

23 June 2021

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[BY EMAIL]

Dear Sir/Madam,

**REGULATION 19 (PART 2) LOCAL PLAN REPRESENTATIONS
ST CATHERINE'S HOSPICE, CRAWLEY (SITE REFERENCE: 83)**

Please find enclosed representations on the Proposed Submission Draft Local Plan, submitted on behalf of our client, St Catherine's Hospice ('St Catherine's'). The Council will be aware that St Catherine's control land at St Catherine's Hospice, Malthouse Road, Crawley, which has been allocated for development within Strategic Policy H2 of the emerging Local Plan.

This representation highlights and where necessary expands upon representations submitted by St Catherine's at the previous Regulation 18 and Regulation 19 stages of the Local Plan process. The Hospice's Regulation 19 representations are appended to this letter for ease of reference and to save for unnecessary repetition.

Strategic Policy H2 allocates Malthouse Road for development, recognising the multiple benefits of redevelopment at this site. Whilst welcomed, it is considered that the proposed restrictions for elderly care (residential Class C3 use for older people and/or residential rooms as Class C2) placed on the site are overly prescriptive. It is St Catherine's position, as outlined within their previous representations, that additional flexibility should be provided in the wording of emerging Policy H2 to ensure that if there is demonstrable need, or a lack of demand in the market for elderly care in this location, the site can be redeveloped for C3 use.

The Site

As detailed within in earlier representations, whilst there are some constraints on the site, these are not considered significant enough to negatively affect the opportunities for a comprehensive development to come forward. It is considered that there are numerous opportunities across the site, owing to the existing access points and close proximity to the train station and town centre.

The illustrative masterplans appended to the previous Regulation 19 representation demonstrate that a comprehensive redevelopment, comprising either: a care facility of approximately 60-70 beds (use class C2); or, residential development of circa 60-70 dwellings (use class C3), could readily be delivered without prejudicing the existing urban grain. Both masterplan options demonstrate the capacity of the site to accommodate a higher density of development than currently identified in Draft Policy H2.

Commentary on the Evidence Base

The evidence which has been updated/ published since the submission of St Catherine's previous representation in March 2020 is has been referred to in this Representation where appropriate.

Strategic Housing Land Availability Assessment (September 2020)

Assessed under 'Site Reference 83', CBC acknowledge that the Land at Malthouse Road is available, suitable and achievable, highlighting that,

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'Subject to re-provision of hospice facilities elsewhere within the wider area. The site is located in a residential area in reasonable proximity to the town centre, and would in principle be suitable for residential development.'

St Catherine's concur with the Council's review of the site, sharing the opinion that due consideration will need to be made to the proposal's design response to Malthouse Road Conservation Area. However, as demonstrated in the illustrative masterplans appended to the previous representations, the site is capable of delivering up to 70 dwellings on the site. This should be reflected in the allocation, which should be positively worded to deliver a 'minimum of 60 dwellings'.

In addition, the assessment recognises the Hospice's intention to relocate the Hospice to Pease Pottage, outlining the Council's support for the redevelopment as the Local Planning Authority and part-landowner. However, there is little information available to support the proposed restrictions to 'housing for older people'.

This is contrary to Paragraph 31 of the NPPF, which outlines that [emphasis added] *'the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.'*

Whilst St Catherine's support the Council's preference for elderly care provision, it is important to recognise the influence of the market and enable some flexibility for unrestricted use on the site if an elderly care provider is not forthcoming.

Crawley Densification Study (January 2021)

The Council's Densification Study outlines how important it is that Crawley, as a borough, re-visits how its existing urban areas are used and organised, to enable existing land to be used more efficiently. This is particularly in regard to how the scale and layout of the existing built fabric could, or should, facilitate new compact forms of development within the Built-Up Area Boundary.

The Study outlines that there are no major Greenfield sites suitable for strategic residential development remaining within the borough's administrative boundaries after Forge Wood is completed. Therefore, any future development in the borough will have to be compact in order to make effective use of the land supply available.

As detailed in the following section, St Catherine's strongly supports the Council's proposals to introduce minimum density standards to targeted areas in Crawley (Strategic Policy CL5). Indeed, the NPPF is clear that in setting new policies, plans must contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible and that this should include the use of minimum density ranges. However, St Catherine's are of the mind that the findings of the Council's Densification Study have not been disseminated fully enough into the remainder of the Local Plan.

The illustrative masterplans appended to the previous representations demonstrate the ability of the site to comfortably accommodate 60-70 units i.e. a notably higher density of development than currently identified in Draft Policy H2.

It is well understood that Crawley is considerably constrained due to the limited land available in the Borough, as such, it is of paramount importance to maximise the development potential within, and close to, the Town Centre. The redevelopment of the Hospice will increase the density of accommodation provided on the site, whilst enhancing the setting of the neighbouring Conservation Area. This should be reflected in the allocation, which should be positively worded to deliver a minimum of 60 dwellings'.

Observations on the Local Plan Review - Regulation 19 (Part 2) Consultation

Strategic Policy CL4: Compact Development: Layout, Scale and Appearance

St Catherine's supports the proposed changes to the policy wording of Section 4, and commend the Council's

commitment to the principles of Compact Development, including the introduction of minimum density standards to targeted areas in Crawley.

Policy CL4 stipulates a minimum density range of 60-200 dwellings per hectare in areas of the town with good access to public transport and local facilities. As noted in the previous representation, St Catherine's Hospice is seeking to erect circa. 60-70 dwellings at a density of 96 dwelling per hectare (dph) at Malthouse Road, which accords with the emerging policy and demonstrates the capacity for the site to positively contribute towards housing supply in the Borough.

The requirements of Policy CL4 should, however, be more fully reflected in Policy H2, which should be positively re-worded to deliver a '**minimum of 60 dwellings**'.

Section 12: Housing Delivery

Strategic Policy H2: Key Housing Sites

St Catherine's Hospice would like to take this opportunity to reiterate their concerns about this policy, specifically, the respective rigidity in the policy wording. The previous representations have consistently highlighted the need for flexibility within Policy H2 to enable unrestricted C3 development at the site if a care provider is not forthcoming. This amendment to the policy would ensure the policy is effective and able to adapt where justified at the application stage via evidence of marketing or demonstrated need for general housing needs.

