

**CRAWLEY BOROUGH LOCAL PLAN 2024 - 2040**

**EXAMINATION STATEMENT  
ON BEHALF OF THE BUCKNALL FAMILY**

**POLICY H2: KEY HOUSING SITES**

**Housing, Biodiversity and Heritage Site - Land East of  
Balcombe Road/Street Hill, Pound Hill, Crawley**

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### **Response to Examination Question 6.4:**

***Is the inclusion of Land East of Balcombe Road/Street Hill, Pound Hill justified and consistent with national policy and PPG paragraph 013- 20190721 in allocating land which contains a Local Wildlife Site as part of ecological networks? Does the policy provide sufficient protection and scope for enhancement of the Local Wildlife Site, including connectivity to wider ecological networks?***

Tony Fullwood Associates act on behalf of the Bucknall family – owners of the Housing, Biodiversity and Heritage Site allocated within Policy H2 (Key Housing Sites) in the Crawley Borough Local Plan 2024 – 2040. It is common ground with the Borough Council that the site remains suitable, available and achievable.

### **Consistency with national policy and PPG**

The principle of allocating this Housing, Biodiversity and Heritage Site within a Local Wildlife Site (previously a Site of Nature Conservation Interest) was accepted as being consistent with national policy by the Inspector at the Examination into the now adopted Crawley Borough Local Plan.

There are no material changes in national planning policy since the Inspector's Report was issued (November 2015) which either diminish the need to meet identified housing need in the Borough wherever possible or which further constrain development.

The NPPF states:

*'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures...'*  
(Para.174)

Plans should continue to distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value...and maintain and enhance networks of habitats (Para. 175).

In order to protect and enhance biodiversity and geodiversity, plans should:

*'a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*

*b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'*  
(Para.179)

National Planning Practice Guidance (Paragraph: 013 Reference ID: 8-013-20190721) states that plans should identify and map Local Wildlife Sites and include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.

In the case of Land east of Balcombe Road/Street Hill, Policy H2 alongside Policy GI2 seeks to minimise impacts on, and provide enhancements and net gains for, biodiversity in accordance with national policies.

Worth Meadows Site of Nature Conservation Importance (SNCI) was designated in 1992 for its mix of relatively species-rich meadows, two overgrown ponds, some woodland and a stream. SNCIs have subsequently been renamed Local Wildlife Sites but continue to represent the lowest in the hierarchy of habitat designations.

The impact of the Indicative Key Housing Site can be assessed in relation to each of these habitats by reference to the Extended Phase 1 Habitat Survey conducted prior to the last Local Plan Inquiry. For ease of reference, this Survey is re-submitted with this statement. In summary, the Extended Phase 1 Habitat Survey states:

#### *Ponds*

The Indicative Key Housing Site shown on the Policies Map excludes the pond habitats, which are themselves now degraded (Para. 4.4.1).

#### *Woodland*

The Indicative Key Housing Site lies outside the principal woodland habitats to the north, the coppiced woodland adjoining the motorway to the east and the western section of the younger broad-leaved woodland on the southern site boundary. Development would also be excluded from the eastern section of woodland on this southern boundary in order to be located away from Gatwick Stream and the small area of Flood Zone 3.

An area of open woodland dominated by hazel coppice extends along the western LWS site boundary and would be retained as part of the green infrastructure framework with the exception of a narrow strip required to provide access to the site. Detailed Phase 2 habitat surveys would be conducted of this area prior to the precise design and location of the access.

#### *Stream*

The stream and the area of Flood Zone 3 which border it are excluded from the Indicative Key Housing Site.

### *Species-rich meadows*

The Extended Phase 1 Habitat Survey noted that although in its current state the grassland habitat reflects the former meadow it once was, it is now less diverse and is becoming dominated by species typical of rank semi-improved grassland (Para. 5.2.3). Importantly the Survey noted that, due to the encroachment of bramble, only a small percentage of this habitat type now remains (Para. 7.2).

The Extended Phase 1 Habitat Survey concludes that the principal contributor to the original designation of the SNCI in 1992 has been significantly depleted in the last three decades and is likely to disappear in the near future.

The Inspector examining the now adopted Crawley Borough Local Plan concluded:

*'The woodlands and ponds would not be affected by the proposed houses. There is little doubt that, without intervention (which seems unlikely) all the meadow grassland habitat for which the SNCI was primarily designated will in time be replaced by bramble scrub and, ultimately, woodland. Consequently there is considerable force to the argument that 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, thereby mitigating the harm caused by the loss of part of the meadow. This would be secured as part of the development by a comprehensive and binding management plan which would also ensure the necessary protection and/or mitigation for any protected species found on the site. (Para 54).'*

Since the Survey and Inspector's report in 2015, there has been further encroachment onto the areas of semi-natural grassland by surrounding bramble and now only small pockets remain within the Indicative Key Housing Site area as shown on the photographs below (May 2023).



Natural predation is resulting in harm to, and loss of, the principal habitat for which the LWS was designated. Policy H2 Land east of Balcombe Road/Street Hill, Pound Hill is specifically designed to secure protection from further harm or loss of species-rich grassland in accordance with the NPPF and NPPG.

Importantly, the NPPF (Para. 179) states that, as well as safeguarding components of local wildlife rich habitats, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. Policy H2 Land east of Balcombe Road/Street Hill is specifically designed to secure a long-term commitment to the ecological enhancement and positive management of the remainder of the LWS for the benefit of biodiversity in accordance with national planning policy.

### **Is Policy H2 Land east of Balcombe Road/Street Hill, Pound Hill justified?**

It should be emphasised that Land east of Balcombe Road/Street Hill is allocated as a Housing, Biodiversity and Heritage Site, rather than simply a housing allocation.

In accordance with the NPPF, the Local Plan should significantly boost the provision of housing and attempt to meet local housing need within the Plan area. Without the Indicative Key Housing Site, the Local Plan would fall further behind in meeting local housing need. The Inspector examining the now adopted Crawley Borough Local Plan concluded that the site secures *'the public benefit of a small but nonetheless significant contribution towards meeting Crawley's housing need on a site within Crawley'*.

As stated, this allocation also achieves the considerable benefit of securing a long-term commitment to the ecological enhancement and positive management of the LWS and, in association with Policy GI3 and the Environment Act, brings forward biodiversity net gains.

The allocation also enables a medieval moat to be revealed and enhanced in accordance with the NPPF which states:

*'Local planning authorities should look for opportunities for new development within Conservation Areas ... and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'* (Para. 206)

The allocated Land east of Balcombe Road/Street Hill is suitable, available and achievable (indeed further survey work is underway in anticipation of a planning application and constructive dialogue with officers is being sought) and the site represents a deliverable site.

For these reasons, the inclusion of the Housing, Biodiversity and Heritage Site allocation represents an entirely appropriate planning strategy for the site itself and in helping to achieve the wider objectives of the Local Plan and is therefore justified under this test of soundness as expressed in the NPPF.