the Breezehurst Drive playing fields site (removing Skelmersdale Walk playing fields from the proposed allocation), with an associated lower quantum of housing indicated and the requirement to maintain one playing pitch to the south of the pavilion. This proposal was then taken forward as part of the Submission Local Plan public consultation (Sept – October 2014).</p> <p>The Local Plan Examination took place in spring 2015, during which the site was debated in a public hearing session held by an independent Planning Inspector, appointed on behalf of central government. His conclusion in his report¹² to the council, following the Examination, was that the Breezehurst Drive Playing Fields Allocation for Housing and Open</p>

¹¹ Crawley Open Space, Sport and Recreation Study (2013) JPC Strategic Planning and Leisure Limited [LP115 Crawley Open Space, Sport and Recreation Study](#) and A Playing Pitch Study for Crawley (2013) JPC Strategic Planning and Leisure Limited [LP116 A Playing Pitch Study for Crawley](#)

¹² Inspector's Report on the Examination into Crawley Borough Local Plan 2015-2030 (November 2015) Martin Pike [Inspector's Report into the Crawley Borough](#)

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
		<p>* new text to be inserted into the Development Brief is shown as <u>underlined red text</u></p> <p>Space was acceptable. The Local Plan was adopted by the council in December 2015.</p> <p>The purpose of this Development Brief is to inform developers and other interested parties of the constraints and opportunities presented by the site, and the type of development expected by the Crawley Borough Local Plan.</p>
	<p>Crawley has limited green space for families to enjoy leisurely walks with their dogs and children. Tilgate Park offers opportunities for socialising as well as walks and outdoor freedom however the residence of Bewbush as well as Crawley enjoy the open space at Breezehurst Drive Playing fields. My children often take their bikes for a ride and walk the dog, we continuously see local football teams practicing, as well as many other residence walking their dogs and enjoying the green space running and remaining active. There is also the added benefit of the links via the footbridge to Buchan Park which would be compromised due to the development, meaning local people would not be able to access this beautiful park freely without a vehicle, or be risking their own lives crossing the very busy dual carriageway.</p>	<p>A requirement of the site is to retain the pitch to the south of the pavilion (Policy H2: Key Housing Sites: extract is provided on pages 5-6 of the Development Brief).</p> <p>In addition to this, Skelmersdale Walk playing fields lie directly adjacent to west. This, in addition to the retained pitch provides sufficient provision of open space for formal and informal recreation. Other nearby open spaces include Buchan Park for walking, and Bewbush West Playing Fields and Bewbush The Green within a ten minute walk.</p> <p>The bridge link to Buchan Country Park will be retained. Page 13 of the Development Brief includes:</p> <p><i>Take a permeable approach providing good links through the development and beyond. Of particular note is the need to provide pedestrian access immediately to and from the west of the subject site towards the playing fields/pavilion and also the bridge to Buchan Country Park, rather than residents having to exit onto Breezehurst Drive and walk around.</i></p> <p><i>Consider an eastern incline to the footbridge to enhance permeability between the site and Buchan Country Park. Access is currently via a slope from the west to the footbridge.</i></p>

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
	<p>Once again my husband and I feel it is absurd to even consider building on this land as our homes would decrease in value which is selfish, we refuse to have diggers and other machinery disrupting our tranquil family life here in Buchans Mead as well as the dust and chaos it would create during the schedule of the build as well as potential damage to the current surrounding properties.</p>	<p>The effect of development on existing house prices is not a material planning consideration.</p> <p>All new development is recognised to have an impact during construction. However, this matter would be considered as part of the Planning Application and a construction management plan would be required which could, for example, restrict hours of activity and access routes. Additional wording has been included in the Development Brief (page 29) setting this out clearly:</p> <p><u>The planning application should be accompanied by a construction management plan, setting out, for example, hours of activity and access routes. This will be a requirement through a planning condition.</u></p>
	<p>The only other open spaces to enjoy walking and cycling are Holy Trinity playing fields or Bewbush Academy playing fields both of which are owned by the educational institutes therefore are not freely available to the public. You are therefore depriving the residence of Bewbush of the ONLY open space and clean air to enjoy recreational activities with families. Making Crawley a mass produced hovel with no green spaces all down to the greed of developers, robbing residence of their right to open, green space.</p> <p>I am so truly devastated and hurt by such ridiculous suggestions my neighbours and I have come together to state that we are prepared to take the matter further should the build go ahead, we will protest and I will make any attempts to cross my property very difficult.</p>	

