

Local Plan Representation

FPLP524041157

PART A Personal details

Title	[REDACTED]
First name	[REDACTED]
Last name	[REDACTED]
Is the address	[REDACTED]
Enter postcode or street name to lookup	[REDACTED]
Address	[REDACTED]
House name or number	[REDACTED]
Street	[REDACTED]
Neighbourhood	[REDACTED]
Town	[REDACTED]
County	[REDACTED]
Postcode	[REDACTED]
Email	[REDACTED]
Confirm email	[REDACTED]
Mobile number	[REDACTED]
Has a planning agent been appointed?	No

PART B Your representation

Which document would you like to make a representation on?	Crawley submissions on Local Plan
Which part of the Local Plan does this representation relate to?	Other
Please give details.	Proposed Development of the Land East of Tinsley Lane
Legally compliant?	No
Sound?	No
Compliant with the duty to cooperate?	Yes
Please give details explaining your response.	Please see attached document
Please set out what modification(s) you consider necessary to resolve the issues you have identified above.	Remove the Proposed Development to the East of Tinsley Lane as it is not a viable option and does not comply with Council and Government Guidelines. Retain the existing Sports Facilities and allow Oakwood Football Club to continue to develop the diversity of sports provision in the area for youth and women's football development.
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
Do you wish to upload any supporting documentation or files?	Planning Objectives June 2023.pdf
Form submitted by:	[REDACTED] on 14/06/2023

Comments and Objection to Crawley Submission Draft Local Plan Specifically Application CR/2021/0355/OUT Land East of Tinsley Lane

1.0 Summary of Objections

My comments and objections refer to both the overall plan and specifically to the proposed development near Tinsley Lane where the initial proposal was rejected by all 10 Councillors and the revised proposal currently on hold due to the water issues.

In summary my comments and objections fall into the following categories and are supported by evidence as you work through this document:

1. **Birch Lea is still not suitable as the access point for the same reasons as the previous rejected plan.**
2. **The Plan and specifically the proposed development at Tinsley Lane contravenes your own planning guidelines and Government advice. Lack of adherence to Council Policy and wider Government advice.**
3. **Resident Quality of Life and Disturbance, including unacceptable harm to the residential amenity.**
4. **Highway and pedestrian safety, particularly for the disabled.**
5. **The housing density has not changed significantly as per the previous proposal.**
6. **Less than 150 dwellings not being Economically viable as previously stated by the Planning Officer.**
7. **Overlooking/loss of privacy, Noise and Disturbance**
8. **Adequacy of parking/loading/turning.**
9. **Significant increase in Traffic generation and Vehicle movements**

10. **No pressing need to develop the site with other larger developments in the pipeline.**
11. **Impact on wildlife and habitat in particular bats, deer, foxes, birds, rabbits, trees and wild meadows etc.**
12. **Significant impact on residents of Birch Lea whose life choices have been to locate to a quiet cul de sac with no passing traffic, if approved this development would create a completely unacceptable increase in the level of traffic, associated noise and reduction in air quality. The narrow pavements will increase the risk to pedestrians and reduce their levels of safety.**
13. **Air quality is declining in the AQMA, proposed homes fall within this area.**
14. **Reduction of Sports facilities in Crawley**
15. **Water Neutrality is a very serious issue and will result in water shortages for all residents unless managed effectively**

I suggest the proposal contravenes your own planning guidelines and Government advice in numerous areas and therefore the Planning Application should be rejected

In the revised proposal I'm not able to see what significant improvements have been made that would address the issues raised by the Councillors and enable them to change their mind and accept this plan in relation to the access through Birch Lea and housing density. If anything, the revised proposal has made the Birch Lea access point even less desirable on safety grounds.

2.0 Overall Applications Adherence to Government and Council Guidance and Standards

2.1 Building for Healthy Life - Homes England

Create places that are well integrated into the site and their wider natural and built surroundings. Avoid creating isolated and disconnected places that are not easy places to move through and around.

What Red Looks Like

Single or limited points of access for pedestrians and cyclists. Yes 1 access point Birch Lea

Extensive use of private drives. Yes multiple drives along the access road Birch Lea Failing to respond to existing (or anticipate future) pedestrian and cycle desire lines. Failed, Enclosed Development on all sides

No opportunities to connect or extend streets and paths if required by later development. None, Enclosed Development on all sides

Retaining existing hedgerows between the back gardens of individual homes.

Illustrative Plan Removes hedgerows

Ransom strips

What Green Looks Like

Filtered permeability. A useful technique that designs out 'rat running' and creates a pleasant low traffic environment around people's homes whilst still allowing pedestrian and cycle movement. Tinsley lane is already a 'Rat Run' during the evening rush hour.

Connecting existing and new habitats; safeguarding existing or creating new movement corridors for nature. No, a wild meadow will be destroyed alongside bordering woodland

Where retained, keeping hedgerows within the public realm, safeguarding their future retention and management. Please ensure future plans uphold this requirement, the illustrative plan does not

Streets and routes that can be extended in the future. No, enclosed development The whole site is isolated and disconnected.

Short trips of up to three miles can be easily made on foot or bicycle if the right infrastructure is in place, helping to improve public health and air quality whilst also reducing local congestion and carbon emissions.

What Red Looks Like

Travel Packs that fail to influence people's travel choices. Yes people will still need to use cars

White line or undivided shared pavement/cycle ways. No, cycleways all shared with motor vehicles

Pedestrians and cyclists losing priority at side junctions. Yes

Streets principally designed around waste collection vehicles. Yes, adjustments in the plan have been made for waste collection vehicles

What Green Looks Like

Design out school runs dependent on cars No, nearest schools will require runs dependant on cars

Share street space fairly between pedestrians, cyclists and motor vehicles. No motor vehicles take priority in this plan. Removal of footpath to accommodate motor vehicles in Birch Lea as evidence, with a minimum road width of 5.5m.

Cycle friendly streets (see Local Transport Note 1/12) with pedestrian and cycle priority (and protection) with across junctions and side streets No, as above.

Streets are different to roads. Streets are places where the need to accommodate the movement of motor vehicles is balanced alongside the need for people to move along and cross streets with ease. Activity in the street is an essential part of a successful public realm.

What 'red' looks like

Roads for cars. Birch Lea being redesigned to accommodate an increase in cars

Failure to adhere to the user hierarchy set out in Manual for Streets. Yes Failed

Distributor roads with limited frontage access, served by private drives. Yes, Birch Lea

Speed control measures that rely on significant shifts in street alignment that contribute towards wasting land whilst also creating disorientating places. Yes, Birch Lea Realignment

Whats needed

Avoid streets that are just designed as routes for motor vehicles to pass through and for cars to park within. Birch Lea redesigned for increased vehicle usage and the removal of a footpath in the latest plan to accommodate vehicles.

- Provide conditions for cycling appropriate to the speed and volume of motor traffic. No provision for safe cycling has been made.

• **Inclusive design:** think about how people with visual, mobility or other limitations will be able to use the street confidently and safely **See section on Footpath and pedestrian Safety**

Creative surface water management such as rills, brooks and ponds enrich the public realm and help improve a sense of wellbeing and offer an interaction with nature. As the richest habitat for a range of flora and fauna, they are also a key play in achieving the net gain in biodiversity sought by the 2020 Environment Bill.

The loss of a wild meadow and approximately 300 trees to accommodate this development does not support the 2020 Environment Bill

What Green Looks Like

Biodiversity net gain. No, Biodiversity net loss

Plans that identify the character of new spaces, such as 'parks', 'woodland', 'allotments', 'wildflower meadows' rather than 'P.O.S.' Loss of a wild meadow, see photos later in this document

Allow people to connect with water. No, access to Gatwick stream via a footbridge to Grattons Park was rejected

Create a habitat network providing residents with opportunities to interact with nature on a day to day basis. Wildlife does not flourish within disconnected back gardens, artificial lawns and tightly mown grass. Wildlife will not flourish when replacing a wild meadow with artificial football pitches

Provide natural surveillance opportunities. A connected and accessible network of public open spaces with paths and other routes into and through. Species rich grasslands. Rich grassland is being replaced by artificial football pitches

Well considered management arrangements whether public or privately managed.

Current evidence of the management of grass verges around the area indicate that this is not well considered or managed . See photos of Birch Lea grass verge.



What Red Looks Like

Small pieces of land (typically grassed over) that offer little or no public, private or biodiversity value that over time become neglected and forgotten. Yes according to the illustrative Plan

Buildings that turn away from open spaces. Poor quality finishing, detailing and maintenance. Yes, Apartments on the Plan

Garden cities, towns and suburbs used hedges to define public and private spaces, helping to create characterful and biodiverse places. The space between the back of the pavement and the face of buildings has a significant impact on the quality of a place. Clear demarcations between public and private spaces can encourage people to personalise the front of their homes whilst also offering opportunities to integrate level changes, utility boxes and waste storage.

Boundary treatments that add ecological value and/or reinforce distinctive local characteristics. No, removal of trees and hedgerows

Well integrated waste storage and utility boxes. No, not for the houses

If relying on rear garden storage solutions for terraces and townhouses, provide direct access to these from the street. Not according to the illustrative Plan

Ground floor apartments with their own front doors and semi-private amenity spaces help to enliven the street whilst also reducing the amount of people using communal areas. Not for the apartments

Consider providing terraces or balconies to above ground floor apartments – these can also help to enliven the street, increase natural surveillance and provide

residents with access to the open air. No not in the design

What Red Looks Like

Waste storage solutions for terraced homes that rely on residents storing bins and crates in rear garden spaces and instead often sees bins and crates placed next to front doors. Yes based on the illustrative Plan

2.2 Manual for the Streets - Ministry of Transport 2007

The extracts below make it clear that cycling and walking should be a key consideration in any planning application and this should meet the standards set by the Ministry of Transport. Utilisation of vehicles should be minimised.

Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS134 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents.

Distances and Times on foot from Birch Lea, one-way:

**Three bridges primary school 1.9km mins,
Forge Wood Primary School 2.7km 33 mins,
Gatwick school 1.1, 14 mins,
Hazelwick 1.0 km 12 mins,
Tesco 1.2 km 15 mins.
Wickes DIY 2.1 km 26 mins
Screwfix 1.5km 18 mins
Tool Station 900m 10mins
Aldi, Marks and Spencer, Tesco Express, County Oak 2.4 km 29 mins**

All outside the recommended 800m 10 minute walk threshold laid down, encouraging the use of Cars.

It is recommended that the design of a scheme should follow the user hierarchy shown in Table 3.2. Table 3.2: User hierarchy Consider first Pedestrians Cyclists Public transport users Specialist service vehicles (e.g. emergency services, waste, etc.)

This is not the case in the revised proposal, see the section covering Footpath and Pedestrian safety.

“2.7 Disability discrimination

2.7.1 Highway and planning authorities must comply with the Disability Equality Duty under the Disability Discrimination Act 2005.¹⁶ This means that in their decisions and actions, authorities are required to have due regard to the six principles of:

- promote equality of opportunity between disabled persons and other persons;
- eliminate discrimination that is unlawful under the 2005 Act;
- **eliminate harassment of disabled persons that is related to their disabilities;**

- promote positive attitudes towards disabled persons;
- encourage participation by disabled persons in public life; and
- take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons.

2.7.2 Those who fail to observe these requirements will be at the risk of a claim. Not only is there an expectation of positive action, but the duty is retrospective and local authorities will be expected to take reasonable action to rectify occurrences of non-compliance in existing areas.

2.7.3 The Disability Rights Commission (DRC) have published a Statutory Code of Practice on the Disability Equality Duty and they have also published specific guidance for those dealing with planning, buildings and the street environment.

