

# **CRAWLEY BOROUGH LOCAL PLAN EXAMINATION**

Crawley Borough Council Response to Inspector's  
Matters, Issues and Questions

Matter 3: Housing  
Issue 2: Housing Supply  
Appendices

February 2015



*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

## **MATTER 3: HOUSING; ISSUE 2: HOUSING LAND SUPPLY APPENDICES**

### **CONTENTS:**

<b>Appendix A</b>	<b>Prior Approval PA3 Data</b>
<b>Appendix B</b>	<b>Position Statement for Policy H2 Allocated Housing Sites</b>
<b>Appendix C</b>	<b>SHLAA Appraisals, Viability Update 2015</b>
<b>Appendix D</b>	<b>Forge Wood Delivery Trajectory</b>
<b>Appendix E</b>	<b>Tinsley Lane Open Space Summary</b>
<b>Appendix F</b>	<b>Correspondence between Oakwood Football Club and Homes and Communities Agency (HCA)</b>
<b>Appendix G</b>	<b>Breezehurst Drive Open Space Council Response to Representations</b>
<b>Appendix H</b>	<b>SHLAA Extract for Oakhurst Grange</b>
<b>Appendix I</b>	<b>The Worth Conservation Area Statement</b>
<b>Appendix J</b>	<b>Worth Meadows Site of Nature Conservation Importance, West Sussex County Council</b>
<b>Appendix K</b>	<b>Written Response from English Heritage regarding Land East of Street Hill, Worth (2014)</b>
<b>Appendix L</b>	<b>Written Response from West Sussex County Council regarding Land East of Street Hill, Worth (2015)</b>
<b>Appendix M</b>	<b>SHLAA Extract for Land adjacent Horsham Road and South of Silchester Drive</b>

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

## APPENDIX A: PRIOR APPROVAL PA3 DATA

Application Number	Location	Proposal	Decision Date	Decision	Progress	Dwellings Created
CR/2015/0068/PA3	BARTON HOUSE, BROADFIELD BARTON, BROADFIELD, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 10 X STUDIO FLATS AND 2 X 2 BED FLATS		Awaiting Decision		12
CR/2015/0067/PA3	FLIGHT HOUSE, FERNHILL RD HORLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 6X 2 BED FLATS		Awaiting Decision		6
CR/2014/0847/PA3	40 QUEENS SQUARE, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM OFFICE (B1) TO RESIDENTIAL (C3) FOR 4 X 1 BED FLATS & 2 X STUDIO FLATS		Awaiting Decision		6
CR/2015/0090/PA3	ASHBURN HOUSE, BROADFIELD PARK, BRIGHTON ROAD, BROADFIELD, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 92 RESIDENTIAL UNITS. 88 X STUDIO AND 4X 1 BED		Awaiting Decision		92
CR/2015/0004/PA3	11 THE BOULEVARD, SOUTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 173 FLATS (15 X STUDIOS, 74 X 1 BED & 84 X 2 BED)	25/02/2015	Approve		173
CR/2014/0786/PA3	10 THE COURTYARD EAST PARK, SOUTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 1 X 1 BED HOUSE	09/01/2015	Not Required	Not Started	1
CR/2014/0712/PA3	BELGRAVE HOUSE, STATION WAY, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 16 X SELF CONTAINED FLATS	18/12/2014	Approve	Not Started	16
CR/2014/0543/PA3	THE OFFICE BUILDING, GATWICK ROAD, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 22 FLATS (13 X 1 BED & 9 X 2 BED)	03/10/2014	Approve		22
CR/2014/0524/PA3	FIRST CHOICE HOUSE, LONDON ROAD, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 94 X 1 & 2-BED APARTMENTS	10/09/2014	Approve	Work Commenced.	94
CR/2014/0438/PA3	BIRCHFIELD HOUSE, IFIELD ROAD, WEST GREEN, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 1 X 3 BED HOUSE	14/08/2014	Not Required		1
CR/2014/0391/PA3	8A BRIGHTON ROAD, SOUTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL)	01/08/2014	Not Required		1
CR/2014/0343/PA3	BRAMBLETYE HOUSE, 29 BRIGHTON ROAD, SOUTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 4 X 1-BED & 3 X 2-BED FLATS	10/07/2014	Approve		7
CR/2014/0236/PA3	6A THE BROADWAY, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE OF FIRST FLOOR FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 1 X 1 BED FLAT (AMENDED DESCRIPTION).	11/06/2014	Not Required	Complete and Occupied	1

CBC/004 Matter 3 Housing; Issue 2 February 2015

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

CR/2014/0181/PA3	NORTHGATE HOUSE, 115 HIGH STREET, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM OFFICE (B1) TO RESIDENTIAL (C3) (7 X ONE BED & 7 X TWO BED)	23/05/2014	Not Required	Not Started	14
CR/2014/0159/PA3	SHAW HOUSE, PEGLER WAY, WEST GREEN, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM OFFICE (B1) TO RESIDENTIAL (C3) (10 X ONE BED & 16 X TWO BED)	01/05/2014	Approve	Not Started	26
CR/2014/0138/PA3	STONER HOUSE, LONDON ROAD, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM OFFICE (B1) TO RESIDENTIAL (C3) 76 FLATS (72 X 1 BED & 4 X 2 BED) (AMENDED DESCRIPTION)	28/04/2014	Approve	Work Commenced. Scheduled for completion 2016	76
CR/2014/0005/PA3	REAR GROUND, FIRST AND SECOND FLOORS, THE CORN EXCHANGE, 61 - 63 HIGH STREET, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM OFFICE (B1) TO 11 X TWO BED FLATS (C3)	05/03/2014	Approve	Not Started	11
CR/2013/0482/PA3	8 THE BROADWAY, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICES) TO C3 (RESIDENTIAL FLATS) 1 X ONE BEDROOM AT FIRST FLOOR & 1 X TWO BEDROOM AT SECOND FLOOR (AMENDED)	12/11/2013	Not Required	Complete	2
CR/2013/0347/PA3	ST ANDREWS HOUSE, 26 BRIGHTON ROAD, SOUTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 6 X ONE BED APARTMENTS	28/08/2013	Approve		6
CR/2013/0332/PA3	UNITS 1-14, PELHAM COURT BUSINESS CENTRE, PELHAM PLACE, BROADFIELD, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICES) TO C3 (RESIDENTIAL)	04/09/2013	Approve	17 Flats complete and occupied. Rest to be completed summer 2015	28
CR/2013/0291/PA3	DSS CRAWLEY BENEFITS OFFICE THE TREASURY VALUER, CROWN BUILDINGS, 5 THE BOULEVARD, NORTHGATE, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL APARTMENTS)	08/08/2013	Approve	Work Commenced	24
CR/2013/0270/PA3	36 ALPHA ROAD, WEST GREEN, CRAWLEY	PRIOR APPROVAL FOR CHANGE OF USE FROM B1 (OFFICE) TO C3 (RESIDENTIAL) FOR 1 X FOUR BED HOUSE	19/07/2013	Not Required		1
<b>Totals</b>						<b>620</b>

## APPENDIX B: POSITION STATEMENT FOR POLICY H2 ALLOCATED HOUSING SITES

Please note that reference to representations is only in relation to specific sites. However, in general terms concerns were raised from a number of representors over the deliverability of all sites in policy H2.

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
Forge Wood, Pound Hill  1900 dwellings  (Yrs 1-12)	Persimmon Homes and Taylor Wimpey	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Work started on site</li> <li>• Phase 1a has detailed planning consent with construction of the first 215 houses underway. Phase 1c (39 dwellings) has detailed consent and the application for Phase 1b (43 dwellings) has been submitted.</li> <li>• Phasing in the Housing Trajectory has been agreed with the development consortium, with an updated delivery phasing plan agreed in February 2015.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Outline Planning consent for 1900 dwellings (CR/1998/0039/OUT)</li> <li>• Phase 1 (CR/2014/0062/ARM)</li> <li>• Phase 1a (CR/2013/0610/ARM)</li> <li>• Phase 1b (CR/2014/0061/ARM)</li> <li>• Phase 1c (CR/2014/0062/ARM)</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• Package of Highway and Transport measures to be delivered- developer conditions with some under construction</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• Site identified on inspector's Matters and Issues for discussion</li> </ul>
Breezehurst Drive, Bewbush  112 dwellings  (deliverable Yrs 1-5)	Countryside Properties UK  (Council own Build)	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Work started on site</li> <li>• Slight delay, as defected units needed to be demolished but work has commenced again (WSCC Monitoring Commencements Oct-Dec). Completion anticipated early 2016.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Planning permission granted (CR/2013/0066/FUL)</li> </ul>

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
		<p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• Planning permission granted</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• No representations received</li> </ul>
<p>Ifield Community College, Ifield</p> <p>125 dwellings</p> <p>(deliverable Yrs 1-5)</p>	<p>Barratts (developer)</p> <p>WSCC (landowner)</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Developer in detailed pre- application discussions with the council for approximately 200 dwellings</li> <li>• Barratts holding a public consultation event in early March</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Site previously allocated in Core Strategy (2008) as a Strategic Development Opportunity.</li> <li>• Planning permission granted in 2006 for a mixed use development of 170 dwellings (CR/2006/0339/OUT) but this has now expired.</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• Highways and parking issues to be resolved with WSCC</li> <li>• Full TA required</li> <li>• Access proposed from Lady Margaret Rd (previously controversial but application was permitted)</li> <li>• Off-site highway capacity improvements likely to be required and resolve unfinished layby parking issues</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• Sport England- site identified on Inspectors Matters and Issues for discussion</li> </ul>
<p>Southern Counties, West Green</p> <p>218 dwellings</p> <p>(deliverable Yrs 1-5)</p>	<p>Sloane properties Ltd</p> <p>Pegasus Group (as agent)</p> <p>Henry Courtier</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Awaiting decision on application CR/2015/0087/FUL submitted in February 2015 for 171 x residential dwellings, 51 x Bed Hotel and 15 x Bed Apart Hotel.</li> <li>• Decision expected in May 2015.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Previous Planning permission (for the 218 units identified in the housing trajectory)</li> </ul>



Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
		<ul style="list-style-type: none"> <li>Site identified in the Town Centre Wide SPD 2009 for landmark mixed development with a priority for residential</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>No H&amp;T Objections to date</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>No submission reps received.</li> </ul>
<p>Land Adj. Desmond Anderson, Tilgate</p> <p>100 dwellings (deliverable Yrs 1-5)</p>	WSCC	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>WSCC owned site and committed to bringing site forward within years 1-5.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>Site previously allocated in Core Strategy (2008) for residential development</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>Access proposed from Canterbury Rd</li> <li>Full TA required</li> </ul> <p><b>Infrastructure (Other)</b></p> <ul style="list-style-type: none"> <li>Flooding Constraints, the council have reduced the number of dwellings (previously 200) and developer has agreed to undertake further work (flood attenuation)</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>No submission reps received.</li> </ul>
<p>Fairfield House, West Green</p> <p>93 dwellings (deliverable Yrs 1-5)</p>	A2 Dominion Group	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>Developer committed and work expected to start in April 2016.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>Outline planning permission granted (CR/2011/0189/OUT) for 93 dwellings, minor amendment (CR/2014/0317/NCC) for a revised layout and elevations resulting in a reduction from 93 to 92 dwellings.</li> </ul>

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
		<p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>No H&amp;T objections</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>No submission reps received.</li> </ul>
<p>15-29 Broadway Upper Floors, Northgate</p> <p>57 dwellings</p> <p>(deliverable Yrs 1-5)</p>	<p>UMIS Ltd</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>Start anticipated in 2018/19.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>Planning permission (CR/2013/0015/FUL) granted for 57 dwellings.</li> <li>Site identified in the Town Centre Wide SPD 2009 as part of a wider site for redevelopment /refurbishment</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>No H&amp;T Objections</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>No submission reps received.</li> </ul>
<p>Kilnmead Car Park, Northgate</p> <p>40 dwellings</p> <p>(deliverable Yrs 1-5)</p>	<p>HCA/CBC</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>Council has approved acquisition of the site and is committed to bringing the site forward for housing in years 1-5.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>Site was previously allocated as part of Town Centre North in Core Strategy 2008.</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>TA required, focusing on parking provision</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>HCA in support</li> </ul>

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
<p>Zurich House, East Park, Southgate</p> <p>59 dwellings</p> <p>(deliverable Yrs 1-5)</p>	<p>Marcity Homes</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Developer is currently undertaking pre application discussions with the council for a revised scheme</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Planning permission approved (CR/2012/0223/FUL) for 59 flats in December 2013.</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• No H&amp;T Objections</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• No submission reps received.</li> </ul>
<p>Tinsley Lane, Three Bridges</p> <p>138 dwellings and Open Space</p> <p>(deliverable Yrs 1-5)</p>	<p>Homes and Communities Agency (HCA)</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Landowner in detailed discussions with the council and WSCC</li> <li>• Site allocated for 138 dwellings and the provision of open space including the relocation of Oakwood Football Club to the north with enhanced sport facilities and improved access.</li> <li>• In collaboration with the council, the landowner has undertaken a significant amount of technical studies including open space, acoustic, air quality, and transport and contamination surveys to demonstrate the suitability of the site, (with supporting mitigation) for housing.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Provisionally allocated in the Core Strategy (2008) but, due to uncertainties over deliverability at the time the site was removed.</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• Transport Assessments undertaken by landowner in consultation with WSCC (see Appendices 4-5 of the HCA's (REP/079) Representation to the Local Plan consultation)</li> <li>• General principle of development is acceptable. However, a full TA would be required at the planning application stage.</li> </ul>

