



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:	Matt	
Surname:	Bates	
Organisation:	Horsham District Council	
Address line 1:	Parkside	

Address line 2:	Chart Way	
Town/city:	Horsham, West Sussex	
Postcode:	RH12 1RL	
Telephone:	07780956767 01403215346	
Email:	strategic.planning@horsham.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:	Strategic Policy SD3	Other:	
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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 type="checkbox"/> | No | <input checked="" 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.

We support this policy in principle, but consider its effectiveness could be improved. It is recognised the AAP will provide opportunities to increase housing and employment provision within Crawley Borough, and this should feed into an assumption that the unmet need will be reduced (see further comments on Policy HP1 in particular).

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.

Request that specific reference is made to fact that the safeguarded land extends into Horsham district, therefore close joint working will be needed to ensure a consistent approach between the AAP and Horsham LP policy on Gatwick safeguarding going forward.

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:

Horsham District Council is a key Duty to Cooperate partner.

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. Matt Bates completed online

Date

02/03/2020

Planning Policy
Crawley Borough Council, Town Hall
The Boulevard
Crawley
RH10 1UZ
Sent by email to forward.plans@crawley.gov.uk

Our ref: Crawley LP2020-
2035/Reg 19

Your ref:

Date: 02 March 2020

Dear Sir/Madam,

**Re: Draft Crawley Borough Local Plan 2020-2035 (January 2020) – Submission
Publication Consultation**

Thank you for consulting us on the Draft Crawley Borough Local Plan 2020 -2035. We are grateful for the opportunity to be able to comment on your emerging plan. Horsham District Council recognises that your authority faces considerable challenges in ensuring it can meet the future needs of Crawley within what is a tightly bound administrative area. Overall we consider that the plan has positively sought to balance the provision of those future needs with other wider objectives in a manner that contributes to achieving sustainable development.

I would also take the opportunity to reaffirm Horsham District Council's commitment to continued close cooperation and joint working between our councils, reflecting our joint housing market area and common functional economic market area.

We do have a number of detailed comments on the draft document, which follow and build on comments made in our letter dated 16 September 2019 responding to the earlier Regulation 18 consultation on the Crawley Borough Local Plan 2020-2035. We will provide these separately using comment forms for your ease of reference and inputting, but I have nonetheless set these out together in this letter – the comments that follow are identical word-for-word to the comment forms.

Strategy Policy SD3: North Crawley Area Action Plan

We support this policy in principle, but **consider its effectiveness could be improved**. It is recognised the AAP will provide opportunities to increase housing and employment provision within Crawley Borough, and this should feed into an assumption that the unmet need will be reduced (see further comments on Policy HP1 in particular).

Change sought: Request that specific reference is made to fact that the safeguarded land extends into Horsham district, therefore close joint working will be needed to ensure a consistent approach between the AAP and Horsham LP policy on Gatwick safeguarding going forward.

Strategic Policy CL4: Effective Use of Land: Sustainability, Movement and Layout

We support this policy in principle, but **consider its effectiveness could be improved**.

Change sought: Request clearer cross reference to Policy CL4 which specifies minimum densities.

Strategic Policy CL5: Form of New Development – Layout, Scale and Appearance

We support this policy in principle, but **consider it is not justified as stands** and that **its effectiveness could be improved**.

We welcome that the policy sets out minimum densities that are higher than previously used. This is an important means of ensuring no stone is unturned in seeking to maximise meeting identified housing needs in Crawley. However it is not clear what the evidence is for selecting these specific density ranges. This should be made fully transparent to ensure that the policy is justified.

It is also not clear from this policy exactly where these densities would apply: although examples are given, this does not provide sufficient certainty. Therefore the policy is not fully effective.

Change sought: It is considered necessary to prepare a densification study to consider, amongst other things, appropriate densities. This should include a spatial analysis of what is appropriate, or transparently present the evidence already gathered to evidence this.

Strategic Policy CL7: Important and Valued Views

We support this policy in principle, but **consider that its effectiveness could be improved**.

