Crawley Local Plan

Crawley Borough Submission Local Plan 2024 Topic Paper 4:

Housing Supply

Crawley Borough Council

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1. Introduction

1.1 This Topic Paper is part of the evidence base for the Crawley Borough Local Plan 2024 – 2040[1]. It provides a summary of the technical information supporting the council's approach to Housing Delivery which is detailed in the submission Local Plan policies:

- H1: Housing Provision
- H2: Key Housing Sites
- H3: Housing Typologies (and sub-policies H3a-f)
- TC3: Development Sites within the Town Centre Boundary

1.2 Other policies in the Plan directly influence the housing land supply, the extent to which these have led to the approach taken by the Local Plan is explained in this Topic Paper. These include:

- CL2: Making Successful Places – Principles of Good Urban Design
- CL3: Movement Patterns, Layout and Sustainable Urban Design
- CL4: Compact Development – Layout, Scale and Appearance
- CL5: Development Briefs and Masterplanning
- DD3: Standards for All New Dwellings (including conversions)
- OS1: Open Space, Sport and Recreation
- EC1: Sustainable Economic Growth
- EC2: Economic Growth in Main Employment Areas
- TC1: Primary Shopping Area

1.3 It is supported by the Sustainability Appraisal[2].

2. Background

2.1 Crawley Borough Local Plan 2015

2.1.1 The Crawley Borough Local Plan was adopted in December 2015. It includes the following policies which concern or closely influence the supply of housing:

- SD1: Presumption in Favour of Sustainable Development (predecessor to Policy SD1 of the Submission Local Plan 2024-2040)
- CH1: Neighbourhood Principle (predecessor to CL1)
- CH4: Comprehensive Development and Efficient Use of Land (Policies CL3 and CL4 of the Submission Local Plan 2024-2040 expand on the intentions of this policy)
- EC1: Sustainable Economic Growth (predecessor to EC1)
- EC2: Economic Growth in Main Employment Areas (predecessor to EC2)
- EC5: Primary Shopping Area (predecessor to TC1)
- EC6: Development Sites within the Town Centre Boundary (predecessor to TC3)
- H1: Housing Provision (predecessor to H1)
- H2: Key Housing Sites (predecessor to H2; also related to Policies H3 and H3a-f of the Submission Local Plan 2024-2040)

[1] Submission Crawley Borough Local Plan (May 2023) CBC: https://crawley.gov.uk/sites/default/files/2023-05/1.%20Submission%20Crawley%20Borough%20Local%20Plan%202024-2040%20May%202023.pdf
[2] Crawley Sustainability Appraisal/Strategic Environmental Assessment (May 2023) CBC: https://crawley.gov.uk/sites/default/files/2023-05/3.%20Sustainability%20Appraisal%20SA.SEA%20Report%20May%202023.pdf

2.1.2 The Local Plan Sustainability Appraisal sets ensuring 'that everyone has the opportunity to live in a decent and affordable home' as a key sustainability objective, and identifies the following monitoring indicators:

- Net additional dwellings – in previous years;
- Net additional pitches (Gypsy and Traveller);
- Supply of ready to develop housing sites (5-year housing land supply);
- New and converted dwellings – on previously developed land (PDL).

2.1.3 The council's Authority Monitoring Reports in the period since the adoption of the Local Plan have monitored the above indicators as well as the following:

- Mix of housing delivered;
- Delivery of affordable housing;
- Progression of Town Centre sites identified in Local Plan Policy EC6.

2.1.4 In broad terms, the approach to housing supply set out in the adopted Local Plan acknowledges and reflects the borough's constrained land supply, resulting from Crawley's tightly-drawn administrative boundaries and the constraints on a significant proportion of the land within them, including safeguarding for an additional southern wide-spaced runway at Gatwick Airport, and the noise constraints arising from current and potential aviation. Within the Built-Up Area Boundary, the Local Plan also seeks to protect some non-residential uses which are key to the borough's economy or which provide necessary infrastructure or leisure services to Crawley's population. In this context, Policy H1 identifies a housing supply of 5,100 dwellings (annualised at 340dpa), amounting to just over half of the objectively assessed need of 10,125. This leaves a remaining unmet need of 5,025 (335dpa), which the council commits to seeking to address through the Duty to Cooperate. Between them, the adopted Horsham District Planning Framework (2015) and Mid Sussex District Plan (2018) currently make provision for this unmet need.

2.1.5 The extent and nature of the land allocated for housing in the adopted Plan Policies H2 and EC6 reflect the constraints identified above. The North East Sector (now Forge Wood), is allocated as a new neighbourhood of 1,900 dwellings (with two further residual sites expected to add another 150), representing the last currently identifiable opportunity of this nature with the borough's current administrative boundaries. Other allocations and broad locations are made up primarily of previously developed land, together with some playing fields or other open space facilities identified as surplus or capable of being re-provided (Tinsley Lane and Breezehurst Drive Playing Fields). A significant proportion of the adopted Local Plan's housing supply is expected to come from the Town Centre, where Policy EC6 provides for a minimum of 499 dwellings to be delivered across four mixed-use 'Key Opportunity Sites'. Additional development is anticipated on further identified Town Centre sites and across the Town Centre more generally as a 'Broad Location'.

2.1.6 As set out in the Housing Trajectory supporting the Local Plan, the identified housing supply was anticipated to come forward mainly in the early years of the Local Plan period, before tailing off in later years to a baseline windfall allowance of 55 dwellings per annum.

2.2 Legislation

2.2.1 The Planning and Compulsory Purchase Act (as amended):

- Section 14A gives ministers powers to set out requirements in Regulations regarding the preparation, maintenance and publication of registers of land.
- Section 19(1B) of the Act states that each 'local planning authority must identify the strategic priorities for the development and use of land in the authority's area.'
- Section 33A of the Act places local planning authorities under a duty to cooperate with other local planning authorities in preparing Local Plans, where strategic matters have impacts across administrative boundaries.

2.2.2 The Brownfield Land Register Regulations 2017 set out requirements for the preparation, publication and maintenance of Brownfield Land Registers by local planning authorities. The Registers, as defined by the Regulations, are concerned with areas of previously developed land which are suitable for housing-led development.

2.3 National Policy

2.3.1 National Planning Policy for England is set out in the National Planning Policy Framework (NPPF) (2021). The NPPF details the purposes of the planning system in terms of 'Sustainable Development', which is comprised in three 'overarching objectives, which are interdependent and need to be pursued in mutually supporting ways':

- an economic objective;
- a social objective;
- an environmental objective.

National policies relevant to housing delivery include:

- Paragraph 11 (presumption in favour of sustainable development), including the requirement that 'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs which cannot be met within neighbouring areas', unless specific constraints apply in terms of national policy regarding 'areas or assets of particular importance', or unless any adverse impacts would 'significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.
- Paragraph 20, requiring that Strategic Policies make sufficient provision for 'housing (including affordable housing)'.
- Chapter 5: Delivering a sufficient supply of homes.
- Chapter 11: Making effective use of land.

2.3.2 Planning Practice Guidance is a web-based resource containing Government guidance regarding compliance with national planning policy and legislation. It is periodically updated. Sections of particular relevance to housing supply include:

- Brownfield Land Registers;
- Effective Use of Land;
- Housing and economic needs availability assessment;
- Housing Supply and Delivery.

2.3.3 The National Design Guide and National Model Design Code have been published by the government as additional guidance setting out how the policies in design which are set out in the NPPF can be achieved. The National Design Guide identifies the key components of good design. The National Model Design Code sets out how design codes, guides and policies for the local implementation of these principles should be prepared.

2.4 Evidence

2.4.1 **Monitoring of Policy Implementation** through the council's Authority Monitoring Reports has shown that overall housing delivery since 2015 has been running significantly ahead of the adopted annual average 340 dwelling requirement, with an average of 498 dwellings being delivered each year in the period 2015-21.[3] A net total of 356 further dwellings was added in 2021/22 with a further 170 being added in 2022/23. Even allowing for the fall in completions in 2022/23, which is mainly reflective of the impact of water neutrality requirements and resource and labour supply constraints currently affecting the construction sector, average net completions for the period 2015-23 stand at 439 dwellings, exceeding the Local Plan requirement.

2.4.2 A feature of the delivery during this period is that allocated sites have been slower to come forward than anticipated and have, therefore, made a smaller contribution to housing supply, so far, than anticipated. During the period 2015-23, sites allocated in the Local Plan made a gross contribution of 2,429 dwellings compared with 3,090 projected for the same period in the 2015 Local Plan Housing Trajectory, while other sites identified in the 2015 Housing Trajectory made a contribution of 170 rather than the 230 projected.[4] So, as of April 2023, a significant proportion of the indicative housing supply allocated for the 2015-30 period in 2015 (1,136 dwellings out of 3,565[5]) remained undelivered.

2.4.3 Windfall sites, on the other hand, have made a significantly larger contribution than expected, with 952 dwellings coming forward on sites not identified in the 2015 Housing Trajectory (including small sites) during 2015-23, compared to a projected figure of 495 (including small sites).[6] This has been particularly true in the case of commercial to residential change of use prior approval schemes. Usually these have taken place in former office premises.

2.4.4 One spatial characteristic of the housing supply delivered during the period 2015-23, accentuated by the windfall supply, has been the development of the Town Centre as a residential location. Residential accommodation in the Town Centre was negligible at the beginning of the twenty-first century but has grown significantly over the past

[3] This figure includes an adjustment for accommodation in use class C2 whereby every 1.8 bedrooms within this class is considered as equivalent to a single residential dwelling. The adjustment results in a net change of -48 in respect of net dwelling completions over the period 2015-21, mainly as a result of the demolition of the 100-bedroom Oakhurst Grange nursing home at 44 Goffs Park Road in Southgate.

[4] These figures exclude sites which featured in the Local Plan housing trajectory as part of the post-2015 housing supply but which were in fact already complete as of April 2015 (Brunel Hall, Brunel Place; 19-21 Queensway; and Scout Group and Guides Hall, Lark Rise).

[5] Figures exclude completions prior to April 2015 on sites allocated in the 2015 Local Plan.

[6] Comprising the annual windfall allowance of 55 x 8, combined with an additional 55 dwellings on small sites which were permitted at the time of the 2015 Local Plan Housing Trajectory.

two decades. As of April 2023, the total number of Town Centre dwellings exceeds 1,100, resulting in a population equivalent to a small neighbourhood. The target of 499 dwellings to be delivered on Town Centre Key Opportunity Sites already looks set to be exceeded, with 276 already delivered, and a further 490 benefitting from outline planning consent.

2.4.5 The overall result of these trends has been a 'flatter' delivery curve than was projected at the time of adoption of the Plan. Thus, whereas the 2015 Local Plan Housing Trajectory projected high levels of delivery in years 1 to 5, followed by a significant tailing off in years 6 to 10, and then again in years 11 to 15, actual levels of delivery during 2015-23 have tended over time to fall closer to (while still exceeding) the average annual local plan requirement of 340dpa.

