

REFERENCE NO: CR/2021/0571/FUL

LOCATION: [LAND TO THE FRONT OF EWHURST PLACE, IFIELD DRIVE, IFIELD, CRAWLEY](#)
WARD: Ifield
PROPOSAL: ERECTION OF 4 X THREE BEDROOM SEMI-DETACHED DWELLINGS WITH SURROUNDING LANDSCAPING. FORMATION OF TWO NEW VEHICLE ACCESS DRIVES OFF IFIELD DRIVE WITH ASSOCIATED GARAGE AND ON-SITE PARKING

TARGET DECISION DATE: 22 September 2021

CASE OFFICER: Mrs J. McPherson

APPLICANT'S NAME: Location RH10 Ltd

AGENT'S NAME:

PLANS & DRAWINGS CONSIDERED:-

Drawing Number	Revision	Drawing Title
9166		Levels / Survey
11250_100	P2	Access Proposals
1005	P3	Proposed Streetscene
1002	P4	Plots 1 and 2 Plans and Elevations
1004	P3	Materials and Outbuildings
1001	P4	Proposed Site
1003	P4	Plots 3 and 4 Plans and Elevations
1000	P3	Location and Block Plan
2212-01		Proposed Landscaping Plan

CONSULTEE NOTIFICATIONS & RESPONSES:-

- | | | |
|-----|---|--|
| 1. | WSCC Highways (including re-consultation) | No objection subject to conditions and informatives |
| 2. | Historic England | No specific comments but recommend the views of specialist conservation and archaeological advisors are sought. |
| 3. | Thames Water | No comments received. |
| 4. | CBC Planning Arboricultural Officer | Objection to loss of trees and adequacy of mitigation. |
| 5. | CBC Contaminated Land Officer | Advised no comments to make. |
| 6. | CBC Refuse & Recycling Team | No objection. |
| 7. | Southern Water Ltd | Advice provided. |
| 8. | CBC Energy Efficiency & Sustainability | No objection subject to conditions |
| 9. | Listed Building Officer (including re-consultation) | Objection – the loss of the tree belt would result in less than substantial harm and as such would not preserve or enhance the significance of the designated heritage asset (Ewhurst Place) |
| 10. | Archaeology Officer (including re-consultation) | No objection subject to condition |
| 11. | Ecology Officer | No objection subject to conditions |

NEIGHBOUR NOTIFICATIONS:-

14 & 32 Ifield Drive; Dower Cottage; Ewhurst Place.

RESPONSES RECEIVED:-

None.

THE APPLICATION SITE:-

- 1.1 The application site is an area of land which forms part of the front (southern) curtilage of Ewhurst Place which is a grade II* listed moated building located immediately to the north. The site is located between Ifield Drive and a swimming pool (within the garden area of Ewhurst Place) and is bounded to the east by 14 Ifield Drive and to the west by an access drive which provides vehicular access to Ewhurst Place and Dower Cottage (to the north west). Ewhurst Place is not readily visible from public views along Ifield Drive as there is a substantial tree screen restricting the views from the south which runs across the application site and continues eastwards behind the rear gardens of nos 2-14 Ifield Drive.
- 1.2 The site itself is relatively level and is intersected towards its northern boundary by a tree belt which delineates a historic boundary to Ewhurst Place. To the south the land is rough grassland/ scrub and is enclosed by a 1m high close boarded fence along the access drive and adjacent to Ifield Drive with a conifer and hedge boundary to the east. A small section of the site beyond the tree boundary is currently part of the formal garden to Ewhurst Place. It is laid with grass and shrubs and slopes gently down towards the edge of the swimming pool.

Site Constraints

- 1.3 The tree belt running roughly east / west across the site is protected by the 'The Crawley Borough Order Ewhurst Place No. 1' Tree Preservation Order (Group A1) 08/2021 which was served in November 2021 following submission of the planning application in July 2021. The TPO which covers approximately 23 trees was confirmed by the Planning Committee on the 25th April 2022.
- 1.4 According to the CBC Mapping the 'Ewhurst Place Medieval Moated Site ' Archaeological Area intersects the northern part of the application site extending from Ewhurst Place to its southern its southern edge located along the east /west tree belt. It should be noted that the Historic England mapping shows the Scheduled Monument boundary for the site located to the north of the application site with its southernmost boundary extending along the southern edge of the moat.
- 1.5 Ewhurst Place to the immediate north of site is a Grade II* listed moated building (late C16 or early C17 L shaped 2 storey timber framed house) and 'The Bridge' at Ewhurst Place crossing the moat is also Grade II listed structure in its own right.
- 1.6 There is linear area of filled ground extending from the moat to the west of the swimming pool, under the tree belt and that kinks back towards Ifield Avenue intersecting the west of the site. It is marked on the Council mapping as 'unknown filled ground'.
- 1.7 The application site is supplied with water by Southern Water from its Sussex North Water Resource Zone (SNWRZ). This supply is sourced from abstraction points in the Arun Valley, which includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site.

THE PROPOSED DEVELOPMENT:-

- 2.1 Planning permission is sought for the erection of 2 pairs of 3 bedroom (5 bedspace) semi-detached houses. The plots would be aligned fronting onto Ifield Drive, set broadly in line with the properties to the immediate east and west. Each pair of semis would share an access onto Ifield Drive.
- 2.2 The houses would be 2 storey and of a design and materials to match the surrounding properties immediately fronting Ifield Drive. The floor layouts would be handed and the two middle plots would

have single integral garages to the sides. All houses would have 2 parking spaces each. A private garden for each dwelling would be provided and the rear garden boundaries would be 'squared off' to run parallel with the rear elevation of the buildings and would be delineated by a 1.8 m high close boarded fence.

