

Crawley 2030:  
Crawley Borough Local Plan 2015 – 2030

# Breezehurst Drive Playing Fields Development Brief

June 2018





## Contents

<b>1</b>	<b>Introduction</b>	<b>4</b>
	Figure 1: Location of Breezehurst Drive Playing Fields	
	Development Brief Preparation	5
	Breezehurst Drive Playing Fields Housing and Open Space Site	5
	Crawley Borough Local Plan Policy H2 extract	
	Key Local Plan Policies and Supporting Documents	6
	Figure 2: Local Plan Map Extract	
<b>2</b>	<b>The Site in Context</b>	<b>9</b>
	Site Location	9
	Site Description and Current Uses	9
	Figure 3: View Eastwards across the Site	
	Figure 4: Site in the Context of the Surrounding Land Uses	
	Figure 5: Character of the Site and Surrounding Area	
	Development Principles	11
<b>3</b>	<b>Development Principle 1: Residential Development</b>	<b>13</b>
	Development Quantum	13
	Housing Mix	13
	Design Quality	15
	Transport and Access	15
	Open Space and Landscape Setting	16
	Environmental Sustainability	16
	Environmental Protection	17
	Key Local Plan policies and relevant documents	
<b>4</b>	<b>Development Principle 2: Open Space Provision</b>	<b>18</b>
	Retention pitch provision to the south of the pavilion	18
	Provision of enhanced pitch drainage off-site	19
	3G pitch provision	19
	Breezehurst Community Pavilion & new or retained provision of changing facilities	20
	Allotments	21
	Key Local Plan policies and relevant documents	
<b>5</b>	<b>Development Principle 3: Green Infrastructure</b>	<b>23</b>
	Green Infrastructure approach	23
	Multi-functionality and providing opportunities for walking/cycling	23
	Trees and hedgerows	24
	Dousters Brook	24
	Site of Special Scientific Interest	25
	Key Local Plan policies and relevant documents	
<b>6</b>	<b>Application Requirements:</b>	<b>26</b>
	Flood Risk and Sustainable Drainage	26
	Dousters Brook	
	Water Stress	26
	Utilities and Drainage	27
	Social infrastructure	27
	Highways and Access	27
	Noise	28
	Air Quality and Emissions Mitigation Assessment	28
	Long Distance View Splay	28
	Community Consultation	28
	Developer Contributions and Community Infrastructure Levy (CIL)	29
	Key Local Plan policies and relevant documents	

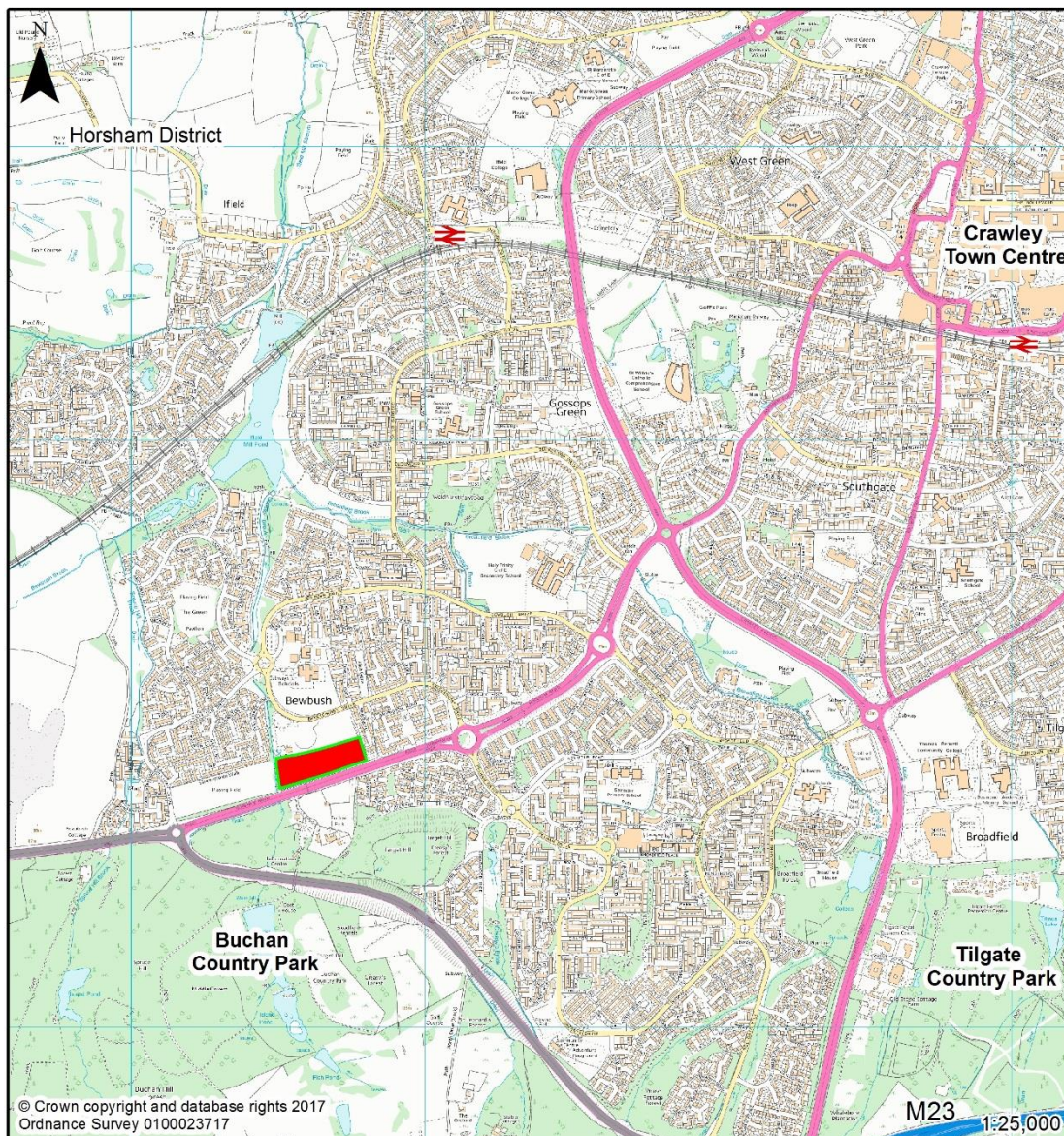


<b>Development Requirements Checklist</b>	<b>30</b>
<b>Appendix A: Inspector's Final Report Extract</b>	<b>31</b>
<b>Appendix B: Bewbush Allotments Waiting List</b>	<b>32</b>

# 1. Introduction

A Development Brief is a non-statutory planning guidance document that informs developers and other interested parties of the constraints and opportunities presented by the site, and the type of development expected or encouraged by the Crawley Borough Local Plan<sup>1</sup>. It is a site-specific document which forms a stepping stone between the provisions of the Local Plan and the requirements of a planning application.

This Development Brief covers a greenfield site on land south of Breezhurst Drive, Bewbush, in the south west corner of Crawley. The site is allocated for development and enhancement as a Housing and Open Space Site by Policy H2 of the Crawley Borough Local Plan (the Policy extract is set out on pages 5-6 below).



**Figure 1: Location of Breezhurst Drive playing fields.**  
The allocated Housing and Open Space site is shown by the red area with green boundary.

<sup>1</sup> Crawley 2030: Crawley Borough Local Plan 2015 – 2030 (adopted December 2015) CBC



This Development Brief has been prepared to support the delivery of the site and expands upon the criteria and description set out in the Policy and supporting text in the Local Plan. It seeks to provide guidance to aid conformity and adherence to the Local Plan requirements from the early stages of the design and layout of a proposed development scheme. Planning decisions should be made in conformity with the Local Plan policies, and the purposes of this Development Brief is to assist in achieving the requirements of the Local Plan policies for development on this site. Whilst this document is not a formal statutory Supplementary Planning Document, in providing matters pertaining to the development of the site in accordance with the Crawley Borough Local Plan it forms part of the material planning considerations for the purposes of Development Management decisions. The relevant Local Plan policies are referenced throughout this document alongside the associated supporting guidance.

Detailed guidance set out in this Development Brief will help ascertain the type of development suitable and appropriate to the site and help facilitate the planning application process. Through the use of this Development Brief, the council seeks to influence the design of any development on the site so as to bring about high quality development, ensure any mitigation and compensation measures to offset the loss of existing open space and playing fields, and limit any adverse impacts on the amenity of existing and future residents as required by the Crawley Borough Local Plan.