The long distance view splays shown are extensive and cover a significant proportion of Crawley. It is important that well-designed higher-density proposals are not stymied by Policy CL7, given the significant unmet development needs and the importance of leaving no stone unturned in meeting this need.

Change sought: Request that the policy includes clarification text to make clear that appropriately-designed higher density development will still be appropriate in the important and valued views areas, subject to the provisions of this policy.

Strategic Policy DD1: Normal Requirements of All New Development

We **support** this policy which is clear in its encouragement of efficient use of land as part of good design.

Strategic Policy OS1: Open Space, Sport and Recreation

We support this policy in principle, but **consider that its effectiveness could be improved**.

If an area of open space is surplus to requirements, it presents an opportunity to re-use the site for housing and could potentially include new public recreation space. This in turn helps reduce the unmet development needs.

Change sought: Request that Policy OS1 is worded more positively to more explicitly acknowledge the opportunities presented by surplus open space to support meeting housing need whilst improving recreational opportunities, and to better reflect Policy H3f.

Strategic Policy EC1: Sustainable Economic Growth

We support this policy in principle, but **consider that its effectiveness could be improved**.

We note the predicted shortfall in employment land supply and have also noted the request recently made by Crawley Borough Council as part of the Duty to Cooperate for Horsham District to assist in meeting this need.

Horsham District is seeking to significantly increase the number of high quality jobs in the District to ensure that the employment needs of significant housing growth needed in the District is met and provides choice for residents to live and work locally. There is a clear synergy between this and providing for the needs of Crawley. As you will be aware land to the West of Crawley, but is within Horsham District is being promoted for development. Whilst no decision has been made as to whether it would be appropriate to allocate this site, we would expect any strategic housing development in Horsham District to include significant levels of employment of a type that is attractive to new residents of that development, on a '1 job per household' basis, to increase the sustainability of the new community and reduce the need to travel.

It is therefore important that the joint working outlined in Strategic Policy EC1(v) leads to new employment that primarily meets the need of the new communities born of any strategic development.

Change sought: It is requested that Policy EC1 has text added to clarify that any employment development provided as part of strategic sites 'at' Crawley, but outside its boundaries, is planned to meet the needs of the Crawley/Gatwick FEMA first and foremost, and provide local jobs.

Paragraph 9.23 (Strategic Policy EC1: Sustainable Economic Growth)

The **effectiveness** of Policy EC1 could be further improved by making the change set out below.

Change sought: Amend text to clarify that whilst the scope for strategic employment growth will be investigated as part of a North Crawley AAP, the priority will be to accommodate additional housing within Crawley borough, insofar as is commensurate with other local plan policies.

Strategic Policy TC3: Development Sites within the Town Centre Boundary

We support this policy in principle, but **consider it is not justified as stands** and that **its effectiveness could be improved**. It is considered that there may be further opportunities for mixed-use proposals which enhance the town centre to include a greater element of residential development, which can contribute to reducing the unmet need. This should be reflected in the policy.

This view has been formed on the premise that there has not been evidence presented alongside the draft Local Plan to quantify opportunities to provide further residential units, of a higher-density nature, to complement and support the vitality of the town centre.

Change sought: It is considered necessary to prepare a densification study. This should include detailed analysis of redevelopment and regeneration opportunities in the town centre area, in a way that maximises opportunities to address the unmet housing need. This may lead to an increase to the 1,500 net dwellings increase set out in Policy TC3(iv).

Strategic Policy H1: Housing Provision

We support aspects of this policy, in particular that all reasonable opportunities will be considered to develop on brownfield sites and surplus green space; capitalise on town centre living, and seek out further opportunities on the edge of Crawley.

However we consider that the policy **is not justified as stands, its effectiveness could be improved**, and needs further work to demonstrate that it is **positively prepared**.