2.3 The following documents were submitted to accompany the application:

- Design and Access Statement
- Affordable Housing Statement
- Sustainability Statement
- Arboricultural Impact Statement / Tree Rebuttal letter (Dec 21) / Revised Arboricultural Impact Assessment (August 22)
- Transport Report
- Preliminary Ecological Appraisal / Ecological Assessment
- Heritage Statement (May 21) / Heritage Rebuttal letter (Dec 21) / Heritage Rebuttal letter (Feb 22) / Revised Heritage Statement (July 22) / Heritage Rebuttal Statement (January 23)
- Archaeological Desk-based Assessment (Nov 21)
- Water Neutrality Report (July 23) with Sanitary and Appliances Information

PLANNING HISTORY:-

Application Site

3.1 There is one planning record relating to the substantive southern part of the application site. In 2006 an application for the 'Frontage Land at Ewhurst Place, Ifield Drive', (the land south of the tree belt), for two detached houses ref. CR/2006/0189/OUT was withdrawn. The principle concern with this application was identified as the acceptability of site access and traffic increase.

Ewhurst Place

3.2 The following works have taken place within the immediate curtilage of the Ewhurst Place building as seen on site today including:

- CR/1995/0552/LBC – Listed building consent to replace existing wooden garage with a concrete garage – Consented December 1995
- CR/185/64 – Proposed implement shed for storage of garden equipment – permitted April 1964

Surrounding New Town Properties

3.3 The new town neighbourhood of Ifield has developed around Ewhurst Place since the designation of Crawley New Town in 1947. The properties in Ardingly Close (except no 7), numbers 2-50 Ifield Avenue (evens) and 12 and 14 Climping Road were developed under application reference CR/418/1964. This planning permission from August 1964 was for 60 dwellings. The current vehicular access to Ewhurst Place from Ifield Drive, which was a new road serving this wider development, would have been provided around this time.

Dower Cottage

3.4 In July 1967 planning permission was granted for dwelling to the west of Ewhurst Place (Reference CR/201/1967). A revised house design was submitted and approved in April 1968 (Reference CR/208//1968), this latter permission was implemented and the property is known Dower Cottage.

7 Ardingly Close (and surrounding land between 5 to 27 Ardingly Close)

3.5 In November 1965 permission was granted for a 'staff dwellinghouse' on a triangular piece of land to the east of Ewhurst Place. In March 1966 (Reference CR/20/66) Approval of Reserved Matters to outline application CR/584/65 was given. This property is 7 Ardingly Close.

- 3.6 In 1990 two applications were submitted for redevelopment of 7 Ardingly Close, including a strip of land between numbers 5 and 27 Ardingly Close . Both applications proposed demolition of the bungalow and its replacement with flats. Application CR/655/90 for 25 flats was refused by the Council, while application CR/656/90 was not determined. A joint appeal for both applications was dismissed in October 1990 the Planning Inspector ruling that *'the effect on the setting of the listed building of Ewhurst Place would be significant to a harmful degree which justifies refusal of planning permission'*.

PLANNING POLICY:-

Planning (Listed Buildings and Conservation Areas) Act 1990

- 4.1 Section 66(1) - *"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*.
Section 72(1) - *"In the exercise, with respect of any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character and appearance of that area"*.

The National Planning Policy Framework (September 2023):

- 4.2 The National Planning Policy Framework (NPPF) states that the purposed of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 states that achieving sustainable development means the planning system has three overarching objectives which are interdependent and need to be secured in mutually supportive ways. These are:
a) an economic objective – "to help build a strong, responsive and competitive economy..."
b) a social objective – "to support strong, vibrant and healthy communities...."
c) an environmental objective- "to contribute to protecting and our enhancing our natural, built and historic environment..."
- 4.3 **Section 5** emphasises the need for the planning system to deliver a sufficient supply of homes including affordable housing.
Section 8 seeks to ensure planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction and are safe and accessible.
Section 9 sets out transport considerations for new development including potential impacts on the existing transport network/s, opportunities for sustainable modes of transport and the need to focus development in sustainable locations.
Section 11 - 'Making effective use of land' states in para 119 that *"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions"*. The redevelopment of underutilised land and building. is encouraged.
- 4.4 **Section 12** - 'Well designed places' states that good design is a key aspect of sustainable development and that the planning process should achieve the creation of high quality buildings and places. Para 130 states:
Planning policies and decisions should ensure that developments:
a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, (including green and other public space), and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

Para 131 highlights the important contribution of trees to the character and quality of urban environments as well as their contribution to climate change with existing trees to be retained wherever possible.

- 4.5 **Section 16** – ‘Conserving and enhancing the historic environment’ provides guidance on development proposals that impact on heritage assets. Para 194 states: *‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation’*
- 4.6 Paragraph 195 continues *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”*
- 4.7 Paragraphs 199-208 provide detailed guidance on how the impacts on heritage assets should be considered.

Crawley Borough Local Plan 2015-2030 (Adopted December 2015)

- 4.8 Policy SD1 (Presumption in Favour of Sustainable Development) is the overarching policy for this plan. Development will be supported when it complements Crawley’s character as a compact town within a countryside setting, developed on a neighbourhood principle and maximises the opportunities for sustainable travel. Development will be supported where it respects the heritage of the borough and protects, enhances and creates opportunities for Crawley’s unique Green Infrastructure and accords with the policies and objectives set out in this plan unless material considerations indicate otherwise.
- 4.9 Policy CH1 (Neighbourhood Principles) states that the neighbourhood principle would be enhanced by maintaining the neighbourhood structure of the town with a clear pattern of land uses and arrangement of open spaces and landscape features.
- 4.10 Policy CH2 (Principles of Good Urban Design) The policy seeks to assist in the creation, retention or enhancement of successful places in Crawley. In particular development proposals will be required to:
 - (a) *to protect and/or enhance heritage assets,*
 - (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,*
 - (d) *make places that connect with each other and are easy to move through,*
 - (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”.*