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
		<p><b>Infrastructure (Other)</b></p> <ul style="list-style-type: none"> <li>Issues to be resolved and/or mitigation required, open space/sports provision, drainage, noise, air quality.</li> </ul> <p><b>Representations</b> In SUPPORT:</p> <ul style="list-style-type: none"> <li>Savills, on behalf of HCA</li> </ul> <p>Representations Received OBJECTING:</p> <ul style="list-style-type: none"> <li>Crawley Goods Yard x 3</li> <li>Tinsley Lane Residents Association</li> <li>Sport England</li> </ul>
<p>Goffs Park Depot, Southgate</p> <p>30 dwellings</p> <p>(deliverable Yrs 1-5)</p>	<p>CBC</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>Site is in Council ownership. CBC Property Team committed to bringing the site forward in years 1-5.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>Site previously used as a Council depot for the Parks team.</li> <li>Outline application (CR/2009/0114/RG3) for demolition of the existing depot and construction of a new depot, incorporating offices, maintenance bays, vehicle storage and 4 dwellings permitted.</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>The council undertook its own Transport Modelling Assessment and site considered suitable to accommodate the allocation for 30 dwellings.</li> <li>No H&amp;T Objections</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>No submission reps received.</li> </ul>
<p>Former TSB Site, Russell Way, Three Bridges</p> <p>40 dwellings</p>	<p>Aberdeen Investments (TSB site)</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>Landowner in pre-applications discussions with the Council</li> </ul>

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
(deliverable Yrs 1-5)		<ul style="list-style-type: none"> <li>• Prospect for a wider mixed use, residential /employment scheme incorporating land to the west of the site.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Site is located within a main employment area of Three Bridges.</li> <li>• A Planning application (CR/2005/0812/FUL) for 270 dwellings approved on appeal in 2006.</li> <li>• A time extension to the previous application was submitted in 2010 (CR/2010/0313/FUL) and went to appeal having been refused on design and scale grounds and its impact on the privacy of neighbouring properties. However, this was withdrawn by the applicant.</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• No H&amp;T Objections subject to highway works in the turning head to remove car parking and protect the link to the adjoining cycle path.</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• Landowner-Aberdeen Investments/Savills and site identified on Inspector's Matters and Issues for discussion</li> </ul>
Land Adj. Langley Green Primary School, Langley Green  30 dwellings  (deliverable Yrs 1-5)	Raven	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Raven have secured the site with Croudace aimed at a mixed tenure scheme. Completion expected in 2016.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Application submitted and approved in May 2014 (CR/2014/0046/FUL) for 30 dwellings, 20 houses and 10 flats.</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• No H&amp;T Objections</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• No submission reps received.</li> </ul>

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
5-7 Brighton Road, Southgate  48 dwellings  (deliverable Yrs 1-5)	Raglan Developments	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>Raglan has started works on site and likely to be completed in 2016.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>Planning permission granted for 48 dwellings (CR/2012/0446/ARM)</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>No H&amp;T objections</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>No submission reps received.</li> </ul>
WSCC Professional Centre, Furnace Green  76 dwellings  (deliverable current Yr 14/15)	Barratts Southern Counties	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>Work on the site is almost complete.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>Planning permission granted for 76 dwellings (CR/2012/0253/ARM)</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>No H&amp;T Objections</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>No submission reps received.</li> </ul>
Breezehurst Drive Playing Fields, Bewbush  65 dwellings  (Developable Yrs 6-10)	CBC  Site for consideration under bulk procurement package 2015/16	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>Site owned by the council and being actively progressed</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>The site is allocated for the provision of open space and housing</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>Access needs to be from Breezehurst Drive</li> <li>No H&amp;T Objections</li> </ul>

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
		<p><b>Representations</b> Objections received:</p> <ul style="list-style-type: none"> <li>• Charles Crane</li> <li>• Sport England</li> </ul> <p>Site identified on Inspector's Matters and Issues for discussion</p>
<p>Henty Close, Bewbush</p> <p>24 dwellings</p> <p>(Developable Yrs 6-10)</p>	CBC	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Site owned by the council and being actively progressed</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Number of dwellings reduced from 48 to 24 after concerns were raised by the local community to the loss of open space and playing pitches during the additional sites consultation in 2013</li> <li>• Play area will need to be replaced as part of the development</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• A future new bus link into Kilnwood Vale is to be provided along with southern development frontage of the site and this must be taken into account</li> </ul> <p><b>Representations</b> Objections received:</p> <ul style="list-style-type: none"> <li>• Charles Crane</li> </ul> <p>Site identified on Inspector's Matters and Issues for discussion</p>
<p>Longley Building, Southgate</p> <p>48 dwellings</p> <p>(Developable Yrs 6-10)</p>		<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• The building is currently occupied and the council will continue to discuss plans for redevelopment with the landowner</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Site currently partially occupied (offices)</li> <li>• Application for part of the ground floor, D1 medical consulting and counselling refused in July 2014.</li> </ul>

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
		<p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• Site adjoins Zurich House which has extant planning permission for 59 dwellings.</li> <li>• TA required to ensure the increased use of East Park and on street parking would be acceptable.</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• No submission reps received.</li> </ul>
<p>Telford Place, Three Bridges</p> <p>99 dwellings</p> <p>(TC Opportunity site Yrs 1-5)</p>	<p>Development Securities</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• In discussion with the council, the landowner is currently exploring a number of options for redevelopment of the site.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Site previously allocated for mixed use development in the Core Strategy (2008)</li> <li>• Planning permission granted in 2007 for a mixed use development of residential and retail uses for 312 dwellings. This has now lapsed.</li> <li>• Temporary planning permission for public parking (CR/2012/0421/FUL) for 24 months.</li> <li>• Site identified in the Town Centre Wide SPD 2009 for landmark mixed use office /residential</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• No H&amp;T Objections, providing a link is provided to Haslett Avenue East.</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• Representation received from Moat in support of Policy EC6 of the Local Plan in relation to residential development in the Town Centre (Telford Place).</li> </ul>
<p>Crawley Station and Car Parks</p> <p>(TC Opportunity site Yrs 1-5)</p> <p>300 dwellings</p>	<p>Arora International-</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Council involved in active detailed pre application discussions with Landowner for residential scheme and station improvements.</li> <li>• Landowner committed to bringing the site forward in Yrs 1-5</li> </ul>



Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
		<p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Site identified in TC Wide SPD 2009 for landmark office /residential development with station and public realm improvements</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• Full TA required</li> <li>• No H&amp;T objections in principle</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• No submission reps received.</li> </ul>
<p>County Buildings</p> <p>50 dwellings</p> <p>(TC Opportunity site Yrs 1-5)</p>	<p>WSCC</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Owned by WSCC who are currently exploring options for redevelopment of the site.</li> <li>• Intentions for mixed use residential /office development</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Site previously allocated as part of Town Centre North site in Core Strategy 2008</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• Full TA required, but no H&amp;T objections in principle.</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>• No submission reps received.</li> </ul>
<p>Land North of the Boulevard (Royal Mail, Woodhall Duckham House, Town Hall)</p> <p>50 dwellings</p> <p>(TC Opportunity site Yrs 1-5)</p>	<p>Royal Mail, West Rock, CBC</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>• Prior approval application for 173 dwellings approved on 25 Feb 2015.</li> <li>• Pre-application discussions with landowners and developers for other parts of the site</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Previously formed part of the Town Centre North allocation in Core Strategy 2008</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>• Full TA required, but no H&amp;T objections in principle.</li> </ul>

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

Key Housing Site	Contact (Developer/ Landowner/ Agent)	Status
		<p><b>Representations</b></p> <ul style="list-style-type: none"> <li>No submission reps received.</li> </ul>
<p>Gales Place</p> <p>13 Units</p> <p>(Deliverable 6-29 units)</p>	<p>CBC</p>	<p><b>Development Status</b></p> <ul style="list-style-type: none"> <li>Work expected to commence early 2016</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>Application in for 13 units approved (CR/2014/0777/FUL) in February 2015 (Committee Decision)</li> <li>3x 2 Bed and 3x 1 bed Flats</li> <li>5x 2 Bed and 2x 3 Bed Houses</li> </ul> <p><b>Infrastructure (Highways)</b></p> <ul style="list-style-type: none"> <li>No H&amp;T Objections to date</li> </ul> <p><b>Representations</b></p> <ul style="list-style-type: none"> <li>No submission reps</li> </ul>

## APPENDIX C: SHLAA Appraisals, Viability Update 2015

### SHLAA Viability Assessments

The following amendments have been made to the SHLAA assessments in response to a number of issues raised by respondents during the Local Plan consultation process.

- The viability of the full Affordable Housing policy requirement of 40% Affordable Housing plus 10% Discount Market Housing has been tested
- The brownfield site appraisals have all been altered to reflect the likelihood that brownfield sites are likely to deliver primarily apartment developments
- Three additional sites have been appraised (Crawley station, County Buildings and Land north of the Boulevard)
- An additional S106 allowance of £1000 per dwelling has been added to every site appraisal
- The Construction rates have been altered to equivalent of CoSH3 to reflect Policy ENV5. An additional allowance of £2500 per dwelling has been made to cover the full impact of current Building Regulations, alterations to the Regulations to replace Construction codes in the near future and any additional costs arising from ENV6, ENV7 and ENV9.
- The Indexation on costs and values has been removed on the 0-5 year assessment

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

## SHLAA Sites 0-5 Year Delivery

Viability Results		Zone 1		0-5 Year Delivery	
Ref	Site	Size	Units	Type	Viability
4	Southern Counties, West Green	0.63	150	Brownfield	£188,238
38	Former Thomas Bennett School, <u>Tilgate</u>	2.40	100	Greenfield	£461,429
286	North East Sector Neighbourhood, Pound Hill	46.30	1900	Greenfield	£863,506
197	Fairfield House, West Green Drive, West Green	0.65	93	Brownfield	£137,115
57	Brunel Place, West of Southgate Avenue, Southgate	0.14	15	Brownfield	£27,700
177	Crossways, <u>Balcombe</u> Road, Pound Hill	0.26	7	Brownfield	£88,726
191	Oak Tree Filling Station, 114 London Road, Northgate	0.18	17	Brownfield	£9,734
216	Former TSB Site, Russell Way, Three Bridges	0.30	40	Brownfield	£65,674
254	Langley Green Youth Centre, Lark Rise, Langley Green	0.17	9	Brownfield	£114,077
264	6 - 10 <u>Ifield</u> Road, West Green	0.09	14	Brownfield	£15,025
263	1 - 3 Denne Road, Southgate	0.09	8	Brownfield	£101,401
211	8 <u>Goffs</u> Park Road, Southgate	0.09	6	Brownfield	£76,233
214	70 <u>Spencers</u> Road, West Green	0.13	13	Brownfield	£27,735
25	5 - 7 Brighton Road, Southgate	0.44	48	Brownfield	£48,435
166	Alpine Works, Oak Road, Southgate	0.13	6	Brownfield	£77,237
326	Crawley Community Church, 40 Springfield, Southgate	0.06	8	Brownfield	£101,401
328	Former Oak, Maple & Beech House, Waterside Close, <u>Bewbush</u>	0.30	14	Brownfield	£15,025
43	<u>Ifield</u> Community College, <u>Ifield</u>	3.90	125	Brownfield	£209,046
294	15 - 29 Broadway, Northgate	0.12	57	Brownfield	£104,792
295	Land Adj to Langley Green Primary School, Langley Drive, Langley Green	0.55	30	Greenfield	£183,971
292	Zurich House, East Park, Southgate	0.30	59	Brownfield	£97,149
298	<u>Goffs</u> Park Depot, Old Horsham Road, Southgate	0.90	30	Brownfield	£26,968
45	Tinsley Lane Playing Fields, Three Bridges	6.00	138	Greenfield	£235,722
69	Telford Place/Southgate Drive, Southgate	0.75	95	Brownfield	£159,849
312	<u>Kilnmead</u> Car Park, Northgate	0.52	30	Brownfield	£52,831
53	Traders Market, High Street, West Green	0.04	6	Brownfield	£26,849

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

### SHLAA Sites 6-10 Year Delivery

Viability Results		Zone 1		6-10 Year Delivery	
Ref	Site	Size	Units	Type	Viability
204	21, 25, 27 & 29 <u>Tushmore Lane, Northgate</u>	0.60	63	Brownfield	£605,222
52	North East Sector Residual Land (North), Pound Hill	5.44	100	Greenfield	£858,368
291	Longley Building, East Park, Southgate	0.27	48	Brownfield	£538,504
296	Land Adj to Horsham Road & South of <u>Silchester Drive, Gossops Green</u>	1.32	52	Greenfield	£1,141,922
288	102-112 London Road & 2-4 <u>Tushmore Lane, Northgate</u>	0.39	44	Brownfield	£425,785
289	116-136 London Road, Northgate	0.56	64	Brownfield	£597,918
290	138-144 London Road, Northgate	0.27	27	Brownfield	£320,173
TBC	<u>Breezehurst Drive Playing Fields, Bewbush</u>	4.80	100	Greenfield	£1,212,077
TBC	Land at <u>Bewbush West, Bewbush</u>	0.60	48	Greenfield	£1,054,082
155	Dingle Close/ <u>Ifield Road, Rear Gardens, West Green</u>	0.70	18	Greenfield	£404,896
156	Snell Hatch/ <u>Ifield Road, Rear Gardens, West Green</u>	0.50	15	Greenfield	£337,413
195	2-12 <u>Eriston Walk, Ifield</u>	0.53	21	Greenfield	£466,769
0	Crawley Station	0.89	300	Brownfield	£3,359,129
0	County Buildings	0.58	50	Brownfield	£578,813
0	Land North of the Boulevard	0.70	50	Brownfield	£566,223