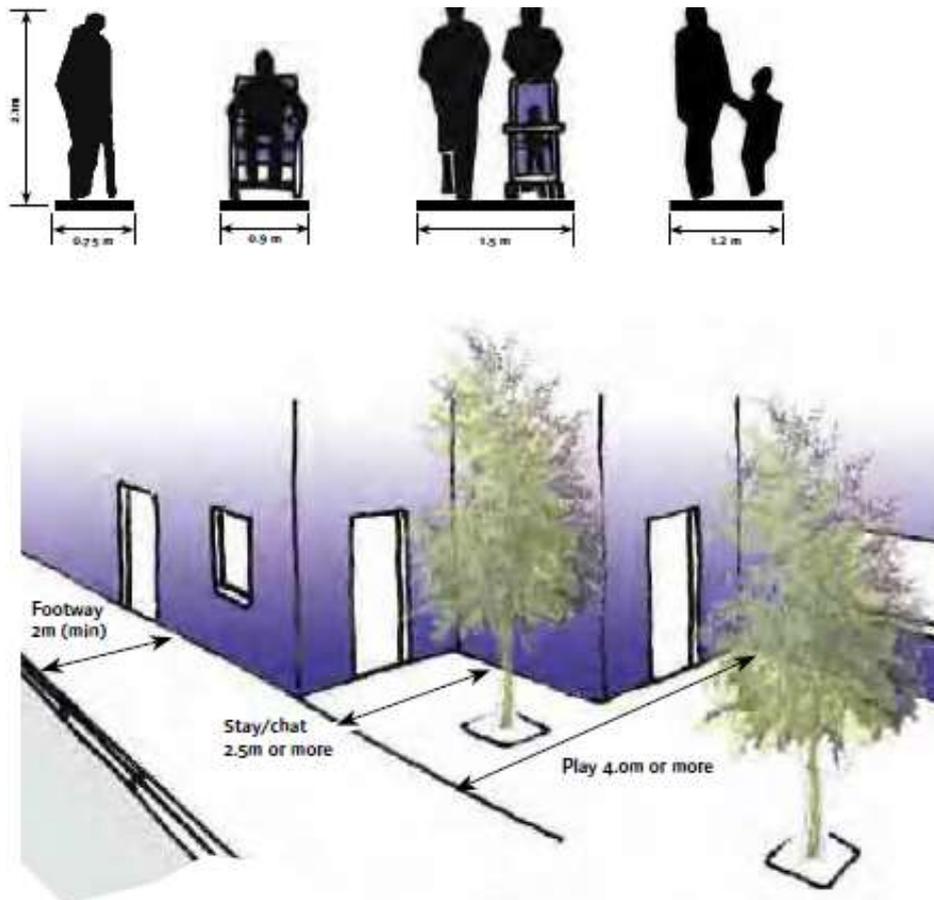


Figure 6.8 The footway and pedestrian areas provide for a range of functions which can include browsing, pausing, socialising and play.

6.3.20 Inclusive Mobility gives guidance on design measures for use where there are steep slopes or drops at the rear of footways.

6.3.21 Places for pedestrians may need to serve a variety of purposes, including movement in groups, children's play and other activities (Fig. 6.8).

6.3.22 There is no maximum width for footways. In lightly used streets (such as those with a purely residential function), **the minimum unobstructed width for pedestrians should generally be 2 m.** Additional width should be considered between the footway and a heavily used carriageway, or adjacent to gathering places, such as schools and shops. Further guidance on minimum footway widths is given in Inclusive Mobility.

6.8.13 The design of new developments should **not require waste bins to be left on the footway as they reduce its effective width. Waste bins on the footway pose a hazard for blind or partially sighted people and may prevent wheelchair and pushchair users from getting past.**

2.3 Inclusive Mobility - Department of Transport

2 Basic human factors information

2.1 Definitions

It is essential that design for people with mobility impairments should be to the highest possible standards. This requires knowledge of the capabilities of different types of person. This section provides information on the basic human requirements for ease of movement. In designing or modifying facilities the aim should be to be generous in the allocation of space.

The term disability is a broad one. It includes people with physical, sensory or mental impairment; at a **conservative estimate between 12 and 13 per cent of the population** have some degree of impairment. Many, though not all, face barriers to movement in the environment. This guide is intended to show how these barriers can be removed or at least reduced, but it does have a wider relevance because there are many other people not conventionally considered to have a disability who also encounter barriers to movement.

People with small children, people carrying heavy shopping or luggage, people with temporary accident injuries and older people can **all benefit from good design of the**

pedestrian and transport environment. Without a barrier free environment, many of these people will be mobility impaired.

While it is true that there are many aspects of design in the pedestrian environment that are helpful to all or most disabled people (and many others as well) there are also some specific facilities needed by people with a particular kind of impairment.

Manual wheelchair users need sufficient space to be able to propel the chair without banging their elbows or knuckles on door frames or **other obstacles**. But someone who walks with sticks or crutches also needs more space than a non-disabled walker; so too does a long cane user or person carrying luggage, **or a lot of shopping bags, or with small children**. Thus providing adequate clear space on pavements, along passages in public buildings, through doorways etc, is of benefit to many people.

The DDA defines a person as having, a disability if he has a physical or mental impairment which has a substantial and long term adverse effect on his ability to carry out normal day-to-day activities.

There are various ways or models used to define disability, but in functional terms this guide is mainly concerned with the following:

Locomotion, **which includes people who use wheelchairs and those who can walk but only with difficulty often using some form of aid such as a stick or walking frame.** **Approaching 70% of disabled people have locomotion difficulties: those with walking difficulties outnumber wheelchair users by about 10:1.**

Seeing, which can be sub-divided into blind and partially sighted people. It is estimated by the Department for Work and Pensions (DWP) that there are almost two million people in Great Britain with a significant sight loss.

Hearing, which can also be sub-divided into those who are profoundly deaf and those with impaired hearing, ranging from severe to mild deafness. The Royal National Institute for Deaf People (RNID) estimates that there are over eight million deaf or hard of hearing people in the UK of whom approaching 700,000 are severely or profoundly deaf.

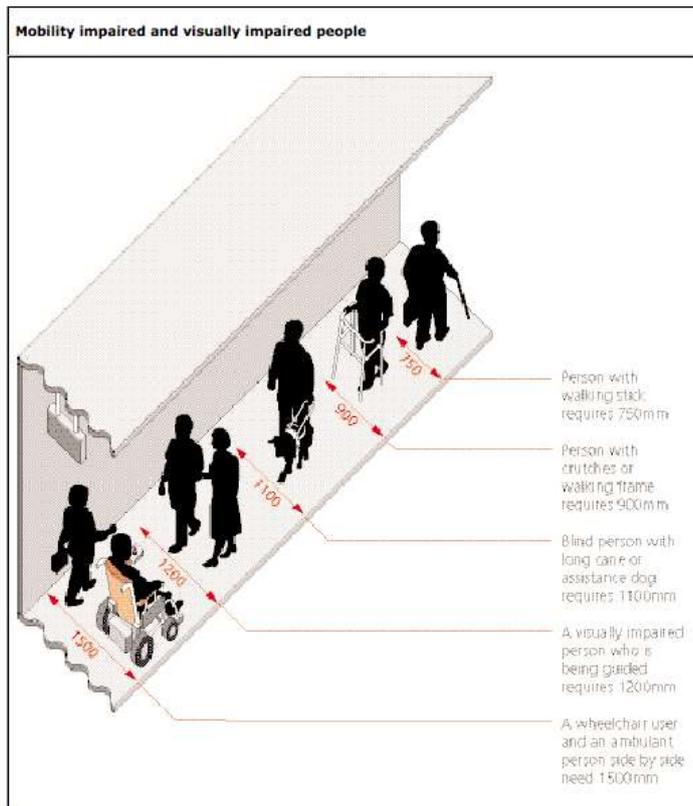
Reaching, stretching and dexterity, frequently the result of arthritis, which can make these movements painful and difficult, or of muscular dystrophy causing a loss of muscular strength, or of complaints of the nervous system.

Learning disability, making it hard to understand complicated information or to use complex machines (like some ticket machines). It should be remembered that these categories are not mutually exclusive.

Many disabled people, particularly older people, have more than one impairment. The following paragraphs give some basic information on the space needed by people when they are standing or moving. Of course there is a lot of variation in this, but if the dimensions given below are used then the great majority of disabled people will be able to move around buildings and the environment much more easily.

2.2 Mobility impaired and visually impaired people

Someone who does not use a walking aid can manage to walk along a passage way less than 700mm wide, but just using a walking stick requires greater width than this; a minimum of 750mm. A person who uses two sticks or crutches, or a walking frame needs a minimum of 900mm, a blind person using a long cane or with an assistance dog needs 1100mm. A visually impaired person who is being guided needs a width of 1200mm. A wheelchair user and an ambulant person side-by-side need 1500mm width.



2.3 Wheelchair users

3 Footways, footpaths and pedestrian areas

The distinction between a footway and a footpath is that a footway (usually called the pavement) is the part of a highway adjacent to, or contiguous with, the carriageway on which there is a public right of way on foot. A footpath has no contiguous carriageway. Where reference is made to one, it can generally be regarded as applying to the other for design purposes.

3.1 Widths

A clear width of 2000mm allows two wheelchairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. Where this is not possible because of physical constraints 1500mm could be regarded as the minimum acceptable under most circumstances, giving sufficient space for a wheelchair user and a walker to pass one another. The absolute minimum, where there is an obstacle, should be 1000mm clear space. The maximum length of restricted width should be 6 metres (see also Section 8.3). If there are local restrictions or obstacles causing this sort of reduction in width they should be grouped in a logical and regular pattern to assist visually impaired people.

The extracts above demonstrate the issues relating to Birch Lee safety for pedestrians as I have laid out in the Footpath and Pedestrian Safety section of this document.

2.4 Crawley Borough Council Policy

I have highlighted below the Crawley Borough Council policies that are not being adhered to as part of this application.

CRAWLEY BOROUGH COUNCIL PLANNING COMMITTEE - 29 September 2020 REPORT NO: PES/355(a)

*PLANNING CONSIDERATIONS:-
Crawley Borough Local Plan 2015-2030*

4.2 The following policies from the Crawley Borough Local Plan (adopted December 2015) are most relevant to the proposal:

Policy CH1 (Neighbourhood Principles) states that the neighbourhood principle would be enhanced by maintaining the neighbourhood structure of the town with a clear pattern land uses and arrangement of open spaces and landscape features.

This proposal will not enhance the neighbourhood for the current residents of Tinsley Lane East for the reasons stated in this document.

Policy CH2 (Principles of Good Urban Design) states that in order to assist in the creation, retention or enhancement of successful places. In particular, development proposals will be required to:

“(a) respond to and reinforce locally distinctive patterns of development and landscape character and to protect and/or enhance heritage assets,

This proposal is not in keeping with the local neighbourhood character as stated by the Tinsley lane Residents association and many of the people who have written to the council objecting to the plans.

The number of homes and the fact that a number will be 3 stories high is a major issue.

(b) create continuous frontages onto streets and spaces enclosed by development which clearly defines private and public areas,

(c) create public spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society including disabled and elderly people,

See my comments under the Section Footpath and Pedestrian Safety Birch Lea

(d) *make places that connect with each other and are easy to move through,*

See my comments under the Section Footpath and Pedestrian Safety Birch Lea

(e) *provide recognisable routes, intersections and landmarks to help people find their way around,*

(f) *consider flexible development forms that can respond to changing social, technological and economic conditions,*

(g) *provide diversity and choice through a mix of compatible development and uses that work together to create viable places that respond to local needs”.*

Policy CH3 (Normal Requirements of All New Development) states all proposals for development in Crawley will be required to make a positive contribution to the area; be of a high quality design, provide and retain a good standard of amenity for all nearby and future occupants of land and buildings and be able to meet its own operational requirements necessary for the safe and proper use of the site.