- 4.11 Policy CH3 (Normal Requirements of All New Development) All proposals should be based on a thorough understanding of the significance and distinctiveness of the site, be of a high quality in terms of its design, sympathetic to its surroundings, provide a good standard of amenity for future occupants, retain trees which contribute positively to the area, meet its own operational requirements and demonstrate that it addresses the principles included within both 'Secure by Design' and 'Building for Life' criteria.
- 4.12 Policy CH5 (Standards for All New Dwellings) sets out the standards for all new dwellings and states that the minimum size for each dwelling should be based on the Nationally Described Space standards and be capable of adaption though meeting Building Regulations Part M Category 2. Residential developments should be designed to include amenity space standards adequate to meet basic privacy, amenity and usability requirements.
- 4.13 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 however, where the Local Planning Authority agrees this is not feasible or desirable commuted sums will be sought in lieu on a per tree basis.
- 4.14 Policy CH8 (Important views) identifies important views which should be protected. The site is within the long distance view from Tilgate Park.
- 4.15 Policy CH12 (Heritage Assets) states that all heritage assets are a finite resource and all development should ensure their key features or significance are not lost as a result of development. Development proposals affecting a heritage asset should describe the significance of any development assets affected and the contribution made by their setting, the impact of the development and any measures to ensure the asset is respected, preserved or enhanced.
- 4.16 Policy CH15 (Listed Buildings and Structures). Works will be consistent with the character, appearance and heritage value of the Listed Building in line with national legislation, policy and guidance. Any changes must preserve or enhance the design and character of the Listed Building and its setting having regard to its historic significance. Listed Building should be retained.
- 4.17 Policy H1 (Housing Provision) states that Council will positively consider proposals for the provision of housing to meet local need.
- 4.18 Housing policy H3 (Future Housing Mix) states that all housing development should provide a mix of dwelling types and sizes to address local housing needs and market demand.
- 4.19 Policy H4 (Affordable and Low Cost Housing) requires 40% affordable housing from all residential developments. In addition 10% low cost housing is required on developments for 15 or more dwellings. These targets will apply unless evidence can be provided to show that the site cannot support those requirements from a viability perspective and that the development clearly meets a demonstrable need.
- 4.20. Policy ENV1 (Green Infrastructure) advises that Crawley's multi-functional green infrastructure network will be conserved and enhanced through various measures including protection, enhancement and integration with new development, mitigating harm and maintaining and extending links where possible, including through larger proposals.
- 4.21 Policy ENV2 (Biodiversity) states that development proposals will be expected to incorporate features to encourage biodiversity where appropriate, and where possible enhance existing features of nature conservation value within and around the development
- 4.22 Policy ENV5 (Provision of Open Space and Recreational Facilities) requires development to make provision for open space and recreational facilities and confirms that the Community Infrastructure Levy will be used to enhance open space to mitigate the impact of increased population.

- 4.23 Policy ENV6 (Sustainable Design and Construction) requires all development to demonstrate how it will meet sustainability objectives both in its design and construction processes and achieve BREEAM excellent for water and energy credits where viable.
- 4.24 Policy ENV9 (Tackling Water Stress) requires all new dwellings to achieve the new 'optional' water efficiency standard introduced into part G of the Building Regulations in 2015, subject to viability and technical feasibility.
- 4.25 Policy ENV10 (Pollution Management and Land Contamination) ensures that new development does not increase levels of pollution or hazards and is appropriate to its location. Where a site may be at risk from contaminants or hazardous materials, information must be provided on how the risk will be addressed and pollution treated or removed.
- 4.26 Policy IN1 (Infrastructure Provision) seeks to ensure development will only be permitted where it is supported by the necessary infrastructure on site or through off site mitigation and advises that CIL will be sought through the relevant processes.
- 4.27 Policy IN2 (Strategic Delivery of Telecommunications Infrastructure) requires all residential, employment and commercial development to be designed to be connected to high quality communications infrastructure.
- 4.28 Policy IN3 (Development and Requirements for Sustainable Transport) Advises that development should be concentrated in locations where sustainable travel patterns can be achieved.
- 4.29 Policy IN4 (Car and Cycle Parking Standards) sets out that development will be permitted where the proposals provide the appropriate amount of car and cycle parking to meet its needs assessed against the Council's car and cycle parking standards. For residential development standards are based on the accessibility of the area, the levels of car ownership and size of any new dwellings.

Draft Crawley Borough Local Plan 2024-2040 - May 2023

- 4.30 The Local Plan 2024-2040 was submitted for examination on 31 July 2023. The examination Hearings commenced in November 2023. Limited weight should therefore be given to the following policies:
- SD1 – Presumption in Favour of Sustainable Development
 - SD2 – Enabling Healthy Lifestyles and Wellbeing
 - CL1 – Neighbourhood Principle
 - CL2 – Making Successful Places – Principles of Good Urban Design
 - CL3 – Movement Patterns, Layout and Sustainable Urban Design
 - CL7 – Important and Valued Landscape and Views
 - DD1 – Normal Requirements of All New Development
 - DD2 – Inclusive Design
 - DD3 – Standards for All New Dwellings (including conversions) –
 - DD4 - Tree Replacement Standards
 - HA1 – Heritage Assets
 - HA4 - Listed Buildings and Structures
 - IN1 – Infrastructure Provision
 - H1 – Housing Provision
 - H3 – Housing Typologies
 - H3b – Densification, Infill Opportunities and Small Sites
 - H4 – Future Housing Mix
 - H5 – Affordable Housing
 - GI1 – Green Infrastructure
 - GI3 – Biodiversity and Net Gain
 - SDC1 – Sustainable Design and Construction
 - SDC4 – Water Neutrality
 - ST1 – Development and Requirements for Sustainable Transport
 - ST2 – Car and Cycle Parking Standards

- 4.31 Following public consultation in summer 2023 the following policies received only supportive comments or have no significant unresolved objections and there therefore considered to have significant weight. These are:
- 4.32 Policy HA7 (Heritage Assets of Archaeological Interest) which states *“Development proposals in the vicinity of a Scheduled Monument, or any heritage asset with archaeological interest which is demonstrably of equivalent significance (i.e. ‘designated’ archaeological assets), will be expected to preserve or enhance the asset and its setting, including through the protection of the asset from disturbance associated with development activity, and through the avoidance of patterns of movement or land use which may cause harm to, or loss of, the significance of an asset over time. Development should identify and pursue opportunities to better reveal the significance of such assets.”*
- 4.33 The policy requires proposals impacting such assets to be supported with a Heritage Impact Assessment and any harm to, or loss of, the significance of any designated on non-designated archaeological heritage asset involved in a development proposal to be considered in line with national and local policy, according to the significance of the asset and the degree of loss and harm.
- 4.34 Policy IN3 (Supporting High Quality Communications) requires residential development of one unit or more to have provision for gigabit-capable full fibre broadband.
- 4.35 Policy EP3 (Land and Water Quality) seeks to ensure people’s health and quality of life, property and the wider environment will be protected from land contamination.
- 4.36 Policy EP6 (External Lighting) states that development must demonstrate how it will minimise light pollution to as to avoid significant harm to biodiversity and prevent unacceptable sky glow, glare, light spillage and unnecessary energy usage.