2.4.6 Since the delayed allocated sites are still expected to come forward in time (with, in many cases, a higher quantum of development than previously projected, due to the Local Plan's higher density expectations and work with applicants to maximise capacity on sites), the delivery of additional windfalls in 2015-23 amounts to an increase in the overall housing supply, compared with what was set out in the Plan. As such, calculations of the council's five year housing land supply – set out alongside the Housing Trajectory in successive Authority Monitoring Reports – have indicated a significant surplus.

2.4.7 In the context of the **Housing Delivery Test** calculation, the combination of a relatively high rate of delivery with the export of unmet need to neighbouring authorities on the basis of a lower anticipated housing supply has generated high results of 181%, 235%, 252% and 406% in 2018, 2019, 2020 and 2021 respectively. To a large extent these figures are considered to be a function of the way in which the calculation is undertaken, rather than a meaningful indication of the balance of housing demand and supply.

2.4.8 The Submission Local Plan 2024 -2040 is supported by a **Strategic Housing Land Availability Assessment (SHLAA)** dated September 2022.[7] This sets out to assess sites in Crawley which may be capable of contributing to the borough's housing supply over the period 2021-40. It includes sites from the following sources:

- Unimplemented sites included in earlier versions of the SHLAA going back to 2014;
- Sites with unimplemented planning permission for residential development (or where applications for prior approval have been granted but not implemented);
- Unimplemented sites which are allocated in the 2015 Local Plan or proposed for allocation in the Submission Local Plan 2024-2040;
- Sites where planning permission has expired within the last 7 years;
- Sites where planning permission (or prior approval for change of use) has been refused;
- Sites which have been promoted to the council, including in response to a Call for Sites undertaken alongside the Local Plan Regulation 18 consultation in 2019.

[7] Strategic Housing Land Availability Assessment (2023 - base date 30 September 2022), CBC: https://crawley.gov.uk/sites/default/files/2023-02/Strategic%20Housing%20Land%20Availability%20Assessment%20February%202023.pdf

Sites capable of delivering between 1 and 4 dwellings are only included where they have a live consent, and where these sites are uncommenced a discount is applied on the assumption that only 45 per cent of the dwelling quantum will be delivered. This adjustment is made to allow for an anticipated level of non-delivery on these sites and is applied on a standard basis by West Sussex County Council as part of their annual Residential Land Availability survey.

Where sites are considered suitable an indicative development yield is specified and, subject to assessment of availability and achievability, this is counted as part of Crawley's housing land supply, with projected development timescales set out (based on the Housing Trajectory – discussed below).

The SHLAA is structured according to the following categories:

Category A	Large Housing Sites (5+ dwellings) with planning permission
Category B	Small Housing Sites (1-4 dwellings) with planning permission
Category C	Local Plan Key Housing Allocations (Policy H2) which are 'deliverable'
Category D	Local Plan Key Housing Allocations (Policy H2) which are 'developable'
Category E	Local Plan Key Town Centre Opportunity Sites (Policies H2 & TC3)
Category F	Broad Locations
Category G	Suitable sites which are 'deliverable'
Category H	Suitable sites which are 'developable'
Category I	Sites that are suitable but currently undeliverable/undevelopable
Category J	Sites which are unsuitable for residential development

2.4.9 The Submission Local Plan is also supported by a **Housing Trajectory** with a base date of 31 March 2023.[8] This sets out projected timescales for the delivery of the housing supply identified in the SHLAA over the period 2021/22 to 2039/40 (with the Local Plan period itself counted from 2024/25). Some small differences in the sites included and their projected build-out, arising from the different dates of these documents, are set out in Appendix B. In addition to the SHLAA sites, the Housing Trajectory includes a windfall allowance in accordance with the Windfall Statement discussed below. In the case of the sites identified as coming forward in the form of communal (C2) development, an equivalent C3 total is indicated based on the ratio of 1 dwelling / 1.8 bedrooms as specified in the Housing Delivery Test: 2021 measurement technical note.

2.4.10 The Housing Trajectory is set out in four sections:

[8] Housing Trajectory 31 March 2023 (2023) CBC: https://crawley.gov.uk/sites/default/files/2023-05/17.%20Housing%20Trajectory%2031%20March%202023.pdf

- Summary Trajectory, setting out the overall gross and net delivery, broken down into identified sites, windfalls and communal accommodation (since the windfall allowance includes an allowance for small sites it is reduced in the years 2024/25 and 2025/26 to avoid double counting of small site delivery already included in the yield from identified sites). A 5-year housing land supply of 5.5 years is calculated on the basis of this, in relation to the Housing Requirement set out in Policy H1 of the draft Plan.
- SHLAA Category Breakdown, setting out how the projected delivery breaks down between different categories of sites identified in the SHLAA.
- Sites breakdown, detailing the projected timing of delivery on individual sites with a yield of 5 units or more.
- Communal Accommodation summary, breaking down the contribution of sites projected to provide communal residential development, as summarised in the Summary Trajectory.

The timings detailed in the housing trajectory reflect a range of information sources, including responses (or non-responses) from site owners and developers, progression of a site in terms of applying for and obtaining planning permission (and outline consent and reserved matters where applicable), and the emerging water neutrality scheme (further described in section 3.10). The timings take into account the assessment of sites as being either 'deliverable' or 'developable' in accordance with the definitions set out in Annex 2 of the NPPF. The council is seeking to have its 5 year housing supply confirmed through the Local Plan examination process, and therefore further justification for the identification of a 5 year supply of 'deliverable' sites (with an associated 10% buffer) is set out in the 5 Year Housing Land Supply Statement provided in the Appendix.

2.4.11 Appendix B to this Topic Paper sets out the detailed updates to the SHLAA in relation to the most recent Housing Trajectory (March 2023).

2.4.12 In accordance with the Brownfield Land Register Regulations, the council has annually updated its **Brownfield Land Register (BLR)** since 2017[9]. The 2022 update contains 31 sites with a total area of 16.51ha. For some of the sites (where no form of planning permission currently exists) the projected yield is expressed as a range rather than a single figure, in accordance with the Regulations and the Government's data standards for the Register.

2.4.13 The housing windfall allowance included within the Housing Trajectory and in the overall projected housing supply for the Local Plan period is based on a separate **Windfall Statement** which is published separately as part of the Local Plan evidence base[10]. The findings of this Statement are summarised in further detail in Section 3.6 below.

[9] Crawley Borough Council Brownfield Land Register: https://crawley.gov.uk/planning/planning-policy/engagement-and-monitoring/brownfield-land-register

[10] Crawley Windfall Statement (2023), CBC: https://crawley.gov.uk/sites/default/files/2023-05/18.%20Windfall%20Statement%20-%20May%202023.pdf

2.4.14 The Submission Local Plan approach to densification and urban form is supported by the **Compact Residential Development Study** (2023)[11]. The study has been prepared to support the Local Plan approach in responding to the emphasis placed on the effective use of land in the NPPF. It builds on an understanding of the town's existing character as set out in the 2008 **Historic Character Assessment Report** and 2009 **Baseline Character Assessment**[12]. It identifies the potential for achievement of increased densities and a more compact form of development within the borough, particularly in locations accessible by sustainable transport, and the potential for this to deliver wider benefits in terms of wellbeing and climate change, provided that this is undertaken in a way which responds to existing character and incorporates high standards of design.

3. Strategic Issues

3.1 Housing Requirement

3.1.1 On the basis of the housing supply identified in the SHLAA and Housing Trajectory, Policy H1 of the Submission Local Plan sets a requirement of 5,030 dwellings over the period 2024-40, representing an annual average of 314 over 16 years. The Housing Trajectory projects that delivery of this supply will be weighted towards the early and middle part of the Local Plan period, with delivery falling in years 11 to 16 as the supply of identified sites dwindles. In order to take account of this, and in particular to avoid a situation where the council fails the Housing Delivery Test in later years due to delivery levels falling below the average for the whole period, a stepped housing requirement is proposed as follows:

- 400dpa in years 1-5
- 360dpa in years 6-10
- 205dpa in years 11-16

The Housing Trajectory calculates a 5.5 year housing supply on the basis of this Local Plan requirement, including a 10% buffer brought forward from later in the Local Plan period in accordance para. 74 of the NPPF, representing the appropriate buffer to use when confirming a 5-year housing supply as part of the Local Plan process. This partially 'front loaded' housing requirement sets a higher bar for delivery in the earlier part of the Local Plan period than would arise from an 'un-stepped' average for the full Local Plan period, and the requirement for years 1 to 5 represents an increase on the current adopted requirement of 340dpa.

3.1.2. Appendix C compares the latest iteration of the proposed housing requirement with various earlier housing growth scenarios in respect of the period 2015-40, representing the period from Year 1 of the adopted 2015 Plan, to Year 16 of the proposed 2024 Plan. For years extending beyond the Local Plan periods on which previous housing requirements were based, the annual windfall delivery figure has been rolled forward. Based on this approach, it will be seen that each successive

[11] Compact Residential Development (2023), CBC: https://crawley.gov.uk/sites/default/files/2023-05/19.%20Compact%20Residential%20Development%20Study%20May%202023.pdf

[12] Crawley Historic Character Assessment Report (2008), Sussex Extensive Urban Survey (EUS): https://crawley.gov.uk/sites/default/files/documents/INT164001.pdf; Crawley Baseline Character Assessment (2009), CBC (individual chapters accessible at https://crawley.gov.uk/planning/planning-policy/local-plan/local-plan-review-evidence-base/local-plan-review-evidence-base)

iteration up to and including the proposed Local Plan has involved an uplift in projected housing delivery.

3.2 New Sites

3.2.1. Due to Crawley's reliance on previously developed land within the town as a source of housing supply there is little scope for strategic-scale residential development. Instead, sites (e.g. as detailed in the SHLAA) range in size from single dwellings up to the hundreds, with a lower average yield per site than might be expected in a large rural district. One feature of this type of housing supply is that sites can become available and be promoted within a relatively short time frame as they are released from other uses. In this context, it is not always easy to predict which sites may be promoted for residential development and what additional dwelling quantum may result. As detailed in the Windfall Statement, windfall sites which were not identified in the Crawley Borough Local Plan 2015 (Crawley 2030) provided 920 additional net dwellings over the period 2015-22. The March 2023 Housing Trajectory records a further 32 net additional dwellings on windfall sites as part of a total delivery of 170 in 2022/23.

