



Crawley Local Plan

<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.

Representations can be made via this form and emailed to strategic.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 [here](#).

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: 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 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.

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.**

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/localplanreview

Signature

Date

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

Our ref: Crawley LP2021-
2037/Reg 19

Your ref:

Date: 29 June 2021

Dear Sir/Madam,

**Re: Draft Crawley Borough Local Plan 2021-2037 (January 2021) – Submission
Publication Consultation**

Thank you for consulting Horsham District Council on the Draft Crawley Borough Local Plan 2021-2037. We are grateful for the opportunity to be able to further comment on your emerging plan, having made a number of comments at the previous Regulation 19 stage in early 2020. 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 co-operation and joint working between our councils, reflecting our joint housing market area and common functional economic market area.

We have a number of further comments on the draft Crawley Borough Local Plan, which follow and build on comments made in our letter dated 02 March 2020 responding to the earlier Regulation 19 consultation.

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**.

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. We note that a Densification Study is being prepared, to explain why particular densities will be appropriate and where, albeit the work is incomplete. The availability of a complete Densification Study is likely to be critical in addressing the concerns of HDC as set out in our further responses below.

Change sought: It is considered necessary to complete the Densification Study to justify the policy. This should include a spatial analysis of what is appropriate, or transparently present the evidence already gathered to evidence this.

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 EC1: Sustainable Economic Growth

We support this policy and note that the focus of new land allocations is to provide industrial units at Gatwick Green, whereas mixed business growth will be supported at Manor Royal and at existing employment sites. This is likely to complement Horsham's employment strategy which supports smaller business spaces and start-ups. We envisage that the two authorities will continue to work closely to ensure appropriate economic growth strategies in our respective areas.

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 complete the Densification Study to justify the policy. 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, and make a clear link between the evidence set out in the study and the assessed site capacities. This may lead to an increase to the 1,500 net dwellings increase set out in Policy TC3(iv).

Urban Extensions: 'At Crawley'

Paragraphs 12.17 to 12.23 set out a very detailed narrative on landscape character within the setting of Crawley, and a 'shadow' policy framework for development, for areas outside its administrative area. This would seem to replace former Policy H3g that was included in the previous Regulation 19 Plan (and is now deleted). We consider that this whole suite of paragraphs is **not effective**.

The new paragraphs go a great deal further than text and policy wording included in the previous version of the Plan. Whilst we appreciate the intention is to set a framework for shaping any 'At Crawley' developments and deliver on the aspirations of CBC, we consider it is inappropriate for inclusion in the Crawley Local Plan. This is because it seeks heavily to shape development outside Crawley's administrative area, and is therefore ineffective. It is for other Local Plans that have legal remit as the adopted development plan to set these parameters in the areas concerned. Otherwise, there may be conflicting policy statements in respective local plans, causing confusion.

HDC notes the strong history of successful joint working arrangements between CBC and HDC on cross-boundary matters. Most recently HDC and CBC have been in regular discussions on our respective plans to help ensure that the needs arising from Horsham and Crawley District

can be met. CBC has also been part of ongoing discussions as part of the Planning Performance Agreement with Homes England in relation to the proposals for development to the West of Ifield, which is primarily located in Horsham District's administrative area. The authorities are in the process of agreeing a Statement of Common Ground that it is envisaged will address the potential for allocations that will extend the built form of Crawley but are located in Horsham District. We consider a continuation of this collaborative approach is the most effective place-shaping mechanism.

We have a particular concern regarding reference in paragraph 12.20 which asserts that 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. Whilst HDC supports working towards a joint approach on such matters, this principle has not been agreed with HDC and, insofar as it relates to development in Horsham District, is ineffective. It must be borne in mind that Horsham District itself has a very high assessed need for housing, including an affordable housing need of 503 homes per year, meaning that there may be limited opportunity to meet a significant proportion of Crawley's affordable housing need in addition to our own requirements.

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 completely justified as stands**.

We acknowledge that land supply in Crawley is highly constrained, and accept that Crawley Borough Council will be unable to meet their full housing requirement within its administrative boundary during the plan period. It is however considered that clearer evidence is required to fully determine the precise level of unmet need, which will assist Horsham District in considering the extent to which any need could be met as part of the review of the Horsham District Local Plan. For example, Policy CL5 sets minimum densities for development, and Policy TC3 identifies a number of Key Opportunity Sites in the Town Centre. Paragraph 11.22 states that at least 1,500 dwellings are anticipated across all of these sites (consistent with Policy H1). Whilst this is welcome it is considered that the clearer evidence is required to fully demonstrate how this number has been arrived at, including a comprehensive study of opportunity sites within the town centre, and appropriate densities within these.

Secondly, it is also not clear how opportunities for estate regeneration (and associated densification) have been looked at. The draft Local Plan in paragraph 12.68 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.

We do however welcome that the windfall assumption has been increased significantly from 55 dpa to 90 dpa which we agree is a more realistic figure. We note that Topic Paper 4: Housing Supply helpfully sets out the reasons for this increase (including permitted development rights allowing conversion of offices in recent years), and detailed analysis included in the Windfall Statement 2021.

To ensure that a robust unmet need figure can be agreed, it is requested that the Densification Study is completed, including to consider further, or robustly evidence, that appropriate capacities have been assumed for sites in the SHLAA. This is essential to ensure a full understanding of how much of the Crawley housing needs will remain unmet, and ensure that

HDC can also robustly demonstrate it is planning appropriately for cross-boundary needs. An increase in small site delivery in the earlier years of the Plan period would be particularly helpful for meeting the needs of the wider HMA, given that HDC, as part of the preparation of its own local plan is considering the potential to deliver new homes on large strategic sites which have longer lead-in times in delivering new homes.

Change sought:

To ensure that a robust unmet need figure can be agreed, it is requested that the *Densification Study* is completed, to consider the points 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. Continued discussions on these matters would be welcome as part of our ongoing Duty to Co-operate discussions.

Strategic Policy H2: Key Housing Sites

We support this policy in principle, but **consider it is not completely justified as stands**. As set out in our comments to earlier policies (and in particular Policy H1), further evidence is required to support the overall number of dwellings suggested, given that there may be some further capacity identified through a completed *Densification Study*.

Change sought: The *Densification Study* should be completed and any necessary changes to housing site capacities and allocations made accordingly.

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 the *Densification Study*.

Change sought: It is considered necessary to complete the *Densification Study*. This should include analysis of whether 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 spaces whilst taking a pragmatic approach to allowing some housing development in certain circumstances.

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. We are also pleased to be given opportunity to work collaboratively with CBC on further consultancy-led work to better understand options for a safeguarded corridor in light of constraints and potential impacts.

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.

Yours sincerely,



Councillor Lynn Lambert
Cabinet Member for Planning and Development