### SHLAA Sites 11-15 Year Delivery

Viability Results		Zone 1		11-15 Year Delivery	
Ref	Site	Size	Units	Type	Viability
54	Fire Station, <u>Ifield Road, West Green</u>	0.35	32	Brownfield	£613,006
58	Central Sussex College Site, Three Bridges	0.60	32	Brownfield	£613,006
63	Ambulance Station, <u>Ifield Avenue, West Green</u>	0.40	16	Brownfield	£384,375
297	Station Way Car Park, West of <u>Overline House, Northgate</u>	0.23	33	Brownfield	£629,411
311	Parkside Car Park, Northgate	0.05	10	Brownfield	£166,943
310	Land Adj to St John's Church, Church Walk, Northgate	0.15	20	Brownfield	£400,098
52	NES Residual Land (North), Pound Hill	5.44	75	Greenfield	£939,403
TBC	NES Residual Land to the Southeast Heathy Farm, Pound Hill	4.30	75	Greenfield	£1,236,124
TBC	Land South of Barclays Bank, High Street, West Green	0.30	18	Brownfield	£383,911
TBC	94-98 High Street & <u>Brittingham House</u>	0.23	36	Brownfield	£711,822

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

**APPENDIX D: FORGE WOOD DELIVERY TRAJECTORY**

Forge Wood: Local Plan Housing Trajectory - February 2015							
Year	Private	Social Rented (70%)	S/O (30%)	Total	Phase		
2015/2016	83	28	22	133	Phase 1		
2016/2017	120	56	24	200	Phase 1		
2017/2018	120	56	24	200	Phase 1/2		
2018/2019	120	56	24	200	Phase 2		
2019/2020	120	56	24	200	Phase 2/3		
2020/2021	105	49	21	175	Phase 3		
2021/2022	105	49	21	175	Phase 3		
2022/2023	105	49	21	175	Phase 3/4		
2023/2024	105	49	21	175	Phase 4		
2024/2025	105	49	21	175	Phase 4		
2025/2026	52	27	5	84	Phase 4		
2026/2027	0	8	0	8	Phase 4		
<b>12 year build</b>	<b>1140</b>	<b>532</b>	<b>228</b>	<b>1900</b>			
subject to planning & market conditons reviewed quarterly							

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

## **APPENDIX E: TINSLEY LANE OPEN SPACE SUMMARY**

- A new pavilion/social club and high quality senior pitch as well as a 3G junior pitch is considered an enhancement on the existing configuration of pavilion/social club and three grass football pitches. This specifically addresses the issues highlighted in the Playing Pitch Study<sup>1</sup> namely the need for 3G pitches and junior size pitches.
- A junior 3G pitch would allow a significant increase in number of junior matches and training on the site. This is in line with the recent report by the FA<sup>2</sup> which cites poor quality pitches and facilities as a key issue and the need/demand for 3G pitches. A grass pitch can take 4/5 hours a week (lower in Crawley due to naturally poor drainage) whereas a properly maintained 3G pitch can deliver 70—80 hours per week.
- The proposals would allow the management and opening up of Summersvere Woods for informal recreation. This is a 4.75ha area on the eastern boundary of the allocation and is owned by the HCA.
- Notwithstanding the additional 4.75ha of publicly accessible natural green space, there would be an overall increase in publicly accessible play space, allotments and amenity green space on-site. This provision is important to the local housing area which is lacking in these types and is somewhat isolated with the railway line to the east, manor royal business district to the west and a dual carriageway to the south.

---

<sup>1</sup> Page 84 and 88, LP116 A Playing Pitch Study for Crawley 2013, Leisure and the Environment.

<sup>2</sup> <http://www.thefa.com/news/2014/oct/fa-chairman-england-commission-pt2>

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

## **APPENDIX F: CORRESPONDENCE BETWEEN OAKWOOD FOOTBALL CLUB AND HOMES AND COMMUNITIES AGENCY (HCA)**

# **OAKWOOD SPORTS & SOCIAL CLUB**

H.Q. Ground; Oakwood Sports & Social Club. Tinsley Lane, Crawley, West Sussex

Correspondence to: The Chairman, Stuart Lovegrove, 37 Tinsley Lane, Crawley, West Sussex, RH10 8AJ

Simon Snook MRICS  
Area Manager- Sussex  
Homes & Communities Agency  
Bridge House  
1Walnut Tree Close  
Guildford  
GU14GA

23rd February 2015

Dear Simon

It was good to catch up with yourself and Kate today and it was a useful update. I am fully supportive of the residential allocation of the Tinsley Lane site and it fully meets Oakwood football clubs current and future requirements.

The proposed new facility will be a great improvement for the club. It envisaged that there will be a full size football pitch which will be properly drained. Currently we have a real problem with the pitch being water logged and regularly have to find alternative locations to train which comes at a cost to the club. A junior 3G pitch/ astroturf will be particularly beneficial as it would allow a significant increase in the number of junior matches and training on site. A grass pitch can take 4/5 hours a week (albeit lower in Crawley as there is poor drainage) whereas a properly maintained 3G pitch can deliver 70/80 hours a week. Currently, the club has to incur additional fees for some of the teams to train elsewhere as the club does not currently have adequate facilities.

The club house is in need of refurbishment and the provision of a new facility will provide an opportunity to generate much needed additional revenue to support the operation of Oakwood FC. Finally, a new club house would be the hub to the football club and provide a local meeting place.

As you know I have been a local resident in the Tinsley Lane area and the Oakwood football club is very much part of the community. The club house and facilities when not being used by the club itself would be available to hire out and use by the local surrounding community. It could also be available at lunchtimes for local employees to use.



*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

Should you require any further information in the meantime please do not hesitate to come back to me.

A stylized signature consisting of a lowercase 'y' followed by a '7'.

Stuart Lovegrove  
Chairman - Oakwood Football Club

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

## **APPENDIX G: BREEZEHURST DRIVE OPEN SPACE COUNCIL RESPONSE TO REPRESENTATIONS**

### CBC Response to Sport England Concerns:

#### Playing Pitch Study is not robust as it does not follow Sport England's current guidance:

The Planning Practice Guidance states that "*Authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities*"<sup>3</sup>. This does not specify that following the most recent Sport England guidance is required to produce a robust assessment. Our view is that Paragraph 73 of the NPPF sets out what is required and it is up to the Local Authority to determine what information is needed to be able to '*identify specific needs and quantitative or qualitative deficits or surpluses of open space...*' and to '*...determine what open space, sports and recreational provision is required*'<sup>4</sup>.

Whilst the published playing pitch study does not follow Sport England's 9-12 month process as set out in the new Sport England guidance, the council believes it does meet the NPPF requirements:

Crawley's Playing Pitch Study<sup>5</sup> was undertaken in Feb-May 2013. The draft brief for the study specified that it should comply with paragraph 73 of the NPPF and reflect current good practice and any relevant guidance. The guidance available at this time was Sport England's 'Towards a Level Playing Field' which had been the accepted methodology since 2003. The brief was sent to Sport England who responded saying that the approach was "fairly sound" and advocated a move away from standards towards a more "what do we need and when" approach as more effective.

The consultants took this on board and whilst still using standards, included a more collaborative approach placing importance on meetings with council staff and telephone interviews with sports governing bodies, league secretaries and individual clubs<sup>6</sup>. The action points for each sport and by each neighbourhood are a reflection of the collective results and discussions of this qualitative research.

As well as this, a quantity and quality audit of pitches and teams and an assessment of temporal pattern of demand for pitches was undertaken. This was informed by practical considerations such as quality of pitches and their ability to absorb wear and tear. An assessment of the likely future demand over the plan period based on the scale and location of planned housing and the resultant population growth was calculated including 10% margin of error<sup>7</sup>.

---

<sup>3</sup> Planning Practice Guidance, Open space, sports and recreation facilities, public rights of way and local green space, Para 002 ID 37-002-20140306.

<sup>4</sup> NPPF para 73, 2012

<sup>5</sup> LP116. A Playing Pitch Study for Crawley (2013), Leisure and the Environment

<sup>6</sup> LP116. A Playing Pitch Study for Crawley, sections 3.12 & 4.11, (2013) Leisure and the Environment

<sup>7</sup> LP116. A Playing Pitch Study for Crawley, page 58, (2013) Leisure and the Environment

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

Both the quantitative and qualitative research pointed towards the need to improve playing surfaces, drainage and other ancillary facilities; re-marking of pitches, additional artificial surfaces, and making better use of educational facilities. The playing pitch study action points alongside the Open Space Study recommendations determine what open space, sports and recreation provision are required and where.

The use of standards is not now advocated by Sport England as 'it does not take account of local demands for sport or site specific opportunities'. Whilst standards are used the evidence base has also taken into account of local demands for sport and site specific opportunities<sup>8</sup>.

**The Parks and Recreation deficit in the table on Topic Paper 3 page 41 does not relate to the Playing Pitch Study:**

This is explained on page 78 of the Playing Pitch Study. The quantity standard for grass pitches is included within the parks and recreation standard set out in the Open Space Study. There is however, a quantity standard just for sports pitches which was not included in this table. There would be a deficit of 0.01ha of sports pitches by 2030 taking into account planned development and a 10% margin for error. This shows purely on a quantitative basis that the deficit of parks and recreation open space is for informal recreation not organised pitch sports. The detailed assessment within the Housing Supply Topic Paper highlights that there is a significant amount of amenity green space and natural green space that can also serve this purpose. This, alongside overall enhancements to open space and new provision justify the allocation; there will be a sufficient amount of open space, the quality will be higher and the mix of types of open space will be more appropriate.

**Amenity Green Space and Natural Green Space are not suitable for provision of sports pitches:**

It is not proposed that amenity green space and natural green space can replace the sports pitch function (see response above). The overlap is highlighted in relation to parks and recreational space having similar functions to amenity green space and natural green space<sup>9</sup>. For example, functioning as informal recreation. The assessment in Topic Paper 3<sup>10</sup> sets out how the loss of a sports pitch can be compensated.

**Marking Skelmersdale/improving drainage is not a replacement playing field:**

It is important to note that a playing field is not being lost. Part of a playing field marked out as a sports pitch would be lost. The remaining space approx. (4.5ha) will be made more usable and popular for residents and sports clubs by improving them. The Skelmersdale Walk end of the playing fields has not been used for formal sports for a number of years due a combination of lack of quality (drainage) and a lack of demand. The drainage in this area should be improved so that it can be used to absorb any future demand for pitches<sup>11</sup>.

<sup>8</sup>LP115 Crawley Open Space, Sport and Recreation Study page 67-108, 2013, JPC Strategic Planning & Leisure, Leisure and the Environment; and LP116. A Playing Pitch Study for Crawley, pages 84-88, 2013, Leisure and the Environment; and LP012 Topic Paper 3 Housing Land Supply, page 44/45, 55-59 November 2014, Crawley Borough Council; and LP005 Infrastructure Plan, Page 24, November 2014.

<sup>9</sup> LP012 Topic Paper 3 Housing Land Supply, page 41/42, November 2014, Crawley Borough Council

<sup>10</sup> LP012 Topic Paper 3 Housing Land Supply, page 44, November 2014, Crawley Borough Council

<sup>11</sup> LP012 Topic Paper 3 Housing Land Supply, page 41/44, November 2014, Crawley Borough Council

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

There is a lack of evidence to say there is no interest from clubs to use this site.

The council own the site and it is available to lease. Since Crawley Town FC stopped using the site a couple of years ago the council has had no interest from clubs to use it. However, as the assessment of this site acknowledges<sup>12</sup>, this does not mean all the playing fields are redundant as latent demand may pick up. Therefore, the remaining playing fields should be retained and improved to leave headroom for future fluctuations in demand. There is ample provision elsewhere in Bewbush and across the town to meet need. The council is still in a position where pitch provision can be increased if needed but unfortunately, grass pitch football in Crawley has seen a noticeable decline in the last decade<sup>13</sup>.

#### CBC Response to other concerns raised:

Open space study states that 1.6ha of parks and rec per 1000 people is a minimum (para 9.7 page 15). Crawley Borough Council has a minimum standard for park and recreation grounds. A minimum is a minimum, regardless of any other issues:

The standards proposed in the open space study are for “minimum guidance levels of provision” (page 43). The standards are applied on a neighbourhood basis as it is the least arbitrary way of applying the quantity standards to an area. However, whether surplus or deficit is identified does not mean that open space should be developed or protected based on the quantity standard alone. It is a useful tool to provide an indication of whether there is a sufficient amount of each type of open space in an area. It also is important to look at a site and its context in detail beyond the arbitrary boundary used to define quantity standards, as well as accessibility and quality of nearby sites and qualitative information from surveys and interviews. This approach that council have undertaken ensures that limitations of just using quantitative data are overcome.

