

Topic Paper 3

Housing Land Supply

for the Crawley Borough Local Plan 2015-2030

November 2014



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1.0 Introduction

- 1.1 The purpose of this topic paper is to provide a summary of the technical information supporting the council's approach to housing delivery which is detailed in the submission Local Plan policies:
- H1 Housing Provision; and
 - H2 Key Housing Sites.
- 1.2 Justification for the council's approach to housing delivery is provided herein, and concludes that this approach meets the soundness tests¹ of the National Planning Policy Framework (NPPF) for Local Plan preparation since:
- The Local Plan has been positively prepared and has sought to meet as much of the objectively assessed housing need within the administrative boundaries of Crawley, so far as is reasonable and consistent with other Local Plan policies that contribute to the sustainable development of Crawley.
 - Both the housing target and delivery strategy for housing is justified and represents the most appropriate strategy when assessed against all reasonable alternatives (see the Sustainability Appraisal²), particularly in view of the physical, environmental and administrative constraints of the borough.
 - The housing delivery strategy is effective and deliverable over the Plan period up to 2030 and will continue to address cross-boundary strategic priorities, such as housing delivery.
 - The housing delivery strategy is consistent with national planning policy and will enable the delivery of sustainable development in accordance with the policies contained within the NPPF.
- 1.3 This topic paper should also be read in conjunction with the following evidence base documents published to support the Local Plan:
- Housing Implementation Strategy (CBC, November 2014) Core Document Library Reference: LP007
 - The Strategic Housing Land Availability Assessment (CBC, November 2014) Core Document Library Reference: LP079
 - The Housing Trajectory (CBC, 30 September 2014) Core Document Library Reference: LP080
 - The Urban Capacity Study (CBC, 2013) Core Document Library Reference: LP090

Planning Policy Context

- 1.4 The National Planning Policy Framework (NPPF) contends that the Local Plan should meet, in full, the objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in the NPPF³. In addition, local planning policies should identify key sites that are critical to delivery of the housing strategy, and identify and update annually a supply of specific deliverable⁴ sites sufficient to

¹ Paragraph 182, NPPF, 2012

² Crawley Borough Council Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Submission Local Plan (CBC, November 2014) Core Document Library Reference LP003

³ Paragraph 47, NPPF, 2012

⁴ To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable (NPPF, 2012, Para 47).

provide five years' worth of housing against the locally derived housing requirement. The LPA should also identify a supply of specific, developable⁵ sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

Crawley Borough Local Plan 2015–2030

- 1.5 The borough is heavily constrained by its administrative boundaries, which in most parts of the borough do not extend significantly beyond the built-up area and the presence of Gatwick Airport also renders a significant amount of land to the north of the borough unsuitable for residential development. The housing target identified in Policy H1, therefore, represents a 'supply-led' requirement, and reflects the compact nature of the borough, its limited land availability, the high housing need⁶ and the significant environmental, airport noise and safeguarding constraints. The constraints of the borough are outlined and explained in Section 3 of this paper.

Table 1: Local Plan Vision and Objectives for Housing Land Supply

Local Plan Vision for Housing Land Supply	
Crawley 2030: A Vision	<p><i>Crawley will be a modern, vibrant town that stands proud of its achievements and uses its strengths to reach its potential. Its strong and diverse communities, neighbourhood structure, sustainable economic growth and excellent connections within and beyond the region will make it a place that people enjoy and want to live, work and visit.</i></p> <p>Living in Crawley: <i>By 2030, about 5,000 new homes will have been built to support the needs of the growing population. A mix of new homes will be designed for residents in all stages of life. These will be built in locations which respect the town's unique development and design principles and preserve the most valued of the town's environmental features.</i></p> <p><i>Local communities will be directly involved in planning how the town grows and develops in order to achieve the best outcome for all concerned; particularly where difficult choices have to be made.</i></p> <p><i>Neighbourhoods will continue to feature in the development of the town, recognising the important role they play in helping shape and develop communities.</i></p>
Local Plan Objectives	
Objective 5	To meet as much of the agreed housing need as possible within the borough boundary, in light of constraints; by supporting the delivery of 334no. homes each year from 2015 to 2030.
Objective 6	To provide a good choice of well designed housing in terms of tenure, type, size and location.
Objective 7	To ensure that 40% of new housing development is affordable.

- 1.6 For housing delivery, the Local Plan has a major role in terms of allocating key sites for housing development (in Crawley, this has been assumed as constituting developments of over 30 dwellings) to meet the objectively assessed housing needs of the borough. The Forge Wood neighbourhood constitutes almost half of Crawley's identified housing land supply (1,900

⁵ To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged (NPPF, 2012, Para 47).

⁶ Explained in detail in Topic Paper 2: Housing Need (CBC, November 2014) Core Document Library Reference LP011

dwelling), but the remaining smaller housing sites still constitute a significant part of supply. In addition, the Local Plan also identifies the number of dwellings that are required to be built over the Plan period in meeting as much of the authority's objectively assessed housing needs as constitutes sustainable development.

Progressing the Local Plan

Issues and Options Consultation

- 1.7 In November 2007, Crawley Borough Council adopted its Core Strategy (revised in 2008), which provided the spatial vision, objectives and the spatial development strategy for Crawley. The council then began work on preparing the successor to the Core Strategy in 2009, named at that time as the 'Core Strategy Review (now known as the Local Plan). In 2009, the council published 13 non statutory consultation topic papers covering a number of important issues, including housing. At this time, the council, in planning for new homes, was required to follow national and regional policies. Once adopted, the South East Plan stipulated that 7,500 new dwellings should be completed in Crawley between 2006 and 2026, equating to 375 dwellings per annum. This figure was compounded by the former PPS12 stating that plans should demonstrate an approximate 10% contingency, which increased the figure to be considered to 8,250 new dwellings.
- 1.8 Even prior to this early stage of consultation, the West Sussex Structure Plan⁷ long recognised that to meet such a substantial housing need, Crawley Borough Council would need to work with adjacent district councils to bring forward neighbourhoods beyond Crawley's administrative boundary. The adoption of the West of Bewbush Joint Area Action Plan⁸ (JAAP), compiled by Crawley Borough Council and Horsham District Council following this consultation, demonstrates joint-working on housing provision through the allocation of a new neighbourhood of 2,500 dwellings and associated uses.
- 1.9 The responses to consultation undertaken between May and June 2009 were limited, with 59 respondents, the majority of which were statutory consultees and/or key stakeholders. At this stage, a significant number of respondents acknowledged the importance of the North East Sector Inquiry decision on the Core Strategy, and understood the implications for the council seeking to address the South East Plan housing target.
- 1.10 Following the Issues and Options stage it was anticipated that a 'Preferred Strategy' consultation would be undertaken in the summer of 2010. However, a number of uncertainties resulted in the council needing to revisit its timetable. The updated programme took into account the Secretary of State's decision to effectively grant outline planning permission for 1,900 new dwellings at the North East Sector. This decision provided greater certainty for moving forward the preparation of a new Local Plan. In addition, the objectives and requirements of both the Localism Act and the NPPF could be reflected in the new Local Plan.
- 1.11 Subsequently, a new Local Plan programme began with an additional revised Issues and Options consultation. From 19 January to 1 March 2012, residents, community groups, businesses and other stakeholders were asked questions about the key issues facing the town now and what they would like

⁷ West Sussex Structure Plan 2001-2016, Policy LOC1 (February 2005); http://www2.westsussex.gov.uk/yourcouncil/ppri/splan/splan-2001-2016/adopted_splan_feb05.pdf

⁸ West of Bewbush Joint Area Action Plan (July, 2009) Core Document Library Reference LP088;

to see in the future. This included issuing 12 revised topic papers, including a technical housing paper⁹, reflecting the changes since 2009.

- 1.12 The responses to the consultation undertaken in early 2012 have been collated into a Local Plan Consultation document¹⁰ and a summary of respondent's comments to the technical topic paper for housing is contained within. Verbatim comments relating to this consultation can be found at Appendix 5 of the document¹¹. In summary, there were 89 respondents to the topic paper (the second most popular topic). Development on sports, recreation and/or open space was considered to be short-term in scope and it was argued the need for retaining recreational space close to their homes. Furthermore, it was contended by residents that more housing development should be directed towards the town centre.

Preferred Strategy Consultation

- 1.13 Following this stage, the council then proceeded to publish a draft Preferred Strategy Local Plan¹² that residents, businesses and other stakeholders were invited to comment upon between the 22 October and 3 December 2012. This document set out the council's Preferred Strategy for the Local Plan, and contained draft planning policies and principles to help shape the future of the town. The draft Local Plan at this point expected Crawley to identify around 240 houses to be built each year over the Plan period (equating to 3,600 dwellings).

- 1.14 The responses to the consultation have been documented in the preferred strategy consultation report¹³ published in February 2013. The town's open spaces were strongly supported by the majority of respondents as worthy of protection despite this limiting the number of houses that could be built in the future. In terms of the proposed housing annual figure, respondents had mixed views with many respondents supporting the housing figure, but with a significant minority contending that even more houses should be built, over and above the 240 dwellings per annum.

Preferred Strategy Additional Sites Allocation Consultation

- 1.15 An additional stage of consultation was held between 3 June and 1 July 2013, named the Additional Sites Consultation¹⁴, which consulted upon additional sites for development and/or protective designations. Once more, residents, businesses and other stakeholders were asked to consider a number of potential designations and allocations. This consultation was also accompanied by a number of evidence base documents, including the Open Space, Sport and Recreation Study and a Playing Pitch Study (discussed in Section 3 below). In terms of housing allocations, a number of sites not previously subject to consultation were publicised as:
- 'Proposed Allocations'
 - 'Requiring Further Work' or
 - 'Rejected'

⁹ Issues and Options Topic Paper 5: Housing; <http://www.crawley.gov.uk/pw/web/int226798>

¹⁰ Local Plan (Crawley '2029') Consultation, February/ March 2012; Core Document Library Reference: LP027

¹¹ Local Plan (Crawley '2029') Consultation, List of Appendices; Core Document Library Reference: LP027

¹² Crawley Borough Council Local Plan 2014-2029, Preferred Strategy Consultation Draft (October 2012); Core Document Library Reference: LP028

¹³ Crawley 2029 Preferred Strategy Consultation Report, February 2013; Core Document Library Reference: LP026

¹⁴ Additional Sites Consultation: Site Maps Document, June 2013;

In addition, any new sites were formally requested to be put forward for inclusion within the SHLAA as part of this stage of public consultation, and any further information and evidence was sought from landowners/developers in relation to the sites publicised.

- 1.16 An overarching summary of the consultation responses is contained within the Statement of Consultation¹⁵. In terms of new housing allocations, the loss of playing fields and open space for housing development was not popular, in particular, new housing allocations at Bewbush Drive and Bewbush West, particularly because of the small garden sizes and large numbers of children in this neighbourhood, although there was some preference for smaller housing allocations on these areas and the retention of playing fields if they were to come forward. Conversely, support was received for a number of the sites identified for 'further work' or those which had been 'rejected'. This led to further investigation on whether any of these sites could realistically be taken forward as an allocation in the submission Local Plan. This is explained in more detail under Section 3 below.

2.0 The Evidence Base for Housing Land Supply

- 2.1 The council has used a wide variety of evidence to identify its housing land supply. This evidence has been prepared by the council itself as well as by other public bodies and organisations. They relate to two broad categories: evidence for housing land supply and evidence in relation to physical and environmental constraints, although there is a degree of overlap between the two.
- 2.2 An explanation of the evidence in relation to Crawley's objectively assessed housing needs is given within the Housing Needs Topic Paper¹⁶.

Strategic Housing Land Availability Assessment (SHLAA)

- 2.3 The NPPF identifies that local authorities should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the Plan period¹⁷. The Planning Practice Guidance (PPG) identifies that the assessment of land availability includes the SHLAA and that this is a key piece of evidence in the preparation of Local Plans in supporting the delivery of land to meet identified housing needs.
- 2.4 The SHLAA has been used to identify and assess land and/or sites for their housing development potential. This includes:
- The identification of sites and broad locations potentially suitable 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 the development of these sites.
- 2.5 Whilst the assessment is an important evidence source, it does not determine whether a site should be allocated for housing development within the Local Plan. This is because not all sites considered will be suitable or deliverable for housing due to policy constraints or viability issues. The SHLAA has a role in

¹⁵ Statement of Consultation, November 2013; Core Document Library Reference: LP004

¹⁶ Topic Paper 2: Housing Needs (CBC, November 2014) Core Document Library reference: LP011

¹⁷ National Planning Practice Guidance (NPPG, 2014), Para 159

identifying the range of sites which are available to meet need. However, the role of the Local Plan is to determine which sites are considered most suitable and can be identified to meet identified housing needs.

- 2.6 Where the Local Planning Authority concludes it is unable to identify sufficient sites and/or broad locations to meet objectively assessed needs, it should revisit the assessment by changing assumptions on the development potential of particular sites including physical and policy constraints including the possibility of new settlements across the Housing Market Area. If there is clear evidence that objectively assessed housing needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the Duty to Cooperate.
- 2.7 Five SHLAA exercises have been undertaken to inform the evidence base for housing land supply and delivery. These are:
- The SHLAA for Issues and Options Consultation (May 2009)
 - The SHLAA for Issues and Options Consultation (December 2011)
 - The SHLAA for Preferred Strategy Local Plan consultation (September 2012)¹⁸
 - The SHLAA for submission Local Plan consultation (July 2014)
 - The SHLAA for the submission Local Plan Modifications (November 2014)¹⁹

SHLAA for the Preferred Strategy Local Plan (September 2012)

- 2.8 In October 2012, the council published the SHLAA document to accompany the Preferred Strategy Local Plan. This involved a comprehensive review and update of the previous SHLAA documents to inform the Local Plan and identify a locally derived housing target for the Plan period. The methodology applied by the council in preparing this SHLAA accords with the NPPF and the Strategic Housing Land Availability Assessment Practice Guidance (now revoked).
- 2.9 The assessment considered a long list of sites from eight primary ‘sources’ within and outside the planning process. There were also a small number of land use designations that would prevent housing development being considered. These site categories are tabulated below.

Table 2: Site Categories included and excluded from the SHLAA

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)
Land currently used for non-residential purposes i.e. commercial land

¹⁸ The SHLAA for the Preferred Strategy Local Plan (September 2012) published in October 2012; <http://www.crawley.gov.uk/pw/web/int228229>

¹⁹ The SHLAA for the submission Local Plan (CBC, November 2014) Core Document Library Reference: LP079

Residential land with potential for intensification of use i.e. existing dwellings
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 (including that land affected from a second wide-spaced runway option at Gatwick Airport).
Land which is significantly affected by poor air quality (within the proposed Air Quality Management Area at Tinsley Lane)
Land designated as Ancient Woodland and/or a 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.

- 2.10 After considering a long list of sites, and then reviewing the existing information, responses to each public consultation and three 'call for sites' exercises, and reviewing planning permissions/existing planning documents, site surveys were undertaken. Significantly, the major source of sites for Crawley came from the council's own review of capacity (the Urban Capacity Study²⁰). It is considered that this is due to the limited opportunities for large scale residential development within the borough boundary.
- 2.11 A view as to whether each site, with an estimated capacity of 6 dwellings or more, was suitable, available and achievable was made. In addition, if physical or planning constraints exist preventing the development of the site, an assessment of the possible ways to overcome those constraints was also undertaken.
- 2.12 The SHLAA identified specific sites within Crawley's administrative boundary for approximately 3,550 dwellings. It was anticipated at this stage that there would be the continued development of small windfall sites, although this was yet to be evidenced and included within the housing target.

SHLAA Update for the submission Local Plan (November 2014)

- 2.13 The SHLAA update for the submission Local Plan was undertaken in two stages – initially prepared to advise the submission Local Plan (July 2014 version) and was published alongside it at the statutory consultation stage (between September and October 2014); it has subsequently been reviewed and finalised, including incorporating new evidence gathered through the consultation and as it came to light through ongoing discussions with stakeholders, for the final Local Plan submission (including the proposed modifications). It continues the methodology used for the previous SHLAA (September, 2012), but incorporates the following:
- Information from West Sussex County Council's annual residential monitoring and Crawley's Annual Monitoring Report²¹ (AMR). This includes newly identified sites gaining planning permission for residential development, updating sites with extant permissions and adjusting overall housing land supply where residential schemes have been completed.
 - The inclusion of any other housing sites that were put forward by developers for consideration.

²⁰ The Urban Capacity Study (CBC, 2013) Core Document Library Reference: LP090

²¹ Crawley's Annual Monitoring Report's (AMR) from 1st April 2008 – 31st March 2014 Core Document Library Reference LP041 – LP045;

- Adapting the Local Plan timeframe from 2014-2029 to 2015-2030 in order to accommodate the revised anticipated adoption date of the Plan.
 - Ongoing reviews and amendments to site data to reflect ongoing dialogue with landowners, local agents and developers. In addition, new technical documents that have been undertaken or commissioned by the council to inform the Local Plan (most notably the Open Space, Sport and Recreation Study, May 2013, and Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment, October 2013).
- 2.14 The SHLAA accompanying the submission Local Plan feeds into the council's housing trajectory (30 Sep 2014) as a component of future housing land supply by identifying a number of smaller sites (6-29 units) that are considered 'deliverable' in Years 1 to 5 of the submission Local Plan (2015/16 – 2019/20) or 'developable' in Years 6-10 (2020/21 – 2024/25). The SHLAA also identifies three broad locations for development in Years 6-15, namely Land East of London Road, the Town Centre (outside the H2 Town Centre Key Opportunity Sites) and residual land at Forge Wood neighbourhood with a capacity of 171, 156 and 150 net dwellings. The Key Housing Sites (30+ units) identified in Policy H2 as being deliverable or developable are also analysed in the SHLAA. These sites have the capacity to deliver 3,531 net dwellings in Years 1-15 of the Plan.

Housing Trajectory

- 2.15 The housing trajectory (30 September 2014) illustrates the anticipated delivery rate of dwellings over the Local Plan period (2015-2030). In terms of the 5-year housing land supply (from 2015 to 2020) for Crawley, it is anticipated that 2,735 net dwellings will be completed, including 900 dwellings in Crawley's new neighbourhood, Forge Wood. Policy H1 (Housing Provision) of the submission Local Plan states that a minimum of 5,010 net dwellings will be built over the Plan period: averaging as a target of 334 net dwellings per annum. The 5% buffer, as prescribed by the NPPF²², increases the annual target to 351 dwellings in the first five years. The total 5-year requirement of 1,755 net dwellings can be achieved, and exceeded, based on the current trajectory.
- 2.16 As Crawley is reliant on a supply-led figure, the housing trajectory illustrates that the delivery of new dwellings is expected to reduce substantially from 2027/2028 onwards. The council cannot presently identify additional large residential development within its current administrative boundary.

Housing Implementation Strategy

- 2.17 The Housing Implementation Strategy (HIS)²³ sets out Crawley's approach to the delivery of housing within the borough from 2015-2030. As previously stated, the submission Local Plan identifies a minimum housing target of 5,010 new homes over the Plan period (2015-2030). Most notably, the document endeavours to explain the different components of the housing trajectory, outlines the 5-year housing land supply position, and considers the potential risks for housing delivery over the Plan period.
- 2.18 The HIS states that, since 2008, Crawley has overprovided against the Core Strategy target of 270 dwellings per annum; with net completions averaging

²² Local Planning Authorities should 'identify and update a supply specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land' (NPPF, 2012, Para 47).

²³ Crawley Borough Council Housing Implementation Strategy (CBC, November 2014) Core Document Library Reference: LP007

387 dwellings per year in the 3-year period between 1 April 2008 and 31 March 2011. However, in the following 3-year period (1 April 2011 – 31 March 2014), the number of housing completions has fallen²⁴ which in part reflects the economic recession during this period and the significant impact this had on the local housing market in terms of reduced delivery. However, reduced levels of delivery in the last three years is not deemed 'persistent' in the context of the NPPF and it is considered that a 5% additional buffer should for the Local Plan housing target be applied to Crawley.

- 2.19 In terms of potential risks for housing delivery, the economic climate represents the most significant external factor for the future supply of housing throughout the Plan period. Indeed, whilst the housing market is recovering at the national level, housing completions in Crawley remained low in 2013/14 (157 net), which in part reflects the fact that a number of planning permissions have lapsed or were renewed in the last two years, whilst other housing sites were built out at slower rates. Additional information on the maintenance of housing supply can be found within the HIS and in Section 5 of this report.

Windfall Housing Allowance

- 2.20 As stated in the NPPF²⁵, an allowance for windfall sites in the five-year supply should only be made if there is compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. Subsequently, the evidence base to support Crawley's anticipated windfall allowance endeavours to analyse the historic completions rates of windfall sites (from 2008 onwards) and predict the future trends in windfall housing provision within Crawley. The windfall allowance cannot include development of residential gardens²⁶, despite the fact that a substantial proportion of Crawley's windfalls (since 2008) involved redeveloped garden land (approximately one third).
- 2.21 The council's evidence on historic windfall delivery identifies that 153 dwellings were completed between the period April 1 2008 and 31 March 2013. The number of extant windfall permissions at 1 April 2014 (i.e. not previously identified in the SHLAA) is 76 dwellings. If this trend were to continue, 107 dwellings could be expected in the first five years of the Plan period (i.e. 76 dwellings p.a. from extant planning permission and 31 dwellings p.a. from historic windfall delivery), an average of 21 dwellings per annum.
- 2.22 An allowance has also been made for small windfall sites (i.e. sites of 5 dwellings or less) and prior approvals from offices to residential. This equates to 5 dwellings per annum for small sites based on historic completions and 29 units per annum for prior approvals, providing 25 units from small sites in the first five years of the Plan period and 145 units from prior approvals. This, together with an allowance for historic windfall delivery and extant windfall permissions (107 units), would provide a total of 277 windfall units in Years 1-5 of the Local Plan (55 units per annum), as shown in Table 3 below. The council's accompanying paper on Windfall Allowance provides greater detail on the component parts of the windfall figure and underlying assumptions²⁷.