## Development Brief Preparation

This document has been prepared in order to provide a planning framework and guidance for prospective developers considering development on this site. It seeks to expand upon the criteria set out in Policy H2 and collate detail from the supporting evidence base documents, to provide a clear position as a starting point for the design of development, and to assess proposals against.

This Development Brief has been adopted by Crawley Borough Council on 21 June 2018 following informal engagement with key stakeholders leading up to a formal eight week public consultation undertaken between November 2017 and January 2018.

Comments received during the public consultation have been taken into account in preparing the final adopted Development Brief. All representations received have been collated and summarised in the consultation statement which accompanies the Development Brief (published separately) along with the details of the council's response and where changes have been made to this Development Brief as a consequence.

## Breezehurst Drive Playing Fields, Housing and Open Space Site

### Crawley 2030: Crawley Borough Local Plan 2015 – 2030 (Local Plan Policy H2)

Crawley's Local Plan makes provision for the delivery of housing sites to meeting housing need through **Policy H2: Key Housing Sites**. This Development Brief covers the key site of Breezehurst Drive Playing Fields. This policy requires the preparation of a Development Brief to set out in full the requirements of the site as a mix of housing and open space:

#### Policy H2: Key Housing Sites (extract)

##### Housing and Open Space Sites

- Breezehurst Drive Playing Fields, Bewbush (developable) 65 dwellings\*, mixed use recreation/residential. Development of this site must include:
  - i. the retention of good quality pitch provision to the south of the pavilion; provision of enhanced pitch drainage off-site; and,

- ii. new or retained provision of changing facilities to be directed towards Skelmersdale Walk Playing Fields or other suitably located provision to meet future fluctuations in demand for pitch sports.
- iii. Consideration should also be given to the provision of allotments off-site should demand from residents exist.

These requirements will be set out in full in a Development Brief.

\* Indicative capacity.

### Reasoned Justification

6.51 *In determining how far Crawley can meet its own housing needs, detailed assessments have been carried out to ensure the town balances competing land uses in a sustainable manner. This includes landscape character assessments, open space and economic growth assessments alongside the Urban Capacity Study and Strategic Housing Land Availability Assessments. Two sites have been identified and allocated on the Local Plan Map for 'Housing and Open Space'. These are Tinsley Lane, Three Bridges (Deliverable) and Breezehurst Drive, Bewbush (Developable). The layout of these sites has been considered in more detail to ensure they can deliver the quantum of housing within the constraints identified by the open space study for meeting recreational open space needs<sup>2</sup>. A Development Brief will be prepared for each of these sites to ensure their development adheres to the requirements of the Open Space, Sport and Recreation Study and Playing Pitch Study; critical elements of these are set out in the Policy. For Tinsley Lane this will involve consideration into the needs of the existing football club; whilst for Breezehurst Drive sports pitch improvements will be required both on-site and off-site. The balance between housing and on-site open space will be determined through the design and layout of a detailed scheme.*

## Key Local Plan Policies and Supporting Documents

The Local Plan must be read as a whole. However, the following policies are of particular relevance to the site:

### Character

CH2	Principles of Good Urban Design
CH3	Normal Requirements for New Development
CH4	Comprehensive Development
CH5	Standards for All New Dwellings
CH6	Tree Planting and Replacement Standards
CH7	Structural Landscaping

### Housing

H1	Housing Provision
H2	Key Housing Sites
H3	Future Housing Mix
H4	Affordable/ Low Cost Housing

### Environment

ENV1	Green Infrastructure
ENV2	Biodiversity

<sup>2</sup> In accordance with paragraphs 73 and 74 of National Planning Policy Framework (2012) DCLG

ENV3	Open Space, Sport and Recreation
ENV5	Provision of Open Space and Recreation
ENV6	Sustainable Design and Construction
ENV8	Development and Flood Risk
ENV11	Development and Noise
ENV12	Air Quality

**Infrastructure**

IN4	Car and Cycle Parking Standards
-----	---------------------------------

**Supplementary Planning Documents (SPDs)**

Whilst there is a focus on certain topic areas, development should adhere to the full range of policies for residential and open space development set out in the Local Plan, supporting Supplementary Planning Documents (SPDs) and the National Planning Policy Framework (NPPF). The applicant should also refer to national and local validation requirements for submitting planning applications.

The [Urban Design SPD](#) provides clear guidance on good design to a range of end users, including developers and applicants so as to bring forward successful developments based on good urban design principles. Good urban design leads to the creation of 'places' that are functional, desirable, enjoyable, sustainable, safe and inclusive.

The [Green Infrastructure SPD](#) sets out the key elements which make up the important Green Infrastructure network assets within the borough and expand upon the Local Plan policies established to protect and enhance this network.

Further information and guidance in relation to designing developments in relation to mitigation and adaptation for climate change is provided in the [Planning and Climate Change SPD](#).

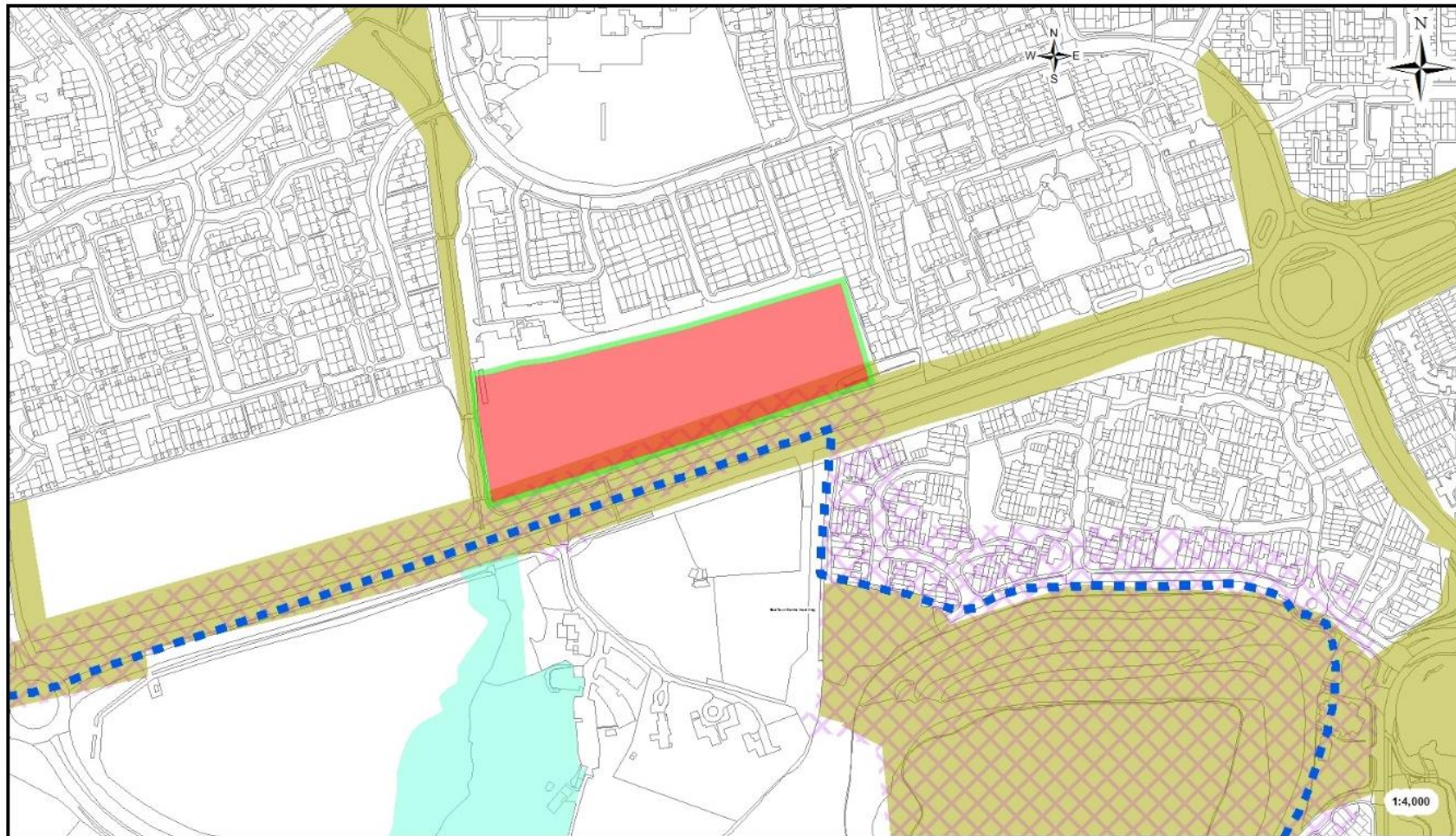
The [Affordable Housing SPD](#) provides additional guidance in relation to meeting the Local Plan requirement for all new residential development to provide 40% affordable housing.