In accordance with the SHLAA assessment, Policy H2 should recognise that the re-provision of St Catherine's Hospice to Pease Pottage, circa. 2.5 miles from Malthouse Road, will not result in a net loss of infrastructure to the residents of Crawley.

As previously noted, the trustees at St Catherine's Hospice have an obligation under the Charities Commission to demonstrate best value within reasonable constraint and whilst St Catherine's have been gifted the land at Pease Pottage, St Catherine's still requires an adequate land receipt to contribute to building the new facility.

Significantly, the site is ideal for housing of a broad range of types, given its setting and proximity to good transport. We would not want to restrict usage at this stage, particularly when initial analysis shows that the site may only deliver marginal capacity to enable effective care home operation. As such, providing flexibility in the policy will attract the most market interest and ensure the earliest possible delivery of the site.

Therefore, we would like to reiterate our request that Strategic Policy H2 is reworded to allow higher densities at this location and ensure that if there is a lack of developer interest or demand in the market, the site can be redeveloped for unrestricted C3 use – As such, the following changes are recommended:

“[St Catherine's Hospice (developable) as residential Class C3 use for older people (minimum of 60 dwellings**) and/or residential rooms as Class C2 (Residential Home) use.**

Development on these sites should specifically meet the needs of older people, either as a care facility in the form of Extra-Care or Residential Care or to provide general housing designed to meet particular needs of older people including being wheelchair adapted dwellings meeting Building Regulations Part M, Category 3 accessibility standards] **unless it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or an evidenced need for unrestricted C3 use at the planning application stage.”**

This amendment to the policy would ensure the policy is effective, positively prepared and consistent with national policy (NPPF Paragraph 35).

Summary

This representation highlights and where necessary expands upon representations submitted by St Catherine's

at the previous Regulation 18 and Regulation 19 stages of the Local Plan process. St Catherine's supports the changes that have been made to certain policies as part of this current consultation exercise, however, it is maintained Policy H2 remains overly prescriptive and unless positively re-worded may delay the redevelopment of the site.

It is requested that Strategic Policy H2 is amended to provide additional flexibility to ensure that if there is a lack of developer interest and/or market demand, the site can be redeveloped for unrestricted C3 use. Allied to this, it is requested that Policy H2 should be positively re-worded to deliver a 'minimum of 60 dwellings' in order to reflect the density requirements of emerging Policy CL4.

Importantly, the requested amendments to Policy H2 will help St Catherine's to achieve adequate land receipts and help contribute to the building of the new facility at Pease Pottage by attracting the most market interest in the land. This will also ensure St Catherine's are able to demonstrate best value, required by the Charities Act, and ensure the earliest possible delivery of the site.

Ultimately, the allocation of the site at St Catherine's Hospice is supported, and should remain in the emerging Local Plan for development for residential Class C3 use for older people and/or residential rooms as Class C2, with flexibility to bring forward unrestricted residential dwellings (use class C3) if it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage.

In our earlier representations, we outlined our preference to participate in the public examination hearings as the Site has a draft allocation in the emerging Plan and a vested interest in the outcome of the EIP. As such, Savills and St Catherine's Hospice would like to maintain this request and reserve the right to comment on further iterations of the emerging Local Plan.

St Catherine's Hospice would like to thank CBC for the opportunity to comment on the Regulation 19 (Part 2) Local Plan Consultation and welcome the opportunity to work closely with the Council to realise the development of a positively prepared, justified and effective new Local Plan.

Yours sincerely



Jim Beavan MRTPI
Associate

Representations to the Crawley Borough Local Plan Review: Crawley 2035

Regulation 19 Consultation

St Catherine's Hospice, Malthouse Road, Crawley

Prepared for:

St Catherine's Hospice

Prepared by:

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1. Executive Summary

- 1.1. This representation is made to the Crawley Borough Council (CBC) Regulation 19 Consultation on the Emerging Local Plan. The consultation is open from 20 January 2020 until 02 March 2020.
- 1.2. This representation is submitted on behalf of St Catherine's Hospice and provides commentary on the key aspects of the consultation and evidence base as applicable to the land and buildings at St Catherine's Hospice, Malthouse Road ("the site"), which is being actively promoted to the Local Plan for residential development (Use Class C2 or C3).
- 1.3. The site currently comprises St Catherine's Hospice, a facility for palliative health care. St Catherine's services are to be provided in an alternative enhanced facility, roughly 2.5 miles from the existing site, in neighbouring Mid Sussex (planning permission for the new facility is granted under ref: DM/15/4711). The provisioning of these services has rendered the existing buildings at Malthouse Road unnecessary for St Catherine's Hospice and provides the opportunity for redevelopment on the site.
- 1.4. The emerging plan makes provision for the development of 5,355 net additional dwellings over the Plan Period 2020-2035; which is broken down into a stepped annual requirement of 500 dwelling per annum (dpa) between years 1-5; 450 dpa between years 6-10; and, 121 dpa between years 11-15. This is a significant reduction from the Government's Standardised Methodology, which sets the housing need of 752 dpa, c. 11,252 dwellings over the plan period.
- 1.5. Though it is widely accepted that the land constraints faced by CBC severely limits the capacity for housing growth in the Borough, the high levels of unmet need in Crawley merely attests to the need for the Council to ensure the delivery of all appropriate development sites in the Plan. To achieve this, CBC should provide sufficient flexibility within the Plan to facilitate development.
- 1.6. Strategic Policy H2 in the emerging Plan allocates Malthouse Road for development, recognising the multiple benefits of redevelopment at this site. Whilst welcomed, it is considered that the proposed restrictions for elderly care (residential Class C3 use for older people and/or residential rooms as Class C2) placed on the site are overtly prescriptive.
- 1.7. St. Catherine's is mindful that the trustees have an obligation under the Charities Commission to demonstrate best value within reasonable constraints. In planning terms, the site is ideal for housing of a broad range of types given its setting and proximity to good transport. We would not want to restrict usage at this stage, particularly when initial analysis shows that the site may only deliver marginal capacity to enable effective care home operation.
- 1.8. Whilst St Catherine's Hospice would prefer elderly accommodation on this site; additional flexibility should be provided to ensure that if there is demonstrated need, or a lack of demand in the market for elderly care in this location, the site can be redeveloped for unrestricted C3 use.