The proposed access route would affect the quality of life for the residents of Birch Lea and other local residents. This view was supported by local Council representatives, nothing materially has changed in the new proposal with regards Birch Lea as the access point. See below

Ian Irvine (Lab, Broadfield) said using Birch Lea would affect the quality of life of those residents and called on Homes England to come up with a better idea.

Liam Ascough (Con, Gossops Green & North East Broadfield) agreed.

He said: “I do agree we obviously need more housing in Crawley – however I disagree when it’s a detriment to existing residents.

“Birch Lea will be too difficult and will cause too many issues for the residents living there now.”

My safety concerns have been highlighted in the Footpath and Pedestrian Safety Birch Lea Section.

Policy CH6 (Tree Planting and Replacement Standards) requires landscape proposals for residential development to contribute to the character and appearance of the town by including at least one new tree for each new dwelling. In addition, any trees lost as a result of the development must be replaced or mitigated. Where possible the trees are expected to be provided on site although, where this is not feasible, commuted sums will be sought

in lieu.

See Section 4.0 of this document

Policy H1 (Housing Provision) the Council will positively consider proposals for the provision of housing to meet local housing needs, ensuring that town-cramming or unacceptable impact on the planned character or neighbourhoods or residential amenity do not result.

See above Policy CH2 (a)

Policy ENV2 (Biodiversity) states that all development proposals will be expected to incorporate features to encourage biodiversity where appropriate.

The loss of a wild meadow to football pitches does not constitute encouraging biodiversity.

Policy ENV5 (Provision of Open Space and Recreational Facilities) states that the impact of the increased population from residential development on open space and recreational facilities across the Borough will be mitigated by the use of the Community Infrastructure Levy which will be used to enhance existing areas of open space. This Policy requires development to make provision for open space and recreational facilities.

As above

Policy ENV10 (Pollution Management and Land Contamination) states where a site is known or suspected to be at risk from contaminants or materials that present a hazard to health, information must be provided detailing the methodology through which risks will be addressed, and ensuring the treatment and/or removal of all such contaminants and materials prior to the commencement of development.

The Planning Application Form states in section 6. Existing Use - Land where contamination is suspected for all or part of the site Answer – Yes. I have not seen any information regarding the methodology through which the risk will be addressed.

Policy ENV11 (Development and Noise) advises that residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise disturbance from existing or future uses. To achieve this, this policy should be read in conjunction with the Local Plan Noise Annex.

Has the additional runway (use of emergency runway as fully operational) at Gatwick proposed for 2023 coinciding with this new development been considered alongside the already significant noise pollution from the goods yard and the current airport noise.

Policy ENV12 (Air Quality) states that development proposals that do not have a material negative impact upon air quality will normally be permitted. The policy seeks assessment of the air quality implications of appropriate schemes and, for proposals within an Air Quality Management Area, demonstration of mitigation measures.

See the section under Air Quality for my response.

Policy IN1 (Infrastructure Provision) states that development will be permitted where it is supported by the necessary infrastructure both on and off site and if mitigation can be provided to avoid any significant cumulative effects on the existing infrastructure services. The council will seek to implement a Community Infrastructure Levy (CIL) through the relevant processes. The rate will be set following the adoption of the Charging Schedule.

See the section Birch Lea Access / Increased Traffic

Policy IN3 (Development and Requirements for Sustainable Transport) advises that development should be concentrated in locations where sustainable travel patterns can be achieved through the use of the existing transport network, including public transport routes and the cycling and walking network. Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety.

See the section Birch Lee Access / Increased Traffic / Footpath and Pedestrian Safety

Principle of the development

5.5

The main change since the adoption of the Local Plan and Development Brief has been the increase in the numbers of dwellings proposed to “up to 150.” This raises a number of issues regarding the capacity of the site, its ability to physically accommodate 150 houses with appropriate internal and external space provision and also the resulting impact, such as potential overlooking and vehicle movements, upon existing residents in the surrounding area.

These issues still remain with the revised proposal, a reduction of 12 dwellings does not alter the significant impact on local residents as laid out in this document.

5.6

The applicant, in responding to officers’ concerns, has highlighted Crawley’s housing needs, its unmet needs within the Borough and the potentially increased provision to meet the Government’s New Standard Methodology. Whilst recognising that the additional 30 (Now 18 with revised proposal) dwellings above the Local Plan allocation would help to

meet the town's needs, officers do not accept that this alone justifies the higher number. The Forward Planning team has commented that "whilst Crawley has a known housing need above that which can be accommodated within its boundaries, this 'unmet need' figure was recognised by the Local Plan Inspector and has been accounted for within the Local Plans for Mid Sussex (2018) and Horsham (2015) districts." They also confirm that Crawley is currently exceeding the Local Plan's annualised average housing delivery figure of 340 dwellings per annum. That said, policy H1 of the Local Plan takes a positive approach to housing proposals which meet local housing needs and will consider all reasonable opportunities for development, whilst guarding against town cramming or unacceptable amenity impacts. Therefore, whilst it is not considered that Crawley's needs justifies the higher number in its own right, national and local policy requires careful assessment of proposals to help make the best use of land. The capacity of the site is addressed in greater detail below.

The above demonstrates that there is no pressing need to build on the Land East of Tinsley lane and the Council is exceeding its obligations per year. The proposed huge development around Ifield circa 10,000 dwellings, the sale of Cottersmore Golf Club for housing brings into perspective how insignificant this proposal is in the greater scheme of things and other wider West Sussex housing plans. This does call into question the need to develop this land and why the planning officer is hell bent on doing so, despite all of the objections and the recent rejection of the plan by all 10 councillors.

Sports provision

5.11 A key policy requirement is to ensure that sports provision, in terms of both capacity and quality, is not harmed as a result of the proposed development. This requirement has played a significant role in shaping the layout and phasing of the development. Originally, a replacement full size grass pitch, with related facilities, was proposed on the northern part of the site to relocate Oakwood FC. Alongside it, a smaller junior 3G artificial pitch was proposed.

The capacity has clearly been reduced from 4 to 2 pitches with one replacement being a 9 a side. The capacity and quality of the Oakwood Sport facilities for the multiple Teams would undoubtedly be harmed in contravention of the above policy

5.12 As well as being used by the Oakwood first team, the site has also been used in recent years by the reserves, Under 18s, Crawley Wasps ladies first team and by a significant number of junior teams. Sport England raised concerns that the full size grass pitch initially proposed by the applicant would be unable, due to wear and tear, to accommodate use by Oakwood first team, reserves, Under 18s and Crawley Wasps ladies first team. They were concerned too that the smaller artificial pitch would provide

insufficient capacity for the junior teams using the wider site currently and also that some of the older junior teams required a larger pitch anyway. Sport England therefore objected to the initial proposal for relocation of the sports pitches.

I'm not sure the revised plan is viable given the inaccuracies of the information relating to the number of teams and assumption that the central area is used mainly for training which is clearly not true.

Strategic Policy OS1: Open Space, Sport and Recreation

Proposals that remove or affect the continued use of existing open space, sport and recreational spaces will not be permitted unless:

- a) An assessment of the needs for open space, sport and recreation clearly show the site to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Whilst a site may be surplus to requirements as open space it may still be of environmental or cultural value; or the site's development may have unacceptable visual or amenity impact, or adversely affect its wider green infrastructure functions, including for climate change mitigation. Therefore, applicants should also carefully consider the character, landscape, biodiversity and other environmental policies in the Plan.

- a) The site is not surplus to requirements as evidenced by the significant number of teams using the existing facilities.**
- b) The loss will not be replaced by equivalent or better provision, the plan loses 4.2 ha and creates 2.7ha, a net loss of 1.5ha**
- c) No development of alternatives are being considered**

The proposal does not meet Strategic Policy OS1.

5.13 The Local Plan inspector stated in his report that *"the issue is whether the loss of the central area, which appears to be used mainly for training, would be adequately compensated by the provision of an STP (Synthetic Turk Pitch) pitch alongside the senior pitch on the one playing field that would remain. Provided the STP pitch is large enough for youths and training (Sport England advises 79m x 52m), and wider club/community use can be secured, then despite the quantitative loss there would be a small enhancement to the existing provision in terms of capacity for use ... In these circumstances I consider that the allocation would satisfy NPPF paragraph 74, which seeks to protect existing open spaces (including playing fields) from development in terms of quantity and quality unless equivalent or better replacement provision is made..."* In assessing the scheme, officers and Sport England have assessed as far as possible whether there have been any material changes in use since the Local Plan examination. It has proved difficult to ascertain a clear picture of existing use by the various football clubs using the site. However, although there has potentially been a slight increase in adult

teams (such as Crawley Wasps) and older junior teams using the pitches, any change appears limited. In addition, some of these teams appear not to play matches on a weekly basis. Officers have concluded that there is insufficient evidence to support any increase in the area of playing pitches to be provided beyond that assessed at the Local Plan examination.

3G pitches are often made from used car tyres and contain chemicals such as lead, mercury and benzene. In the Netherlands more than 100 clubs have banned their use for youth games after analysis of 60 showed carcinogen levels to be up to six times higher than would be allowed for consumer products.

I live in Kenmara Close and back on to Oakwood Football Club central area, the statement *'loss of the central area, which appears to be used mainly for training'* is simply not true. I witness multiple matches every weekend and during the week, alongside regular training sessions. I'm happy to provide photographic evidence if required.

As I write this on Saturday the 19th June 10:00 a match has just started on the central section, this is now a weekly occurrence. Today Sunday 20th June 12:09 as I finalise this document, another football match is taking place on the central section, definitely not only used for training.

The Teams registered on the Oakwood Website are detailed below

SENIOR

Men's 1st Team
Mens U23's
Oakwood Kent Ladies

BOYS YOUTH

U11 Boys
U10 Boys RED MSYMFL
U15's Boys (Blue) MSYMFL
U12 Boys Red MSYMFL
U15's Boys (Red) Horsham
U15's Boys (Black) MSYMFL
U8's Boys
U18's Boys
U16's Boys (Black) Epsom
U16's Boys (Red) Mid Sus
U16's Boys (Mid Sussex)
U14's Boys Tandridge
U11's Boys MSYMFL
U10's Boys (Black) MSYMFL
Mini Oaks Dev Centre

GIRLS YOUTH

U13 Girls (Red) Surrey

U13s Girls (Black) SCWGFL

U11's Girls SCWGFL

U18's Girls Surrey

U15's Girls

U15's Girls (SCWGFL)

U13's Girls Blue SCWGFL

Wildcats Dev Centre

Excluding the 1st Teams, the Fixtures Calendar on the Web Site for 2023 shows 14 games in February, 17 games in March and 19 games in April.

There are Three / Four* current pitches accommodating at least 20 teams as shown above, taken from the Oakwood FC Web Site, reducing to one full and one 9 a side pitch. This does not equate to a small enhancement or quantity equivalent.

***The configuration changes in the central section from 2 full size to 1 full size and 2 junior pitches.**

The above summary of the fixtures for Feb, March and April 2023, clearly demonstrates the significant number of matches played on the Centre playing field and not just training.

5.15 The pitch sizes are unchanged, but the provision of a larger artificial, rather than grass, pitch will allow more regular use. This would enable it to cope successfully with wear and tear from use by the four adult senior teams. This pitch would also be able to contribute towards meeting training needs of the clubs and enable use for junior matches. The smaller grass pitch would be used for junior teams' training and matches.

The junior pitch would need to accommodate up to 20 Junior Teams, this is just not feasible.