Current park and rec space is approx. 14.95ha (NOT the 16.25ha quoted in the Open Space Study). (This figure of 14.95ha needs clarifying as it does not match figures I obtained with a trundle wheel, but is close 0.3ha less in total):

The 16.25ha quoted in the open space study is the amount of open space at the time of the sports pitch audit (March 2013). Since then development of the of the old leisure centre site (as allocated in the Core Strategy) has commenced. This reduction in open space and the impacts of the population increase over the plan period are reflected in Housing Supply Topic Paper 3 Assessment of Breezehurst Drive (page 41 para 3 and table).

The building of more homes on playing fields will take Bewbush below the MINIMUM space standard for park and rec. grounds. This is also contrary to Policy OS2 (p.110 of Open Space Study) and ENV4 (p.90 submission Local Plan consultation draft):

---

<sup>12</sup> LP012 Topic Paper 3 Housing Land Supply, page 44, November 2014, Crawley Borough Council

<sup>13</sup> A Playing Pitch Study for Crawley, page, 42 last bullet, 2013, Leisure and the Environment.

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

Policy OS2 is a recommendation within an evidence base document. It is not council or planning policy. However, the general thrust of the policy is supported and it is not felt that development of the Breezehurst Drive site would lead to an overall deficiency<sup>14</sup>.

CBC say all open spaces serve similar functions. However, the figure for natural green space includes, for example, the surface area of the Mill Pond, which is unsuitable for sport:

The Breezehurst Drive Assessment does not say that all open spaces serve similar functions. There are overlapping functions between parks and recreation grounds, natural green space and amenity green space. The Millpond is included as it would be if it were part of a parks and recreation ground. It can be used for informal recreation such as fishing and also adds to the visual amenity of the area.

C.B.C. have also stated that Buchan Park (owned by West Sussex C.C.) and the, as yet, not provided park at Kilnwood Vale (owned by Horsham D.C.) will be available to Bewbush residents. It is unacceptable for C.B.C. to build upon its own parks and expect other authorities to provide open spaces:

It would be inconsistent not to consider the existing Buchan Country Park that is adjacent to the site when many residents of Bewbush, and Crawley as a whole, visit the park regularly. The park within the Kilnwood Vale masterplan is adjacent to Bewbush and will inevitably be used by Bewbush residents as it will be closer to many residents than parks within Crawley's borough boundary.

Have seen people using the park at Breezehurst Drive. However, facilities at the park have been reduced; play equipment was moved to a new site, goals have been removed and pitches are no longer marked out. This could reduce the attractiveness of the park:

Overall there has been an enhancement to open space in the immediate area as part of the council's regeneration programme for central Bewbush. These improvements included changing rooms, a community meeting facility and drainage works to enhance and increase the use of the sports pitches to the south of the site. A pocket park, 2 MUGAs and a parkour area were also created immediately to the north of Breezehurst Drive. These improvements created open space facilities of higher quality, in a good location and better suited to the needs of the Bewbush community as set out in the Central Bewbush Supplementary Planning Document.

CBC claim that some of the surface Breezehurst Drive is low quality, but it didn't stop Crawley Town F.C from using it as their Training Ground. They even won promotion from League 2 whilst there, so I'm not sure how bad it is:

The playing pitch study classes the pitch immediately to the south of the community facility as excellent quality. This is the pitch that was used by Crawley FC. The pitch to the east abutting housing is of poor quality as is the large playing field south of Skelmersdale Walk<sup>15</sup>.

---

<sup>14</sup> LP012 Topic Paper 3 Housing Land Supply, pages 40-45, November 2014, Crawley Borough Council

<sup>15</sup> LP116. A Playing Pitch Study for Crawley, page 95-97 (2013), Leisure and the Environment Ltd

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

It is recommended in Topic Paper 3 that the excellent quality pitch is retained along with the community facility and enhancements are made to Skelmersdale Walk playing fields to meet sports pitch and open space needs.<sup>16</sup>

#### Have C.B.C. considered alternative sites?

Pages 38/39 of Housing Supply Topic Paper 3 sets out the councils approach to open space. The open space study<sup>17</sup> neighbourhood sections highlighted where there may be opportunities to rationalise provision of open space and in turn deliver new types of open space and improve quality to meet the needs of residents over the plan period. These areas were looked at in further detail and recommendations published in Housing Supply Topic Paper 3 Appendix B.

*It is impossible to predict accurately what will happen to the size of the population over the next sixteen years:*

The implication of population growth has been calculated by taking the number of proposed dwellings and multiplying that by the average household size taken from the 2011 census (2.49 people per household)<sup>18</sup>. Population growth and possible fluctuations in demand for sports pitches is also taken into account<sup>19</sup>.

The impacts of this is set out in set out in Housing Supply, Topic Paper 3 and considered part of the site assessments<sup>20</sup>.

---

<sup>16</sup> LP115 Crawley Open Space, Sport and Recreation Study, page 44/45, (2013) JPC Strategic Planning & Leisure, Leisure and the Environment Ltd

<sup>17</sup> LP115 Crawley Open Space, Sport and Recreation Study, (2013) JPC Strategic Planning & Leisure, Leisure and the Environment Ltd

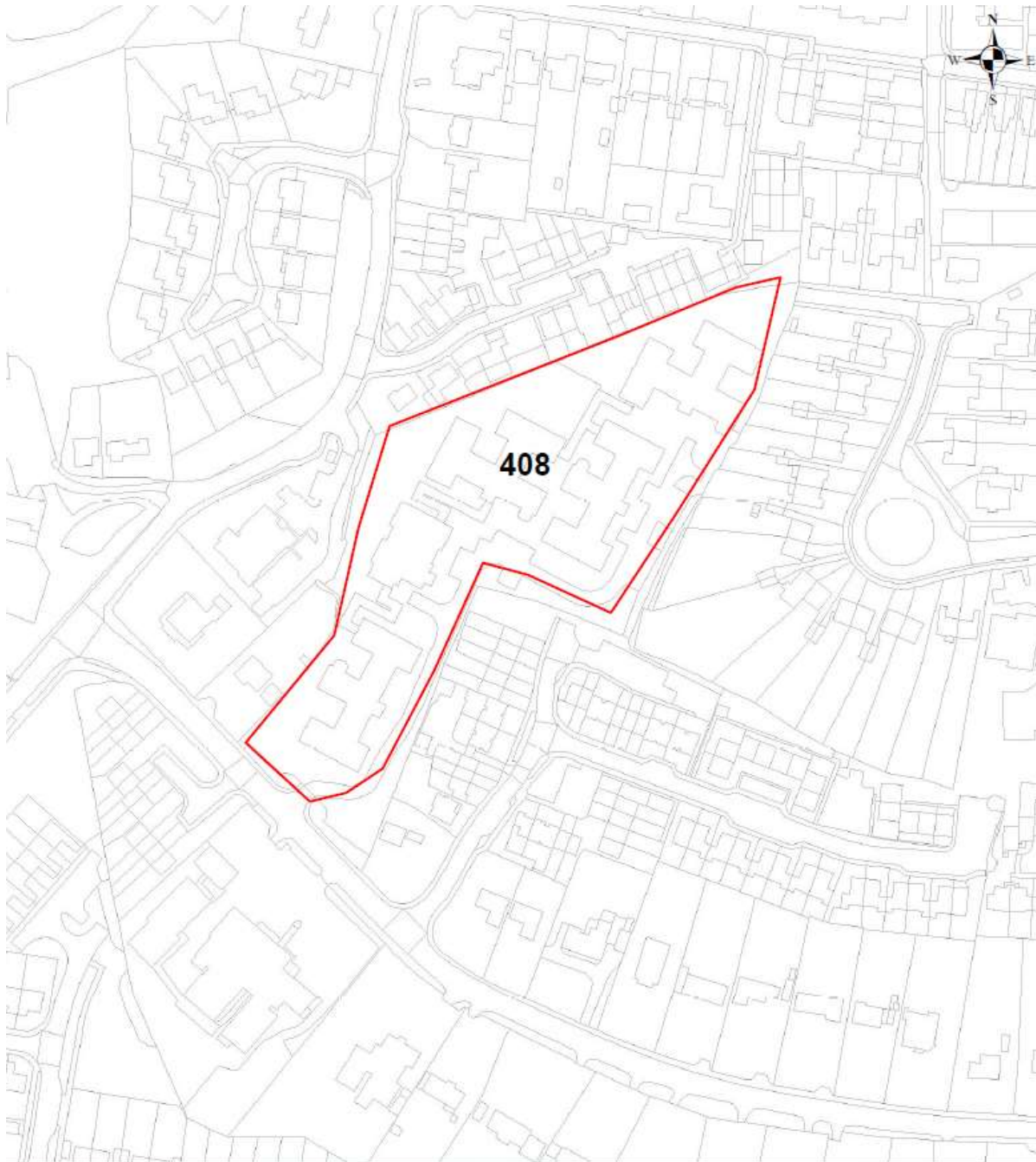
<sup>18</sup> LP115 Crawley Open Space, Sport and Recreation Study, pages 14/15, (2013) JPC Strategic Planning & Leisure, Leisure and the Environment Ltd

<sup>19</sup> LP116. A Playing Pitch Study for Crawley, page 58, (2013) Leisure and the Environment Ltd

<sup>20</sup> LP012 Topic Paper 3 Housing Land Supply, Appendix B, (November 2014), Crawley Borough Council

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

**APPENDIX H: SHLAA Extract for Oakhurst Grange (Category I, sites that are suitable but undeliverable)**



Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

<b>Site Reference</b>	408	<b>Neighbourhood</b>	Southgate
<b>Site Name / Address</b>	Oakhurst Grange Nursing Home, <u>Goffs</u> Park Road		
<b>Existing Land Use (s)</b>	Nursing Home-PDL		
<b>Site Area (Gross hectares)</b>	-	<b>Current Density</b>	-
<b>Site Suitability</b>	<b>Yes</b> –This is a brownfield site located in a desirable and sustainable location. The site was previously used as a care home and lies within a predominantly residential location and so the principle of residential development is considered acceptable.		
<b>Site Availability</b>	<b>No</b> – The care home is no longer in active use. However, the site is not considered available as there is an evident need for the provision of a care home in Crawley and so the council would prioritise this type of use over residential development, unless a replacement facility was to be provided.		
<b>Site Achievability</b>	<b>No</b> – The site is being promoted by the council for the use of a care home and would be contrary to Policy IN1 of the Local Plan if a residential development was accepted without a replacement facility.		
<b>Action Required / Constraints</b>	A replacement facility of a care home would need to be provided if this site was to be developed for housing. This would justify the loss of the previous use as a care home.		
<b><u>Deliverability/ Developability</u></b>	Not currently developable		
<b>Summary</b>	The site is considered suitable for residential development. However in accordance with Policy IN1 of the Local Plan, a replacement facility of a care home would need to be provided elsewhere in the borough for the site to be delivered.		



*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

**APPENDIX I: THE WORTH CONSERVATION AREA STATEMENT**

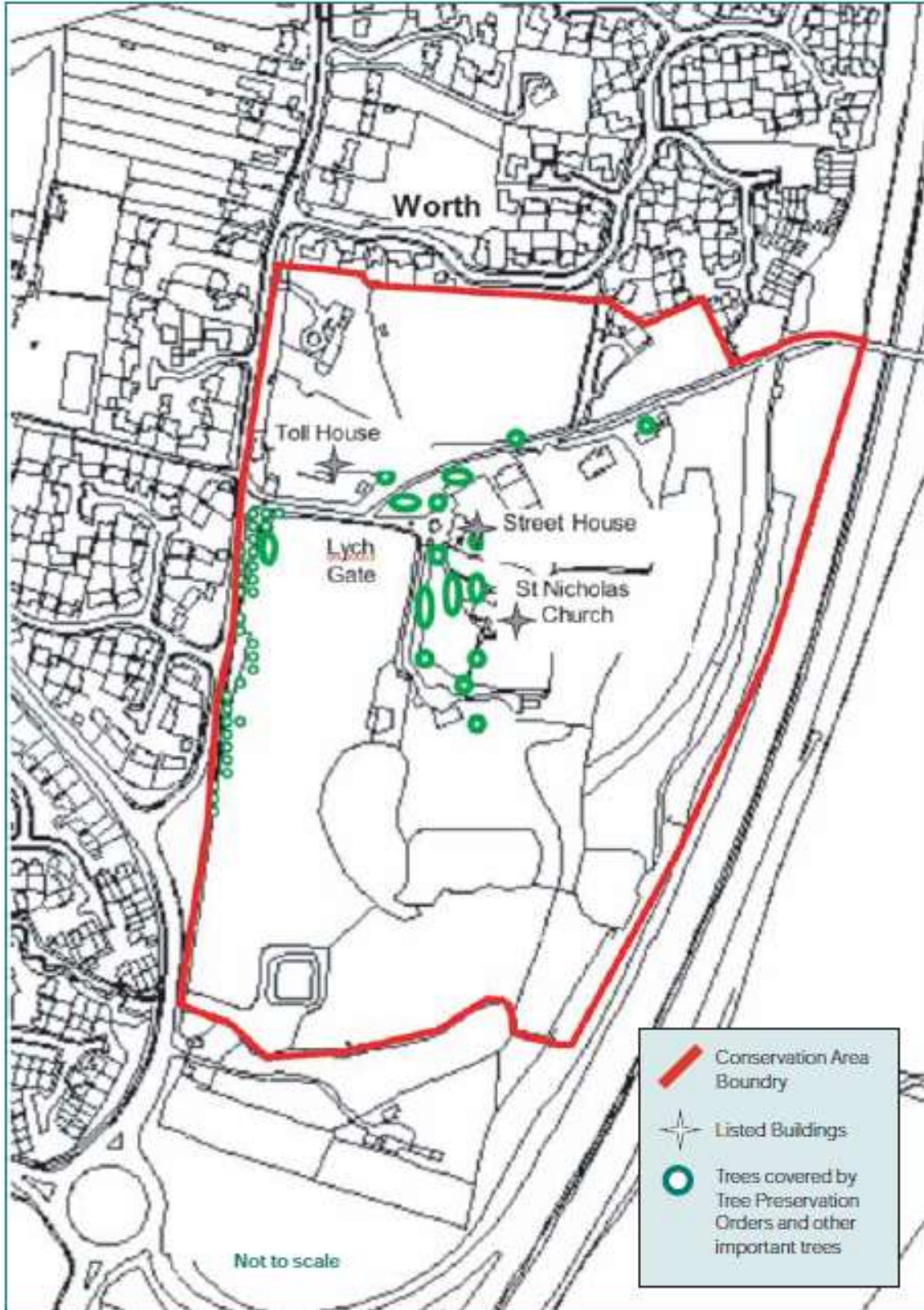
# Worth Conservation Area Statement

## August 2003



Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

## Conservation Area Map 1



Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

## Introduction

2

Section 91 of the Planning (Listed Buildings and Conservation Area) Act 1990, defines Conservation Areas as:

*"areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance."*

A number of factors may contribute to an area being designated as a Conservation Area including features such as listed buildings, historic street patterns and open spaces.

