



## Introduction

Homes England (HE) supports the retention of Land East of Tinsley Lane as an allocation in the Crawley Local Plan and welcomes the opportunity to respond to the Inspectors MIQs.

By way of introduction, and to bring the Inspector up to speed, key milestones which have progressed since the adoption of the current Local Plan in 2015 and the previous allocation of Tinsley Lane are as follows:

- 2017 Tinsley Lane Development Brief SPD prepared jointly with Crawley Borough Council policy team
- 2018 outline application submitted for 'up to' 150 homes + sports and open space
- Sept 2020 outline application refused at committee on amenity and density grounds, against Officer's advice
- May 2021 revised application submitted for 'up to' 138 homes + sports and open space. Officer recommendation to approve for 2<sup>nd</sup> time.
- Water Neutrality moratorium
- Local Plan Examination / MIQ Response December 23.

### Current Planning Position

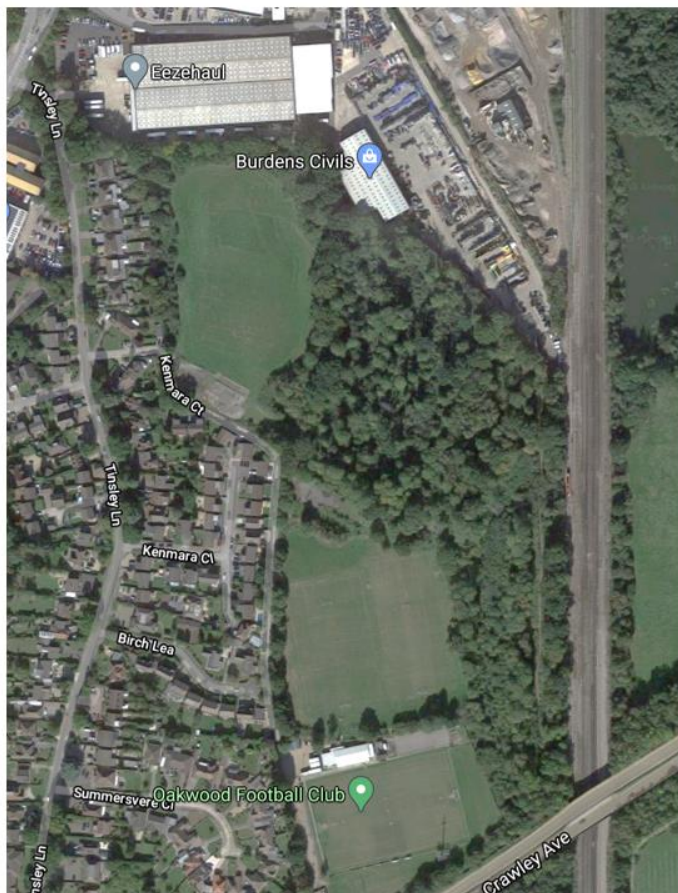
A revised outline planning application was submitted in 2021 (reference: CR/2021/0355/OUT) for:

*Development of up to 138 new market and affordable homes (Use Class C3); demolition of the existing Oakwood Football Club facilities and provision of a new clubhouse, senior all-weather and junior grass football pitch; provision of new public open space and woodland access; new site access from Birch Lea and improvements to the existing site access from Kenmara Court; and other ancillary works.*

This application demonstrates that 138 homes can comfortably be accommodated on the site and reflects the previous Local Plan Inspector's view that 138 homes can be accommodated on the central and southern land parcels on the proviso the football facilities can be provided on the northern land parcel, which is achievable.

The application was due to go to Committee in September 2021 with a recommendation for approval when Natural England paused the determination of all applications in the Borough until a strategic water neutrality solution was put forward. HE has a water neutrality solution underway and will seek resolution of the application in 2024.





*Current site arrangement showing northern, central and southern parcels. Indicative masterplan showing 138 homes, open space and re-provided/ enhanced football facilities*

**6.5 Is the proposed allocation of the Tinsley Lane site soundly based, having regard, to amongst other things, the overall provision of sports facilities / pitches to meet the needs of the Borough’s population; the vitality and viability of existing sports clubs at the Tinsley Lane site; highway safety and access to the site; amenities of nearby residential properties; and local biodiversity?**

HE believes the proposed allocation at Tinsley Lane as a ‘Housing and Open Space Site’ in Policy H2 ‘Key Housing Sites’ of the Crawley Borough Submission Local Plan, May 2023 is soundly based in relation to matters of open space need and provision, the vitality and viability of existing sports clubs at the Tinsley Lane site, highway safety, the amenity of nearby properties, and biodiversity.