3.2.2. Policy H2 of the Submission Local Plan allocates seven new sites for residential use which were not identified in the Crawley Borough Local Plan 2015 (Crawley 2030). These sites have a combined projected site capacity of 682 dwellings, as detailed in the following table:

Site Name	Indicative Site Capacity	Commentary
Upper Floors, 7 – 13 The Broadway & 1 – 3 Queens Square	25 dwellings	Deliverable. Granted planning permission in March 2016 (CR/2015/0694/FUL). Works have been completed but commencement is understood to have post-dated expiry of the permission, so regularisation will be required.
Land Adjacent to Sutherland House, Russell Way, Three Bridges	30 dwellings	Developable. Site is within curtilage of a former office building now converted to residential use, and is currently being promoted for additional new-build development.
Shaw House, Pegler Way, West Green	33 dwellings	Deliverable. Previous consents on the site (CR/2016/0816/PA3; CR/2014/0811/FUL) have totalled 33 dwellings. Conversion works started pursuant to prior approval CR/2016/0816/PA3) were not completed within the three year time limit and the scheme requires planning regularisation.
The Imperial, Broadfield Barton, Broadfield	19 dwellings	Developable. Previously benefited from full planning permission

Site Name	Indicative Site Capacity	Commentary
		(CR/2017/0519/FUL) for 19 apartments and A1 / A4 uses at ground floor level.
Crawley College, Three Bridges	363 dwellings	Developable. The remaining College Site (following development of Bridgefield House) is allocated as a Town Centre Key Opportunity Site for housing-led development alongside retained Further Education facilities. A Masterplan has been prepared.
MOKA	152 dwellings	Developable. This site benefits from planning permission for a 152-apartment scheme (CR/2019/0542/FUL) and demolition was undertaken in April 2023, although implementation of this may be delayed by viability issues. The site is allocated as a Town Centre Key Opportunity Site.
St. Catherine's Hospice	60 dwellings or Residential Rooms	Deliverable. This site is becoming available with the relocation of the Hospice to Pease Pottage, and is allocated for Housing for Older People and those with Disabilities, either in C2 or C3 use.

3.3 Densification

3.3.1 The Local Plan approach to densification and urban form, as supported by the Compact Residential Development study, is set out in draft Local Plan Policies CL2: Making Successful Places – Principles of Good Urban Design, CL3: Movement Patters, Layout, and Sustainable Urban Design, CL4: Compact Development – Layout Scale and Appearance, CL5: Development Briefs and Masterplanning, and DD3: Standards for All New Dwellings (including conversions), as well as the housing typology Policies (H3, H3a-f).

3.3.2 Policy CL2 sets out that 'All new development must identify, test, determine and (where appropriate) embrace opportunities for increased density.

3.3.3 Policy CL3 sets out a general expectation that new developments should seek to exploit and support sustainable transport options and connections, using these to enable a more compact form of development.

3.3.4 Policy CL4 sets out density-range expectations for residential developments in different areas, subject to character constraints, ranging from a baseline level of 45 dwelling per hectare up to more than 200 dwellings per hectare in highly accessible locations. It provides further detail on how the principle of compact development will

be applied in relation to developments of significant scale elsewhere, including requirements for how they will be situated in relation to public transport services. These density ranges relate to the ranges identified in the National Model Design Code, as shown in the table below:

NMDC Area Types	**NMDC Description**	**NMDC Area Type Density Range (dwellings per hectare)**	**Equivalent CBC Policy CL4 Density Range**	**Equivalent CBC Policy CL4 Density Range (dwellings per hectare)**
Outer suburbs	'Few apartments and less of a mix of uses'	20-40	N/A	N/A
Suburbs	'A mix of short terraces and semi-detached units.'	40-60	45-60	Minimum within the Built Up Area
Urban Neighbourhood	'Urban neighbourhoods with… a mix of uses.'	60-120	60-200	Moderate density (for neighbourhood parades and other locations close to facilities and enhanced public transport connections)
Town/City Centre	'A typical dense city typology with… a strong mix of uses.'	120+	200+	High density (for sites close to Town Centre transport hubs or Three Bridges Station)

3.3.5 As can be seen from this comparison, the densities proposed in Policy CL4 range from levels typical of suburbs to those considered appropriate in Town and City Centres. Density levels typical of outer suburbs or more loose-knit settlement patterns (villages and rural settlements) will not be supported unless justified in terms of the existing character.

3.3.6 Policy CL5 sets out expectations for a master-planning approach in relation to 'significant developments' (as defined in the Local Plan Glossary) or 'sites which could form part of wider development area'. This is intended to ensure that the

opportunities presented by the site, including options for providing successful active travel links to wider movement corridors and networks (thereby reducing the impact of high-density development on the highways network) have been fully exploited.

3.3.7 Policy DD3 includes specific design recommendations in respect of 'medium and higher density new residential development', intended to achieve a better standard of living environment within the development.

3.3.8 Within this framework it is anticipated that proposals for residential development are likely to come forward in various different circumstances, particularly within the current Built-Up Area Boundary and on previously developed land. Policies H3 and H3a-f therefore set out an approach to 'Housing Typologies', understood as sites of particular types in terms of their existing uses and physical form. Policy H3 sets overarching requirements while Policies H3a-f set out further requirements specifically tailored to schemes of the following types:

- Estate Regeneration;
- Densification, Infill Opportunities and Small Sites;
- Town Centre Sites;
- Upward Extensions;
- Conversions from Commercial/Non-residential uses;
- Open Spaces.

3.4 Densification: Reassessment of Existing Allocated Sites

3.4.1 The scope for the achievement of higher densities and a more compact pattern of development is illustrated by the way in which the delivered or anticipated dwelling totals on many sites allocated in the adopted Local Plan have come to exceed those projected at the time of allocation. This trend, as detailed in the table below, has resulted in an anticipated net gain of 1,170 dwellings compared with what was projected at the point of allocation. There have been various immediate triggers for such changes, including grants of planning permission for larger schemes, and the reassessment of site potential in light of feasibility work and urban design input provided in support of Local Plan Review process.

Site Name	Adopted Indicative Site Capacity	Updated Indicative Site Capacity	Difference	Commentary
Forge Wood	1,900 dwellings	1,837 dwellings	-63 dwellings	Reserved Matters progressing against Outline Permission granted for Up to 1,900 dwellings. It is currently anticipated that the actual delivery will fall slightly short of the overall total.

Site Name	Adopted Indicative Site Capacity	Updated Indicative Site Capacity	Difference	Commentary
Land Adjacent to Desmond Anderson	100 dwellings	205 dwellings	105 dwellings	Increase resulting from reassessment of site potential.
15-29 Broadway Upper Floors	57 dwellings	78 dwellings	21 dwellings	Larger scheme permitted (CR/2015/0609/FUL) and completed during 2020/21.
Zurich House	59 dwellings	53 dwellings	-6 dwellings	Reduction owing to amended proposal (conversion and extension of existing building – CR/2019/0271/PA3 & CR/2019/0681/FUL – rather than demolition and rebuild).
Former TSB Site	40 dwellings	59 dwellings	19 dwellings	Planning application for 59 dwellings (CR/2020/0037/FUL) approved subject to S106 in February 2021
Longley Building	48 dwellings	121 dwellings	73 dwellings	Scheme of 121 dwellings (CR/2020/0024/FUL) was approved subject to S106 in November 2020.
Telford Place	99 dwellings	380 dwellings	281 dwellings	Increase resulting from reassessment of site potential. Outline application (CR/2023/0357/OUT) pending determination.
Crawley Station and Car Parks	300 dwellings	308 dwellings	8 dwellings	Outline Planning Permission (CR/2016/0294/OUT) Granted; further detailed proposals (CR/2019/0602/ARM & CR/2019/0660/FUL)

Site Name	Adopted Indicative Site Capacity	Updated Indicative Site Capacity	Difference	Commentary
				approved subject to S106 in April 2021.
County Buildings	50 dwellings	135 dwellings	85 dwellings	Increase resulting from reassessment of site potential.
Land North of the Boulevard	50 dwellings	458 dwellings	408 dwellings	185 dwellings completed 2016/17 (CR/2015/0192/PA3); 273 further dwellings projected of which 91 commenced (CR/2016/0662/FUL) and 182 subject to outline consent (CR/2017/0997/OUT).
Tinsley Lane	120 dwellings	120 dwellings	0 dwellings	Housing and Open Space Site. Policy requirements to replace football club and other open space provisions. Development Brief prepared. Outline Planning Application for 150 dwellings (CR/2018/0544/OUT) was refused in October 2020. Revised application for 138 dwellings (CR/2021/0355/OUT) currently pending determination.
Breezehurst Drive Playing Fields	65 dwellings	85 dwellings	20 dwellings	Housing and Open Space Site. Policy requirements to replace football pitch and other open space provisions. Development Brief prepared. Planning Application (CR/2020/0192/RG3) for 85

Site Name	Adopted Indicative Site Capacity	Updated Indicative Site Capacity	Difference	Commentary
				dwellings approved subject to S106 in February 2021.
Land East of Balcombe Road/Street Hill, Worth	Maximum 15 dwellings	Maximum 15 dwellings	0 dwellings	Site constrained by heritage, ecological, flooding and countryside character.
Oakhurst Grange	55 dwellings (or 120 residential rooms)	55 dwellings (or 120 residential rooms)	0 dwellings	Planning permission (CR/2016/0972/FUL) for facility with 146 rooms in total has been commenced by demolition of existing buildings.
Town Centre Broad Location	156 dwellings	239 dwellings (not including residual Crawley College site which is subject to an agreed masterplan and separate draft allocation for 363 dwellings)	83 dwellings	98 dwellings (CR/2018/0341/FUL) completed at Crawley College in 2020/21 (raised from 36 in adopted Plan); 12 dwellings allocated at Cross Keys (down from 18 at equivalent site 'Old Vicarage, Church Walk' in adopted plan); 129 dwellings projected from other Town Centre Broad Location sites (up from 102 in adopted Plan).
Residual Land at Forge Wood	150 dwellings	373 dwellings	223 dwellings	Outline Planning Permission granted for 185 dwellings at Steers Lane (CR/2018/0894/OUT) and Reserved Matters pending determination (CR/2020/0548/ARM). Land at Heathy Farm allocated for 188 dwellings.

Site Name	Adopted Indicative Site Capacity	Updated Indicative Site Capacity	Difference	Commentary
Land East of London Road	171 dwellings	84 dwellings	-87 dwellings	Reduction in projected yield owing to concerns over site assembly and some incursion on previously identified area from neighbouring development.

3.5 Employment Land, Upward Extensions & Town Centre

3.5.1 One key theme of the Submission Local Plan is the striking of an appropriate balance between the supply of housing and support for the borough's economy, through the maintenance of a supply of employment land and support for key assets within the economic structure of the borough. Proposed Policies EC1, EC2 and TC1 seek to support these aims, while accommodating the conversion of employment land to residential use in circumstances and locations where this can be achieved without harm to the role of the main employment areas and, more broadly, the borough's fundamental economic role.

3.5.2 Policy EC1 and the supporting Employment Land Trajectory identify the borough's available supply of employment land. They show that this supply, when adjusted for projected losses to other uses, falls short of the borough's anticipated employment needs as set out in the council's Economic Growth Assessment Update, justifying the allocation of new employment land through a Strategic Employment Location at Gatwick Green by proposed Policy EC4.