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
Resident 5	<p>I have received your letter regarding the draft for Breezehurst Drive playing fields. I have not long moved here approx. 2 years from Surrey and the only reason I moved to this property was because it backs onto a large playing field.</p> <p>This area is already overbuilt and looking more and more like a concrete jungle with the playing fields being the only piece of countryside we have close by other than the country park.</p> <p>I am strongly against this as I use the fields 3 times a day to walk my dog as do many others. There are many clubs which use the fields also. I do not want to be looking out onto a block of flats or houses. This estate has not long been built and there is no need for this expansion to happen. Bewbush has everything all the locals need. We have the shops, the playground and the playing fields is a big part of that.</p>	<p style="color: red; text-decoration: underline;">* new text to be inserted into the Development Brief is shown as</p> <p>The Crawley Borough Local Plan acknowledges Crawley has a significantly high housing need emerging from the existing population over the 15-year Plan period, and, due to land supply constraints, is only able to meet around half of the overall requirement.</p> <p>The principle of housing development on the site has been established through the Crawley Borough Local Plan. This was subject to formal stages of public consultation between 2012 and 2015, as well as a formal independent examination, which included hearings held in public. The Crawley Borough Local Plan, which allocates the site for housing and open space development (Policy H2), was adopted and published in December 2015¹³. The Crawley Borough Local Plan sets an overall housing target of 5,100 new dwellings over the period 2015 – 2030, which is only half of the predicted housing need arising from within the borough over that same period, leaving 5,000 dwellings to be met outside of Crawley, in neighbouring authority areas (primarily Mid Sussex and Horsham districts).</p> <p>The council considered the provision of housing for local residents to be of primary importance as part of the development of the Local Plan, whilst ensuring the green spaces and neighbourhood character are maintained and protected. In order to do this, a number of technical evidence studies were commissioned, including the Open Space, Sports and Recreation Study¹⁴.</p>

¹³ Crawley 2030: Crawley Borough Local Plan 2015 – 2030 (December 2015) CBC [Crawley 2030: Crawley Borough Local Plan 2015 – 2030](#)

¹⁴ Crawley Open Space, Sport and Recreation Study (2013) JPC Strategic Planning and Leisure Limited [LP115 Crawley Open Space, Sport and Recreation Study](#) and A Playing Pitch Study for Crawley (2013) JPC Strategic Planning and Leisure Limited [LP116 A Playing Pitch Study for Crawley](#)

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
		<p>* new text to be inserted into the Development Brief is shown as <u>underlined red text</u></p> <p>In relation to this site, prior to the Local Plan's adoption, in light of the borough's high housing need, the principle of a mix of housing and open space on this site, and the playing fields at Skelmersdale Walk, were consulted on as part of the Additional Sites public consultation (June-July 2013). This consultation attracted over 2000 questionnaire responses and 179 individual responses.</p> <p>These responses were carefully considered by the council. The area for housing and open space was reduced to only encompass the Breezehurst Drive playing fields site (removing Skelmersdale Walk playing fields from the proposed allocation), with an associated lower quantum of housing indicated and the requirement to maintain one playing pitch to the south of the pavilion. This proposal was then taken forward as part of the Submission Local Plan public consultation (Sept – October 2014).</p> <p>The Local Plan Examination took place in spring 2015, during which the site was debated in a public hearing session held by an independent Planning Inspector, appointed on behalf of central government. His conclusion in his report¹⁵ to the council, following the Examination, was that the Breezehurst Drive Playing Fields Allocation for Housing and Open Space was acceptable. The Local Plan was adopted by the council in December 2015.</p> <p>The purpose of this Development Brief is to inform developers and other interested parties of the constraints and opportunities presented by the site, and the type of development expected by the Crawley Borough Local Plan.</p>

