



Crawley 2035

Ref No:

Office use only

Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council
by 5pm on 2 March 2020.

Representations can be made via this form and emailed to forward.planning@ Crawley.gov.uk or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client's name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at www.crawley.gov.uk/privacy. Specific reference to the Local Plan and planning policy related public consultation can be found on: www.crawley.gov.uk/pw/web/PUB351893

PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple "PART B" sections with a single "PART A" completed.

PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

1. Personal details

Title:
First name:
Surname:
Organisation: Homes England c/o Agent
Address line 1:

2. Agent's details

Mr
Stuart
Williamson
Wood Plc
Nicholls House

Address line 2:

Homer Close

Town/city:

Leamington Spa

Postcode:

CV34 6TT

Telephone:

01926 439054

Email:

Stuart.williamson@woodplc.com

PART B – Your representation

3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

4. Which part of the Local Plan does this representation relate to?

Paragraph:

Policy:

Other:

5. Do you consider the Local Plan to be: (Please tick)

5.1. Legally compliant?

Yes

No

5.2. Sound?

Yes

No (Policy HI)

5.3. Compliant with the duty to co-operate?

Yes

No

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

Please see attached response.

If required, please continue your response on an additional piece of paper and securely attach it to this response

- 7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.**

Please see attached response.

If required, please continue your response on an additional piece of paper and securely attach it to this response

Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:

A significant landowner of a site in Tinsley Lane, that is allocated under Policy H2.

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/crawley2035

Signature



Date

28/2/2020

Crawley Local Plan Review:

Response on behalf of Homes England

1. Introduction

Wood is retained by Homes England to respond to the Crawley Borough Local Plan 2020 – 2035 consultation draft on its behalf, particularly with regard to its land interest at Tinsley Lane, Crawley. The site is allocated in Policy H2 of the adopted Local Plan and draft Policy H2 of the Local Plan review to deliver new homes. An outline planning application for the site was submitted in 2018 seeking permission for up to 150 homes. This application is currently being considered by the Borough Council (reference CR/2018/0544/OUT). The representation below confirms that the site remains available and deliverable. Homes England intends to dispose of the site soon after planning permission is granted and therefore the site will come forward in the short term to deliver homes and boost supply. However, given the current undersupply of homes in the borough, there is a pressing need to ensure that development at Tinsley Lane makes an efficient use of the site in line with guidance in the NPPF. Homes England has robustly tested the capacity of the site through the preparation of the outline planning application and considers that 150 homes rather than 120 homes as stated in the adopted and draft Policy H2 are achievable on the site. Accordingly, in order to make an efficient use of this sustainable site and contribute to boosting supply, it is considered that the Policy should be amended to recognise that 150 homes can be delivered.

2. Strategic Policy H1: Housing Provision

To support the Government's objective of significantly boosting the supply of homes, the Local Plan will need to ensure that a sufficient amount of land can come forward to meet housing needs and ensure that land that is allocated and subsequently developed without unnecessary delay.

The Council's evidence suggests that there is significant upward pressure on housing need which the Local Plan review will need to address. Paragraph 60 of the NPPF states that in determining the number of homes in strategic plans, the level of housing provision should be based on the standard methodology set out in national planning guidance.

The Government's Standard Methodology for calculating housing need identifies a significant requirement of 752dpa which over a new plan period of 2020 to 2035 would be 11,280 dwellings. However, given the constrained nature of Borough of Crawley, the emerging Local Plan only makes provision for the development of a minimum of 5,355 net dwellings in the borough in the period 2020 to 2035. The Plan will deliver an average of 500 dwellings per annum (dpa) until 2024/25. Thereafter an average of 450dpa will be delivered between 2025/30 and 121dpa between 2030/35. This level of provision is significantly below the level required to meet the Local Housing Need (752dpa).

The Council does not consider this the whole requirement over the plan period can be met within the borough and subsequently they are in discussions with neighbouring authorities about meeting some of this unmet need. Taking into account existing commitments, the Council estimates that the scale of unmet need is approximately 5,925 dwellings over the Plan period.

Given the emphasis of the NPPF to significantly boost the supply of housing in addition to guidance at paragraph 122 of the NPPF which states that planning policies and decisions should support development that makes efficient use of land, the emphasis should be on maximising the number of dwellings which could be accommodated on all sites, particularly existing allocations in order to boost supply.