²⁴ 2011/12 housing completions were 202 dwellings (net); 2012/13 housing completions were 78 dwellings (net); and 2013/14 housing completions were 157 dwellings (net)

²⁵ Paragraph 48, NPPF, 2012

²⁶ Paragraph 48, NPPF, 2012

²⁷ Establishing a Windfall Allowance for the Local Plan Period 2015-2030 (Crawley Borough Council, November 2014) Core Document Library reference: LP092

Table 3: Windfall Site Components Years 1 – 5

Extant Planning Permission (76 units) Historic Delivery (31 units)	107
Small Sites (<5 dwellings)	25
Prior Approvals	145 (50% discount)
TOTAL	277

2.23 The PPG states that councils have the ability to identify broad locations in years 6-15 which could include a windfall allowance. The Town Centre, East of London Road, and the Forge Wood (North East Sector) Residual Land have already been identified as (site-based) broad locations for future housing development as detailed in the council’s Housing Trajectory. However, it is predicted that additional windfall completions will continue to come forward in other locations in Crawley, both within and outside of the Built-Up Area Boundary, through conversion/redevelopment of office/leisure space, development of surplus amenity/garage land and conversions/sub-division and redevelopment of residential properties. It is, therefore, proposed that between 2020 and 2030 (Years 6-15 of the Plan), the same allowance (55 dwellings per annum) should be included in the council’s housing land supply, as detailed in the Housing Trajectory. Thereby providing a total anticipated windfall contribution of 825 dwellings over the Plan period 2015 – 2030.

Urban Capacity Study

2.24 The Urban Capacity Study²⁸ for Crawley’s Local Plan Preferred Strategy Consultation was published in October 2012. This document was undertaken to identify housing sites and broad locations through a desktop exercise where officers completed an initial desktop exercise to identify potential sites in all 13 neighbourhoods of Crawley using Ordnance Survey Maps and aerial photography.

2.25 Each officer identified:

- the physical and policy constraints affecting the neighbourhoods;
- the SHLAA sites which, at this stage, formed part of the council’s housing land supply;
- open space; and
- the SHLAA sites that were considered undeliverable and/or unsuitable.

2.26 In addition, a number of Crawley Borough Council-owned sites previously discounted by the SHLAA process were reassessed in terms of deliverability and suitability. Any housing or employment site promoted during the Issues and Options consultation for the Local Plan was also identified and assessed. Once the list of possible sites had been identified, site visits were undertaken to consider the appropriateness of the site for residential and/or employment uses.

2.27 The findings from each neighbourhood assessed is summarised within the urban capacity study. This includes a short statement of the main constraints

²⁸ Urban Capacity Study (Crawley Borough Council, October 2012) Core Document Library Reference: LP090

of the neighbourhood; a summary of council sites formerly removed from the SHLAA; a list of SHLAA sites within the neighbourhood; and a number of preliminary site assessments. The document concluded by identifying a number of sites which merited further investigation some of which were SHLAA sites previously considered to be unsuitable for development or suitable but undeliverable whilst others were new sites. The key policy and/or physical constraints affecting these sites were identified in order to ascertain whether any of these could be overcome.

Call for Sites and Consultation Representations

- 2.28 Representations have been received throughout the Local Plan preparation process from developers, landowners and other interested stakeholders, promoting the allocation of specific sites within the Local Plan for future residential development. Where these are considered to have a potential capacity for over 6 dwellings they have been incorporated into the SHLAA.

Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment (October, 2013)

- 2.29 The Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment²⁹ was commissioned to establish:
- an affordable housing target for the Local Plan;
 - CIL rates for both residential and commercial uses: and
 - SHLAA appraisal to consider housing delivery over a 15-year Plan period.

In general, the report provides an appraisal of the viability of Crawley's Local Plan, as well as CIL, particularly in terms of its policies on the economic viability of development proposed to be delivered by the Local Plan.

- 2.30 The residential viability testing demonstrated that, in general terms, residential developments in Crawley are viable and can accommodate reasonable levels of CIL (it recommended that £100 per sqm should be established). In terms of affordable housing, even with the recommended residential CIL rate, a 40% affordable housing target (with a tenure mix of 30% intermediate and 70% Affordable Rent) could be justified in all locations, though the viability position is marginally improved with an alternative delivery scenario of 30% Affordable Housing and 10% Low Cost Housing. The results also indicated that the Local Authority did not possess clear residential sub-markets that would warrant a differential rate approach to CIL based on geographical zones.
- 2.31 The SHLAA Appraisal considered that, based upon the proposed affordable housing target and the proposed residential CIL rate, all greenfield sites are viable across the entire Plan period. However, the delivery of a small number of brownfield sites may require either the landowners to be realistic about value reductions to take account of abnormal development costs or the council may need to consider the possibility of marginally reducing the affordable housing target for specific sites in the short term. Overall, the residential delivery strategy was considered to be sound.

²⁹ Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment (October 2013); <http://www.crawley.gov.uk/pw/web/PUB206688> Core Document Library Reference: LP008

3.0 Key Constraints Evidence Documents

Presumption in Favour of Sustainable Development and Policy SD1 of the Local Plan

- 3.1 A starting point for assessing the constraints of the borough is the presumption in favour of sustainable development as defined by the NPPF which, for plan-making, means that:
- Local planning authorities should positively seek opportunities to meet the development needs of their area;
 - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework taken as a whole; or
 - Specific policies in the Framework indicate development should be restricted.³⁰
- 3.2 Policy SD1 of the submission Local Plan outlines the presumption in favour of sustainable development for Crawley. It is considered that the Local Plan must strike a considered balance between conflicting demands to meet the Crawley's significant housing, employment, and open space needs in a sustainable manner. To ensure this is the case, Policy SD1 of the Plan states that development will be supported where it meets seven strategic objectives, including the provision for the social and economic needs of Crawley's current and future population.
- 3.3 In line with the NPPF, the presumption in favour of sustainable development should be applied unless specific policies or designations indicate that the development should be restricted. Those constraints with the strongest weight relevant to Crawley include land designated as Local Green Space, Areas of Outstanding Natural Beauty (AONB), designated heritage assets, locations at risk of flooding³¹, and areas of ancient woodland³².
- 3.4 In addition, there are a number of policies and designations that are specific to Crawley arising from the location of Gatwick Airport. This includes the designation of safeguarded land for a potential second runway, aerodrome safeguarding and noise constraints (particularly for residential development).
- 3.5 Non-designated heritage assets and locally designated nature conservation areas are afforded appropriate weight in accordance with national policy and are not believed to be an automatic or absolute constraint on development, rather as a consideration to be taken into account in the design of any proposed scheme.
- 3.6 The following section outlines the physical constraints and policies that further reduce the capacity of Crawley to accommodate its substantial housing need. The constraints will be considered as follows:
- Gatwick Airport
 - Flooding
 - Green Infrastructure
 - Infrastructure
 - Heritage and the Built Environment
 - Employment

³⁰ National Planning Policy Framework, Para 14 (DCLG, 2012)

³¹ National Planning Policy Framework, Para 100 (DCLG, 2012)

³² National Planning Policy Framework, Para 118 (DCLG, 2012)

Sites have been assessed against 'absolute' constraints and 'policy' constraints. Policy constraints in all locations have been reconsidered against the substantial high level of need and under-provision of housing and employment development and, wherever possible, solutions to these constraints (flooding, noise, air quality) have been sought to enable the delivery of sustainable development.

Gatwick Airport

Second Runway Safeguarded Land at Gatwick Airport

- 3.7 The Local Plan shows Gatwick as a single runway airport during the Plan period. However, the Plan also has to take into account the requirement to safeguard land for a second runway should it be required. This reflects the requirement originally contained in the 2003 Aviation White Paper and confirmed in the 2013 Aviation Policy Framework that land surrounding existing airports, which may be required to meet future airport needs, should be protected against incompatible development. The Airport Commission is currently assessing the location for an additional runway in the south east and is due to make its recommendation to the government in 2015.
- 3.8 The extent of land to be safeguarded for the purposes of a second runway at Gatwick Airport is contained within the Gatwick Airport Master Plan; based on the need to cater for a wide spaced parallel runway. This is reflected in the submission Local Plan (Policy GAT2), and the Local Plan Map reflects the land shown in the Gatwick Airport Master Plan. On this basis, there is no potential for new residential development currently within this location. However, whatever the outcome of the Airports Commission final recommendations in 2015, it is considered that the Local Plan will need to be reviewed to take into account the implications of the report (see Topic Paper 1: Future of Gatwick and Implications for the Local Plan).

Aerodrome Safeguarding

- 3.9 The issue of runway safeguarding should be distinguished from that of aerodrome safeguarding, which considers the impact of proposals on the operation of aircraft. Significantly, the airport operator is consulted on planning applications which fall within areas shown on the aerodrome safeguarding map. This seeks to ensure that the height, design and landscaping of new development does not interfere with the safe operation of the airport. In terms of residential development, the design of new developments throughout the borough is limited by building height restrictions, with those neighbourhoods closest to the airport (Pound Hill North, Langley Green and Northgate, which includes the town centre) most restricted. This, therefore, limits the density of residential development.

Gatwick Airport Noise Constraints

- 3.10 Policy ENV11 of the submission Local Plan relating to development and noise outlines the Local Planning Authority's position in relation to noise sensitive uses, such as residential development, affected by noise from transport sources. It states that noise sensitive uses proposed in locations that are exposed to significant noise from existing or future transport sources will be permitted where it can be demonstrated (normally through a noise impact assessment) that future users will not be exposed to unacceptable noise disturbance from existing or planned uses.
- 3.11 In the SHLAA, land unacceptably affected by noise is considered unsuitable for residential development. This is identified as being that inside the 66dBA

levels for significant development (100 + dwellings) and an upper limit of 69dBA for developments of 99 units or less. The 66dBA threshold for significant development is identified in light of the Inspector's decision relating to development at the North East Sector (Forge Wood), where it was found that development up to the 66dBA contour would not be 'unacceptable'. The upper limit of the 69dBA has been identified for other developments. The approach of the superseded PPG24 had previously allowed development up to the 72dBA contour, though up-to-date evidence identified within the Local Plan Noise Annex recognises that health impacts are triggered above the 69dBA contour and for this reason 69dBA is identified as the upper limit. In all cases, the policy approach recognises that appropriate mitigation (Planning Noise Advice Document: Sussex) will be required to ensure the amenity environment of development is acceptable in noise terms.

Flooding

Strategic Flood Risk Assessment

- 3.12 The Strategic Flood Risk Assessment³³ (SFRA) collates all the known sources of flooding in the borough and delineates areas that have a 'low', 'medium' and 'high' probability of flooding. In addition, the SFRA recommends appropriate land uses, in accordance with the sequential test³⁴, that will not unduly place people and property at risk of flooding. It is estimated that Crawley has 846 properties at a 'significant' risk of flooding (i.e. have a greater than 1% (1 in 100) chance of flooding in any one year). Only a relatively small proportion of the borough is affected by flooding from the River Mole and its tributaries and falls within Flood Zones 2 or 3.
- 3.13 The Environment Agency Flood Map for Planning has not been updated to take account of flood mitigation impacts resulting from the Upper Mole Flood Alleviation Scheme. Therefore, the SFRA takes a precautionary approach, and is drafted on the basis that all undeveloped areas or areas of open space covered by Flood Zone 3 are treated as functional floodplain (Flood Zone 3b, an annual probability of 1 in 20). In addition, developed brownfield areas falling within Flood Zone 3, are treated as Flood Zone 3a ('High Probability', an annual probability of 1 in 100). It is, however, recognised that there may be strong planning arguments (such as the overriding need to meet housing needs) for exploring whether vulnerable developments (including housing) in these areas can be made acceptable through detailed site risk assessments, design solutions and mitigation.
- 3.14 It will, therefore, where required, be necessary for the developer or, as appropriate, the council to demonstrate that development meets the requirements of the NPPF Sequential and if required Exception Tests to demonstrate how development provides wider sustainability benefits to the community that outweigh the risk of flooding. In addition, a site-specific flood risk assessment may be required to demonstrate that the development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere. Further guidance is provided in the Crawley SFRA.
- 3.15 The majority of Crawley's key housing sites, and the town centre mixed-use sites, lie outside flood risk areas. Of the sites allocated by the Local Plan for residential development, three sites are situated in areas partially affected by

³³ Strategic Flood Risk Assessment (Crawley Borough Council, August 2014) Core Document Library Reference: LP103

³⁴ National Planning Policy Framework, Para 101 (DCLG, 2012)

Flood Zone 2 and/or Flood Zone 3a; these being: Breezehurst Drive, Bewbush; Bewbush West Playing Fields (Henty Close), Bewbush and Land adjacent Desmond Anderson, Tilgate. The principle of development at each of these sites has been agreed by the Environment Agency, subject to applicants demonstrating, through a Flood Risk Assessment, that proposals are acceptable in terms of flood risk. Dialogue between the Local Planning Authority and the Environment Agency regarding the sites can be found in Appendix A. Further site-specific guidance has been undertaken in liaison with the Environment Agency and WSCC and is set out in the Crawley SFRA.

Surface Water Flooding

- 3.16 Whilst Crawley is at the highest risk of surface water flooding in West Sussex, all of the sites being proposed through the Local Plan in the Housing Trajectory and the sites in the SHLAA have been considered by West Sussex County Council drainage team in relation to the management of surface water runoff, groundwater flooding and historical river flood events. Their high level response can be found in Appendix A and shows that there are very few sites that would cause an issue from a local flood risk perspective, and then only at low risk or only small parts of the site.

Green Infrastructure

High Weald Area of Outstanding Natural Beauty

- 3.17 The High Weald Area of Outstanding Natural Beauty (AONB) lies partially within the southern boundary of Crawley's administrative area (to the south of the A264) and is a nationally important landscape. The NPPF³⁵ states great weight should be given to conserving landscape and scenic beauty in the AONB, which has the highest status of protection. It also states that planning permission should be refused for major developments except in exceptional circumstances, and should consider the need for the development, the cost of, and scope for development outside the AONB and the detrimental effect upon the environment and the extent to which this could be moderated.
- 3.18 The vast majority of the AONB within Crawley's boundaries is owned by Crawley Borough Council. The only allocation within the AONB for residential uses is a reserve Gypsy and Traveller site, which may be required in the later Plan period (years 6-15)³⁶. In this case, the need for the development is considered exceptional and Crawley's constrained urban environment has meant that the last undeveloped or underdeveloped sites have been allocated for future uses; this has resulted in high land values and limited opportunities for Gypsies, Travellers and Travelling Showpeople (GTTS) to bring sites forward themselves. Unlike the potential new bricks and mortar accommodation, the scope for developing a Gypsy and Traveller site elsewhere in the borough is considered limited – particularly due to the noise constraints in the north of the borough associated with the location of the airport. Development of the site for this purpose would involve only single-storey buildings and structures, and the policy supporting this allocation confirms that appropriate design, layout and landscaping will be required to ensure such a development satisfies the requirements of the AONB Management Plan.

³⁵ National Planning Policy Framework, Para 115 (DCLG, 2012)

³⁶ Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (CBC, August 2014) Core Document Library Reference: LP094

Countryside

- 3.19 The Built-Up Area Boundary (BUAB) review³⁷ was published alongside the Preferred Strategy Local Plan consultation (October, 2012). The purpose of the BUAB is to set a clear policy distinction between the urban area and the urban/rural fringe. Proposals should respect the different role and character of each area as set out in the Crawley Borough Council Landscape Character Assessment³⁸ and submission Local Plan Policy CH9.
- 3.20 The BUAB review concluded that some areas of land currently related more to the urban environment of Crawley than the surrounding countryside and were, therefore, recommended to be included within the built up area boundary; although this evidence did not suggest any would be suitable for built development. These recommendations were justified as follows:
- **Thomas Bennett College and K2 Leisure Centre** – These large developments strongly relate to the urban area in use and character.
 - **Breezehurst Drive Playing Fields** – The playing field is a community facility which relates well to the built-up area and the site is bounded by built form, which, combined with the flat openness of the site, gives the site an urban form. The A264 also forms a clearly defined boundary.
 - **West of Bewbush** – The area will be encompassed by built form once the new neighbourhood West of Bewbush is constructed.
 - **Cherry Lane Playing Fields South** – This area is predominantly encompassed by built form and has a defined boundary. The community use and presence of development relates well to the built up area.
- 3.21 Whilst these areas are considered part of the built up area there is no presumption that these areas would be suitable for development. However, further evidence was later gathered in preparation for the Local Plan to understand whether any of these sites were suitable for housing development.

Thomas Bennett College and K2 Leisure Centre

The area incorporated into the Built-Up Area at Thomas Bennett College and K2 Leisure Centre predominantly related to newly urbanised areas of existing development. However, a small area of the site adjacent, and contiguous, to the Core Strategy housing allocation at the former Thomas Bennett school site has been re-defined as being located within the urban area. This has allowed for the allocated housing site to be extended to include the whole site.

Breezehurst Drive Playing Fields

This site is formed of existing playing fields, requiring further consideration through the Open Space³⁹ and Playing Pitch⁴⁰, and further supplementary assessments (see Appendix B).

³⁷ The Built-up Area Boundary (BUAB) Review (Crawley Borough Council, October 2012) Core Documents Library Reference: LP056

³⁸ Crawley Landscape Character Assessment (Crawley Borough Council, October 2012) Core Documents Library Reference: LP057

³⁹ Open Space, Sport and Recreation Study (JPC Strategic Planning and Leisure, Leisure and the Environment, Crawley Borough Council, May 2013) Core Documents Library Reference: LP115

⁴⁰ A Playing Pitch Study for Crawley Borough Council (JPC Strategic Planning and Leisure, Leisure and the Environment, May 2013) Core Documents Library Reference: LP116

West of Bewbush

This site is formed of existing playing fields, requiring further consideration through the Open Space and Playing Pitch Studies, and further supplementary assessments (see Appendix B).

Cherry Lane Playing Fields South

This site is formed of existing playing fields, requiring further consideration through the Open Space and Playing Pitch Studies, and further supplementary assessments (see Appendix B).

3.22 Land outside the BUAB was not automatically discounted from scoping potential for housing development (as this was considered to be a 'policy' constraint, rather than an 'absolute' constraint). Whilst much of the remaining land within the borough boundary and outside of the defined urban area falls to the north of the town, south of Gatwick Airport and it is, therefore, subject to the constraints referred to above (paras. 3.7 – 3.11), there are some relatively small pockets of land to the south, east and west, as well as immediately to the north outside of the safeguarded land. A Landscape Character Assessment⁴¹ was undertaken to understand the character of these areas, their sensitivity to change, value and condition and guidelines/opportunities. Sites which had previously been promoted by landowners, along with sites identified through the council's own urban capacity study were subject to further public scrutiny as part of the Additional Sites consultation in June – July 2013. These sites were either highlighted as being 'subject to further work' or 'rejected' and comments were invited in relation to all, alongside a request for any other sites to be submitted. The sites consulted upon included:

- Land adjacent Langley Walk and Burlands (Further Work: Transport and Access)
- East of Brighton Road (Further Work: Transport and Access)
- Cherry Lane Playing Fields (Rejected: Access, Noise, Hub Park)
- Land at Poles Lane (Rejected: Noise, Airport, Countryside)
- Land at Meldon (Rejected: Flooding, Countryside)
- West of Ifield: Ifield Brook Meadows (Rejected: Flooding, Nature Conservation, Heritage)
- Land east of Balcombe Road (Rejected: Noise, Airport, Countryside)
- Land east of Street Hill (Rejected: Heritage)

Representations were received on each of these sites through the consultation, set out in the Appendix to the Consultation Statement,⁴² along with the council's responses. None of the above has progressed through to an allocation for residential development in the submission Local Plan. Final assessments of these sites can be found in the SHLAA and SA documents. Land adjacent to Langley Walk and Burlands has been identified as an 'Area of Search – Future Housing' on the Key Diagram (and referred to in paragraph 6.41 of the submission Local Plan), following a government decision in relation to the potential second runway at Gatwick Airport.

⁴¹ Crawley Landscape Character Assessment (Crawley Borough Council, October 2012) Core Documents Library Reference: LP057

⁴² Crawley Local Plan Consultation Statement (Crawley Borough Council, December 2013) Core Documents Library Reference: LP004

- 3.23 Three further sites had previously been promoted by landowner developers, but were considered to have capacity below the threshold for inclusion in the SHLAA and are being pursued for residential developments of between 1 – 5 dwellings directly through the Development Management process. These sites are:
- Flint Cottage, Tilgate
 - Saxon Road, Worth
 - Oaksworth, Worth

Ancient Woodland

- 3.24 Crawley has a considerable amount of Ancient Woodland within its administrative boundaries. Large areas are located at Tilgate Park; the southwest of Broadfield (Target Hill); and the northeast corner of the borough both within and outside the new neighbourhood, Forge Wood. Both the NPPF⁴³ and the submission Local Plan Policy ENV2 state that planning permission should not be granted for new development which results in the loss or deterioration of ancient woodland unless the need for, and benefits of the development in that location clearly outweighs the loss. This is because ancient woodland is a highly valued and irreplaceable habitat. As stated within the SHLAA methodology (see Table 2), land designated as Ancient Woodland is not considered appropriate for residential development.

