# Crawley Borough Local Plan Examination INSPECTOR'S PRELIMINARY FINDINGS - 1

At the final hearing session on 18 May I stated that I would provide the Council with my preliminary findings on those matters where, following consideration of the evidence, I will be recommending that a potentially significant main modification is made to the Crawley Borough Local Plan (CBLP). This early indication of my findings is necessary to fit in with the Council's programme of reporting to Members so that public consultation on main modifications can take place with minimum delay.

In general terms, subject to the main modifications suggested by the Council before and during the examination hearings, the CBLP is likely to be found sound. I consider that three amendments are necessary to the housing sites under policy H2, as set out below. The Council may wish to make a consequential adjustment to the housing delivery and unmet need numbers in the plan, though to avoid giving the impression of spurious precision it may be desirable to 'round' these figures (perhaps to the nearest 100). I have also indicated briefly my approach to the assessment of housing need, which differs slightly from that of the Council. My detailed reasoning for all these conclusions will be explained in due course in my report to the Council.

I have not yet completed my consideration of the main modifications proposed by the Council during the hearings. I will write separately to the Council with any further suggested revisions to the wording of the plan before the public consultation on main modifications takes place, though I am not anticipating that any substantial changes will be necessary.

### Key housing sites - policy H2

# Tinsley Lane

The NPPF 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. Provided the proposed artificial pitch is large enough for youths and training (Sport England advises 79m x 52m), and wider club/community use can be secured, I consider that the replacement open space provision would satisfy national policy. I am also satisfied that an acceptable residential noise environment can be achieved, and that other concerns can be satisfactorily addressed.

However, it is not clear whether the retained northern playing field has the capacity to accommodate the relocated Oakwood Football Club pitch, a suitably large artificial pitch, a pavilion and a car park. This is because the plan submitted during the hearings shows a smaller artificial pitch than is likely to be required, and there is little space for enlargement. In these circumstances it is prudent to allow for the possibility that some of

these facilities (most likely the car park) might have to be sited on the northern part of the adjacent housing site, with a consequent reduction in the number of dwellings. I believe a modest reduction in site capacity to 120 dwellings is a more robust figure at this stage, though the potential for 138 dwellings remains if at detailed design stage the northern field is found to have the capacity to deliver the full range of playing pitch facilities.

### Oakhurst Grange

The evidence for retaining the site specifically as a nursing home is not compelling. Nevertheless, having regard to the loss of elderly care provision and the good accessibility of the location, if the Council wishes I would support some or all of the dwellings on this site being designed and built to meet the needs of older people, as promoted in the revised PPG. This might be by requiring Building Regulations Part M, category 3 wheelchair adaptable dwellings, or by some other means. If, however, the Council does not believe that provision for older people is appropriate, the site should be allocated for general housing with no specific requirements. In any event, to ensure that the existing care home is not perceived as inappropriate on this site, the allocation in policy H2 should specifically refer to housing or class C2 residential home use.

#### Land east of Street Hill

The combined effects of physical separation, topography and woodland vegetation lead me to conclude that limited housing development on the site would not cause harm to the appreciation of the historic significance of the Grade I listed church of St Nicholas or to the heritage values which define its setting. There would also be no significant harm to the locally designated historic parkland or moat, subject to a suitable unbuilt margin around the latter. Housing development would cause limited harm to the character of Worth Conservation Area, though that harm could be minimised by a scale and design of development which respects the rural nature of the Conservation Area. This is likely to necessitate a loose-knit, low density layout which is clearly different to the suburban character of nearby Maidenbower. Given the limited land available, about 15 dwellings is likely to represent an appropriate balance between respect for heritage assets and the need for dwellings.

The most important attribute of the SNCI, the species-rich meadow grassland, has diminished appreciably since designation as a result of encroaching bramble scrub. Without intervention all the meadow grassland habitat will in time be replaced by bramble and, ultimately, woodland. Proper management of the two-thirds of the SNCI not affected by development would enable the decline of the remaining species-rich meadow habitat to be arrested. Mitigation of this nature, secured as part of the development, would offset the harm caused by the loss of part of the meadow and (as with the heritage assets) represents a balanced approach to meeting the housing needs of the area.

Thus in principle the land east of Street Hill is suitable for about 15 dwellings. Whether this merits a specific allocation under policy H2, and how to treat the adjustment to the urban area boundary, is for the Council to decide.

## Objectively assessed housing need

I agree that the figure of 10,125 dwellings over the 2015-2030 plan period, or 675 per annum, represents the full objectively assessed need for the borough. However, I base this on a different reasoning to that propounded by the Council. I am not convinced that the market signals uplift is justified by the evidence, for the various indicators reveal a situation in Crawley which is not as severe as in other North West Sussex authorities, and one that has not worsened in recent years.

On the other hand, I believe it is necessary to plan for the level of housing need derived from the DCLG 2012-based household forecasts, these being the most recent and robust projections available. DCLG predicts the number of households at 2030 to be 54,060 compared to 43,500 at 2012. I consider that 10,125 dwellings over the 2015-30 plan period would be necessary if the DCLG projection at 2030 is to be met in full.

Martín Píke

Inspector 26 May 2015