Development on the subject site should meet the objectives set out in the SPDs, as they provide clear advice and up-to-date information in relation to the implementation of the Local Plan policies.



Figure 2: Local Plan Map Extract

- |   |   |   |   |
|---|---|---|---|
|  | Housing and Open Space (Policy H2)        |  | South of Broadfield Rural Fringe (Policy CH9)     |
|  | Built-Up Area Boundary (Policy CH9 & EC9) |  | Site of Special Scientific Interest (Policy ENV2) |
|  | Bewbush Rural Fringe (Policy CH9)         |  | Structural Landscaping (Policy CH7)               |



## 2. The Site in Context

### Site Location

The site is located on the edge of Bewbush neighbourhood and Crawley itself. Existing housing borders the site to the north and east, with playing fields to the west. Bewbush Community Pavilion is situated adjacent to the north-west corner of the allocation; and the A2220 Horsham Road forms the southern boundary for the site. Beyond this road is Buchan Country Park, within Horsham District.

Bewbush Neighbourhood Centre, consisting of shops and community centre, is a five minute walk from the site. The nearest bus stop, serving the rest of the town including Gatwick Airport, is located on Breezehurst Drive (a 1 – 2 minute walk). The site lies two miles from Crawley town centre; accessed by walking (40 minutes), cycling (15 minutes), bus (15 minutes) or car (6 minutes).

### Site Description and Current Uses

The 2.71 hectare site is currently in the ownership of Crawley Borough Council and consists entirely of existing playing field, which is not currently marked out for sports use. A line of trees/hedgerow is located on the southern boundary and alongside Dousters Brook on the western boundary of the site.



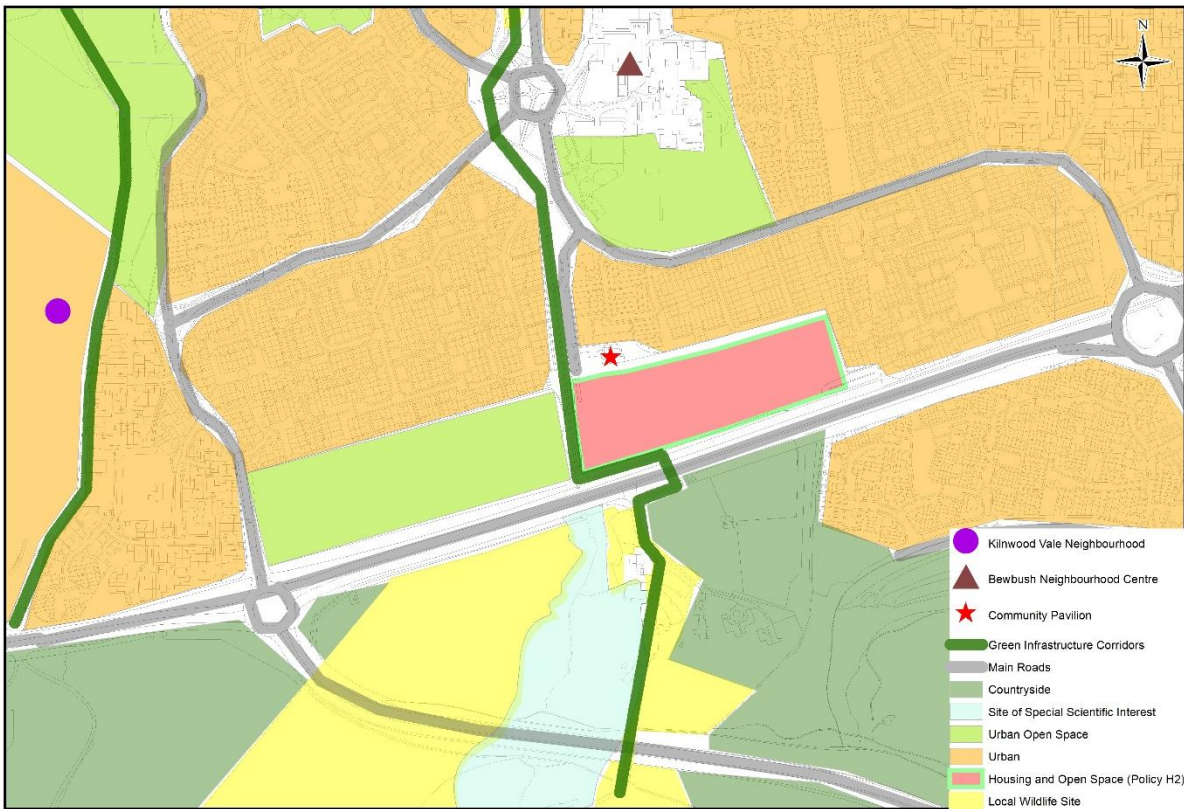
**Figure 3: View Eastwards across the Site.**

Current road access to the site is from Breezehurst Drive, through a car park north-west of the site. Pedestrian access from the recently-developed area adjacent to the northern boundary is blocked by a continuous fence.

Pedestrian/cycle access is from Breezehurst Drive to the north, Skelmersdale Walk from the west or from the south over a bridge that links the site to Buchan Country Park. A narrow footpath leads from the south east corner of the site to the housing area to the east.

The Breezehurst Community Pavilion, a changing room/social facility for sports clubs, sits adjacent to the north-west corner of the site. The pavilion has not been in use for four years. To the east of the pavilion lies a ground source heat pump.





**Figure 4: Site in the Context of Surrounding Land Uses**

The site is open and flat. At the eastern boundary the site is enclosed by ball stop netting, hedgerow and a fence with housing behind.

The northern edge is adjacent to new build housing two storeys in height and with three storey flat blocks. The housing features a perimeter block layout which provides clear demarcation of public and private spaces with active frontages onto important routes and allows for direct views south over the Breezehurst playing fields.

The architecture of the recent new build development is robust and uncluttered and relates to the Crawley vernacular but in a more modern style. Buildings tend to feature dual pitched roofs with flat roofed porches, and are constructed from brick and weatherboard. Slight variations to the colour palette throughout maintain variety and interest without detracting from consistency. Dwellings at key locations feature second floor windows set into cladded elements to accentuate focal points.

The natural elements of the site include cultivated grass kept short for formal football matches and informal recreation. On the south side abutting the allocation lies a hedge and a band of mature trees that screen and soften the site visually from the Horsham Road.

The west side of the site abuts a band of trees/hedgerow and Dousters Brook which runs south to north from Buchan Country Park into Crawley northwards to join the River Mole.



Figure 5: Character of the Site and Surrounding Area

## Development Principles

Through the Local Plan Examination and assessment of the site and its context, key areas have been identified which need further guidance to support the delivery of the site allocation.

These are considered as areas requiring more targeted policy direction and guidance within the Breezehurst Drive Development Brief. The remainder of this document is structured around these key Development Principles, which are identified as follows:

- **Development Principle 1: Residential Development**  
Sustainable development on the site will complement Crawley's character as a compact town within a countryside setting, and will maintain the neighbourhood structure by maximising the site's residential capacity to meet the borough's housing needs whilst providing a good standard of amenity for all existing and future occupants.
- **Development Principle 2: Provision of Open Space and Sports Facilities**  
Development of this site will balance the loss of open space, and increased population, with new and enhanced provision of open space that better meets the needs of the community.
- **Development Principle 3: Retaining and Enhancing Green Infrastructure**  
Green Infrastructure must be fully integrated into the development, to ensure it functions successfully and creates well-designed, safe and visible links between the neighbourhood and green spaces.
- **Application Requirements**

### **Development Principle 1: Residential Development**

Sustainable Development on the Site which:

- Complements Crawley's Character
- Reflects the Compact Town in a Countryside Setting
- Maintains the Neighbourhood Structure
- Maximises Residential Capacity
- Ensures a Good Standard of Amenity

### **Development Principle 2: Open Space Provision**

New and enhanced provision of Open Space to:

- Balance the Loss of Provision and Increased Population
- Better meet the Needs of the Community

### **Development Principle 3: Green Infrastructure**

Provision, Design and Layout of Green Infrastructure which:

- Is Fully Integrated into the Development
- Functions Successfully
- Creates Well-Designed, Safe and Visible Links between the Neighbourhood and Green Spaces



### 3. Development Principle 1: Residential Development

#### Principle 1:

**Sustainable development on the site will complement Crawley's character as a compact town within a countryside setting, and will maintain the neighbourhood structure by maximising the site's residential capacity to meet the borough's housing needs whilst providing a good standard of amenity for all existing and future occupants.**

#### Development Quantum

The Local Plan allocation for the site, **Policy H2: Key Housing Sites**, identifies an indicative figure of 65 units.

