



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:	Mrs	
First name:	Jane	
Surname:	Smith	
Organisation:	Mole Valley District Council	
Address line 1:	Pippbrook	

Address line 2:	Reigate Road	
Town/city:	Dorking	
Postcode:	RH4 1SJ	
Telephone:	01306 885001	
Email:	Planning.policy@molevalley.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:	Housing, Employment and the proposed AAP for Land North of Crawley
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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 type="checkbox"/> | No | <input checked="" type="checkbox"/> |

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

One of the tests for soundness set out in Paragraph 35 of the NPPF 2019 is that plans should be 'positively prepared' in so that the plan provides a strategy which as a minimum seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

The Crawley submission Local Plan does not plan to meet Crawley's local development needs with a total unmet housing need of 5,925 dwellings and unmet employment need of at least 21ha of employment land. At present there is a lack of clarity as to how these unmet needs will

be accommodated.

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.**

As indicated in MVDC's responses to the Crawley Local Plan consultation and 'duty to cooperate' letter dated 2 March, CBC should consider bringing forward preparation of the AAP for Land North of Crawley to understand the level of development needs that can be accommodated within the AAP boundary.

MVDC would consider the Crawley submission Local Plan to be sound subject to agreeing a Statement of Common Ground that addressed the issues set out in the MVDC's responses to the Crawley submission Local Plan consultation and 'duty to cooperate' letter.

*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:**

If the issues set out in MVDC's responses to the Crawley submission Local Plan consultation and 'duty to cooperate' letter are not addressed, then MVDC may wish appear at the examination hearings.

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

Jane Smith

Date

11 March 2020

Strategic Planning
Crawley Borough Council
Town Hall
The Boulevard
Crawley
West Sussex
RH10 1UZ

If telephoning please ask for: Jane Smith
01306 879120

Email: planning.policy@molevalley.gov.uk

By email: forward.plans@crawley.gov.uk

2 March 2020

Crawley Borough Council's Submission draft Local Plan (2020-2035) - Regulation 19 consultation

Dear Sir/Madam

Thank you for consulting Mole Valley District Council (MVDC) on Crawley Borough Council's (CBC) Submission draft Local Plan.

The strategic issues we wish to comment on are:

- Meeting housing needs
- Economic growth
- Gatwick Airport

Meeting housing needs

As set out in our earlier response to CBC (dated 30.08.2019) as part of the Regulation 18 consultation, MVDC does recognise the difficulties in delivering sustainable growth and the challenge of balancing competing environmental, social and economic pressures. We also recognise the physically constrained nature of Crawley. Nonetheless, MVDC are concerned that CBC will have an updated unmet need of approximately 5,925 dwellings over the Plan Period (2020-2035), which has reduced from an unmet need of approximately 6,475 dwellings at the Regulation 18 stage.

Three quarters of Mole Valley is within the Metropolitan Green Belt and is therefore heavily constrained. That includes all of the land adjacent to Crawley. In addition, further constraints include the Area of Outstanding Natural Beauty, a Special Area of Conservation, areas prone to flooding and other environmental constraints. MVDC recently commenced a 7 week public consultation on the draft version of the Future Mole Valley Local Plan (Regulation 18) and based on current assessments it is clear that MVDC cannot meet its own housing need on brownfield land and/or within the districts existing built-up areas. At this stage, MVDC has not identified any opportunities for part of Mole Valley's housing need to be met by neighbouring local planning authorities.

Therefore, having fully explored all other reasonable options for meeting the district's housing need, exceptional circumstances may exist for MVDC to consider some degree of change to Green Belt boundaries. This is one of the principles which is being considered through MVDC's current Regulation 18 consultation.

On a further point, Crawley is a functional component of the Northern West Sussex Housing Market Area (NWS HMA), which includes Horsham, Mid Sussex and a small part of the Reigate and Banstead Council areas. Mole Valley does not form part of the same housing market area.

On this basis, we do not consider that MVDC should be expected to meet any of CBC's unmet housing need. A separate letter setting out MVDC's position under the Duty to Cooperate (also dated 2 March 2020) reiterates this position.