3.5.3 Given the need to support the borough's employment land supply, and given the significance of the borough as a focus of economic activity across a wider area, Policy EC2 seeks to protect employment uses within 11 identified Main Employment Areas, including 10 existing employment areas with established characters and functions, as well as the proposed Gatwick Green site. The council has also introduced Article 4 Directions to protect employment uses within many of these Areas.

3.5.4 The Town Centre is included among the Main Employment Areas identified in Policy EC2. Policy TC1 seeks to support the vitality and viability of the Town Centre by maintaining ground floor premises in suitable uses within the defined Primary Shopping Area. At the same time the policy provides scope for use of upper floors within this Area for a wider range of uses, including residential use and town centre neighbourhood facilities, subject to requirements of Policy EC2 where any a net loss of employment floorspace must be justified. The approach is similar to that taken under the current adopted Policy EC5, under which there has been an increasing diversification of uses at upper-floor level within the Primary Shopping Area, including an increase in residential accommodation. As part of the housing typology approach described in section 3.3 above, Policies H3 and H3c provide a framework for consideration of residential schemes in these circumstances. Policy H3d

meanwhile sets out the approach in relation to upwards extensions, which provide a further potential means of supporting a wider range of uses and an increase in residential accommodation.

3.5.5 Across the Town Centre more generally the approach of the existing and proposed Local Plan Policies is to support an increase in residential accommodation in suitable locations through the allocation of Town Centre Key Opportunity Sites. Policy TC3 of the Submission Local Plan sets a target of 1,500 net additional dwellings across sites in this category over the period 2021-40 – an increase of a thousand additional new dwellings compared with the adopted Local Plan which set a target of 499 dwellings across the Town Centre Key Opportunity Sites. Policy TC2 also expressly recognises the changing role of the Town Centre and supports development of neighbourhood facilities to meet the needs of a growing residential population.

3.6 Windfalls

3.6.1 The **Windfall Statement** projects a windfall allowance of 100 dwellings per annum, representing a significant uplift from the allowance of 55 dwellings per annum included in the 2015 Local Plan and Housing Trajectory. This raised allowance is reflected in the March 2023 Housing Trajectory. It is based on an assessment of the council's earlier 2014 Windfall Paper, in light of actual levels of windfall delivery following the adoption of the Local Plan. In particular it allows for:

- a higher rate of delivery of homes through office-to residential changes of use on windfall sites, reflecting the contribution which such sites have made since 2015, and the extent to this can be sustained given potentially available office stock;
- the achievement of higher densities of development in suitable locations, through a greater policy focus on densification and urban form, in accordance with the emphasis placed on the 'effective use of land' by the NPPF, and the approach set out in Policies CL2, CL3, CL4, CL5, DD3, H3, H3a-f, and the Compact Residential Development study.
- The council's ongoing own-build programme for delivery of affordable housing on CBC-owned land. This programme, overseen by the council's corporate Strategic Housing Board, has been effective over recent years in identifying development opportunities and bringing forward new residential schemes on council-owned land.

3.7 Open Space

3.7.1 Three linked Open Space, Sport and Recreation studies have been undertaken as part of the evidence base for the Local Plan. In the context of the Housing Supply topic paper, these studies provide an understanding of open space need/supply within the borough and help the council identify any scope for release of some of this land for housing. The three studies are: the Playing Pitch Strategy[13]; Open Space, Sport and

[13] Playing Pitch Strategy Stage C Needs Assessment (March 2021) 4Global: https://crawley.gov.uk/sites/default/files/2021-04/PPS_Stage_C_needs_assessment_March_2021.pdf Playing Pitch Strategy Stage D Strategy and Action Plan (March 2021) 4Global: https://crawley.gov.uk/sites/default/files/2021-04/PPS_Stage_D_strategy_action_plan_March_2021.pdf

Recreation Assessment[14]; and the Indoor Sports Facilities Assessment[15]. Each study provides an outline of the use and participation in sports and sporting venues within Crawley, explains current national and local policies and provides recommendations and action plans for moving forward. The Playing Pitch Study and the Indoor Sports Facilities Assessment have been prepared in accordance with Sport England guidance and have both been signed off by Sport England.

3.7.2 Key messages from the Playing Pitch Strategy include:

- Sports such as cricket, football and rugby analysed within the study area are playing on pitches over capacity. The summary tables in Chapter 3 of the "Stage D" Report recognise that, due to projected population growth, football, cricket and rugby have a need to increase the supply of available pitches to meet future demand and the level of overplay on sites has to be taken into account in open space assessments in order to forestall a larger level of unmet demand in the future. The Report also identifies a current theoretical deficit and future deficit in Artificial Grass Pitches.
- While tennis, golf, petanque, and netball have sufficient capacity to expand, removal of these recreational spaces would be likely to cause a deficit.
- A consultation with the Bowls clubs has shown that they may require additional space but a further consultation is required.

The study has specific recommendations for each sport. However, in general, Recommendation G0 is to protect all current pitches identified in order to reduce risk of loss and subsequent impact on sport and physical provision. The study does not support the loss of dormant or currently disused playing field sites (the study identifies 5 sites as either lapsed – i.e. not used for formal sport in the past 5 years – or disused – i.e. disused for a period of less than 5 years). Recommendation G1 is to increase provision in relation to population growth. This links to G2 and G3 where the aim is not to lose pitches but to enhance ancillary facilities and drainage provision where necessary.

3.7.3 According to the Open Space, Sport and Recreation Assessment:

- In each open space typology assessed, other than allotments, the Assessment's proposed quantity standards are, on a study wide area, reached (Table 37 of the Assessment). This is helpful in meeting the Assessment's recommendation to 'Adopt the Recommended Standards'.
- Existing quantity provision against proposed quantity provision shows a narrow surplus (ha/1000 population) for most open space typologies other than allotments, which is in deficit, and Cemeteries and Churchyards and Civic Spaces, which do not have a proposed standard in hectares (Table 38 of the Assessment). However, a key recommendation of the Assessment is 'Protect Surplus Open Space'.
- The future provision shows a lower surplus (and higher deficit for allotments) than the current provision (Table 39 of the Assessment).

[14] Open Space, Sport and Recreation Assessment (December 2020) The Environment Partnership: https://crawley.gov.uk/sites/default/files/2021-02/Open_space_sport_and_recreation_assessment_Feb21.pdf
[15] Indoor Sports Facilities Assessment (January 2021) Strategic Leisure Limited: https://crawley.gov.uk/sites/default/files/2021-01/Indoor_Sports_Facilities_Assessment_January_2021.pdf

- The surplus does not consider loss of space through proposed housing allocations during the Local Plan period (see para. 3.7.10 and accompanying table below). Therefore, the surplus is likely to be lower by the end of this period.
- Furthermore, when considering surplus open space, the Assessment recommends that the historical, cultural, visual, amenity and ecological value of a site is acknowledged in order to understand the full ramifications of its loss including wider green infrastructure implications.
- Distribution of open space, and types of open space, across the borough is uneven.

3.7.4 The Indoor Sports Facilities Assessment:

- Recognises the need to protect the existing facility mix within Crawley (Recommendation 1 of the Assessment).
- It acknowledges that nearby development at Crawley (i.e. outside of Crawley's administrative boundaries but immediately adjacent to the borough) will have a significant impact on Crawley's resources.
- In relation to future demand, the analysis on indoor bowls, swimming pools, fitness suites and studios, indicates a need to expand in recognition of population growth.
- For indoor tennis, the Assessment highlights the Lawn Tennis Association's mandate for priorities in South East England and this shows the importance of working with the national governing bodies of sports to achieve a sports success, particularly as although Crawley is not listed as a priority area for improvement, several neighbouring authorities are. There is evidence within the assessment of the sport of participants travelling to neighbouring facilities and vice versa. The Assessment highlights that for indoor tennis it is important for access to pay and play tennis both now and in the future. Therefore, at a minimum, the facility supply available must remain the same.
- Gymnastics and trampolining are looking to expand to have additional facilities, as the supply of facilities is significantly inadequate for meeting current demand.
- There are several other sports: squash, judo, boxing, parkour, martial arts, dance and table tennis whose provision is required to be maintained.

3.7.5. In conclusion, scope for release of additional open space for housing is severely constrained by the importance of retaining open space, including the various pitches, open spaces and indoor facilities within Crawley, as an asset serving the community. The needs met include both formal play and informal play (which may not be as well recorded). Each study has been robustly prepared and in general recommends protecting, improving and enhancing existing provision and ancillary facilities in order to compensate for sites where over-use and over-playing occurs as well as to plan for the anticipated future population growth. In particular, consideration needs to be given for disused sites within the borough as to whether improvements can lead to a better balancing of open space, sport and recreation use across the borough (including pitch provision).

3.7.6 Part of the Local Plan Policy test is: in order to build on open space, it must be in a surplus to open space, sport and recreation requirements. However, the narrow existing surplus and future surpluses within the Open Space, Sport and Recreation Assessment need to be considered in the context of what wider facilities will be

available for the community who will live on the housing site once built. In addition, applications which enter the planning register between the end of the Assessment and the next update are not necessarily factored into the surplus. Therefore, the surplus of open spaces may be lower than anticipated, particularly as sites within Crawley for housing are increasingly small and rarely offer opportunities to secure new additional open space as part of the developments. This is justification for protecting what open space is available due to the already acknowledged decrease in surpluses where future population growth is considered. In addition, the distribution of open space across the borough means that in some locations residents have further to travel to enjoy particular types of open space. Existing "surplus" open space for one typology could potentially be redeveloped for another type of open space needed for that location.

3.7.7 In relation to the Playing Pitch Strategy, consideration for disused sites should first be given to other recreational sports, as stipulated within the open space Local Plan Policy OS1. The Strategy supports this by highlighting where each national governing sport body is planning on investing. Furthermore, consideration needs to be given to neighbouring authorities who make use of Crawley's facilities and affect the supply available to Crawley's population.

3.7.8 On this basis, altogether there are several priorities and uses for current open space provision and each site's existing use is needed to be balanced within the wider open space, sport and recreation context to ensure it meets future population growth needs and resolves existing over-capacity issues.

3.7.9 The evidence of the Open Space studies is reflected in Policy OS1 of the Submission Local Plan 2024, which requires that proposals which remove or affect existing open space, sport and recreational spaces will only be supported where they have been demonstrated to be surplus to requirements, or where the loss would be offset or outweighed by equivalent or better provision in a suitable location, or where the development provides alternative sports and recreational provision for which there is a greater need. In the context of the Housing 'Typology' Policies, Policy H3f sets out further requirements in relation to such schemes, relating to such issues as:

- impact on character and environmental value;
- design;
- mitigation of adverse impact on the wider Green Infrastructure Network;
- biodiversity net gain; and
- Flood risk impact.

Specific requirements are also set out in relation to development on garden sites, including impact on character, protected trees and Ancient Woodland.