Overall provision of sports facilities/ pitches to meet the needs of the Borough population

Firstly, it is worth noting that the Inspector examining the adopted allocation policy for the site confirmed that the allocation would satisfy the then National Planning Policy Framework (NPPF) 2012, 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. The area of existing playing pitches on site remains the same as the situation in 2015 but the quality of re-provision proposed has been enhanced further as explained below.

Crawley Borough Council (CBC) have prepared a Playing Pitch Strategy (PPS) as evidence for the new Local Plan and this provides a robust and updated position on which the retained allocation has been proposed. CBC have confirmed that there has been no loss of playing pitches since the PPS’ publication and therefore the PPS still



represents accurate and relevant evidence. The PPS summarises that the current supply and demand analysis for pitch provision available to the community shows an overall spare capacity of 8 match equivalents (MES). However, the current provision of grass pitches is unable to accommodate the level of demand for youth 11v11 and mini football. The PPS suggests moving to use of 3G Artificial Grass Pitches (AGP)s could address this deficit and identifies a current shortfall of 3 full sized 3G AGPs in Crawley.

Specifically in relation to the Tinsley Lane allocation, the PPS provides an appraisal of the impact of the development on pitch capacity within Crawley borough. The appraisal considers the loss of three existing grass pitches, comprising 1x full-size pitch and 2x youth pitches on the central and southern parcels, as used by Oakwood FC (the northern parcel is not used nor is it fit for purpose for formal sports use) together with a low quality clubhouse and parking against the replacement with a full-sized 3G AGP, a 9v9 grass pitch, and new two storey modern clubhouse. The PPS highlights FA calculations which state a full sized 3G pitch could provide capacity for 38 teams. At the time of assessment, Oakwood Football Club (FC), who are based at the site, had 14 teams, many of which were already training off-site during darker months as there are no floodlights in the central area. Although the available facilities have stayed the same, Oakwood FC have since grown and now have 19 teams. Importantly, the capacity of the proposed full-sized 3G AGP provides for all of the current use and more (an additional 18 teams), increasing the overall capacity of the sports pitches on site to better cater for the needs of the club and indeed the community more widely. This pitch could be used by local schools and businesses alongside the existing club. This demonstrates that the overall impact of the proposed re-provision at Tinsley Lane will be minimal for pitch provision across Crawley and indeed beneficial overall. The completion of the development proposed within the allocation would also contribute to addressing the deficit in 3G AGPs identified in the Needs Assessment.

In addition to the positive reprovision of sports facilities at the Tinsley Lane site, CBC have confirmed there have been no further losses of playing pitches in the borough since the 2021 study was prepared and further capacity has been identified. We understand that a further full-sized 3G AGP has recently been approved at Three Bridges FC (ref CR/2020/0274/FUL) to replace the existing grass pitch. The limiting nature of grass pitches restricts use of the pitch to mainly match play, whereas an artificial surface would allow match play and training for all age groups. The below tables extracted from the committee report highlights the degree of intensified use that a 3G AGP can accommodate:

**Table 2: Existing Occupancy Use**

	Detail of Use	Number of Users	Hours per Day	Occurrences per year	Hours per Year
Football Pitch Training	Matches	40	3	70	210
	1st Team Training	20	2	100	200
Clubhouse Private Hire	Full Day	61	10	5	50
	Evening Event	61	5	63	315
Spectators	Matches	250	3	70	210
Office	Office Space	3	8	150	1200

**Table 2: Proposed Occupancy Use**

	Detail of Use	Number of Users	Hours per Day	Occurrences per year	Hours per Year
Football Pitch Training (teams that will use showers)	Matches	40	3	70	210
	1st Team Training	20	2	100	200
	YA Training	40	1	250	250
	Adult Training	40	9	50	450
Football Pitch Training (no use of use showers)	Childrens Training	60	17	50	850
	School Training	35	1	180	180
	OAP Training	20	1	50	50
Clubhouse Private Hire	Full Day	61	10	5	50
	Evening Event	61	5	63	315
Spectators	Matches	250	3	70	210
Office	Office Space	4	8	350	2800



The provision of a 3G AGP at Three Bridges FC alongside the proposed 3G AGP at Tinsley, would provide significant improvements to capacity in the Crawley area for all-weather pitches.

As a result of the provision of these new AGPs, we also understand that playing pitch capacity will then become available on nearby grass pitches such as Hazelwick School and Forge Wood Primary as Three Bridges youth teams would no longer need these facilities.

#### Vitality and viability of existing sports club

We strongly believe that the Tinsley Lane allocation would deliver modern, flexible and future-proofed sports/club facilities to ensure the continued vitality and viability of Oakwood FC for many years.

The PPS bases its assessment of the proposed development at Tinsley Lane on the club having a requirement to accommodate 14 teams that comprise Oakwood FC. However, it is understood that the Club has since expanded to 19 teams. Therefore, for purposes of this response, the following assessment is based on 19 teams using the Oakwood FC facilities.