As noted above, Homes England's land at Tinsley Lane is allocated in policy H2 of the current adopted Plan. Although Policy H2 identifies the site as being suitable for 120 new homes, the allocation wording notes this is an indicative figure. The housing figures in the Local Plan are expressed as minimum figures. Policy H1 states that *"The Local Plan makes provision for the development of a minimum of 5,100 net dwellings in the borough in the period 2015 to 2030"*.

Furthermore, in considering the adopted Local Plan, the Inspector acknowledged that a higher figure (138 dwellings) may be achievable *'if at detailed design stage the northern field is found to have the capacity to deliver the full range of playing pitch facilities.'* (Page 13 para 44 Inspector's Report into the Examination of the Crawley Local Plan).

Wood has prepared an evidence base of technical reports to demonstrate the suitability of land at Tinsley Lane through the preparation of the outline planning application submitted to Crawley Borough Council (Reference CR/2018/0544/OUT). This included transport, landscape, biodiversity and drainage/flood risk assessments. They demonstrate the suitability of this location, which can deliver a greater quantum of development than is currently identified in Policy H2. The illustrative masterplan submitted with the outline planning application demonstrates that 150 units can be accommodated on the central and southern land parcels with new football facilities being located on the northern parcel.

Summary: we have outlined some suggestions below for the inclusion in Policy H1 in order to support the objective of maintaining a housing supply and assist in delivering a sound plan:

1. **Sustainable development proposals will be approved without delay:** In line with paragraph 11 of the NPPF, a clear presumption in favour of sustainable development should be applied. Development proposals that accord with the development plan should be approved without delay to enable sites such as Tinsley Lane to come forward quickly and boost supply.
2. **Development proposals should make an efficient use of sites:** Guidance in the NPPF (paragraphs 122 and 123) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. The Council will therefore need to give consideration to policies which achieve the following:
 - a. Optimise the use of land to seek a significant uplift in average density of residential development.
 - b. Deliver minimum density standards.
 - c. Refuse applications which would not make an efficient use of land.

2.1 Strategic Policy H2: Key Housing Sites Land at Tinsley Lane

Homes England supports the inclusion land at Tinsley Lane being identified as housing site. Policy H2 of the adopted Local Plan and draft Local Plan include the Tinsley Lane as being suitable for 120 dwellings. As noted above, the allocation wording notes this is an indicative figure and Homes England considers the outline planning application demonstrates that the site can deliver 150 dwellings.

The submitted outline planning application proposals comply with the criteria in Policy H2 and development will provide a range of community benefits including new sports facilities and public access to Summersever Woods.

Homes England considers that this site has significant potential to assist the Council in meeting its development needs, hence the outline planning application. It provides a highly deliverable and developable location in line with guidance in the NPPF. In particular, the site is available now, it offers a suitable location for development and is achievable with a realistic prospect that housing could be delivered within five years. The site:

- Is not covered by any strategic constraints which would prevent development. It is flood zone 1 and has no other constraints that would preclude development.
- Presents a logical and sustainable location for new housing provision. It can deliver a quality development to assist in meeting the significant development needs in the Borough. It is an attractive location for new housing and would be likely to attract further market interest by national developers.
- The site is in single ownership of Home England who is willing to bring the land forward. The site can deliver quality development to assist in meeting the Local Plan requirement, including a mix of dwellings. Should the current outline planning application be approved, Homes England would market the site immediately to deliver homes in the short term.

Summary and suggested amendments to Policy H2: As outlined above the Tinsley Lane site is considered suitable and is deliverable. Homes England is progressing the site and there is an expectation that it will deliver homes within the next five years. However, in the above context of boosting supply and making an efficient use of sites (see comments on Policy H1) we suggest the policy wording should be changed to:

*Tinsley Lane, Three Bridges (deliverable) ~~420~~ 150 dwellings, mixed use recreation/residential.
Development of this site must include:*

- the replacement of Oakwood Football Club;*
- senior football pitch and facilities; iii. a junior 3G football pitch;*
- community use arrangements for the sports pitch facilities;*
- enhancement and management for public access of Summersever Woods;*
- on-site publicly accessible play space and amenity greenspace.*
- Consideration should also be given to the provision of allotments*