Firstly, we do not consider that the remaining unmet need figure of 5,925 dwellings total has been fully justified. Whilst acknowledging that land supply in Crawley is highly constrained, evidence has not been provided that all opportunities for providing further housing within Crawley's boundary have been exhausted. For example, Policy CL5 sets minimum densities for development, and Policy TC3 identifies a number of Key Opportunity Sites in the Town Centre. Paragraph 11.19 states that at least 1,500 dwellings are anticipated across all of these sites (consistent with Policy H1). Currently, we do not consider that there is clear evidence of how this number has been arrived at, or whether a comprehensive study of opportunity sites within the town centre, and appropriate densities within these, has been undertaken.

Secondly, it is also not clear how opportunities for estate regeneration (and associated densification) have been looked at. The draft Local Plan in paragraph 12.55 states that there are no estate regeneration projects planned in Crawley. We would welcome discussion as to why this has not been taken forward as an option for increasing housing delivery within Crawley Borough whilst also delivering significant community benefits.

Thirdly, we note that the Strategic Housing Land Availability Assessment (SHLAA) supporting the emerging Local Plan makes an assumption that the Gatwick southern runway may still come forward, and incorporates an assumption that maximum permissible noise levels may therefore be exceeded. Whilst we recognise that this situation is complex, this change appears to have had the effect of ruling out large sites of several hectares which had previously been included in the housing trajectory for the 2015 Local Plan. The SHLAA recognises that such sites may be reconsidered as part of the North Crawley Area Action Plan. It is however considered that in advance of such a review, it is not necessarily appropriate to fully rule out sites at this stage, particularly when given the increase in housing need for Crawley and for the housing market area. Again, we would welcome further discussion around these points.

It is suggested that further areas of investigation regarding land use efficiency and maximising delivery within Crawley Borough could reasonably include:

- i. Consideration as to whether a more generous assumption relating to windfall development (currently assumed at 55 dwellings per hectare) may be appropriate. It is noted that the draft Local Plan refers on page 223 to a background document 'Windfall Allowance Review 2020-2035.' However we have not been able to find this document on your website.
- ii. Positive identification at the plan-making stage of any further surplus or under-used green space or industrial land in Crawley Borough. The need to protect and enhance fit-for-purpose green infrastructure is supported, but it is noted that currently published open space studies are some 6 years old and may now be in need of update;
- iii. Reassess whether sites in the SHLAA should have been found to be unsuitable for development. The airport noise contour issue has already been mentioned above, and there are further justifications given for rejecting sites that could be better evidenced, e.g. site adjacent (but not within) a flood risk area, or the higher infrastructure costs associated with redeveloping industrial sites.

To ensure that a robust unmet need figure can be agreed, and the points above are considered further, it is requested that a comprehensive densification study is undertaken, to consider these points and others as appropriate. This is essential to ensure a robust understanding of how much of the Crawley housing needs will remain unmet, and therefore form the basis of the discussions over the extent to which Horsham District Council can meet this need.

We also request an alternative trajectory and target which reflects the likely scenario of some or all of the Gatwick Expansion safeguarding being removed as a result of the forthcoming AAP. This will assist in Duty to Cooperate discussions, and may be critical to the unmet need housing

figure should the Gatwick safeguarding policy be removed entirely in the course of the examination.

Change sought:

- To be effective, and meet the test of positive planning, the policy should additionally refer to opportunities arising from increased densities including increasing building heights and fully exploiting surplus garden land, and estate regeneration.
- To ensure that a robust unmet need figure can be agreed, it is requested that a comprehensive densification study is undertaken, to consider points i, ii and iii above, and others as appropriate. This is essential to ensure a robust understanding of how much of the Crawley housing need should in principle be accommodated by neighbouring authorities including Horsham district.
- It is requested that an alternative trajectory and target which reflects the likely scenario of some or all of the Gatwick Expansion safeguarding being removed as a result of the forthcoming AAP.

Strategic Policy H2: Key Housing Sites

We support this policy in principle, but **consider it is not justified as stands**. As set out in our comments to earlier policies (and in particular Policy H1), there is insufficient evidence to support the overall number of dwellings suggested, given that further sites could be allocated if further investigations through a densification study were made.