The PPS highlights that based on FA calculations, the capacity of a single full-sized 3G AGP is assumed to be capable of accommodating 38 during peak times of demand. Therefore, it can be assumed that a full sized 3G AGP would be sufficient to accommodate the club's current needs, whilst providing additional capacity for expansion of the Club and indeed further community use (for approximately 19 additional teams) before factoring in the proposed grass 9v9 pitch. The provision of a 3G AGP would allow greater use due to durability and provide additional flexibility with pitch markings to cater for all age groups and formats, therefore addressing the existing on-site deficiencies.

In addition to the PPS, the principle of the proposed replacement of existing pitches has been reviewed by Sport England. Outline applications have been submitted in 2018 (150 units) and 2021 for 138 residential units, demolition of existing Oakwood Football Club facilities and provision of new clubhouse, senior AGP and junior grass pitch (application ref. CR/2018/0544/OUT and ref CR/2021/0355/OUT). Sport England were consulted on both occasions on the pitch re-provision and were supportive on both occasions.

Sport England assessed the loss of the existing grass pitches against exception 4 of the Sport England Playing Field Policy, which requires the replacement of playing field with equivalent or better quality, and of equivalent or greater quantity. Sport England concluded that the proposed full size AGP and grass 9v9 pitch would be considered appropriate given that ability of the 3G pitch to accommodate more intensive use and range of pitch markings. Sport England consulted the FA and Sussex County FA in their response who also confirmed that the replacement provision is acceptable in principle.

The existing clubhouse is a dated single-storey building with portacabins providing additional office/admin floorspace. Sport England outlined that the application satisfactorily demonstrates that a new clubhouse of 500sqm and all associated facilities could be accommodated. The new clubhouse would provide an opportunity for additional revenue for the club and provide a significant community asset in an area with a lack of such facilities. Sport England therefore concluded that the replacement facilities represented better provision.

The details of the replacement facilities would be subject to a reserved matters application and Homes England have committed in principle to the enhanced 3G AGP and a junior grass pitch and its ancillary structures fully meeting FA grading requirements and Sport England guidance.




It is also worth noting that Sport England has raised no objection at any stage to the continued allocation of the Tinsley Lane site during this Local Plan review.

HE firmly believe that the proposed new home for Oakwood FC would provide a significant opportunity to safeguard the club's present and provide modern day facilities and growing room for the future, ultimately ensuring the club's vitality and viability.

### Highway safety and access

As part of the thorough approach taken to the formulation of outline applications CR/2018/0544/OUT and CR/2021/0355/OUT, and in response to the requirements of the Tinsley Lane Development Brief, a full assessment of all access options has been undertaken and has concluded that, as well as being safe and technically sound, Birch Lea is the only feasible access option, in combination with Kenmara Court for football use/ emergency access. Importantly, WSCC Highways Authority have confirmed they were happy in principle with the development brief and did not object to either of the two planning applications on site. The multi-criteria appraisal considered: technical feasibility, land ownership, effect on local roads, planning constraints and policy compliance, environmental effects, delivery and cost. A summary of the assessment concludes the following:



- The need for demolition and consequential loss of existing residential properties. ③ ⑤ ⑦
- The need for third party land outwith the control of the applicant or Highways Authority. ① ② ③ ⑤ ⑦ ⑧ ⑩
- The destruction of Ancient Woodland, and loss of protected species habitat. ① ⑩
- Unacceptable effects or conflicts with existing and established businesses. ① ②
- Restricting the ability to deliver the new sports pitches and clubhouse. ① ② ③
- The environmental effects on existing residents resulting from the loss of noise and air quality barriers along Crawley Avenue and conflict with AQMA policy. ③ ⑨
- Requiring an undeliverable scale of infrastructure, such as railway bridge access from third party land ⑩ and a slip road from Crawley Avenue. ⑨  
With both these options the substantial cost and required reduction in properties and development area makes the scheme unviable.

Birch Lea = 6. Kenmara Court = 4

The road designs have developed through consultation with WSCC Highways and has been subject to a Road Safety Audit, and therefore can be deemed to be technically sound and safe. The design includes measures to widen and realign the carriageway, increase the verge on the northern side, and a package of measures to improve the amenity and streetscape for residents of Birch Lea such as additional planting and re-surfacing.