5.16 The proposed development would involve the loss of existing sporting facilities. Therefore, in responding to the revised proposal, Sport England has assessed the scheme against exception 4 of its playing pitch policy. This states that:

“The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- *of equivalent or better quality, and* **Not True**
- *of equivalent or greater quantity, and* **Not True**
- *in a suitable location, and*
- *subject to equivalent or better accessibility and management arrangements.”*

5.31 The Council's Refuse and Recycling team commented on the initial and revised masterplan, stating that they had concerns about the accessibility of the refuse/recycling stores for collection vehicles and the possible pull distances involved. This, together with the size and capacity of the stores for any flats, would need to be addressed by any Reserved Matters application. As a detailed point, it is considered that it can satisfactorily be addressed by condition at this outline stage.

5.33 The new residential element of the proposal would be accessed through Birch Lea, along which the applicant proposes highway works. These works would remove some of the existing grass verge to widen and realign the carriageway and to provide three new parking bays. A new footpath would be created on the northern side of the road. The proposed new sports facilities would be accessed through Kenmara Court. Kenmara Court would be more formally laid out, with dropped kerbs provided to existing driveways. Other than an emergency access and a pedestrian link, there would be no direct connection for vehicles between the north (sports) and south (residential) sections of the proposed development.

The new footpath has been removed in the revised proposal creating a single narrow footpath which doesn't meet the required standards and is dangerous to pedestrians. See section on Footpath and Pedestrian Safety.

Kenmara Court Club Access and Emergency Access sheets don't show any footpath/pedestrian link to the Football Club or onward to the residential Section. This means no pedestrian access to the football club with vehicle access only,

creating the need for increased parking, pick up and drop off facilities.

No pedestrian access to the residential area to Tinsley Lane via Kenmara Court therefore all pedestrian access is via Birch Lea with the risks I have highlighted in the Footpath and Pedestrian Safety Section.

5.40 The proposed residential development is anticipated to generate 83 morning peak and 84 evening peak two way vehicle movements using Birch Lea. The modelling undertaken shows that the junctions of Birch Lea/Tinsley Lane and Tinsley Lane/Gatwick Road would both continue to operate satisfactorily. In terms of mitigation, although not strictly required as a result of the proposed development, a traffic calming scheme along Tinsley Lane is proposed by the applicant. This would be the subject of further consultation with local residents, but could help to address existing and future parking and traffic flow issues.

138 houses with the associated cars generating approximately 343 vehicle movements per day, an average of one every 2.8 minutes, increasing to 446 by 2026

See Section on Birch Lea.

2.5 Crawley Guidelines for Planning

I have included excerpts from the Crawley guidelines for planning to illustrate where this proposal does not comply with your own standards.

As a general point and following the TLA Residents association meeting an underlying trend is for Crawley Council and West Sussex County Council to ignore their own guidelines when it suits their own agenda as demonstrated in this response.

Tree Planting and Replacement Standards

The plan suggests that 17 trees will be removed with a further 20 at risk. Depending on the size of those trees and in accordance with your standards a minimum of an additional 175 trees is required to comply with your policy (Assumes all removed trees are less than 19.9 cm diameter), I don't see this on the plan.

Air Quality

The air quality review is inaccurate, I refer to the Section Air Quality.

Minimise the impact of lighting to avoid blurring the distinction between urban and rural areas and in areas which are intrinsically dark to avoid light pollution to the night sky;

The proposed site has no street lights and is intrinsically dark, this development will introduce street lights and go against the above guidelines and directly impact the light into the houses backing on to the current fields.

Does not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value;

138 houses with the associated cars generating approximately 343 vehicle movements per day, an average of one every 2.8 minutes generating a significant amount of noise in an area that is currently undisturbed by noise and valued for its recreational value. This number will increase to 446 by 2026

Does not generate traffic of a type or amount inappropriate to the rural roads; and viii. Does not introduce a use which by virtue of its operation is not compatible with the countryside.

An additional 343 vehicle movements, increasing to 446 by 2026 on what is essentially a country lane goes against the above policies, particularly down a current cul de sac. Birch Lee **with a proposed minimum road width of 5.5 m and a small country lane, Tinsley Lane.**

ensuring the neighbourhood centres remain the focal point for the local community,

providing facilities that meet their day-to-day needs within walking distance

The only access to local amenities will require all new residents walking through the one and only entry and exit point requiring a significant distance to walk to existing facilities. See notes regarding local facilities and the distances beyond 800m.

Progress towards Crawley's commitment to being carbon neutral by 2050 and adapts to climate change;

The cumulative impact of this development plus those on Manor Royal / Gatwick Road, Forge Wood is encouraging a significant amount of additional traffic to the area and goes against the desire to become carbon neutral, the placement of this development encourages people to have cars in order to realistically commute to other areas of Crawley.

Provides a safe and secure environment for its residents and visitors;

The placement of this development is in a secluded area with woods all around, which creates a higher risk environment for crime, I have not seen any police presence in this area for years.

I genuinely believe the proposed access via Birch Lea is not safe for pedestrians as detailed in the Footpath and Pedestrian Safety Section.

create public spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society, including disabled and elderly people;

The proposed access is considering vehicles and does not consider the needs of elderly and disabled in using mobility scooters and having to cross multiple driveways on a narrow pavement with parked cars and a blind bend, this is not safe, not attractive, cluttered with cars and hazards.

make places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport networks;

No connection to existing cycle routes and all access is through a single access point for all traffic, pedestrians, cyclists and mobility scooters, wheelchairs etc. This proposal does not put people before traffic, the whole design is focused on the traffic concerns for access and does not include adequate pavement and cycle access for 138 houses. Ease to move through is not compatible with a single access point for 138 households. Bin lorries collecting refuse will stop access in and out of the development on collection days as will delivery and supermarket delivery Trucks and Vans

Lack of adequacy for parking, loading and turning in Birch Lee, the proposed access point.

Access onto Gatwick Road will not allow Ease of movement, regularly the entire

road is queued during rush hour encouraging 'rat run' traffic down Tinsley Lane.

Applications must include information that demonstrates that these principles would be achieved, or not compromised, through the proposed development

As above

All proposals for development in Crawley will be required to:

c) Provide or retain a good standard of amenity for all existing and future occupants of land and buildings, including compliance with internal standards for new dwellings as set out in Policy CH5, and not cause unreasonable harm to the amenity of the surrounding area by way of overlooking, dominance or overshadowing, traffic generation and general activity, for example noise, smells and/or vibration;

The current illustrative proposal will create an issue with overlooking and privacy with homes being built with a view directly into 3 bedrooms and the garden of my property which currently have nothing overlooking the property.

Traffic and noise have been mentioned earlier and will be in breach of the above requirement given the size of the development and single access point.

d) Retain existing individual or groups of trees that contribute positively to the area and allow sufficient space for trees to reach maturity. Sufficient space should also be provided in private gardens that would not be overshadowed by tree canopies; and proposals should ensure that rooms within buildings would receive adequate daylight. Where a development is proposed or where trees would be lost to development, tree planting should accord with the standards set out in Policy CH6; CRAWLEY 2030: CRAWLEY BOROUGH LOCAL PLAN 2015 – 2030 CRAWLEY BOROUGH COUNCIL DECEMBER 2015 29

Trees mentioned in Section 4.0

e) Demonstrate how “Secure by Design” principles and guidance set out in “Secured by Design” design guide (as amended) have been incorporated into development proposals to reduce crime, the fear of crime, anti-social behaviour and disorder. For all development, the potential impact on community safety must be carefully considered at the earliest opportunity to ensure that measures are integrated into proposals without compromising other objectives;

Mentioned above the location is secluded and has significant areas of woodland which could attract anti social behaviour and potential criminal activity, drug dealing, illegal drinking, drug taking, etc.

f) Meet the requirements necessary for their safe and proper use, in particular with regard to access, circulation and manoeuvring, vehicle and cycle parking, loading and unloading, and the storage and collection of waste/recycling; and

As mentioned above access is a major issue through a single narrow access with parking bays and multiple driveways, pedestrians, cyclists, Bin Lorries, delivery vehicles, vehicles manoeuvring all adding to a significant safety issues against the above recommendations.

Street Design and Parking 2.24

Streets take up a large amount of the public realm and play a critical role in facilitating movement through urban areas. Therefore, the layout and design of streets is integral for the success of the urban environment. Effective street layout and design should:

- Improve the legibility of a place;
- Reduce crime;
- Encourage walking and cycling and recognise that pedestrians should be prioritised;
- Improve sustainability through the use of appropriate materials;
- Improve sustainability through encouraging lower speeds and, consequently, reducing vehicle emissions;
- Improve safety through encouraging reduced speeds along residential streets;
- Be flexible in use;
- Be inclusive in its design.
- Be permeable, that is, provide many ways to get from point A to point B

The above principles have not been adhered to in particular Encourage walking and cycling and recognise that pedestrians should be prioritised; See section on Footpath and Pedestrian Safety

3.0 Housing Density and Land Use

Land Use	New Proposal	Old Proposal	Variance
Total Land	11.62	11.70	-0.8
Sports	2.53	2.34	0.19
Open Space	1.23	1.46	-0.23
Green Space	4.60	4.80	-0.20
Residential	3.05	2.85	0.02
Access	0.19	0.25	-0.25

Design and Access Statement Executive Summary

An increase in the quantity of public space

According to the numbers above the new plan is a reduction in public space, green space reduce by 0.2 ha, open space reduced by 0.23ha with an increase on sports space by 0.19ha, a net loss of 0.24ha against the old proposal.

The residential space has increased by 0.2 ha, the overall land has some how reduced by 0.08 ha, with the sports space increasing by 0.19ha and, more worryingly, the green space has reduced by 0.2ha, presumably this is loss of the ancient woodland in Summersvere Woods. The variance in the numbers does call into question the accuracy of the planning application compared with the previous submission.

In summary more space allocated to residential and sports use, loss of woodland, loss of green space, hardly an improvement on the previous proposal, the density may have reduced marginally but at the expense of woodland and green space.

The housing density on the new proposal within the space set a side for residential use is 45.24 dwellings per hectare. The design statement states 32 per hectare, this must include open space in the calculation. The actual calculation is 32.24 dwellings per hectare

The old proposal shows 34.8 dwellings per hectare a reduction of 2.56 dwellings per hectare equating to a 7.3% reduction, I don't believe this makes a material enough difference to change the original decision to reject the proposal on density grounds,

The surrounding area varies from 15-25 per hectare with the new proposal ranging from 25-45 and therefore the new proposal is not in keeping with the existing neighbourhood.

There is a clear discrepancy between the old proposal and new, the old states, *Primary land use is residential*, the latest one states *Predominant land use is open space*, I suspect this is in an attempt to soften the impact for readers to try to get the application approved

The previous plan states that the residential area covers 18% of the total area the latest is silent, I have calculated that this has increased to 26.24%. I suspect the previous calculation was incorrect and the figure should have been closer to 24.35%. There is still a 2% increase in the residential area or 8% if you use the original figure.

Proposed Housing Mix

	New Proposal	Old Proposal	Variance
3 Storey	32	28	4
2.5 Storey	32	35	-3
2 Storey	15	27	-12
1 Storey	59	60	-1

-

The overall reduction is 12 dwellings, unfortunately these are all 2 storey dwellings that are the closest match to the surrounding area, making the latest proposal even further away from being in keeping with the current neighbourhood.

To make things worse the latest plan increases the ugly and out of character 3 Storey dwellings by 4, replacing lower 2.5 and 1 storey building, again not in keeping with the local area.

The new proposal loses 22 bedrooms across 12 dwellings, mostly in the 2 bedroom dwellings. In summary, the main loss from the new proposal are 12 x 2 bedroom, 2 storey houses. I suggest these are probably the most needed and popular for young families.

The planner clearly doesn't understand the concerns of the local community and the objections raised by the councillors.