Worth Conservation Area is situated just within the south eastern boundary of Crawley. Its boundary runs along the northern boundaries of Fieldgate and Beaufort Cottage, down the motorway, across to Balcombe Road, just south of the moat and northwards up Balcombe Road, Street Hill. It was designated by the Borough Council in March 1987 when it was recognised that it was important to preserve and enhance the character of the setting of St. Nicholas' Church, which has been described as one of the most perfect specimen of a Saxon building in England.



This statement sets out the Council's proposals for the preservation and enhancement of the Worth Conservation Area. It is the second Conservation statement. It updates the previous statement approved in June 1990 and takes into account changes made in the approved Local Plan and other changes that have occurred within the area. The Area designated as a Conservation Area is shown on Map 1 and the official schedule in Appendix 1.



Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.



The church



## A Brief History of the Conservation Area

Worth Church is a Church believed to be of Saxon origins. It was originally established to serve an extensive afforested area of the High Weald in which there were many scattered and often temporary settlements. It was positioned at a convenient meeting point of tracks through the forest and existed for many hundreds of years in almost total rural isolation, only a few other buildings being built nearby until recent years. Even with the growth of Crawley and the construction of the M23 in recent decades, the largely rural situation of Worth Church has remained, and it is this, which gives rise to the designation of the area as a Conservation Area. A more detailed history is given at Appendix 2.

### Existing Buildings

*The Victorian History of Sussex describes St. Nicholas' Church as remarkable example of a pre- Conquest building of a cruciform plan, dating practically from one period. Of course, there have been alterations made, including a new roof in 1986. It is a Grade I Listed Building.*

During the nineteenth century, the church apse had six buttresses but these were removed when the church was restored in 1871. Before the restoration, the walls were thickly plastered inside and out. The tower dates from this time and the south timber porch is also modern (1886).

The church is notable in that it is very different from other Sussex Churches. It is more substantially built and more finely finished than most, which suggests that the masons may have come from further north.

The chancel is very long in proportion to the nave rendering the church a rare shape. It has a half-round apsidal end with 3 modern, single lights of 12th century character. The chancel arch is the tallest Saxon arch of its kind in Britain.

The Worth and Three Bridges Sussex Official Guide describes the massive stone arches from the nave to the transepts and the chancel arch as "probably the earliest and finest stone arches in existence today." They still show signs of original Saxon tool-marks. The pilasters are also said to be exceptional. These are vertical stone strips, connecting the string course with the plinth and are seen only in pre-Conquest construction.

As with most ancient churches, there is a 'devils door' in the north wall which, although blocked up, can still be seen from the inside. Evil spirits were "driven out" through this door which was left open during baptisms.

Outside the church there is a narrow avenue of lime trees known as the twelve apostles, leading to a timber lychgate which is a Grade II listed structure in its own right. The lychgate dates from the 16th/17th century and was restored in 1956.

Many of the interior features of the Church are of great historical interest. The pulpit, dated 1577, said to have come from the cathedral of Worth, Bavaria, was found in a London curiosity shop. The font dates from the late 12th century although its history is unknown. At the western end of the nave is a gallery in which there is an inscription:

"This gallerie is the gift of Anthony Lynton, late rector of this Parish who deceased XV day of IVNE ANNO DOMINI 1610"

The interior of the Church is essentially undecorated although there is some medieval painting on the rear-arch of the small 14th century window, east of the south transept archway. The painting is a design of red flowers and foliage.

3

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

#### 4 Other Listed Buildings

In addition to St. Nicholas Church and the lychgate, there are two other Listed Buildings within the Worth Conservation Area, namely Street House and Toll House which are both listed Grade II.



##### ***Street House***

Street House was built in the 1700's and was originally an Inn. It is a timber-framed building with red-brick infilling. The exterior has been refaced and weather-boarded. The roof is of Horsham slab, a common local roofing material.

##### ***Toll House***

Toll House was an early nineteenth century Toll house on one of the London to Brighton routes. It has been altered in recent times. One of the most notable features is the crest of an animal's head on the gable end of the south wing.



##### ***Non-Listed Buildings***

There are several unlisted buildings within the Conservation Area, which although, not of significant historical or architectural interest, add to the Area's character. These buildings comprise the Rectory, the Bishops Lodge Fieldgate, Beaumont Cottage, Bushend and several other dwellings along the Worth Way.



*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

## Objectives of the Conservation Area

The aim of the Conservation Area is to seek to preserve and enhance the rural character and appearance of the open setting of St Nicholas Church within the Worth Conservation Area.

The area includes several open fields, some designated as a Site of Nature Conservation Importance and large houses which surround the church. It also has good tree cover and a large number of the trees are covered by TPOs. The Worth Way footpath and Crawley's Greenway also pass through the area.

The general improvements that will be sought within the Conservation Area include:

- opportunities for improving local parking facilities and other visitor facilities
- the repair and improvement of road surfaces and footways with appropriate materials
- the repair of boundary walls, fences, hedges and verges and
- additional informal planting

## Control, Policies and Proposals

This section of the statement provides guidance on the implications of Conservation Area designation and the Borough Council's policy on the Worth Conservation Area. It seeks to give advice to householders/owners and other interested parties in order to ensure any further proposals for existing or new buildings are consistent with the overall objectives of the Conservation Area. It is recommended that residents should always seek advice from planning officers.

Conservation Area designation does not prohibit all future development.

However, there are a number of planning implications which result from designation.

Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in exercising planning functions special attention should be paid to the desirability of preserving and enhancing the character or appearance of the Conservation Area. Conservation Area designation also affects the permitted development rights of householders.

In addition policies of the Crawley Borough Local Plan 2000 are

relevant to the Conservation Area.

### Local Plan Policies

Local Plan policy for conservation areas is currently outlined in the adopted Crawley Borough Plan 2000. (The policies BN 2- 6 are reproduced in full in Appendix 4).

The acceptability of a proposal in a conservation area often depends upon the details of its siting, design, appearance, access and landscaping. It is also important that the potential effect of development adjacent to a conservation area is

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

6 assessed as it can also affect the character of the area.

Policy BN 9 specifically relates to the Worth Conservation Area. This policy seeks to preserve and enhance the rural character and appearance of the open setting of St Nicholas Church within the Worth Conservation Area.

The Conservation Area lies outside the built up area and therefore is defined as countryside. The purpose of the countryside designation is to retain the generally open character of the area which is an important natural resource and provides the setting for the urban area. There are a number of countryside policies which therefore apply to the Conservation Area and as a result there is a strong presumption against development unless it is related to the needs of agriculture or forestry.

Policy C8 is concerned with proposals for the extension of existing residential buildings outside the built up area. Other policies include Policy C7 on proposals for the change of use or conversion of existing agricultural dwellings and C9 on the replacement of residential

dwellings.

### Guidance for Existing Buildings

The 1988 Town and Country Planning General Development Order provides for permitted development. This means that planning permission is not required for certain forms of development such as small house extensions.

However, in a conservation area permitted development rights are more restrictive and planning permission is required for certain types of development which elsewhere are classified as permitted development. These include cladding, dormer windows in roof slopes, erection of satellite dishes, installation of radio masts, and extensions exceeding 50 cubic metres or 10 percent of cubic capacity.

These controls are necessary to ensure that any changes respect the character and appearance of the Conservation Area. Even if planning permission is not required, the Borough Council will expect that development is carried out with

sensitivity and respect for the setting.

A summary of the Borough Councils policy on proposals for existing buildings in the Conservation Area are as follows :

- many of the non listed buildings are recognised as being important to the Conservation Area.
- the demolition of most of the buildings in the Conservation Area would be resisted.
- proposals for extensions to non-listed buildings in the Conservation Area will be considered in the context of their overall effect on the Conservation Area.
- the present use of the building should be maintained.

### Guidance for Listed Buildings

There is additional legislation which applies to Listed Buildings. Listed Building Consent is required for all alterations and extensions which materially affect the character of the building (internal or external). Control also includes objects and structures within the curtilage of Listed Buildings.

The Listed Buildings in the Conservation Area are not only

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*



important as individual buildings as they also make a particularly important contribution to the area as a whole. Stricter controls therefore apply to changes to Listed Buildings to ensure that their character and appearance is maintained.

The following summarises the Borough Council's policies relating to Listed Buildings in the Conservation Area :

- applications for extensions to Listed Buildings will be considered on their merits of the proposal and taking into account the likely effects on the character and appearance of the Conservation Area.
- the retention of all Listed Buildings within the Conservation Area is important to its character and appearance and the loss of any buildings will be resisted.
- present uses for all Listed Buildings are encouraged to be maintained but new uses would be permitted where this would ensure the buildings retention.

### Guidance for New Buildings

Proposals for new buildings in the Conservation Area will be considered against the policies in the adopted Crawley Borough Local Plan 2000.

It is important that any new buildings are in a style which is in keeping with

the character and appearance of the Conservation Area.

- Proposals for new buildings within the Conservation will normally be resisted.
- Proposals for extensions to existing buildings or new outbuildings may be acceptable providing that they respect the character of the area by having regard to the building styles, typical features and materials used in the Conservation Area.

### Advertisements

Guidelines for the control of advertisements are in the Town and Country Planning (Control of Advertisement Regulations)1992.

Where it is expedient in the interests of amenity or public safety a local authority can designate "Areas of Special Advertisement Control." Areas are normally sensitive locations such as conservation areas and Worth Conservation Area has therefore been designated as an Area of Special Advertisement Control.

In such areas many advertisements and signs which would normally benefit from deemed consent, require express consent. In addition local planning authorities can set special design objectives for

advertisements and signs and exercise especially stringent control.

The following summarises the Policy of the Borough Council towards advertisements in the Conservation area.

- Advertisements should respect the character of the Conservation Area and should be of a small scale in a traditional style.

### Policies on Trees

Trees make a valuable contribution to the character of the Worth Conservation Area. It is therefore important that wherever possible trees are retained. There are two areas of control over work relating to trees in the Conservation Area. All trees in Conservation Areas are subject to control under the (Listed Buildings and Conservation Areas) Act 1990. In addition a large number of the trees within the Worth Conservation Area are covered by Tree Preservation Orders to which separate controls apply. The map and schedule contained in Appendix 3(a) outline the trees that are covered by Tree Preservation Orders and the map and schedule contained in Appendix 3(b) indicate those that are not, but are considered important to



*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

**8** the character of the Conservation Area.

The summary of the policies relating to trees has been divided into those relating to all trees in the Conservation Area and those relating to trees covered by TPOs.

- The Borough Council must be given 6 weeks notice of the intention to carry out work on any tree (other than a fruit tree) in a Conservation Area.
- It is an offence to cut down, uproot, top, or lop a tree in a Conservation Area without prior notification to the Local Planning

Authority.

- An owner can be required to replace a tree or a group of trees.
- Where trees are threatened with works which would be harmful to the character and appearance of the surrounding environment, the Borough Council will consider serving TPOs to give them further protection.

Where a tree is covered by a TPO:

- A planning application needs to be submitted to carry out any work including felling, shaping and pruning etc.



## Environmental Improvements

The main purpose of the Worth Conservation Area is to protect and enhance the setting of St Nicholas Church. All proposals for new development must therefore be seen in this context and be consistent with generally protecting the character and appearance of the area.

It is the visitors to the Church that continue to cause the most problems to the area and are threatening to further erode Church Road which will in turn detract from its existing character as a rural lane within the Conservation Area. The Borough Council does not own any land itself

within the Conservation Area and cannot easily undertake improvement works but will encourage and support proposals where possible that will alleviate these problems.

The Borough Council itself may include a small sum of money in the annual budget for minor works which would enhance the Conservation Area. The Development Control Committee in consultation with the Worth Conservation Area Advisory Committee can then decide how to allocate the funds. However it is

likely that top-up funding for joint projects would be favoured.

### Improvements that have been made so far

Since the designation of the Conservation Area in 1987 a number of improvements have been made.