Other Material Considerations:

Green Infrastructure SPD (adopted October 2016) (GISPD)

- 4.37 This document includes a costing of £700 per tree in lieu of on-site planting. The document also links to the Urban Design SPD and in respect of considering landscaping as part of high quality design.

Planning and Climate Change (adopted October 2016) (PCCSPD)

- 4.38 This sets out a range of guidance to reduce energy consumption, minimise carbon emissions during development, support District Energy Networks, use low carbon or renewable energy sources, tackle water stress, cope with future temperature extremes, deal with flood risk and promote sustainable transport.

Urban Design (adopted October 2016) (UDSPD)

- 4.39 This document includes further guidance, examples and explanations of the principles of good urban design, public realm design. It also includes guidance on outdoor amenity space standards. The adopted parking standards are contained in Annex 1 of this document, the minimum indicative parking standard for this development is 2-3 spaces per dwelling. Secure cycle parking provision is also specified as 1 space per 1 bed dwelling, 2 spaces for 2 bedroom dwellings and 1 space per 8 dwellings for visitors
- 4.40 The document provides guidance on approaching development within conservation areas suggesting amongst other things that the relevant Conservation Area statement is considered and its recommendations incorporated and reviewing the guidance provided by Historic England.

Affordable Housing SPD (adopted November 2017) (AHSPD)

- 4.41 This document provides guidance on the requirements of policies H3 and H4 in the Crawley Borough Local Plan and in particular when affordable housing would be sought from residential development.

Crawley Community Infrastructure Levy Charging Schedule 2016

- 4.42 The Crawley CIL Charging Schedule is in effect from 17 August 2016 and is also relevant to this application as the proposal would create new dwellings.

PLANNING CONSIDERATIONS:-

- 5.1 The key planning considerations in relation to this case are discussed under the headings listed below:
- Principle of the development;
 - Heritage impact;
 - Impact on trees and ecology;
 - Building design and impact on the street scene;
 - Adequacy of accommodation for future occupiers;
 - Impact of the development on the amenities of neighbouring properties/occupiers;
 - Transport requirements (highways, parking, servicing, cycles);
 - Sustainability;
 - Ground conditions (contamination);
 - Affordable housing provision and infrastructure contributions;
 - Water neutrality.

Principle of the Development

- 5.2 The application site forms part of the grounds of Ewhurst Place, a grade II* moated listed property to the north. The application site is intersected towards its northern side by a belt of trees that mark the boundary between the formal garden of Ewhurst Place, whilst to the south of the trees the land is open grass. The land south of the tree belt appears as a remnant of farmland left undeveloped when Ifield neighbourhood was built around Ewhurst Place. The site lies a relatively short distance away from Crawley town centre and is within the built-up area boundary.
- 5.3 It is considered that the principle of using this curtilage land for residential use could be supported provided the development complies with all other policies in the development plan and in particular policy SD1 which sets out the strategic objectives for development which includes respecting the heritage of the Borough.
- 5.4 The proposal would provide an additional four houses, which would represent a small benefit in terms of housing delivery and helping to meet Crawley's needs. The proposal represents an intensification of existing residential use in a sustainable location within the built-up area and, in principle, it is considered acceptable in planning policy terms.

Heritage Impact

- 5.5 The NPPF 2023, Annex 2: Glossary defines a 'Heritage Asset' as: *'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'*' The NPPF2023 Annex 2: Glossary also defines 'Historic Environment' as: *"All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora."*
- 5.6 In this case the application site is immediately to the south of Ewhurst Place which is recorded nationally for its heritage value both in terms of below ground (archaeology) and above ground (historic buildings in their setting). It should be noted that landscaping can form an integral part of that heritage interest.
- 5.7 Historic England advised that CBC should rely on the views of their specialist archaeology and heritage / conservation advisors, both of whom have been consulted in respect of this application.

Archaeology

- 5.8 The application site lies to the south of Ewhurst Place, the immediate grounds of which are designated as a Scheduled Monument (as a nationally important Medieval moated Site). The Scheduled Monument boundary extends more generously around the moat to the north, east and west and extends as far as southern bank of the moat along its southern edge. This in effect excludes the southern part of the curtilage which includes the swimming pool. The application site therefore would not encroach the area defined as the Scheduled Monument.
- 5.9 An archaeological desk-based assessment was provided in support of the application which concluded that no known Heritage Assets connected with the nationally important Medieval Moated Site, (or otherwise), are present within the application site boundary, but that there is relatively high potential for previously unknown Heritage Assets to be present given that the site has been relatively undisturbed by past activity.
- 5.10 The CBC Archaeological Advisor (whose advice is limited to below ground archaeological remains only) noted the report's conclusions, and comments *"it is likely that much of the site may have been relatively undisturbed by past activity, and that any archaeological features which may have been present are likely to have survived to some extent. It is therefore likely that any archaeological deposits present within the site will be adversely affected by the new housing development"*. On this basis, further archaeological work would be required to be secured via a pre-commencement condition requiring a Written Scheme of Investigation be agreed. This is likely to take the form of an appropriately scaled trench evaluation to determine the location, extent, character, date, condition, significance and quality of any Archaeological Assets that are and may be present on site and this would inform any mitigation measures, if necessary.

