

Crawley Borough Council

Report to Cabinet 29 November 2017

Brownfield Land Register

Report of the Head of Strategic Housing and Planning, **SHAP/65**

1. Purpose

- 1.1 The council is legally required to publish a Brownfield Land Register before 31 December 2017 and review it at least annually thereafter.
- 1.2 A decision is sought both regarding the publication of the draft Brownfield Land Register in December 2017, and regarding arrangements for the future discharge of the council's responsibilities relating to the Register.

2. Recommendations

- 2.1 To the Cabinet
 - 2.1.1 That the Cabinet
 - 1. Notes the representations and responses to the Consultation;
 - 2. Approves the Brownfield Land Register as set out in Appendix 1 for publication;
 - 3. Delegates to the Head of Strategic Housing and Planning in consultation with the Cabinet Member for Planning and Economic Development the revision and maintenance of Part 1 of the Brownfield Land Register, such revision being limited to taking account of new planning permissions, or new allocations of land for housing made via the Local Plan review process.
 - 2.1.2 That the Cabinet recommend to Full Council that the Constitution be amended so the following functions are the remit of the Planning Committee:
 - 1. Power to approve sites for entry into Part 2 of the Brownfield Land Register;
 - 2. Power to decline to approve sites for entry into Part 2 of the Brownfield Land Register;
 - 3. Power to determine applications for Permission in Principle;
 - 4. Power to determine applications for Technical Details Consent;

And that those functions 1-4 be delegated to the Head of Economic and Environmental Services.

3. Reasons for the Recommendations

- 3.1 The recommended approach will enable the council to comply with the requirement to publish a Brownfield Land Register by 31 December 2017, and to subsequently perform its functions regarding the Register, in a lawful and appropriate manner.

4. Background

- 4.1 The preparation, maintenance and publication of The Brownfield Land Register is a new legal requirement, established by the Housing and Planning Act 2016, and introduced by the Town and Country Planning (Brownfield Land Register) Regulations 2017. It is a Register of previously developed land, within the area of a local authority, meeting certain criteria regarding potential for residential development.
- 4.2 The Register is intended to publicise brownfield sites with the aim of facilitating their use to deliver 'housing-led' development, in support of the government's agenda of increasing the supply of housing.
- 4.3 As well as functioning as an information source, the Brownfield Land Register is also designed as a means of granting a new type of planning consent called 'Permission in Principle'. Permission in Principle is a stepping-stone towards planning permission. In order to achieve planning permission a further consent called 'Technical Details Consent' must be secured.
- 4.4 The 2017 Regulations require The Brownfield Land Register to be produced into two parts:
- Part 1 is a list of all sites which are considered to meet the legislative criteria of being "suitable, available and achievable" for development and
 - Part 2 of the Register will comprise only of those sites in Part 1 that the Local Planning Authority (LPA) has decided would be suitable for a grant of Permission in Principle.

Part 1 must be published and reviewed at least annually according to the Regulations. The entry of sites on Part 2 of the Register is a discretionary, non-executive, function, subject to procedures similar to other types of planning permission. There is no intention for sites to be included in Part 2 of the Register at this stage.

- 4.5 All sites which meet the criteria set out in the Regulations should be included in Part 1 of the Register. Sites for inclusion in Part 1 must meet the following criteria:
- Land area of at least 0.25ha or the site have capacity to support at least 5 dwellings;
 - Must be **available**¹;
 - Must be **achievable**².

For the site to be considered **suitable** for housing development, it may be allocated in the Local Plan; have planning permission for residential development; or be considered suitable by the local planning authority, when considering adverse impact upon the natural or built environment or the amenity of occupiers or neighbouring properties, in having regard to the Local Plan policies and the National Planning Policy Framework (NPPF).

- 4.6 The government has published a [Data Standard](#) setting out what information should be included regarding each site on the Register, and how it should be presented. The Register is required to be presented in spreadsheet form. The prescribed information is mostly descriptive, but Register entries are also required to include figures for site capacity. Maximum dwelling totals are required where there is no

¹ Capable of development within 15 years.

² Landowner has the intention to develop or a developer has indicated such an intention, or the local authority does not consider there are any issues relating to the ownership of the land or legal impediment which might prevent residential development of the land taking place.

permission or consent in place, and minimum totals are required for all sites. Except where sites are granted Permission in Principle via the Register these figures have no direct consequences in terms of the planning process, and are not binding on future planning applications.