Change sought: It is considered necessary to prepare a densification study. This should include analysis of whether assumptions built into policies as drafted, for example on town centre redevelopment opportunities, surplus green spaces, and estate regeneration should be different and if so, whether this could yield significant further housing capacity in Crawley

It is also requested that reference is made to the alternative scenario of Langley Green and Forge Wood sites coming forward as a result of Gatwick safeguarding being removed (as stated in 12.28), with associated housing capacities and an alternative trajectory and unmet need figure.

Strategic Policy H3a: Estate Regeneration

We support this policy in principle, but **consider it is not justified as stands** and that **its effectiveness could be improved**.

Given the pressing need for housing in the area and unmet housing need, it is considered imperative that estate regeneration opportunities are explored as this is a potential source of additional housing supply that is, to a great extent, within the control of CBC. This could form part of a densification study, and is necessary to ensure that no stone is left unturned. Such a study may identify further broad areas for development to yield additional housing in the later years of the Plan period.

Change sought: It is considered necessary to prepare a densification study. This should include analysis of whether and estate regeneration could play a part in providing additional housing within Crawley's administrative boundaries.

Strategic Policy H3b: Densification, Infill Opportunities and Small Sites

We **support** this policy which is clear in its encouragement of efficient use of land in a number of ways.

Strategic Policy H3c: Town Centre Sites

We **support** this policy. It is considered that there may be further opportunities for the town centre area and mixed use developments to provide more housing to help meet the unmet need in Crawley, as set out in our comments to Policies H1 and H2.

Strategic Policy H3d: Upward Extensions

We **support** this policy which encourages efficient use of land through building upwards.

Strategic Policy H3f: Open Spaces

We **support** this policy which strikes an appropriate balance between protecting and enhancing valued open spaced whilst taking a pragmatic approach to allowing some housing development in certain circumstances.

Paragraph 12.72 (Strategic Policy H3g: Urban Extensions)

We welcome paragraph 12.72 and the fact it has now been moved to before the policy (as suggested in our response to your Regulation 18 consultation).

Strategic Policy H3g: Urban Extensions

Policy H3g part ix is **not effective**. Including reference to potential nomination rights for affordable housing to potentially be provided outside of Crawley borough is premature and therefore ineffective, given no such agreement in principle has been reached. This bears in mind that Horsham District itself has a high assessed need for affordable housing (503 homes per year) meaning that there may be limited opportunity to meet a significant proportion of Crawley's affordable housing need on top.

Change sought: Request removal and similarly as a consequential change to the reasoned justification (see further comment on paragraph 12.76).

Paragraph 12.76 (Strategic Policy H3g: Urban Extensions)

Paragraph 12.76 is **not effective** as drafted – it currently states:

“Whilst located within Mid Sussex or Horsham Districts, any urban extension on the edge of Crawley should be meeting the unmet housing needs arising from Crawley, and should therefore meet Crawley's specific needs for affordable housing, housing mix, type, and tenure.”

It is premature to make this statement ahead of any agreement being reached as part of future joint work. HDC wishes to make clear that new development in Horsham district will address the needs of Horsham district in the first instance, as required by NPPF paragraph 35(a) in respect of the minimum requirement for a local plan to pass the 'positively prepared' test.

Change sought: Request removal of this sentence.

Strategic Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road

We **support** this policy subject to the following comment:

The corridor for any future relief road will need to be agreed jointly with HDC as most of the route would be within the administrative area of Horsham. Any area of safeguarding should not prejudice this. It is noted that this is recognised in the supporting text.

I do hope these comments are helpful. I would like to emphasise that they are made in anticipation of further constructive dialogue between our authorities, and with an expectation that areas of disagreement can be readily addressed, and quite possibly eliminated.

Officers will be in touch further to arrange further discussions around this point and in respect of the Statement of Common Ground currently being worked upon.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Vickers', with a horizontal line underneath.

Councillor Claire Vickers
Cabinet Member for Planning and Development