Economic growth

The constrained land supply position in Crawley means there is also an unmet need for employment land of a minimum of 21 hectares over the Plan period according to Crawley's Employment Land Trajectory. The unmet need for employment land has previously been significantly affected by the uncertainty of a possible additional runway at Gatwick Airport and the need to safeguard land for this reason.

However, it is now understood that CBC proposes through Policy SD3 to explore the possibility of removing the 'safeguarding' of 613 hectares of land to the north of Crawley, which has been designated for an Area Action Plan (AAP) to meet the future growth and operational needs of the airport alongside other development needs within Crawley, including housing.

Although MVDC would support CBC in utilising the land for non-airport uses, the following points should also be taken into consideration:

- The NWS EGA update 2020 concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). Given that Mole Valley does not form part of the NWS FEMA, MVDC is of the view that the responsibility for meeting Crawley's unmet employment needs, in the first instance, would fall to those local authorities within the NWS FEMA and then subsequently, if necessary, those areas with which influential economic linkages exist, which doesn't include Mole Valley.
- The EGA update 2020 also stated that there is potential for a greater level of business growth based on the 'unconstrained' uncapped local housing need figure of 752 dwellings per annum. This can only be planned for if current constraints on land supply are lifted. Using this approach, the EGA identifies an 'unconstrained' employment land requirement of 113ha for Crawley. CBC consider this amount of employment land is likely to be needed should further major urban extensions to Crawley come forward.
- Regarding the AAP proposed for the land north of Crawley, it is noted that work on it would commence within three months of the adoption of the Local Plan. CBC should consider bringing its preparation forward to align with the Local Plan Review 2020-2035 in order to determine the amount of housing which can be developed on land within the AAP boundary. It appears that the AAP may be able to contribute towards meeting Crawley's housing need. Therefore, without further assessment of land availability in the AAP, it is possible that the level of unmet housing need arising from Crawley maybe overstated or non-existent.

Furthermore, as has been previously stated within MVDC'S Regulation 18 consultation response, there are significant physical and policy constraints on development in the south eastern part of Mole Valley, adjacent to Crawley, which limit the potential for growth in this area. Transport links between Mole Valley and Crawley are weak, mainly comprising rural lanes with limited capacity. The only A-road connections are the A217 and A264/A24. The A217 reduces to a single carriageway north of the CBC boundary and serves only one small settlement (Hookwood) in Mole Valley before continuing north to Reigate. The A264/24 is far from a direct route; the A264 lying to the south of Crawley and connecting to the A24 some 5km south of Mole Valley's boundary. Public transport connections are also weak, with only limited bus services in the rural parts of southern Mole Valley.

Gatwick Airport is a major constraint, both in physical terms and in terms of the consequences of air traffic on the southern part of Mole Valley. The south eastern part of Mole Valley is also significantly impacted by flooding (Flood Zones 2 and 3).

For the reasons outlined above, we consider that Mole Valley would be unable to accommodate CBC's unmet employment land needs owing to the identified physical and policy constraints, in conjunction with the limited available employment land within the south eastern part of the District.

Gatwick Airport

MVDC notes that Policy SD3 signals intent for Crawley Borough Council to produce an Area Action Plan for the land currently safeguarded for a potential second runway at Gatwick Airport. MVDC supports this approach, and will comment on such proposals at the appropriate time. We also note that Policy SD3 safeguards land that corresponds with the Gatwick Airport Masterplan. MVDC has recently published a draft Local Plan for consultation that uses the same updated boundary to safeguard two small parcels of land that fall within Mole Valley District.

MVDC welcomes the addition to Policy GAT1 of a reference to Nationally Significant Infrastructure Projects at Gatwick Airport. We agree that points i-iv must apply to any development proposals at the airport that fall within the scope of the Planning Act 2008.

Yours faithfully,

Jane Smith

Jane Smith
Interim Planning Policy Manager

Strategic Planning
Crawley Borough Council
Town Hall
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If telephoning please ask for: Andrew Barber

Email: planning.policy@molevalley.gov.uk

2 March 2020

By email only

Crawley Borough Council Local Plan Review (2020-2035): Duty to Cooperate

Dear Sir/Madam

Thank you for your 'Duty to Cooperate' letter dated 21 January 2020 setting out Crawley Borough Council's position in relation to meeting the boroughs objectively assessed development needs.