Biodiversity: Sites of Nature Conservation Interest (SNCI) and Sites of Special Scientific Interest (SSSI)

- 3.25 The submission Local Plan Policy ENV2 covers the policy protection of both SSSIs and SNCIs to ensure a net gain in biodiversity. Currently, there are no SSSIs within Crawley's administrative boundary but there are four adjacent to, or very close to, Crawley, including House Copse SSSI (West of Bewbush) and Buchan Hill Ponds SSSI (next to Target Hill). In addition, Crawley has 17 SNCIs and six Local Nature Reserves.
- 3.26 Local Plan Policy ENV2 states that proposals which would result in significant harm to biodiversity will not be permitted unless the harm can be adequately mitigated, or, as a last resort, compensated for⁴⁴. Therefore, the potential for new residential developments within areas designated as SNCI's is limited and in general, other physical constraints such as flooding, heritage assets or Airport Safeguarding limit the potential of such sites.
- 3.27 Two sites which are constrained by nature conservation protection have been promoted historically through the SHLAA call for sites and, more recently, through the Additional Sites Consultation. These are:
- Land east of Street Hill; and
 - Land east of Brighton Road.

There is currently insufficient information to determine whether either of these sites could accommodate any development without significant harm to the biodiversity value and reason for its designation.

⁴³ National Planning Policy Framework, Para 118 (DCLG, 2012)

⁴⁴ Topic Paper 6: Green Infrastructure (Crawley Borough Council, August 2014) justifies the importance of sites of nature conservation value within and around Crawley's urban area. Core Documents Library Reference: LP015

Open Space, Sport and Recreation

- 3.28 The Crawley Open Space, Sport and Recreation Study⁴⁵ was published in May 2013 as part of the Site Allocations consultation for the Local Plan. The study was commissioned by Crawley Borough Council to identify local needs; to audit the local provision; to set and apply provision standards; and as an output, recommend draft policies for open space within the Local Plan. This study complies with the NPPF⁴⁶ and the former PPG17 and its Companion Guide in terms of methodology. It is considered it remains in conformity with the new guidance established by the national Planning Practice Guidance (PPG).
- 3.29 The study involved an audit of existing open space provision within the borough. The report mapped the existing provision of open space within the borough by typology and by neighbourhood. New quantity and access standards of provision were derived from public and stakeholder consultation. These standards help understand where the provision of different types of open space are in surplus or in deficit. The standards proposed are 'minimum' levels of provision.
- 3.30 In terms of establishing whether open space facilities are surplus to requirements, the study states a number of factors to be taken into account before any decision to release open space for alternative uses (including new housing) can be taken. These include:
- The local value and use of a given open space;
 - Whether the future population growth might generate additional demands for open space;
 - Whether there is demonstrable need for some other type of open space within the locality that is suited to that open space;
 - Other non-recreational reasons that suggest a space should be retained (such as landscape, biodiversity or flood prevention).
- 3.31 The Crawley Playing Pitch Study⁴⁷ was published in May 2013, alongside the Open Space, Sports and Recreation Study, as part of the Site Allocations consultation for the Local Plan. The report covers the supply of and demand for pitch sports within the borough.
- 3.32 Where sites were identified as having potential for further exploration in relation to opportunities for housing allocations, more detailed assessments have been undertaken to consider the factors in para. 3.30, above, and are set out in Appendix B. The sites identified for further assessment included:
- Tinsley Lane Playing Fields (Parks and Recreation – private sports club)
 - Breezehurst Drive Playing Fields (Parks and Recreation – public)
 - Bewbush West Play Areas (Children's Play Space – public)
 - Cherry Lane Playing Fields (Parks and Recreation – public)
 - Ewhurst Playing Fields (Parks and Recreation – public)
 - Land East of Brighton Road (Natural Green Space – private but largely publicly accessible)
- These sites were also subject to further consultation as part of the Additional Sites consultation (June 2013). Three of these sites are being progressed as

⁴⁵ Crawley Open Space, Sport and Recreation Study (JPC, May 2013) Core Documents Library Reference LP115

⁴⁶ National Planning Policy Framework, Para 73 (DCLG, 2012)

⁴⁷ A Playing Pitch Study for Crawley Borough Council (JPC, May 2013) Core Documents Library Reference: LP116

allocations for housing and open space development in the submission Local Plan: Tinsley Lane, Breezehurst Drive and Bewbush West (Henty Close Playground).

Infrastructure

Infrastructure Plan

- 3.33 The Infrastructure Plan⁴⁸ sets how the developments and policies of the Local Plan, including the provision of around 5,000 houses by 2030, will be delivered and supported by the necessary infrastructure. Through assembling information from the key infrastructure providers, such as water supply, education and transport, the key issues arising from Crawley's Local Plan in terms of infrastructure demands have been determined.
- 3.34 The main conclusions are that in most cases, there is already sufficient infrastructure that exists, or could be improved, within the borough to support the anticipated level of development within the Local Plan period. However, although not considered critical in terms of delivering the Plan, a small number of issues have been raised:
- Crawley's sewage treatment works is likely to meet future growth demands to 2021. Further discussions will need to take place with Thames Water to ensure that available capacity is provided beyond 2021;
 - Additional provision at both primary and secondary school level is required to cater for anticipated levels of growth and is being planned for by the education authority;
 - It is expected that Snell Hatch cemetery would remain open to all sections of the community until the end of 2017, when a new facility would need to be in place. Consultation on a proposed site at Little Trees to the south of Broadfield took place in Autumn 2014; and
 - GP provision in Bewbush has already reached capacity and will require additional facilities or expansion to meet growing need arising from new developments within the neighbourhood alongside new population from Kilnwood Vale. Discussions have taken place with the appropriate organisation as to how this could take place.

The council will continue to liaise with the infrastructure providers during the course of the Plan period to discuss the provision of infrastructure alongside the phasing of new development.

Water & Waste Water Infrastructure

- 3.35 In preparation for the Local Plan, Crawley Borough Council was the lead in commissioning an Outline Water Cycle Study⁴⁹ on a joint basis with Mid Sussex District Council, Horsham District Council and Reigate and Banstead Borough Council, with input from the Environment Agency. The study provided strategic level advice on water infrastructure and environmental capacity to inform the Local Plans for the four Local Authorities.
- 3.36 The assessment considered the potential impact of growth on the water environment using the (now revoked) South East Plan Regional Spatial Strategy housing targets for the sub-region, including 7,500 dwellings within Crawley from 2006 to 2026. In terms of results, although the south east, in general terms, is identified as being subject to significant water stress, the

⁴⁸ Infrastructure Plan for the Crawley Borough Local Plan 2015-2030 (Crawley Borough Council, November 2014) Core Documents Library Reference: LP005

⁴⁹ Gatwick Sub Region: Outline Water Cycle Study (Entec UK Limited, January 2011) Core Documents Library Reference: LP102

study, through a twin-track approach (demand management and bulk water supply transfer from other areas), suggests that there would be sufficient water supply to accommodate the 7,500 dwellings, identified by the South East Plan, in Crawley.

- 3.37 In addition, following discussion with Thames Water, the study identified that there would be sufficient capacity at Crawley Wastewater Treatment Works to accommodate 7,666 new homes at Crawley up to 2012, subject to the implementation of upgrade works that were scheduled to take place before 2015. Subsequently, on the basis that a total of 7,500 homes were expected, at that time, to come forward within Crawley between 2010 and 2026, the study concluded that wastewater treatment/sewage capacity would not represent a constraint to development.
- 3.38 Following on from the Gatwick Sub-Region Outline Water Cycle Study, an update and review of this document⁵⁰ was commissioned by Crawley Borough Council in view of the emerging Local Plan that anticipated, at that time, approximately 4,000 residential units over the Plan period rather than the 7,500 dwellings (South East Plan figure) used in the previous study. The following conclusions were drawn from the updated housing provision figure in relation to both water stress and wastewater capacity.
- 3.39 In terms of water stress, the reduction in Crawley's housing figure has coincided with lower forecasts of per capita consumption by water companies. However, the overriding change since the previous study is that although Southern Water has projected a lower volume of per capita consumption of water, it is forecasting a supply deficit. This is recognised as being largely driven by climate change and environmental constraints on abstraction. Owing to the emergence of a baseline deficit, the water resource constraint would now be considered moderate-high, which is a slightly worse position than in the previous study. However, Southern Water is continuing to work on its Water Resource Management Plan, which sets out its strategy to secure healthy and reliable water supplies in the South East for the next 25 years through enhanced water efficiency; leakage reduction; and improved water transportation across the region.
- 3.40 In terms of wastewater capacity, the Outline Water Cycle Study (January 2011) identified sufficient capacity at Crawley Wastewater Treatment Works to accommodate 7,666 new homes at Crawley up to 2021, subject to upgrade works during the period 2010-2015. These upgrade works have been completed and cater for growth to 2021. The ability of the existing Crawley WwTW site to accommodate further expansion needs to be confirmed due to the availability of land, with the requirement for an additional facility dependent on various factors including housing forecasts and changes in technology for the treatment of waste water and trade flows. The Water Cycle Study Update (2013) reflected an updated objective assessment of housing need, and confirms that housing growth being considered up to 2021 could be accommodated by the WwTW. Although the housing figure is less than the original 7,000 dwellings considered in the original outline study, this also takes into account planned strategic development adjoining Crawley. Further upgrades could be required beyond 2021 to meet the needs of development within the latter part of the Plan period. This would also need to take into account the potential for Gatwick Airport to increase the discharges

⁵⁰ Water Cycle Study Update and Review of Policy Implications (Crawley Borough Council and Amec Environment and Infrastructure Limited, October 2013) Core Documents Library Reference: LP101 <http://www.crawley.gov.uk/pw/web/PUB206690>

containing de-icer through the WWTW from their on-airport lagoons. Further discussions will therefore take place with Thames Water as further details emerge to help ensure that available capacity is provided beyond 2021.

Transport Infrastructure

- 3.41 In preparation for the Local Plan, Crawley Borough Council commissioned a Local Plan Transport Strategy, split into two stages. Stage One of the Local Plan Transport Strategy⁵¹, published alongside the Preferred Strategy Local Plan, examined the implications of three land use development options and compared them with the baseline situation. The three options all included an additional development of 145,500 gross employment floor area over a 15-year Plan period, but differentiated on additional new households per annum:
- option one included 300 new dwellings per annum;
 - option two included 400 new dwellings per annum; and
 - option three included 500 new dwellings per annum.

Stage One also excluded any impact mitigation of schemes, which were to be identified in Stage Two of the exercise.

- 3.42 The Stage One outcomes indicate that the strategic developments options for Crawley would have a similar, adverse, impact upon the wider-area highway network performance in the AM peak by 2029. However, it was contended that many of these congestion problems would also be present in the baseline scenario. It was concluded that on a more localised Crawley network, Option One would entail marginally fewer congestion and queuing delay problems, relative to the baseline, than either of options two and three. It was lastly recommended that for Stage Two of the transport modelling exercise, it would be prudent to restrict the strategic development allocations of Crawley to at, or below, Option One (i.e. 300 dwellings per annum).
- 3.43 Stage Two of Crawley Borough Council Local Plan Transport Strategy⁵² is published with the submission Local Plan and it assesses the preferred and alternative strategic development outcomes. The objective of Stage 2 has been to determine if the proposed allocation of land use developments around Crawley could be accommodated without causing severe stress in the road network. The Preferred Strategy comprised of all the Key Housing Sites and committed developments that collectively set the draft housing target for the Preferred Strategy Local Plan (the development of 3,543 net dwellings). The Alternative Strategy considers the development contained within the Preferred Strategy, but also the addition of potential site allocations/consultation sites. It was concluded that the impact of the additional Local Plan Preferred Strategy development (i.e. site specific proposals not already 'committed') will be limited in comparison with the 'reference case' (committed developments and transport schemes only).

Heritage and the Built Environment

Neighbourhood Principle for the 'New Town'

- 3.44 Crawley was designated as a New Town in 1947 and incorporated the settlements of Crawley, Ifield and Three Bridges. Policy CH1 of the submission Local Plan is the overarching policy for the neighbourhood

⁵¹ Crawley Borough Council Local Plan Transport Strategy: Stage One (Amey Consulting Limited, October 2012) Core Documents Library Reference: LP119
<http://www.crawley.gov.uk/pw/web/PUB182050>

⁵² Crawley Borough Council Local Plan Transport Strategy: Stage Two (Amey Consulting, August 2014) Core Documents Library Reference: LP120

principle and is supported by the Crawley Extensive Urban Survey (2008)⁵³ and the Crawley Baseline Character Assessment (2009)⁵⁴. This policy endeavours to protect and enhance the neighbourhood principle through focusing residential development within the neighbourhoods. In addition, mixed use and/or higher density development could be considered compatible with the existing structure of the neighbourhood. Subsequently, this policy assists in promoting sustainable development through taking an integrated approach to the location of housing, economic uses, and community services. Ad hoc residential development is restricted outside the main neighbourhoods to maintain the sustainable neighbourhood structure of the town.

Listed Buildings and Conservation Areas

- 3.45 There are 100 statutory Listed Buildings and 11 Conservation Areas within Crawley. In April 2010, Alan Baxter prepared the Crawley ASEQs and Locally Listed Buildings Heritage Assessment⁵⁵ for the council. This report recommended six new areas be designated as Conservation Areas. Five of these areas have now been designated by the council (with the exception of Gossops Green neighbourhood centre).
- 3.46 Policies CH13 and CH15 outline the council's policy in terms of protecting both Listed Buildings and Conservation Areas; these ensure that any proposed works are consistent with the character and appearance of the area/building, and result in the preservation or enhancement of the heritage asset. In addition, developments proposed in Conservation Areas should respect and enhance the character of lower density developments which have spacious landscaped settings.
- 3.46 In terms of housing land supply, the policies do not preclude new residential development within Conservation Areas, but the criteria of each policy does protect the demolition of existing buildings and would ensure that any residential development would need to respect the character, aesthetic quality and historical function of the area and this may limit residential densities, in particular in the Worth Conservation Area and Ifield Village Conservation Area which are more rural in character. Such considerations would be assessed on a case-by-case basis.

Areas of Special Environment Quality and Locally Listed Buildings

- 3.47 The Alan Baxter report examined whether the previous Area of Special Environment Quality (ASEQ) designation should be retained and defined the criteria according to which ASEQs should be designated. The report assessed eight existing ASEQs and 12 areas proposed as potential ASEQs. The report also defined the relationship between ASEQs and Conservation Areas and recommended that:
- areas which are primarily of historic and architectural interest should be protected as conservation areas; and
 - areas that are special because they are low density areas of landscape value should be protected as ASEQs, even where they contain buildings of some architectural quality.

⁵³ Crawley Extensive Urban Survey (Roland B Harris, 2008) Core Documents Library Reference: LP052

⁵⁴ Crawley Baseline Character Assessment (EDAW/AECOM, 2009) Core Documents Library Reference: LP053

⁵⁵ Crawley ASEQs and Locally Listed Buildings Heritage Assessment (Alan Baxter Associates, April 2010); <http://www.crawley.gov.uk/pw/web/int188179> and <http://www.crawley.gov.uk/pw/web/int188184> Core Documents Library Reference: LP054

- 3.48 All the existing and proposed ASEQs were assessed, and six ASEQs⁵⁶ (now renamed as Areas of Special Local Character) were recommended for retention. These recommendations have been taken forward as part of the submission Local Plan. Due to the urban location of these designations there are no sites within Areas of Special Local Character that have been allocated for future residential development. However, these designations do not themselves precluded development taking place. Policies CH12, CH14 and CH16 have been prepared accordingly to protect these locally specific assets and set out the appropriate criteria to be applied to planning applications.

Employment

Employment Space

- 3.49 The Economic Growth Assessment (EGA)⁵⁷ recognised Crawley's critical role in the sub-region for delivering economic growth, and forecasted a future need for business floorspace which equates to approximately 77ha, even at the baseline level. Through the Employment Land Trajectory⁵⁸, land to meet more than half of this need has been identified within the borough boundaries. The ability to meet the remaining need for business floorspace is constrained by the continued requirement to safeguard land for possible expansion of Gatwick Airport. As a consequence the EGA recommended the protection of existing main employment areas, and in particular highlighted the importance of retaining Manor Royal as a business hub and as a critical location for delivery of B Use Class development.
- 3.50 Employment sites explored further for opportunities for residential allocation included the three Stephenson Way sites and land adjacent to Three Bridges Station in the Three Bridges Corridor. These have been discounted, partially on the basis of their importance highlighted in the EGA⁵⁹, and as well as due to lack of landowner interest (for the Three Bridges Station site), viability and flooding constraints.
- 3.51 Recent amendments to the General Permitted Development Order have introduced greater flexibility to enable the change of use of buildings without the need for planning permission. From 30 May 2013, buildings in B1(a) office use have been able to change to C3 residential through a prior approval process, subject to demonstrating acceptability solely in terms of flood risk, transport and contamination. In Crawley, this has resulted in the issue of prior approvals for residential development in the town centre, at Manor Royal and other locations across the borough; several of which are being built out. The amended regulations have resulted in a number of unforeseen windfall approvals coming forward that will contribute to meeting objectively assessed housing need. However, it is recognised that this greater flexibility limits the council's ability to protect identified main employment areas for business and other economic use, increasing the challenges faced in planning positively for sustainable economic growth and further constraining land supply for economic growth.

⁵⁶ This includes Rusper Road, Goff's Park Road, Church Road, Barnwood Close/Mount Close, Blackwater Lane and Milton Mount Avenue.

⁵⁷ Economic Growth Assessment for the northern West Sussex Area (NLP, April 2014) Core Documents Library Reference: LP062

⁵⁸ Employment Land Trajectory (CBC, 2014) Core Documents Library Reference: LP064

⁵⁹ Crawley Borough Council Sustainability Appraisal/Strategic Environmental Assessment: Sustainability Report for the Submission Local Plan (CBC, November 2014) Core Document Library Reference LP003

Retail

- 3.52 The amended permitted development rights have also introduced greater flexibility relating to some main town centre uses. A1 (retail) and A2 (financial and professional services) may now convert space above premises to up to two residential flats without the need for planning permission. This has resulted in the prior approval of several upper floor units to residential in Crawley town centre.
- 3.53 New class IA allows for change of use and some physical works to enable A1/A2 units (of up to 150 square metres floorspace) to convert to residential use through the prior approval process. Given the relatively small scale of retail to which this applies, proposals have, in a Crawley-context, mainly related to individual units situated in residential areas outside of the town centre and neighbourhood parades. Because of the relatively low floorspace threshold to which the prior approval applies, it is not anticipated that town centre vitality and viability, particularly within the primary shopping area, will be negatively affected by the greater flexibility offered, nor is it anticipated that this will provide a significant number of new residential units.
- 3.54 The NPPF recognises that residential development can play an important role in ensuring the vitality of town centres and requires local plans to identify sites capable of accommodating a range of uses, including the need for housing. The Local Plan, therefore, identifies a range of sustainable town centre and edge-of-centre sites, both for wholly residential uses (Local Plan Policy H2) and for flexible mixed-use development which is appropriate to its Town Centre location (Local Plan Policy EC6).

4.0 Justification for the Supply-Led Housing Target

- 4.1 It has been recognised for several years that Crawley will not be able to meet its own demographic housing needs due to land supply constraints, and that housing development beyond Crawley's boundaries may be required to address this need, as established by the revoked South East Plan (2006-2026) and Crawley's adopted Core Strategy (2008)⁶⁰.
- 4.2 Over the past 20 years housing delivery within Crawley has been dependent on the development of strategic housing sites; including the development of Maidenbower neighbourhood and the former Crawley Leisure Centre (Pembroke Park) in Three Bridges. This is reflected in gross completions since 1991 (see Table 4, below). Between 1991 and 1998, the majority of Crawley's housing completions were in Maidenbower as the new neighbourhood was developed. Between 1998 and 2006, completions were more dispersed throughout the town. However, from 2006, a large windfall site at the former Leisure Centre, Three Bridges contributed significantly to supply through the delivery of 829 dwellings. This resulted in a higher five year average delivery rate between 2006 and 2011. Since then, Crawley's residential completions have decreased once more, largely due to the economic recession and increasing limitations on land supply. However, the development of the new Forge Wood neighbourhood is expected to significantly increase residential completions from 2015 onwards.

⁶⁰ See Panel Report on the Regional Spatial Strategy for South East England, August 2007, Matter 8G, para 24.1 – 24.70. See also, Crawley Borough Council Local Development Framework Core Strategy 2008, para 2.7.

Table 4: Total Gross Residential Completions in Crawley (1991/92 – 2012/13)

Year	Residential Completions	5 Year Average
1991-92	466	621
1992-93	508	
1993-94	680	
1994-95	652	
1995-96	803	
1996-97	672	375
1997-98	538	
1998-99	201	
1999-00	383	
2000-01	81	
2001-02	33	126
2002-03	73	
2003-04	116	
2004-05	188	
2005-06	221	
2006-07	545	480
2007-08	689	
2008-09	369	
2009-10	411	
2010-11	387	
2011-12	202	-
2012-13	85	-
2013-14	159	-
Total (23 Years)	8462	368

- 4.3 It is considered that the council has done everything it can to maximise the capacity of the borough to accommodate residential development over the Plan period and this is fully evidenced in this paper. This concludes that the borough has the capacity to accommodate a minimum of 5,010 net dwellings in the period 2015–2030, which is a minimum capacity figure based upon the council's Housing Trajectory at 30 September 2014. The significant amount of capacity work undertaken by the council since Issues and Options consultation in May 2009 demonstrates that the council has sought positively to meet the housing needs of the area and explore every opportunity for accommodating housing needs within the borough in accordance with the National Planning Policy Framework⁶¹ and Planning Practice Guidance on Housing and Economic Land Availability Assessment. The council's land supply figure is therefore considered to be robust, credible and sound.