Public Consultation

- 4.7 The legislation allows for discretionary consultation on Part 1 of the Register, and this was considered appropriate in light of the Council's Statement of Community Involvement and the novel nature of the Register. A draft of the proposed Register and an accompanying summary document were published on the Council's website for a four-week consultation between 2 October and 30 October 2017. In addition, the Council carried out a Call for Sites consultation over the same period, inviting members of the public and interested parties to submit details of additional sites meeting the Register criteria. For this purpose a response form and associated guidance were published on the Council's website.
- 4.8 Representations arising from the consultation and Officers' responses to them are set out in Appendix 3. The main changes arising are as follows:
- Inclusion of Fire Station, Ifield Avenue, West Green, as a site capable of providing between 0 and 48 dwellings (with the maximum dependent on removal of the fire station to a different site). This site already features in the council's Housing Trajectory with an indicative capacity of 48.
 - Amendment to the boundary shown on the site plan for the Ambulance Station, Ifield Avenue, to exclude non-Brownfield land.
 - Additional information provided in the 'Notes' column regarding site constraints. This is taken from existing public sources.
- 4.9 No new sites were put forward in response to the Call for Sites.

Final Brownfield Land Register

- 4.11 The Brownfield Land Register proposed for approval to publish as the final version is attached as Appendix 1. In order to meet the government requirements, this will be published in the following formats:
- CSV
 - Excel
 - PDF Summary Document (attached as [Appendix 2](#))

5. Description of Issue to be resolved

- 5.1 As described in sections 1 to 3 above, the recommendations are seeking to respond to the new legal requirements introduced by the Town and Country Planning (Brownfield Land Register) Regulations 2017.

6. Information & Analysis Supporting Recommendation

- 6.1 The recommendations seek to comply with the requirements of the Regulations within the required time frame without diverting resources unnecessarily from other key work areas and priorities.
- 6.2. Apart from the recommendations detailed in sub-paragraph 2.1.2 the proposed approach is concerned only with Part 1 of the Register. Since the inclusion of sites in Part 2 of the Register is discretionary there are currently no plans to undertake further work in this area, but the recommendations detailed under 2.1.2 will give the Planning Committee the ability to add sites to Part 2 if the Council chooses to put any forward for consideration in future.

- 6.3 The recommendations relating to Part 1 of the Register are largely considered to follow on mechanically from the legal requirements set out in the Regulations. However, particular attention is drawn to the following areas where the council has some discretion:
- Arrangements for delegation of approval of future updates to the Register (recommendation 3 under sub-paragraph 2.1.1);
 - Approach to setting 'maximum' and 'minimum' dwelling totals for Register sites, where required. The figures given are explained in the final three columns of the spreadsheet.
- 6.4 Individual entries in Part 1 of the Register may be amended or removed in response to new information as part of the process of review required by the Regulations.

7. Implications

Financial Implications

- 7.1 There are no identified items of expenditure arising from the recommendations.
- 7.2 A [letter](#) from the Chief Planning Officer to Local Planning Authorities in England dated 31/03/2017 stated as follows in respect of the duties arising from the Regulations:
'Each local authority responsible for making planning decisions will receive a new burdens grant payment of £14,645 for 2016/17. Local planning authorities will receive further grant payments for 2017/18, 2018/19 and 2019/20; the amount of funding from 2016/17 onwards will be kept under review.'

Legal Implications

- 7.3 As set out in paragraph 4.1, The Town and Country Planning (Brownfield Land Register) Regulations 2017 places a duty on Local authorities to prepare, maintain and publish a register of brownfield sites suitable for residential development by 31st December 2017. By publishing the Register before the end of 2017, the Council will comply with this duty.
- 7.4 Regulation 19 specifically excludes any decision to include land in Part 2 of the Register and to grant planning permission in principle from being an executive decision. The recommendations detailed in sub-paragraph 2.1.2 are considered to enable the council to fulfil its functions under the Regulations in a lawful and proportionate manner.

Staffing Implications

- 7.5 Work on the Brownfield Land Register Part 1 will be ongoing and will require input both from the Forward Planning and the Development Management teams. This is to be met from existing staff resources. There is some overlap with existing Forward Planning responsibilities such as the monitoring of housing land supply, so not all the work involved will be additional to current functions.
- 7.6 The consideration of sites for entry in Part 2 of the Register is not currently proposed, but would require significant additional input from the Forward Planning and Development Management teams.

Customer Implications

- 7.7 The Brownfield Land Register is intended to make information about brownfield sites clearer and more easily accessible, and to facilitate the delivery of new housing-led

development. This should have benefits for local residents and businesses as well as landowners and developers.

