



Crawley 2035

<p>Ref No:</p> <p><i>Office use only</i></p>
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Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council by 5pm on 2 March 2020.

Representations can be made via this form and emailed to forward.planning@crawley.gov.uk or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client's name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at www.crawley.gov.uk/privacy. Specific reference to the Local Plan and planning policy related public consultation can be found on: www.crawley.gov.uk/pw/web/PUB351893

PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple "PART B" sections with a single "PART A" completed.

PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

	1. Personal details	2. Agent's details
Title:	Mr	
First name:	Kevin	
Surname:	Owen	
Organisation:	Arun District Council	
Address line 1:	Arun Civic Centre	

Address line 2:	Maltravers Road	
Town/city:	Littlehampton	
Postcode:	BN17 5LF	
Telephone:	01903737853	
Email:	kevin.owen@arun.gov.uk	

PART B – Your representation

3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

4. Which part of the Local Plan does this representation relate to?

Paragraph:		Policy:		Other:	Duty to cooperate
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5. Do you consider the Local Plan to be: (Please tick)

- | | | | | |
|---|-----|-------------------------------------|----|--------------------------|
| 5.1. Legally compliant? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| 5.2. Sound? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

Arun District Council's response is in the form of a Report to the Planning Policy Sub-Committee which met on 25 February and agreed the recommendations of the report - which is attached. This response does not make an objection to the Local Plan under the Duty to Cooperate but that this position is conditional on the recommendations of the Council's response set out in the report, being addressed satisfactorily.

If required, please continue your response on an additional piece of paper and securely attach it to this response

7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-

compliance with the duty to co-operate is incapable of modification at examination.

Before the plan is submitted, there needs to be up to date evidence via signed Statements of Common Ground with neighbouring authorities within the North West Sussex Housing Market Area (WSHMA) on how any residual unmet housing need is to be accommodated. Similarly, a Statement of Common Ground needs to be agreed with Arun District Council given that there is a formal request from Crawley Borough Council for authorities outside of the WSHMA to consider whether assistance can be provided on a level of unmet housing need.

If required, please continue your response on an additional piece of paper and securely attach it to this response

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/crawley2035

Signature

Mr. Kevin Owen completed online

Date

26/02/2020

AGENDA ITEM NO.

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 25 FEBRUARY 2020

PART A : REPORT

SUBJECT: Crawley Regulation 19 Publication Local Plan Consultation

REPORT AUTHOR: Kevin Owen, Planning Policy Team Leader

DATE: 3 February 2020

EXTN: x 37853

PORTFOLIO AREA: Planning

EXECUTIVE SUMMARY:

The Crawley Regulation 19 publication Local Plan is being consulted on for soundness which covers the 15-year plan period 2019 - 2035. The consultation – closes on 2 March 2020. This report briefs members on the proposed response.

RECOMMENDATIONS:

That Planning Policy Sub Committee agrees that:-

- 1) In response to the Crawley Local Plan Regulation 19 consultation, Crawley Borough Council is urged to clearly set out in updated Statements of Common Ground with neighbouring authorities within its Housing Market Area, how its unmet need is to be resolved before the plan is submitted for examination; and
- 2) In the absence of progress on the LSS3 update, a Statement of Common Ground is agreed specifically with Arun District Council to clarify that no assistance will be required in order to help with the level of unmet need arising from the Borough.

PROPOSAL(S):

1.1 The Crawley Reg 19 Publication Local Plan (CLP) is being consulted on for soundness. The consultation closes on 2 March 2020. The CLP is housing supply 'constrained' and consequently only sets out provision as follows:-

Plan period	2020-25	2025-30	2030-35	2020-2035
Housing Provision	+2,500	+2,250	+605	+5,335
OAN Requirement				11,280
Shortfall				-5,945

1.2 The planned housing provision of 11,280 dwellings over 15 years 2020-2035 will mean that there is a residual shortfall of -5,945 dwellings compared to the OAN requirement based on the Governments' Standard Housing Methodology (SHM).