4.0 Air Quality

November 2014 Topic Paper 3 Housing Land Supply for the Crawley Borough Local Plan 2015-2030 was published.

The extract below clearly shows those areas where housing will not be considered, you can see from the extract that '**Land which is significantly affected by poor air quality (within the proposed Air Quality Management Area at Tinsley Lane)**' is **excluded, specifically**

3.) Land with designations preventing housing that will not be considered as part of the assessment (excluded)
Land which is significantly affected by noise that would be unsuitable for residential development (66dBA) for significant development (100+ dwellings), 69dBA for developments of 99 units or less (including that land affected from a second wide-spaced runway option at Gatwick Airport).
Land which is significantly affected by poor air quality (within the proposed Air Quality Management Area at Tinsley Lane)
Land designated as Ancient Woodland and/or a Local Green Space.
Land within the functional floodplain (Zone 3b) as identified in Crawley's Strategic Flood Risk Assessment (November 2013)
Land within the area safeguarded from development for a second wide-spaced runway at Gatwick.

Extract From Homes England Design and Access Statement 10/05/221

The layout needs to avoid locating new development within the Air Quality Management Area along the southern boundary.

Both statements made in 2015 and 2021 are saying that the area within the AQMA should not be developed, in 2015 it specifically called out Tinsley Lane. The area for development falls within the Planning Application.

Pollutants Declared

- 09/07/2015, Nitrogen dioxide NO₂ - Annual Mean

Hazelwick Air Quality Management Area (Crawley Borough Council)

09/07/2015, The Area outlined in red on the map attached to the Order is designated as the air quality management area. The designated area incorporates The land and properties bordering the Hazelwick Roundabout. The land and properties bordering both sides of the A2011, Crawley Avenue, between Junction 9 of the M23 and the Tushmore Roundabout. The land and properties bordering the Hazelwick Roundabout and the roundabout at Bycroft Way. The roads listed in Table 1 accompanying the map of the designated area.

Below are copies of the Air Quality Management Orders issued in 2015 and 2021, clearly demonstrating that the air quality has not improved in 6 years, indeed the problem has got worse as the boundary has now been extended to Three Bridges. This view is supported by the 2020 Air Quality Annual Status Report as shown below'

The additional vehicle movements generated by the proposed site, to and from the Hazlewick roundabout, will only add to the growing problem. Tinsley Lane, Tinsley Lane South, Tinsley Close and Harewood Close have all been named within the Management Order.

Model Air Quality Management Order
Environment Act 1995 Part IV Section 83(1)

Crawley Borough Council

Air Quality Management Order

Crawley Borough Council, in exercise of the powers conferred upon it by Section 83(1) of the Environment Act 1995, hereby makes the following Order.

This Order may be cited/referred to as the Crawley Borough Council Hazelwick Air Quality Management Area and shall come into effect on 9th July 2015

1. The area shown on the attached map in red is to be designated as an air quality management area (the designated area).
2. The designated area incorporates:
 - The land and properties bordering the Hazelwick roundabout.
 - The land and properties bordering both sides of the A2011 Crawley Avenue between Junction 9 of the M23 and the Tushmore Roundabout.
 - The land and properties bordering Hazelwick Avenue between the Hazelwick roundabout and the roundabout at Bycroft Way.
 - The Roads listed in the table accompanying the map of the designated area below: Table 1. AQMA ROADS
3. This Area is designated in relation to a likely breach of the nitrogen dioxide (annual mean) objective as specified in the Air Quality Regulations 2000.
4. This Order shall remain in force until it is varied or revoked by a subsequent order.

The Common Seal of Crawley Borough Council was hereto affixed on

the 9th day of July 2015


Authorised Signatory


Authorised Signatory



Appendix A

Draft

Crawley Borough Council Air Quality Management Order 2021

Crawley Borough Council

Environment Act 1995

Section 83

AIR QUALITY MANAGEMENT ORDER

This order is made by Crawley Borough Council (“the Council”) pursuant to section 83 of the Environment Act 1995.

PRELIMINARY

1. The Council designated the Crawley Borough Council Hazelwick Air Quality Management Area by order dated 9 July 2015 (“the Hazelwick AQMA Order”).
2. It appears to the Council, as the result of its annual review and assessment of air quality, that the annual mean nitrogen dioxide objective as specified in the Air Quality Regulations 2000 is not being achieved within the area outlined in red on the plan in Schedule 1 which comprises the whole of the designated area under the Hazelwick AQMA Order and an area adjacent thereto.
3. On 10 March 2021 the Council resolved to vary the Hazelwick AQMA Order to extend the designated area.

VARIATION

4. By this Order the Council varies the Hazelwick AQMA Order.
5. The designated area under the Hazelwick AQMA Order is extended and shall include all the land and properties within the red line in the plan in Schedule 1 (“the Modified Designated Area”). A list of the roads within the Modified Designated Area are listed in Schedule 2.
6. This order may be cited as the **Crawley Borough Council Air Quality Management Area Order 2021**, and shall come into effect on 11 March 2021.

PERIOD FOR WHICH THIS ORDER HAS EFFECT

7. This Order shall remain in force until it is varied or revoked by a subsequent order.

The Common Seal of Crawley Borough Council was hereto affixed on the day of..... 2021

.....

Authorised Signatory

Crawley Borough Council

2020 Air Quality Annual Status Report
(ASR)

In fulfilment of Part IV of the
Environment Act 1995

Local Air Quality Management

Executive Summary

Air Quality in Crawley is mainly good, with national targets being met for all pollutants, with the **exception of nitrogen dioxide (NO₂) at a small number of locations alongside busy roads and within the AQMA**, where the Council is targeting actions to improve air quality. A new site adjacent to the A23 London road also saw a borderline result with concentrations at, but not exceeding the 40 ug/m₃ objective. This latest exceedance was based on incomplete yearly data and will be reviewed when a full year's data is available at next year's ASR to assess if a further amendment to the AQMA boundary is needed.

The latest monitoring data showed NO₂ levels remained more or less constant across Crawley in 2019. There was slight variation, with levels at airport and roadside sites marginally lower than 2018 levels **(except in the AQMA)**, and background sites marginally higher than 2018 levels. This slight year on year fluctuation pattern was also seen regionally, and is likely to be attributable to climatic influences rather than local conditions. It is therefore more informative to look at the long term trends.

The long term monitoring data for Crawley shows that concentrations of nitrogen dioxide have generally fallen throughout the borough since the mid-2000s, despite significant housing and commercial development over the same period. **The only exception to this is within the AQMA where the long term trend continues to be upwards.** The long term downward trend is driven mainly by cleaner engine technologies. However short-term (5yr) trend data, indicates that levels have remained broadly consistent at roadside, background and airport sites in more recent years as the rate of improvement slows. **Increased development and traffic volumes may be a contributing factor in offsetting some of the improvements previously seen,** however, it's too early to say if this plateauing is significant, or whether it is a result of the particularly low concentrations seen in 2015 skewing trends. The review and assessment process will continue to monitor year on year variation and report on them annually.

As shown in Red, increased development and traffic volumes are a contributing factor and therefore should be considered in the context of any new development within the AQMA

Actions to Improve Air Quality

The draft local Plan 2020-2035 was published strengthening environmental policy and guidance through the development control process. Major

development in and around Crawley will have a cumulative impact on air quality and **therefore it is important that new development meets the requirements of planning policies and guidance in relation to air quality.**

See extracts from the 2020-2035 Draft Local Plan below. The proposed planning application does not meet the policy

Conclusions and Priorities

In 2019 there were no exceedances of the objectives for PM₁₀ pollution, or the hourly objective for nitrogen dioxide. The annual mean objective for NO₂ was met at all sites **except within the AQMA where exceedances were measured at sites close to busy roads at the A2011,** and the A2220 commuter corridor into Three Bridges station.

The council's specific priorities for the coming year include:

Formally declare the extension to the existing AQMA boundary to incorporate the new area around Three Bridges railway station.

update air quality modelling and source apportionment for the AQMA to help inform the revision of the current Air Quality Action Plan

Update the AQAP to reflect the extension of the AQMA boundary and any specific measures relating to the new area.

Trends in Roadside NO₂ in Crawley

The short-term (5yr) trend is only slightly downwards for roadside NO₂, and the trend at the Hazelwick roundabout (within the AQMA) is still upwards. This short-term upward trend may be influenced by a number of factors **including increased traffic volumes on local roads**, or the effect of low(er) levels in 2014/15 which have skewed the trend upwards in the following years. The trend will continue to be monitored and reviewed annually through the LAQM process

Fig 3.3a

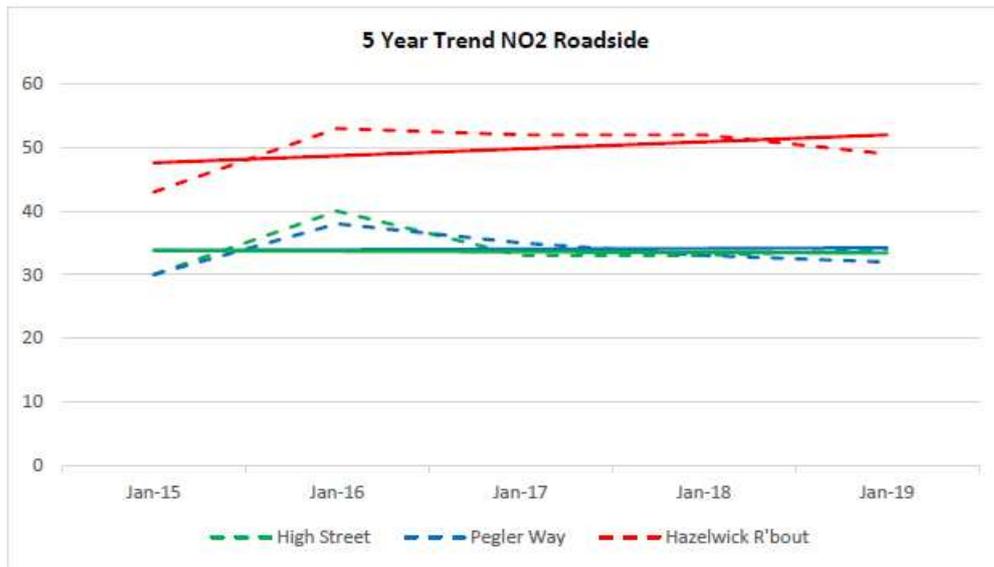
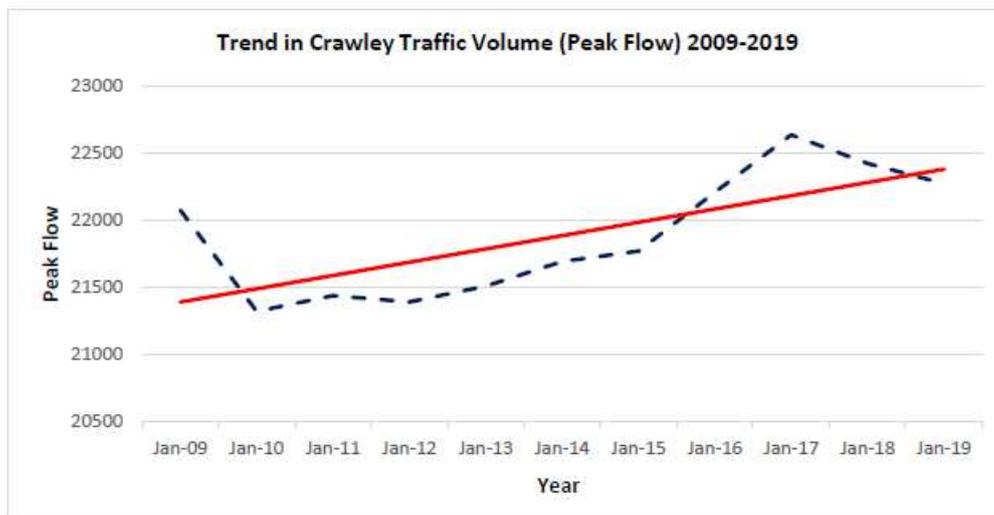


Fig 3.4



Trends in Background NO₂ in Crawley

Fig 3.5 shows the downwards long term trend in NO₂ at background sites is similar to that of other sites (roadside and airport) across Crawley, confirming that background levels of NO₂ have been falling over the last 15 years. The steeper downward slope indicates greater improvement in air quality at background sites over the last decade than those close to busy roads around Crawley and the airport. This helps demonstrate the **contribution vehicle emissions make to poor air quality at roadside locations and supports the argument for restricting residential development close to busy roads.**

Fig 3.5a shows the short term (5 year) trend. The trend is downwards, but, compared to the long-term trend, the rate of improvement is beginning to slow. This may be associated with increased development and traffic volumes in the borough, but climatic factors may be more relevant, with the particularly low concentrations in 2014/15, followed by higher 2016 levels influencing the short term trend. The trend will continue to be monitored and reviewed annually through the LAQM process.