Equalities Implications

- 7.8 The relevant implications are the Customer Implications detailed above. These are considered to have no adverse impact on any group protected by the Equalities Act 2010, and should instead have net benefits, e.g. through the availability of a wider choice of new homes.

Environmental Implications

- 7.9 The sites in the draft Register have already been subject to some degree of consideration via the planning process or the Local Plan examination, and their inclusion in the Register does not supersede any requirement for further permissions. In particular the approach taken by the Register falls within the framework of the Local Plan Policies listed below, which have been subject to Sustainability Appraisal:
- SD1: Presumption in Favour of Sustainable Development;
 - H1: Housing Provision;
 - H2: Key Housing Sites;
 - EC6: Development Sites within the Town Centre Boundary

Risks

- 7.10 The main risk is that the Register may overestimate the number of dwellings which a site is capable of providing and/or fail to take account of site constraints, thereby encouraging the purchase of land at inflated prices, and making it harder later on to secure sustainable, policy-compliant development. The proposed Register is therefore cautious in estimating site capacity.

8. Background Papers

Legislation:

[Housing and Planning Act 2016 \(sections 150-151\)](#)

[The Town and Country Planning \(Brownfield Land Register\) Regulations 2017](#)

[The Town and Country Planning \(Permission in Principle\) Order 2017](#)

Guidance:

[Brownfield Land Register & Permission in Principle FAQs](#)

[Brownfield Land Registers](#)

[Permission in Principle](#)

[Brownfield Land Registers Data Standard](#)

Report author and contact officer: Ian Warren, Planning Officer ian.warren@crowley.gov.uk
01293 438644