If the development were to be a similar density as the development immediately to the north, the number of units would be between 45 – 65, being a mixture of housing and flats in a preferred perimeter block layout. The upper figure would need to incorporate approximately 50% flatted development.

#### Development Guidance:

*The specific number of units feasible should be established via an informed masterplanned approach designing into the scheme the requirements of the allocation and any necessary mitigation measures.*

In maximising the site's residential capacity, the quality of life and good standard of amenity for residents should not be compromised. As required by **Policy CH5: Standards for All New Dwellings**, the dwellings should, at least, be capable of adapting to the changing needs of residents through the application of Building Regulations Part M Category 2 – accessible and adaptable dwellings, meet the minimum Nationally Described Standards for internal space, and be laid out and designed in accordance with the external space expectations set out in the Urban Design SPD.

#### Development Guidance:

*The principles of urban design best practice as set out in the council's Urban Design Supplementary Planning Document (SPD) should be considered, with the aim of establishing a sustainable housing development with a strong sense of place.*

#### Housing Mix

**Policy H3: Future Housing Mix** establishes that developments should provide a mix of dwelling types and sizes to address local housing need and demand. Whilst acknowledging that housing mix may be driven by the site's characteristics and viability, the proposals should have regard to the council's Strategic Housing Market Assessment and any subsequent updates<sup>3</sup> with respect to housing needs and demand within Crawley. A recent study on market housing mix for Crawley has been published<sup>4</sup> which provides the starting point for the mix of housing expected for this site.

The supporting text for **Policy H3** provides the recommended mix of dwelling sizes for the affordable housing element within any development scheme. Whilst the demand for those in local housing need falls predominantly towards the smaller one-bedroom and two-bedroom

<sup>3</sup>[http://www.crawley.gov.uk/pw/Planning\\_and\\_Development/Planning\\_Policy/Crawley2029/INT196738](http://www.crawley.gov.uk/pw/Planning_and_Development/Planning_Policy/Crawley2029/INT196738)

<sup>4</sup> Market Housing Mix: Crawley Borough Council and Horsham District Council (November 2016) Chilmark Consulting Ltd



units, there remains an important requirement for some larger and family units and this site’s greenfield location within a neighbourhood means it is ideally suited to provide some larger units.

The Local Plan is clear that it should not be regarded that affordable housing may be provided in only flatted accommodation by virtue of the requirement for smaller house types. In order to achieve reasonable levels of integration of tenures within the scheme, and to manage the level of clustering of tenure-types, the mix of affordable housing units will be expected to broadly mirror the mix of unit types intended within the wider scheme, and provide a balanced ratio of family accommodation alongside the requirement for smaller unit types.

<i>Development Guidance:</i> <i>The mix of housing sizes on the site should use the following table as the starting point to address the borough’s housing needs.</i>			
Housing Size	Owner Occupier Market Housing <sup>5</sup>	Private Rental Market Housing <sup>6</sup>	Affordable Housing <sup>7</sup>
1 Bed	10%	5%	25%
2 Bed	30%	30%	50%
3 Bed	35%	40%	20%
4+ Bed	25%	25%	5%

The requirement for affordable housing provision is established in **Policy H4: Affordable & Low Cost Housing** and, unless viability is constrained, the development should deliver 40% affordable and 10% low cost housing. In accordance with the Policy, the council expect a minimum of 70% of the affordable housing to be Affordable Rent (or Social Rent where other forms of subsidy exist) and up to 30% Intermediate tenure. This reflects the council’s preference for rental accommodation to address local housing needs and local affordability, whilst also aiming to achieve a suitable balance of tenures to address the spectrum of affordable housing needs.

The **Affordable Housing Supplementary Planning Document** provides a greater level of detail in relation to planning application submission requirements for policy-compliant residential schemes; tenure mix, design and layout expectations; and guidance for the handover to Registered Providers.

<i>Development Guidance:</i>
<i>Affordable Housing will be required in accordance with Local Plan Policy H4. It is recommended that applicants contact the council to discuss this provision at an early stage.</i>

<sup>5</sup> Market Housing Mix: Crawley Borough Council and Horsham District Council (November 2016) Chilmark Consulting Ltd

<sup>6</sup> Market Housing Mix: Crawley Borough Council and Horsham District Council (November 2016) Chilmark Consulting Ltd

<sup>7</sup> [Crawley Borough Local Plan, paragraph 6.60 \(2015\) CBC](#)

## Design Quality

In accordance with Local Plan **Policies CH1: Neighbourhood Principle, CH2: Principles of Good Urban Design, CH3: Normal Requirements of All New Development and CH4: Comprehensive Development and Efficient Use of Land**, the development should seek to respond to the following general design principles set out in the Development Guidance below.

### Development Guidance:

- *Integrate the development seamlessly into the existing neighbourhood.*
- *Consider the site in context and respect the predominantly two-storey character of the surrounding residential area.*
- *The layout, massing and height of the development must not cause significant harm to the visual amenity of the surrounding area and should seek to mitigate against the visual impact of the development on existing residents, recognising the variances in existing plot sizes and garden lengths in this location.*
- *Balance the need to avoid overdevelopment and cramming of dwellings on the site with the aim of maximising the potential quantum of units through careful design and layout of the development.*
- *The council's internal and external space standards should be complied with.*

## Transport and Access

In accordance with Local Plan **Policies CH2: Principles of Good Urban Design, CH3: Normal Requirements of All New Development, IN1: Infrastructure Provision, IN3: Development and Requirements for Sustainable Transport and IN4: Car and Cycle Parking Standards**, access to the site must provide good connectivity to the surrounding area and should be designed to maximise highway safety. Access to the site is likely to be achievable through Waterfall Crescent, part of the recently completed development immediately to the north of the site. However, the advice and approval of West Sussex County Council will be required to determine this in advance of the detailed planning stage.

### Development Guidance:

- *Ensure measures required to create vehicular access enhance safety and minimise harm to the visual quality and residential amenity of the existing residential streets.*
- *Achieve a safe, secure, pedestrian and cycle friendly environment which meets highway safety standards and meeting Secure by Design principles.*
- *Take a permeable approach providing good links through the development and beyond. Of particular note is the need to provide pedestrian access immediately to and from the west of the subject site towards the playing fields/pavilion and also the bridge to Buchan Country Park, rather than residents having to exit onto Breezehurst Drive and walk around.*
- *Consider construction of an eastern incline to the footbridge to enhance permeability between the site and Buchan Country Park. Access is currently via a slope from the west to the footbridge.*
- *Seek to effectively integrate parking provision into the scheme layout, providing sufficient spaces for residents, visitors, and users of the sports facilities. Parking provision should be in line with adopted parking standards which are provided within the Urban Design SPD.*

## Open Space and Landscape Setting

The design and layout of a proposed development scheme for this site must protect and enhance the character of its setting, in accordance with Local Plan **Policies CH3: Normal Requirements of All New Development, CH7: Structural Landscaping, CH8: Important Views** and **ENV1: Green Infrastructure**.

### Development Guidance:

- *Maximise opportunities to integrate the open space into the overall development layout and green infrastructure network ensuring the development does not 'turn its back' on access to and views of open space. Active frontages overlooking the wider open space provision are required and will ensure natural surveillance enhancing both visual amenity and security.*
- *Integrate sports provision with informal amenity space and surface water drainage features to create an attractive and functional green infrastructure network for the site for the benefit of new residents and the local community.*
- *Retain the structural landscaping as it provides attractive visual screening to the road from the site and an important contribution to the character of the town.*

## Environmental Sustainability

The development should address climate change by pursuing the objectives set out in **Policy ENV6: Sustainable Design and Construction**. These should be pursued in accordance with the following 'energy hierarchy', set out in the Development Guidance below.

### Development Guidance:

#### **1. Be lean: reduce demand for energy.**

*Appropriate techniques could include:*

- *Specification of advanced standards of fabric energy efficiency (e.g. insulation);*
- *Orienting building surfaces with extensive fenestration (e.g. rear elevations) in a southerly direction to permit solar gain during winter;*
- *Use of shading, passive ventilation, thermal mass, and reflective or light-coloured materials to reduce overheating risk and associated demand for mechanical cooling and ventilation.*

#### **2. Be clean: ensure efficiency in the supply of energy.**

*The development should explore opportunities to use locally generated energy or on-site generation in order to achieve greater efficiency of energy supply*

#### **3. Be green: use renewable and low or zero carbon energy sources.**

*A range of possible low or zero carbon technologies are identified in the adopted Planning and Climate Change SPD. The operational requirements of Gatwick Airport will need to be taken into account when considering these options, and the SPD further identifies the nature of these constraints and the circumstances in which early consultation with Gatwick Airport should occur.*

The development will also be expected to address Crawley's water stress, in accordance with **Policy ENV9: Tackling Water Stress**.