¹⁵ Inspector's Report on the Examination into Crawley Borough Local Plan 2015-2030 (November 2015) Martin Pike [Inspector's Report into the Crawley Borough](#)

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
	Expanding the housing in this area is going to make the area worse as there is a big problem already with drug addicts and alcoholics and they all gather at the playing fields and take drugs.	<p>All new development in Crawley is required to provide or retain a good standard of amenity for all existing and future residents, and the scheme must demonstrate how the design considers reducing crime, fear of crime, anti-social behaviour and disorder.</p> <p>There is no evidence to suggest that the new development would cause an increase in crime or anti-social behaviour. Criminal activity is covered by other legislation.</p>
	<p>For me the fields is essential as I have had cancer which has weekend my leg so I am unable to walk far. If you build on the fields my closest fields would be Bewbush West and I am unable to walk that far. This is the reason I accepted this property is because it was close to everything I needed and it is wrong that 2 years later you are planning on building on the one thing all the locals use. There is hardly any countryside in Bewbush as it is.</p> <p>Please don't build on the playing fields, this won't be good for Bewbush.</p>	<p>A requirement of the site is to retain the pitch to the south of the pavilion (Policy H2: Key Housing Sites: extract is provided on pages 6 of the Development Brief).</p> <p>In addition, to this Skelmersdale Walk playing fields lie directly adjacent to west. This, alongside the retained playing field, maintains the playing fields as one of the largest in the borough at approximately 5 hectares of open space for formal and informal recreation linked to Buchan Country Park.</p>

APPENDIX B: STATUTORY AND TECHNICAL STAKEHOLDER CONSULTATION REPRESENTATIONS RECEIVED AND COUNCIL RESPONSES

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response* * new text to be inserted into the Development Brief is shown as <u>underlined red text</u>
Sport England	<p>Notwithstanding Sport England Policy, taking into account the Inspector's comments in their final report following the EIP, Sport England is now commenting on the development brief for this site as per the Inspector's recommendations. In making its assessment it consulted a number of NGBs; their comments are summarised below:</p> <p>The development brief suggests that a change of use is planned for the pavilion.</p> <p>Sport England would OBJECT to this change of use as it would potentially involve the loss of the pavilion as a facility ancillary to the playing pitch and would therefore prejudice the use of the playing pitch.</p> <p>There is no up-to-date, strategic information available to justify its loss – this pavilion has never been shown to be surplus to requirements and its loss would be contrary to NPPF paragraph 74. Sport England is aware that there are 23 football clubs consisting of 28 adult and 131 youth teams within a 3 mile radius of Breezehurst Drive. There is therefore an opportunity to ascertain if a club would be interested in playing at the ground and using the pavilion with improvements to the pitches.</p> <p>To further underline this, the document states that 'in May 2017, eight Crawley football clubs were contacted that include youth teams to establish whether there is demand for the pitches and pavilion at Breezehurst. The eight clubs were approached to discuss an opportunity to use Breezehurst Drive playing fields and changing</p>	<p>Comments setting out Sport England's guidance and NGB comments in relation to the existing evidence base are noted.</p> <p>The Development Brief does not suggest that a change of use of the pavilion is planned but does set out the policy/evidence context if such a proposal is contemplated alongside a proposal for the allocated site.</p>