- notice board and bench were erected
- traditional street signs have been provided
- a Conservation Area designation board has been erected

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

- new toilet facilities have been provided for the Church at the Rectory
- improvements have been undertaken to the Worth Way where it runs through the Conservation Area and measures taken so as it now forms part of the National Cycleway Network
- traffic calming and parking bays have been provided in Church Road to alleviate parking problems within the Conservation Area
- the Crawley Greenway has been designated which passes through this area.
- some tree planting as been undertaken
- bench set back and steps provided to make it more accessible

### Further Improvements

There are a number of other improvements that could be carried out that would further enhance the Conservation Area. These will be implemented as resources permit and subject to the co-operation of the relevant land owner.

### The Road

The approach road to the church is of critical importance to the character of the Conservation area, particularly where it fans out in front of Street House and the Church Lychgate. The surface of the road is ordinary tarmac and is breaking up in places. It could be repaired and improved in a manner which is compatible with the rural character of the Conservation area. In particular attention should be given to minimising vehicle damage to verges and corners and to ensuring that the road is treated as a rural lane.

### Parking

Parking continues to be a problem along the road leading to the Church. This is due to the large number of special events that are held at the Church, particularly weddings and christenings, which attract significant numbers of people. This is resulting in an erosion of the bank on the north side of Church Road and the hedgerow on the south side. The Borough Council would consider favourably proposals for a car park for the church providing that it was carefully designed and integrated into the landscape. The success of such a

proposal would almost certainly require the County Council and the co-operation of an appropriate landowner because neither the Borough Council nor the Church own land in the area which could be used for this purpose.

### Street Furniture

The Borough Council has recently improved the public seating within the Conservation Area and made it more accessible. This involved the provision of steps up to the existing bench in Church Road which is a popular vantage point within the Conservation Area. Other improvements of this nature would also be considered where they would enhance the Conservation Area and be of benefit to the general public.

### Landscaping

The motorway detracts from the Conservation Area's semi-rural environment and this could be reduced by further strategic tree planting on the east side of the Church. It would also appropriate to consider planting along the northern boundary of the site to screen the new development that has been carried out.

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.



## Appendix 1

### Schedule for Worth Conservation Area

The northern boundary of the Conservation Area extends from Church Road at the boundary between Fieldgate and Noddy's Farm (grid reference TQ 3006 3641) along the northern boundary of field parcel number 1836, along the northern and eastern boundaries of Beaumont Cottage, then east along the northern edge of the Worth Lodge Farm track, to the M23 motorway embankment (grid reference TQ 3041 3636).

The eastern boundary extends from the point where Worth Lodge Farm track enters the M23 embankment (grid reference TQ 3041 3636) to the point where the culverted Gatwick Stream enters the motorway embankment (grid reference TQ 3025 3593), following the top of the embankment between the two points.

The southern boundary extends from the M23 motorway (grid reference TQ 3025 3593), following the Gatwick Stream to grid reference TQ 3004 3593 and then the southern boundary of the group of trees to the

north-west corner of The Jungle on Balcombe Road (grid reference TQ 3000 3593).

The western boundary extends from grid reference TQ 3000 3593 initially along the eastern side of Balcombe Road and then, after the junction, the eastern side of Street Hill and subsequently Church Road, as far as the boundary between Fieldgate and Noddy's Farm (grid reference TQ 3006 3641).

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

## Appendix 2

### Brief History of the Conservation Area

In Saxon times, the Church was closely surrounded by trees. The Parish of Worth was mainly forest with scattered ironworks. The workings of iron in the area is of great antiquity. The Roman coins of Nero, Vespasian and Tetrius have found in the local cinder beds.

The poet Evelyn describes the surroundings of St. Nicholas' Church in these early times thus:

"All was wild one wild, inhospitable waste uncouth and horrid, desert and untraced; hid by rough thickets from the face of day, the solitary realm of beasts of prey."

The smelting of iron in the forest was important until relatively recent times. It is recorded that cannons were made there as late as 1788.

The parish of Worth, then called Orde, was mentioned in the Domesday Book. It lay within the Hundred of Cherfelle. The settlement was described as comprising "1 villein with half a plough". This probably meant that there was a clearing in the forest with enough land to take one man half a day to

plough. Indeed, the Worth Parish Guide says that Worth means "clearing". The nearest village at this time was Ifield, centred around St. Margaret's Church.

The pattern of agriculture which has emerged in the area stems from the Middle Ages when the forest was cleared of its mighty Oaks, to keep the smelting furnaces fuelled.

There has been little change since then. The present Rectory replaced an older sandstone cottage, known as Street Cottage, which was purchased in 1967 for use as a rectory. The Old Rectory was a large house, demolished in the 1930's. It has been rebuilt and is now the residence of the Bishop of Horsham.

Something of a mystery surrounds the history of the Church.

It is not mentioned in the Domesday Book although this does not necessarily mean it did not exist. It has several architectural features that date it to the Saxon period so that it could be 1000 years old. Nobody knows for certain who built it although the rich abbey of Chertsey have been suggested as a likely patron. Thomas Horsefield, in the

"History and Antiquities of the County of Sussex" (1835) has also speculated that the Church may have been built by one of the Warren (or de Warenes) family who were the earliest owners.

The manor of Worth was attached to the Barony of Lewes, held by the Wareness, about 1089. The Advowson of the Church went with the manor until 1698 when John, son of Sir John Smith of Crabbet, sold the manor but kept the patronage of the Church. From 1786-1858, the patronage belonged to the Bethunes of Rowfant (hence the naming of the south transept, the Rowfant Chapel). The patronage subsequently belonged to the family of the Banks, Goddard and Waller Bridge, before Mrs. Waller Bridge eventually sold it to the Chichester Diocesan Patronage Board.

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

## Appendix 3 (a)

### 12 Tree Preservation Orders within the Worth Conservation Area

– Street Hill No. 1 Tree Preservation Order (Part)

**Schedule: Trees Specified Individually** (encircled in black on the map)

No. on Plan	Description	Situation	No. on Plan	Description	Situation
T1	Lime	Land on East side of Street	T22	Oak	
T2	Ash	Hill and Balcombe Road,	T23	Ash	
T3	Oak	Crawley, West Sussex, as	T24	Ash	
		shown on Plan No.P16.15.3	T25	Sycamore	
T5	Oak		T26	Sycamore	
T6	Horse Chestnut		*T27	Sycamore	
T7	Oak		T28	Sycamore	
T8	Horse Chestnut		T29	Sycamore	
T9	Oak		T30	Sycamore	
T10	Beech		T31	Double-Stemmed Sycamore	
T11	Yew		T32	Holly	
T12	Oak		T33	Wych Elm	
T13	Oak		T34	Wych Elm	
T14	Cherry		T35	Lime	
T15	Sycamore		T36	Oak	
T16	Hawthorn		T37	Oak	
T17	Holly		T38	Multi-Stemmed Beech	
T18	Hawthorn		T39	Oak	
T19	Holly		T40	Oak	
T20	Yew		T41	Oak	
T21	Oak				

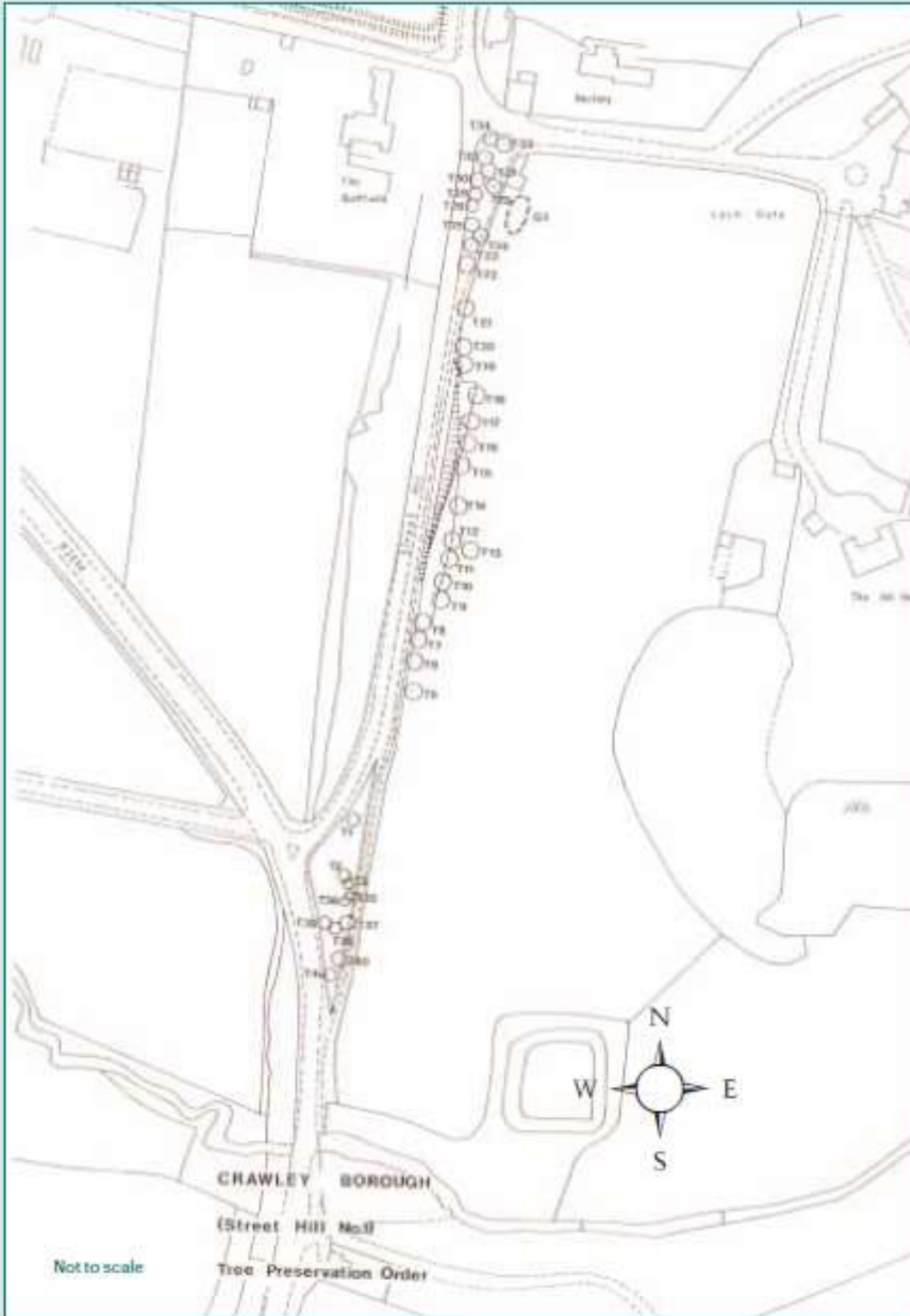
**Schedule: Groups of Trees** (within a broken line on the plan)

No. on Plan	Description	Situation
G1	Group consisting of 4 Oaks and 2 Beech	Land on East Side of Street Hill and Balcombe Road, Crawley, West Sussex as shown on Plan No. P16.15.3

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

## Appendix 3 (a)

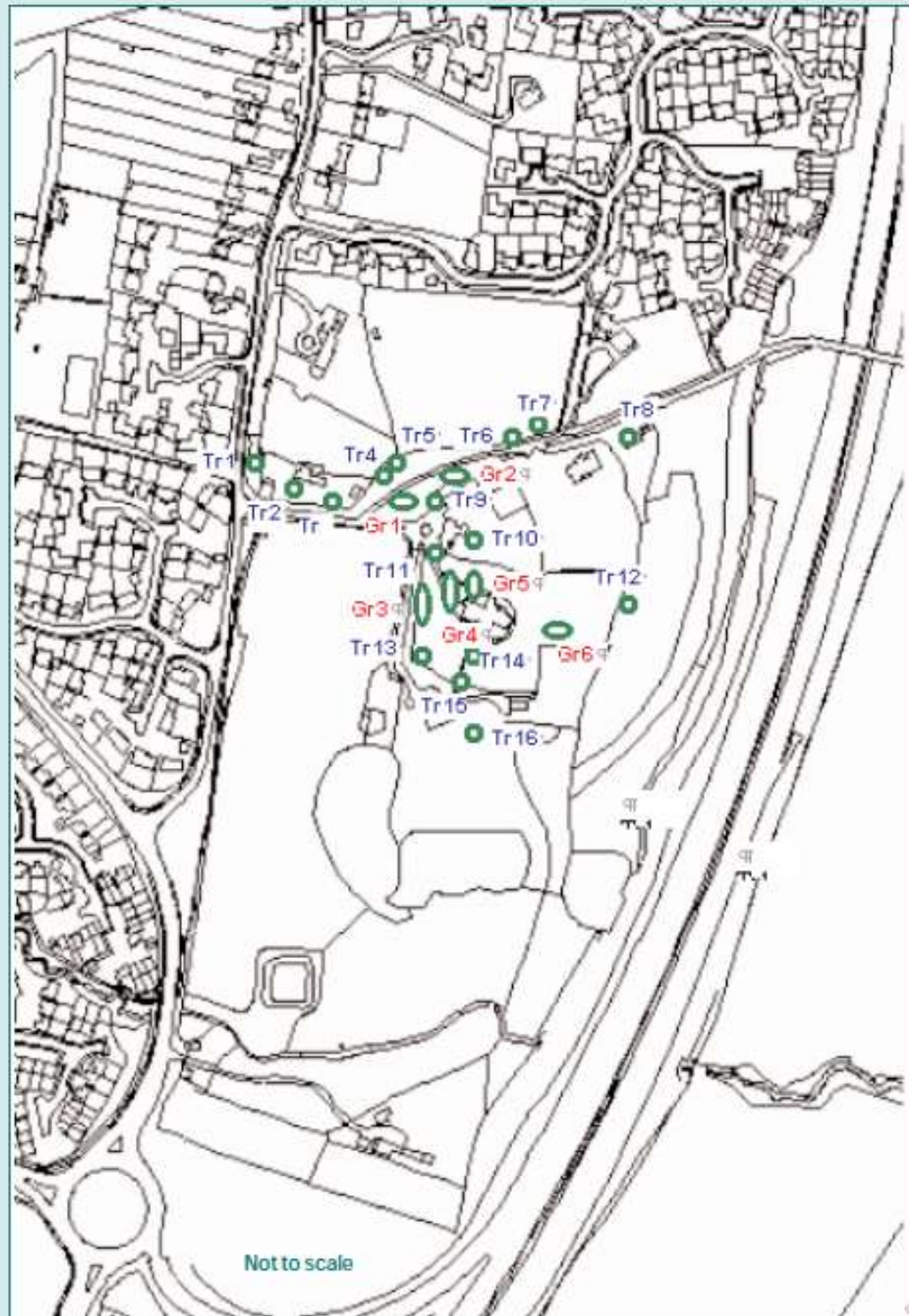
### Tree Preservation Order Plan



Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

## Appendix 3 (b)

### Other Important Trees



#### Schedule of other Important Trees in the Conservation Area

Tr 1	Horse Chestnut
Tr 2	Sycamore
Tr 3	Scots Pine
Tr 4	Lime
Tr 5	Oak
Tr 6	Sycamore
Tr 7	Lime
Tr 8	Oak
Tr 9	Turkey Oak
Tr 10	Yew
Tr 11	Horse Chestnut
Tr 12	Cedar
Tr 13	Beech
Tr 14	Yew
Tr 15	Yew
Tr 16	Copper Beech