Organisation/URI	Organisation Label	Sheet Reference	Previous	Site Name/Address	Siteplan	Coordinate GcoX	GcoY	Hectares	Ownership	Deliverable	Planning Status	Permissions	Permissions	Planning Proposed	MinNetDwellings	Development Description	Nonhousing Development Part2	NetDwellings	NetDwellings	Hazardous	Site Information	Notes	First Aided	Last Updated	MinNetDwellings Comment	NetDwellings Range	NetDwellings Range	Comment
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B001		14, 20 The Broadway, Ste	http://www.crawley.gov.uk	FTSR80	51.115	-0.1977036	0.11	not owned	yes	permitted	full planning	2016-08-20	07	Demolition of existing building and erection of 18 residential units at ground level					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 57 is based on the allocation figure given in Local Plan policy H2 (Key Housing Sites) and on previously approved (now expired) scheme CR2013005FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B002		71 Brook Walk, Northgate	http://www.crawley.gov.uk	FTSR80	51.115	-0.1866292	0.06	not owned	yes	permitted	full planning	2016-08-20	7	Change of use of first floor, retail space to 3 x private flats and 4 x one bedroom flats with associated works to ground floor existing use					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 7 is based on the assumption of implementation of approved scheme CR20150137FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B004		14 Goffs Park Road, Dymley	http://www.crawley.gov.uk	FTSR80	51.111	-0.1977453	1.01	not owned	yes	permitted	decision		0						http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 0 reflects the Minimum floor area of 55 is based on allocation figure in Local Plan Policy H2 (Key Housing Sites) (C3 scenario)				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B006		17, 13 The Broadway A1, 1	http://www.crawley.gov.uk	FTSR80	51.116	-0.1978075	0.09	not owned	yes	permitted	full planning	2016-03-01	25	Conversion of 4 alterations to 1st & 2nd floors for retention & refurbishment of existing ground floor retail (A1) units					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 25 is on the assumption of implementation of approved scheme CR2015004FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B007		Waterways House, Station Way	http://www.crawley.gov.uk	FTSR80	51.113	-0.1883793	0.15	not owned	yes	permitted	planning app	2017-08-01	9	Prior approval for change of use of ground floor, part 1st floor, 2nd floor (roof) and 3rd floor from B1 (office) to C3 (residential) for 28					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 9 is based on an initial assessment, assuming a policy compliant scheme and retention of the existing building				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B008		Car Park adjacent to Central	http://www.crawley.gov.uk	FTSR80	51.117	-0.1814658	0.05	not owned	yes	permitted	decision		36						http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 36 is based on the allocation figure given in Local Plan policy H2 (Key Housing Sites) and on previously approved (now expired) scheme CR2016008FUL, which the council has resolved to grant planning permission subject to completion of a S106 agreement				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B009		Car Park, 11-13 The Rode	http://www.crawley.gov.uk	FTSR80	51.117	-0.1862861	0.27	not owned	yes	permitted	full planning	2017-07-18	91	Demolition of existing car park and the erection of a car 3 store, car 6 store & car 9 store building to provide a total of 91 flats with					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 91 is based on the assumption of implementation of approved scheme CR2016006FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B010		10 Green Buildings, Northgate	http://www.crawley.gov.uk	FTSR80	51.117	-0.1837622	1.07	not owned	yes	not permitted		50							http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 50 is based on the allocation figure given in Local Plan policy H2 (Key Housing Sites) and on previously approved (now expired) scheme CR2016006FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B012		First & Second Floor 34-40	http://www.crawley.gov.uk	FTSR80	51.115	-0.1866388	0.15	not owned	yes	permitted	planning app	2017-08-31	4	Prior approval for change of use from B1 (office) to C3 (residential) for 9 apartments, with cycle parking and refuse storage					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 4 is based on an initial assessment, assuming a policy compliant scheme and retention of the existing building				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B013		Former local authority SW	http://www.crawley.gov.uk	FTSR80	51.111	-0.2011686	0.8	not owned	yes	permitted	full planning	2017-08-25	44	Construction of 22 flats in four blocks and 22 houses in five terraces					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 44 is on the assumption of implementation of approved scheme CR20161053FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B014		Former FSB Site, Broomfield	http://www.crawley.gov.uk	FTSR80	51.111	-0.1807514	0.33	not owned	yes	not permitted		49							http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 49 is based on the allocation figure given in Local Plan policy H2 (Key Housing Sites)				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B015		Former C&A Park, Stone	http://www.crawley.gov.uk	FTSR80	51.118	-0.1867187	0.52	not owned	yes	permitted	decision		97						http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 97 is based on the assumption of implementation of approved scheme CR20150137FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B018		10 New Hall, The Boulevard	http://www.crawley.gov.uk	FTSR80	51.117	-0.1841878	1.01	not owned	yes	not permitted		0							http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 0 reflects the Minimum floor area of 180 is based on the emerging Town Hall redevelopment scheme				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B019		Land and on 24 Broomfield	http://www.crawley.gov.uk	FTSR80	51.111	-0.1868879	0.26	not owned	yes	permitted	full planning	2015-03-03	14	Erection of 14 new apartments, 20m and 30m of office floor space					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 14 is on the assumption of implementation of approved scheme CR2014086FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B020		10 New Hall, East Park	http://www.crawley.gov.uk	FTSR80	51.112	-0.1866362	0.29	not owned	yes	not permitted		48							http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 48 is based on the allocation figure given in Local Plan policy H2 (Key Housing Sites)				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B021		10 New Hall, East Park	http://www.crawley.gov.uk	FTSR80	51.112	-0.1866362	0.27	not owned	yes	permitted	planning app	2017-08-10	49	Full time residential unit numbers currently for 2nd category railway station buildings, open access, and associated structures, within use as					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 49 is based on the assumption of implementation of approved scheme CR20161046FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B022		Shower House, London Road	http://www.crawley.gov.uk	FTSR80	51.112	-0.1872059	0.26	not owned	yes	permitted	full planning	2016-02-26	111	External alterations and extensions to existing building in connection with its use as 111 flats (use class C4), together with site works to					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 111 is on the assumption of implementation of approved scheme CR2015046FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B027		Waterways House, Broomfield	http://www.crawley.gov.uk	FTSR80	51.114	-0.1882014	0.82	not owned	yes	permitted	planning app	2016-10-11	50	Prior notification of office to residential (C3) conversion 230 studio apartments, with 250 cycle parking spaces and 160 parking spaces					http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 50 is based on an initial assessment, assuming a policy compliant scheme and retention of the existing building				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B028		10 New Hall, The Boulevard	http://www.crawley.gov.uk	FTSR80	51.114	-0.1821256	1.48	not owned	yes	not permitted		99							http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 99 is based on the allocation figure given in Local Plan policy H2 (Key Housing Sites) and on previously approved (now expired) scheme CR20070114CQUT				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B029		10 New Hall, The Boulevard	http://www.crawley.gov.uk	FTSR80	51.112	-0.1865861	0.3	not owned	yes	not permitted		69							http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 69 is based on the allocation figure given in Local Plan policy H2 (Key Housing Sites) and on previously approved (now expired) scheme CR2016022FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B030		Ambridge House, Field A	http://www.crawley.gov.uk	FTSR80	51.122	-0.1872088	0.18	not owned	yes	not permitted		5							http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 5 is based on the allocation figure given in Local Plan policy H2 (Key Housing Sites) and on previously approved (now expired) scheme CR2016022FUL				
http://openstreetmap.org/data/council/crawley	Crawley Borough Council	CBCR-B031		Fire Station, Field Avenue	http://www.crawley.gov.uk	FTSR80	51.122	-0.1866763	0.45	not owned	yes	not permitted		0							http://www.crawley.gov.uk	2017-12-13	2017-12-13	Minimum floor area of 0 reflects the Minimum floor area of 48 is based on the allocation figure given in Local Plan policy H2 (Key Housing Sites) and on previously approved (now expired) scheme CR2016022FUL				