Heritage Conservation

- 5.11 The application proposes the removal practically all of the 23 trees which form a tree belt extending roughly east-west across the northern portion of the site. These trees while not historic in age and in themselves not of exceptional quality, do delineate an important historic tree or hedge boundary which provides separation between the formal gardens around Ewhurst Place and the land parcel to the south.
- 5.12 The Conservation Officers assessment of the heritage information provided by the applicant, identifies from the various historic maps, that the current tree belt marks an historic boundary to Ewhurst Place from at least 1870 and therefore this tree line is of historic value.
- 5.13 The Conservation Officer further comments:
'Whilst this tree belt may have formerly been hedgerow that has been allowed to grow up and may have been added to over the years, it makes a positive contribution to the sense of place and its loss would negatively impact upon the setting of the designated heritage assets, resulting in the loss of an historic boundary, opening up of the land and changing the relationship with the building as a consequence of the relocation of this tree belt further to the north.'

The Heritage statement suggests that the current trees which have been served with TPO's for their protection were planted in the late 20th century however the report fails to make the assessment that they were planted on the historic boundary between Ewhurst Place and the open fields to the south and as such have failed to address the contribution this boundary makes within assessment of Significance (Setting).

It remains the view of the author that the existing tree belt which is representational of an established boundary that informs upon the past use of the land and therefore makes a positive contribution to the designated heritage assets settings. The loss of this tree belt would result in less than substantial harm and as such would not preserve or enhance the significance of the designated heritage asset. This harm would be cumulative to the further harm caused by the development of the parcel of land which would see the encroachment of urbanised form that would subsume the southern views afforded of Ewhurst Place when looking north from the recreation park."

- 5.14 It is considered that the Conservation Officers concerns should be afforded considerable weight. Ewhurst Place is currently screened from Ifield Avenue by the tree belt and the presence of the property on the site is only just visible by glimpses of the roof over and through the tree line. The building when viewed from within the tree boundary on approach along the access drive has an attractive landscaped setting of which the application trees form an integral part. The building is experienced in a well landscaped curtilage screened from much of the new development around it.
- 5.15 The application trees form part of a wider tree belt which extends to the (north)east beyond the properties numbered 2-14 Ifield Drive and these trees are visible over the roofs of these properties providing some legibility to the historic boundary behind. These trees contribute to the landscaped setting of the listed building, and it can be seen from the historic mapping that the new town development further east of the application site followed the historic tree boundary which curves slightly northwards with the tree boundary retained around the curtilage of the listed building and a slightly curved fence line provided for the new houses.
- 5.16 It is considered that the loss of the historic tree line would remove this historic boundary feature from the landscape and would form an unnatural straight boundary. It would result in an encroachment of the gardens of the new houses into the historic curtilage of this important Listed building. The loss of loss of the trees would also open up views of Ewhurst Place from the south adversely altering the setting of the building as the proposal would result in the historic building being viewed in the context of more modern built development in the foreground, rather than its current treed setting. While the applicants argue that a new tree boundary would be provided, this could take many years to establish and the loss of the historic boundary would be permanent and irreplaceable.
- 5.17 While the applicants have disputed the importance tree boundary feature, stating that the trees are a more recent addition and that views of the building were afforded from the south in the past, it is considered these are now more important to the setting of the listed building given the other development that has occurred around Ewhurst Place since the 1960's. While it is accepted the current trees along the boundary are maturing and have the scope to grow larger, it is clear from the historic mapping that they are situated on an historic boundary feature (whether it be ditch, hedge or trees) and the loss of this feature would not preserve or enhance the significance of this heritage asset.
- 5.18 It is therefore considered that the loss of the tree screen would result in less than substantial harm and would not preserve or enhance the significance of the heritage asset the harm being cumulative with the development of the land parcel and the encroachment of urban form when viewing Ewhurst Place from the south. The development is therefore considered to be contrary to policies SD1, CH12 and CH15 of the Local Plan and policy HA of the draft Local Plan which should be afforded significant weight along the advice set out in chapter 16 the NPPF 2023
- 5.19 It should be noted that the Conservation Officer did suggest to the applicant that if the tree belt / historic boundary were retained and remained defined, a more limited number of houses could be accommodated on land south of the tree line. This would reduce the number of dwellings on the plot but would overcome the objection to the loss of this feature. The applicant has not chosen to amend the layout.

Impact on Trees and Ecology

- 5.20 The east / west tree belt is protected by a Tree Preservation Order (TPO) Reference 08/2021. This was served after the application was submitted as the application proposed the loss of all the trees. The TPO covers all the trees on the site for their group amenity value rather than their quality as individual specimens. The trees are highly visible and make a valuable contribution to the street scene. A report was taken to the planning committee in April 2022 to consider objections made to the TPO. After consideration of the objections, the Order was confirmed with an amendment removing the more recently planted hedge boundary (along the eastern side of the site). The main east - west tree boundary was agreed for confirmation. The committee noted historic nature of the boundary was disputed by the objector.
- 5.21 The Council's Arboricultural Officer objects to this application due to the loss of the tree screen and because the replanting proposals would not sufficiently mitigate the trees lost. The original submitted

proposal was considered to have inadequate space for new trees and there is a poor species choice. There was also concern that the trees would not be able to become substantial enough to replace the specimens lost without conflict with the future occupiers of the gardens. The applicants have sought to address this concern by amending the application site boundary to incorporate some more of the land north of current tree line, but south of the swimming pool into the application site to accommodate more trees. This would allow for more screening to be planted.