3.7.10 The following proposed Local Plan housing allocations include land identified as open space:

Site Name	Indicative Site Capacity	Commentary
Tinsley Lane	120 dwellings	Housing and Open Space Site. Policy requirements to replace football club and other open space provisions. Development Brief prepared. Outline Planning Application being considered for 150 dwellings.
Breezehurst Drive Playing Fields	65 dwellings	Housing and Open Space Site. Policy requirements to replace football pitch and other open space provisions. Development Brief prepared. Planning Application being considered for 85 dwellings.
Land East Balcombe Road/Street Hill, Worth	Maximum 15 dwellings	Policy requirements to secure ecological enhancements, management and maintenance on remaining Local Nature Site.

3.7.11 These were all examined at the previous Local Plan examination for the adopted Local Plan. The Policy wording for these sites details the expectations required in order to mitigate the loss of the open space for development. The inclusion of this detail was supported by Sport England as part of the Main Modifications consultation held in summer 2015[16]. Since the adoption of the Local Plan liaisons with Sport England continued through the preparation of the subsequently adopted Development Briefs for both Tinsley Lane Playing Fields[17] and Breezehurst Drive Playing Fields[18] allocation sites in addition to their role as a statutory consultee to the planning applications. This has included consideration of the most up-to-date information regarding sports and club needs at the time to ensure the open space and sports needs continue to be adequately and proportionately met through the improvement of these sites.

3.8 Estate Regeneration

3.8.1 Estate Regeneration represents a specific form of development whereby residential development is achieved through the renewal and in some cases redevelopment of existing estate housing. Historically the scope for this has been limited by the relative

[16] Crawley Local Plan Main Modifications Consultation Statement, Appendix 8: Representations Received, pages 63-66 (August 2015) CBC https://crawley.gov.uk/sites/default/files/documents/PUB266060.pdf
[17] Tinsley Lane Playing Fields Development Brief Supplementary Planning Document (April 2017) CBC https://crawley.gov.uk/planning/planning-policy/local-plan/supplementary-planning-documents/tinsley-lane-spd
[18] Breezehurst Drive Playing Fields Development Brief Supplementary Planning Document (June 2018) CBC https://crawley.gov.uk/planning/planning-policy/local-plan/supplementary-planning-documents/breezehurst-drive-playing

absence in Crawley of higher density flatted developments among the older 'New Town' housing stock, and latterly by the tendency for ownership to become fragmented through the sale of freehold property and the sale of leases under the Right to Buy. No significant estate regeneration schemes have as yet been proposed by the council and any potential schemes which may emerge, should resources allow, are likely to take time owing to the complexity of this kind of development. At the same time, this type of approach is expected to become increasingly relevant as part of the wider national and local agenda on densification, and is given specific support in national policy.

3.8.2 In light of this and as noted in section 3.3 above, Estate Regeneration is one of the potential forms of residential development for which provision is made as part of the 'typology' approach set out in draft Local Plan policies H3 and H3a-f. Policy H3a thus sets out specific requirements for this form of development in terms of the need for a comprehensive masterplan approach; the importance of balancing efficient use of land with residential amenity and open space requirements; and the engagement of local communities and affected individuals.

3.9 North of Crawley

3.9.1 As noted in Section 2.1 above, the constraints on the available supply of housing land within Crawley arise partly from the safeguarding of land for a potential future southern wide-spaced runway at Gatwick Airport, and the noise impacts which would arise from a runway in this location. Policy GAT2 of the Submission Local Plan proposes to keep this safeguarding in place.

3.9.2 Even in the event that national aviation policy provided certainty that safeguarding was no longer required, the additional supply of land for residential development in this area would be extremely limited, owing to noise associated with existing airport facilities, and would therefore be likely to be put to employment uses.

3.9.3 However, limited opportunities for residential development may arise in some locations, for example to the north of Langley Green and Forge Wood. Any such opportunities will be assessed through a full review of the Local Plan in the event that safeguarding is removed.

3.10 Water Neutrality

3.10.1 The draft Local Plan proposes that development taking place within the part of Crawley Borough falling within the Sussex North Water Resource Zone (WRZ) will take place on a 'water neutral' basis. 'Water Neutrality' is defined as meaning that for every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development. This is necessary in light of advice from Natural England that additional water consumption requiring to be resourced from abstraction points in the Arun Valley (as is the case within the Sussex North WRZ) may have a negative impact on Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site.

3.10.2 The draft Local Plan approach, supported by the Water Neutrality Study Part C, proposes to enable the projected quantum of development to come forward on a 'water neutral' basis within the WRZ through the approach detailed in draft Local Plan Policy SDC4, involving a combination of advanced on-site water efficiency measures and offsetting

elsewhere within the WRZ. For residential development the Policy sets a water consumption standard of 85 litres per person per day, together with confirmation that on-site additional water consumption will be offset through an agreed offsetting scheme. Further detail is provided in the Water Neutrality Topic Paper. The impact of these costs on viability have been tested through the 2022 update to the Local Plan Viability Assessment.

3.10.3 The proposed policy approach has a number of implications in respect of housing delivery:

- The quantum and timing of housing development projected for the Local Plan period is considered to be essentially similar to what they would be in a parallel case in which the water neutrality requirements did not apply (excepting for the delays arising between the issuing of the Natural England position statement in September 2021 and the adoption of the Local Plan).

  However, this position is partly dependent on the implementation of the advanced water efficiency standard contained in Policy SDC4, as set out in the Water Neutrality Study Part C. If a less stringent on-site water efficiency standard were to be implemented, e.g. the 110 litres/person/day optional standard contained in Building Regulations approved document G, this would increase demand on the available offsetting capacity. Given the limited extent of the offsetting capacity identified in the Part C study, this would be likely to further constrain the amount of residential development which can be delivered and/or the speed with which it can come forward.

  As such the overall Local Plan requirement, the Local Plan Housing Trajectory, and the 5-year housing supply are based on the assumption of the Policy approach set out in draft Policy SDC4 being implemented.

- In a context where offsetting capacity available over a given time period within the WRZ is expected to be finite, the water neutrality issue is likely to have implications in terms of which sites are able to come forward, as well as in terms of the quantum and timing of development.

  The local planning authorities which overlap with the WRZ are in the process of setting up a shared Offsetting Scheme, in which offsetting credits will be built up from a combination of water efficiencies achieved by the councils and other participating partners, together with surplus savings generated within the WRZ by Southern Water as part of their updated Water Resource Management Plan. This Scheme will operate on a cross-boundary basis, and access to it scheme is likely to be subject to formal requirements, with individual developments being ranked in priority according to various criteria.

  It is anticipated that the scheme will in broad terms seek to support a plan-led approach to development.

- In this context, there is a complex interaction between the design of the Offsetting Scheme, the emerging Local Plan housing trajectories of the participating local planning authorities, and the corporate priorities of the scheme operators. The proposed Local Plan Housing Trajectory, including the identified windfall allowance, is informed by this dialogue and is considered to be deliverable within the context of the proposed policy approach and Offsetting Scheme.

- Ahead of the joint strategy with the other affected Local Planning Authorities being implemented, Crawley Borough Council has committed £1million to forward fund the retrofitting its own housing stock to make it more water efficient. The resulting water savings are already being used to maintain the delivery of developments which form part of the identified 5-year housing supply.

4. Conclusions

4.1 The scope for Crawley borough to provide housing to meet its needs is constrained by the fact that its administrative boundaries are drawn tightly around the urban area and neighbouring Gatwick Airport. Taken in combination with other major constraints, this means that the borough's housing supply is highly dependent on a relatively limited supply of mainly medium-to-small sites, usually on Brownfield Land.

4.2 In these circumstances, and in line with the emphasis placed in national policy on the effective use of land, the proposed Local Plan approach seeks to maximise the potential yield from sites within the borough, and to realise the benefits of a more compact pattern of development as far as this may be achieved without causing serious harm to the town's key assets in terms of character, amenity, economic fabric, leisure offer and access to open space.

4.3 By means of this approach, as set out in the evidence provided in support of the Submission Local Plan, a significant additional housing supply has been identified over and above that which was identified at the point of adoption of the current Plan in 2015. This will ensure that Crawley will be able to make a substantial contribution to meeting its own housing needs for a longer period into the future. At the same time the housing supply considered achievable by these means over the period 2024-40 falls significantly short of Crawley's identified level of housing need, and as such a 'supply led' housing requirement continues to be appropriate.

Appendix A: 5 Year Housing Land Supply Statement

1. Introduction

1.1. **The council is seeking to confirm its 5 year housing land supply position (measured against the housing requirement detailed in the submission 2024-2040 Local Plan) as part of the Local Plan examination process.** This Statement details the identified five-year housing land supply and seeks to justify it in relation to national planning policy and guidance.

2. National Policy, Guidance, Case Law and Water Neutrality

National Planning Policy Framework (NPPF)

2.1. Paragraph 68 of the NPPF sets out that:

Planning policies should identify a supply of:
a) specific, deliverable sites for years one to five of the plan period; and
b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

In accordance with accompanying footnote 34, the supply of specific, deliverable sites for years one to five must include 'an appropriate buffer, as set out in paragraph 74.'
Paragraph 74 of the NPPF states that:
Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved from later in the plan period) of:
a) 5% to ensure choice and competition in the market for land; or

b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

2.2. Annex 2 of the NPPF includes the following definition of 'deliverable', to be applied in identifying the five-year housing land supply (and associated buffer):

Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Planning Practice Guidance

2.3. Planning Practice Guidance (PPG) on Housing supply and delivery states that:

In Plan-making, strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan.

For decision-taking purposes, an authority will need to be able to demonstrate a 5 year housing land supply when dealing with applications and appeals. They can do this in one of two ways:

- *using the latest available evidence such as a Strategic Housing Land Availability Assessment (SHLAA), Housing and Economic Land Availability Assessment (HELAA), or an Authority Monitoring Report (AMR);*
- *'confirming' the 5 year land supply using a recently adopted plan or through a subsequent annual position statement (as set out in paragraph 74 of the National Planning Policy Framework).'*

2.4. The PPG further states in relation to the process of confirming a 5 year land supply 'as part of the examination of plan policies':

The examination will include consideration of the deliverability of sites to meet a 5 year supply, in a way that cannot be replicated in the course of determining individual applications and appeals where only the applicant's / appellant's evidence is likely to be presented to contest an authority's position.

When confirming their supply through this process, local planning authorities will need to:

- *be clear that they are seeking to confirm the existence of a 5 year supply as part of the plan-making process, and engage with developers and others with an interest in housing delivery (as set out in Paragraph 74a of the Framework), at draft plan publication (Regulation 19) stage.*
- *apply a minimum 10% buffer to their housing requirement to account for potential fluctuations in the market over the year and ensure their 5 year land supply is sufficiently flexible and robust. Where the Housing Delivery Test indicates that delivery has fallen below 85% of the requirement, a 20% buffer should be added instead.*

Following the examination, the Inspector's report will provide recommendations in relation to the land supply and will enable the authority, where the authority accepts the recommendations, to confirm they have a 5 year land supply in a recently adopted plan.