As above in red, supports the argument for restricting residential development close to busy road, the proposed development is adjacent to the busiest road in Crawley. Why is this planning application still going ahead

Trends in AQMA NO₂ in Crawley

Although the trend for background and roadside sites in Crawley is down, **this is not seen at receptor sites within the AQMA where both the long term and short term data is still showing an upwards trend (Fig 3.6 and Fig 3.6a). The impact of major development (2000 dwellings) adjacent to the AQMA continues to be monitored. The council is not in a position revoke or reduce its AQMA boundary, and is currently going through the process of extending its AQMA to incorporate the Three Bridges area where exceedances were identified last year at two locations with relevant exposure (CR93 and CR97).**

Monitoring of the development of 2000 dwellings is required adjacent to the AQMA, the 138 dwelling proposed in this application are partly in the AQMA and adjacent.

Draft Fig 3.6

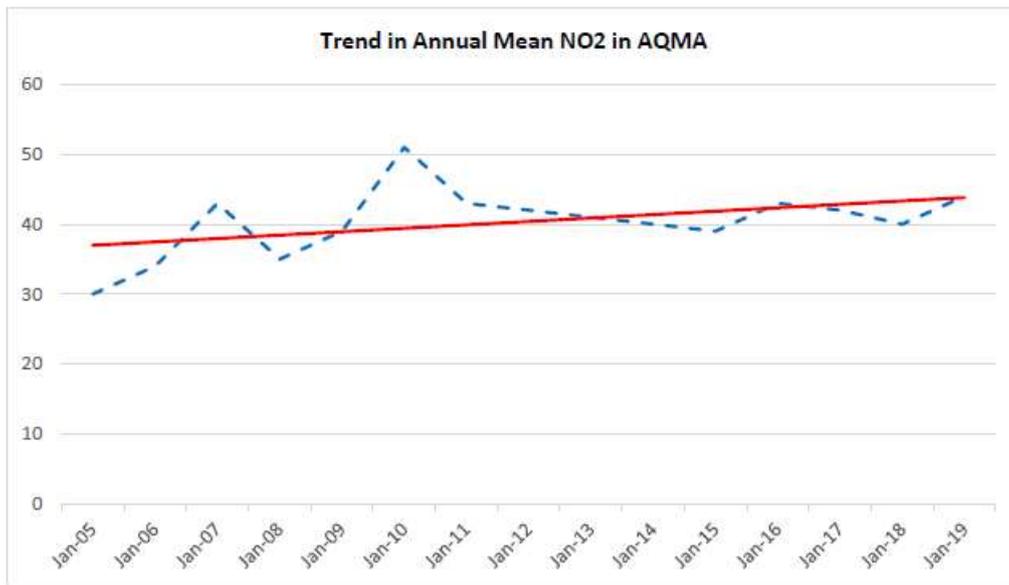
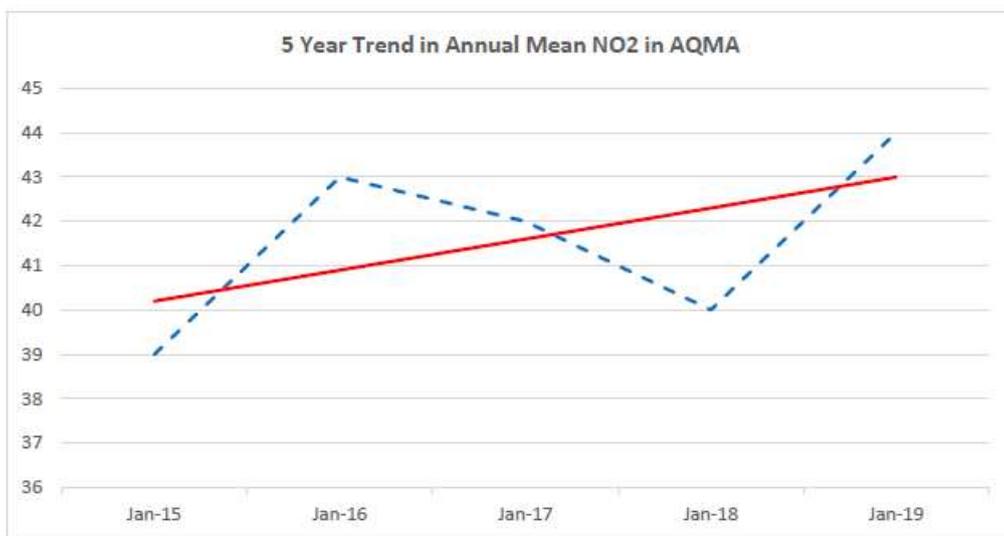


Fig 3.6a



Crawley Borough Local Plan 2020 – 2035
January 2020
Air Quality

16.41 Crawley is generally a clean urban borough, and is fortunate in having no seriously polluted areas. Air Quality in the borough is mainly good, with national targets being met for all pollutants with the exception of nitrogen dioxide (NO2) at a small number of locations including the designated Hazelwick Air Quality Management Area (AQMA) along the A2011 at Crawley Avenue and surrounding areas¹³⁹. A key contributor to poor air quality in these areas is emissions from all types of vehicles along busy roads and commuter routes.

As previously stated the addition of significant vehicle movements is going to contribute to the already growing problem.

16.42 In addition to traffic, air quality can be affected by a number of pollutant sources, including industrial, commercial and domestic.

New development can contribute to local emissions and have an impact on local air quality. Therefore, it is important that opportunities are taken to improve local air quality conditions, and as a minimum, mitigate the impacts of the development through good design and sustainable building measures that promote good air quality. It is important to ensure that development that is intended to reduce greenhouse gas emissions and fuel consumption **is not unintentionally detrimental to local air quality.**

Development in or close to an AQMA should prioritise generation of heat and power through means that do not influence air quality and minimise emissions to air from combustion.

16.43 **Therefore, it is vital that the maintaining and where possible improvement of air quality is appropriately factored into the location, design and operation of development. The overarching objective is to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by air pollution.** To help achieve this, the Local Plan draws upon national and local guidance, including any subsequent Air Quality Supplementary Planning Document (SPD).

The section in red is self explanatory and questions why you would build within or close to and area with poor air quality.

Strategic Policy EP5: Air Quality

People's health, quality of life and wider environment shall be protected from the significant adverse effects of atmospheric pollution.

Development should help to improve air quality and enhance the environment. New and existing development will be prevented from contributing to, being put at risk from, or being adversely affected by atmospheric pollution.

To achieve this, development will be required to prevent, or where this is not practicable, minimise the generation of pollutants that would result in a deterioration in air quality and to prevent exposure to poor air quality.

To ensure that air quality is appropriately taken into account in the planning of development, applicants will adhere to national and local guidance, including the Local Plan Planning Obligations Annex and Air Quality and Emissions Mitigation Guidance for Sussex (2019 or latest version) which should be used to identify if:

a) an Emissions Mitigation Statement is required as part of a planning application;

b) an Air Quality Impact Assessment is required as part of a planning application.

To reduce the overall background levels of pollution, sustainable design principles shall be incorporated into the development to ensure that the residual local emissions of air pollution are prevented or, where this is not practicable, minimised. This shall include the high standards of insulation, the selection of low emission technology for heating and power; and the provision of facilities for sustainable transport including electric vehicle charge infrastructure and charge points.

Planning permission will only be granted where it:

i. can be demonstrated that air quality has been appropriately factored into the location, design and operation of development, and where necessary, appropriate mitigation provided; and

ii. **will not result in a deterioration of air quality within an AQMA; and**

iii. **will not lead to the declaration of a new AQMA; and**

iv. **does not conflict with the requirements of an air quality action plan; and**

v. **will not result in an increase exposure within an AQMA.**

Development of Industrial and Commercial Use

Development that includes industrial and commercial land uses must submit appropriate detailed evidence to enable assessment of potential significant adverse air quality impacts.

Mitigation measures should be included in proposals where evidence suggests a likely significant adverse effect.

The proposed application contravenes at least 4 of the statements that would mean planning permission will not be granted as shown in red.

5.0 Trees and Wild Meadow

The tree impact document shows the potential loss of 17 trees and a further 19 at risk.

I have personally surveyed the areas in question and have counted over 250 trees of varying diameters that would need to be removed in order to relocate Oakwood Football and provide adequate parking. A further 50 will probably need to be removed to accommodate the housing in the Southern and Central areas.

I cannot understand how your survey has only picked up 36 trees in total, below are photos of the areas where the football pitches and car park are going to be located alongside the residential area.



Strategic Policy DD5: Tree Replacement Standards

Tree retention and provision needs to be accounted for at an early stage when designing the layout of new development. Following the completion of surveys and analysis of the site, consideration must be given to which trees are the most suitable for retention:

i. Trees of the highest quality (those categorised as A and B trees in the Tree Survey) should be retained as part of the proposed layout.

ii. Trees of moderate and low value (category C and below) should not automatically be considered for removal, as they may play a useful role in site screening, or as an important habitat feature.

Where development proposals would result in the loss of trees, applicants must identify which trees are to be removed and replaced in order to mitigate for the visual impact resulting from the loss of the tree canopies. Proposals must demonstrate that the number of replacements accords with the following requirements:

Trunk diameter of each tree (measured in cms at 1.5m above ground level) to be removed: No. of replacement trees required:

Less than 19.9	1
20 – 29.9	2
30 – 39.9	3
40 – 49.9	4
50 – 59.9	5
60 – 69.9	6
70 – 79.9	7
80+	8

The girth of replacement trees will vary depending on species and location but should balance the need to reduce the likelihood of new tree stock failing to survive whilst providing visual amenity from the outset.

The replacement tree planting requirements would normally be expected to be met within the development site. Where the local planning authority agrees that this is not feasible or desirable, commuted sums will be sought in lieu on a per tree basis, taking account of constraints to planting. The approach would enable the green character and appearance of the borough to be maintained through tree planting on appropriate and available land.

The Manor Royal Design Guide SPD sets out tree planting requirements for sites in Manor Royal.

In addition to the loss of trees the wild meadow located in the northern section will also be lost along with plants insects and wildlife in direct conflict with the Environment Bill 2020, extracts shown below.

Environment Bill 2020

Habitats restored, created and brought into management for biodiversity on land and in freshwaters

We want to increase the amount of good-quality habitat for wildlife in England. Many of our wetlands, woodlands, grasslands and coastal habitats have been lost. While losses have slowed, many natural and semi-natural habitats are in poor condition and getting worse due to past land use and ongoing pressures such as grazing, burning, and poor water and air quality. Patches of habitat are also often very fragmented, isolated and too small to sustain thriving communities of species into the future. The historical data we have on species abundance and distribution consistently link species loss with habitat loss or degradation. Where habitat is restored, species respond, and the flow of wider ecosystem services increases.