5.0 Managing Housing Delivery over the Plan Period

- 5.1 The council's Housing Implementation Strategy⁶² (HIS) is a key evidence base document which supports the housing target identified in Policy H1 of the submission Local Plan. It provides detailed information regarding the management of housing land supply and delivery over the Plan period.

⁶¹ National Planning Policy Framework, para 14, 17 and 47 (DCLG, 2012)

⁶² Crawley Housing Implementation Strategy (CBC, November 2014) Core Documents Library Reference: LP007

- 5.2 Housing delivery over the Plan period is illustrated in the 'housing trajectory', which has a base date of 30 September 2014⁶³. The purpose of the housing trajectory is to indicate the expected rate at which new residential development is anticipated to come forward over the Plan period. The housing trajectory will be reviewed in April and September each year in conjunction with the Authority's Monitoring Report (AMR) process to track progress in housing delivery and assess how the market is performing.
- 5.3 The housing trajectory indicates that there is sufficient capacity to accommodate a minimum of 5,010 new dwellings within the borough as a supply-led housing target to 2030. Housing delivery in the first five year period of the Plan (up to 2019/20) will be above the annualised average delivery target including a 5% supply buffer (351 dwellings per annum) reflecting continued economic recovery and the anticipated completions from the Forge Wood neighbourhood. Housing delivery rates from 2020/21 – 2024/25 is expected to average approximately 330 dwellings per annum as Forge Wood and a significant number of the Key Housing Sites identified in Policy H2 are completed. However, currently identified delivery in years 11–15 is considerably lower, particularly from 2027/28 onwards.

Potential Risks to Housing Delivery

- 5.4 There are a number of potential risks for Crawley that could affect the future delivery of new homes in the borough and, subsequently, the delivery of the Plan as a whole. These are identified below and include:
- the economic climate;
 - the site's status within the planning system; and
 - infrastructure provision
- 5.5 The health of the economy and housing market in particular will be a major factor in determining the supply and delivery of housing throughout the Plan period. Although the housing market is showing signs of recovery at the national level, net housing completions in Crawley in the last three years have been low totalling only 437 units. The Housing Trajectory illustrates that housing delivery is expected to increase significantly from 2015 onwards as the Forge Wood neighbourhood commences. However, if the housing market experiences another unexpected downturn, this could have detrimental impact upon completion rates and the council would have limited powers to influence such issues. This is particularly the case in Crawley because, outside of Forge Wood, many sites are brownfield, town centre sites which are relatively costly to build and are only likely to come forward in a buoyant housing market.
- 5.6 The HIS also concluded that there is a potential risk that some of the sites identified within the housing trajectory would not come forward as anticipated particularly in the case of allocated sites without planning permission, which accounts for an identified 1,662 net dwellings within a total commitment of 5,010 (net) dwellings. However, Crawley's viability assessment has demonstrated that there would be no financial impediment to the identified housing sites coming forward at the times anticipated. The viability assessment took account of future Local Plan policies, including affordable housing policy, the creation of a residential CIL rate and revised Section 106 requirements, residential space standards, and environmental policy.

⁶³ Crawley Housing Trajectory (CBC, 30 September 2014) Core Documents Library Reference: LP080

- 5.7 As stated previously in Section 3, the Infrastructure Plan (November 2014) concluded that there is sufficient infrastructure, or there will be sufficient infrastructure, to support the Local Plan and the level of housing development identified in Policy H1. However, ongoing dialogue with the infrastructure providers will be required to ensure that this remains the case throughout the Plan period. Importantly, further upgrades could be required beyond 2021 at the wastewater treatment facility to meet needs of development within the latter part of the Plan period. Further discussion will need to take place with Thames Water to help ensure that available capacity is provided beyond 2021.

Five Year Housing Land Supply

- 5.8 Taking account of the housing trajectory and the potential risks to housing delivery in the borough as outlined above, it is possible to establish a five year housing land supply (as shown in Appendix C). However, the calculation of an 'annualised' flat rate residual Plan requirement across the period to 2030 is challenging, since the supply-led approach to housing delivery makes it difficult to identify specific sites for years 11–15 (2025/26 – 2029/30).
- 5.9 The Five Year Land Supply position is set out in Appendix C. This demonstrates that from the anticipated adoption of the Plan in 2015 until 2020, there is a sufficient five year supply of deliverable sites within Crawley in accordance with the requirements of the NPPF (including a 5% buffer).

6.0 Conclusions

- 6.1 The council is confident that it has sought to maximise the capacity of the borough to meet identified housing needs over the Plan period 2015–2030 and, in doing so, has positively sought to meet housing needs in accordance with the presumption in favour of sustainable development. This process has involved ongoing engagement with key stakeholders including public and private landowners, developers and statutory consultees on any site considered to have potential or be promoted for housing. This work has enabled the council to identify the capacity of the borough to accommodate future housing development, expressed as a minimum supply-led figure of 5,000 net dwellings over the Plan period as identified in Policy H1 of the submission Local Plan.
- 6.2 However, it is also clear that the council is unable to meet its objectively assessed housing need of 8,100⁶⁴ dwellings in the period 2015–2030. Joint working with those authorities across both the northern West Sussex and East Surrey Housing Market Area (principally Horsham, Mid Sussex and Reigate and Banstead) will therefore be required in order that Crawley's unmet housing needs (currently 3,120 dwellings over the Plan period) can be accommodated across the wider Housing Market Area. This is explored in more detail in Topic Paper 5: Unmet Needs and the procedures supporting

⁶⁴ Objectively Assessed Housing Need annual requirement figure of 540 dwellings per annum multiplied by the 15 year Plan period (540 X 15 = 8,100), in line with paragraph 2.17 of the submission Local Plan (CBC, 2014) Core Document Library reference: LP001. Details of the Objectively Assessed Housing Need are set out in full in Topic Paper 2: Housing Need (CBC, 2014) Core Document Library reference: LP011 – this potentially reduces the objectively assessed housing need annual requirement to 535 dwellings in line with paragraph 6.13 of the submission Local Plan.

this are explained in detail in the Crawley Local Plan Duty to Cooperate Statement⁶⁵.

⁶⁵ Duty to Cooperate Statement for the Crawley Borough Local Plan 2015 – 2030 (CBC, November 2014) Core Document Library Reference LP006

Appendix A: Stakeholder Position Statements for Key Housing Sites

Consultee:	Environment Agency
Key Housing Site:	Land adjacent Desmond Anderson, Tilgate
Current Position:	
<p><u>Flood risk</u></p> <p>We would have no objection to the principle of this site being considered for residential development allocation as part of the Preferred Strategy.</p> <p>However, as part of the site is within Flood Zone 3 and 2 the local authority should be satisfied there are no reasonably available sites at lower risk of flooding, in order for the Sequential Test to be passed.</p> <p>Subsequent to passing the Sequential Test, a detailed Flood Risk Assessment (FRA) must be submitted in support of a planning application in order for the Exception Test to be passed. The FRA must demonstrate the proposed development can be made safe against flooding without increasing flood risk elsewhere and preferably, should include measures which reduce flood risk. One point of concern is that Flood Zone 3 passes across the centre of the site which means any potential occupiers of property in the southern part of the site could have restricted access under flood conditions. The layout should also follow a sequential approach, by placing more vulnerable forms of development such as housing, in the area of least flood risk. This means we would be opposed to residential development within the area of the site currently shown to be within Flood Zone 3.</p> <p>Based on a desk study, we believe the opportunity exists and should be taken, to incorporate measures which reduce the extent of flooding and so provide greater flexibility with the design. Reasons for this are discussed below.</p> <p>The Tilgate Brook flows north as an open channel along the eastern boundary before entering a culvert near the junction of Winchester and Canterbury Road. This watercourse appears to be the main source of flood risk to the site. This risk is likely to have been exacerbated by a poorly designed culvert alignment, caused by a ninety degree bend at the culvert inlet structure. The culvert, which may also be of insufficient capacity, then flows north-east for a short distance before turning north beneath Canterbury Road. It is probable the watercourse bursts its bank immediately upstream of the culvert, causing floodwater to flow west across the middle of the site, towards the Thomas Bennett Community College.</p> <p>We recommend the opportunity is taken to reinstate the watercourse to open channel with a new alignment along the boundary with Canterbury Road. The new channel should then be reconnected to the culvert near to the north-east boundary of the site, in the vicinity of the junction between Canterbury Road and Ashdown Drive. This would reduce the flood risk to the central part of the site. Re-profiling of site levels along the northern boundary may be necessary to prevent floodwater flowing north onto property on Ashdown Drive. An open channel could be designed to have increased capacity compared to the existing culvert. It would also mean two existing sharp bends in the culvert would be removed, thereby improving flow conveyance.</p> <p>Paragraphs 5.23 and 5.24 of the Planning Policy Statement 25 (PPS25) Practice Guide recommend that Sustainable Drainage Systems (SuDS) are considered at the early stages of planning and that sufficient space is made available when considering density of development. The FRA should therefore include a drainage strategy which informs the layout and demonstrates runoff from the site is restricted to less than the current rate of discharge, using sustainable drainage systems. Reinstating a length of approximately 150metres of culvert to open watercourse would assist with options for sustainable drainage, along with enhanced landscaping, public amenity and biodiversity. It would also help meet the objectives of the Water Framework Directive as described elsewhere later on in.</p> <p>In summary, we have no objection to the principle of including this site amongst the preferred options, subject to inclusion of the necessary flood mitigation measures as described above, to make the site safe from flooding and reducing the risk elsewhere.</p> <p><u>Biodiversity</u></p> <p>The proposed Thomas Bennett housing site is located immediately to the north of Tilgate Park Local Wildlife site, which is also designated as Ancient Woodland and Deciduous</p>	

Woodland BAP habitat. Should a development be proposed for the site we would want to see that ecological surveys have been undertaken assessing the impact of the development on the ecology of the site and its surrounds, including protected sites, protected species, BAP priority habitat and BAP priority species. Mitigation should be proposed for any detrimental impacts identified. A method statement would be required to demonstrate how sensitive areas will be protected during the construction of the development.

Tilgate Brook is located along the east of the site. Any development proposal for the site should include a 5 metre wide buffer zone measured from the bank alongside the watercourse. The buffer zone will help to reduce shading, and should be free from all built development including lighting. To reduce light spill into the river corridor outside the buffer zone, all artificial lighting should be directional and focused with cowlings. Domestic gardens and formal landscaping should not be incorporated into the buffer zone. The buffer zone and river corridor could form a valuable part of green infrastructure.

Development of the site would be an excellent opportunity to open the culverted section of Tilgate Brook located beneath Canterbury Road. The aim of the de-culverted stretch of watercourse would be to enable natural river processes to be restored and a scheme should be designed to show how hydromorphological and habitat diversity would be achieved in channel. The buffer zone should also extend along this section of the watercourse.

The above recommendations are in line with the National Planning Policy Framework (NPPF). Paragraph 109 of the NPPF recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

My comments would be to draw the developer's attention to the Water Framework Directive. Detailed information can be found here: <http://wfdconsultation.environment-agency.gov.uk/wfdcms/en/thames/Intro.aspx>

The Water Framework Directive

The Water Framework Directive (WFD) (The Water Framework Directive (2000/60/EC) December 2000) seeks to improve the local water environment for people and wildlife, and promote the sustainable use of water. The Directive applies to all surface water bodies, including lakes, streams and rivers as well as groundwater. The overall aim of the WDF is for all water bodies to reach good status by 2027, this means improving their physical state and preventing deterioration in water quality and ecology. The WDF introduced the concept of integrated river basin management and such plans should influence local plans. The town of Crawley lies within the Thames River Basin District and South East River Basin District and in December 2009 the Environment Agency published the Thames River Basin Management Plan (RBMP) and the South East RBMP.

Date:	Email Dated: 17 August 2012
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Consultee:	Environment Agency
Key Housing Site:	Breezehurst Drive Playing Fields, Bewbush
Current Position:	
<p>We have just a few comments to make on the proposals to include the 2 sites within the Local Plan. Your general principles appear sound, using FZ3a and 3b designations to highlight the most at risk areas. You state you will continue to use the EA Flood Zones within your SFRA until the Upper Mole is remodelled, that does seem like a sensible approach. It may be worth noting that remodelling of the Upper Mole and tributaries has been programmed to start in 2015 and will take approximately 2 years. We have submitted a bid for funding and are awaiting a response.</p> <p>The site at Bewbush has already been partly developed, so it looks as if the rest of the site and the open land on the opposite bank to the old leisure centre is now being brought forward for development. This site is located at the very top of the Douster Brook so close</p>	

to the start of its Main River reach. The modelling to create the Flood Map in this location is a JFlow Improvement from 2009. So, it's better than 2004 JFlow, but still not as 'accurate' as detailed modelling, but is considered to be the best available information at the present time as a starting point.

We would expect an FRA to be carried out for any proposed development, a major area that would need to be covered in the FRA is surface water disposal. We would push very strongly for SuDs and a clear demonstration of a reduction in the run-off rate, as this is likely to be a Greenfield site we would certainly seek to keep run-off to the Greenfield rate, or even a reduction on this. This site is mostly FZ1, hence most comments will be concerned with surface water runoff, at this site it should be easy to keep all development out of the flood risk area (so sequentially placing the development on the site so it is all in FZ1). As the Douster Brook splits the site, the Main River comments and Byelaw Margin would apply, so we'd seek to keep development as far back from the watercourse as possible. Do the proposals to develop the site include the crossing of the Brook for access as this would mean we would be concerned about potential culverting and bridge soffit levels, but we would make detailed comments at the planning stage, which would then lead to Flood defence Consent (FDC) for any structure.

Date:	Email Dated: 6 September 2014
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Consultee:	Environment Agency
Key Housing Site:	Bewbush West Playing Fields, Bewbush
Current Position:	
<p>We have just a few comments to make on the proposals to include the 2 sites within the Local Plan. Your general principles appear sound, using FZ3a and 3b designations to highlight the most at risk areas. You state you will continue to use the EA Flood Zones within your SFRA until the Upper Mole is remodelled, that does seem like a sensible approach. It may be worth noting that remodelling of the Upper Mole and tributaries has been programmed to start in 2015 and will take approximately 2 years. We have submitted a bid for funding and are awaiting a response.</p> <p>Bewbush West, again the Flood Map is made up from 2009 JFlow Improvements, so not detailed modelling but still the best available information. More of this site is at risk, so we would expect this site to have parts that are classified 3a (maybe even 3b if it's classed as Greenfield), then FZ2 and FZ1. Any development should follow the sequential approach, placing highest risks into Zone 1, then appropriate uses through FZ2 and FZ3. A FRA would be even more critical at this site, not only for layout but ensuring no loss of flood storage and setting out surface water drainage proposals (again, use of SUDS) and a reduction/no increase in rate of run-off. The Spruce Hill Brook is a Main River, so again MR and Byelaw comments at planning to trigger a FDC.</p> <p>Hope this helps, a summary is the methodology you have used before still appears sound and a reasonable way forward. Both sites will need FRA's, out of the 2 Bewbush West has more flood risk constraints, which will need to be addressed, this may make the site less developable as there will be more obstacles to overcome.</p>	
Date:	Email Dated: 6 September 2014

Consultee:	West Sussex County Council Highways Authority
Key Housing Site:	Bewbush West Playing Fields, Bewbush
Current Position:	
<p>The principle of residential development would be acceptable. Whilst no indicative access arrangements are shown there are no apparent reasons why access to the site could not be taken from Arcturus Road or by way of an additional arm onto Sullivan Drive Roundabout, although this may be complicated due to the permitted bus gate access approved as part of DC/10/1612. The access arrangements would need to be the subject of a Stage One Road Safety Audit. Depending on the scale of the development, a transport assessment or statement would be required to consider the highway capacity consequences of this.</p>	
Date:	Email Dated: 13 May 2014

Consultee:	West Sussex County Council Highways Authority
Key Housing Site:	Breezehurst Drive Playing Fields, Bewbush
Current Position:	
<p>The principle of residential development would be acceptable. Whilst no indicative access arrangements are shown any development should be accessed via Sullivan Drive or Breezehurst Drive (if possible) rather than directly from the A2220. Given the likely close proximity of any access onto Sullivan Drive to the A264/A2220 Horsham Road Roundabout provision would need to be made for a right turning lane. The access arrangements would need to be the subject of a Stage One Road Safety Audit. Depending on the scale of the development, a transport assessment or statement would be required to consider the highway capacity consequences of this proposal.</p>	
Date:	Email Dated: 13 May 2014

Consultee:	West Sussex County Council Highways Authority
Key Housing Site:	Goffs Park Depot, Southgate
Current Position:	
<p>There are no apparent issues with this site. The site already benefits from an existing vehicular access onto Old Horsham Road. Depending on the scale of the development, a transport assessment or statement would be required to consider the highway capacity consequences of this proposal.</p>	
Date:	Email Dated: 13 May 2014

Consultee:	West Sussex County Council Highways Authority
Key Housing Site:	Tinsley Lane, Three Bridges
Current Position:	
<p>The Local Highway Authority has issued pre application advice relating to this site. Concerns have been raised relating to the suitability (in terms of width) of Birch Lea to accommodate the potential increase in vehicular activity. The WSCC Fire and Rescue Access Manager has raised the need for a secondary access point. The potential impact upon highway capacity would need to be checked against the mitigation proposed as part of the North East Sector development. Issues have also been raised relating to accessibility to services.</p>	
Date:	Email Dated: 13 May 2014

Crawley LP SHLAA WSCC LLFA Comments

This should be read in combination with Comments provided on the LP itself.

Assessment has only been made on Category C, D, E, F sites (i.e. those not allocated planning permission and are developable/deliverable).

In general most sites are at low risk from local sources or have small areas showing as being at surface water risk.

Where flood risk is likely to be a particular consideration, the SFRA sets out further guidance provided by the Environment Agency.

As most sites are brownfield development it is likely that drainage is already adequate/ considered here; in those sites highlighted that are greenfield/permeable surface water should be included in any further assessments.

It is unlikely that local flood risk would constrain development potential.

Red = large parts/all of site at risk
Orange = parts of site at risk
Yellow = minor areas of risk on site
Green = low risk on site

Site Name	FLOOD RISK LEVEL						Historic records? Y/N	Historic Comments
	Rivers and Sea		Surface water		Groundwater	Risk Level		
	FZ - 2	FZ - 3	1 in 30	1 in 100				
Deliverable (Local Plan Policy H2)								
Breezehurst Drive, Bewbush							N	
Land Adjacent to Desmond Anderson School							N	
Kilnmead Car Park, Northgate							N	
Ifield Community College							N	
Forge Wood (North East Sector)							Y	Northern part of site
Southern Counties							N	
Fairfield House							Y	Western edge of site
Former TSB Site, Russell Way, Three Bridges							N	
Zurich House							N	
15-29 Broadway							N	
Langley Green Primary School							N	
Tinsley Lane, Three Bridges							N	
Goffs Park Depot, Southgate							N	
5-7 Brighton Road							N	
WSCC Professional Centre, Furnace Green (Planning Permission Granted)							Y	Much of eastern part of site
Developable (Local Plan Policy H2)								
Breezehurst Drive Playing Fields, Bewbush							N	
Henty Close, Bewbush							Y	Narrow strip at eastern extent of site.
Longley Building							N	
Town Centre Key Opportunity Sites (Local Plan Policy H2)								
Land North of The Boulevard							N	
County Buildings							N	
Telford Place, Three Bridges							N	
Crawley Station and Car Parks							N	
Broad Housing Locations (Local Plan Policy H2)								
North East Sector Residual Land							N	
East of London Road							N	
Town Centre							N	

Appendix B: Site Specific Open Space Assessments

This appendix provides a chronological account of how the Local Plan has assessed the needs and opportunities for open space in Crawley and how the council has arrived at its conclusions regarding any loss of open space.

The council's previous Open Space Study was published in July 2008⁶⁶ following the adoption of the Council's Core Strategy in November 2007. The general recommendation in this study was to protect all open space with new residential development enhancing open space through S106 contributions. The study did not provide any recommendations on specific sites but instead provided the tools to be able to assess the value of open space on a site by site basis as and when a development proposal is submitted. This reflects the Core Strategy Policy EN3⁶⁷ which protects open space unless assessments clearly demonstrate the land is surplus to requirements.

The Open Space Study 2008 did not seek to identify land surplus to requirements and so the onus has been on developers (or the council as developer) to undertake additional assessment to clearly demonstrate land as surplus to requirements. This has happened most recently at Principle Park, Manor Royal (CR/2012/0134/OUT) and Ely Close, Tilgate (CR/2013/0019/FUL). The latter was refused on open space grounds but appealed successfully by the applicant.

In 2010, work commenced to develop the PPG17 Assessment beyond identifying general quantity surplus/deficits to provide a greater understanding of not just areas where there is an above average amount of open space but whether that space was of value. This signalled a more proactive approach by the council to protect and enhance those sites of value and choose a way forward for low value sites: first, to increase its value as open space if possible, by improving quality and/or a change to another type of open space that is needed. Failing this the site would be surplus to requirements as open space and therefore suitable for non-open space uses such as housing. It was felt that this approach would allow the council to positively plan to make the best use of land as part of the Core Strategy Review. This approach was in accordance with national planning policy pre-NPPF and the Companion Guide to PPG17⁶⁸.

Much of the background research was completed by the council between 2010 and 2012 and, at the same time, recommendations from the 2008 study were progressed. In early 2013, JPC Consultants came on board to complete the assessment of the current and future needs for open space across the borough.