2.5. The PPG provides further guidance on the concept of 'deliverability' and how it should be demonstrated, as follows:

In order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable

site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- *have outline planning permission for major development;*
- *are allocated in a development plan;*
- *have a grant of permission in principle; or*
- *are identified on a brownfield register.*

Such evidence, to demonstrate deliverability, may include:

- *current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
- *firm progress with site assessment work; or*
- *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites.

Case Law

2.6. Questions around the calculation of 5 year housing supply and the interpretation of the definition of 'deliverable' in the NPPF are frequently the focus of planning appeals, and have fallen to be determined by the courts in a number of cases. The resulting decisions and case law have further clarified the meaning of national policy and guidance on this issue in a number of areas. The council would draw attention to the following points in particular:

- The definition of 'deliverable' set out in the NPPF is to be interpreted as an 'open list', whereby sites or developments which do not specifically fall within the terms outlined in parts a) and b) of the definition can be found to be 'deliverable', where there is sufficient evidence (High Court Consent Order ref CO/917/2020).
    - The Secretary of State's decision in the Woburn Sands case of 2020 supported the following approach in relation to 'base dates', housing trajectories, and the definition of 'deliverable':
        - The assessment of whether a site has 'a reasonable prospect' of being delivered falls within the realms of policy and planning judgment rather than being a legal concept. 'Deliverability' is not the same as 'delivery', and a 'deliverable' site does not necessarily have to be delivered.
        - Evidence post-dating the base date for the 5 year assessment can be introduced in order to evidence the deliverability of sites, provided that it relates to sites identified as 'deliverable' at the time of the base date.
        - Proformas can, in principle, provide clear evidence of a site's deliverability. Additional evidence to support a proforma can also be considered subject to its specific content and timing.
        - Grants of prior approval can be regarded as having detailed planning permission and can form part of the supply of deliverable sites within category (a).

Water Neutrality

2.7. As detailed in section 3.10 of the Housing Supply Topic Paper, that part of Crawley which falls within the Sussex North Water Resource Zone (WRZ) is subject to a need to demonstrate that development would be water neutral. The proposed policy approach seeks to support and enable development to occur on a 'water neutral' basis. Like the overall Local Plan Housing Trajectory, the 5 year housing land supply needs to be considered in this context. This has a number of implications for the general consideration of issues of deliverability which merit separate discussion.

2.8. Firstly, as with the wider Housing Trajectory, the identified 5 year housing supply is heavily dependent on implementation of the proposed policy approach outlined in draft Policy SDC4, involving a combination of advanced on-site water efficiency standards together with offsetting of any net additional water consumption elsewhere within the WRZ. Offsetting capacity is expected to be particularly constrained in the early part of the Local Plan, as it is expected to take time for the additional offsetting capacity provided by Southern Water to come on stream, and for other offsetting options (including the councils' wider Offsetting Scheme)

to become established. In this context, any relaxation of the proposed on-site water efficiency standard will place an additional burden on a finite supply of offsetting credits, limiting the overall quantum of development which can be delivered.

2.9. Crawley Borough Council has reacted proactively to Natural England's Position Statement regarding Water Neutrality, and, ahead of the joint strategy with the other affected Local Planning Authorities being implemented, is retrofitting its own housing stock to make it more water efficient. The resulting water savings are already being used to deliver developments forming part of the 5 year supply. It has been demonstrated that the schemes at Longley House and Breezehurst Drive are water neutral and the planning permissions for those sites are imminent. Officers are currently working with developers on other schemes identified within the 5 year supply to support their delivery.

2.10. The Council also continues to work closely with the other affected authorities. As in the case of the wider Housing Trajectory, the access of individual development sites to available offsetting capacity is also a consideration. The ability of developments to come forward in years 1 to 5 of the Local Plan period will be dependent on their access to offsetting schemes, among which the Scheme to be established by the affected councils is expected to be particularly significant. Access to this Scheme is expected to be granted on the basis of priority in relation to certain criteria to be set by the Scheme operators, such as delivery of Local Plan allocations, affordable housing and job creation. The likelihood that sites will meet relevant criteria and thereby obtain access to the councils' Offsetting Scheme therefore represents a significant consideration in assessing deliverability. Further detail on how individual sites stand in relation to this is set out in the site-specific assessments provided below. As a general point it is worth noting that the overall Housing Trajectory, including the proposed 5 year housing supply (incorporating a windfall allowance of 100 dwellings per annum), are informed by dialogue among the local planning authorities falling wholly or partly within the WRZ, and by the priorities which are considered likely to inform the governance of the councils' Offsetting Scheme.

2.11. A further implication of the relationship between the Housing Trajectory and the councils' emerging Offsetting Scheme is that it underlines the importance of the exercise of planning judgement in assessing deliverability. For example, if a development reaches the planning application stage sooner than expected on the basis of the Housing Trajectory, there is a risk that water credits which might otherwise have been reserved for that development could have been allocated to another site, potentially in a different local planning authority, resulting in additional delays to the development process due to insufficient credits being available. The

relationship between the Housing Trajectory and the councils' Offsetting Scheme, and the fact that the latter will operate across the whole of the WRZ, therefore lend a particular importance to the exercise of assessing site deliverability.

2.12. An additional, technical, point concerns the impact of water neutrality on permitted development rights. The requirement for development to be 'water neutral' arises from protections extended to European wildlife sites under the Conservation of Habitats and Species Regulations 2017, and the role of local planning authorities as 'competent authorities', responsible for the exercise of certain functions, under the same Regulations. The Regulations also set out that planning permission granted by a General Development Order (such as the General Permitted Development Order) which is likely to have a significant effect on a European site must not be begun until the developer has received notification from the local planning authority that the development will not affect the integrity of the European site. The effect of this is that permitted development schemes are subject, through the condition imposed by Regulation 75, to the same water neutrality requirements as developments requiring a planning application. This is particularly relevant to permitted rights to create new dwellings subject to prior approval. Such schemes may still be granted prior approval, but the development in question can only be implemented after the LPA has later given approval separately from a Habitat Regulations perspective. This is relevant to consideration of the deliverability of residential developments within the WRZ which benefit from prior approval. It is however worth noting that permitted development schemes that may require off-setting assistance will be prioritised alongside all other schemes that require such assistance, where policy compliance such as national space standards and affordable housing delivery will carry significant weight in their prioritisation, which by default could result in such permitted development schemes receiving a low priority if they fail to provide affordable housing for example, which is frequently the case with permitted development schemes.

3. The 5 Year Housing Land Supply Requirement

3.1. The 5 Year Housing Supply requirement for the draft Local Plan is identified as follows:

	Annual	Total
Local Plan Housing Requirement (Years 1-5 2024-2029)	400	2000
10% buffer	40	200
Total	**440**	**2200**

4. Housing Trajectory

4.1. The Local Plan is supported by a Housing Trajectory which sets out the housing which is projected to be delivered over the Local Plan period, broken down by year. This includes a windfall allowance of 100 dwellings per annum (adjusted in Years 1-2 to avoid double counting in relation to smaller developments).[19] The Housing Trajectory identifies a supply of **2405** dwellings for Years 1-5, representing a **5.5 year housing land supply** when measured against the requirement of 2200 dwellings. The following table provides a summary of the site-by-site breakdown of this figure, indicating the most advanced formal stage reached by each site within the planning system as of May 2023, and their status in relation to water neutrality requirements (e.g. '0' for developments which escape from water neutrality due to being outside the Sussex North Water Resource Zone or having detailed planning permission pre-dating the September 2021 Natural England Position Statement).

	Projected Housing Delivery 2024-29	Detailed Planning Permission/Prior Approval	Resolution to grant detailed planning permission	Outline permission	Existing Local Plan Allocation	Emerging Local Plan Allocation	Other (i.e. windfalls)	Subject to Water Neutrality requirements
Windfalls	498*						498	498

[19] The justification for the windfall allowance, and for including in within the 5 year housing land supply, is set out in the 2023 Crawley Windfall Statement.

	Projected Housing Delivery 2024-29	Detailed Planning Permission/Prior Approval	Resolution to grant detailed planning permission	Outline permission	Existing Local Plan Allocation	Emerging Local Plan Allocation	Other (i.e. windfalls)	Subject to Water Neutrality requirements
Identified small sites (1-4 dwellings) Years 1-2	2	2						0
Energy House, Hazelwick Avenue	40	40						40
Pacific House, Hazelwick Avenue	20	20						20
10 - 11 Queens Square	7	7						0
Hazelwood, Balcombe Road	5	5						0
7 - 13 The Broadway & 1 - 3 Queens Square	25					25		25
Breezehurst Drive Playing Fields	85		85					85**
Forge Wood Phase 4B	400			400				0
Former TSB Site, Russell Way	59		59					59

	Projected Housing Delivery 2024-29	Detailed Planning Permission/Prior Approval	Resolution to grant detailed planning permission	Outline permission	Existing Local Plan Allocation	Emerging Local Plan Allocation	Other (i.e. windfalls)	Subject to Water Neutrality requirements
Land East of Balcombe Road/Street Hill	15				15			0
Longley House, East Park	121		121					121**
Shaw House	7					7		7
St Catherine's Hospice, Malthouse Road	60					60		60
Tinsley Lane Playing Fields	120				120			120
Crawley Station & Car Parks	308		308					308
Telford Place / Haslett Avenue	285				285			285
Land N of the Boulevard	182			182				182
Ambulance Station, Ifield Avenue	39		39					39
Pinnacle, Station Way	44	44						44

	Projected Housing Delivery 2024-29	Detailed Planning Permission/Prior Approval	Resolution to grant detailed planning permission	Outline permission	Existing Local Plan Allocation	Emerging Local Plan Allocation	Other (i.e. windfalls)	Subject to Water Neutrality requirements
The Gables Nursing Home, Ifield Green	2	2						0
Oakhurst Grange	81	81						0
Total	2405	201	612	582	420	92	498	1893
Proportion of Total	100%	8%	25%	24%	17%	4%	21%	79%

* The 500-dwelling windfall allowance (100 dwellings per annum) is reduced by 2 to avoid double counting, since 2 dwellings on permissioned small sites are included separately.
** The required offsets have already been secured through the CBC scheme.

5. Site-by-site assessment

5.1. The following table sets out in summary on a site-by-site basis the justification for the inclusion of each site within the proposed 5 year housing land supply, with reference to other documents as needed. It is followed by development trajectory Pro-formas relating to a number of the identified sites which were provided by site promoters in the summer of 2021, in response to an enquiry from the council. They are preceded by an example of blank template. The pro-forma responses predate the water neutrality requirement which has caused delays with most sites, and have, to that extent, been superseded. They are, however, presented as evidence of engagement with developers as part of the Plan making process, and as an indication that – on the basis of the proposed policy approach for addressing the water neutrality issue – there is a realistic prospect that development will take place in Years 1 to 5 of the Local Plan.