- 5.22 The revised Arboricultural Impact Assessment surveyed the trees now subject of the TPO. All but one tree on the application site is proposed to be removed, a loss of approximately 22 trees. The revised planting plan seeks to plant one or two trees in the rear garden of each house and two further trees within the curtilage of Ewhurst Place as mitigation for the loss of the existing tree screen. While these trees would be more generously spaced, a better species choice and would be capable of achieving a greater maturity, the concern still remains about the pressure for future works or to remove the new trees as they mature within the rear gardens, which ultimately could result in the loss of screening between the new dwellings and the listed Ewhurst Place to the north. Overall, the revised planting plan is not considered to be adequate mitigation for the loss of the existing tree belt which has considerable landscape and amenity value.
- 5.23 Further trees are also shown to be planted to the front of the site. The overall number of trees to be planted would not address the tree planting standards set out under policy CH6 which requires 1 tree for each new dwelling and reprovision of any trees lost on at least a 1-1 basis (depending on the size of the tree) or payment in lieu if the required level of on-site planting cannot be achieved. It is therefore considered that the proposed development has an unacceptable impact on the existing tree belt, which cannot be adequately compensated for within the new site layout and due to the reprovision within the rear gardens, there would be pressure in the future for the removal of the new trees. The proposal is therefore considered to be contrary to policies CH2, CH3 and CH6 of the Crawley Borough Local Plan and the advice in the Green Infrastructure SPD.
- 5.24 In terms of ecology, the CBC Ecological advisor has advised there are no biodiversity reasons for refusal subject to securing a biodiversity management plan and ensuring site clearance in accordance with the details provided.

Building Design and Impact on the Street Scene

- 5.25 Local Plan policies CH2 and CH3 state that all proposals for development must be of high quality in terms of their urban, landscape and architectural design and relate sympathetically to their surroundings in terms of scale, height, massing, layout, details and materials.
- 5.26 The proposed houses would be semi-detached properties and have been designed to complement with the existing nearby new town properties which are also semi-detached in style. The design is considered sympathetic to the street scene along Ifield Drive with floor and ridge levels set to match the properties to the either side and the houses are set roughly in line with the existing building line and orientated to front the street. The detailing and materials are also considered to reflect the new town architecture and would respect the simple design features and architectural proportions of the surrounding buildings.
- 5.27 The development as designed is considered to relate well and would appear visually consistent with the street scene in Ifield Drive. In terms of design and visual appearance in this street scene context it is considered the development would comply with the Local Plan policies listed above.

Adequacy of Accommodation for Future Occupiers

- 5.28 Policy CH5 of the Crawley Borough Local Plan states that all dwellings must create a safe, comfortable and sustainable living environment, and also sets out the minimum sizes for dwellings, based on the Nationally Described Space Standards. The proposed houses would all be of an identical layout but handed. It would provide three bedroom, five person houses with internal floorspaces of 98 square metres. This would exceed the minimum internal space standard of 93 square metres and the development would therefore accord with Policy CH5 of the Local Plan in this regard.

- 5.29 The Urban Design SPD seeks 90 square metres of usable external private amenity space for a new house capable of accommodating 5 occupants. The proposed rear gardens measure as follows: Plot 1 - 90 sqm, plot 2 - 121 sqm, plot 3 - 121 sqm and plot 4 - 110 sqm. All would have a minimum garden depth of 11 sqm and would meet or exceed the required private amenity space requirements.
- 5.30 It should be noted however that as mitigation for the loss of the tree boundary on the site and to provide a form of mature landscaped screening, one or two trees are proposed to be planted within each new garden. With this requirement it is considered that this would reduce the amount of useable garden space and put pressure for future works to the trees to manage them in the garden setting. The situation for plot 1 is very tight and it is noted that the introduction of kinked boundary by the applicant was to address requirement of additional tree planting to re-provide screening between the rear gardens of the new dwellings and Ewhurst Place as plot 1 would fall below the usable garden area if tree planting had to be provided within its curtilage. While the garden sizes in themselves are adequate, it is not considered that the requirement for mature landscaping within the rear garden plots to provide the replacement visual screening is suitable, effective or practical mitigation in the context of this development. The proposal is therefore considered to conflict with policies CH3, CH6 and the advice in the Green Infrastructure SPD in this regard.
- 5.31 The CBC Waste and Recycling Officer has no objection to the servicing arrangements for the development noting that all properties have space to store individual bins within their boundaries for front edge kerbside collection. All dwellings have side access to the rear gardens.

Impact of the Development on the Amenities of Neighbouring Properties/Occupiers

- 5.32 The application site is surrounded by residential properties to the north, east and west. The impact on these properties is considered in more detail below. Ewhurst playing fields are situated to the south of the site.
- 5.33 Ewhurst Place is situated immediately to the north with its extensive grounds including the intervening moat which surrounds the property. The rear windows of the new houses would be over 50 metres away from the nearest windows in Ewhurst Place and given this distance and the existing and proposed landscaping there is considered to be no harmful loss of privacy or amenity to this property.
- 5.34 Number 32 Ifield Drive is located to the west of the application site and is separated from the site boundary by the access drive serving Ewhurst Place and Dower Cottage. A mature hedge runs along the western side of the access drive providing screening to the property which has a detached garage along its eastern boundary. The nearest house (plot 1) would be positioned so that its front wall is set 1.5m behind the front wall of number 32 and rear wall would 1.5m beyond the existing rear wall of number 32. As a result, there would be no overlooking or change in outlook from the front or rear windows of this neighbouring house. The distance between the flank walls would measure 11.5 m, and number 32 has a bedroom window in its flank wall at first floor level facing east, the new dwelling (Plot 1) would have one bathroom window which would be obscure glazed with a high-level opening fanlight facing west towards this dwelling. It is not considered that there would be a loss of privacy to the occupiers of this house, and it is not considered that the flank wall of the new house would appear overbearing given the separation distance and intervening hedge / access drive.
- 5.35 Number 14 Ifield Drive is located to the east, with its side boundary immediately adjoining the application site. This property has a detached garage to its west side and a west facing 1st floor bedroom window in the flank elevation. The nearest property (plot 4) would be set back 1.5 m behind the front wall of this neighbour and extend 1.5 m beyond the rear wall. In this case again, it is also not considered there would be any overlooking or change in outlook from the front or rear windows of this neighbour. The distance between flank walls would measure 8.2 metres and the first floor bedroom window of no 14 would have a partial outlook onto the flank wall of plot 4. Plot 4 would have one bathroom window which would be obscure glazed with a high level opening fanlight facing east so it is considered that there would be no harmful loss of privacy and with the slight set back of 1.5m the bedroom window would not have a completely obstructed outlook. In this case the setback and separation distance is considered adequate to safeguard the light and outlook for this house's occupiers.