⁶⁶ Open Space Sport and Recreation Study, PMP Ltd, (July 2008)

⁶⁷ Crawley Borough Local Development Framework Core Strategy, October 2008 Revision (p36).

⁶⁸ Assessing Needs and Opportunities, A Companion Guide to PPG17, Kit Campbell Associates/ODPM (2002)

JPC/Leisure and the Environment also undertook a Playing Pitch Study assessing the supply and demand for playing pitches across the borough⁶⁹. One of the key outcomes of these studies was to identify if there were opportunities to rationalise any types of open space to contribute to meeting housing need whilst ensuring residents have sufficient open space to 2030. This was completed in May 2013 and helped form the Site Allocations consultation. In light of the Key Priorities Sections of the study, the council decided to further assess the possibility of accommodating some development on the following open space sites:

- Breezehurst Drive Playing Fields
- Bewbush West Playing fields
- Tinsley Lane Sports Pitches
- Ewhurst Playing Fields (a new cemetery)
- Cherry Lane Playing Fields

Land East of Brighton Road was also included in the Sites Allocation consultation. This site was included in the SHLAA and highlighted as needing further assessment to consider its suitability for housing.

The consultation results are set out in the Additional Site Consultation - Housing Development Consultation Report⁷⁰.

It was recognised that further work was required as recommended in Section 9.7 of the open space study before any loss of open space could be confirmed for the submission stage of the Local Plan. This included site specific assessment of value, future development/population growth, the need for other types of open space and other considerations such as visual amenity value. This work was undertaken in light of and following the Sites Allocation consultation to determine whether the sites were suitable for development and any mitigation/compensation required. This is set out in the following sections.

⁶⁹ A Playing Pitch Study for Crawley Borough Council, JPC Strategic Planning and Leisure, Leisure and the Environment, (May 2013)

⁷⁰ Additional Site Allocations Consultation Summary Reports and Appendices (CBC, 2013) Core Documents Library Reference LP025

Breezehurst Drive and Bewbush West Playing Fields

This report builds on the findings of the Open Space, Sport and Recreation Study⁷¹ (2013). This study recognised the potential in Bewbush to rationalise provision of open space in return for improving the quality of retained provision. The report brings together information from the open space study and playing pitch study⁷² on Bewbush and further analyses the impact of the proposed housing allocations on open space provision in Bewbush up to 2030.

As the proposed allocations are on existing green space it is important that there is sufficient quantity remaining to meet the needs of residents. Equally important is the distribution of these spaces so that residents are within a reasonable walking distance. In addition to this is the quality of the open space, how much it is currently used and any wider benefits. These components taken together establish the overall value of the open space to help develop policies which make the best use of land. The types of open space and proposed housing allocations are shown at the end of the report.

Open space in 2011

The following figures show open space needs following an audit of open space. The amount of each type of open space is compared against an estimate of the open space provision that would meet residents' needs.

Year	Allotments	Amenity Green Space (>0.2ha)	Parks and Rec (public)	Natural Green Space	Play (Youth)	Play (Children)
2011	-0.60ha	3.59ha	2.07ha	5.55ha	-0.13ha	0.65ha

N.B. Figures show the amount in hectares over the defined standard for that type of open space.

The above table shows that there is a large amount of amenity green space, parks and recreation and natural green space. There is an undersupply of allotments and youth play space.

The Open Space, Sport and Recreation Study (page 68) states that current access to open space in Bewbush is good for all types of open space with the exception of allotments where there is a gap on the western side of the neighbourhood (Appendix BB4). Residents who live in this area need to walk approximately 15

⁷¹ Open Space, Sport and Recreation Study, Crawley Borough Council, JPC Planning and Leisure and the Environment (2013)

⁷² A Playing Pitch Study for Crawley Borough Council (May 2013) JPC Strategic Planning and Leisure and the Environment

minutes which is beyond the standard of 10minutes set out in the open space study (page 54).

The 2013 Open Space, Sport and Recreation Study (page 70) highlights the current mix of open space in Bewbush as an opportunity to rationalise the provision of some types of open space and in turn provide and improve other types of open space. The aim of this approach is to contribute to meeting development needs and enhance the retained provision of open space, making it more useable and popular for residents and sports clubs.

The Playing Pitch Study was also published in 2013. It focuses on sports pitch provision and concluded that Bewbush Neighbourhood “exceeds the provision standard for outdoor sports space and the quality audit has identified issues with the quality and capacity of pitches. There is potential to rationalise some provision in return for improving the quality of retained provision.⁷³” At the borough-wide level the study shows that there is a healthy supply of grass pitches shown from technical analysis and stakeholder consultation. There are, however, issues with the quality of facilities and drainage problems at many sites, which limit the amount of times they can be used per week.

Open space needs in 2030

This section reviews quantity, access and quality/use of open space in Bewbush if the first element of rationalising in the above approach is taken. The figures take into account development already planned in Bewbush, the proposed housing allocations at Breezehurst Drive and Bewbush West Playing Fields and also the estimated population in 2030 (8,929). The section then sets out what is required to ensure an overall improvement to open space in Bewbush.

Surplus/deficits of open space in Bewbush (2030)

Year	Allotments	Amenity Green Space (AGS)	Parks and Rec (public)	Natural Green Space (NGS)	Play (Youth)	Play (Children)
2030	- 0.61ha	3.56ha	-2.17ha	5.42ha	-0.04ha	1.26ha

The table above shows that there is still a large amount of amenity green space (AGS) and natural green space (NGS) but there would be a deficit of Parks and Recreation (P&R) space due to existing and proposed housing allocations on this type of open space. As these three types of open space can serve similar functions

⁷³ A Playing Pitch Study for Crawley Borough Council (May 2013) JPC Strategic Planning and Leisure and Leisure and the Environment, page 84.

(informal recreation, child and youth play, dog walking, and community events) it is worth noting that between these three typologies (AGS,NGS,P&R) there would still be 6.81ha of open space above the estimated need by 2030.

P&R open space does, however, function as formal sports pitches which AGS and NGS cannot. There would be loss of one sports pitch due to the proposed Breezehurst Drive proposal although there is space at the adjacent Skelmersdale Playing Fields to mark out additional pitches. The quantity of pitches could, therefore, remain the same but the greatest barrier to use of sports pitches is how playable they are due to inadequate drainage.

The Playing Pitch Study recommends a “mend before extend” approach to improve quality and capacity of sports pitches. This could be through enhancing drainage and utilising educational facilities and playing fields not currently marked out (as suggested above). An additional 3G pitch on an existing playing pitch would also address this problem as it could be intensively used e.g. for training all days of the week and mini soccer/youth matches played back to back at weekends. The study does identify a sufficient supply of 3G pitches (using the Sport England Facilities Calculator) but demand for is shown through consultation with leagues and clubs who like their versatility and availability as well as high levels of use.

The 2011 youth play space deficit is reduced as the Parkour area has been reclassified from child play space to youth play space. The amount of child play space has increased as the Millpond Adventure Playground is now included. This was previously omitted in error. The playground is for ages 8-18 so in practice this space could also be classed as youth play space thus eliminating the youth play space deficit.

Access to open space in Bewbush to 2030

The proposed allocations involve partial loss of parks and recreation open space therefore the impact on access is limited as the parks will still remain. The loss of the Henty Close Play Area would leave a small gap in access to play space in the south west corner of Bewbush (see Appendix BB3). Access to all other types of open space is unchanged.

Some open spaces that are adjacent to Bewbush should be taken into account as they are within the accessibility standard for many of Bewbush’s residents. For example, Buchan Country Park is within a short walk for many Bewbush residents. Whilst this is not counted in the quantity figures, for many residents it is much closer than to walk to the natural green space at Ifield Millpond which is within Bewbush.

In addition to this, a large part of the natural green space at Ifield Mill pond and Woldhurstlea woods are adjacent to Bewbush to the north but not included in the neighbourhood figures.

Bewbush is on the edge of Crawley and access to the countryside for walking, cycling and horse-riding is good. The development of Kilnwood Vale will impact on this but green corridors have been integrated into the Kilnwood Vale layout providing a recreational route from Bewbush out into the countryside through public rights of way including bridleways. The Kilnwood Vale Masterplan shows that a large park (approx. 7ha) will be provided on the eastern edge between the new neighbourhood and Bewbush. Whilst this space is provided to support the population of Kilnwood Vale, it will be accessible for Bewbush residents to use for informal recreation.

Quality of proposed allocation sites

Despite wider problems with pitch quality the football pitch to the south of the community pavilion is of excellent quality. The football pitch to the east is of poor quality and is currently not marked out. These pitches have been leased by Crawley FC for training purposes but they no longer have an interest in using the site. At this time there is no interest from other clubs/leagues for the pitches to be used. The club house and changing facilities at Breezehurst Drive Playing Fields are of high quality.

Henty Close Play Area, on the West of Bewbush Playing fields, is the site of the other proposed allocation. The council's Play Strategy recommends to upgrade some small play areas in Bewbush to better reflect the age profile of pre-teenage children within the borough. A quality/use assessment has not been undertaken of this play area, as it is expected to be necessary for replacement to compensate its loss.

Quality of nearby open space

The adjacent open space to the west at Skelmersdale walk has been used in the past as an American Football pitch but has not been marked out for some time. The surface condition is poor.

The two senior football pitches on the Bewbush West Playing Fields to the north of Henty Close Play Area are of average quality with changing rooms but would benefit from improved drainage. Dog fouling appears to be an issue. Various football teams use these pitches.

The sports pitches at The Green are of average quality and at the time of the survey were marked out as a cricket pitch and two junior football pitches. Under 11/12 play on the 9v9 pitches in the winter and Himani and Crawley Nayee Cricket use the

green as a cricket pitch in the summer. Changing facilities are shared with Bewbush West Playing fields. The site would benefit from pitch improvement works.

Level of use

A survey of pitch bookings against capacity undertaken by the council in 2010 showed that the Breezehurst Drive playing pitches were being used at 17% capacity which has further declined since Crawley FC's departure. Bewbush the Green was at 25% capacity and West of Bewbush 27% capacity. A survey of informal use of Breezehurst, Skelmersdale and Bewbush the Green playing fields showed low usage by the public with the exception of the play area at Bewbush the Green. Breezehurst Drive was the lowest rated playing field in the borough for level of use despite being rated as a good quality site.

Summary and Mitigation/Compensation Measures

Breezehurst Drive as a formal sport pitch

The allocated site is part of a larger park which has low usage levels for formal and informal recreation. As a formal playing pitch there is little to suggest that there is current demand for its use. Its value is also diminished by the large amount of playing field left which could be suitable for pitch sports. However, to leave headroom for future fluctuations in demand capacity should increase elsewhere. For example drainage could be improved and pitches marked out at Skelmersdale Playing Fields or a 3G pitch installed.

Breezehurst Drive as informal recreation space

Whilst the allocation creates an undersupply by 2030, there is a significant supply of natural green space within Bewbush and adjacent which serves similar functions. There is also a large amount of amenity green space for informal recreation. There is also no loss of a playing field as the housing number of 65 dwellings for this site would allow 50% of the allocation to remain as parks and recreation open space. It is recommended that the western side be retained as it is the closest pitch to the pavilion and has the best drainage.

Henty Close Play Area and Bewbush West Playing Field

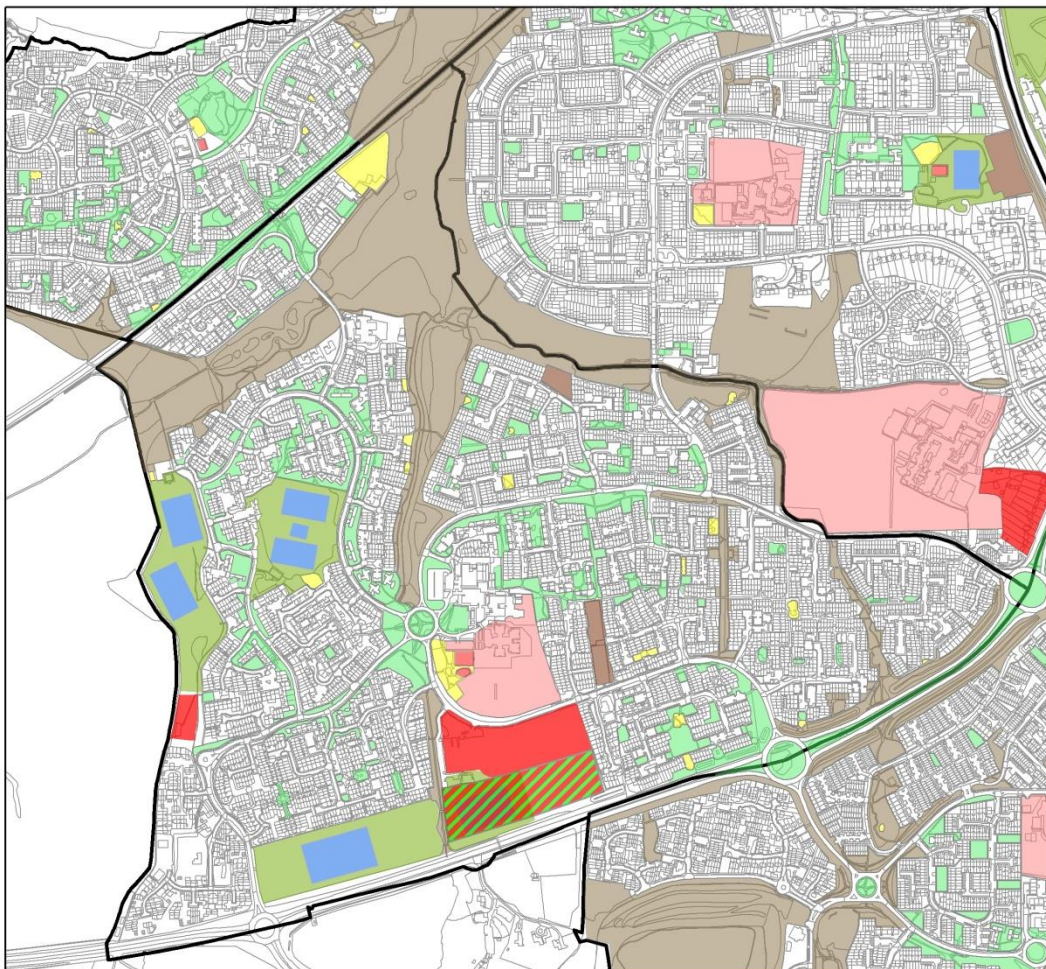
Whilst there is a sufficient quantity of children's play space, the loss of this play area creates a gap in access for the south west of Bewbush (See appendix BB3). With a lack of evidence to suggest otherwise it should be assumed that the play area is of value and should be re-provided ensuring that there is equivalent or better provision in a location that serves the area of deficiency.

A small area of the playing field around the play area also forms part of the proposed allocation. The area represents a very small section at the periphery of the park where the access road for the new neighbourhood of Kilnwood Vale will run adjacent to. The loss of this amount of open space will have little impact as it is part of a much larger area.

The proposed allocations should also address the lack of allotments on the western side of Bewbush if there is demand from residents. These could be located at Skelmersdale or Bewbush West Playing fields or on amenity green space of sufficient size.

Conclusion

The analysis above shows that the current mix and amount of open space in Bewbush provides an opportunity to reduce the provision of some types of open space to meet housing need and in turn require new and improved open space as part of development including allotments and improvements to playing fields/sports pitches. Overall this will ensure that open space in Bewbush is more useable and popular for residents and sports clubs.



Appendix BB1 – Estimated increase in population and loss of open space

Additional housing planned from 2011 to 2030:

- Dorsten Square, Bewbush Drive – **21** x 2 bedroom dwellings
- Breezehurst Drive – **112** dwellings. Loss of **2.08ha** of parks and recreation space.

Proposed housing allocations:

- Breezehurst Drive Playing Fields - **65** dwellings. Loss of **1.2ha** of Parks and Recreation Space.
- **24** units on West of Bewbush Playing fields (Henty Close and part of West of Bewbush playing fields). Loss of **0.32ha** parks and recreation and **0.023ha** Play (Children).

Total additional dwellings 2011 – 2030 = **222**

Total loss of open space:

Parks and Recreation = **3.6ha**

Play (children) = **0.023ha**

Estimated increase in population = **553**

Appendix BB2 – Impact of planned housing on Bewbush population to 2030

With the planned housing there would be an increase of 222 dwellings. It is important that increases in the Bewbush population are taken into account when assessing whether there is sufficient open space in the future. This can be done simply by multiplying the number of new dwellings by the likely occupancy of those dwellings (current average in Crawley is 2.49). This would result in an increase of 553 residents in Bewbush. 331 of these residents are from two sites already under construction.

To assess the impact this level of an additional 553 residents could be added to the existing population to arrive at a figure for 2030. However, demographic changes will affect the existing and new population over the next 15 years. The table below shows that the above calculation would not have been an accurate way of forecasting population change between 2001 and 2011:

Topic Paper 3: Housing Land Supply

Bewbush						
Year	No of dwellings	Est change	Actual Population	Actual Change	Ave household size	Ave household size change
2001 Census	3,173		9,081		2.86	N/A
2011 Census	3,234	+61	8,865	- 216	2.74	- 0.12
2030	3,515	+222	N/A		N/A	

Crawley pop 2001 = 99,744

Crawley pop 2011 = 106,597

The number of households increased but population has decreased between 2001 and 2011. Occupancy per dwelling has therefore decreased.

Using the additional housing between 2001 and 2011 to calculate population would create 151 residents to 2011 whereas the actual change was 216 fewer residents.

In 2001 Bewbush had the highest concentration of people aged 5 – 24 which has reduced dramatically over the past 10 years (2011 Census). The mean age has also risen which could explain the reason why the number of households has increased but population has decreased.

The average household size in Crawley is forecast to decrease from 2.48 in 2011 to 2.46 in 2021. There are no forecasts at the neighbourhood level. However, the number of people aged 20-44 in Bewbush has decreased compared to 2001 and the average age has increased from 29 to 32 which suggests that average household occupancy in Bewbush will fall further because of an ageing population.

New dwellings will increase the number of Bewbush residents but the decreases in household size through demographic changes is likely to dampen this increase.

If household size in Bewbush decreases to the forecast for Crawley average (2.46) then the population will be 8,647. This would represent another drop in population. As the average household size for Bewbush is already high it would perhaps be more realistic to estimate a decrease of 0.15 down to 2.59. Still some way above the Crawley average. The population in Bewbush would then be **8929** (see below). This is used in the calculations in the report.

8376 existing housing pop in 2030 (using 2.59 as an average household size)

553 from new housing (using 2.49 current Crawley average)

Total EST population in 2030 is **8929**

Open Space Totals in 2030

Parks and rec (Inc. pitches) = 12.12ha

Parks and rec (excl. pitches) = 8.373ha

Pitches = 3.74ha

Children's Play = 1.71ha

Youth Play = 0.14ha

Natural Green Space (NGS) = 23.28

Amenity Green Space (AGS >0.2ha) = 7.58

Allotments = 0.73

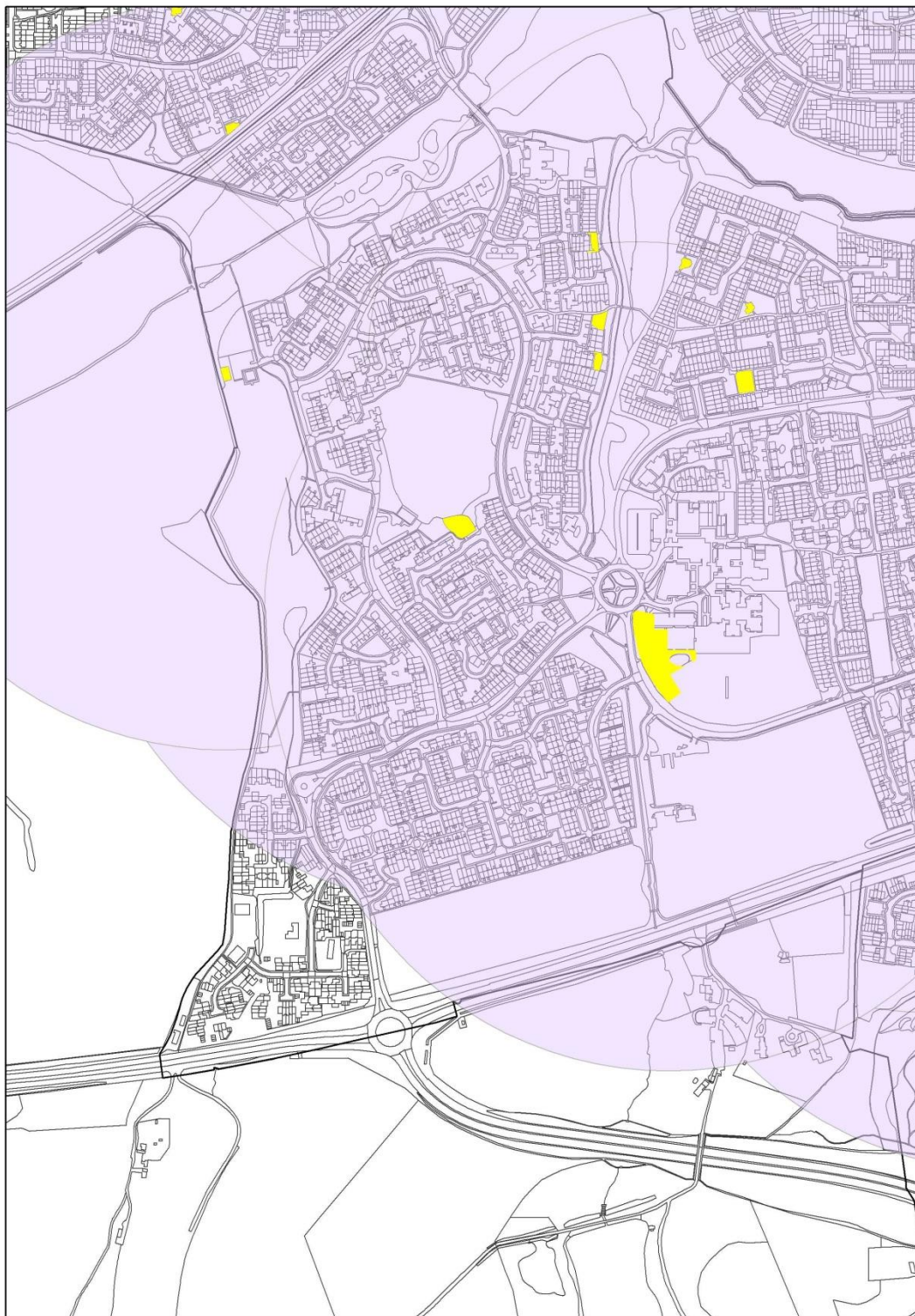
Education = 2.88

N.B.

