



<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:	Mamun		
Surname:	Madaser		
Organisation:	Habinteg		
Address line 1:	Holyer House		

Address line 2:	20 -21 Red Lion Court	
Town/city:	London	
Postcode:	EC4A 3EB	
Telephone:	0207 822 8706	
Email:	mmadaser@habinteg.org.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:

5. Do you consider the Local Plan to be: (Please tick)

- | | | |
|---|---|-----------------------------|
| 5.1. Legally compliant? | Yes <input 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 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.

Habinteg has 50 years' experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response therefore focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Crawley.

Habinteg strongly supports the approach to accessible and adaptable homes. The specific mention in Policy DD2 that "All new dwellings must be capable of adapting to the changing needs of residents through the application of building regulation Part M Category 2 – accessible and adaptable dwellings" is significant and welcome in helping to ensure that access and inclusion is prioritised in Crawley.

This emphasises for us that alongside an increased supply of accessible and adaptable homes it is critical that an adequate number of homes are built to Category M4(3) wheelchair

user dwelling standard. Habinteg's *Forecast for Accessible Homes* also found that just 1% of homes outside London are set to be built to wheelchair dwelling standards between 2019 and 2030. With the lack of wheelchair user homes across the country it is essential that a proportion of all new homes built are delivered to that standard.

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.**

Policy DD2 says "In exceptional circumstances, flexibility may be applied in the application of this policy requirement for: a. specific small scale infill developments; b. flats above existing shops or garages; c. stacked maisonettes where the potential for decked access to lifts is restricted.". We believe the language should be firmer where developers would be asked to prove why the standard can't be met, with this being something that is argued out at the planning permission stage.

We do not underestimate the positive benefits of making a commitment to inclusive design. We know that the provision of a suitably accessible home in a welcoming and inclusively designed neighbourhood can transform the lives of people who are so often left to 'make do' in unsuitable accommodation.

Our tenants have told us that having their need for accessible homes met can have wide ranging positive impacts, from the ability to access their children's rooms to read a bedtime

story, to the ability to cook a family meal, and to come and go as they wish to visit family and friends. We also know that disabled people who have their needs for accessible homes met are four times more likely to be in work than those who don't. From a public services perspective accessible housing can help make hospital discharge faster, can help minimise expenditure residential care settings and can make reduce demand from domiciliary care.

According to the NHS there are 1.2 million wheelchair users in the UK nationally making up 2% of the UK population. Crawley according paragraph 2.20 has a population of 111,700 2,334 (2%) could be wheelchair users.

We would like to see Crawley set a similar requirement for wheelchair user dwellings as that set down in the London Plan which requires that, 10% of new homes comply with Part M4 (3) Standard (the other 90% required to be built to part M4 (2) accessible and adaptable standard). Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4(3) homes should be considered as a starting point for all local plans.

*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

Mamun Madaser

Date

03/3/2020