- 1.9. Within this representation comments are provided on CBC's Local Plan review where policies relate to the redevelopment of the Malthouse Road site. The conclusion is drawn that the allocation of the site at St Catherine's Hospice is supported, and should remain in the emerging Local Plan for development for residential Class C3 use for older people and/or residential rooms as Class C2, with flexibility to bring forward unrestricted residential dwellings (use class C3) if it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage.

2. Background to the Site

The Site

- 2.1. The 0.73 Ha site is situated on the southern side of Malthouse Road Crawley, which is a predominantly residential road, located approximately 0.7 miles south of Crawley town centre and railway station.
- 2.2. The site comprises four existing buildings, including the Main Hospice care building, the Turner Centre, the Awbrook building and the Mynthurst building. The Main Hospice is situated on the northern part of the site fronting onto Malthouse Road. The Turner Centre is located to the rear of the site and adjacent the southern boundary. The Awbrook building is located in the centre of the site, immediately east of the Main Hospice building. The Mynthurst building is located on the northern part of the site and fronts onto Malthouse Road (No. 128 Malthouse Road).
- 2.3. Vehicular and pedestrian access is provided via Malthouse Road, which abuts the northern boundary of the site.
- 2.4. Immediately south of the main hospice building is a larger building accommodating an extra care residential scheme. This is a reasonably large part 2, 3 and 4-storey building, known as Hogshell Gardens. To the west of the hospice building are No.s 60, 62 and 64 Brighton Road, these are 2-2.5 storeys in height.
- 2.5. The eastern boundary of the site (and No. 128) intersects Malthouse Road Conservation Area, with Goffs Park Road Area of Special Local Character located within 200m of the Hospice. Future development will be designed sympathetically to conserve and enhance the setting of the Conservation Area.
- 2.6. Malthouse Road predominantly comprises semi-detached, two storey, Edwardian houses which has largely influenced the character of the road. At present, the general scale, massing and design of St Catherine's Hospice does not respond well to the local vernacular.
- 2.7. There are a number of mature trees along the boundary of the site, these will to be assessed as part of an arboriculture survey to inform future development schemes. The neighbouring property, Hogshell Gardens on Brighton Road is known to have several trees protected by Tree Preservation Orders (TPO).
- 2.8. The site is in Flood Risk Zone 1, and therefore has the lowest chance of fluvial flooding, therefore flooding is not a constraint on the site.
- 2.9. A preliminary ecology survey has confirmed that the habitats on the site are "*predominately common and widespread throughout the local area.....Buildings, hardstanding, amenity grassland and introduced shrubs were dominant on site, which are of limited value.*"

- 2.10. Whilst there are some constraints on the site, these are not considered significant enough to negatively affect the opportunities for a comprehensive development to come forward. It is considered that there are numerous opportunities across the site, owing to the existing access points and close proximity to the train station and town centre.

The Proposals

- 2.11. As set out above, the aspiration for the site is to provide a comprehensive development, comprising either: a care facility of approximately 60-70 beds, for use as a residential care home or nursing home (use class C2); or, residential development of circa 60-70 dwellings (use class C3). The appended illustrative masterplans comprises 69 beds for the care home (Appendix 2.0) and 63 residential C3 units (Appendix 3.0), demonstrating the capacity of the site to accommodate higher density development than currently identified in Draft Policy H2.
- 2.12. Crawley is considerably constrained due to the limited land available in the Borough, as such, it is of paramount importance to maximise the development potential within, and close to, the Town Centre. The redevelopment of the site will increase the density of accommodation provided on the site, whilst enhancing the setting of the neighbouring Conservation Area.
- 2.13. As the development is still in its infancy, the illustrative masterplans are only a initial study on what can be achieved on the site. These demonstrate that redevelopment can increase the density of residential accommodation without prejudicing the urban grain.

Relocation of St Catherine's Hospice Facilities

- 2.14. St Catherine's Hospice is currently in the process of developing an enhanced care facility in Pease Pottage, two miles south of the Malthouse Road site. The relocation of St Catherine's Hospice will considerably improve the level of care offered at St Catherine's, providing a modernised and bespoke enhanced palliative care facility.
- 2.15. As the hospice will be relocated just outside of the Borough, the hospice will still provide services to Crawley residents and therefore the move will not affect the care provisions available in the area.

3. The Local Plan Review

- 3.1. These representations address the strategic policies set out in Section 2 (Sustainable Development); Section 4 (Character, Landscape and Development Form); Section 6 (Heritage); Section 12 (Housing Delivery); and, Section 17 (Sustainable Transport). Though some comments relate to the broader interpretation of policy, they are primarily focused on sections relevant to the site.
- 3.2. For clarity, representations were made to the Regulation 18 Consultation on the emerging Local Plan on behalf of St Catherine's Hospice earlier in the consultation process. This site has been allocated for development at draft Strategic Policy H2, and is referred to in the Strategic Housing Land Availability Assessment as St Catherine's Hospice, Malthouse Lane (ref: 83).
- 3.3. Draft Strategic Policy H2 allocates the site for *“residential Class C3 use for older people (60 dwellings) and/or residential rooms as Class C2 (Residential Home) use”*. Though welcomed, St Catherine's Hospice seeks to increase the quantum of development allocated on the site to c. 60-70 dwellings and additional flexibility in the policy to enable unrestricted C3 uses if a care provider is not forthcoming.
- 3.4. These representations considers the Plan against the tests of soundness, as set out in the National Planning Policy Framework (NPPF); highlighting elements of the Plan which would benefit from alterations to ensure that the Plan is found sound.
- 3.5. Paragraph 35 of the NPPF sets out the four tests to ensure the Plan is sound:
- a) **“Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 - b) **Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - c) **Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 - d) **Consistent with national policy** – *enabling the delivery of sustainable development in accordance with the policies in this Framework”*
- 3.6. Whilst the representation follows the section order set out in the Plan, we do not consider this to be the most logical approach to organise the policies. As such, it is suggested that the chapters on Economic Growth and Housing are presented earlier in the Plan as they help to set the context for new development, clearly outlining the opportunities and challenges facing the Borough.

