

ECONOMIC AND ENVIRONMENTAL SERVICES



Contact: Mrs J. McPherson
Direct Line: (01293) 438577
Direct Fax: (01293) 438495

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Email: development.control@crawley.gov.uk
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Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL
FAO Dr Chris Lyons

Dear Sir

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: CONSULATION FROM HORSHAM DISTRICT COUNCIL (DC/17/2481) FOR OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF APPROX 227 DWELLINGS WITH THE CONSTRUCTION OF A NEW ACCESS FROM CALVERT LINK, A PUMPING STATION AND ASSOCIATED AMENITY SPACE (ALL MATTERS RESERVED EXCEPT FOR ACCESS). LOCATION: LAND TO THE WEST OF PHASE 1 KILNWOOD VALE, CRAWLEY ROAD, FAYGATE

Thank you for consulting Crawley Borough Council on the above application.

The application site is land to the west of Phase 1 Kilnwood Vale and is the 'Reserve Land' which is required to be safeguarded in the event a relief road is needed to serve further development West of Crawley. The proposal which is in outline seeks planning permission for residential development of around 227 dwellings with associated infrastructure with details of means of access only (and all other matters reserved).

The site is covered by policy WB23 in the West of Bewbush Joint Area Action Plan 2009 which remains part of the development plan as confirmed by paragraph 1.1 of the Horsham District Planning Framework (2015), and which states:

Western Relief Road

Land required for a Western Relief Road will be safeguarded from the neighbourhood's primary junction with the A264 through the allocated site until it has been determined whether such a route will be necessary to serve further development West of Crawley, or to meet wider sub regional objectives.

Crawley Borough Council consider that the delivery of a full western relief road is an essential requirement to mitigate the severe road congestion which is currently experienced on the strategic road network on the western side of the town. Whilst the Transport Assessment for Kilnwood Vale did not consider a relief road was necessary for that development, the JAAP in its Longer Term section, Policy WB27 and supporting text, highlights the possibility of future longer development west of Crawley, if future assessments indicate further development in this location is the most appropriate and sustainable location for delivery of necessary development. Policy WB27 states that the HDC and CBC Core Strategy Reviews will establish whether there should be a further neighbourhood within or adjacent to Crawley, and Crawley's Core Strategy Review resulted in the Crawley Borough Local Plan 2015-2030 which recognises, in Policy H1 that "There will be a remaining unmet housing need, of approximately 5,000 dwellings, arising from Crawley over the Plan period. The council will continue to



Switchboard: 01293 438000
Main fax: 01293 511803
Minicom: 01293 405202
DX: 57139 Crawley 1
www.crawley.gov.uk

Town Hall
The Boulevard
Crawley
West Sussex
RH10 1UZ

work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley.”

Further development on the western side of Crawley was promoted by landowners through the Horsham District Planning Framework process and, although not considered necessary for that Plan, it will be necessary to explore again in the light of increasing need within Horsham and unmet needs in Crawley when the HPDF is reviewed, as set out by the Inspector in his report on the Examination into the Horsham District Planning Framework (October 2015), paragraphs 51-53 and 80. Therefore, release of this land at this stage is considered to be premature and will undermine a plan-led longer term approach recognised in the JAAP, and in the Crawley Borough Local Plan.

The release of this land and the additional development in this proposal would add further strain on the infrastructure provision within Crawley in particular the A2220/A23 roundabout and the roads to the west of the town centre. The roundabout from the A264 into Kilnwood Vale has been designed with the capacity to be extended to form the western junction of a relief road onto the A264 and the loss of this key junction would result in further incursion into the countryside between Crawley and Horsham if, at some later date, a relief road was deemed necessary to support another planned extension to the West of Crawley. This would lead to increased visual coalescence between Crawley and Horsham and add further infrastructure costs to any further development from any subsequent relief road scheme.

Crawley Borough Council therefore **OBJECT** in principle to the loss of this reserve land as it is contrary to policy WB23 and WB27 in the JAAP as there is no evidence provided that this route would not be necessary to serve further development that may come forward West of Crawley

While the application is outline only CBC wish to make the following comments on the proposal in the event HDC are minded to permit the scheme.

- Affordable housing – The site must ensure 40% affordable housing is delivered in the required tenure mix as was the requirement if the reserve site were released for residential. CBC would expect to receive 50% of the nomination rights for the affordable units as for the rest of Kilnwood Vale neighbourhood.
- The development is close to the A264 and there is concern that the houses at the southern end of the site would be subject to traffic noise. The layout of the site must ensure that a satisfactory environment is provided for future occupants and they are not subject to unacceptable noise levels. There is therefore concern that the density parameter plan shows the highest density development in the southern part of the site which is most affected by road noise, this approach should be reconsidered.
- The site is visually intrusive within the wider landscape and requires robust landscaping to effectively screen the development from views approaching Crawley on the A264. There is concern about visual coalescence between settlements.
- The development should be legible with the rest of Kilnwood Vale and should ensure that the dwellings are designed to be tenure blind. CBC would wish the applicants to ensure that the houses meet the Nationally Described Space standards and have adequate provision for outdoor amenity space (in line with the advice in this Council's Urban Design SPD). In particular, it is important that affordable houses have sufficient outdoor amenity space as these houses, unlike many private units, will be fully occupied and occupants have no choice over whether or not they have access to a suitable sized garden.

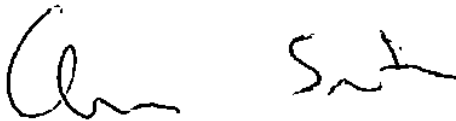
If permitted, the site should be considered as part of Kilnwood Vale neighbourhood and a proportional increase in infrastructure contributions to mitigate the additional impact on Crawley infrastructure, in particular the highway network, should be sought. The WSCC Strategic Infrastructure Plan for Crawley identifies the upgrade of the A2220/A23 roundabout to a fully signalised junction as necessary mitigation for Kilnwood Vale. However, this is only part-funded by the S106 linked to the Kilnwood Vale application DC/10/1612 (triggered at 2,100 occupations) and, as this development if approved, would

increase pressure on this already congested roundabout, a contribution towards this funding gap would be appropriate.

Community Infrastructure Levy contributions secured from this development should also be directed towards facilities which will be used by its new residents. This would include a new medical centre in Bewbush, which is already significantly overcapacity but is having to support residents from Kilnwood Vale. This is identified as a priority project in the CBC CIL Infrastructure Business Plan, and a contribution from the CIL from this development would enable it to be brought forward earlier. Also, the need to expand existing secondary school places in the Crawley Locality is recognised in the WSCC SIP, with Kilnwood Vale/Colgate specifically identified as contributing to a need to expand from 48FE to 52FE. A formula based S106 contribution towards this was secured from DC/10/1612, but funding for Education is also being identified in the CBC CIL Infrastructure Business Plan, and a contribution from the CIL secured from this development would help deliver increased school places to mitigate the impact the development will have.

For the reasons set out above, Crawley Borough Council **OBJECT** to the application.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Clem Smith', written in a cursive style.

Clem Smith
Head of Economic and Environmental Services