Site Address	Planning Reference (where relevant)	Net additional dwellings projected 2024-29	Commentary
Windfalls	N/A	493	See Windfall Statement for justification of this allowance.
Identified small sites (1-4 dwellings) Years 1-2	Various (detailed in section B of SHLAA)	7	This figure is based on assumed build-out of permissioned sites on following basis (with a discount rate of 55% for uncommenced sites): Commenced sites: 50% of outstanding dwellings in year 1 (2022/3); 30% in year 2 (2023/4); 20% in year 3 (2024/5) Uncommenced sites: 15% of outstanding dwellings in year 1 (2022/3); 15% in year 2 (2023/4); 10% in year 3 (2024/5); 5% in year 4 (2025/26) – i.e. 45% in total.
Energy House, Hazelwick Avenue, Three Bridges, Crawley	CR/2021/0452/PA3 (granted 10/08/21)	40	The site benefits from prior approval for change of use from office to residential use and is uncommenced as of March 2023. The development would likely need to satisfy water neutrality requirements, although water consumption of new development would be partly offset by existing water usage.
Pacific House, Hazelwick Avenue, Three Bridges, Crawley	CR/2021/0455/PA3 (granted 10/08/21)	20	The site benefits from prior approval for change of use from office to residential use and is uncommenced as of March 2023. The development would likely need to satisfy water neutrality requirements, although water consumption of new development would be partly offset by existing water usage.
10 - 11 Queens Square, Northgate, Crawley	CR/2020/0113/FUL (granted 11/08/21)	7	The site benefits from detailed planning permission predating the Natural England position statement in

Site Address	Planning Reference (where relevant)	Net additional dwellings projected 2024-29	Commentary
			respect of Water Neutrality. The development had commenced by the end of March 2023.
Hazelwood, Balcombe Road, Pound Hill, Crawley	CR/2020/0762/FUL (granted 10/09/21)	5	The site benefits from detailed planning permission predating the Natural England position statement in respect of Water Neutrality. The development remained uncommenced at the end of March 2023.
7 - 13 The Broadway & 1 - 3 Queens Square, Northgate, Crawley	N/A	25	The development permitted under an earlier permission (CR/2015/0694/FUL) was implemented following expiry of the permission, and requires regularisation. The site is included as an allocation for residential development in the draft Local Plan. The physical works are complete.
Breezehurst Drive Playing Fields, Bewbush, Crawley	CR/2020/0192/RG3 (pending determination)	85	This development on council-owned land benefits from a resolution (08/02/2021) to grant planning permission subject to conclusion of a S106 agreement, with a further committee resolution on (30/08/2022) specifically responding to the issue of Water Neutrality. Water offsetting credits have been secured against this scheme through the retrofitting of CBC-owned properties and detailed permission is expected to be issued in spring 2023. The site is allocated as a housing and open space site in the adopted (2015) and draft Local Plan (2024) and is subject to a Development Brief which was adopted in 2018.

Site Address	Planning Reference (where relevant)	Net additional dwellings projected 2024-29	Commentary
Forge Wood Phase 4B, Forge Wood, Crawley	CR/2015/0552/NCC (outline – granted 15/11/2016) CR/2017/0128/ARM (pending determination)	400	This development benefits from outline consent and the reserved matters application is pending determination, with some design matters remaining to be agreed. The development represents the final sub-phase of the Forge Wood Masterplan, which is otherwise mainly complete. It formed part of the Forge Wood Neighbourhood allocation in the adopted (2015) Local Plan and is retained as an allocation in the draft Local Plan (2024). The site falls outside the Sussex North WRZ so it not affected by water neutrality, although earlier uncertainty regarding the extent of the WRZ caused some delay.
Former TSB Site, Russell Way, Three Bridges, Crawley	CR/2020/0037/FUL (pending determination)	59	The development benefits from a resolution (08/02/2021) to grant planning permission subject to conclusion of a S106 agreement. The conclusion of this has been delayed by the water neutrality issue. The site is allocated for housing development in the adopted (2015) and draft Local Plan (2024).
Land East of Street Hill, Maidenbower, Crawley	N/A	15	The site is allocated as a Housing, Heritage and Biodiversity site in the adopted (2015) and draft Local Plan (2024), subject to requirements which are to be set out in a Development Brief. Consultation on a draft Development Brief for the allocation took place in 2017 and 2018. The site falls outside the Sussex North Water Resource Zone.

Site Address	Planning Reference (where relevant)	Net additional dwellings projected 2024-29	Commentary
Longley House, East Park, Southgate, Crawley	CR/2020/0024/FUL (pending determination)	121	This development comprising 100% affordable housing benefits from a resolution (03/11/2020) to grant planning permission subject to conclusion of a S106 agreement, with a further committee resolution on (30/08/2022) specifically responding to the issue of Water Neutrality. Water offsetting credits have been secured against this scheme through the retrofitting of CBC-owned properties and detailed permission is expected to be issued in spring 2023.
Shaw House, West Green, Crawley	N/A	7	The site previously benefitted from prior approval (CR/2016/0816/PA3) for change of use from office to residential use as 26 flats, as well as permission for an additional storey containing 7 flats (CR/2014/0811/FUL). Works to implement the change of use commenced on site, but were not completed within the 3-year period required by the terms of this permitted development right. Physical works to implement the change of use (but seemingly not the upward extension) were completed in early 2021 but the development requires regularisation from a planning perspective, and would be subject to water neutrality requirements as part of this. The site is included as an allocation for residential development in the draft Local Plan. The 7 dwellings projected for the period 2024-29 represent the previously permitted

Site Address	Planning Reference (where relevant)	Net additional dwellings projected 2024-29	Commentary
			additional storey, on the assumption that the 26-flat conversion scheme will be regularised during 2023/24, with the extension following later.
St Catherine's Hospice, Malthouse Road, Southgate, Crawley	N/A	60	This site is proposed for allocation in the draft Local Plan 2024 as 'Housing for Older People and those with Disabilities'. It is being released by the relocation of the hospice to a new site in Pease Pottage, and is being actively promoted as a residential site. The new hospice building is currently under construction and due to open at the end of 2023.
Tinsley Lane Playing Fields, Three Bridges, Crawley	CR/2021/0355/OUT (pending determination)	120	This Homes England-owned site is allocated as a housing and open space site in the adopted (2015) and draft Local Plan (2024), and is subject to a Development Brief which was adopted in 2017. An application for outline consent is currently pending determination, but the progress of this has been delayed by the water neutrality issue.
Crawley Station & Car Parks, Northgate, Crawley	CR/2016/0294/OUT (granted 16 August 2016) CR/2019/0602/ARM (pending determination) CR/2019/0660/FUL	308	This site is allocated as a Key Town Centre Opportunity site in the adopted (2015) and draft Local Plan (2024), and forms the key focus of the Station Gateway scheme, forming part of the Crawley Growth Programme, and will unlock additional public funding for public realm works and sustainable transport infrastructure. The scheme benefits from outline consent and a reserved matters application and additional detailed planning application

Site Address	Planning Reference (where relevant)	Net additional dwellings projected 2024-29	Commentary
	(pending determination)		benefit from a resolution (26/04/2021) to grant planning permission subject to S106 agreements, although the conclusion of these has been delayed by the water neutrality issue. The new station within Overline House opened in early 2023.
Telford Place / Haslett Avenue, Three Bridges, Crawley	N/A	285	This council-owned site has most recently been in temporary use as a car park and is allocated as a Key Town Centre Opportunity site in the adopted (2015) and draft Local Plan (2024). It has been awarded £2m from the government's Housing Infrastructure Fund (HIF). An agreement with the Affordable Housing and Healthcare Group (AHH) for the sale and development of the site was announced at the beginning of 2023 and an outline application for c.300 dwellings is expected to be submitted in spring 2023, with delivery projected for 2026/27. The wider area of the allocation has capacity for additional development which is reflected in the projection of a further 95 dwellings in 2029/30 (i.e. beyond Years 1 to 5).
Land North of the Boulevard (Town Hall)	CR/2017/0997/OUT (granted 14/02/2019) CR/2022/0070/ARM (pending determination)	182	Land North of the Boulevard is allocated as a Key Town Centre Opportunity site in the adopted (2015) and draft Local Plan (2024). The scheme benefits from a hybrid planning permission, with the erection of a new Civic Centre and Office Building on part of the former Town Hall site having been completed. The Reserved Matters

Site Address	Planning Reference (where relevant)	Net additional dwellings projected 2024-29	Commentary
			application for the new residential building on the remainder of the site is currently pending determination. Additionally, the site is home to a new gas-fired combined heat and power energy centre, approved under application CR/2018/0139/FUL, which is now operational and providing energy to the new office building and new adjacent housing developments.
Ambulance Station, Ifield Avenue, West Green, Crawley	CR/2020/0274/FUL (pending determination)	39	This site benefits from a resolution to grant planning permission subject to the conclusion of a S106 agreement, but the conclusion of this has been delayed by the water neutrality issue.
Pinnacle, Station Way, Northgate, Crawley	CR/2021/0537/PA3 (granted 01/12/21)	44	The site benefits from prior approval for change of use from office to residential use and is uncommenced as of March 2023. The development would need to satisfy water neutrality requirements, although water consumption of new development would be partly offset by existing water usage.
The Gables Nursing Home, Ifield Green, Ifield, Crawley	CR/2019/0322/FUL (granted 21/07/2023)	2 (i.e. net increase of 4 bedrooms divided by 1.8)	The site benefits from detailed planning permission predating the Natural England position statement in respect of Water Neutrality. The development is uncommenced as of March 2023.
Oakhurst Grange, Southgate, Crawley	CR/2016/0972/FUL (granted 05/10/18)	81 (i.e. 146 bedrooms divided by 1.8)	The site benefits from detailed planning permission predating the Natural England position statement in respect of Water Neutrality, which was commenced by the

Site Address	Planning Reference (where relevant)	Net additional dwellings projected 2024-29	Commentary
			demolition of existing buildings on the site. An amended planning application is expected to be received in the spring of 2023.

2021 Pro formas

Pro forma template example

Timing

Time Period (years running from 1 April - 31 March)		Projected Housing Delivery on Site
2020-26	2020/21	
	2021/22	
	2022/23	
	2023/24	
	2024/25	
	2025/26	
2026-31		
2031-2036		

Supporting Evidence

Issue	**Comments/ Evidence**
Current Planning Status (including progress towards approval of reserved matters, where relevant)	
Progress towards the submission of an application	
Progress with site assessment work	
Site viability	
Ownership constraints	
Infrastructure provision (including successful bids for large-scale funding)	
Other	

Breezehurst Drive Playing Fields, Bewbush, Crawley

Provided by Mr Russell Allison, Housing Enabling and Development Manager, Crawley Borough Council, 26/08/2021

Timing

Time Period (years running from 1 April - 31 March)		Projected Housing Delivery on Site
2021-26	2021/22	
	2022/23	
	2023/24	85
	2024/25	
	2025/26	
2026-31		
2031-37		

Supporting Evidence

Issue	**Comments/ Evidence**
Current Planning Status (including progress towards approval of reserved matters, where relevant)	Planning approved, S106 pending signing, conditions to be discharged by contractor following JR stand-still period.
Progress towards the submission of an application	As above
Progress with site assessment work	Surveys completed
Site viability	No viability concerns, Council-funded scheme, although building materials have risen by c.10% in recent months
Ownership constraints	Council-owned land, no constraints other than S106 obligations with Sports England
Infrastructure provision (including successful bids for large-scale funding)	Acoustic mitigation designed into the scheme
Other	This scheme will be 100% affordable with 70% rental and 30% shared-ownership.