Section 2: Sustainable Development

Strategic Policy SD1: Presumption in Favour of Sustainable Development

3.7. St Catherine's Hospice fully supports CBC's commitment to Sustainable Development and welcome the prospect of working positively with the Council to realise sustainable growth in the Borough.

3.8. However, paragraph 16 of the NPPF is pertinent, particularly where it states that:

"[Plans should] f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)"

3.9. Whilst we agree that the Council should set out their intentions to achieve Sustainable Development in the Borough, it is considered that this is explained sufficiently within the first two paragraphs of Strategic Policy SD1. At present, the extensive list of strategic objectives is superfluous and repetitive; by their nature of being strategic objectives, the importance of these policies is implied throughout the Plan.

3.10. To be found sound, it is suggested that the Council amends Strategic Policy SD1 to state that:

"[...Crawley and the wider Gatwick Diamond and West Sussex and Greater Brighton sub regions.]

Development will be supported where it accords with the policies and objective set out in this plan unless material considerations indicate otherwise."

Section 4: Character, Landscape and Development Form

Strategic Policy CL1: Neighbourhood Principle

3.11. St Catherine's supports the retention of the neighbourhood principle in Crawley. This spatial strategy is rooted in the origins of Crawley in the late 1940s and is one of the distinguishing characteristics of the Town.

3.12. Notably, Strategic Policy CL1 makes provision for mixed-use and high density development where it outlines that:

"Mixed use and higher density development may be compatible with the existing structure of the neighbourhood, particularly if it is situated in sustainable locations such as their neighbourhood centres."

3.13. Though supported in principle, we consider that CBC have missed an opportunity here to promote higher density development adjacent to key transport corridors in Crawley as well as neighbourhood centres.

- 3.14. Paragraph 123 of the NPPF emphasises the scope for higher density development to make efficient use of sites, particularly within Authorities where there is an existing or anticipated shortage of land for meeting housing needs.
- 3.15. To ensure that Strategic Policy CL1 is consistent with National Policy, and therefore found sound, it should be amended to promote higher density development by transport corridors.

Recommended Changes

“[particularly if it situated in sustainable locations, such as] neighbourhood centres or adjacent to transport corridors.”

Strategic Policy CL4: Effective Use of Land – Sustainability, Movement and Layout

- 3.16. St Catherine’s supports the Council’s promotion of sustainable modes of transport in Strategic Policy CL4, including the promotion of sustainable development with compact layout and scale.
- 3.17. However, it is considered that the 5-8 minute walking distance set out point 8 is too reductionist and does not reflect prevalent research in active transport or account for future trends in sustainable travel. Notably, in their report ‘Planning for Walking¹’, the Chartered Institution for Highways and Transportation (CHIT) identified that:
- “For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000). People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services.”*
- 3.18. St Catherine’s Hospice is located 800m from Crawley Train Station, a circa. 10 minute walk. In accordance with the report above, this is considered an appropriate distance to encourage residents to walk to the Station.
- 3.19. The draft Local Plan does not outline the Council’s rationale for incorporating a 5-8 minute walking distance cut off and it is unclear as to why CBC have quoted this in their policy. As such, St Catherine’s request that Strategic Policy CL4 is modified to reflect research on walking distances, providing flexibility to bring forward schemes that would otherwise be considered less sustainable.

Recommended Changes

“[Be planned and located adjacent to stations, stops or interchanges along existing segregated, high capacity, high frequent public transport corridors and their stops/interchanges. A contribution may be required to fund or part-fund the expansion of the same (see Policy ST1 and the Planning Obligations Annex); and]

Be designed and laid out so that it ensures that future habitants are within c. 10 minute walking distance of such rail stations or bus stops.”

¹ Planning for Walking, CHIT 2016, https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf

Strategic Policy CL5: Form of New Development: Layout, Scale and Appearance

3.20. St Catherine's supports the Council's proposals to introduce minimum density standards to targeted areas in Crawley.

3.21. The NPPF clearly supports the use of minimum densities at paragraph 123 where it outlines 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. In these circumstances:

a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;

b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range..."

3.22. St Catherine's Hospice is seeking to erect circa. 60-70 dwellings at a density of 96 dwelling per hectare (dph) at Malthouse Road, as demonstrated in the appended illustrative masterplan (Appendix 2.0 and 3.0). Notably draft Strategic Policy CL5 requires a minimum density of 45-70 dwellings per hectare for all major developments (under 80 units) within the Built-Up Area Boundary. The illustrative proposals therefore accord with this draft policy.

Section 6: Heritage

Strategic Policy HA2: Conservation Areas

3.23. In the Regulation 18 representations we highlighted the capacity for redevelopment to improve the setting of Conservation Areas. Whilst we welcome Policy HA2's recognition of opportunities to improve conservation areas by remediating ungainly buildings, it is considered that the Local Plan can develop this by specifying areas that will enhance the setting of these heritage asset.

3.24. Notably, Planning Practice Guidance (ref: 18a-003-20190723), states that:

".. Plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area."

- 3.25. Currently, the draft Local Plan allocates Land East of Balcombe Road, Poundhill and St Catherine's Hospice, Malthouse for development in Strategic Policy H2 (Key Housing Sites). However, neither Strategic Policy HA2 or Strategic Policy H2 highlight the potential for these developments to enhance the setting of the Conservation Areas.
- 3.26. Strategic Policy HA2 could be strengthened in accordance with paragraph 127 of the NPPF, specifically where it states that planning policies should facilitate development that is:
- “sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).”*
- 3.27. Significantly, paragraph B5 of the Sustainability Appraisal (SA) notes that “despite having grown considerably over a short period of time, Crawley’s neighbourhoods have retained distinctive characters.” Paragraph B6 also comments that “there are currently eleven conservation areas in the borough, defined as areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.”
- 3.28. The site analysis in the SA notes that the St Catherine’s Hospice site will have a significant positive impact on the Built Environment, stating that is “is previously developed and its reuse will address a vacant site, part of which lies within a Conservation Area so will need appropriate design.”
- 3.29. This implies that the Council acknowledges that there is potential for the redevelopment of St Catherine’s Hospice to enhance the setting of Malthouse Road Conservation Area, and also demonstrates that despite high levels of growth in the past, neighbourhoods in Crawley have retained their special characteristics. This sentiment should be drawn into Policy to highlight the positive impact new development and good design can have on Conservation Areas in Crawley.
- 3.30. As previously noted in paragraph 3.16 of this representation, the NPPF promotes the implementation of policy mechanisms to promote higher density development in constrained Authorities. CBC should reconsider the policy to outline support for sensitive and innovative redevelopments within, or adjacent to, Conservation Areas and explicitly encourage higher densities, good design and appropriate change across Crawley. This will provide more confidence to developers looking at these sites and will help to realise housing delivery whilst conserving heritage assets in the Borough.