### Development Guidance:

*New dwellings will be expected to comply with the tighter 'optional' Building Regulations water efficiency requirement of 110 litres per person per day, unless this can be shown to be unviable or unfeasible.*

## Environmental Protection

To manage the impacts of environmental pollution and flooding from the development, proposals for the site should consider the requirements of Local Plan **Policies ENV8: *Development and Flood Risk*, ENV10: *Pollution Management and Land Contamination*, ENV11: *Development and Noise* and ENV12: *Air Quality*.**

### Development Guidance:

- Any knock on effects on drainage issues should be addressed at the pre-design/outline stage rather than retro-fitted to suit a pre-conceived site layout.
- Seek to mitigate against noise and air quality through effective design layout in the first instance with additional mitigation measures as required to reduce to acceptable levels.

### Key Local Plan policies and relevant documents

- |   |  |
|---|--|
| ▶ <b>Policy H1:</b> <i>Housing Provision</i>                                    | ▶ <b>Policy ENV7:</b> <i>District Energy Network</i>                               |
| ▶ <b>Policy H2:</b> <i>Key Housing Sites</i>                                    | ▶ <b>Policy ENV8:</b> <i>Development and Flood Risk</i>                            |
| ▶ <b>Policy H3:</b> <i>Future Housing Mix</i>                                   | ▶ <b>Policy ENV9:</b> <i>Tackling Water Stress</i>                                 |
| ▶ <b>Policy H4:</b> <i>Affordable and Low Cost Housing</i>                      | ▶ <b>Policy ENV10:</b> <i>Pollution Management and Land Contamination</i>          |
| ▶ <b>Policy SD1:</b> <i>Presumption in Favour of Sustainable Development</i>    | ▶ <b>Policy ENV11:</b> <i>Development and Noise</i>                                |
| ▶ <b>Policy CH1:</b> <i>Neighbourhood Principle</i>                             | ▶ <b>Policy ENV12:</b> <i>Air Quality</i>  |
| ▶ <b>Policy CH2:</b> <i>Principles of Good Urban Design</i>                     | ▶ <b>Policy IN1:</b> <i>Infrastructure Provision</i>                               |
| ▶ <b>Policy CH3:</b> <i>Normal Requirements of All New Development</i>          | ▶ <b>Policy IN3:</b> <i>Development and Requirements for Sustainable Transport</i> |
| ▶ <b>Policy CH4:</b> <i>Comprehensive Development and Efficient Use of Land</i> | ▶ <b>Policy IN4:</b> <i>Car and Cycle Parking Standards</i>                        |
| ▶ <b>Policy CH5:</b> <i>Standards for All New Dwellings</i>                     | ▶ <a href="#">Urban Design SPD</a>   |
| ▶ <b>Policy CH7:</b> <i>Structural Landscaping</i>                              | ▶ <a href="#">Planning and Climate Change SPD</a>                                  |
| ▶ <b>Policy CH8:</b> <i>Important Views</i>                                     | ▶ <a href="#">Green Infrastructure SPD</a>   |
| ▶ <b>Policy ENV1:</b> <i>Green Infrastructure</i>                               | ▶ <a href="#">Affordable Housing SPD</a>   |
| ▶ <b>Policy ENV6:</b> <i>Sustainable Design and Construction</i>                |  |

## 4. Development Principle 2: Open Space Provision

### Principle 2:

**Development of this site will balance the loss of open space, and increased population, with new and enhanced provision of open space that better meets the needs of the community.**

An open space assessment of this site was undertaken in preparation of the Local Plan<sup>8</sup> and informed the justification for loss of open space and specific requirements for open space provision as part of the Breezehurst Drive allocation. Therefore, a new assessment, normally expected under **Policy ENV4: Open Space, Sport and Recreation**, is not required, subject to the timely delivery<sup>9</sup> of a final scheme compliant with **Policy H2: Key Housing Sites**.

Specific new and enhanced open space elements are required to ensure the loss of open space, and increased population, resulting from the development is balanced by new and enhanced provision of open space that better meets the needs of the community. **Policy H2: Key Housing Sites** sets the following criteria for the Breezehurst Drive allocation:

- the retention of good quality pitch provision to the south of the pavilion;
- provision of enhanced pitch drainage off-site; and,
- new or retained provision of changing facilities to be directed towards Skelmersdale Walk Playing Fields or other suitably located provision to meet future fluctuations in demand for pitch sports.
- Consideration should also be given to the provision of allotments off-site should demand from residents exist.

### Retention of pitch provision to the south of the pavilion

Policy H2 requires retention of the pitch immediately south of the pavilion which leaves the remaining area of the allocation for housing and provision of other open space that is needed.

#### Development Guidance:

*The pitch area to the south of the pavilion is rated as excellent quality in the Playing Pitch Strategy but should be tested in accordance with Sport England guidance<sup>10</sup> and improved if necessary to ensure it is at a standard to enable its full use.*

*Other requirements associated with pitch provision include:*

- *Following FA guidance to provide sufficient space for a full size senior pitch (106m x 70m) including 3m run-off margins around the edges of the pitches and other specifications to meet FA standards for community/club football<sup>11</sup>. This space can also be used for other pitch configurations to meet the needs of different age groups but the housing should not encroach on the ability of the site to cater for use of a full size adult pitch.*

<sup>8</sup> [LP115 Open Space, Sport and Recreation Study 2014 – 2030 \(2013\) JPC Strategic Planning and Leisure Limited](#)

<sup>9</sup> Annual Monitoring, published through the council's [Authority's Monitoring Report](#), will ensure the Local Plan policy remains up-to-date.

<sup>10</sup> [Natural Turf for Sport, Sport England, 2011](#)

<sup>11</sup> The FA Guide to Pitch and Goalpost Dimensions, 2012



- *Sufficient parking spaces. The standards set out in the Urban Design SPD<sup>12</sup> applied to the playing fields show a need for 45 spaces. As there are currently 32 spaces these should be retained.*
- *A good standard of amenity for existing and new residents with respect to noise, floodlighting, access, and parking.*
- *Relocating the existing ball stop netting (if fit-for-purpose) or re-providing, if necessary, to prevent stray balls hitting housing or landing in gardens.*

### **Provision of enhanced pitch drainage off-site**

This is required to mitigate the loss of open space by improve playing capacity elsewhere. Bewbush neighbourhood has two other areas with pitches laid out: The Green and Bewbush West. Skelmersdale Walk playing fields are adjacent to the allocation site but have not been used for formal pitch sports for a number of years. They all suffer from poor drainage to varying degrees<sup>13</sup> which limits how often they can be used.

The most effective way of enhancing pitch drainage to gain increased playing capacity for the most number of sports clubs is a contribution towards decompaction and enhanced agronomic maintenance of sports pitches. This includes a combination of fraise mowing, compaction alleviation (verti-draining), weed control, fertiliser, over seeding and sand dressing.

Site investigations would be necessary to confirm whether this type of drainage is suitable for Crawley's pitches. If it is the council will seek a one-off S106 contribution up to £70,000 for secondary drainage enhancements, to be used on the capital purchase of equipment necessary to carry out secondary drainage on sport pitches and a 15 year commuted sum of approx. £10,500 per annum<sup>14</sup> to maintain their effectiveness.

#### *Development Guidance:*

*Development proposals must include mitigation measures to address the loss of the open space on site by improving playing capacity elsewhere.*

*An agronomist should be used to specify the required works and equipment needed to ensure pitch capacity is increased to a sufficient standard. The mitigation measures must be agreed with the council.*

*The impact of improved drainage of pitches on run-off rates will need to be assessed. Increased run off rates would necessitate the need for additional storage to avoid any knock on effects downstream.*

### **3G pitch provision**

There is an identified need in Crawley for additional artificial pitch provision for multi-sport use<sup>15</sup>. Whilst not a requirement of this allocation, it should be noted that Breezehurst Drive Playing Fields may, in principle, be considered suitable for this provision. However, detailed design would need to confirm suitability primarily in terms of space and its proximity to neighbouring housing.