Land East of Street Hill, Maidenbower, Crawley

Provided by Mr Tony Fullwood, Tony Fullwood Associates, 12/08/2021

Timing

Time Period (years running from 1 April - 31 March)		Projected Housing Delivery on Site
2021-26	2021/22	
	2022/23	
	2023/24	
	2024/25	X
	2025/26	
2026-31		
2031-37		

Supporting Evidence

Issue	**Comments/ Evidence**
Current Planning Status (including progress towards approval of reserved matters, where relevant)	The site is allocated in the adopted Crawley Local Plan and is awaiting the approval of a revised Development Brief by the Borough Council.
Progress towards the submission of an application	Awaiting the approval of a revised Development Brief by the Borough Council.
Progress with site assessment work	Phase 1 Habitat Survey, Archaeological Assessment; Heritage Appraisal and Highway Access Report all completed.
Site viability	
Ownership constraints	The site is entirely within the ownership of my client and there are no ownership constraints to bringing the site forward.
Infrastructure provision (including successful bids for large-scale funding)	There are no infrastructure constraints with highway access available direct to the adopted highway.
Other	

Forge Wood Phase 4B, Forge Wood, Crawley
Provided by Mr Robert Clark, Land and Planning Director, Persimmon Homes, 09/08/2021

Timing

Time Period (years running from 1 April - 31 March)		Projected Housing Delivery on Site
2021-26	2021/22	
	2022/23	30
	2023/24	60
	2024/25	60
	2025/26	60
2026-31		224
2031-37		

Supporting Evidence

Issue	Comments/ Evidence
Current Planning Status (including progress towards approval of reserved matters, where relevant)	The RM application for Phase 4B (434 units) has been submitted. This should go to the October 2021 planning committee.
Progress towards the submission of an application	The phase 4b application has been submitted.
Progress with site assessment work	All site assessment work complete.
Site viability	No issues
Ownership constraints	No issues
Infrastructure provision (including successful bids for large-scale funding)	The scheme can be delivered
Other	

Longley House, East Park, Southgate, Crawley

Provided by Mr Henry Courtier, Director, Pegasus Group, 19/08/2021

Timing

Time Period (years running from 1 April - 31 March)		Projected Housing Delivery on Site
2021-26	2021/22	
	2022/23	
	2023/24	121
	2024/25	
	2025/26	
2026-31		
2031-37		

Supporting Evidence

Issue	**Comments/ Evidence**
Current Planning Status (including progress towards approval of reserved matters, where relevant)	Resolution to grant secured at Planning Committee in November 2020. S106 Agreement being finalised to enable issue of decision.
Progress towards the submission of an application	N/A
Progress with site assessment work	Developer (A2Dominion) undertaken necessary pre-commencement surveys. All being well, works are expected to start onsite in October 2021 and then there will be a 24 month build programme. Therefore complete in Nov 2023.
Site viability	N/A
Ownership constraints	None
Infrastructure provision (including successful bids for large-scale funding)	Funding largely secured. Awaiting issue of planning decision.
Other	

Crawley Station & Car Parks, Northgate, Crawley

Provided by Mr Tim Jurdon, Head of Planning, Arora Management Services Ltd, 03/08/2021

Sorry that I have not been able to predict our delivery timescales below but we have consistently run into headwinds with this complex project that we hoped would be well underway some considerable time ago.

Railway related issues have been the principle cause but so too the complexity of this brownfield site and marginal viability of the scheme. Our next hurdle is to see a draft S106 agreement which has been taking some time.

What I can say is that we are committed to the development and should deliver by 2025/26 assuming relatively smooth progress going forward.

Supporting Evidence

Issue	Comments/ Evidence
Current Planning Status (including progress towards approval of reserved matters, where relevant)	Awaiting 1st draft of S106 agreements required to secure planning permissions that have previously been resolved to grant.
Progress towards the submission of an application	N/A
Progress with site assessment work	N/A
Site viability	Marginal
Ownership constraints	N/A
Infrastructure provision (including successful bids for large-scale funding)	LEP funding secured for related public realm enhancement works to be implemented by CBC.
Other	

Telford Place / Haslett Avenue, Three Bridges, Crawley

Provided by Mr Russell Allison, Housing Enabling and Development Manager, Crawley Borough Council, 26/08/2021

Timing

Time Period (years running from 1 April - 31 March)		Projected Housing Delivery on Site
2021-26	2021/22	
	2022/23	
	2023/24	
	2024/25	c.300
	2025/26	
2026-31		
2031-37		

Supporting evidence

Issue	**Comments/ Evidence**
Current Planning Status (including progress towards approval of reserved matters, where relevant)	Pre-apps yet to commence, anticipate submitting planning application early-2022
Progress towards the submission of an application	Initial designs underway, pre-apps to follow once contracts are exchanged following procurement outcome
Progress with site assessment work	Previous site surveys will need updating
Site viability	The investment model being considered improves scheme viability but the actual build costs will determine this once tendered
Ownership constraints	Homes England claw-back restriction on highways land that is to be stopped-up
Infrastructure provision (including successful bids for large-scale funding)	Highways works, public realm works and site remediation works will be a cost to the scheme, although HIF funding available if scheme remains marginally viable.
Other	Potential for this scheme to be 100% affordable housing with min. 28% rental and max. 72% shared-ownership (c.50% for over-55's), subject to successfully concluding the procurement procedures.

Appendix B: Additional Commentary on September 2022 base date Strategic Housing Land Availability Assessment

1. The March 2023 Housing Trajectory includes a small number of changes to projected housing sites and their rate of build-out as compared with the Strategic Housing Land Availability Assessment (base date 30 September 2022). These are set out in the table below.

Site	SHLAA Category	SHLAA Site Ref	Commentary on changes from September 2022 base date SHLAA to March 2023 Housing Trajectory
8-9 Queens Square, Northgate, Crawley	A	3	Projected delivery of 7 dwellings moved from 2022/23 to 2023/24
Belgrave House, Station Way, Northgate, Crawley	A	47	Projected delivery of 41 dwellings moved from 2022/23 to 2023/24
Hazelwood, Balcombe Road, Pound Hill, Crawley	A	63	Projected delivery of 5 dwellings moved from 2023/24 to 2024/25
1 - 2 The Courtyard, East Park, Southgate, Crawley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commenced' site
151 London Road, Langley Green, Crawley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commenced' site
43 Mill Road, Three Bridges, Crawley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commenced' site
44 Albany Road, West Green, Crawley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commenced' site
9 -11 East Park, Southgate, Crawley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commenced' site
Fairhaven, Fernhill Road, Forge Wood, Horley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commenced' site
Oakleigh, Church Road, Pound Hill, Crawley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commenced' site
R/O 3 Southgate Road, Southgate, Crawley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commenced' site
R/O 5-9 Southgate Road,	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commenced' site

Southgate, Crawley			
7 East Park, Southgate, Crawley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commitment' site
1-6 Maunsell Park, Pound Hill, Crawley	B	N/A	Site removed from 'commitments' due to expiry of permission
Ewhurst, The Mardens, Ifield, Crawley	B	N/A	Site removed from 'commitments' due to expiry of permission
First Floor, 174 Three Bridges Road, Three Bridges, Crawley	B	N/A	Site counted towards 2022/23 small-site completions rather than as a 'commitment' site
Land North of the Tweed, Tweed Lane, Ifield, Crawley	B	N/A	New 'commenced' site: gross 1; losses 0; net 1
The Wyatts Two, Radford Road, Forge Wood, Crawley	B	N/A	New 'commitment' site: gross 1; losses 1; net 0
Steers Lane (Consented Site)	C	17	Delivery for 2022/23 reduced from 90 to 14 dwellings; projected delivery for 2023/24 increased from 95 to 171 dwellings.

2. Subsequent to the Housing Trajectory base date of 31 March 2023, on 3 April 2023, the Crawley Borough Council Planning Committee resolved to grant planning permission to application no. CR/2022/0055/FUL subject to the conclusion of a S106 agreement. This application relates to SHLAA site 99 'Land at Steers Lane (residual site)', and is for 'Erection of 60 dwellings including associated parking, landscaping and infrastructure works (amended plans & documents received)'.

3. The SHLAA identifies this site as unsuitable for residential development on noise grounds, both in relation to Policy ENV11 in the adopted Local Plan and Policy EP4 of the submission Local Plan 2024. The officer report recommending the application for approval included consideration of noise impacts but concluded that it was acceptable from a noise perspective on the basis of updated noise contours. Even under the updated contours the site would be subject to a level of aviation noise that would be in conflict with emerging Policy EP4, meaning that there is the possibility that the site may be found unsuitable for residential development in the event that the principle of development comes to be revisited.

4. Given the background and the sequence described above the site is not identified in the Submission Local Plan 2024 or the Housing Trajectory dated 31 March 2023, but can be counted towards the identified windfall allowance of 100 dwellings per annum.

Appendix C: Comparison of successive iterations of Crawley Borough Housing Supply 2015-40

The table below compares successive Plan iterations in terms of total net housing delivery projected over the period 2015-40 (i.e. the period from year 1 of the adopted 2015 plan and year 16 of the proposed updated Plan). Totals for each iteration represent a combination of Local Plan requirement figures (for the proposed Local Plan period in each case); rolled forward windfall projections for post-plan years (where appropriate); actual delivery; and Housing Trajectory projections (i.e. for pre-plan years which were in the future or where total housing delivery was yet to be confirmed at the point of plan publication).

It will be seen that according to this measurement total projected housing delivery has increased with each iteration, as additional sources of supply have been identified.

	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	2034/2035	2035/2036	2036/2037	2037/2038	2038/2039	2039/2040	Total 2015-2040
2015 Local Plan	340	340	340	340	340	340	340	340	340	340	340	340	340	340	340	55	55	55	55	55	55	55	55	55	55	5650
2019 Reg 18	541	596	369	342	940	451	451	451	451	451	255	255	255	255	255	255	255	255	255	255	55	55	55	55	55	7868
2020 Reg 19	541	596	369	512	431	500	500	500	500	500	450	450	450	450	450	121	121	121	121	121	55	55	55	55	55	8079
2021 Reg 19	541	596	369	512	404	740	350	350	350	350	350	450	450	450	450	450	220	220	220	220	220	220	90	90	90	8752
2023 Reg 19	541	596	369	512	404	568	356	170	324	400	400	400	400	400	360	360	360	360	360	205	205	205	205	205	205	8870

Key	
	Local Plan Requirement
	Actual Net Delivery
	Housing Trajectory Projection
	Roll forwards of Local Plan windfall