Housing

CBC calculates their local housing need to be 752 dwellings per annum using the 'Standard Method' set out in planning practice guidance. This equates to a total housing need of 11,280 dwellings over the lifetime of the 15-year plan (2020-2035). Crawley's Local Plan Review identifies the borough's housing land supply to be 5,355 dwellings over the plan period. This leaves a total unmet need figure of 5,925 net dwellings.

MVDC recognise the difficulties in delivering sustainable growth and the challenge of effectively balancing competing environmental, social and economic pressures. Nonetheless MVDC are concerned that CBC will have an unmet need of approximately 5,925 net dwellings over the plan period (2020-2035). Based on the reasoning set out below, it is considered MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet housing need.

Housing Market Area

CBC say there is already a long-established, effective joint working within the Northern West Sussex (NWS) Housing Market Area (HMA). The NWS HMA comprises Crawley, Horsham, Mid Sussex and a small part of Reigate & Banstead local planning authorities and does not include Mole Valley District.

Crawley's unmet housing need established from CBC's adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Currently the adopted Local Plans for Horsham and Mid Sussex are anticipated to provide an additional 3,150 dwellings above their objectively assessed housing needs, mostly to meet the unmet housing need arising from Crawley. CBC says that local plan reviews have acknowledged the 3,150 dwellings figure is

likely to change in particular because the 'standard method' for calculating local housing need increases the housing needs in Horsham and Mid Sussex above those established in their respective adopted Plans.

MVDC considers that as Mole Valley does not form part of the NWS HMA, the responsibility for meeting Crawley's unmet housing needs, in the first instance, would fall to those local planning authorities within NWS HMA.

Constraints, Green Belt and demonstrating Exceptional Circumstances

CBC say its adopted Local Plan is acknowledgement that there is very limited land within Crawley for accommodating further development because of the boroughs tight administrative boundaries; the historic Gatwick Airport 'safeguarded' land for a potential southern runway; physical constraints such as aircraft noise contours, flooding, nature conservation constraints, and; few infill opportunities due to the age and planned nature of Crawley New Town.

Mole Valley is also heavily constrained. 75% of the district is within the Metropolitan Green Belt and this includes land adjacent to Crawley's administrative boundaries. The district is also constrained by landscape and environmental designations, including the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours associated with Gatwick. In addition, transport links and public transport connections between Mole Valley and Crawley are weak.

Mole Valley has published its Draft Local Plan (Future Mole Valley) for consultation between 3 February and 23 March 2020. It is clear from this draft plan MVDC cannot meet its own housing need on brownfield land and/or within the district's existing built-up areas. At this stage, MVDC has not identified any opportunities for part of Mole Valley's housing need to be met by neighbouring local planning authorities. Therefore, having fully explored all other reasonable options for meeting the district's housing need, exceptional circumstances may exist for MVDC to consider some degree of change to Green Belt boundaries. This is one of the principles which is being considered through MVDC's current Regulation 18 consultation.

Paragraph 137c of the NPPF 2019 says that before concluding exceptional circumstances exist to just changes to Green Belt boundaries, MVDC has to demonstrate it has examined fully all other reasonable options for meeting its identified need for development. This will include whether the strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of Mole Valley's identified need for development. Therefore where neighbouring local planning authorities, particularly those in the NWS HMA as they are not constrained by Green Belt boundaries, are capable of meeting their own housing needs then further discussions may be required about whether they could accommodate some of Mole Valley's housing need, to avoid changes to Green Belt boundaries, which both MVDC and the Government attach great importance to¹.

Area Action Plan for Land North of Crawley

CBC proposes removing the 'safeguarding' of some 613ha of land for a potential southern runway at Gatwick Airport and preparing an Area Action Plan (AAP) for the future development of this land. The AAP will assess needs for future growth and operational needs of airport alongside other development needs arising in Crawley including for housing, though CBC state housing development would be limited due to aircraft noise contours. CBC would commence work on the AAP after the adoption of the Submission Draft Crawley Local Plan 2035 which is

¹ As indicated in Paragraph 133 of the NPPF 2019.

expected in December 2020² (notwithstanding the Planning Inspector's recommendations following independent examination of the Local Plan).