1.3 The CLP suggests that the residual unmet need should be accommodated in neighbouring authorities falling within the North West Sussex Housing Market Area (NWSHMA), specifically Horsham and Mid Sussex, through the Duty to Cooperate by negotiating provision in respective local plans (e.g. the potential for urban extensions around Crawley). It is also acknowledged that the Government's SHM has increased housing figures for these authorities so that this is now also becoming more difficult: -

12.27 "...Currently, the adopted Local Plans for Horsham and Mid Sussex districts are anticipated to provide an additional 3,150 dwellings, above their objectively assessed housing needs, in order to meet Crawley's unmet need. However, through the Local Plan Reviews this figure is likely to change, particularly as the Standard Method increases their own housing requirements to above their current adopted Plan commitments (see paragraph 2.28)"

1.4 In context, the issue of an existing level of unmet housing need identified across the West Sussex and Greater Brighton Area, adds to the urgency to achieve progress on the update to the Local Strategic Statement (i.e. LSS3). This progress is needed to inform the 'Duty to Cooperate'. For example, on 27 January 2020 Elmbridge Borough Council (in Surrey) wrote to Arun District Council (ADC) and other authorities seeking assistance with unmet housing need (of circa 4,000 dwellings), under the 'Duty to Cooperate'.

1.5 While ADC is remote from and does not have direct cross boundary/strategic issues with Crawley Borough (or indeed Elmbridge Borough), until Crawley's unmet need is resolved by neighbouring districts, there may be consequent implications for the Arun local planning authority area.

1.6 Currently – there appears to be no up to date evidence on Crawley Borough's web site in support of the CLP with regard to the 'Duty to Cooperate' and 'Statements of Common Ground' or 'Memoranda of Understanding', addressing how unmet need is to be accommodated through adjacent local plans or via the LSS3 process.

1.7 It is understood that Horsham District's draft Local Plan (2019-2036) will undergo a Regulation 18 consultation 17 February – 30 March. Amongst other options, that draft Local Plan will include a potential urban extension of circa 10,000 dwellings on a site at Ifield adjacent to Crawley urban area. This would offer a significant potential contribution towards Crawley's unmet housing need. Crawley Borough Council is therefore, urged to set out in Statements of Common Ground with neighbouring authorities within its Housing Market Area, how its unmet need is to be resolved before the plan is submitted for examination.

1.8 It must be stressed that Crawley Borough Council has not asked ADC to assist with any unmet housing need given the CLP seeks assistance from Horsham and Mid Sussex and other authorities within the NWSHMA. However, given the wider unmet need outlined above, and risks should there be insufficient progress on LSS3, ADC

should seek a specific Statement of Common Ground with Crawley Borough consolidating this position.

3. OPTIONS:

The following options are available to Members:

- To agree the report to ensure that effective local plans are examined and put in place which can clearly address unmet housing need sustainably, close to where it arises through appropriate infrastructure under the 'Duty to Cooperate';
- or not to agree the report and the risk that unmet housing need in the wider West Sussex and Greater Brighton Area is not resolved which could have potential implications for ADC under the 'Duty to Cooperate'.

4. CONSULTATION:

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		x
Relevant District Ward Councillors	x	
Other groups/persons (please specify):		x
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial		x
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability		x
Asset Management/Property/Land		x
Technology		x
Other (please explain)		

6. IMPLICATIONS:

There are no immediate implications for Arun District arising from this proposed response.

7. REASON FOR THE DECISION: To ensure that Arun is fulfilling its obligations under the Duty to Cooperate'.

8. EFFECTIVE DATE OF THE DECISION: *Committee Services to insert*

9. BACKGROUND PAPERS:

1. Crawley Submission Local Plan - Regulation 19 Consultation – 20 January 2020 to 2 March 2020: www.crawley.gov.uk/crawley2035