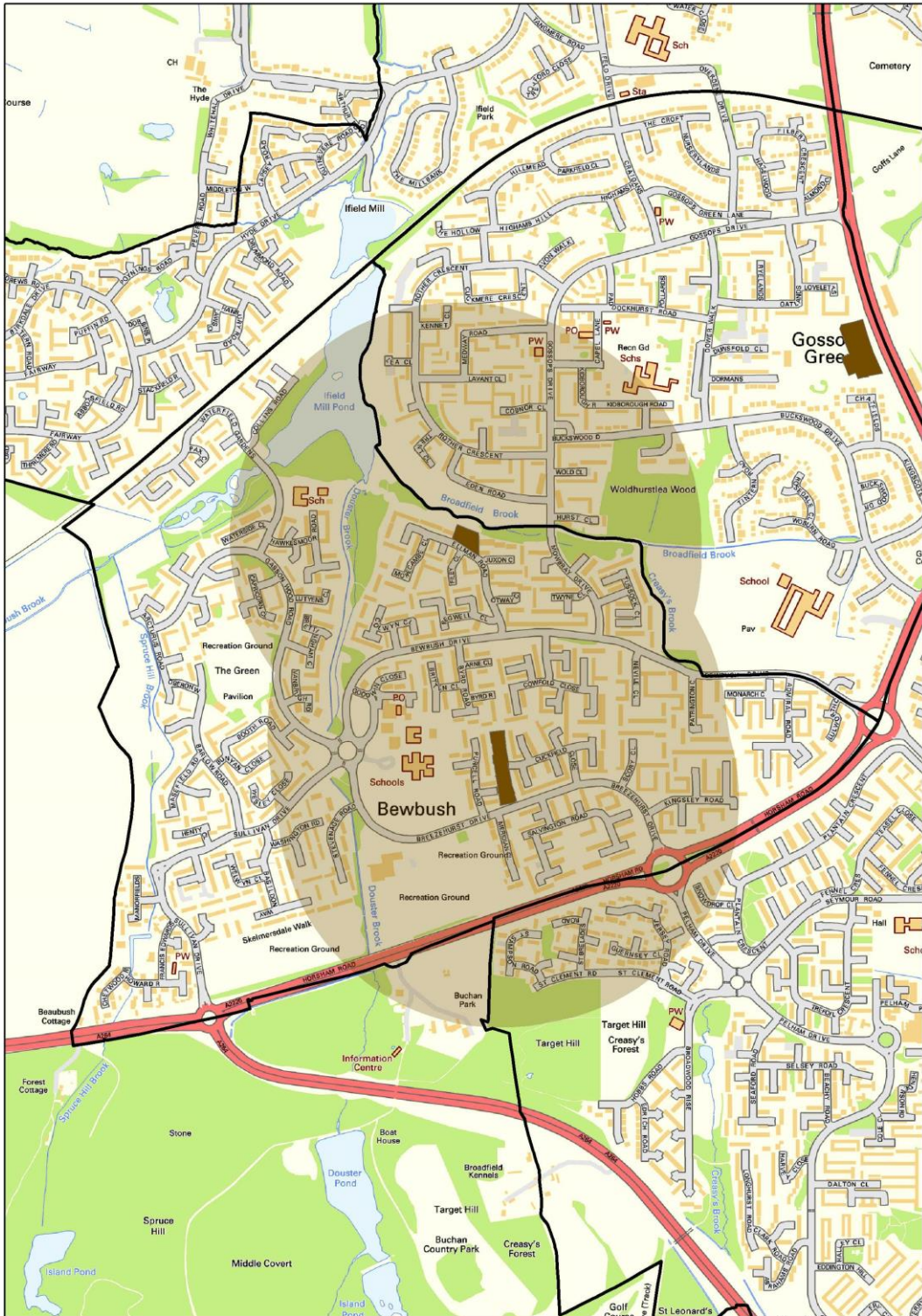
Children's Play Space includes Millpond Adventure Playground. This is for 6-18yr olds so could be classed as youth as well.

Parkour area also included and enlarged MUGA (previously estimated)

**Appendix BB3
Access to Children's Play Space**



Appendix BB4
Existing Access to Allotments



Tinsley Lane Sports Pitches

This report provides an assessment of the value of Tinsley Lane Sports Pitches in the context of existing alternative provision and also assesses whether the change from the existing open space use to housing would be detrimental to the open space needs of the surrounding community, neighbourhood or population of Crawley as a whole.

The report applies provision standards⁷⁴ to assess whether the proposed change of use would leave a sufficient amount of the right types of open space in this area and whether there are alternative sites within appropriate distances that meet the needs of residents. These findings will determine if and how a proposal could be taken forward in line with local and national policy and guidance:

- National Planning Policy Framework (2012) para 74;
- Crawley Borough Council Adopted Core Strategy (2008) policy EN3;
- Local Plan (2000) saved policy BN22;
- Submission Local Plan Policy ENV4.

The guidance and principles set out in the following documents:

- National Planning Policy Framework and Assessing Needs and Opportunities: A Companion Guide to PPG17;
- Playing Pitch Strategy Guidance, Sport England (Oct 2013);
- Assessing Needs and Opportunities Guide for Indoor and Outdoor Sports Facilities (Sport England draft Dec 2013).

The report draws upon local evidence available from the council:

- Crawley Open Space Sport and Recreation Study (JPC Strategic Planning and Leisure Ltd, 2013);
- Crawley Playing Pitch Study (JPC, Leisure and The Environment, 2013);
- Site Surveys of playing fields undertaken in 2010/11;
- Play Facilities – Investment proposals, (Nov 2013).

⁷⁴ Open Space, Sport and Recreation Study, Crawley Borough Council, JPC Planning and Leisure and the Environment (2013)

Site profile and typologies

The site is located in Three Bridges but close to Northgate to the west where Manor Royal Business Park lies and Pound Hill to the east separated by the London/Brighton railway line and Summersvere Wood (Ancient Woodland). Beyond the railway line is where Crawley’s new neighbourhood Forge Wood will be located. An aerial photo of the site can be found in Appendix T1.

The Open Space Study (2013) classes Tinsley Lane is as Limited Access Sports Pitches. The site is used for club football, within the freehold ownership of the Homes and Communities Agency and comprises three distinct areas:-

- A lower pitch, pavilion and car park (1.3ha) used by Oakwood Football Club which is within Division 1 of the Sussex County Football League
- The Middle field with 2 football pitches (1.7ha) are privately leased by Rentokill and Gillette for their own private use and are not open to the public as playing fields. It is understood that these pitches are also used by Oakwood Football Club.
- An upper field (1.5ha) which historically has had one pitch but has not been used for a number of years. It is now very overgrown and would be better described as natural green space although the football posts still remain from its past use.

Application of Open Space Standards

As housing is proposed on existing green space it is important that there is a sufficient quantity of the right types of open space remaining to meet the needs of residents. Equally important is the distribution of these spaces so that residents are within a reasonable walking distance. In addition to this is the quality of the open space in question and its level of use. Quality and use along with quantity and accessibility establishes the value of the open space. The types of open space in the area are shown in Appendix T1.

Current supply of open space in Three Bridges

Year	Allotments	Amenity Green Space	Parks and Recreation Grounds (public)	Parks and Recreation Grounds (public and private)	Outdoor Sports Space (Pitches)	Natural Green Space	Play Space (Youth)	Play Space (Children)
2011	0.66	-0.24	-3.14	4.36	0.6 -1.14	0.23	-0.09	-0.04

N.B. Figures show the amount in hectares over the defined standard for that type of open space.

The above table shows that within the boundary of Three Bridges there is not enough amenity green space, public playing fields, and play space for children and teenagers for the population of the area.

The three football pitches at Tinsley Lane are included in the OSP (pitches) figure as Oakswood Football club use the pitches in secured community use. The area is not included in the parks and recreation figures for the open space study as access for informal recreation is not available to the general public. The space at Tinsley Lane is classed as 'limited access' open space for this reason.

Quantity of open space in 2030

The following figures show open space provision taking into account planned development in Three Bridges, the partial loss of Tinsley Lane Playing Fields and resulting estimated population of Three Bridges in 2030 of 7,970.

Due to noise constraints that cover the north field and part of the middle field, the area that is developable is 2.55ha. This assessment uses this area as a basis for making calculations (it is not possible to confirm the exact housing mix and likely population of developing this area but an estimated 138 dwellings could be accommodated.) As with the Open Space study this is multiplied by Crawley's average household size of 2.49 (2011 Census) to give an estimated population of 344. However, it is worth noting that this may be an overestimate as the expected density of 54 dwellings per ha is high, suggesting smaller housing occupancy.

The loss of open space would comprise 2.55ha of outdoor sports space. The site is privately owned it is home to a football club that operates an extensive number of youth teams. It is assumed that if the land were not allocated for housing the football clubs would remain as no information suggests otherwise. The pitches are included in the Playing Pitch Study as secured community use and it is this assessment that will inform the impact on playing pitch provision.

The loss of the pitches does not impact public parks and recreation or outdoor sports space (pitches) as they are not accessible to the public.

Year	Allotments	Amenity Green Space	Parks and Recreation Grounds (public)	Parks and Recreation Grounds (public and private)	Outdoor Sports Space (Pitches)	Natural Green Space	Play Space (Youth)	Play Space (Children)
2030	0.50	-0.72	-4.85	0.1	-1.58	-1.89	-0.11	-0.10

The above table shows that the increase in population has reduced surpluses and exacerbated existing shortfalls particularly on public/private parks and recreation and outdoor sports space as the loss of green space has a greater affect than the increase in population.

Overall there is a shortfall of most types of open space within Three Bridges with the exception of allotments.

The following section takes into account whether residents in the locality are within reasonable distance from open space whether it is within Three Bridges or not.

Existing access to open space

The open space study shows that current access to open space in Three Bridges is good for most types of open space⁷⁵. Accessibility adds an important dimension to quantity analysis as it crosses neighbourhood boundaries. It would be arbitrary to judge whether sites are surplus purely on quantity without taking into account the proximity of nearby open space whether it be in the same neighbourhood or not.

For example, whilst there is a quantity deficit of parks and recreation grounds and public pitches in Three Bridges, the accessibility mapping shows that there are playing fields and pitches within a reasonable walking distance of Three Bridges residents located just outside the neighbourhood boundary.

The following analysis takes this additional element into consideration alongside the quantity assessment. The accessibility maps on pages 56-63 of the open space study are used alongside the quantity assessment to judge whether the proposal should supply open space.

Another important factor is that where there is a deficit or poor access to open space in an area, is the population large enough to sustain new provision of that type of open space? Open space types such as allotments, amenity green space and children’s/youth play space have relatively small catchment areas. Due to the severance of the Tinsley Lane area from housing to the south by Crawley Avenue it is

⁷⁵ Open Space, Sport and Recreation Study, Crawley Borough Council, JPC Planning and Leisure and the Environment (2013), page 68

quite a small catchment of approx. 260 houses. With the addition of the proposal this could result in approx. 398 properties or about 1000 residents.

The following assessment uses the quantity and access standards⁷⁶ set out in the Open Space Study to derive the needs and opportunities that the proposal creates:

Allotments

Whilst there is a sufficient amount of allotments per 1000 people in Three Bridges, there is a gap in access in the area around Tinsley Lane where it is beyond the reasonable distance one should expect to walk to an allotment.

Catchment requirement = 0.15ha

Allotments in Crawley tend to be bigger than 0.15 ranging from 0.25ha to 1.56ha with the exception of one in Northgate of 0.1ha.

Recommendation:

Provision on site or nearby would be required to meet the access standard. There should be discussion with amenity services as to the feasibility of providing a small allotment in this area to meet the access requirement. This should comprise a quantity proportionate to 0.15ha per 1000 people.

Amenity

There is an existing amenity open space shortfall in Three Bridges and there is an accessibility gap in the immediate area of Tinsley Lane playing fields.

Catchment requirement = 0.45ha

Useable AGS is anything over 0.2ha so this would serve as a good sized area to meet the needs of the local population.

Recommendation:

Amenity open space should be provided on site or nearby to meet the standards.

Natural Green Space (NGS)

The increase in population pushes the quantity of natural green space into a slight deficit. Proximity to natural green space is good although, in practice, Summersvere Wood, adjacent to the proposed site, is privately owned and not currently managed.

Catchment requirement = 1ha

⁷⁶ Open Space, Sport and Recreation Study, Crawley Borough Council, JPC Planning and Leisure and the Environment (2013), page 54

There is only a slight deficit of this type of open space and so it seems more appropriate to improve access/enhance biodiversity value of Summersvere Wood rather than provide new natural green space.

Recommendation:

Whilst there would be a deficit in the quantity of NGS in Three Bridges as a whole, there is a good amount in the vicinity of Tinsley Lane. This along with the current evidence base that focus should be on improving sites before expanding them it would seem more appropriate to enhance the nearby Summersvere Wood, if feasible.

Parks and Recreation

The amount of publicly accessible parks and recreation space in Three Bridges does not meet existing or future quantity standards. Grattons Park is close to Tinsley Lane but is inaccessible due to the Crawley Avenue cutting off access. Northgate playing fields is the most accessible park being approximately 20minute walk from Tinsley Lane.

Catchment requirement = 1.6ha (public & private)

This type of open space is more strategic than others especially in terms of formal pitch sports. The impact of the proposal would leave a marginal surplus of private and public parks and recreation space. However, it would leave a deficit of public parks and recreation provision which is the type of provision that residents would expect to be with 12/13min walk. There is currently no public park and recreation space in the Tinsley Lane catchment.

Recommendation:

It would be reasonable for the proposal to include a useable amount of green space (>0.2ha) for informal recreation. This could be alongside other types of open space provision on-site or adjacent. An alternative that could be explored would be to allow public use of the private playing fields. Creating improved access to Grattons Park across Crawley Avenue or to recreational space on the other side of the railway line as part of the Forge Wood development are also options.

Children's Play Space

There is a current and future shortfall in provision of children's play space. Access to play facilities in this location is poor as highlighted in the Play Facilities – Investment Proposals Report to Cabinet⁷⁷.

⁷⁷ Play Facilities – Investment Proposals Report to Cabinet, Crawley Borough Council, (Dec 2013)

Catchment requirement = 0.05ha

There are a number of children's play areas of this size and so it seems likely that the local population would sustain a children's play area.

Recommendation:

The proposal should provide provision for children either on-site or nearby as recommended in the Play Facilities Report.

Youth Play Space

There is a current and future shortfall in provision of youth play space as well as the proposal site being beyond a reasonable distance from the MUGA at Grattons Park to meet the needs of residents at Tinsley Lane.

Catchment requirement = 0.02ha

The catchment population creates demand for 0.2ha of youth play space but Crawley's smallest multi-use games area (MUGA) is 0.03ha. It may not be feasible to provide one given the estimated population of 1000 within the 600m catchment for youth play space. Use of a MUGA may be limited given the population that would use the facility.

Recommendation:

There is a lack of youth play space in Northgate/Three Bridges where well placed provision would be of benefit. However, it would be beyond the catchment of Tinsley Lane and so it should not be expected that the proposal provide new youth play space.

Outdoor sports (public pitches)

Whilst parks and recreation open space includes outdoor sports space, the playing pitch strategy specifically looks into the needs and opportunities for pitch based sports in Crawley.

The Three Bridges neighbourhood provision of grass pitches is 1.58ha short by 2030. This equates to about 2 football pitches and a cricket pitch as an example.

However, in the playing pitch study the private pitches at Tinsley Lane are included in provision as they are in secured community use – i.e. leased to a sports club. Oakwood football club has a number of youth teams which are open to members of the public. The three pitches are 1.64ha which when included within the supply figures meets the standard with a surplus of 0.7ha. Whilst the upper field has

historically been used for pitch sports it has not been in use for a number of years and so is not included in the pitch figures.

The current supply of pitches in Three Bridges including Tinsley Lane is 0.50ha above the standard. By 2030, taking into account the loss of the three Tinsley Lane pitches and increase in population, the 0.50ha surplus turns to a -1.58ha deficit. If the housing was built and the Tinsley Lane pitches were partially retained/relocated on another type of open space nearby the neighbourhood would have a slight surplus of pitches of 0.06ha by 2030. Looking at sports pitch needs purely by quantity standard, the proposal would only be acceptable if the pitches were relocated nearby.

Whilst it is useful to look at pitches at the neighbourhood level, they are more strategic in nature than say children's play areas as members of sports clubs are willing to travel further to use them⁷⁸. For this reason it is important to consider the loss of pitches against the borough-wide provision of pitches as well as on a neighbourhood basis.

At the borough-wide level the Playing Pitch Study found that there is a healthy supply of grass pitches from technical analysis and stakeholder consultation. However, there is an issue with existing capacity due to quality/drainage problems. The study recommends a "mend before extend" approach to improve quality and capacity of sports facilities. This could be through enhancing drainage and utilising educational facilities and playing fields not currently marked out. An additional 3G pitch on an existing playing pitch would also address this problem as it could be intensively used e.g. for training all days of the week and mini soccer/youth matches played back to back at weekends.

Development of pitches cannot be ruled out if they are of low value and delivered alongside improvements to higher value pitches to enhance capacity. Low value pitches are characterised by poor access, low usage, lack of safety/security and proximity to alternative higher quality provision. In this context, Tinsley Lane playing pitches are clearly not low value as they are well used by an established sports club. For the loss of these pitches to be acceptable in planning terms, the sports club would need to be relocated elsewhere and be equivalent or better in terms of quantity and quality.

Recommendations:

- Relocate pitches/club to the upper/middle fields (essentially a land swap).
- Relocating elsewhere would also be acceptable as club sports are a strategic provision of open space where players or members are happy to travel greater distances.

⁷⁸ Playing Pitch Study for Crawley Borough Council 2013 p5 para 1.3

- There is currently 15.2ha of playing fields at Hazelwick School. Establishment of a secure community use agreement for football clubs to use pitches/facilities could be explored as part of a solution.

Summary

For the proposal to be acceptable, a combination of onsite and offsite provision of open space is needed as set out above. One option could be to relocate the existing sports pitches/pavilion to the northern area and to use the remaining area as a mix of housing and open space to meet the above needs where practicable. A play area and green space for informal recreation linked to a managed and publicly accessible Summersvere Wood.



Ewhurst Playing Fields (a new cemetery)

In 2011, an extensive borough-wide site suitability assessment was undertaken. This looked at size, accessibility, security, safety, flooding, trees, typography and noise. Based on these criteria Ewhurst Playing Fields in Ifield was chosen as the preferred location subject to further assessment including impact on open space. The site was included in the Sites Allocation consultation undertaken in June 2013, a summary of which is in Appendix E2 of this report.

This report provides an assessment of the quality and value of Ewhurst Playing Fields in the context of existing alternative provision across the area. It assesses whether the change from the existing open space use to a cemetery would be detrimental to the open space needs of the surrounding community, neighbourhood and population of Crawley.

As such, the report applies provision standards⁷⁹ to assess whether the proposed change of use would leave a sufficient amount of the right types of open space in this area and whether there are alternative sites within appropriate distances that meet the needs of residents. These findings will determine if and how a proposal could be taken forward in line with local and national policy and guidance:

- National Planning Policy Framework (2012) para 74;
- Crawley Borough Council Adopted Core Strategy (2008) policy EN3;
- Local Plan (2000) saved policy BN22;
- Submission Local Plan Policy ENV4.

The guidance and principles set out in the following documents:

- National Planning Policy Framework and Assessing Needs and Opportunities: A Companion Guide to PPG17;
- Playing pitch Strategy Guidance, Sport England (Oct 2013);
- Assessing Needs and Opportunities Guide for Indoor and Outdoor Sports Facilities (draft Dec 2013).

The report draws upon local evidence available from the council:

- Open Space Sport and Recreation Study (2013);
- Playing Pitch Study (2013);

⁷⁹ Open Space, Sport and Recreation Study, Crawley Borough Council, JPC Planning and Leisure and the Environment (2013)

- Site Surveys of playing fields undertaken in 2010/11;
- Play Facilities – Investment proposals, (Nov 2013).

Site profile and typologies

The open space at Ewhurst Playing Fields is classed as a Parks and Recreation Ground with a sub typology of Sports Pitches and Play Area. The site is primarily used for club football and informal recreation and play. An aerial photo can be found in Appendix E3.