MVDC supports CBC in seeking to remove the current safeguarding. CBC should consider bringing forward preparation of this AAP to align with the Local Plan Review 2020-2035 in order to determine the amount of housing which can be developed on land within the AAP boundary. It appears that the AAP could potentially contribute towards Crawley's unmet housing need. Without further assessment of land availability in the AAP, it is possible the level of unmet housing need arising from Crawley maybe overstated or non-existent.

Employment

Joint working across Northern West Sussex (NWS) also resulted in a joint assessment of economic growth. The NWS Economic Growth Assessment (EGA) 2020 update recommends an identified need for a total of 33ha of employment land in Crawley based on the continuation of past development trends which in turn is based on a constrained land supply. However, Crawley's Employment Land Trajectory only identifies a supply of circa 12Ha, resulting in an unmet need of at least 21ha of employment land over the plan period. Furthermore, the EGA update 2020 also said there is potential for a greater level of business growth based on the 'unconstrained' local housing need figure of 752 dwellings per annum. Using this approach, the EGA identifies an 'unconstrained' employment land requirement of 113ha for Crawley. CBC consider this amount of employment land is likely to be needed should further major urban extensions to Crawley come forward.

It is considered, for the reasons set out below, MVDC is not in a position to be able to assist CBC in meeting its unmet employment needs.

Functional Economic Market Area

The NWS EGA update 2020 concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). The assessment also identifies that influential economic linkages also exist with Coastal West Sussex, Reigate & Banstead (e.g. Horley) and East Sussex. Mole Valley is not included within the NWS FEMA nor is the district identified as having influential economic influences with NWS authorities.

MVDC considers that as Mole Valley does not form part of the NWS FEMA, the responsibility for meeting Crawley's unmet employment needs, in the first instance, would fall to those local planning authorities within NWS FEMA and then subsequently, if necessary, those areas with which influential economic linkages exist, which doesn't include Mole Valley.

Constraints

CBC say its adopted Local Plan is acknowledgement that there is very limited land within Crawley for accommodating further development because of the boroughs tight administrative boundaries; the historic Gatwick Airport 'safeguarded' land for a potential southern runway; physical constraints such as aircraft noise contours, flooding, nature conservation constraints, and; few infill opportunities due to the age and planned nature of Crawley New Town.

As stated previously, Mole Valley is also heavily constrained. 75% of the district is within the Metropolitan Green Belt and this includes land adjacent to Crawley's administrative boundaries. The district is also constrained by the Surrey Hills Area of Outstanding Natural Beauty (AONB), the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours

² CBC's Local Development Scheme 2019 to 2022.

associated with Gatwick. In addition, transport links and public transport connections between Mole Valley and Crawley are weak.

Area Action Plan for Land North of Crawley

As mentioned previously, CBC proposes removing the 'safeguarding' of some 613ha of land for a potential southern runway at Gatwick Airport and preparing an Area Action Plan (AAP) for the future development of this land. The AAP will assess needs for future growth and operational needs of airport alongside other development needs arising in Crawley including for economic growth. CBC would commence work on the AAP after the adoption of their new Local Plan and CBC say this work may conclude sites for Strategic Employment Locations can be identified within Crawley should some or all of the land encompassed by the AAP not be required for airport expansion.

Given the AAP covers approximately 613ha and the unconstrained employment land need is 113ha, it appears that all of Crawley's employment needs can be met within the Borough with surplus land available within the AAP which can be used to meet other development needs, including housing. MVDC therefore supports CBC in seeking to remove the current safeguarding. CBC should also consider bringing forward preparation of this AAP to align with the Local Plan Review 2020-2035 in order to determine the amount of employment land that can be developed within the AAP boundary.

Summary

In summary:

- MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet housing needs.
- MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet employment needs.
- MVDC supports the removal of safeguarding land for a potential southern runway at Gatwick Airport and supports the preparation of an AAP setting out the future development of this land to meet development needs arising in Crawley.
- CBC should consider bringing forward preparation of the AAP to understand the level of developments needs that can be accommodated within the AAP boundary.

Yours faithfully

Jane Smith

Jane Smith

Interim Planning Policy Manager