#### Groups of trees

Gr 1	4 Lime
Gr 2	3 Beech
Gr 3	4 Lime, 1 Oak
Gr 4	2 Lime, 1 Oak and 1 Elm
Gr 5	1 Lucum Oak, 1 Copper Beech and 1 Beech
Gr 6	4 Sycamore

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

## Appendix 4

### Development in Conservation Areas

#### Policy BN2

The Council will seek to preserve or enhance the character and appearance of the conservation areas. Proposals for new development, including alterations, extensions or changes of use within or adjacent to conservation areas will only be permitted if:

- (i) the development respects the character of the locality and existing buildings in scale, grouping and materials;
- (ii) the development or change of use and the activity generated is compatible with the character of the conservation area;
- (iii) the development would not result in an expansion of a use which is incompatible with the character of the conservation area;
- (iv) views into and out of the conservation area will not be adversely affected.

Planning permission will not be granted in outline for development in conservation areas.

#### Policy BN3

Consent to demolish a building in a conservation area will not be granted unless the building is inappropriate in structure or design for the conservation area, or is wholly beyond repair. Any proposals for demolition must be accompanied by details of the proposals for the future development or use of the site which must meet the criteria in Policy BN2.

#### Policy BN4

Proposals for advertisements and signs in conservation areas will only be permitted if their size, design and siting respect the building and land on which they are displayed and do not detract from the character and appearance of the area. Free-standing signs should complement adjacent buildings.

#### Policy BN5

The Borough Council will seek to prevent the occurrence of, or will require the removal of, unsympathetic features or minor developments which have, or would have, and adverse impact on the character and appearance of a conservation area.

#### Policy BN6

The Borough Council will encourage statutory undertakers and the highway authority to have respect for the character and appearance of conservation areas when carrying out works within them.

15

This document can be made available in other formats on request. Please contact us if you would like a translation or copies in braille, large print audio tape or computer disk.

Please contact: Forward Planning on 01293 438578 or [forwardplanning@crawlley.gov.uk](mailto:forwardplanning@crawlley.gov.uk)

Visit the Council's web site for more information on this and other Council services.

[www.crawlley.gov.uk](http://www.crawlley.gov.uk)

Printed and published by Crawley Borough Council on environmentally friendly paper. November 2003.



Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

## APPENDIX J: WORTH MEADOWS SITE OF NATURE CONSERVATION IMPORTANCE, WEST SUSSEX COUNTY COUNCIL.

<b>Site:</b>	Worth meadows, Worth		
<b>Grid Ref:</b>	TQ 302 362	<b>Site Ref:</b>	Cr 5
<b>Owner:</b>	Private	<b>District:</b>	Crawley
<b>Area:</b>	5.8 hectares	<b>Parish:</b>	n/a
<b>Habitat:</b>	Neutral grassland, pond, scrub, semi-natural woodland		
<b>Date:</b>	Identified May 1992	<b>Author:</b>	Marion Finch

### Summary

The site is located just south of Worth Church and borders the M23. It encompasses several habitats in a relatively small area, including relatively species-rich meadows, two overgrown ponds, some woodland and a stream.

### Site description

The meadows have abundant Sweet Vernal-grass (*Anthoxanthum odoratum*) and are relatively herb-rich, with much Common Knapweed (*Centaurea nigra*), Oxeye Daisy (*Leucanthemum vulgare*), Bird's-foot-trefoil (*Lotus corniculatus*), Yarrow (*Achillea millefolium*), Sorrel (*Rumex acetosa*), Lesser Stitchwort (*Stellaria graminea*), and Meadow Buttercup (*Ranunculus acris*). Pignut (*Conopodium majus*), and other species more typical of woodland occur, including Wood Anemone (*Anemone nemorosa*), Bugle (*Ajuga reptans*) and Bluebell (*Hyacinthoides non-scripta*). Ant-hills indicate that at least part of the grassland is undisturbed.

The larger pond is virtually Willow carr, with shallow water and marshy margins. Bittersweet (*Solanum dulcamara*), Water Plantain (*Alisma plantago-aquatica*), Greater Spearwort (*Ranunculus lingua*), Gipsywort (*Lycopus europaeus*), Common Spike-rush (*Eleocharis palustris*), Remote Sedge (*Carex remota*), and Lesser Reedmace (*Typha angustifolia*) occur. The smaller pond has open water with abundant dead wood but little vegetation.

Both ponds are surrounded by trees, but two areas of woodland occur. One is dominated by Ash, Sycamore and Birch with Oak, Yew and pine over dense Hazel, Laurel and Rhododendron. The other, north of the small pond, is predominantly Pine and Horse Chestnut over Hawthorn, Hazel and Elder.

The stream is lined by Alder with Ramsons (*Allium ursinum*) on its banks.

### Management recommendations

The grazing regime needs to be adjusted as the northern meadow is overgrazed by horses and the southern fields need heavier grazing. Alternating between grazing and cutting for hay could help. The ponds need to be restored, although some carr could be retained. Rhododendron and Laurel should ideally be removed from the wood.

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

## **APPENDIX K: WRITTEN RESPONSE FROM ENGLISH HERITAGE REGARDING LAND EAST OF STREET HILL, WORTH (2014)**



**ENGLISH HERITAGE**

SOUTH EAST OFFICE

Mr Tom Nutt  
Crawley Borough Council  
Strategic Housing and Planning  
Town Hall, The Boulevard  
Crawley  
West Sussex  
RH10 1UZ

Direct Dial: 01483 252000

Direct Fax: 01483 252001

Our ref: PA00354463

10 November 2014

Dear Mr Nutt

### **Request for Pre-application Advice**

### **LAND EAST OF STREET HILL (30 DWELLINGS), WORTH, CRAWLEY, WEST SUSSEX**

Thank you for consulting English Heritage on this SHLAA Housing Site Update and the suitability of this site for inclusion in the Local Plan.

The proposed housing site would have the potential to impact on a range of designated and undesignated heritage assets, including the grade I listed St Nicholas Church, the Worth Conservation Area, archaeologically sensitive areas, and a locally listed historic park and garden.

English Heritage acts as the government's advisor on development proposals that would affect the significance of heritage assets, as set out under the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, and the provisions of Circular 01/01. We are a statutory consultee on planning applications that would in the opinion of the local planning authority affect the setting of grade I or II\* listed buildings, or the character and appearance of conservation areas. The impacts of proposals on grade II listed buildings and undesignated heritage assets are matters for the local authority in consultation with their own local conservation specialists.

The Church of St Nicholas is one of the best examples of an Anglo-Saxon church in the Country, recognised in its grade I listing. It is an important survival of an early church, all dating from one period. The church was originally established to serve one of the large hunting forests of the Weald in which many dispersed small settlements were located based on seasonal pannage and transhumance i.e. allowing pigs to feed on acorns and beechmast, and moving livestock from the lowlands in the summer to the Wealden forest in the winter.



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252000 Facsimile 01483 252001

[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

*English Heritage is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

*English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*



## ENGLISH HERITAGE

### SOUTH EAST OFFICE

The Worth Conservation Area Statement explains that the church was positioned at a convenient meeting point of tracks through the forest and existed for many hundreds of years in almost total rural isolation, only a few other buildings being built nearby until recent years. Despite the growth of Crawley and the construction of the M23 in recent decades, the largely rural situation of Worth Church and open character of the conservation area has remained. The boundaries of the conservation area were drawn specifically to protect this isolated rural character.

English Heritage considers that this rural setting is part of the church's significance as it provides its historic landscape context as well as contributing to the understanding of the story of its development in the forest serving the settlements of the Weald. Therefore, new development has the potential to affect its significance due to changes to the character and appearance of its setting and the appreciation of this sense of rural isolation. It also will impact on the character and appearance of the conservation area.

The Archaeology South East report has considered the impacts of the proposed housing site on the locally listed Historic Park and Garden, the Moat and other undesignated archaeology. Comments have also been received from the West Sussex County Archaeologist. In our view insufficient assessment of the impact of the proposal on the setting of the grade I listed church and on the character and appearance of the conservation area has been carried out to enable a judgement to be made regarding whether there would be harm to the significance of these designated assets.

We advise that a similarly detailed level of assessment as that for archaeology should be carried out for these heritage assets before a decision can be made on the suitability of the site for housing. In this respect, we consider that the following English Heritage published guidance: Conservation Principles (2008) and The Setting of Heritage Assets (2012) as being of particular importance in providing guidance on assessing the impacts of the proposal on the setting of the church.

The setting guidance defines setting as 'the way in which an asset is experienced'. This emphasis on experience allows us to think about setting not only in terms of intervisibility of assets and new development, but also to consider impacts in terms of how they affect our understanding of the historic development or function of historic places. Therefore the contribution that the existing rural environment makes to the significance of the church needs to be identified, including any historical functional relationship with that landscape or historic features and how change to the character and appearance of this environment could cause harm to the appreciation and



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH  
Telephone 01483 252000 Facsimile 01483 252001  
[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

*English Heritage is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All Information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

*English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*



## ENGLISH HERITAGE

### SOUTH EAST OFFICE

experience of the heritage asset. From this assessment the local authority will therefore need to be confident that sufficient land would remain to retain this sense of rural isolation and also that there would be no harm to this appreciation and experience from any visual urban intrusions, including impacts from increased traffic, noise, light pollution etc. In this respect Accurate Visual Assessments (AVR's) are useful in demonstrating any levels of potential harm. The potential impact of the proposals on setting in the winter months should also be analysed.

As part of this further work, we consider that the character and appearance of the Worth Conservation Area should be more clearly articulated and appreciated beyond that of providing a setting to the church. In our view, it would appear to be a remarkable survival of undeveloped land in Crawley that is rich in time depth, containing a range of designated and undesignated heritage assets, some that are interrelated and at one point physically connected. The impact of the proposal on this special character and appearance needs to be fully considered.

Once the above analysis has been undertaken, any proposal should be assessed against the National Planning Policy framework of the NPPF and in particular chapter 12 alongside local planning heritage policies and guidance for the area.

We trust these comments are of use in helping to come to a decision on the suitability of this land as a housing site.

Yours sincerely

**Alma Howell**  
Assistant Inspector of Historic Buildings and Areas  
E-mail: [alma.howell@english-heritage.org.uk](mailto:alma.howell@english-heritage.org.uk)



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252000 Facsimile 01483 252001

[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

*English Heritage is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All Information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

*English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*



## ENGLISH HERITAGE

SOUTH EAST OFFICE

### **LAND EAST OF STREET HILL (30 DWELLINGS), WORTH, CRAWLEY, WEST SUSSEX**

**Request for Pre-application Advice**

#### **Information Provided**

Land East of Street Hill SHLAA Update May 2014.pdf; Archaeology South East Final report.pdf; Proposed layout.jpg; Worth Map Core Strategy.jpg; Worth Map Legend.jpg

#### **Published Guidance**

The Setting of Heritage Assets (Revised 2012)  
Conservation Principles (2008)

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

## **APPENDIX L: WRITTEN RESPONSE FROM WEST SUSSEX COUNTY COUNCIL REGARDING LAND EAST OF STREET HILL, WORTH (2015)**

Don Baker: Team Manager  
033 022 26439 (Direct)  
don.baker@westsussex.gov.uk

Environment and Heritage,  
Residents' Services Directorate  
www.westsussex.gov.uk  
County Hall  
Chichester  
PO19 1RQ  
01243 777100



---

### **Land East of Street Hill, Crawley**

### **Policy H2: Proposed Housing Site: Omission Site**

### **WSSC Ecological Written Statement**

**24 February 2015**

---

#### Personal Statement: Qualifications and Experience

This is a statement provided by:

Don Baker, Senior Ecologist and Team Manager for the Environment and Heritage Team,  
West Sussex County Council (WSSC).