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
	<p>rooms. Out of the eight clubs, three confirmed they would use the Breezehurst site with changing rooms to meet the club's growing needs dependent on cost and drainage improvements at Skelmersdale Walk Playing Fields. These were Three Bridges FC, Crawley Wasps and Crawley Utd.</p> <p>Therefore Sport England is unable to support the loss of this facility, though it is willing to discuss potential co-location options with regard to an additional use being added to the existing building/the extension of the existing building. Please note that Sport England would require any future strategic work to justify its loss to be robust, involve the relevant NGBs and be in line with Sport England guidance on Playing Pitch Strategies.</p>	<p>* new text to be inserted into the Development Brief is shown as <u>underlined red text</u></p>
	<p>With regard to the provision of enhanced pitch drainage off-site, Sport England would require strategic evidence to understand which facilities could benefit from the additional investment. An agronomist should be used to specify the required works and equipment to ensure the pitches to meet the required standards.</p>	<p>Additional evidence needed by Sport England to understand which facilities could benefit from the additional investment and the use of an agronomist to specify the works needed is noted. This is agreed and, whilst it was believed the intention of the draft Development Brief covered this, the wording has been amended to recommend the use of agronomist to specify the works/equipment needed to bring the pitches up to a sufficient standard (page 19):</p> <p>Provision of enhanced pitch drainage off-site</p> <p><u>Development Guidance:</u> <i>Development Proposals must include mitigation measures to address the loss of the open space on site by improving playing capacity elsewhere. <u>An agronomist should be used to specify the required works and equipment needed to ensure pitch</u></i></p>

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
		<p><i>* new text to be inserted into the Development Brief is shown as underlined red text</i></p> <p><i><u>capacity is increased to a sufficient standard.</u> The mitigation measures must be agreed with the council.</i></p>
	<p>In terms of 3G provision, there is a deficit of 3Gs in Crawley identified in the FA 3G mapping – however investigations regarding suitability of this site for a 3G would be required, particularly as this site may eventually be surrounded by housing.</p>	<p>Comments on 3G pitch provision are noted. The council believe this is covered in the Development Brief on page 19: “<i>detailed design would need to confirm suitability primarily in terms of space and its proximity to neighbouring housing.</i>”</p>
Highways England	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M23 motorway.</p> <p>We are pleased to note that the Development Brief requires a Transport Statement to be produced supporting any future planning application on the site. We ask that Highways England are consulted on the Transport Statement. The Transport Statement should include an assessment of future year trip generation and distribution at 10 years post planning application or the end of the Local Plan period whichever is the greater (in accordance with DfT Circular 02/2013 para 25) for the AM and PM peak hours and include movements to and from junction 11 of the M23.</p>	<p>Comments noted.</p> <p>The scope of the Transport Statement should be agreed at the pre-application discussion stage and should include consultation with Highways England. Highways England will also be consulted on the submitted Transport Statement. Reference to this has now been included under the Highways and Access (page 27) and Community Consultation (page 28) sections of the Development Brief.</p> <p>Highways and Access</p> <p>In line with Policy IN3: <i>Development & Requirements for Sustainable Transport</i>, a Transport Statement will be required to assess the impact of the development on the surrounding and wider road network including public transport routes and the cycling and walking network. The scope of the Transport Statement should be agreed with WSCC and Highways England at the pre-application discussion stage but should include detailed traffic modelling to understand the impact on the highway network in combination with other planned development.</p>

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
	<p>We anticipate that the 65 dwellings proposed at Breezehurst Drive Playing Fields will not require a junction assessment of Junction 11 of the M23, however Highways England needs to have an understanding of the additional level of trips through this junction resulting from the development site. A future increase in development at or near to this site could have a cumulative impact on M23 J11 which will need to be carefully considered in any further planning proposals.</p>	<p>Council's Response* * new text to be inserted into the Development Brief is shown as <u>underlined red text</u></p> <p>Community Consultation In addition to community consultation, targeted discussions should be held with the following key stakeholders:</p> <ul style="list-style-type: none"> • statutory consultees such as WSCC Highways, <u>Highways England</u>, WSCC Lead Flood Authority, Sport England, Natural England, Environment Agency, and relevant utility providers.
Thames Water	<p>Section 6 – Utilities and Drainage Thames Water support the requirement for a utilities and drainage assessment as part of the planning application.</p> <p>A key sustainability objective for the preparation of Local Plans and development proposals should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: <i>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: <i>“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</i></p>	<p>Support for the requirement of a utilities and drainage assessment as part of the Planning Application is noted.</p>