- 5.36 In conclusion, it is considered that the proposed houses would not result in a harmful impact on the amenities of the neighbouring occupiers and the development would therefore comply with policy CH3 in the Local Plan in this regard. It is noted that the houses in this part of Ifield Drive are of a uniform design that have a bedroom window in their flank elevations however, in this case the level of separation between these properties and the proposed new houses are considered adequate and comparable with the existing gaps between other houses of this design along this part of the street.

Transport Requirements (Highways, Parking, Servicing, Cycles)

- 5.37 The Local Highway Authority (LHA) has no highway safety concerns and comments that the two proposed shared accesses serving each pair of semi-detached houses are adequate and these works could be carried out under a vehicle crossover licence. In addition, conditions are recommended to ensure adequate access, parking and turning, cycle parking and EV charging provision for the development.
- 5.38 The LHA also commented on the site planning history and its previous highway objection to application reference CR/2006/0189/OUT, stating that it *'raised an objection on highway safety grounds as the traffic calming feature had not been demonstrated on the plans and the proposed access arrangement may have resulted in a difficult left turn into the access'*. The LHA further comment that they are satisfied the current plans indicate vehicles can safely enter and exit the site and that the proposal would not have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the highway network.
- 5.39 Each property has space to park two vehicles (either as 2 parking spaces or as a garage and single parking space). The minimum parking standard for a 3 bedroom property is for 2 -3 parking spaces and therefore the proposal is considered to adequately meet this standard. The layout provides a shared driveway for each pair of semi-detached houses and also allows for space to manoeuvre the cars for each house within the site so drivers can enter and exit in forward gear. There is space within the layout to provide EV charging points for each property.
- 5.40 The layout shows cycle storage is to be provided in either the garage or for those properties without a garage in a detached storage shed. All properties have a side access gate which would allow cycles to be wheeled around to the rear garden. It is considered that cycle parking can be adequately accommodated within the proposed layout.
- 5.41 In conclusion, the application is considered acceptable in terms of highway safety, with adequate access, parking and turning arrangements. Satisfactory provision is made for cycle parking and the layout can provide for EV charging. The proposal would therefore comply with policies CH3 and INV4 of the Local Plan in this regard.

Sustainability

- 5.42 Policies ENV6, ENV9 and, the Planning and Climate Change SPD are relevant to the application. The applicant has submitted a Sustainability Statement. The CBC Sustainability Officer comments that the statement responds to the objectives of the policy by adopting a fabric performance strategy, gas heating, lower energy lighting and renewable technologies for the development although precisely what is envisaged is unclear. However, the measures required to address policy ENV6 can be secured via a suitably worded condition.
- 5.43 The original Sustainability Statement was submitted before water neutrality became an issue, but it demonstrated the development would achieve the adopted policy target in ENV9 of 110 litres/person/day. The applicants are now proposing to achieve the target of 85 litres/person/day as required by draft policy SDC4 of the emerging Local Plan 2024-2040, this matter is however discussed later in more detail, in the 'water neutrality' section of this report.

Other Ground Conditions (Contamination)

- 5.44 There is linear area of filled ground intersecting the west of the site marked on the Council mapping as 'unknown filled ground'. The CBC contaminated land officer has no comments about this. It is not considered that there are any contamination impacts from the feature which from looking at other

evidence provided by the applicant seems to suggest a former ditch or field boundary feature now lost from the site.

Affordable Housing Provision and Infrastructure Contributions

- 5.45 Local Plan Policy H4 states that 40% affordable housing will be required from all residential developments. The policy accepts that on-site provision may not always be achievable on small developments of 5 dwellings or less and, on this basis, the council will accept an off-site financial contribution. On submission of the application back in 2021, the applicant agreed to payment of a financial contribution which at the time was calculated at £36,587 based on the affordable housing calculator. This rate may have increased slightly, however, it has not been recalculated as, given the officer concerns set out elsewhere in this report, a draft S106 has not been concluded. As there is no completed 106 Agreement for this development at this present time the applicant is not policy compliant and therefore a refusal is recommended on this basis.
- 5.46 Policy IN1 requires developments to make provision for its on and off-site infrastructure needs and confirms that the Council will seek to implement a Community Infrastructure Levy (CIL). The Crawley CIL Charging Schedule has been in effect since 17 August 2016 and is relevant to this application since the development is creating 4 new houses. The charge would be calculated, and a CIL Liability Notice would be issued following the grant of permission.

Water Neutrality

- 5.47 Crawley is situated in an area of serious water stress, as identified by the Environment Agency. The application site is supplied with water by Southern Water from its Sussex North Water Resource Zone (SNWRZ). This supply is sourced from abstraction points in the Arun Valley, which includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site.
- 5.48 On 14 September 2021, the Council received a Position Statement from Natural England. The Natural England position is that it cannot be concluded that the existing abstraction within the SNWRZ is not having an impact on the Arun Valley sites. It advises that developments within this zone must not add to this impact. Under the Conservation of Habitats and Species Regulations 2017, Crawley Borough Council is the Competent Authority and has a duty to consider the impact of development on protected species and habitats. These Regulations and the Natural England Position Statement require, as a matter of law, applications for planning permission in the SNWRZ to demonstrate that they do not increase pressure on water resources and that they are “water neutral.” As a consequence, all applications that may affect water consumption need to be ‘screened’ to identify whether the proposed development, individually or in combination with other projects, will result in a significant effect on the Arun Valley sites.
- 5.49 The applicant has submitted evidence to enable a judgement to be made by the Borough Council, as the competent authority, as to whether there could be any potential significant impacts of the development on the Arun Valley sites, by way of an ‘Appropriate Assessment’. In accordance with the Natural England Position Statement, to meet this test, the development must demonstrate that it is water neutral. The definition of water neutrality is the use of water in the supply area before the development being the same or lower after the development is in place.
- 5.50 The site is undeveloped land and therefore there is no existing water use associated with it. The applicant has prepared a water budget for the proposed houses seeking to ensure that the daily water demand target will be below 85 litres/person/day. This is to be achieved through the use of greywater recycling for the WC’s and 50% washing machine demand, reduced flow rate taps / showers and water efficient kitchen appliances. The assumptions in the report have been reviewed by the Council’s independent specialist consultant that has advised that the proposed water budget (supported by the calculations and the information provided), is acceptable provided further evidence on fittings, details on external taps and the greywater harvesting system are secured by condition or legal agreement.
- 5.51 However, while the water budget information for the development is considered acceptable, the development is not water neutral without mitigation to offset the water needed for the houses. While the applicant states that the water demand would be offset using the Borough Council’s Retrofitting