<sup>12</sup> Urban Design Supplementary Planning Document (October 2016) CBC: [Urban Design SPD](#)

<sup>13</sup> [LP115 Open Space, Sport and Recreation Study 2014 – 2030, pages 68/69, \(2013\) JPC Strategic Planning and Leisure Limited](#)

<sup>14</sup> Typical maintenance cost per pitch per year according to [Sport England Guidance](#).

<sup>15</sup> [LP116 A Playing Pitch Study for Crawley](#) page 88, (2013) JPC Strategic Planning and Leisure Limited



## **Breezehurst Community Pavilion and new or retained provision of changing facilities**

Changing facilities are required to support the use of the pitch(es), by either retaining the existing changing facilities at the pavilion, or provision of new changing facilities close to the pitch(es) and parking area.

The pavilion is not part of the allocation site and so there is no Local Plan requirement to alter the building or change its use. The allocation site may proceed independently of any proposal for the pavilion but if it were to be included by a developer the guidance below sets out the planning policy context/position. This guidance would also be relevant to a stand-alone application for change of use of the Pavilion.

*Change of Use of Pavilion:* The pavilion was opened in 2009 as a changing facility/social venue to meet the requirements of Central Bewbush SPD 2007. It was envisaged that a higher level league team would use the facilities and the pitches to the south of the pavilion. Crawley Town FC made use of the pavilion for a few years but then moved elsewhere leaving the facilities without a tenant. The council were unable to secure further use of the facilities to make it financially viable and subsequently the pavilion was mothballed in 2013 to save on running costs.

An application a change of use would usually require planning permission. A key policy requirement would be justification against Paragraph 74 of the NPPF and Policy ENV4 of the Crawley Local Plan which deal with proposals that remove or affect existing open space, sport and recreational space. This includes facilities associated with sports pitches such as pavilions/changing rooms.

The first criterion of these policies, whereby such a change of use would be acceptable, would be through an assessment of the needs for open space, sport and recreation show whether its existing use is surplus to requirements.

The 2013 Crawley Open Space Sport and Recreation Study was undertaken to determine the current and future needs for open space across the borough in Crawley for the duration of the Local Plan. One of the main focuses of the study was an assessment of sports pitches and their associated facilities. In Bewbush, the study found that there was potential to rationalise provision of sports pitches in return for improving the quality of retained provision. Through the Local Plan Examination, it was found that, whilst rationalisation of some sports space was acceptable at Breezehurst Drive, it did not show the pavilion or pitch immediately to the south as surplus to requirements. This is reflected in Policy H2 which specifies retention of the pitch and changing facilities.

Surveys and interviews undertaken for the 2013 Playing Fields Study found that the trend for junior pitches is upwards with the number of youth teams continuing to grow. In May 2017, eight Crawley football clubs were contacted that include youth teams to establish whether there is demand for the pitches and pavilion at Breezehurst. The eight clubs were approached to discuss an opportunity to use Breezehurst Drive playing fields and changing rooms. Out of the eight clubs, three confirmed they would use the Breezehurst site with changing rooms to meet the club's growing needs dependent on cost and drainage improvements at Skelmersdale Walk Playing Fields. These were Three Bridges FC, Crawley Wasps and Crawley Utd.

As the council has an up-to-date borough-wide study of open space and sports pitches (scrutinized through the Local Plan Examination) and demand from sports clubs to use the site, it is unlikely that a new assessment of open space would show that that changing facilities (the main part of the pavilion) are not needed in this location.

To overcome previous issues with the viability of running costs of the pavilion, there may be justification to change to another use and re-provide changing rooms nearby in a different

format. This type of re-provision would need to be evidenced otherwise the proposal would not meet the second criterion of Policy ENV4, that the loss resulting from the proposed development should be replaced by *equivalent or better provision in terms of quantity and quality in a suitable location*<sup>16</sup>. Information would need to be submitted so that Sport England and the Planning Authority can consider whether the current format of the Pavilion is unviable. For example, the rates the pavilion was being offered at, how long it marketed for before it was 'mothballed' and how was it being marketed.

## Allotments

Policy H2 states that '*Consideration should also be given to the provision of allotments off-site should demand from residents exist*'.

The Open Space, Sport and Recreation Study 2013 shows that there is a 0.6 hectare undersupply of allotment space in the Bewbush neighbourhood and also a gap in access to those living on the western side of the neighbourhood who live beyond the reasonable walking distance to the closest allotments.

The closest allotments to the allocation site are Cuckfield Close which has 29 plots, all rented, with 22 people on the waiting list. Ellman Road a little further away has 14 plots, all rented, with 16 people on the waiting list. 6 residents are on both waiting lists. In recent years, residents are on the waiting list for approximately 3 years before a plot becomes available. On other waiting lists, actual take up is between 25%-40%, although this could be affected by the waiting time. Appendix D shows the approximate locations of those on the waiting list as of November 2016. It should also be noted that this is influenced by the locations of existing allotments. There may be greater demand from residents who live on the western side of Bewbush who would like a plot but have not requested one due to the walking distance or lack of parking.

The development itself will increase the population and, therefore, exacerbate this demand for allotments, particularly if flatted development is a part of the housing provision. The Crawley Open Space, Sport and Recreation Study found that:

- 50% of respondents to a borough wide survey highlighted a shortage of allotments
- Bewbush neighbourhood has a 0.65ha undersupply of allotment space by 2030 (which includes the allocation) with a current shortfall of 0.60ha undersupply of allotment
- There is a need for an additional allotment in Bewbush – ideally located in the west of the neighbourhood.
- There is surplus provision of amenity green space and this may provide an opportunity for alternative uses.

**Development Guidance:**

*As there is clearly demand for additional allotment provision in Bewbush, on-site provision or off-site provision in a suitable location would meet the policy requirement. The location of this provision should be agreed with the council.*

The number of plots to be provided should meet the demand from the development itself and the existing demand in the local area. The Crawley Open Space Study shows an undersupply of 0.65ha allotment space based on the existing population and planned development to 2030. New provision should therefore be at least 0.65ha which is a similar size to the allotment at Knepp Close in Pound Hill.

<sup>16</sup> [Crawley Borough Local Plan, Policy ENV4 \(December 2015\) CBC](#)

Development Guidance:

*The allotment site should be of at least 0.65ha in size.*

*It should provide for varying plot sizes, have good access, parking, security and facilities such as water supply, toilets and well-drained soil.*

Consideration should be given to the reuse of wood or other materials for allotment demarcations, incorporation of water saving/water harvesting mechanisms, and wind and solar energy units.

**Key Local Plan policies and relevant documents**

- ▶ **Policy H2:** *Key Housing Sites*
- ▶ **Policy ENV4:** *Open Space, Sport and Recreation*
- ▶ **Policy ENV5:** *Provision of Open Space and Recreational Facilities*
- ▶ **Green Infrastructure SPD**
- ▶ **Crawley Borough Council Open Space Sport and Recreation Study (2013)**
- ▶ **Crawley Borough Council Playing Pitch Study (2013)**
- ▶ [FA Technical Standards](#)

## 5. Development Principle 3: Green Infrastructure

### Principle 3:

**Green Infrastructure must be fully integrated into the development, to ensure it functions successfully and creates well-designed, safe and visible links between the neighbourhood and green spaces.**

### Green Infrastructure approach

As an existing greenfield site, the site at Breezehurst Drive forms part of the green infrastructure network of the borough. Policy ENV1: *Green Infrastructure* seeks to conserve and enhance Crawley's green infrastructure network. In relation to new development, proposals should:

- take a positive approach to designing green infrastructure, utilising the advice in the council's supplementary planning documents to integrate and enhance the green infrastructure network; and
- maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting to the urban/rural fringe and the wider countryside beyond.
- Large proposals are required to provide new and/or create links to green infrastructure, where possible.

#### Development Guidance:

*The provision of green infrastructure should be considered carefully as part of the early design of the scheme to ensure it is fully integrated into the development proposal, functions successfully, and offers well-designed, safe and visible links between the neighbourhood and green spaces.*

### Multi-functionality and providing opportunities for walking/cycling

Multi-functionality of the individual green spaces provided as part of this development, as places for biodiversity, formal and informal recreation, and visual amenity, should be maximised throughout the design.

Drainage, mitigating climate change, providing access and retention of green infrastructure features such as structural landscaping and hedgerows are all further opportunities which should be explored through considering the site's role within the green infrastructure network for the borough.

