



Crawley 2035

Ref No: <i>Office use only</i>
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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:	<input type="text"/>	Mr	<input type="text"/>
First name:	<input type="text"/>	Oliver	<input type="text"/>
Surname:	<input type="text"/>	Milne	<input type="text"/>
Organisation:	Bellway Homes Ltd	Savills	<input type="text"/>
Address line 1:	<input type="text"/>	33 Margaret Street	<input type="text"/>

Address line 2:	<input type="text"/>	<input type="text"/>
Town/city:	<input type="text"/>	London
Postcode:	<input type="text"/>	W1G 0JD
Telephone:	<input type="text"/>	+44 (0) 20 7299 3074
Email:	<input type="text"/>	OMilne@savills.com

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 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.

Please see attached letter.

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.**

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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:

Land interest in subject site.

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

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Policy:

EC2

Other:

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No

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Signature



Date

02.03.2020

2 March 2020



Strategic Planning
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Council
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Crawley
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Dear Sir / Madam

**Representations to Crawley's Local Plan Review Regulation 19 Consultation
Former TSB Site, Russell Way, Crawley**

Thank you for providing us with the opportunity to engage with the Regulation 19 consultation on the Council's Local Plan Review. I write on behalf of our client, Bellway Homes Limited (South London), who has an interest in the above site.

Below, I set out a brief summary of the context of the site before turning to specific comments on the consultation document.

Context

The site is located off Russell Way within the Three Rivers area of Crawley. The site measures approximately 0.32 hectares in size and is currently a cleared, vacant site. Within the current Local Plan the site is allocated as a key housing site.

Bellway has recently submitted a planning application at the site for the following development:

"Erection of L Shaped 4 storey building comprising 59 x flats with associated landscaping, refuse and cycle storage, infrastructure works and parking court at the rear." (LPA Ref. CR/2020/0037/FUL).

This application follows pre-application discussion with planning and design officers at CDC, and highways officers at WSCC. These discussions have informed the layout and design of the scheme which have evolved and developed in response to the comments and feedback provided.

It's also worth noting that on 16th September 2019 Bellway submitted representations to the Crawley Local Plan Review Regulation 18 Consultation. As part of these representations Bellway commented on a number of draft polices, including Policy H2, Policy EC2, Policy H4, Policy H5 and Policy ST2.

This letter is drafted in the context of Bellway's previous representations to the Council on its Local Plan Review, and in the context of its planning application at the site.

Comments on the Consultation Document

Strategic Policy H2: Key Housing Sites

Within the Regulation 19 document we note that the Council is still proposing to retain the key housing allocation at the site. This is strongly supported. However, we note that the Council has increased the indicative capacity



from 40 dwellings within the Regulation 18 document to 90 dwellings within the Regulation 19 document. Whilst this increase is supported in principle, 90 dwellings is considered too high. The proposed development pursuant to planning application CR/2020/037/FUL at the site followed a detailed analysis of the site and the surrounding area. A design-led approach was adopted from an early stage to ensure that the scheme positively responded to the existing and emerging character of the area and was commercially viable.

The resulting proposals include a four storey building comprising 59 residential dwellings. Whilst the layout, height and massing of the building, and the resulting residential density, is considered wholly appropriate given the site specific circumstances, a viability appraisal has been submitted with the application as the proposed provision of affordable housing is not policy compliant due to issues with viability arising from the development.

We are concerned that a development of 90 dwellings would completely redefine the configuration of the development from that proposed by the current planning application, for example with regards to the form of construction and how car parking is accommodated. As such, we believe the viability of delivering 90 units on this site would need to be demonstrated.

Given the above, it is respectfully requested that the indicative capacity for the Former TSB Site be amended to allow for a range of dwellings to be delivered at this site of between 60-90 units within the next version of the Local Plan. This will ensure that the current application remains policy compliant with regards to unit numbers, whilst not precluding the provision of additional units from this site should circumstances facilitate this.

Strategic Policy EC2: Economic Growth in Main Employment Areas

Within the Regulation 19 document we note that the Three Bridges Corridor Main Employment Area has been amended to exclude the site. This is strongly supported and will ensure that there are no policy conflicts within the new Local Plan and help to facilitate the delivery of housing on the site.

Strategic Policy H4: Future Housing Mix

Within the Regulation 19 document we note that the Council has amended Policy H4 to say that the starting point for market housing mix is the recommended mix. The Council has also introduced a new Housing Mix Test to the policy to try and avoid an excessive distorted dwelling mix. However, we note that the recommended mix remains unchanged and separates out market (owner occupier and private rent) and affordable dwellings. We think that the supporting text needs to be made clearer in setting out that this is a strategic recommended mix for the whole borough and should not be applied rigidly to individual development proposals. Such a rigid approach could potentially hamper the delivery of much needed housing within the Borough.

Strategic Policy H5: Affordable Housing

Within the Regulation 19 document we note that the Council has not carried forward the policy requirement for 10% low cost housing in addition to the requirement for 40% affordable housing (subject to viability). This is still supported. The provision of such housing is largely governed by national initiatives which are inherently open to change. A specific policy requirement for low cost housing risks jeopardising the provision of affordable housing if such initiatives change.

We also note that within the Regulation 19 document Policy H5 now states that:

“The council will only consider relaxing this affordable housing requirement, in part or in full, in exceptional circumstances, where a scheme is clearly subject to abnormal costs, not including costs paid for the land, and not otherwise envisaged by the Local Plan Viability Assessment, and where this is evidenced by robustly assessed viability. The scheme must also evidence that it addresses a demonstrative immediate need. In such situations, the scheme is expected to appraise various permutations of affordable housing provisions, and where concessions are agreed by the council then claw-back mechanisms will be expected to be put in place and the scheme independently assessed on an open-book basis.”



Based on the above it would seem that 'exceptional circumstances' only includes abnormal costs. However, there are a number of other factors which can impact the viability of a scheme and the provision of affordable housing. These included (but are not limited to) land value, developer return, sale values and rental values. It is respectfully requires that allowance for other factors is included within the next version of the Local Plan Review.

Strategic Policy ST2: Car and Cycle Parking Standards

Within the Regulation 19 document we note that the Council is still proposing to retain its own car parking standards (which are currently contained within the Parking Standards Annex to the Urban Design SPD – October 2016). This is despite West Sussex Country Council (as the highway authority for the area) having adopted different car parking standards. This often leads to conflicting advice on development proposals and uncertainty for applicants. It is considered that Crawley Borough Council should align its car parking standards with West Sussex.

Future Participation

I trust that the above is of assistance in the preparation of the new Local Plan. I would be grateful for confirmation of receipt of these representations and would welcome the opportunity to engage with further versions of the new Local Plan in the future. If you have any queries or would like to discuss, please don't hesitate to get in contact with me.

Yours faithfully

Oliver Milne
Associate

Enc. As above

cc. James McConnell, Bellway Homes (South London)
Geoff Blake, Bellway Homes (South London)