In the 25 Year Environment Plan we committed to create or restore 500,000 hectares of wildlife-rich habitat outside of protected sites, as part of a Nature Recovery Network, to complement and connect our best wildlife sites. We said that recovering biodiversity will require more habitat, in better condition, in bigger patches that are more closely connected, in line with Lawton principles [footnote 8]. As noted above, the Environment Bill lays the foundation for the Nature Recovery Network that will complement plans for a new Environmental Land Management scheme. However, improving woodland cover, there is more to do to restore and create habitats, outside protected sites, to help meet our 25 Year Environment Plan commitment.

Trees and woodland are critical to supporting our national commitment to reach net zero emissions by 2050, as one of the most cost-effective nature based solutions to climate change. Trees and woodlands also have a critical role to play in recovering nature and promoting biodiversity, supporting our long-term vision set out in the 25 Year Environment Plan.

Government is therefore committed to expanding and managing our woodlands to deliver the multiple environmental, social and economic benefits trees can offer, including a manifesto commitment to increase tree planting across the UK to 30,000 hectares of trees per year by 2025.

Rather than cutting down and removing the trees we should be looking to maintain and add to them rather than building more houses and generating more pollution.

6.0 Birch Lea Access

6.1 Vehicle Movements

The original plan stated peak vehicle movements of 83 am and 84 pm, this has reduced to 76 am and 77 pm a small negligible reduction circa 9%, not the 10% stated in the Design Statement.

In reality these numbers do not align with the national averages and averages for the South East as defined by government statistics.

According to the plan, there is parking allocation for 232 vehicles.

The average movement per day according to government statistics are 1.1 per vehicle

On this basis I would expect movements to be nearer the 255 per day and not as described in the plan only 153 at peak times.

The remote location of the proposed development with limited immediate access to facilities will require people to utilise their cars.

Taking the average number of vehicles per household for the South East as published by government 1.41 and the average movements this reduces the daily movement to **215 per day**.

To get the full picture the additional journeys by parcel delivery drivers, food delivery drivers, refuse collection, taxi's, maintenance and trades people, visitors, care workers and council staff to maintain the open spaces all should be added to the count.

For Example:

Parcel Deliveries.

The average number of parcel deliveries per person per year in the UK is 57.

For this development based on the national average of 2.39 people per household, this equates to $138 \times 2.39 = 330$ People. $330 \times 57 = 18,799$ Deliveries. One in and one out equates to 37,598 vehicle movements through Birch Lea per year or **103 per day**.

This number is expected to double by 2026 to **206 per day**.

Takeaway Deliveries

The average number of takeaway deliveries per person is 34 per annum. $138 \times 34 = 4692$. One journey in and one out equates to 9384 vehicle movements through Birch Lea or **26 per day**.

Total Movements per day $215+103+26 = 343$, average of one vehicle every 2.8 minutes for 16 hrs a day, increasing to at least 446 by 2026 or an average of one vehicle every 2.2 minutes . This excludes groceries, trades people, taxi's etc.

Clearly a major issue for a small cul de sac never designed for this level of traffic and in particular a significant number of larger delivery vehicles.

6.2 Footpath and Pedestrian Safety

The revised plan has increased the risk to pedestrians and cyclists and created more safety issues than the previous plan and has ignored Government advice with regards pedestrians. Even more serious considering the estimated number of vehicle movements up and down Birch Lea.

See below extracts from the Department of Transport '*Inclusive Mobility*' and '*Manual for the Streets*' and I'DGO Inclusive Design for Getting Outdoors (I'DGO) '*The Design of Streets With Older People In Mind*'.

I have highlighted the pertinent sections to draw your attention to the issues.

Manual for the Streets Ministry of Transport

"2.7 Disability discrimination

2.7.1 Highway and planning authorities must comply with the Disability Equality Duty under the Disability Discrimination Act 2005.¹⁶ This means that in their decisions and actions, authorities are required to have due regard to the six principles of:

- promote equality of opportunity between disabled persons and other persons;
- eliminate discrimination that is unlawful under the 2005 Act;
- **eliminate harassment of disabled persons that is related to their disabilities;**
- **promote positive attitudes towards disabled persons;**
- **encourage participation by disabled persons in public life;** and

- take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons.

2.7.2 Those who fail to observe these requirements will be at the risk of a claim. Not only is there an expectation of positive action, but the duty is retrospective and local authorities will be expected to take reasonable action to rectify occurrences of non-compliance in existing areas.

2.7.3 The Disability Rights Commission (DRC) have published a Statutory Code of Practice on the Disability Equality Duty and they have also published specific guidance for those dealing with planning, buildings and the street environment.

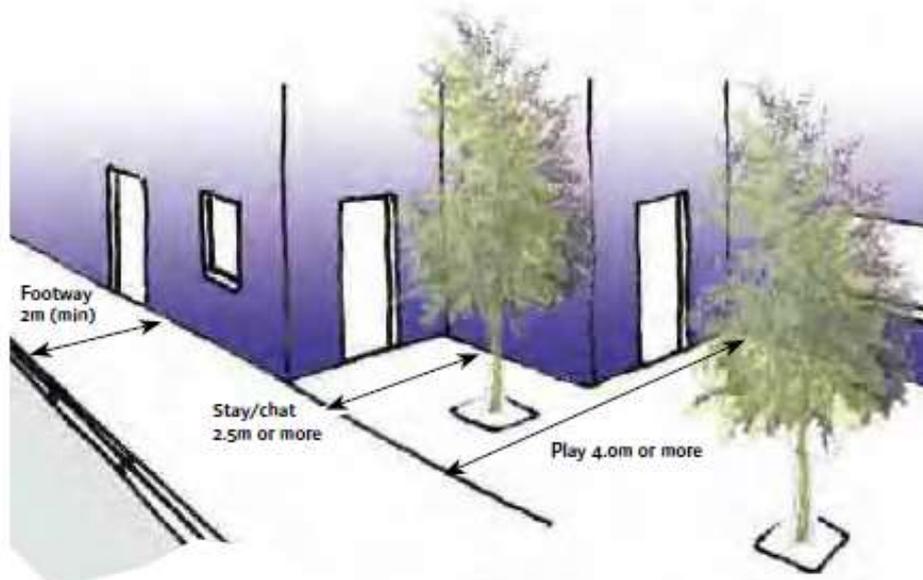
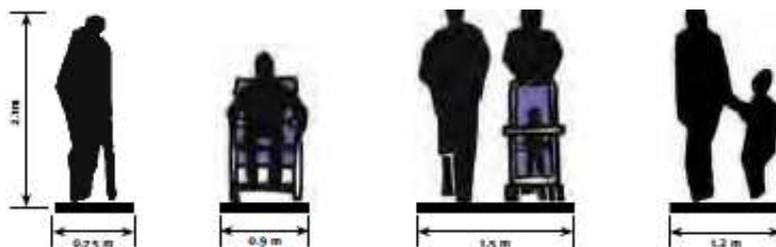


Figure 6.8 The footway and pedestrian areas provide for a range of functions which can include browsing, pausing, socialising and play.

6.3.20 Inclusive Mobility gives guidance on design measures for use where there are steep slopes or drops at the rear of footways.

6.3.21 Places for pedestrians may need to serve a variety of purposes, including movement in groups, children's play and other activities (Fig. 6.8).

6.3.22 There is no maximum width for footways. In lightly used streets (such as those with a purely residential function), **the minimum unobstructed width for pedestrians should generally be 2 m.** Additional width should be considered between the footway and a heavily used carriageway, or adjacent to gathering places, such as schools and shops. Further guidance on minimum footway widths is given in Inclusive Mobility.

6.8.13 The design of new developments should **not require waste bins to be left on the footway as they reduce its effective width.** **Waste bins on the footway pose a hazard for blind or partially sighted people and may prevent wheelchair and pushchair users from getting past.**

Inclusive Mobility - Department of Transport

2 Basic human factors information

2.1 Definitions

It is essential that design for people with mobility impairments should be to the highest possible standards. This requires knowledge of the capabilities of different types of person. This section provides information on the basic human requirements for ease of movement. In designing or modifying facilities the aim should be to be generous in the allocation of space.

The term disability is a broad one. It includes people with physical, sensory or mental impairment; at a **conservative estimate between 12 and 13 per cent of the population** have some degree of impairment. Many, though not all, face barriers to movement in the environment. This guide is intended to show how these barriers can be removed or at least reduced, but it does have a wider relevance because there are many other people not conventionally considered to have a disability who also encounter barriers to movement.

People with small children, people carrying heavy shopping or luggage, people with **temporary accident injuries and older people can all benefit from good design of the pedestrian and transport environment.** Without a barrier free environment, many of these people will be mobility impaired.

While it is true that there are many aspects of design in the pedestrian environment that are helpful to all or most disabled people (and many others as well) there are also some specific facilities needed by people with a particular kind of impairment.

Manual wheelchair users need sufficient space to be able to propel the chair without banging their elbows or knuckles on door frames or other obstacles. But someone who walks with sticks or crutches also needs more space than a non-disabled walker; so too does a long cane user or person carrying luggage, or a lot of shopping bags, or with small children. Thus providing adequate clear space on pavements, along passages in public buildings, through doorways etc, is of benefit to many people.

The DDA defines a person as having, a disability if he has a physical or mental impairment which has a substantial and long term adverse effect on his ability to carry out normal day-to-day activities.

There are various ways or models used to define disability, but in functional terms this guide is mainly concerned with the following:

Locomotion, which includes people who use wheelchairs and those who can walk but only with difficulty often using some form of aid such as a stick or walking frame. Approaching 70% of disabled people have locomotion difficulties: those with walking difficulties outnumber wheelchair users by about 10:1.

Seeing, which can be sub-divided into blind and partially sighted people. It is estimated by the Department for Work and Pensions (DWP) that there are almost two million people in Great Britain with a significant sight loss.

Hearing, which can also be sub-divided into those who are profoundly deaf and those with impaired hearing, ranging from severe to mild deafness. The Royal National Institute for Deaf People (RNID) estimates that there are over eight million deaf or hard of hearing people in the UK of whom approaching 700,000 are severely or profoundly deaf.

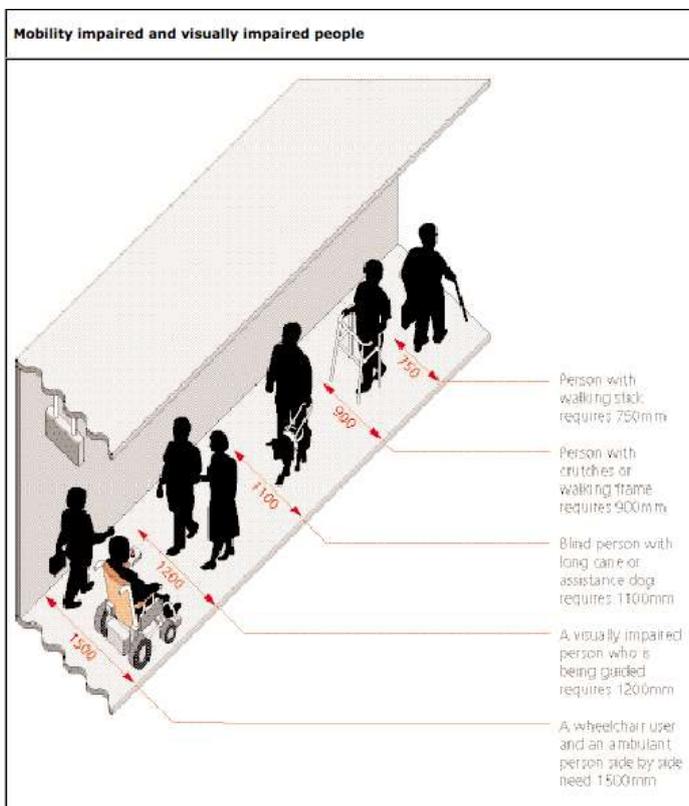
Reaching, stretching and dexterity, frequently the result of arthritis, which can make these movements painful and difficult, or of muscular dystrophy causing a loss of muscular strength, or of complaints of the nervous system.