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
	<p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <i>"Adequate water and wastewater infrastructure is needed to support sustainable development"</i> (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>It is important to consider the net increase in wastewater [and water supply] demand to serve the development and also any impact that developments may have off site, further down the network. It is therefore important that developers demonstrate that adequate wastewater [and water supply] infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. Thames Water therefore support the requirement for a utilities and drainage assessment as part of the planning application.</p>	
	<p>Sustainable drainage With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers.</p>	<p>Comments in relation to sustainable drainage are noted.</p> <p>The Development Brief requires a sustainable drainage system to be established as part of the overall design layout for the site to enable effective drainage of surface water.</p>

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
	<p>However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SUDS not only help to mitigate flooding, they can also help to:</p> <ul style="list-style-type: none"> • improve water quality • provide opportunities for water efficiency • provide enhanced landscape and visual features • support wildlife • and provide amenity and recreational benefits. 	<p>* new text to be inserted into the Development Brief is shown as <u>underlined red text</u></p>
	<p>Section 3 Residential Development - Specific Sewerage/Wastewater Infrastructure Comments</p> <p>Given the size of the proposed development and based on the information available to date, we do not have capacity concerns.</p> <p>A drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance</p>	<p>Thames Water's request to be engaged at the earliest opportunity is noted.</p> <p>Whilst the Development Brief makes a general requirement for targeted discussions to be held with the utility providers in the Utilities and Drainage Section, page 27, it has been amended to include a more explicit reference to the need to liaise at an early stage with Thames Water as wastewater infrastructure provider.</p>

BREEZEHURST DRIVE PLAYING FIELDS DEVELOPMENT BRIEF		
Respondent	Comments	Council's Response*
	<p>of the infrastructure required to support the development in line with Section 6 –Utilities and drainage referred to above.</p> <p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution. Thames Water recommends that developers engage with them at the earliest opportunity to establish the following:</p> <ul style="list-style-type: none"> • The developments demand for wastewater/sewage treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 	<p>Utilities and Drainage</p> <p><u>Given the size of the proposed development, it is likely that upgrades will be required to the local sewerage network and these should be addressed as early as possible. It is strongly recommended that developers engage with Thames Water, as the wastewater infrastructure providers, at the earliest opportunity to establish:</u></p> <ul style="list-style-type: none"> • <u>The development's demand for wastewater/sewage treatment and network infrastructure, both on and off site, and whether it can be met; and</u> • <u>The surface water drainage requirements and flood risk of the development, both on and off site, and whether it can be met.</u>
Southern Water	<p>I confirm I have reviewed the document and have no comments to make at this time.</p> <p>We look forward to being kept informed of progress.</p>	Noted.
Environment Agency – Kent & South London	<p>It is noted and welcomed that Crawley Borough Council Policy ENV8 Development and Flood Risk is highlighted under Key Local Plan policies and relevant documents. Although the site is located within Flood Zone 1, any proposed development at the site should not result in an increase in flood risk elsewhere, or to the site itself.</p>	<p>Comments and support noted.</p> <p>The council's drainage officer, acting on behalf of the Lead Local Flood Authority, has considered the draft Development</p>

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	<p>Under Section 6 of the draft Development Brief, Flood Risk and Sustainable Drainage are highlighted as being necessary for any planning permission to address, and that a FRA is an essential requirement of any proposed development at the site, this is noted and welcomed.</p> <p>Reference is made to the presence of the Douster Brook, a designated main river, which is located on the boundary of the site. The requirement for a FRAP for works in, over, under or in proximity to the watercourse has been highlighted by the draft Development Brief.</p> <p>The Local Authority will comment on the surface water design at the site should any planning application be submitted, therefore the drainage/flood risk team at the Local Authority should be satisfied with the content of the draft Development Brief.</p>	<p>* new text to be inserted into the Development Brief is shown as <u>underlined red text</u></p> <p>Brief and his comments have been incorporated into the document.</p>