Recommended Changes

[Conformity with the requirements of this Policy should be demonstrated as part of the Heritage Impact Assessment as part of the Heritage Impact Assessment]

The Council supports the redevelopment of suitable sites found within, or adjacent to, Conservation Areas where it can be demonstrated that the proposals will contribute to an improvement to the setting of the Conservation Area and promote well designed, innovative and higher density development in these sensitive locations.

Section 8: Infrastructure Provision

Strategic Policy IN1: Infrastructure Provision

- 3.31. Strategic Policy IN1 stipulates that existing services and facilities will be protected unless a replacement is provided or there is sufficient alternative provision available. Whilst we support this policy in principle, it is considered that the Council should recognise opportunities to replace lost infrastructure adjacent to the CBC's boundary.
- 3.32. As previously noted, St Catherine's Hospice is currently undergoing the process of relocating to an enhanced facility in Pease Pottage. Whilst this will relocate the services to the neighbouring District of Mid Sussex, the facility will be relocated within 2.5 miles of its present location, enabling the provision of improved palliative care services to Crawley residents. Therefore, there will be no net loss of care in this area.
- 3.33. As such, CBC should adopt a more flexible approach to the provision of infrastructure, recognising the unique land constraints within CBC. And the capacity for neighbouring areas to absorb some services, subsequently facilitating the redevelopment of key housing sites. Notably, within policy IN1, the Council make provision for new development to coordinate with the delivery of infrastructure on and off the site "including where infrastructure is located outside of Crawley but serves development within Crawley."
- 3.34. In accordance with this, the principle of provisioning services outside, but close to, Crawley should be expanded across the Policy.

Recommended Changes

"[Existing infrastructure services and facilities will be protected where they contribute to the neighbourhood or town overall, unless]

There is sufficient alternative provision of the same type in the area or an equivalent replacement or improvement is provided (including where this infrastructure is located outside of Crawley, but serves the town overall)."

Section 12: Housing Delivery

Strategic Policy H1: Housing Provision

- 3.35. St Catherine's Hospice recognise the significant land constraints facing Crawley and applaud the Council for increasing their housing supply since the Regulation 18 consultation and their positive approach to meeting housing need in the Borough.
- 3.36. However, whilst we support Strategic Policy H1, it is important to reflect on the context of housing need in the South-East. Notably, the significant levels of unmet need across the Gatwick Diamond and the Coastal West Sussex and Greater Brighton LEP. All authorities recognise the need for a sub-regional response to the challenges facing the South-East.

- 3.37. In light of this, the onus is on CBC to facilitate as much housing delivery as possible within the District boundary. As such, the implications of Strategic Policy H1 should be considered across the entirety of the Plan, mindful of the cumulative impacts of policy on the viability and deliverability of residential development in the Borough.

Strategic Policy H2: Key Housing Sites

- 3.38. St Catherine's supports the allocation of their Malthouse Road site in Strategic Policy H2. However, the allocation for "*residential Class C3 use for older people (60 dwellings) and/or residential rooms as Class C2 (Residential Home) use*" is too restrictive and may delay delivery on the site. Whilst it is St Catherine's preference to accommodate elderly accommodation, additional flexibility is sought within the policy to enable unrestricted C3 development at the site if a care provider is not forthcoming. This amendment to the policy would ensure the policy is effective and able to adapt where justified at the application stage via evidence of marketing or demonstrated need for general housing needs.
- 3.39. The suitability of the Site is recognised in the SA (Appendix 5.0), which highlights the Significant Positive Impacts/Positive Impacts development would have on the site. Significantly, the site has been acknowledged as having a significant positive impact for SA Objectives 1, 2 and 3; including positive impacts for SA objectives 5, 6, 7 and 8. These positive outcomes will not change if the site is developed for traditional housing over elderly housing, therefore, the redevelopment will still result in positive impacts to the immediate and wider environs.
- 3.40. Additionally, the SHLAA (appendix 4.0) assesses the site (ref: 83) as being suitable, available and achievable. This demonstrates that the site is both "suitable and developable for housing, subject to reprovision of the hospice facility and development of an appropriate scheme."
- 3.41. In accordance with the SHLAA assessment, Policy H2 should recognise the reprovision of St Catherine's Hospice to Pease Pottage, circa. 2.5 miles from Malthouse Road. As such, there will be no net loss of infrastructure to the residents of Crawley.
- 3.42. St. Catherine's is mindful that the trustees have an obligation under the Charities Commission to demonstrate best value within reasonable constraints. In planning terms the site is ideal for housing of a broad range of types, given its setting and proximity to good transport. We would not want to restrict usage at this stage, particularly when initial analysis shows that the site may only deliver marginal capacity to enable effective care home operation.
- 3.43. Whilst St Catherine's have been gifted the land at Pease Pottage, St Catherine's still requires an adequate land receipt to contribute to building the new facility. Creating flexibility in the policy will attract the most market interest and ensure the earliest possible delivery of the site.
- 3.44. In light of this, we request that Strategic Policy H2 is reworded to allow higher densities at this location and ensure that if there is a lack of developer interest or demand in the market, the site can be redeveloped for unrestricted C3 use.

- 3.45. As part of this, the expectations for Building Regulations Part M, Category 3 should be omitted if the site is not developed for elderly housing. This will recognise the opportunities available at the site, demonstrating the Council's commitment to facilitating housing delivery in Crawley.
- 3.46. In addition, it is important that the largest allocations identified in Policy H2 include an allowance for C2/C3 older person accommodation. This will enable a balanced mix of supply and is required in the context of making the best use of land in response to CBC's acknowledged unmet needs.

