

Local Plan Representation

FPLP525327890

PART A Personal details

Title	Ms.
First name	C
Last name	Searle
Organisation	Homes England
Is the address	Outside Crawley, or not found
Flat name or number	Ground Floor
House name or number	Bridge House
Street	1 Walnut Tree Close
Town	Guildford
Postcode	GU1 4LZ
Email	caroline.searle@homesengland.gov.uk
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Mobile number	07929822875
Has a planning agent been appointed?	No

PART B Your representation

Which document would you like to make a representation on?	Crawley submission Local Plan
Which part of the Local Plan does this representation relate to?	Policy
Please give details.	Policy H2: Key Housing Sites
Legally compliant?	Yes
Sound?	No
Compliant with the duty to co-operate?	Yes

Please give details explaining your response.

Land East of Tinsley Lane is an allocated site in the existing Crawley Local Plan, under Policy H2: Key Housing Sites. The policy currently requires the following: Tinsley Lane, Three Bridges (deliverable) 120 dwellings, mixed use recreation/residential. Development of this site must include: i. the replacement of Oakwood Football Club; ii. senior football pitch and facilities; iii. a junior 3G football pitch; iv. community use arrangements for the sports pitch facilities; v. enhancement and management for public access of Summersvere Woods; vi. on-site publicly accessible play space and amenity greenspace; vii. consideration should be given to the provision of allotments. Development must also be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site. Full details of the requirements relating to this site will be set out in a Tinsley Lane Development Brief. The proposed Plan retains Tinsley Lane as a site allocation which Homes England supports. The policy requirements remain but with the removal of "consideration of" in reference to allotments, strengthening the requirement. Homes England requests reference to allotments is removed, or the policy reverts back to "consideration should be given to the provision of allotments." Reasons for this request relate to both delivery and viability concerns as set out below. Delivery An outline planning application was submitted in 2021 (reference: CR/2021/0355/OUT). The application was due to go to Committee and the Officers Report had been prepared with a recommendation for approval when Natural England paused the determination of all applications in the Borough until a strategic water neutrality solution was put forward. The applicant is in the process of undertaking the necessary calculations and analysis to prepare a Water Neutrality Statement which will enable the application to go to Committee this Autumn. The planning statement for the 2021 application explained that allotment space had been considered but was not deemed feasible due to the following reasons: - the scale of the open space, the woodland and sports facilities being proposed at this site - a unique design approach which provides a continuous housing "edge" which shields

new and existing residents from noise from the Goods Yard/ Manor Royal. - requirement for SuDS attenuation areas due to poor drainage. - a 15m woodland buffer from the Ancient Woodland. - recent addition of TPO notifications for a large number of trees and hedgerows - policy requiring delivery of 1 tree per home - setback from the Crawley Avenue Air Quality Management Area The illustrative masterplan for the OPA instead includes more than double the quantum of open space provision as set out in the total open space requirements; including provision of play space, amenity green space, a woodland buffer area and structural landscaping along with the SuDs Zones. In addition a Senior artificial pitch is proposed whereas the policy requires only a junior artificial pitch enhancing the usage of the sports provision. Moreover, a demand for allotments has not been identified during the pre-application consultation. Viability The allocation for Land East of Tinsley Lane requires the provision of significant infrastructure for a relatively small scheme of 120 units including: - 40% affordable housing - wider S106 contributions and CIL - provision of a new and significantly improved football club and associated pitches with a community use agreement. - new amenity and play space - opening up of the woodland for community access - improvements to Birch Lea - water neutrality solution and financial contribution as per Policy SDC4 The proposed plan also introduces a number of additional requirements which the development will be required to comply with if adopted in its current form. This includes requirements such as enhanced sustainability and energy requirements; increased requirements for accessible and adaptable dwellings along with self and custom build homes. Viability will be compromised with the addition of allotments. As an Agency we are reluctant to "water down" other contributions such as affordable housing. Conclusion The 2021 submitted application is therefore currently compliant with the adopted local plan and Development Brief in regard to allotment requirements but would become discordant with the proposed amendment which removes the allowance for "consideration" to be given to the allotments rather than a strict requirement. It is clear from the information submitted for the site to date that the allotment provision has not been possible and therefore this amendment would jeopardise the delivery of the scheme. The allocation policy in its current adopted form along with both the existing and emerging wider policies require significant community infrastructure to be provided on site. The addition of allotments will impact on the deliverability and viability of the scheme. It is therefore requested that the reference to allotments should be removed in its entirety or retained as per the existing wording.