#### Development Guidance:

*Particular attention should be given to creating pedestrian links from the housing to the green infrastructure to west. For example, a hard and soft landscaped link from the north of the site running along to and behind the pavilion would allow residents to access the playing fields and green corridor to the north and facilities in that area.*

*Access to the countryside is also important and a link designed into the scheme to the bridge over into Buchan Country Park would help meet the requirements of Policy ENV1 and Policy CH11: Rights of Way and Access to the Countryside.*

## Trees and hedgerows

Existing trees have the potential to significantly contribute to the site's character and provide a sense of early maturity for a new development. The trees adjacent to the western boundary and within/adjacent to the southern edges of the site are designated by the Local Plan under **Policy CH7: Structural Landscaping**. The design and layout of proposals should protect and enhance the soft landscaping and its valuable function as visual amenity and buffer to the Horsham Road.

Development Guidance:

*Landscaping and planting will need to preserve and enhance the site's structural landscaping role. Development proposals should demonstrate the visual impact of the proposals.*

Tree retention and protection on site is established in **Policy CH6: Tree Planting and Replacement**. The policy provides tree replacement planting standards where trees need to be removed as part of a new development and also require provision of one new tree for each new dwelling, of an appropriate species and planted in an appropriate location.

Development Guidance:

*A tree/hedgerow survey should be carried out, along with a draft tree retention/ removal plan, if necessary, to establish the location and health of all major trees on the site helping inform pre-application discussions.*

*Development should be well defined by means of appropriate additional planting of trees and hedgerows. Native species should be prioritised.*

*At least one new tree of appropriate species will need to be planted for each new dwelling in an appropriate location, and any trees that must be removed, replaced in accordance with Policy CH6 of the Crawley Borough Local Plan.*

The Green Infrastructure Map identifies a band of trees that could be ecologically important on the southern and western edge of the site where it runs alongside Dousters Brook. This corridor of green infrastructure links to the wider green infrastructure network to the north where it meets Ifield Mill Pond.

More detailed guidance in relation to trees and ecological surveys is provided in the Green Infrastructure SPD.

Development Guidance:

*An ecological assessment of the trees/hedgerow on the southern and western edge of the site should be undertaken to inform the layout and design of the development ensuring proposals avoid harm and meet **Policy ENV2: Biodiversity** and the accompanying Green Infrastructure SPD.*

## Dousters Brook

Dousters Brook is a small stream that is classed as a Habitat of Principal Importance under S41 of the NERC Act 2006. In line with Policy ENV2, the proposals should conserve and enhance biodiversity, where possible, to ensure a net gain for biodiversity.

Development Guidance:

*A habitat survey will be required to accompany an application due to the proximity (5 metres) of Dousters Brook to the site.*

*A minimum buffer of 10 metres to the brook including habitat creation such as wild flower meadow habitat, suitable for stream side locations is one way of achieving this net gain.*

*Issues such as light spill and disturbance to habitat should be avoided.*

### Site of Special Scientific Interest

Buchan Hill Ponds, a Site of Special Scientific Interest, lies very close to the site but is separated by the A264 Horsham Road. The reason for designation is the three ponds, which are the best example in West Sussex of Wealden hammer ponds on acid Tunbridge Wells sands. A nationally uncommon woodland type occupies the wetlands around the ponds and the site supports a rich dragonfly fauna which includes two particularly notable species. The proposed development (during construction and occupation) should not impact on the air quality and water quality of the SSSI which are crucial to the successful conservation of the site.

Natural England have developed a mapping tool showing Impact Risk Zones for SSSIs. The Breezehurst site lies within an area where, if 50+ dwellings are proposed, Natural England should be consulted.

*Development Guidance:*

*To ensure impacts on the SSSI are fully taken into account, Natural England should be consulted on any proposals for development of this site.*

#### Key Local Plan policies and relevant documents

- ▶ **Policy H2:** *Key Housing Sites*
- ▶ **Policy ENV1:** *Green Infrastructure*
- ▶ **Policy ENV2:** *Biodiversity*
- ▶ **Policy CH3:** *Normal Requirements of All New Development*
- ▶ **Policy CH6:** *Tree Planting & Replacement*
- ▶ **Policy CH7:** *Structural Landscaping*
- ▶ **Policy CH11:** *Rights of Way and Access to the Countryside*
- ▶ **Green Infrastructure SPD**
- ▶ **Forestry Commission Guidance**
- ▶ **Natural England Standing Advice**



## 6. Application Requirements

In addition to the above development principles, an application for planning permission at this site will also need to address:

### Flood Risk and Sustainable Drainage

As the site is over 1 hectare a Flood Risk Assessment (FRA) should be prepared in order to support any development at this location, in accordance with Local Plan **Policy ENV8: Development and Flood Risk**. The main focus of the FRA will be the attenuation of surface water, as the site is shown to be entirely situated within Flood Zone 1. The FRA should also demonstrate that the flood risk elsewhere would not be increased as a result of the proposal.

A Sustainable Drainage System (SuDS) will be required to be established as part of the overall design layout for the site to enable effective drainage of surface water. The SuDS Management Train Concept should be used in the development of the SuDS and include ecological features to create habitat and landscape opportunities where possible.

The layout needs to consider SuDS at a pre-design/outline stage to ensure that space is made for water and not retro-fitted to suit a preconceived site layout. It should be noted that the most up to date figure on climate change should be used when calculating the runoff rate, and therefore associated storage, required for a suitable surface water design.

*A Flood Risk Assessment will need to accompany an application for planning permission. The assessment must:*

- *Demonstrate how surface water drainage from the site will be addressed;*
- *Demonstrate how mitigation measures will be implemented to make risk acceptable on-site and not increased elsewhere.*

*In order to reduce peak surface water run-off rates and annual volumes of run-off for development, the use of SuDS should be considered.*

*The surface water run-off rates must not exceed the greenfield levels, and should seek to improve on these.*

### Dousters Brook

Development should be kept as far back from the top of the bank of the Douster Brook as possible. It is highly likely that any works in, over, under or within 8 metres of the bank of the Douster Brook will require a prior Flood Risk Activity Permit under the Flood Risk Regulations. With the requirement to retain the southern playing field development is likely to be located 100+ meters from the Douster Brook.

Therefore, any works which consider crossing the watercourse or in close proximity to the watercourse are likely to require the Environment Agency's prior permission. The Environment Agency should be approached at the earliest opportunity should any works which may affect the watercourse be proposed.

### Water Stress

The borough is located in an area of serious water stress and as such development is expected to address this issue by achieving a better than standard level<sup>17</sup>. **Local Plan Policy ENV9: Tackling Water Stress** requires development to “*plan positively to minimise its impact on water resources and promote water efficiency*” and “*New dwellings should where viable and*

<sup>17</sup> Water Stressed Areas – Final Classification (July 2013) Environment Agency

*technically feasible, meet the Building Regulations optional requirement for tighter water efficiency”.*

How the applicant is meeting these requirements should be included in their Sustainability Assessment as required by **Policy ENV6: Sustainable Design and Construction**. Further guidance in preparing Sustainability Assessments is provided in the **Planning and Climate Change SPD**<sup>18</sup>.

*A Sustainability Assessment will need to accompany an application for planning permission.*

### **Utilities and Drainage**

In accordance with Local Plan **Policy IN1: Infrastructure Provision**, a utilities assessment and drainage assessment should be prepared and submitted as part of the planning application and will need to prove that the development can connect into and be served by the relevant utilities providers.

This requirement includes electricity, gas, fibre optic broadband, potable water, foul drainage, and surface water drainage.

Given the size of the proposed development, it is likely that upgrades will be required to the local sewerage network and these should be addressed as early as possible. It is strongly recommended that developers engage with Thames Water, as the wastewater infrastructure providers, at the earliest opportunity to establish:

- The development’s demand for wastewater/sewage treatment and network infrastructure, both on and off site, and whether it can be met; and
- The surface water drainage requirements and flood risk of the development, both on and off site, and whether it can be met.

### **Social Infrastructure**

Social infrastructure in the provision of education, healthcare, community and library, and emergency services will be provided as part of commuted sums collected through the Community Infrastructure Levy<sup>19</sup>.

### **Highways and Access**

In line with **Policy IN3: Development & Requirements for Sustainable Transport**, a Transport Statement will be required to assess the impact of the development on the surrounding and wider road network including public transport routes and the cycling and walking network. The scope of the Transport Statement should be agreed with WSCC and Highways England at the pre-application discussion stage but should include detailed traffic modelling to understand the impact on the highway network in combination with other planned development.

Access to the site is likely to be achievable through Waterfall Crescent, part of the recently completed development immediately north of the site. The access points and detailed design of the access routes should be discussed and approved by West Sussex County Council at an early stage to ensure safe and efficient access to the site for both new and existing residents, and should protect the residential amenity of existing residents, as far as possible. A Road Safety Audit will also be required.