Recommended Changes

"[St Catherine's Hospice (developable) as residential Class C3 use for older people (60 - 70 dwellings) and/or residential rooms as Class C2 (Residential Home) use.

Development on these sites should specifically meet the needs of older people, either as a care facility in the form of Extra-Care or Residential Care or to provide general housing designed to meet particular needs of older people including being wheelchair adapted dwellings meeting Building Regulations Part M, Category 3 accessibility standards] unless it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage."

Strategic Policy H4: Future Housing Mix

- 3.47. Strategic Policy H4 sets out the required housing mix for development sites in Crawley. Whilst the policy acknowledges the need for the types of housing to reflect the size and characteristics of the site and viability of the scheme; it then goes on to stipulate that new developments are required to provide a housing mix test in accordance with the recommendations cited at paragraph 13.14.
- 3.48. To ensure that future developments in Crawley can respond to local needs and the market, Policy H4 should be made more flexible to increase the efficiency of sustainable sites and ensure the deliverability and viability of these new dwellings.
- 3.49. Notably, the new policy wording of the emerging Plan goes significantly beyond that used in Policy H3: Future Housing Mix in the adopted Plan (set out below). As such, it is considered that the previous policy wording should be retained in the emerging Plan, making reference to recent evidence.
- 3.50. It is therefore suggested the more prescriptive text is removed and the emerging Plan retains the previous policy wording.

Recommended Changes

"[All housing development should provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand. The appropriate mix of house types and sizes for each site will depend upon the size and characteristics of the site and the viability of the scheme. However, consideration should be given to the evidence established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley.

Affordable Housing

In delivering the affordable housing element of residential schemes, in line with Policy H5, the need for one, two and three bedroom affordable dwellings in Crawley, as identified in the council's Strategic Housing Market Assessment and its updates, should be addressed in meeting the housing needs of those considered to be in greatest need.]”

Section 17: Sustainable Transport

Strategic Policy ST2: Car and Cycle Parking Standards

- 3.51. St Catherine's support the changes to Strategic Policy ST2.
- 3.52. The introduction of Parking Behaviour Zones and corresponding parking standards is considered justified as it localises the parking policies, reflecting the circumstances of each individual neighbourhood. This is compliant with paragraph 105 of the NPPF and encourages the use of public and active transport in sustainable locations.

4. Conclusions

- 4.1. This representation is made to the Crawley Borough Council (CBC) Regulation 19 Consultation on the Emerging Local Plan. The consultation is open from 20 January 2020 until 02 March 2020.
- 4.2. The representation is submitted on behalf of St Catherine's Hospice and provides commentary on key aspects of the Emerging Plan as applicable to site at St Catherine's Hospice, Malthouse Road, which is being promoted to the CBC Local Plan Review for residential development.
- 4.3. The relocation of St Catherine's Hospice to enhanced facilities in Pease Pottage provides the opportunity to provide modern, attractive and sensitively designed new dwellings on the Malthouse Road site. The redevelopment of the site demonstrates the capacity for medium sites to enhance the surrounding area whilst contributing to housing delivery in the District.
- 4.4. Strategic Policy H2 in the emerging Plan allocates the St Catherine's Hospice for development, recognising the multiple benefits of redevelopment at this site. Whilst St Catherine's preference is for elderly care accommodation, it is considered that this proposed policy is overtly prescriptive and may delay the redevelopment of the site.
- 4.5. It is requested that the Strategic Policy H2 is amended to provide additional flexibility to ensure that if there is a lack of developer interest and/or market demand, the site can be redeveloped for unrestricted C3 use.
- 4.6. Though it is widely accepted that the land constraints faced by CBC severely limits the capacity for housing growth in the Borough, the high levels of unmet need in Crawley merely attests to the need for the Council to ensure the delivery of all appropriate development sites in the Plan. To achieve an effective Plan, CBC should provide sufficient flexibility within the Plan to facilitate development and ensure density is maximised.
- 4.7. The requested amendments to Policy H2 will also help St Catherine's to achieve adequate land receipts to help contribute to the building of the new facility at Pease Pottage by attracting the most market interest in the land. This will also ensure St Catherine's are able to demonstrated best value, required by the Charities Act, and ensure the earliest possible delivery of the site.
- 4.8. As demonstrated by the illustrative masterplans, the Malthouse Road site is able to accommodate 60-70 dwellings and it is requested the housing number in draft Strategic Policy H2 is amended for St Catherine's accordingly.
- 4.9. Within this representation comments are provided on CBC's Local Plan review. The conclusion is drawn that the allocation of the site at St Catherine's Hospice is supported, and should remain in the emerging Local Plan for development for residential Class C3 use for older people and/or residential rooms as Class C2, with flexibility to bring forward unrestricted residential dwellings (use class C3) if it can be demonstrated that there is a lack of developer interest via a marketing period of 3 months or demonstrably evidence of need for unrestricted C3 use at the planning application stage.



- 4.10. These representations are underlined by the promotion of the site for residential development. As such, Savills and St Catherine's Hospice reserve the right to comment on the emerging Local Plan.