## Amenities of nearby properties

Whilst the 2018 application was refused at committee in September 2020 (against Officer's recommendation) on amenity and density grounds, the current revised application reduces the number of homes from 150 down to 138. This has the effect of improving the amenity of new and existing residents by:

- Reducing the density to 33 dph (lower than policy requirements of 45dph).
- Increasing the open space. This addresses an existing deficit in open space and play areas in the vicinity.
- Greater set back distances from existing properties through the incorporation of larger garden sizes.
- Creation of a stronger green connection and gateway to the Site, better defined public space, and the incorporation of clear green routes from Birch Lea through an enlarged central open space to Summersvere Wood.
- Reducing vehicle numbers by 10%. Speeds will also be reduced through the introduction of surface treatment.

In addition, Homes England is proposing a package of measures to improve the amenity and streetscape for residents of Birch Lea.

When assessed against the emerging Local Plan policies, HE believe that the proposed allocation can be successfully delivered without unacceptably affecting the amenity of nearby properties.

## Local biodiversity

The proposed allocation can be delivered in a way that will protect existing ecology, and make a positive and lasting contribution to local biodiversity through the sensitive management of open space areas and Summersvere Woodland, planting of new trees, and the introduction of SUDs and gardens.

Both outline applications CR/2018/0544/OUT and CR/2021/0355/OUT successfully reflect the requirements of the Tinsley Lane Development Brief including the carrying out of ecological surveys, the maintenance of an appropriate 15m buffer zone around the woodland, and the formalising of public access routes (which in turn helps protect the wider ancient woodland and ecology).

### **6.6 What is the status of the Tinsley Lane Development Brief? What does it set out / require that is not in Policy H2 or covered by other policies in the Plan?**

The Development Brief was produced jointly by Homes England and the Council. Homes England supports the content of the Development Brief and believes it has a beneficial purpose in guiding development proposals on site, forming a material consideration to the determination of the live application at the site. Whilst there is the potential for the Brief to be updated to reflect latest Local Plan policies, we believe alongside the proposed allocation wording in Policy H2 and emerging Local Plan policies, the current development brief still offers relevant development guidance.

### **6.7 Is the policy for Tinsley Lane justified and deliverable in requiring the provision of allotments?**

Homes England is seeking either the removal of reference to allotments or the return of the previous Local Plan policy, and Development Brief wording, which refers to 'consideration of' provision of allotments, allowing for sufficient flexibility.

In relation to both outline applications CR/2018/0544/OUT and CR/2021/0355/OUT, allotment space had been considered but was not deemed feasible due to the following reasons:



- the scale of the open space, play, woodland and sports facilities;
- a unique design approach which provides a continuous housing 'edge' which shields new and existing residents from noise from the Goods Yard/ Manor Royal and Crawley Avenue to the south;
- requirement for SuDS attenuation areas;
- a 15m woodland buffer from the Ancient Woodland;
- recent addition of TPO notifications for several trees and hedgerows;
- policy requiring delivery of 1 tree per home; and
- setback from the Crawley Avenue Air Quality Management Area.

To provide allotments in addition to the above requirements would necessitate the removal of a number of much needed new homes which would impact negatively on viability or the reduction in other contributions such as affordable housing, which as an Agency, we are reluctant to do.

It should also be noted that no objections were made by the council or other statutory consultees regarding the need for allotments during the determination of either outline application for the site.

### **6.8 Given the various requirements for the Tinsley Lane site in Policy H2 is there reasonable assurance that residential development would be viable?**

Homes England believe that the proposed allocation can be delivered viably and include the various policy requirements such as:

- provision of a new and significantly improved football club facilities with community use agreement.
- 40% affordable housing
- new play space
- management and formalisation of the woodland for community access
- improvements to Birch Lea and Kenmara Court
- Off-site traffic calming contribution
- 138 new trees;
- water neutrality solution and financial contribution as per Policy SDC4 wider S106 contributions and CIL

It should be noted that viability is dependent on delivering of at least the stipulated number of dwellings on site as set out in the proposed allocation. As per Q 6.2 response, it does also not allow for the delivery of allotments which is deemed excessive in the absence of identified need and required loss of residential units it would require.

### **6.3 Has appropriate regard been given to any ancient woodland or trees within or in close proximity to these sites in terms allocating these sites and assessing their capacity? Would sufficient protection be provided for by Policy GI2? Would it be necessary for soundness to de-allocate or amend the capacity of any H2 sites to account for ancient woodland so as to comply with NPPF paragraph 180c?**

In relation to Tinsley Lane, Homes England has sought to accommodate and respect Ancient Woodland, TPO trees and Ancient Hedgerows. In the current application, all development is stepped back from the Ancient Woodland boundary by 15m in line with Natural England guidance. It is proposed that current informal paths within the Woodland will be formalised to guide and improve enjoyment for users whilst protecting the Woodland. A Woodland Management Plan will guide the approach, secured via a planning condition. The proposals also embrace the policy of 1 tree per home – leading to the planting of an additional 138 trees based on current proposals. It is envisaged many of these will be planted along the southern boundary of the site.