I hold the following qualifications:

- (i) N.Cert. Practical Habitat Management
- (ii) N.Dip. Countryside Recreation and Rural Studies
- (iii) B.Sc (Hons) Ecology and Conservation

I have been a Full Member of the Chartered Institute of Ecology and Environmental  
Management since 2001.

Since 1989, I have gained considerable knowledge and expertise in land management,  
biological research and conservation, data management, co-ordinating plan development,  
provision of scientific advice and development control.

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

I have been employed by WSCC as an ecologist since 2002. My remit is to ensure WSCC follows best practice in its roles and responsibilities with regard to biodiversity and to provide specialist ecological advice with regard to the planning process to other West Sussex Local Planning Authorities as requested.

### Introduction

1. Land East of Hill Street is being promoted for inclusion as a potential housing site within policy H2. It is currently considered for omission. The proposed site is contained entirely within a designated Site of Nature Conservation Importance. The proposed site is not considered suitable for inclusion with policy H2 of the Crawley Borough Local Plan. Its inclusion is considered to be counter to local and national policy.

### Background to SSCI designation

2. SSCI's have been designated in West Sussex since 1992. Site of Nature Conservation Importance (SNCI) is a designation used in many parts of the United Kingdom to protect areas of importance for wildlife at a county scale. In other parts of the country the same designation is known by various other names, including Site of Importance for Nature Conservation (SINC), County Wildlife Site and Site of Metropolitan Importance for Nature Conservation. Overall, the designation is referred to as a 'non-statutory wildlife site'. Such sites are generally considered high priority for conservation action and afforded protection through the planning system.
3. SSCI's represent the best sites for nature conservation outside of the statutory process. Typically, they are protected by policy in national planning guidance and Local Development Plan Documents. Planning Practice Guidance (PPG) paragraph 12 states:  
*"Local designated sites (which include 'Local Wildlife Sites' [...]) make an important contribution to ecological networks [...]"*

### Status of the site

4. The site concerned was designated a Site of Nature Conservation Importance in May 1992 (Worth Meadows Cr05). It is described as Neutral grassland, pond, scrub, semi-natural woodland.

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

### Legal

5. Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. As described in paragraph 7 of the PPG, a key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector.

### Policy considerations

6. In accordance with NPPF (e.g. paragraphs 109, 113, 114) Crawley Borough Council has set an appropriate policy to protect sites such as Worth Meadows SNCI. Through this policy the LPA has satisfied the penultimate bullet of paragraph 157.
7. SNCIs (and protected species) are specifically listed within submission Crawley Submission Policy ENV2(c) and the policy warns that:

*“Proposals which would result in significant harm to biodiversity will be refused unless:*

- i) this can be avoided by locating on an alternative site with less harmful impact; or*
- ii) the harm can be adequately mitigated, or, as a last resort, compensated for.”*

8. The key policy test is encapsulated in line ENV2(c)(i). As this site is being promoted for inclusion within the Local Plan and the Crawley Local Plan has identified less sensitive, undesignated sites for development elsewhere, then we can conclude that suitable alternative sites have been found. Does the need for the additional 30 houses proposed override the nature conservation value of the land it will replace? Given that the housing need is addressed by other sites it seems that the proposed East of Street Hill site would fail this ‘planning balance’ test as both a potential Local Plan Allocated Site and as a future planning application.

### Land East of Street Hill, Crawley: Policy H2: Proposed Housing Site: Agent Response

9. The promoter relies heavily on paragraph 22 (Reference ID: 3-022-20140306) particularly in the Crawley Submission Local Plan Representation of the PPG supporting the NPPF. PPG paragraph 44 is clear that in assessing housing and economic needs as they affect such land



*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

as is at issue here, and that The National Planning Policy Framework should be read as a whole, stating:

*“The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs 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.”*

Thus the site promoted for allocation must also be measured against other Framework policies and, indeed principles, such as paragraphs 17, 109, 110, 113, 114, 117, 118, & 157. Crawley BC have identified land where development would be inappropriate, for instance because of its environmental significance and an appropriate policy seeking to protect SNCIs has been set.

10. The site remains designated as an SNCI and with regard to the quoted PPG Paragraph 22 the LPA has no authority to remove the designation to provide an unimpeded site for development. This results in a substantial barrier to the site’s suitability.
11. Tony Fullwood Associates’ (TFA) response to CBC’s decision not to include Land East of Hill Street significantly under-plays the value of the SNCI by stating “The Worth meadows SNCI is of local interest with the lowest status and weight in terms of the hierarchy of sites of nature conservation value”. It is important to note that ‘local’ means County level not site, community or town level. This site is not important for Crawley but for the County.
12. Following and ecological survey, a panel of specialists will test the site’s suitability for inclusion into the SNCI portfolio. The proposed SNCI is put through a rigorous assessment process similar to that applied to the designation of SSSIs (the Ratcliffe Criteria). SNCIs do indeed sit below the statutorily designated SSSIs but SSSIs are designated because they are considered to be the best of example of their habitat type. After initial assessment the criterion for selection is conceptually different. SNCIs represent the best sites for nature conservation outside of the statutory process. Typically, they are protected by policy in national planning guidance and Local Development Plan Documents. Planning Practice Guidance (PPG) under the Biodiversity section (paragraph 12) states: *“Local designated sites (which include ‘Local Wildlife Sites’ [...] make an important contribution to ecological networks [...]);* also refer to NPPF paragraph 109 & 117 concerning ecological networks.

*Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.*

13. TFA's response makes the offer of funding the retained site's rehabilitation through the development to repair years of neglect. I suggest that this is a secondary consideration and that this should be an issue for attention only after it has been judged that there are no alternatives open to the LPA to deliver its housing need and that the wider benefits of a proposed development outweigh the loss of one third of the designated SNCI.

#### The ecology Report

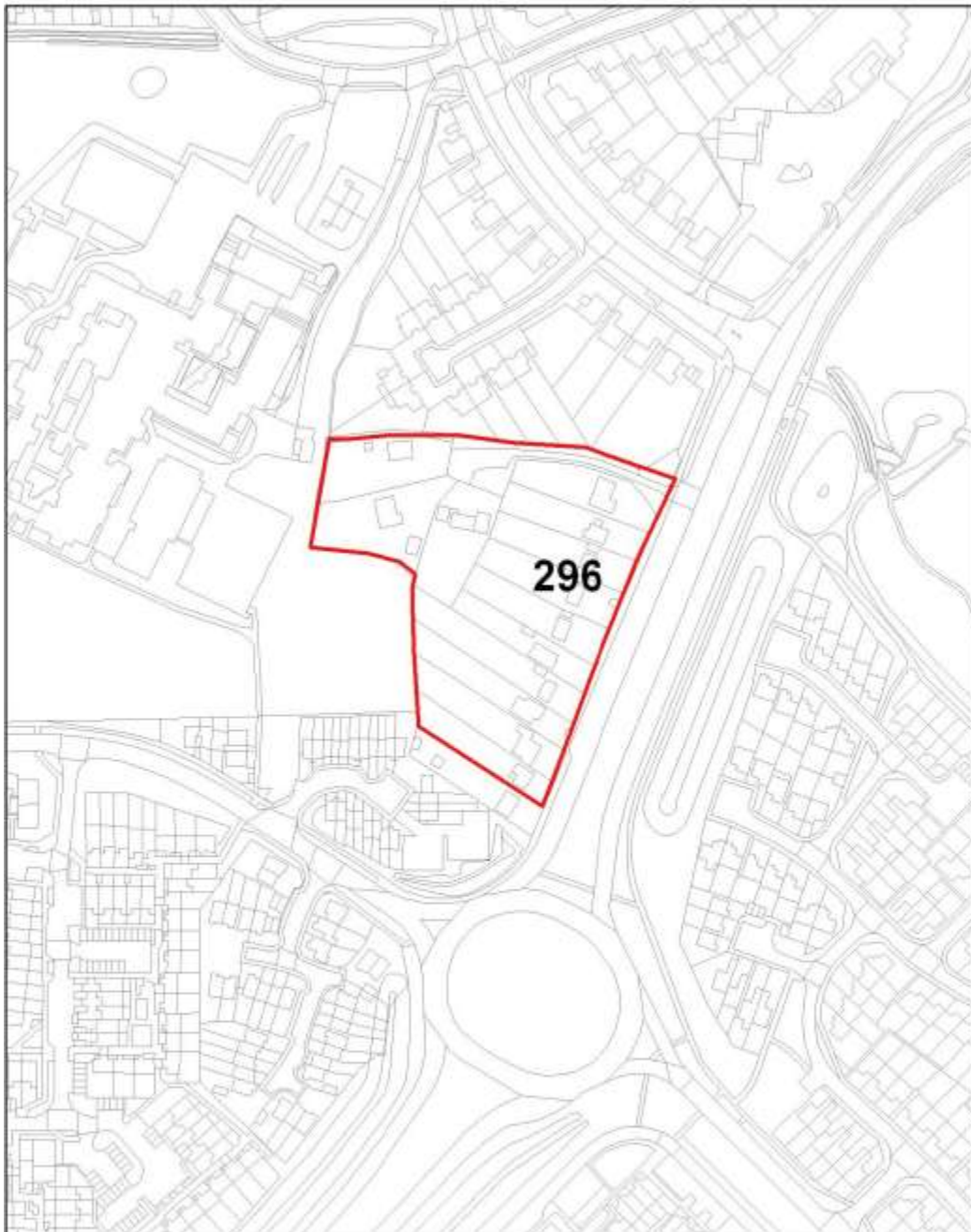
14. The Extended Phase 1 ecological report was completed 14<sup>th</sup> October 2013 given the lateness of the season a follow up survey during an earlier part of the next survey season would have been helpful. As the survey report rightly indicates (s2.4.2) "The survey was conducted on a single visit and due to seasonal constraints botanical species present may be omitted from this report". This is a sub-optimal time of year to make a botanical assessment for s.7.3 to be confirming that there are no rare or endangered plant species within the proposed development site. I believe that there may be a notable typo in s7.3; please note that an SNCI is a designation and a third of the site would be lost to development; I suspect the author was referring to the statutory protected such as Sites of Special Scientific Interest or 'other' designated sites.
15. A number of Phase 2 ecological surveys for legally protected species have been recommended but no opportunity has been taken to carry them out over the last recording season. The expected presence of a range legally protected species is described as moderate to high. Other considerations aside, the LPA has not had the benefit of the additional recommended detailed surveys enabling them to understand the site's specific constraints and assess the potential mitigation arising.

#### Conclusion

16. The proposed site is not considered suitable for inclusion with policy H2 of the Crawley Borough Local Plan. Its inclusion is considered to be counter to local and national policy.

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

**APPENDIX M: SHLAA Extract for Land Adjacent to Horsham Road and south of Silchester Drive (Category I, sites that suitable but currently undeliverable)**



<p><b>CRAWLEY BOROUGH COUNCIL</b>                  FORWARD PLANNING                  TOWN HALL, THE BOULEVARD                  CRAWLEY, WEST SUSSEX                  RH10 1JZ</p>	<p>Land Adj to Horsham Road &amp; south of Silchester Drive</p>	
<p><small>This map is reproduced from Ordnance Survey data with the permission of Ordnance Survey in behalf of the Controller of Her Majesty's Stationery Office © Crown Copyright. Unauthorised reproduction infringes Crown copyright and may lead to criminal sanctions. Crawley Borough Council 10002711 - 2009</small></p>	<p>Reference No: 296</p>	<p>Scale 1:2,115</p>
	<p>Date: August 2012</p>	<p>Revisions:</p>
	<p>Drawing No: 1</p>	

Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

±

<b>Site Reference</b>	296	<b>Neighbourhood</b>	<u>Gossops Green</u>
<b>Site Name / Address</b>	Land Adjacent to Horsham Road & South of <u>Silchester Drive</u>		
<b>Existing Land Use (s)</b>	PDL/Greenfield – Several detached dwellings and associated gardens.		
<b>Site Area (Gross hectares)</b>	1.32	<b>Current Density</b>	10 Dwellings per Hectare
<b>Site Suitability</b>	<b>Yes</b> – The site is in a sustainable location adjacent to one of the main thoroughfares in <u>Gossops Green</u> (Horsham Road). The existing layout of the site is underdeveloped, and thus, there is an opportunity to increase the number of residential units within this location. A planning application (CR/2008/0586/FUL) for the erection of a care home and the demolition of the existing buildings was permitted, but never commenced. In addition, a planning application (CR/2012/0130/FUL) for the erection one dwelling adjacent to <u>Silchester</u> has also been permitted.		
<b>Site Availability</b>	<b>No</b> - The site is formed of a number of separate gardens in individual landownership and as there has been no approach from landowners or developers expressing any interest to pursue the site for housing development, it is not considered to be available at this time.		
<b>Site Achievability</b>	<b>Yes</b> –If willingness was shown from landowners to re-develop the site for housing, there would appear to be no overriding constraints which would prevent the site being intensified. However, the Tree Preservation Orders (TPOs) in the rear gardens of several properties would require some thought in relation to the layout of the site.		
<b>Action Required / Constraints</b>	The site is not currently available. The site may come forward as a windfall		
<b>Deliverability/ Developability</b>	Not currently developable		
<b>Summary</b>	The site is suitable for housing development. However, it is currently unavailable as there is no commitment from the landowner to bring the site forward for development		