Key facts:

- The site comprises a play area (0.1ha), 2 senior football pitches, 1 junior pitch, 1 mini pitch and a pavilion (1.5ha) and Ewhurst playing field (2.45ha. excl. pitches/play area).
- The total open space is just over 4ha including treed areas and the pavilion.
- The site is located in Ifield Ward but is also adjacent to West Green and Langley Green.
- East and west fields separated by a line of mature trees and the play area.
- Ewhurst Place Pavilion – changing facilities.
- Car park – approx. 35 spaces.

The site has an overlapping function with amenity green space and natural areas which can be used for informal recreation and play. It is, therefore, important that the site is considered in the context of other types of open space.

Another key consideration is that a cemetery is also a type of open space. It is closest to the amenity green space typology (non-useable) with benefits such as enhancing the environment and as an important place for quiet contemplation especially in a busy urban area.⁸⁰

Application of Open Space Standards

As the siting of a cemetery is proposed on existing green space it is important that there is a sufficient quantity of the right types of open space remaining to meet the needs of residents. Equally important is the distribution of these spaces so that residents are within a reasonable walking distance. In addition to this, is the quality of the open space and its level of use. This, along with quantity/accessibility,

⁸⁰ PPG17 Companion Guide p80

establishes the value of the open space. The types of open space in the area are shown in Appendix E1.

Current supply of open space in Ifield

Year	Allotments	Amenity Green Space	Parks and Recreation Grounds (public)	Parks and Recreation Grounds (public and private)	Outdoor Sports Space (Pitches)	Natural Green Space	Play Space (Youth)	Play Space (Children)
2011	0.35	2.04	-2.49	0.40	0.62	15.95	-0.15	0.07

N.B. Figures show the amount in hectares over the defined standard for that type of open space.

The above table shows that there is a large amount of natural green space with amounts of amenity green space, sports pitches, play space and allotments also above the standard. Public parks and recreation grounds are below the standard. Including the private playing field/sports pitches at Ifield Green (North), there is an above standard amount although these are not currently in use.

Quantity of open space in 2030

The following figures show open space provision taking into account planned development in Ifield, the loss of Ewhurst Playing Fields and also the estimated population in 2030 (9,350).

Year	Allotments	Amenity Green Space	Parks and Recreation Grounds (public)	Parks and Recreation Grounds (public and private)	Outdoor Sports Space (Pitches)	Natural Green Space	Play Space (Youth)	Play Space (Children)
2030	0.28	1.83	-7.19	-4.30	-1.08	15.01	-0.16	-0.06

N.B. Figures show the amount in hectares over the defined standard for that type of open space.

The amount of children’s play space in Ifield would be under the standard by 2030 if the Ewhurst play space was removed and no additional provision came forward.

The table above shows that there is still a large amount of natural green space but a greater deficit of Parks and Recreation space. As these types of open space serve similar functions it is worth noting that between these two typologies there would be almost 7.82ha of space above the required provision in 2030 when combined. Parks and recreation grounds can be used for informal play (child and youth) and dog

walking. These uses can equally take place on natural green space or amenity green space if located within a reasonable distance from where residents live.

The Park and Recreation space at Ewhurst does, however, function as formal sports pitches which natural green space cannot and that is in deficit by 2030. There are currently two pitches to north of Ifield Green in private ownership which are not currently in use and so are not included in the figures. Also, the pitches at Ifield Community College (ICC), where Crawley Town Girls and Horley Hockey Club play, are not included in the above figures. If the privately owned pitches were brought back into use, and ICC pitches included, there would be a surplus of sports pitches in Ifield by 2030.

Notwithstanding neighbourhood provision, sports pitches are also a strategic provision of open space as members of sports clubs are willing to travel further to use the them⁸¹. For this reason it is important to consider the loss of pitches against the borough-wide provision of pitches as well as on a neighbourhood basis.

At the borough-wide level the Playing Pitch Study found that there is a healthy supply of grass pitches from technical analysis and stakeholder consultation. The issue is not identified as a lack of pitches but their existing capacity due to quality/drainage problems. The study recommends a “mend before extend” approach to improve quality and capacity of sports facilities. This could be through enhancing drainage and utilising educational facilities and playing fields not currently marked out. An additional 3G pitch on an existing playing pitch would also address this problem as it could be intensively used e.g. for training all days of the week and mini soccer/youth matches played back to back at weekends.

Existing access to open space

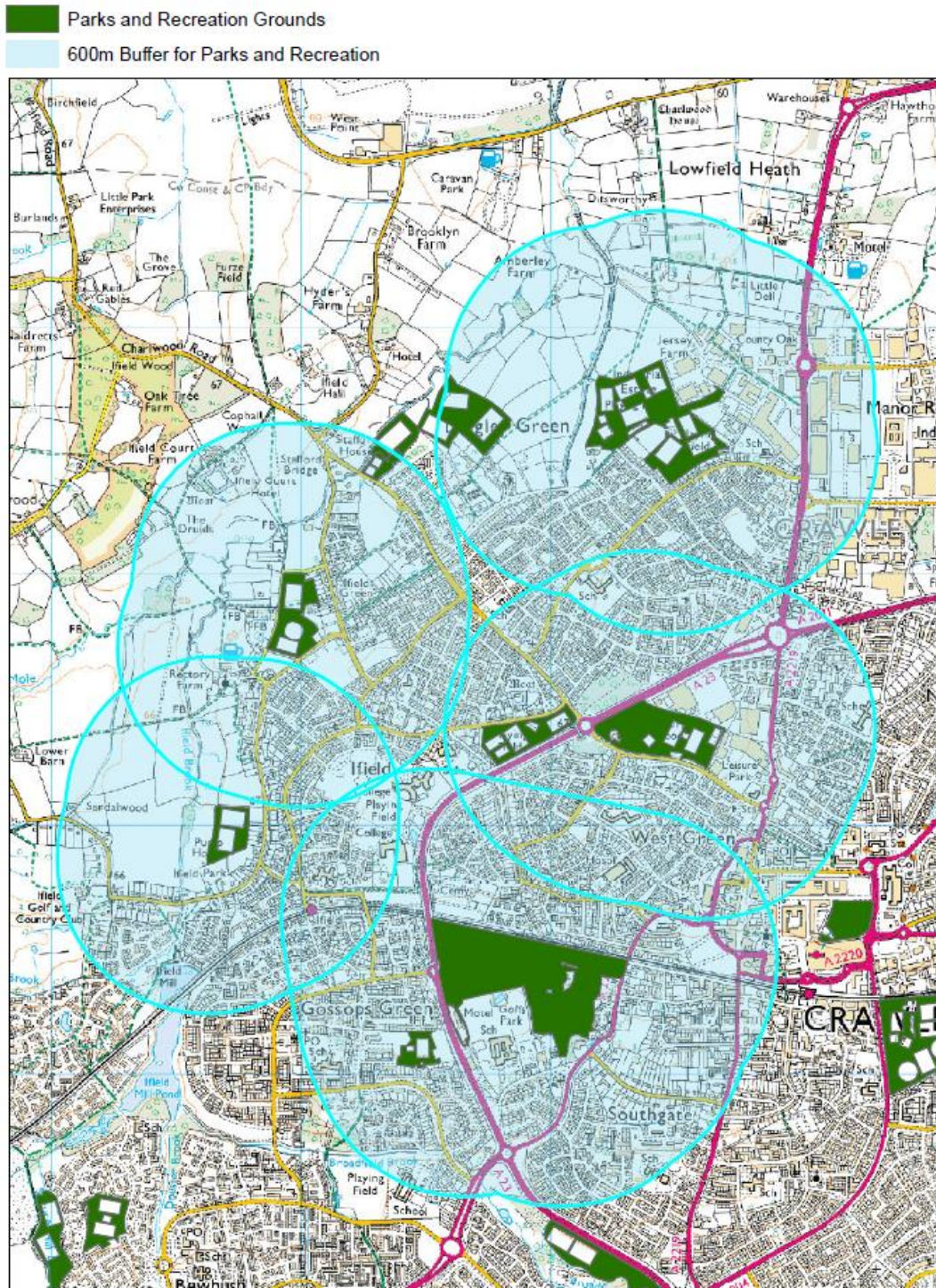
The Open Space, Sport and Recreation Study shows that current access to open space in Ifield is good for most types of open space with the exception of allotments, where there is a gap in the south and eastern areas, and children’s play space, where there is a gap in the centre of the neighbourhood.

Access to open space in 2030

The map below shows that the loss of Ewhurst Playing Fields would result in a very small gap in access along Fitchet Close. However, the walking time from here to Cherry Lane Playing fields is 12 minutes, which meets the 12/13min walking standard for Parks and Recreation space.

⁸¹ Playing Pitch Study for Crawley Borough Council 2013 p5 para 1.3

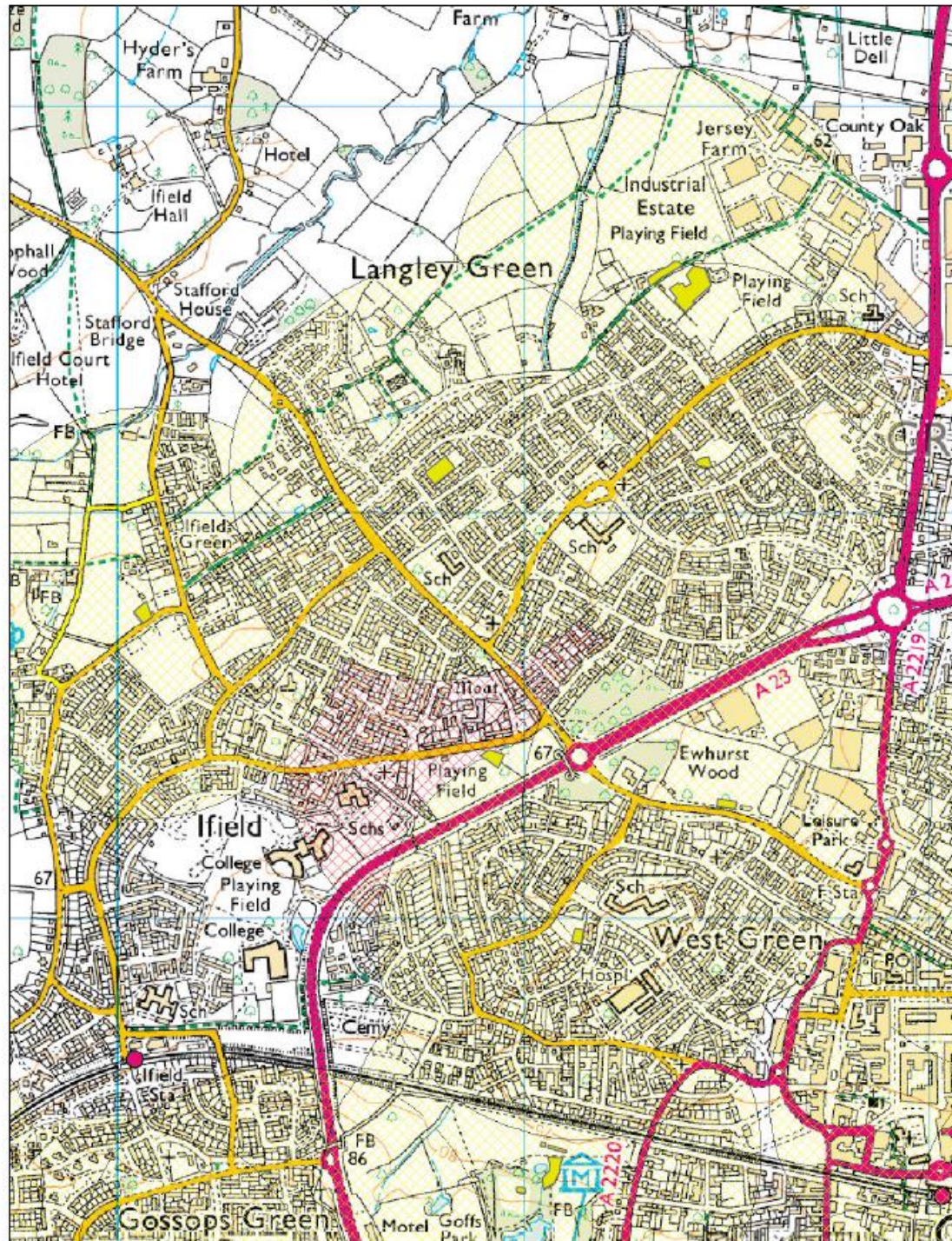
Access to Parks and Recreation without Ewhurst Playing Fields



The map below shows that the loss of Ewhurst Children’s Play area would result in reduced accessibility for a small area of housing adjacent to Ewhurst Playing Fields. For these residents, walking times to play areas would increase from 1-3 minutes to 10mins walk.

Current Access to Childrens Play Space

- Play Space (Children)
- Areas with good access
- Provision of access from Ewhurst play space



Existing quality and use

Ewhurst outdoor sports pitches comprise of a senior football pitch, a junior and mini pitch, changing facilities and a car park. Pitches are of average quality. However, the football pitches are popular as they are level and well drained. The junior sections of Crawley Wasps Girls play their home games and train at Ewhurst. This is part of a large and established club that is integral to the participation and success of girls' football in Crawley and surrounding area. All Crawley Wasps games are played on a Sunday and training is on Wednesday evenings (Oct-March at Ifield Community College all weather pitch). The pitch is also used a back-up pitch for other teams that play in Crawley.

A survey of pitch bookings against capacity undertaken in 2010 showed that the Ewhurst Senior playing pitches were being used at 48% capacity and Junior pitches at 25% capacity.

A survey of informal use of Ewhurst playing fields in 2011 showed very low usage by the public despite good scores on environmental quality, safety and facilities. This survey identified Ewhurst as a high quality but low value site.

The play area is of poor quality and prone to flooding. The draft Play Strategy recommends improvements to this play area.

The value of Ewhurst Playing Fields

The value of the playing fields is a key part of understanding whether they are surplus to requirements. The value combines findings on quantity, access and quality/use to be able to make recommendations on the sites future. This has been broken down to each type of open space.

The site as a park and recreation ground:

The site can be used for informal recreation and community events. The evidence shows that the site is not well used for this purpose despite there being a deficit of this type of open space in Ifield. A poor quality site can mean low levels of use but in this case the site is of good quality. The reason for the low use is likely to be due to the proximity of similar uses that residents would prefer to visit. Most of Ewhurst's 12/13min walking catchment is also covered by the catchments of other parks.

These are:

West Green Park

This park has football and cricket facilities, car park, sports/social club, good play area. A good quality facility that is almost adjacent to Ewhurst playing fields but in a different neighbourhood.

Goffs Park

This is a high quality park with the Green Flag award which will attract residents from across the borough. It has a car park.

Ifield Green

A large site with football, cricket, good quality new play area, MUGA/Basketball court, changing rooms and a club house. Facilities are generally good quality. At the north of the site is a privately owned playing field which has an abandoned pavilion and pitches – consideration needs to be given to future of this site. This area is also connected to Ifield conservation area and into Ifield Brook Green which is popular for walkers.

Rusper Road

2 senior football pitches, no changing rooms, car park. Pitches are of average quality and undulate. Potential to improve this site or develop uses.

Cherry Lane

This is a major site with large playing fields for football and cricket, the pitches are generally good quality. There is a large car park, changing facilities, clubhouse, bowling green, tennis courts, play area, small cycle track. Next to the site is an adventure playground and good quality MUGA.

It seems that the reason Ewhurst is not well used is its proximity to a number of high quality multi-use parks. It is likely that residents close by Ewhurst will often choose to travel a little further to visit these sites because there is more for children or it is more interesting for walking.

The evidence shows that the impact of the loss of Ewhurst for informal recreation would be minimal.

The Sports Pitches

The amount of sports pitch space in Ifield is currently above the standard but would be below standard under the 2030 scenario. In practice most sports clubs draw players at the borough-wide level. Members of Crawley Wasps Girls who currently use Ewhurst Sports Pitches live borough-wide meaning that the location of the club in a reasonably central location with parking is important. Assessing whether a sports pitch is surplus, therefore, needs to consider:

a) Whether the teams can be absorbed into the remaining stock of pitches. This would need to be of equivalent or better quality in a suitable location.

b) That future needs for sports pitches can be met.

Crawley Borough Council Amenity Services have identified spare capacity at Grattons Park. Grattons Park has a good quality playing surface, changing rooms and a car park with good transport links to Crawley's neighbourhoods. This has been discussed with the club and there is agreement in principle that a move to Grattons Park playing pitches would meet the club's needs.

Whilst the immediate needs can be met the loss of the pitches would not be acceptable if it impacts the wider needs of the town for sports pitches to 2030. The Playing Pitch Study (2013) finds that there is sufficient existing capacity to meet the current peak demand taking into account a 10% increase (for fluctuations) and also the peak demand in 2030 based on the estimated population. However, the ability of the current pitch stock to absorb games over a period of time is not clear. The assessment shows that pitches are being overplayed in some neighbourhoods although this is a very rough estimate of 'actual' v 'ideal'⁸². Two football clubs said they did not have enough pitches for match days and three clubs not enough pitches for training. The individual responses show that this refers to a shortage of all-weather pitches, poor drainage of grass pitches, and restriction on development rather than actual shortage of pitches.

It seems possible that the loss of Ewhurst football pitches would not in itself lead to insufficient capacity but that the quality of remaining pitches/facilities may not be able to absorb the needs of clubs for training and matches over a period of time.

It seems reasonable to judge that if Ewhurst was retained it could be used to spread games over a greater number of pitches. In this sense Ewhurst's pitches play a role in meeting Crawley's sport and recreation needs. On the other hand, if the pitches were lost but other pitches surfacing/facilities were improved there would be no need for Ewhurst pitches to spread the load of games/training.

In conclusion, the loss of the sports pitches to meet development needs would only be acceptable alongside improvements that permanently enhance capacity elsewhere. This could be through:

1. Improvements to drainage to allow more games to be played to meet the lost capacity.

⁸² Playing Pitch Study 2013 p30 final paragraph

2. A new multi-use artificial pitch. This could be on an existing pitch as they can be used far more intensively.
3. Use of educational facilities. For example, there may be potential for greater use of Ifield Community College although it is already used by some sports clubs. “There needs to be better consultation links with private pitch providers, schools and colleges to explore potential usage of sites to ensure these sites are being used to full capacity.”⁸³

Ewhurst Place Play Area

The loss of the play area would lead to deficiencies in access to a play area for a small area of housing and also a small deficiency in quantity for Ifield neighbourhood by 2030.

There is currently no information on levels of use although the use of such data would be limited as the quality of the play area is below standard which may be discouraging residents from using it.

There is no clear surplus of children’s play space therefore it would need to be replaced by equivalent of better provision in terms of quality and quantity in a suitable location.

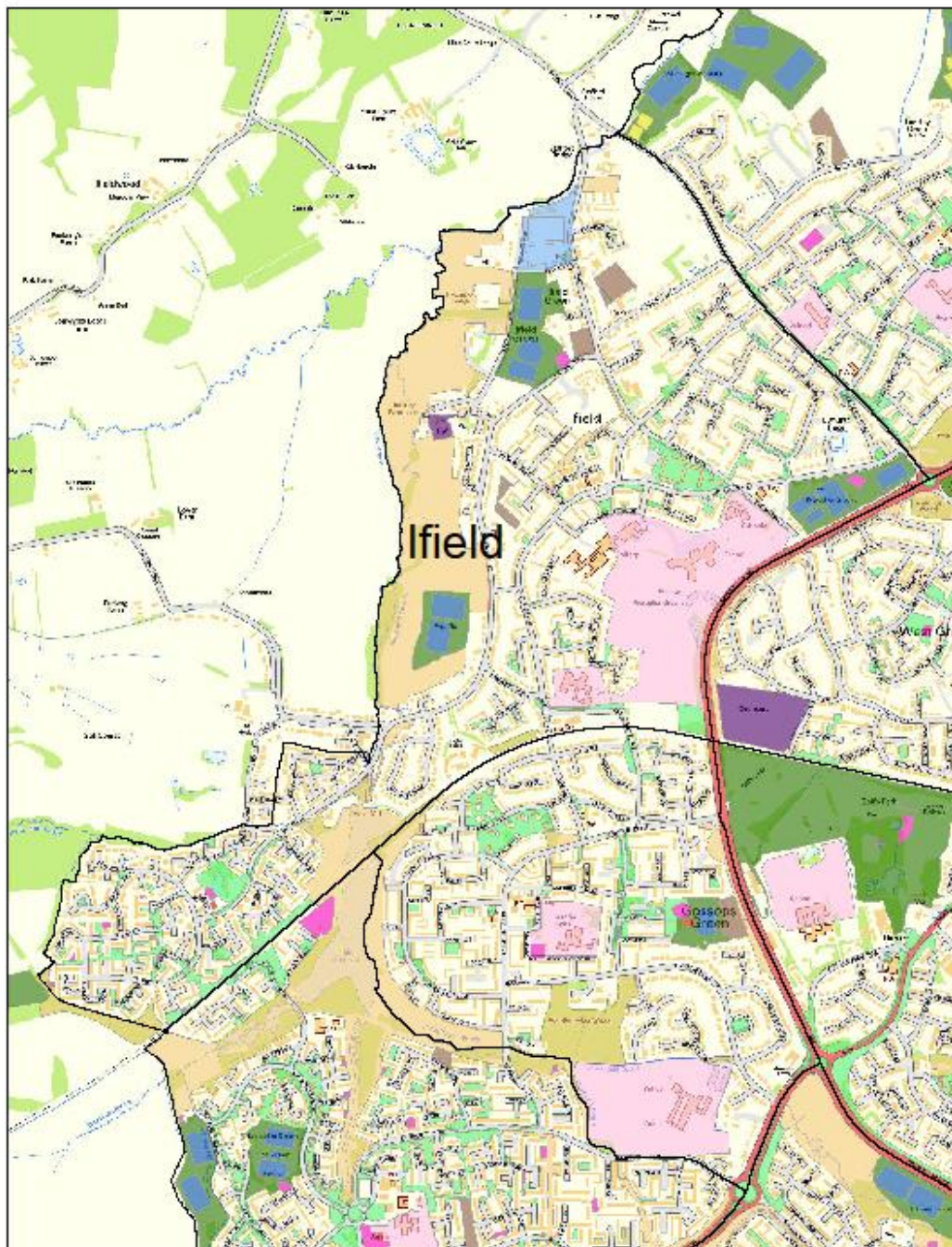
Relocating on a site that is accessible to nearby residents could be challenging, therefore, retention of the play area is preferred.