Please set out what modification(s) you consider necessary to resolve the issues you have identified above.

Modification requested to Policy H2: Key Housing Site (Tinsley Lane vii): Homes England requests reference to allotments is removed, or the policy reverts back to "consideration should be given to the provision of allotments."

If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings?

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

Form submitted by:

Ms. C Searle on 20/06/2023



Tinsley Lane

Local Plan Representation

Tinsley Lane, Three Bridges (deliverable) 120 dwellings, mixed use recreation/residential. Development of this site must include:

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

Development must also be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site.

Full details of the requirements relating to this site will be set out in a Tinsley Lane Development Brief.

The proposed Plan retains Tinsley Lane as a site allocation which Homes England supports. The policy requirements remain but with the removal of 'consideration of' in reference to allotments, strengthening the requirement. Homes England requests reference to allotments is removed, or the policy reverts back to '*consideration should be given to the provision of allotments.*'

Reasons for this request relate to both delivery and viability concerns as set out below.

Delivery

An outline planning application was submitted in 2021 (reference: CR/2021/0355/OUT). The application was due to go to Committee and the Officers Report had been prepared with a recommendation for approval when Natural England paused the determination of all applications in the Borough until a strategic water neutrality solution was put forward. The applicant is in the process of undertaking the necessary calculations and analysis to prepare a Water Neutrality Statement which will enable the application to go to Committee this Autumn.

The planning statement for the 2021 application explained that allotment space had been considered but was not deemed feasible due to the following reasons:

- the scale of the open space, the woodland and sports facilities being proposed at this site
- a unique design approach which provides a continuous housing 'edge' which shields new and existing residents from noise from the Goods Yard/ Manor Royal.
- requirement for SuDS attenuation areas due to poor drainage.
- a 15m woodland buffer from the Ancient Woodland.





- recent addition of TPO notifications for a large number of trees and hedgerows
- policy requiring delivery of 1 tree per home
- setback from the Crawley Avenue Air Quality Management Area

The illustrative masterplan for the OPA instead includes more than double the quantum of open space provision as set out in the total open space requirements; including provision of play space, amenity green space, a woodland buffer area and structural landscaping along with the SuDs Zones. In addition, a Senior artificial pitch is proposed whereas the policy requires only a junior artificial pitch enhancing the usage of the sports provision. Moreover, a demand for allotments has not been identified during the pre-application consultation.

Viability

The allocation for Land East of Tinsley Lane requires the provision of significant infrastructure for a relatively small scheme of 120 units including:

- 40% affordable housing
- wider S106 contributions and CIL
- provision of a new and significantly improved football club and associated pitches with a community use agreement.
- new amenity and play space
- opening up of the woodland for community access
- improvements to Birch Lea
- water neutrality solution and financial contribution as per Policy SDC4

The proposed plan also introduces a number of additional requirements which the development will be required to comply with if adopted in its current form. This includes requirements such as enhanced sustainability and energy requirements; increased requirements for accessible and adaptable dwellings along with self and custom build homes.

Viability will be compromised with the addition of allotments. As an Agency we are reluctant to 'water down' other contributions such as affordable housing.

Conclusion

The 2021 submitted application is therefore currently compliant with the adopted local plan and Development Brief in regard to allotment requirements but would become discordant with the proposed amendment which removes the allowance for 'consideration' to be given to the allotments rather than a strict requirement. It is clear from the information submitted for the site to date that the allotment provision has not been possible and therefore this amendment would jeopardise the delivery of the scheme.

The allocation policy in its current adopted form along with both the existing and emerging wider policies require significant community infrastructure to be provided on site. The addition of allotments will impact on the deliverability and viability of the scheme. It is therefore requested that the reference to allotments should be removed in its entirety or retained as per the existing wording.