Strategy, there has been no evidence provided that any agreement has been made to provide mitigation and in the absence of this mitigation the development is not water neutral. As a consequence, an Appropriate Assessment has not been completed and sent to Natural England as there is no certainty that the mitigation can be secured through an offsetting provider and on this basis a planning permission cannot be granted as water neutrality cannot be demonstrated.

- 5.52 In conclusion, the development fails to demonstrate water neutrality in the absence of any firm proposals for off-site mitigation. It must therefore be concluded that the proposed development would adversely affect the integrity of the protected Arun Valley sites which are European Sites of Nature Importance and are protected under the Conservation of Habitats and Species Regulations 2017 (the Regulations). The proposal is therefore contrary to the Regulations, policies IN1 and ENV2 and to draft Local Plan policy SDC4.

CONCLUSIONS:-

- 6.1 It is considered that while land is suitable in principle for redevelopment, the current proposal in terms of its design and layout has a harmful and unacceptable impact due to the loss of a historic tree / hedge boundary. The permanent loss of the established boundary would not preserve or enhance the significance of the heritage assets. The application is therefore contrary to policies SD1, CH12, CH15 of the Local Plan and policy HA7 of the draft Local Plan and the advice in Chapter 16 of the NPPF 2023.
- 6.2 In Arboricultural terms the development would result in the almost total loss of a row of protected trees which make a positive contribution as a group to the visual amenity of the area. The proposed mitigation for the trees involving replanting along a different boundary would provide some visual screen however this is not considered adequate either in numbers or tree positioning as there is considered to be likely future conflict with the maturing replacement trees and pressure for surgery / removal to contain them in garden setting.
- 6.3 The applicant has also been unable to demonstrate the development is water neutral as there are not agreed offsetting mitigation measures in place. The proposal is therefore contrary to the Conservation of Habitats and Species Regulations 2017, Local Plan policies IN1 and ENV2 and to draft Local Plan policy SDC4.
- 6.4 Finally due to the concerns set out above a Section 106 Agreement has not been entered into without which the development cannot secure affordable housing or tree mitigation contributions needed to address the relevant policies H4 and CH6 of the Local Plan.

RECOMMENDATION RE: CR/2021/0571/FUL:-

REFUSE for the following reasons:

1. The proposed development would result in the loss of a historic tree screen marking an established boundary that informs the past use of land and make a positive contribution to the designated heritage assets setting. Its loss would result in less than substantial harm and would not preserve or enhance the significance of the heritage asset, the harm being cumulative with the development of the land parcel and encroachment of urban form when viewing Ewhurst Place from the south. The development is therefore considered to be contrary to policies SD1, CH12 and CH15 of the Local Plan and policy HA7 of the draft Local Plan which should be afforded significant weight along the advice set out in chapter 16 the NPPF 2023
2. The proposed development would result in the loss of an important hedge / tree screen which is considered to make a positive contribution to the visual amenity of the area and for which insufficient mitigation for its loss would be provided. The relationship of the new tree planting would result in the future occupiers experiencing some nuisance from the trees resulting in pressure to prune or fell them in order retain them at a manageable size with the rear gardens which would have an adverse impact on their visual amenity and the effectiveness of the boundary screen. The proposal is contrary to Policies CH2 and CH3 of the Crawley Borough Local Plan 2015-2030, the Green Infrastructure Supplementary Planning Document and the relevant paragraphs of the National Planning Policy Framework (2023).

3. No agreement is in place to ensure that the appropriate affordable housing and tree mitigation contributions required to support the development are secured. The proposed development is therefore contrary to policies CH6 and H4 of the Crawley Borough Local Plan 2015-2030, the Green Infrastructure SPD, the Affordable Housing SPD and the Developer Contributions Guidance Note.
4. The applicant has failed to demonstrate that there is effective mitigation in place to secure the water offsetting that is required to serve the new houses and secure the measures required to achieve water neutrality. The proposal is contrary to policies IN1, ENV2 of the Crawley Borough Local Plan 2015-2030 and policy SDC4 of the draft Local Plan 2024-2040, and fails to address the Natural England Position Statement on water neutrality received on 14 September 2021 that requires development does not cause an adverse impact upon protected habitats in the Arun Valley, including the Amberley Wild Brooks Site of Special Scientific Interest (SSSI), the Pulborough Brooks SSSI and the Arun Valley Special Protection Area/Special Area of Conservation and Ramsar sites, in breach of the Conservation of Species and Habitats Regulations 2017.

NPPF Statement

In determining this planning application, the Local Planning Authority assessed the proposal against all material considerations and has worked with the applicant in a positive and proactive manner based on seeking solutions where possible and required, by:

- Seeking amended plans/additional information to address identified issues during the course of the application.
- Providing advice on the refusal of the application to solutions that would provide a satisfactory way forward in any subsequently submitted application.

This decision has been taken in accordance with the requirement in the National Planning Policy Framework, as set out in article 35, of the Town and Country Planning (Development Management Procedure) Order 2015.



ArcGIS Web Map



Crawley Borough Council
Town Hall, The Boulevard,
Crawley, West Sussex,
RH10 1UZ
Tel: 01293 438000

1:1,854