⁸³ A Playing Pitch Study for Crawley, 2013, p39, Sussex County FA comments.

Appendix E1

Types of Open Space in Ifield Neighbourhood

- | | | | |
|--|--|--|---|
|  Allotments |  Education |  Outdoor Sports Space (LA) |  Play Space (Children) |
|  Amenity Green Space |  Natural Green Space |  Outdoor Sports Space (Pitches) |  Play Space (Youth) |
|  Churchyards & Cemeteries |  Outdoor Sports Space (Fixed) |  Parks and Recreation Grounds | |



Appendix E2 - Consultation Summary

2008 Open Space Survey:

A survey was sent to 5000 households in 2008 asking questions about open space. 522 survey were returned. Below are the headlines for the relevant types of open space:

- About 75% (46-70% benchmark) felt the current provision of Parks and Gardens was about right.
- About 52% (31-35% benchmark) felt the current provision of Sports Pitches was about right.
- About 36% (26-37%) of people felt the current provision of Children's Play Areas was not enough.

This conclusion of the above survey was that existing provision broadly met local demand in the borough.

Sites Allocation consultation (June 2013):

In total 2,068 people took part in the Crawley 2029 consultation. 63% (1298) of those specifically answered the question relating to the cemetery.

Overall people were divided about whether Ewhurst playing field was a good site for a cemetery. 49% of respondents did not agree with the proposal whilst 35% agreed, the remaining 16% didn't know whether a cemetery should be located on Ewhurst Playing Fields. The response to the consultation was not overwhelmingly against the proposal.

Respondents who completed this part of the questionnaire were mainly drawn from the areas affected by the proposed additional sites in the overall consultation, namely Ifield, Langley Green, Bewbush and Broadfield. However, views were captured from people living across all neighbourhoods although they were fewer in number than those listed above.

The main comments relating to the open space were:

- Whether playing fields should be used for development, particularly when there is a view that they are well used.
- People would like to see some land retained for recreational use.
- The loss of open space would not help tackle childhood obesity.
- That it would deny young and old the opportunity to enjoy recreational activities.



Ewhurst (housing)

The above assessment explores the impact of the loss of open space if it were to be replaced with a cemetery. To assess the impact of housing, the additional impact of the increased population upon remaining open space should be considered.

The total open space is just over 4ha including treed areas and the pavilion. If the whole site were to be developed for housing with the same density as proposed at Tinsley Lane or Breezehurst Drive it is estimated that approximately 220 dwellings could be built. With a 2.49 (2011 Census) occupancy this would equate to a population increase of 548.

The impact on open space provision of this population increase including other sites over the Plan period within Ifield (see SHLAA) is shown below:

Year	Allotments	Amenity Green Space	Parks and Recreation Grounds (public)	Parks and Recreation Grounds (public and private)	Outdoor Sports Space (Pitches)	Natural Green Space	Play Space (Youth)	Play Space (Children)
2030	0.20	1.59	-12.02	-9.13	-2.81	13.91	-0.17	-0.18

It may be that housing occupation levels in Ifield change, the density of development could be lower and the retention of the play area would lessen the impact. However, the quantities above are a reasonable estimate and significant deficits show that there is insufficient open space within Ifield to meet the needs of its population.

An important factor, however, is that the above analysis is limited to the boundary of Ifield neighbourhood. There are a number of parks adjacent to the neighbourhood that could be used by Ifield residents who are within the accessibility standard of 12/13minute walk.

The question to answer is, therefore, whether these accessible pitches beyond Ifield’s boundary have the capacity to meet the needs of Ifield residents as well as the neighbourhood they are situated in. This is explored as part of the cemetery assessment on pages 31-34. The conclusions from the cemetery assessment apply but the increased population from a housing development would mean the need to enhance capacity on nearby sports pitches is even more critical.

It is also clear that the play area would need to be retained onsite or replaced nearby to meet the access needs of the occupants of the new dwellings and those surrounding it.

Land East of Brighton Road

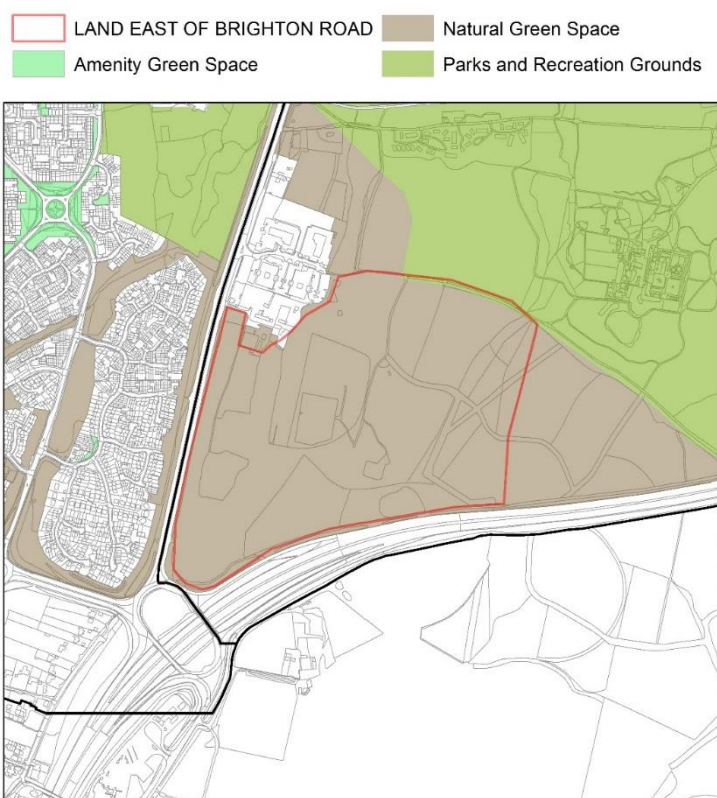
This site was included in the SHLAA and highlighted as needing further assessment to consider its suitability for housing. Land East of Brighton Road was therefore included in the Site Allocation consultation.

The following assessment first looks at the site in light of the Open Space Sport and Recreation Study⁸⁴ and then summarises the local and national designations/policies that cover the area.

Site and surrounding area

In open space terms the site is classed as Natural Green Space and covers 33.5ha. This typology covers areas which have natural characteristics and wildlife value, and are wholly or partly accessible spaces. The area is mainly under ownership of the forestry commission which is accessible to the public. A small strip of private land with no access is adjacent to the A23. The maps below shows the site and the types of open space in and around that area.

The site is part of the larger Tilgate Country Park. This is a major facility for the borough and wider area. It has a range of facilities including a nature centre, walled garden, cafe, car parks, play areas lakes and fishing, mountain biking, and the wider park area for information recreation such as walking and running.



⁸⁴ Open Space, Sport and Recreation Study, Crawley Borough Council, JPC Planning and Leisure and the Environment (2013)

 LAND EAST OF BRIGHTON ROAD



Natural & Semi Natural Green Space Standards

Natural England has proposed national guidance on an Accessible Natural Green Space Standard (ANGSt) which suggests at least 2ha per 1000 people. The existing average level of provision across Crawley borough is 2.83/1000 people. The open space consultation found that around 40% of people felt there was not enough and about 50% felt provision was about right. The open space study recommends the ANGSt standard of 2 ha per 1000 people is adopted and uses this as a tool for assessing the current spread of provision.

Using this standard on a borough-wide basis there is currently 88ha over- provision of Natural Green Space. The loss of the East of Brighton Road space would leave an overprovision of 54.5ha. With forecasted population increase to 2030, the loss of the East of Brighton Road space would leave an overprovision of 33.50ha.⁸⁵

⁸⁵ Open Space, Sport and Recreation Study, Crawley Borough Council, JPC Planning and Leisure and the Environment (2013) page 66 table 6&7.

The open space study states that the following areas should be given the highest level of protection by the planning system:

Areas that are:

- Critically important in avoiding deficiencies in accessibility, quality or quantity: or
- Of particular nature conservation, historical or cultural value. (p.110)

Recommendation OS3 (p111) states “sites which have significant nature conservation, historical or cultural value should be afforded protection, even if there is an identified surplus in quality, quantity or access in that area.”

The study goes on to say that before any decision to release open space for alternative uses can be taken the “*local value and use of a given open space – as it may be a popular local resource*” (p115).

Value

The value of the site is a combination of factors. The level and type of use, as well as the wider benefits. These include; structural landscaping, ecological, educational, social inclusion and health, cultural and heritage, amenity (sense of place) and also economic benefits. A map of planning designations is located at the end of this assessment.

The following factors must be considered in assessing the value of the site:

- The site is part of Tilgate Country Park and also forms the setting to the park’s main features such as the walled garden, formal parkland and the area designated as a locally important historic park and garden.
- The site outside the built up area of Crawley largely separate from Crawley’s urban area within Tilgate Forest Rural Fringe. The Crawley Landscape Character Assessment states:

*Tilgate Country Park and Worth Conservation Area/Worth Way Site of Nature Conservation Importance should be protected for its high landscape value and potentially improved green infrastructure links to other areas.*⁸⁶

- The site contains a large area of ancient woodland and almost 100% tree cover. A number of protected species have been recorded in this area.⁸⁷

⁸⁶ Crawley Landscape Character Assessment, Crawley Borough Council, (2012), p21

⁸⁷ West Sussex SSCI Management Plan, West Sussex County Council (2006)

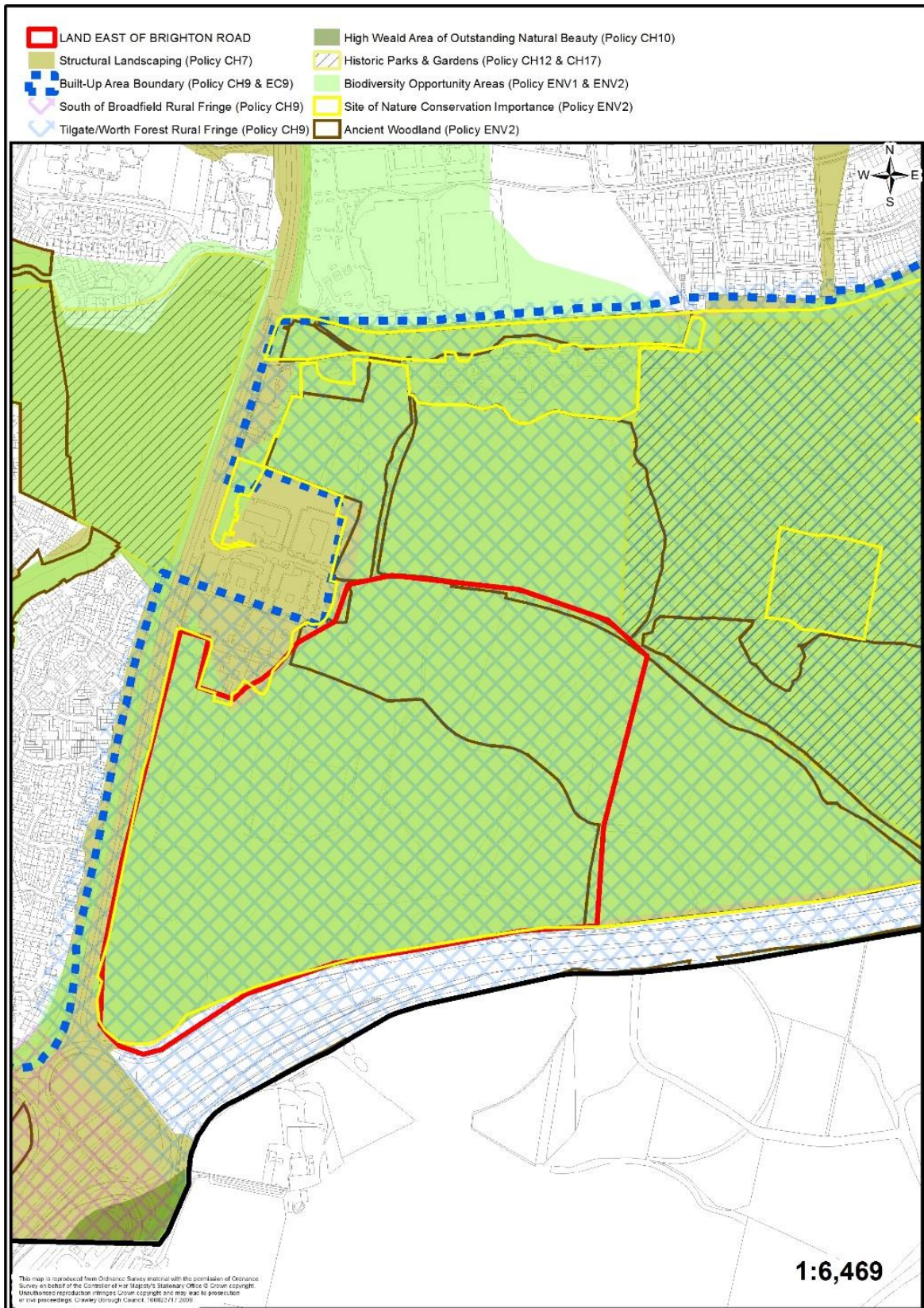
- Much of the area is used for informal recreation and also forms the setting to the rest of the Country Park which is one of the most popular recreational areas in the region. The loss of open spaces and recreational space would undermine the encouragement of active lifestyles and harm the sense of place which characterises a country park.
- The loss of trees, natural surrounds and loss of green space means that there would be a negative impact on adaption to climate change.

Conclusion

In light of the above, it is considered that the identification of the site as a housing allocation will undermine the significant value of the site reflected by the importance and number of wider benefits of the area and its setting. Development of this site would significantly and adversely impact upon the role and character of Tilgate Country Park.

There are further opportunities to enhance the role this area plays in the success of Tilgate Country Park for example natural play areas, BMX tracks and signed route ways.

Planning Designations



Cherry Lane (Langley Green)

This report builds on the findings of the Open Space, Sport and Recreation Study⁸⁸ (2013) which considered that “over supply of parks and recreation grounds may provide an opportunity for areas to have alternative uses or re-designation as other types of open space”(page 86).

It was found that “Proposed development in the neighbourhood will have a minor impact on existing open space provision”. The amounts of open space existing and with SHLAA sites included are summarised below.

Year	Allotments	Amenity Green Space	Parks and Recreation Grounds (public)	Parks and Recreation Grounds (public and private)	Outdoor Sports Space (Pitches)	Natural Green Space	Play Space (Youth)	Play Space (Children)
2011	-0.08	-0.33	9.17	9.17	3.78	-11.34	0.19	0.08
2030	-0.10	-0.40	8.94	8.94	3.72	-11.62	0.19	0.07

The Open Space study also assessed the quality of Cherry Lane Playing Fields:

“This is a major site with large playing fields for football and cricket, the pitches are generally good quality. There is a large car park, changing facilities, clubhouse, bowling green, tennis courts, play area, small cycle track. The site has some valuable hedgerows and trees. Next to the site is an adventure playground and good quality MUGA. Overall the site is an important asset for protection and enhancement” (page 86).

In light of the above information, it was considered that a closer look at Cherry Lane was required to explore its potential as a housing allocation.

A survey of pitch bookings against capacity and informal use of playing fields was undertaken by the council in 2010. Reviewing this showed that Cherry Lane had the second highest score for use/demand of a playing field in the borough after Southgate Park. Pitch bookings were amongst the highest in the borough. Overall, Cherry Lane playing fields were classed as high quality/high value.

The above information seems to suggest that, despite the oversupply of parks in Langley Green, it is a high quality site that is well used. This is because the site serves a much wider population than that of Langley Green residents due to the strategic and diverse nature of the site accommodating most types of sport. The sports pitches, bowling green, tennis courts, cycle track and adventure playground could all be visited from the adjacent neighbourhoods of Ifield, West Green, Northgate and possibly further afield.

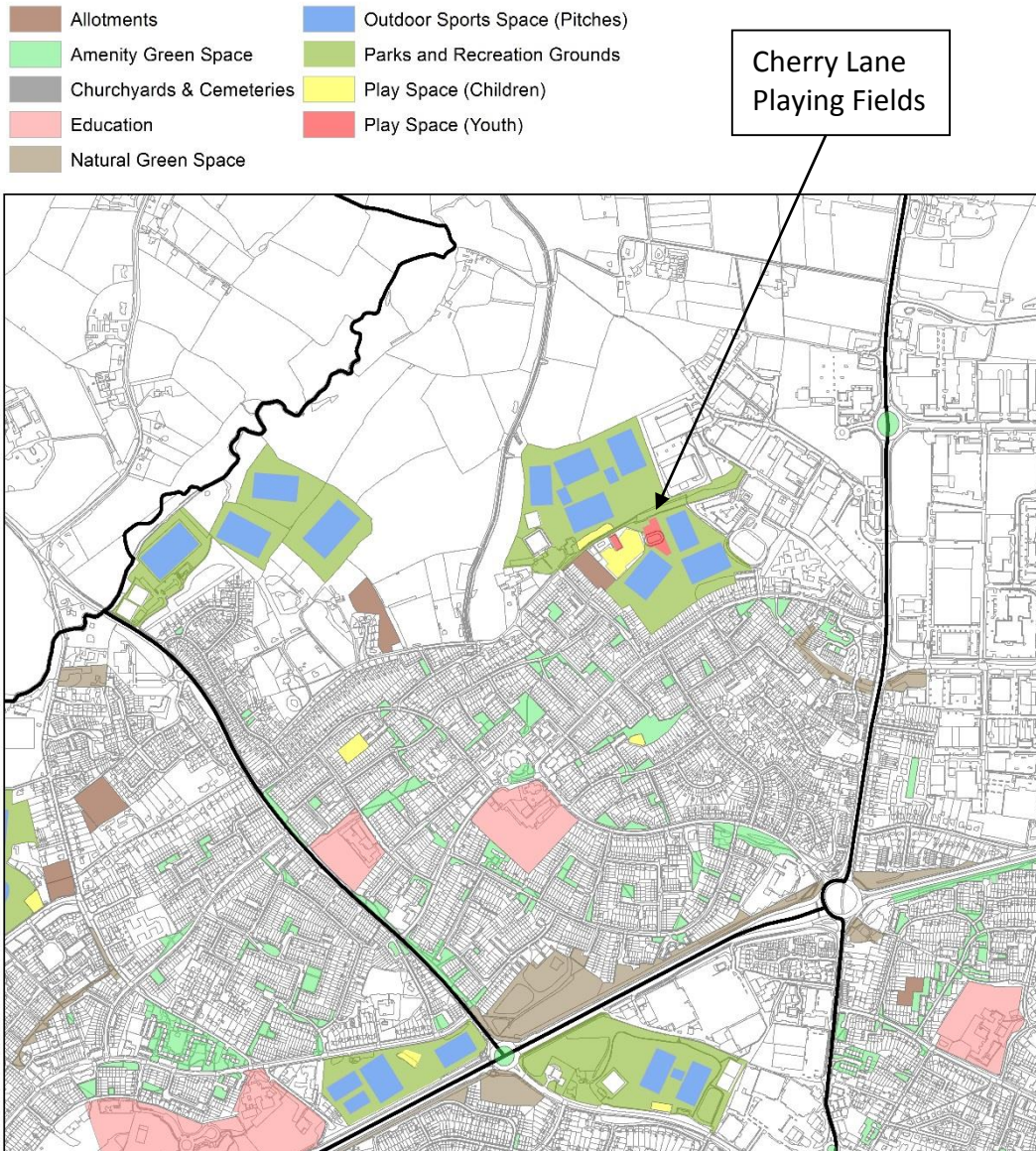
⁸⁸ Open Space, Sport and Recreation Study, Crawley Borough Council, JPC Planning and Leisure and the Environment (2013)

The above information was considered sufficient justification to not put forward as a possible housing allocation. It was presented a rejected housing site as part of the Site Allocation consultation to show that it had been considered. 78% (861) of residents agreed that the site should not be included and 10% (111) disagreed and considered that site should be included.

Site Future

The scale of the site should be maintained to ensure that it continues to serve a wide catchment and support a diverse range of activities. Its proximity to Manor Royal Business Park may provide scope for facilities to support businesses.

Types of Open Space in Langley Green



Appendix C

Five Year Housing Land Supply

A) 2015 – 2020 Five year land supply requirement calculation based on minimum housing requirement identified in Policy H1 (5,010 dwellings)

	Annualised Net Delivery Rate
2015-16	334
2016-17	334
2017-18	334
2018-19	334
2019-20	334
Total	1,670
5% NPPF buffer	17
Annual Requirement with 5% buffer	351
5 Year Land Supply Requirement 2015-2020	1,755

B) 2015-2020 Identified Land Supply as indicated in Housing Trajectory at 30 September 2014

	Five Year Supply
2015-16	599
2016-17	601
2017-18	719
2018-19	427
2019-20	389
Includes Windfall Allowance of 275 dwellings	
Total Supply	2,735
Years' Supply	7.8