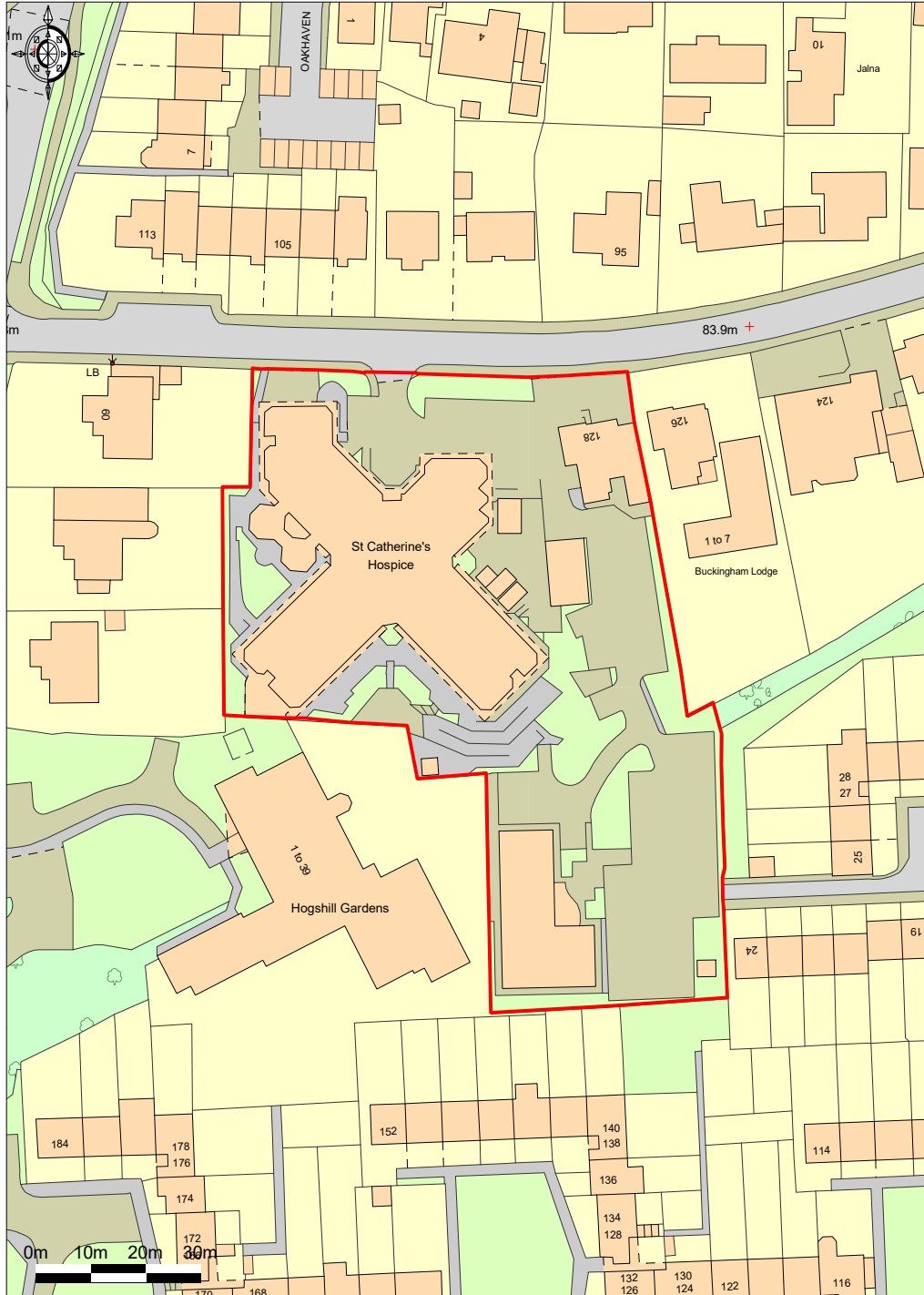


Appendices



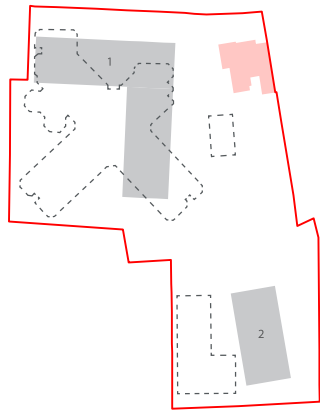
Appendix 1.0 Site Plan

St Catherine's Hospice, Malthouse Road, Crawley





Appendix 2.0 Illustrative Care Home (Use Class C2) Masterplan



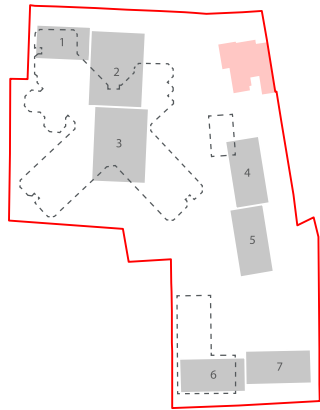
- Site boundary
 - Proposed buildings 1-2
 - Retained no. 128 Malthouse Road
 - Demolished structures
 - Existing trees
 - Proposed trees
 - Trees to be removed
- 2 storey structures: Building 2
2.5 storey structures: Buildings 1



Illustrative roofplan 1.500



Appendix 3.0 Illustrative Residential (use Class C3) Masterplan



- Site boundary
 - Proposed buildings 1-7
 - Retained no. 128 Malthouse Road
 - Demolished structures
 - Existing trees
 - Proposed trees
 - Trees to be removed
- 2 storey structures: Buildings 1, 6, 7
 2.5 storey structures: Buildings 2, 3, 4, 5

