



Crawley

Local Plan

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.

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:	<input type="text"/>	<input type="text"/>
First name:	<input type="text"/>	<input type="text"/>
Surname:	<input type="text"/>	<input type="text"/>
Organisation:	<input type="text" value="[Resident 49]"/>	<input type="text"/>
Address line 1:	<input type="text"/>	<input type="text"/>

Address line 2:	<input type="text"/>	<input type="text"/>
Town/city:	<input type="text"/>	<input type="text"/>
Postcode:	<input type="text"/>	<input type="text"/>
Telephone:	<input type="text"/>	<input type="text"/>
Email:	<input type="text"/>	<input type="text"/>

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:	<input type="text"/>	Policy:	<input type="text" value="Strategic Policy H1 - Amount of Unmet Need and Stepping thereof"/>	Other:	<input type="text"/>
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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.

CBC's OAN of 750 homes per year needs to be adjusted to 718 homes per year to reflect the latest (1/4/2021) Standard Formula calculation. CBC have already noted this in their draft DtC document of March 2021 but not yet modified the main plan. This ripples into a reduction of 32 homes per year against the declared annual average unmet need. Further the CBC retained (proposed stepped) requirement has been established with an unnecessary & unjustified 10% buffer. This buffer should be reduced to 5% thereby increasing, in the first 10 years of the plan, the retained requirement by 5%. This further reduces the unmet need over the first 10 years of the plan to fewer than 3000 homes which is then 'covered' by the already in place commitments from North West Sussex HMA neighbours (Horsham and Mid Sussex) under their existing adopted local plans. As Horsham, and eventually Mid Sussex, review their local

plans they will then only be challenged with having to increase their support for CBC's unmet need (if they are able) from 1st April 2031. The DtC principles surely require CBC to take this approach in order to both preserve the integrity of existing plans and minimise unnecessary changes of previously planned unmet need support, as well as to give their NWS-HMA neighbours the maximum time to implement further strategic sites in support of their declared unmet need.

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.**

Amend numbers in Policy H1 to reflect all of the above. There are also numerous references to the 'old' OAN of 750 (base date 1/4/2020) that need to be updated to 718. N.B. Page 296 (Housing Trajectory) will then also require amendment.

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:**

Hopefully CBC will accept the proposed tweaks to the housing numbers and put forward modifications. In particular the application of a 5% buffer (rather than 10%) and the consequent adjustments to the DtC numbers (unmet need) are important. If CBC does not, then I would wish to challenge this at the hearings in order to fully test the reasons as to why.

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

27/06/2021

CBC Reg 19 Consultation local plan

- The draft DtC statement (March 2021) in para 2.3.2 onwards acknowledges that the latest government published metrics reduce the CBC need from 750 to 718 per annum giving an overall requirement of 11488 dwellings for the 16 year plan period.
- Strategic Policy H1 consequently needs amending to reduce the stepped unmet needs stated therein by 32 homes per year, for each of the 16 years.
- On Page 156 of the CBC R19 plan, it notes a 10% buffer 'as required by NPPF para 73'. This 10% buffer, will of course have influenced the values set out in the proposed stepped requirement for CBC's retained need.
- However, the 10% buffer noted in NPPF 73 refers to the situation where it is intended to 'confirm' the housing land supply position. There is no explanation or confirmation as to if that is the actual intent, or if it is a simple misinterpretation of the wording in the NPPF paragraph.
- Given the extent of unmet need proposed in the local plan, it is inappropriate to propose 'confirming' the housing land supply as working with the standard 5% buffer will reduce the unmet need over the first 10 years of the local plan, by increasing the retained requirement (by 5%). (See attached calculations, with an alternative working to a 5% buffer).
- Moreover taking this step creates the 'ideal' equitable situation that all of the proposed Crawley BC unmet need up to 31st March 2031 will be met by the fulfilment of existing commitments of Horsham and Mid Sussex district councils under their existing adopted local plans, **crucially without any amendment**.
- CBC would then only be seeking additional support from these 2 neighbouring local authorities (in the North West Sussex HMA) from 1st April 2031, thereby giving these neighbouring authorities time to incorporate additional into their own local plan reviews, but not for the first 10 years of their new plans.
- CBC should be doing as much as it can to avoid ceding housing need to its NWS-HMA neighbours. Adopting the 5% buffer and adjusting its own retained requirement upwards by 5% (to reflect the buffer decreasing by 5%) makes perfect sense and allows CBC to advise Horsham/MidSussex that if its proposed new plan housing numbers are approved then it will only need additional support (to that already contracted) from 1st April 2031.
- This would demonstrate that CBC has done all it can to avoid disturbing the existing planned DtC support from its neighbours, and only requesting additional support when it is needed i.e. after 2031.

CRAWLEY Borough Council - Reg 19 Local Plan - 2021 to 2037 (16 years)

Standard Formula homes per year = 718 16 Years Total = 11488

Scenario (A) as currently proposed in the CBC Reg 19 consultation plan

10% Buffer	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37
Projected	220	437	453	295	582	952	696	509	400	187	120	105	90	90	90	90
...cumulative					1987	2939	3635	4144	4544	4731	4851	4956	5046	5136	5226	5316
Requirement	350	350	350	350	350	450	450	450	450	450	220	220	220	220	220	220
...cumulative					1750	2200	2650	3100	3550	4000	4220	4440	4660	4880	5100	5320
Projected/Requirement %					113.5%	133.6%	137.2%	133.7%	128.0%	118.3%	115.0%	111.6%	108.3%	105.2%	102.5%	99.9%

	Total Reqt	CBC Reqt	Unmet	Per Year
Years 1-10	7180	4000	3180	318
Years 11-16	4308	1320	2988	498
Total	11488	5320	6168	386

Scenario (B) as suggested to meet a 5% buffer with 10 year CBC retained reqt increased by 5% from 4000 to 4200

5% Buffer	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37
Projected	220	437	453	295	582	952	696	509	400	187	120	105	90	90	90	90
...cumulative					1987	2939	3635	4144	4544	4731	4851	4956	5046	5136	5226	5316
Requirement	360	360	360	360	360	480	480	480	480	480	190	190	190	190	190	170
...cumulative					1800	2280	2760	3240	3720	4200	4390	4580	4770	4960	5150	5320
Projected/Requirement %					110.4%	128.9%	131.7%	127.9%	122.2%	112.6%	110.5%	108.2%	105.8%	103.5%	101.5%	99.9%

	Total Reqt	CBC Reqt	Unmet	Per Year
Years 1-10	7180	4200	2980	298
Years 11-16	4308	1120	3188	531
Total	11488	5320	6168	386

Existing Adopted Local Plan Commitments under DtC to meet CBC unmet need (only for the years relating to CBC new local plan)

Horsham	150 yearly	2021 to 2031	10 years	1500
Mid Sussex	214 yearly	2024 to 2031	7 years	1498

2998 which meets unmet need of 2980 in example scenario (B) i.e. with a 5% buffer, not 10%.

Horsham & Mid Sussex additional DtC support from 1/4/2031 to be dealt with as their existing local plans are reviewed.