Learning disability, making it hard to understand complicated information or to use complex machines (like some ticket machines). It should be remembered that these categories are not mutually exclusive.

Many disabled people, particularly older people, have more than one impairment. The following paragraphs give some basic information on the space needed by people when they are standing or moving. Of course there is a lot of variation in this, but if the dimensions given below are used then the great majority of disabled people will be able to move around buildings and the environment much more easily.

2.2 Mobility impaired and visually impaired people

Someone who does not use a walking aid can manage to walk along a passage way less than 700mm wide, but just using a walking stick requires greater width than this; a minimum of 750mm. A person who uses two sticks or crutches, or a walking frame needs a minimum of 900mm, a blind person using a long cane or with an assistance dog needs 1100mm. A visually impaired person who is being guided needs a width of 1200mm. A wheelchair user and an ambulant person side-by-side need 1500mm width.



2.3 Wheelchair users

3 Footways, footpaths and pedestrian areas

The distinction between a footway and a footpath is that a footway (usually called the pavement) is the part of a highway adjacent to, or contiguous with, the carriageway on which there is a public right of way on foot. A footpath has no contiguous carriageway. Where reference is made to one, it can generally be regarded as applying to the other for design purposes.

3.1 Widths

A clear width of 2000mm allows two wheelchairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. Where this is not possible because of physical constraints 1500mm could be regarded as the minimum acceptable under most circumstances, giving sufficient space for a wheelchair user and a walker to pass one another. The absolute minimum, where there is an obstacle, should be 1000mm clear space. The maximum length of restricted width should be 6 metres (see also Section 8.3). If there are local restrictions or obstacles causing this sort of reduction in width they should be grouped in a logical and regular pattern to assist visually impaired people.

Inclusive Design for Getting Outdoors has also conducted academic research and found the following results:

About I'DGO

Inclusive Design for Getting Outdoors is the brainchild of three academic research centres, working as a multi-disciplinary consortium, supported by a wide range of partners in industry, government and advocacy. The researchers are based in Edinburgh, Warwick and Salford, but engage in fieldwork throughout the UK and beyond.

THE DESIGN OF STREETS WITH OLDER PEOPLE IN MIND

Widths of footways and footpaths

This design guide provides information on the most suitable widths of footways taking account of numbers of pedestrians and their safety when using the footpath; the effective positioning of permanent features such as trees and bus shelters; and the preferences and needs of older people who use the footway with a variety of mobility aids such as walking sticks and scooters.

Context

Footways and footpaths should be designed so that they provide safety for pedestrians from traffic. The Department for Transport Manual for Streets (2007) confirms that there is no minimum width for footways. It suggests that in lightly used streets, the minimum unobstructed width for pedestrians should generally be 2000mm, and that in areas of higher pedestrian flow the quality of the walking experience can deteriorate unless sufficient width is provided. Inclusive Mobility (2002) advises that ideally the width of the footway should be 2000mm to facilitate two people in wheelchairs to pass each other comfortably.

What older people tell us they prefer and why

Very few participants (16%) feel comfortable with using narrow footways. Typical reasons for this are:

"You have to go on the roadway to get passed people on narrow pavements"
"You can't stop and talk to anyone because people can't get by, especially those with buggies"
"I have to take it steady and hope that people are polite enough to walk around me"

Participants find temporary obstacles to be both a nuisance and hazard:

"Parking on pavements is a problem. Sometimes you have to walk on the road to pass parked cars"
"I have to drive my mobility scooter on the road because pavements are blocked by parked cars. Riding a scooter on the road is unsafe"
"...it can be a marathon for frail people and those with walking sticks to get around them [temporary building works]"
"Many people park their cars on the pavement, they even drive on the pavement"

Most participants (79%) much prefer wider uncluttered footways. Typical reasons for this are:

"I feel safer from cars on wider pavements"
"I'm less likely to bang into people or things with my walker on wider pavements"
"I need room for my scooter and so that other people can get past me safely"

Recommendations

Whilst most footways were originally designed to provide minimum requirements, the subsequent poor positioning of permanent features has meant a significant reduction in the effective width of the footway. It is recommended that:

- Footways in new developments are designed to minimum width standards of 2000mm to include the diverse needs of users;
- Clear design information is provided on the positioning of permanent obstacles such that minimum widths of footways are maintained;

- Personal safety of pedestrians is prioritized such that temporary obstacles on footways are discouraged;
- The parking of cars on pavements should be discouraged.

The Extracts above demonstrate that the design for Birch Lea does not meet the minimum standards recommended by the Department of Transport's *Manual for the Streets and Inclusive Mobility documents* and do not follow the recommendations from the Inclusive Design for Getting Outdoors.

In the latest plan for Birch Lea one of the footpaths has been removed, leaving a single footpath of 1.8m. The previous plan included dual footpaths one ranging from 2.6m to 2.1m with a pinch point below the minimum standard of 1.6m. This footpath has been removed and the plan now relies on a single footpath of 1.8m which is the absolute minimum standard, but not the recommended. This does not allow for a mix of wheelchair users, mobility scooter users, pedestrians with shopping, pedestrians with prams, pedestrians with dogs on a lead, pedestrians with walking aids to pass safely on a single footpath, forcing pedestrians into the road.

The added risk in Birch Lee is the necessity to cross multiple driveways where cars could be reversing or entering a property and the poor visibility around a blind bend.

The Government's Inclusive Mobility advice states a clear width of 2000mm allows two wheelchairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. The proposed 1800mm is below the minimum and would not allow for Wheelchair/ mobility scooter users to pass pedestrians with walking sticks or other mobility aids safely.

With a significant increase in dog ownership during COVID in the lane, the only access to open space will be via Birch Lea and a narrow pavement, creating problems for the dog owners and pedestrians passing each other, forcing them into the road, significantly more difficult for parents with buggies, wheelchair and mobility scooter users. The only other access point via Kenmara Court doesn't show any pedestrian access or associated footpaths and therefore cannot be considered as a safe access point for pedestrians to Tinsley Lane.

Weekly, on bin collection day, the footpath can be further narrowed unintentionally by bins being left out for collection and not returned to driveways after emptying. The photos below show a recent example on a quiet day showing at

least 7 bins in this short piece of footpath, this would be further increased when the recycling bins are collected every other week.



The revised proposal contravenes your own planning guidelines in two key areas:

Provides a **safe** and **secure** environment for its **residents** and **visitors**;

Create public spaces and routes that are attractive, **safe**, uncluttered and which work effectively for all in society, including **disabled** and **elderly people**;

6.3 Residents Quality of Life and Disturbance

This development will have a significant impact on residents of Birch Lea whose life choices have been to locate to a quiet cul de sac with no passing traffic, if approved this development would create a completely unacceptable increase in the level of traffic, associated noise and reduction in air quality. The narrow pavements will increase the risk to pedestrians and reduce their levels of safety.

Those residents backing onto the development will have a rural outlook replaced by houses and an enclosed compound style barrier of 3 storey apartment blocks instead of natural fields and trees. The same residents will be overlooked and lose their privacy.

For the duration of any build, probably 2-3 years residents will suffer from noise, dust and significant disturbance.

7.0 General Issues

Parking at Oakwood Football Club has significantly increased and caused problems for residents and Users alike, see photos below, this situation has occurred on multiple occasions during recent months. Those attending the football club were unable to park and couldn't find spaces. The parking proposed for the new facility will not be adequate based on the recent experiences of local residents and will lead to overspill into the surrounding area. One of the concerns raised during the last application.



The Tinsley Lane Development Brief states that (page 29): *The development site at Tinsley Lane is located in an area where parking provision is in limited supply. Demand for parking within Manor Royal Business District has a knock-on effect on surrounding residential streets where there is significant pressure for parking spaces, often causing problems for local residents.*

The proposed Manor Royal Parking Management Plan will drive more parking to Tinsley lane through increased restriction proposed in Manor Royal

Economic Viability

Below is an extract from the Planning Statement covering the 2018 Planning Application. The statement indicates that anything less than 150 units could call into question the viability of the development scheme. Does 138 units make the scheme not economically viable?

Homes England's argument that the number of 150 homes is needed for viability and to buy out existing leaseholders supports the view that less than 150 ie 138 is not economically viable. If this is the case, 150 was rejected and 138 is not economically viable the planning application should not even been submitted as it untenable.

4.1 The Development Plan

Crawley Borough Local Plan (2015 – 2030)

The **delivery of up to 150 units enables a viable development scheme** whilst also ensuring delivery of the required housing mix and parking standards can be achieved.

Unused buildings and accomodation government plan

The plan submitted is only illustrative I am therefore unable to comment directly on that plan other than to say that access to the open spaces has been afforded to the residents for over 22 years and I would expect this access to continue in any future plans. There are many areas that are subject to detailed planning which are not addressed at this stage that need to be, in order to make the correct planning decision

Crawley Council will have assets transferred, at what cost to the council tax payer and the on-going maintenance running costs? Will the council be able to afford the maintenance after the economic impact of COVID, they struggle to maintain the existing area as shown by the photo earlier.

I have to question the timing of the plan re submission, a plan that has already been rejected, with the Country recovering from a pandemic, in the middle of a cost of living crisis, many people struggling with their mental health and financial difficulties, why add to their burden by brining this Planning Application up once again at the worst possible time

People are stressed enough without the Council bringing this back to the table I find the whole thing distasteful, insensitive and thoughtless on those who pay for your

services. Anyone in the local area needing to down size due to financial difficulties will find selling their house impossible whilst you continue to force this Planning Application through, in an area that is clearly not suited to this development.

I suggest the proposal contravenes your own planning guidelines and Government advice in numerous areas and therefore the Planning Application should be rejected.

In the revised proposal I'm not able to see what significant improvements have been made that would address the issues raised by the Counsellors and enable them to change their mind and accept any plan in relation to the access through Birch Lea and housing density. If anything, the revised proposal has made the Birch Lea access point even less desirable on safety grounds.

1. The proposed density of the development is out of character with the existing local housing in the area and the Local Planning Authority is not satisfied that the level of housing proposed would result in a good standard of residential amenity for future residents, contrary to policies CH3 and CH5 of the Crawley Borough Local Plan and the Urban Design Supplementary Planning Document.

The revised density is not materially different from the planning application that was rejected and therefore should also be rejected.

2. The Local Planning Authority considers that the proposed intensification in use of Birch Lea to serve up to an additional 150 dwellings would cause unacceptable harm to the residential amenity enjoyed by existing residents of the cul-de-sac contrary to policy CH3 of the Crawley Borough Local Plan.

The rejection statements still holds true for the residence of Birch Lea, the changes to the planning application still do not address the unacceptable harm to the residential amenity.

As a reminder, courtesy of the Crawley Observer, I have summarised the outcome of the last Planning Application meeting below:

One of the main sticking points was the plan to use the narrow, ten-home cul-de-sac of Birch Lea as one of two access roads, the other being via Kenmara Court.

Ian Irvine (Lab, Broadfield) said using Birch Lea would affect the quality of life of those residents and called on Homes England to come up with a better idea.

Liam Ascough (Con, Gossops Green & North East Broadfield) agreed. He said: "I do agree we obviously need more housing in Crawley – however I disagree when it's a detriment to existing residents.