<sup>18</sup> Planning and Climate Change Supplementary Planning Document (October 2016) CBC: [Planning and Climate Change SPD](#)

<sup>19</sup> Crawley CIL Charging Schedule (2016) CBC: [www.crawley.gov.uk/CIL](http://www.crawley.gov.uk/CIL)

In accordance with Local Plan **Policy IN4: Car and Cycle Parking Standards**, provision must be in line with the parking standards set out in the **Urban Design SPD**<sup>20</sup>.

*A Transport Statement will need to accompany an application for planning permission.  
A Road Safety Audit: Stage 1 will need to be submitted with an application for planning permission.*

## Noise

Any residential development is a noise sensitive use and this issue is relevant at this site because of its location close to a dual carriageway. **Local Plan Policy EN11: Development and Noise** and the **Noise Annex**<sup>21</sup> of the Local Plan provide more information on how transport noise affects development. An assessment of any noise should be undertaken and effective master planning and incorporation of noise mitigation measures undertaken if noise levels are noticeable and intrusive. If noise attenuation measures are needed, they should not compromise the visual amenity value of the structural landscaping along the dual carriageway road frontage. It is important that the issue of noise shapes the layout and design of the site first and foremost before focusing on mitigations to buildings such as noise insulation.

Further advice can be found in [LP106 Planning Noise Advice Document: Sussex](#).

## Air Quality and Emissions Mitigation Assessment

In line with Local Plan Policy **ENV12: Air Quality** and supporting guidance set out in **Air Quality and Emissions Mitigation Guidance for Sussex**, an assessment of the air quality impacts from the planned development and an emissions mitigation assessment will be required to analyse the impact of the proposed residential development on air quality.

As the development is alongside a busy road, the air quality assessment should look at the impact from traffic sources on the proposed development, as well the predicted impacts from a development *itself* (including cumulative effects) on local air quality and how these may affect public health and/or the local environment.

The emissions mitigation assessment should be used to work out the appropriate level of mitigation required. This should then form the basis of a mitigation statement/strategy to help ensure air quality is not materially worsened, and is where possible improved.

## Long Distance View Splay

A small area in the south east corner of the site lies within the long distance view splay from Gossops Drive towards Target Hill which is identified in Local Plan **Policy CH8: Important Views**. In line with this policy, the visual impact of development in this area should be demonstrated as part of the planning application, for example through a verified view montage.

## Community Consultation

In line with Crawley Borough Council's Statement of Community Involvement<sup>22</sup>, applicants are required to undertake community consultation in advance of submission of a planning

<sup>20</sup> Urban Design Supplementary Planning Document, Annex 1 Crawley Borough Parking Standards, pages 67-74 (October 2016) CBC: [Urban Design SPD](#)

<sup>21</sup> Crawley 2030: Crawley Borough Local Plan 2015-2030, Noise Annex, Pages 153-163 (December 2015) CBC: [Crawley 2030: Crawley Borough Local Plan 2015 – 2030](#)

<sup>22</sup> Crawley Borough Council Statement of Community Involvement (February 2017) CBC: [www.crawley.gov.uk/sci](http://www.crawley.gov.uk/sci)

application. The scope and extent of the consultation exercise should be discussed at early pre-application stage.

In addition to community consultation, targeted discussions should be held with the following key stakeholders:

- relevant officers within the council, particularly environmental health, affordable housing, amenity services, drainage; and
- statutory consultees such as WSCC Highways, Highways England, WSCC Lead Flood Authority, Sport England, Natural England, Environment Agency, and relevant utility providers.

Applicants are advised to discuss proposals and information to be submitted at an early stage through formal pre-application meetings with the Development Management Team.

### **Developer Contributions and Community Infrastructure Levy (CIL)**

Crawley Borough Council has recently introduced a Community Infrastructure Levy (CIL) for the borough which places a charge on appropriate development for any planning permission granted. This includes market housing with affordable housing eligible for CIL exemption.

The council's dedicated CIL webpage provides the most up-to-date information on the CIL Charging Schedule and implementation of CIL in Crawley: [www.crawley.gov.uk/CIL](http://www.crawley.gov.uk/CIL)

A Section 106 Agreement will also be required and will address relevant site specific issues to mitigate impacts on infrastructure that are not covered by CIL. Discussions and negotiations regarding S106 provision should be undertaken at pre-application stage. The expected level of contribution towards off-site open space enhancements are set out within the Development Principle 2: Open Space Provision section.

S106 requirements at Breezehurst Drive are likely to include:

- Affordable housing;
- Delivery of open space enhancements
- Provision of allotments and associated infrastructure;
- Provision and management of green infrastructure;
- Tree planting (if full provision/replacement cannot be made on site);
- Provision of appropriate access arrangements; and
- Other on-site requirements necessary to make the development acceptable in planning terms.

#### **Key Local Plan policies and relevant documents**

- ▶ **Policy H2: Key Housing Sites**
- ▶ **Policy ENV6: Sustainable Design & Construction**
- ▶ **Policy ENV8: Development and Flood Risk**
- ▶ **Policy ENV9: Tackling Water Stress**
- ▶ **Policy ENV10: Pollution Management and Land Contamination**
- ▶ **Policy ENV11: Development & Noise**
- ▶ **Policy ENV12: Air Quality**
- ▶ **Policy IN1: Infrastructure Provision**
- ▶ **Policy IN3: Development & Requirements for Sustainable Transport**
- ▶ **Policy IN4: Car and Cycle Parking Standards**
- ▶ **Planning and Climate Change SPD**
- ▶ **Urban Design SPD**
- ▶ **Planning Noise Advice Document: Sussex (July 2015)**
- ▶ **Local Plan Noise Annex**

The planning application should be accompanied by a construction management plan, setting out, for example, hours of activity and access routes. This will be a requirement through a planning condition.

### Development Requirements Checklist

<b>Design and Access Statement</b>	<input type="checkbox"/>
<b>Flood Risk Assessment and Sustainable Drainage Plan</b>	<input type="checkbox"/>
<b>Sustainability Statement</b>	<input type="checkbox"/>
<b>Utilities Assessment and Drainage Assessment</b>	<input type="checkbox"/>
<b>Transport Statement</b>	<input type="checkbox"/>
<b>Road Safety Audit: Stage 1</b>	<input type="checkbox"/>
<b>Noise Impact Assessment</b>	<input type="checkbox"/>
<b>Air Quality Impact Assessment</b>	<input type="checkbox"/>
<b>Accurate Visual Assessment/Representations</b>	<input type="checkbox"/>
<b>Tree Survey</b>	<input type="checkbox"/>
<b>Tree Retention Plan</b>	<input type="checkbox"/>
<b>Arboricultural Impact Assessment</b>	<input type="checkbox"/>
<b>Affordable Housing Scheme</b>	<input type="checkbox"/>
<b>Section 106 Agreement (draft)</b>	<input type="checkbox"/>
<b>Community Infrastructure Levy</b>	<input type="checkbox"/>
<b>Flood Activity Permit</b>	<input type="checkbox"/>

## APPENDIX A: INSPECTOR'S FINAL REPORTS EXTRACTS

### Report on the Examination into Crawley Borough Local Plan 2015-2030 Inspector's Final Report to Crawley Borough Council (2 November 2015) Inspector Martin Pike

#### Breezehurst Drive, Bewbush

For Bewbush the PPS indicates that sports pitch provision currently exceeds the quantitative capacity required, though many of the pitches are not of good quality. The extensive playing fields at Breezehurst Drive and Skelmersdale Walk have not been used for the past couple of seasons; whilst the majority of the playing surface is classified as poor quality, it is surprising that the playing field identified as 'excellent' is not currently used despite being available. Based on Sport England's current approach to pitch assessments of "what do we need and when", the evidence suggests that there is no current or potential future demand for this entire area being retained as playing fields. Moreover, the Open Space Study indicates that there is a quantitative surplus of open space in Bewbush, with only two typologies (allotments and youth play space) being deficient.

The PPS does not oppose development at Breezehurst Drive but recommends that the loss of open space is mitigated by improvements to retained sites in the neighbourhood. This seems a sensible conclusion and one that would comply with the NPPF. The argument that quantitative minimum standards should always be adhered to does not take into account the fact that better quality provision can increase the capacity of facilities and lead to greater participation. As with the Tinsley Lane site, the Council accepts that policy H2 and the text should be expanded to specify the recreation improvements that should be delivered in association with the housing development; again these form part of **MM33** and **MM34**.



APPENDIX B: Bewbush Allotments Waiting List (November 2016)