SHAP/65 APPENDIX 3: CONSULTATION REPRESENTATIONS¹

Representor	Site	Summary of comments	Council response
Savills, on behalf of Aberdeen Asset Management PLC	Former TSB Site, Russell Way, Three Bridges (CBCBLR002)	Recommended that minimum net dwelling total be increased from 40 to 95, bearing in mind: <ul style="list-style-type: none"> - Pre-application discussions - Proximity of site to public transport connections and local facilities/amenities - Unmet housing need within Crawley and wider Housing Market Area, after taking account of planned delivery 	Logically these are considered to be reasons relevant to the <i>maximum</i> rather than the <i>minimum</i> net dwelling total. Internal work regarding capacity of site is ongoing, but at present the council is not in a position to set a specific figure above 40 dwellings. This does not prejudice future applications for schemes exceeding this figure.
Aerodrome Safeguarding, Gatwick Airport Limited	All	Request consultation regarding any sites being put forward for Part 2 of the Register to gain 'Permission in Principle'	Noted.
Historic England	All	Refers to published advice; general recommendations on methodology concerning impact on heritage assets	Noted.
Natural England	All	General advice regarding approach to consulting NE and taking account of environmental/biodiversity issues	Noted.
Mr W Singh-Kakol	21 Broad Walk, Northgate (CBCBLR014)	Supports inclusion of site in Brownfield Register	Support noted.
Sport England	All	No comments, bearing in mind that no playing fields are affected.	Noted.
Sussex Wildlife Trust	All	General Guidance provided Recommends publication of an Annex of rejected sites	Noted. No additional sites were put forward in response to the Call for Sites. The Annex may be something to consider in future but it is also considered that

¹ This does not include representations which purely consisted of information regarding site ownership.

	Ambulance Station, Ifield Avenue, West Green (CBCBLR030)	<p>Recommends provision of further information on sites constraints/mitigation required in the 'notes' column</p> <p>Recommends consultation on future sites added to Part 1 of the Register</p> <p>Queries inclusion of site and requests specifically that site boundary shown is amended to take account of proximity of Ewhurst Wood Local Wildlife Site</p>	<p>this would be more appropriate for the SHLAA, which is not subject to the same detailed data standards.</p> <p>Additional information available from existing sources in the public domain has been added.</p> <p>Since there are statutory consultation requirements for Part 2, and since Part 1 must be reviewed at least annually this further form of consultation for Part 1 is not considered necessary</p> <p>The boundary shown for consultation purposes was the same as used in the SHLAA, but it has been amended for reasons given and in light of government guidance re sites which are not wholly Brownfield.</p>
Savills, on behalf of Thames Water	<p>All</p> <p>Ambulance Station, Ifield Avenue, West Green (CBCBLR030); Former TSB Site, Russell Way, Three Bridges (CBCBLR014); Longley Building, East Park, Southgate (CBCBLR020); Telford Place, Three Bridges (CBCBLR028); Town Hall, the Boulevard (CBCBLR018); Zurich House, East Park, Southgate (CBCBLR029)</p>	<p>General advice.</p> <p>On information available to date concerns are not envisaged in relation to these sites regarding wastewater infrastructure capacity</p>	<p>Noted.</p> <p>Noted.</p>

<p>Valuations and Estates, West Sussex County Council</p>	<p>County Buildings, Northgate (CBCBLR010)</p> <p>Fire Station, Ifield Avenue, West Green</p> <p>Land Adjacent Desmond Anderson, Tilgate</p>	<p>Site can accommodate a higher maximum than the Local Plan allocation of 50 – refers to ongoing feasibility work</p> <p>Notes that this Housing Trajectory Site is not included in the draft Register, and recommends inclusion</p> <p>Notes that this Housing Trajectory Site is not included in the draft Register, but that since the site is allocated in the Local Plan this should not be an impediment to its being brought forward</p>	<p>On basis of early feasibility work maximum total of 150 is included. This does not prejudice future applications for schemes exceeding this figure.</p> <p>Considered that this site can be included. Maximum net dwelling total of 48 from Local Plan on basis that this excludes a fire station on site. Minimum of 0 allowing for commercial redevelopment.</p> <p>Noted.</p>
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