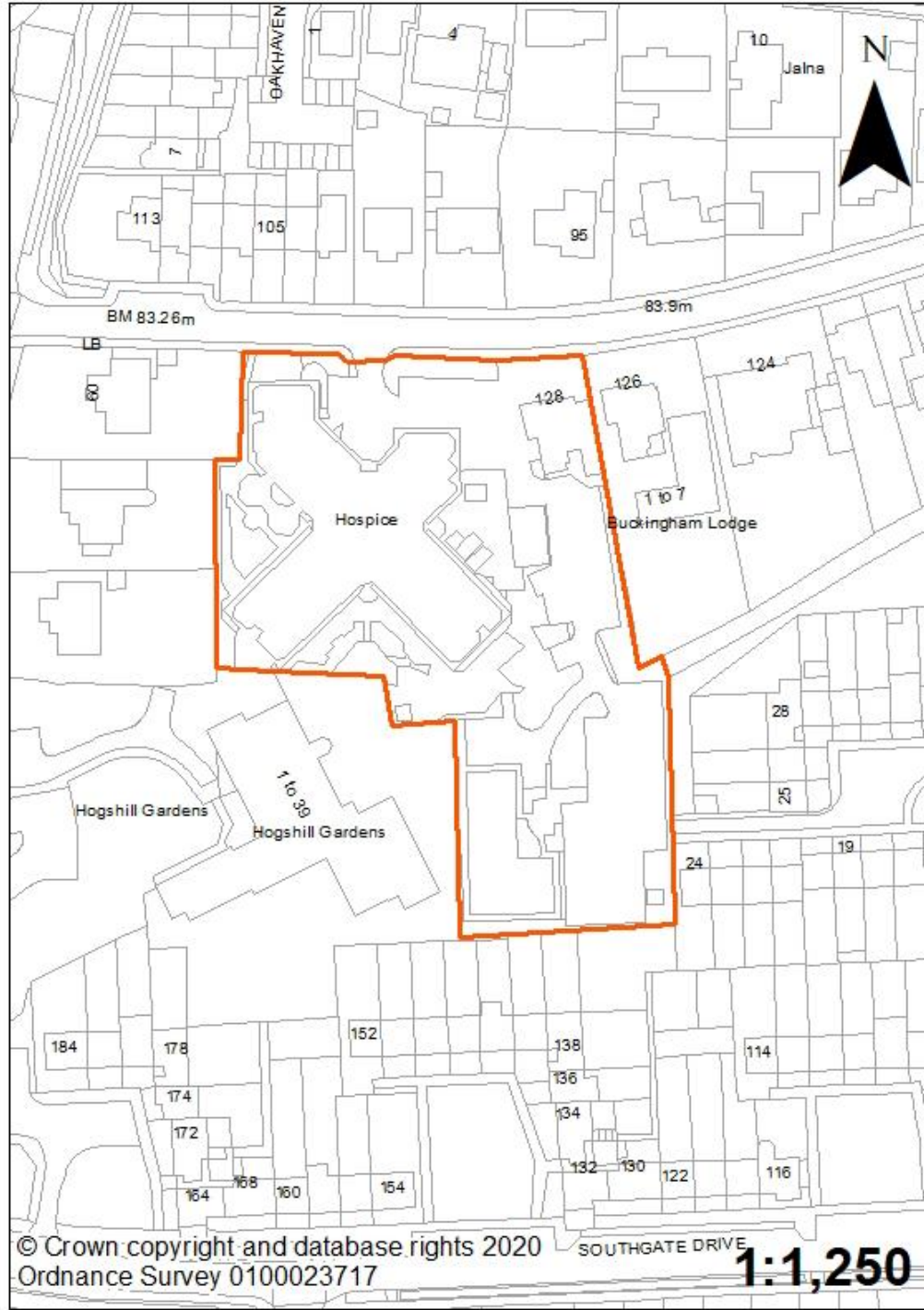


Illustrative roofplan 1.500

Appendix 4.0 SHLAA Excerpt

Site Reference	83	Neighbourhood	Southgate													
Site Name / Address	St Catherine's Hospice, Malthouse Road															
Existing Land Use (s)	Hospice providing palliative care.															
PA. Number	-	Gross Dwellings	60													
Lapse Date	-	Demolitions	0													
PDL / Greenfield	PDL	Net Dwellings	60													
Site Area (Gross hectares)	0.73	Current Density	-													
Site Suitability	Yes – Subject to reprovision of hospice facilities elsewhere within the wider area. The site is located in a residential area in reasonable proximity to the town centre, and would in principle be suitable for residential development. The site is allocated in the submission draft 2020 Local Plan as 'housing for older people', either in the form of dwellinghouses (C3) or a residential home (C2 use).															
Site Availability	Yes – St Catherine's Hospice is due to relocate to new premises in Pease Pottage by 2022. The site is partly owned by Crawley Borough Council, which is supportive of redevelopment.															
Site Achievability	Yes – The site is considered to be viable for the purposes of residential and development is considered achievable in the first five years of the 2020 Local Plan. Design will have to be carefully considered and respond appropriately to the character of the surroundings, including Malthouse Road Conservation Area, which overlaps with the site.															
Action Required / Constraints	Further collaboration between the council and St Catherine's Hospice to agree a general approach and develop an appropriate scheme.															
Phasing for development																
19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36
						60										
Summary	This site is considered both suitable and developable for housing, subject to reprovision of the hospice facility and development of an appropriate scheme.															

St Catherine's Hospice, Malthouse Road Southgate, Crawley



Appendix 5.0 Sustainability Appraisal Excerpt

Assessment of Key Housing for Older People Sites (Policy H2)

Site Name: St. Catherine's Hospice, Southgate

Site Potential Allocation: Housing for Older People

Site Description: the site is located within an established residential area, close to the town centre. The site currently includes an existing Hospice which is to be relocated to a new site at Pease Pottage.

Impacts of the Development	
SA Objective	Commentary and/or Impact
1. Minimise Climate Change & Local Pollution	Close to town centre: sustainable location within the urban area. Brownfield site. Sustainable design and construction will apply to new build. There are no known issues with land contamination or noise, air or water pollution. Significant Positive Impact (++)
2. Adapt to Climate Change	The site is not within an area of identified flood risk. It is currently a brownfield site and would form the reuse of land. Sustainable design and construction and water management measures could improve the drainage and run-off associated with this site. Significant Positive Impact (++)
3. Protect and/or Enhance the Built Environment	The site is located within the built up area. The site is previously developed and its reuse will address a vacant site, part of which lies within a Conservation Area so will need appropriate design. Significant Positive Impact (++)
4. Decent/ Affordable Homes	Could offer a proportion of new homes. Increasing the capacity of the town to meet very specific needs for older people emerging from the population either as a care home or as housing designed to adapt to the needs of older people to allow for them to retain independence for longer. Include 40% affordable housing and/or affordable care. Significant Positive Impact (++)
5. Maintain/ Support Employment	The provision of new housing is closely linked to supporting economic growth. Positive Impact (+)
6. Conserve/ Enhance Biodiversity and Landscape	Biodiversity enhancements should be designed into any scheme. Positive Impact (+)
7. Promote Sustainable Journeys	The site is located within the urban area, and close to the town centre. Positive Impact (+)
8. Provide Sufficient Infrastructure	The site is located adjacent to the existing residential area which are served by existing infrastructure services. Positive Impact (+)
9. Promote Sustainable Communities and Encourage Active Lifestyles	Specific development of the site to meet the needs of Crawley's older people addresses existing shortfalls in this type of provision. The site is located within the urban area, close to the town centre. By providing specialised housing provision for older people it will be for the residents to be active and independent in later life. Significantly Positive Impact (++)
Conclusions	The site is located within the built up area, close to amenities within the town centre and neighbourhood health care services. It is a secluded site and offers advantages for its development either as a residential/care home or for the general housing needs of older people.