



TOWN PLANNING LTD

The Studio | 18 Orchard Drive | Edgware | Middlesex HA8 7SD
T: 020 3322 6890 www.smbtownplanning.co.uk

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

29 June 2021

Our ref: SMB/jb/2020/18

Dear sir,

**REPRESENTATIONS TO THE CRAWLEY LOCAL PLAN 2021 -2037 SUBMISSION DRAFT
ON BEHALF OF OXFORD MATCH LIMITED**

Oxford Match Limited have aspirations for the development of their freehold property interests within Crawley town centre.

Therefore, the following draft policies relating to development within Crawley town centre are directly relevant:

- EC1 and EC2,
- TC1 to TC5, and
- H2, H3c and H5.

Taken together these above policies are generally supportive of the principle of, inter alia, development comprising the conversion of the upper floors of existing properties for residential use together with appropriate upward extensions of buildings to provide additional dwellings. This is particularly in the situation that Crawley Borough Council find themselves in being heavily reliant on neighbouring local planning authorities and windfall sites to assist in meeting the identified housing need over the period of the Local Plan.

Our main concern however is with Policy H5, which as drafted, expects town centre sites requiring 25% affordable housing to be split 60% social rent and / or affordable rent and up to 40% as intermediate tenure. At a site specific level however, Policy H5 identifies the circumstances under which this target may not be met and provides for a financial payment for off-site provision.

We are concerned however that the table under paragraph 13.14 indicates the provision of 30% of the market housing element on town centre sites should be Family Homes (3+ Bedrooms). In addition to this the table indicates that the affordable rental element to be provided should be 30% to 40% as Family Homes. This seems to be excessive especially for a flatted town centre development and may have the adverse effect of reducing the viability of town centre schemes and consequently may well materially alter the affordable housing provision.

Naturally, there are a number of draft detailed development management policies that would be used by the Council to assess planning applications. Oxford Match Limited have concerns

specifically with draft Policies DD3 section i to v and consequentially that sentence of draft Policy H3b which refers to DD3(i to v) as currently drafted.

Our objection to draft Policy DD3 is on the grounds that it is too prescriptive. In particular, the draft policy contains criteria that are beyond the scope of Central Government's nationally described space standard for high and medium-density schemes, notably requiring a minimum floor to ceiling height of 2.7m (as opposed to 2.3m) for 3-person, 2-bedroom units and above. In addition, private outdoor open space (2.5m deep by 4m wide = 10sqm) to be associated with residential development is far too large for town centre schemes.

Policy DD3 as drafted will not make the most efficient use of deliverable land, particularly constrained town centre sites. The Policy as drafted could undermine and conflict with Policy CL2 (principles of good urban design) and CL3 (using land more efficiently and sustainably), as well as, more importantly, those policies seeking further residential development in the town centre such as Policy TC1 to meet the Council's identified housing needs.

Policy DD3 should be modified accordingly by stipulating minimum floor to ceiling height of 2.3m is acceptable and that in town centre residential schemes the minimum acceptable depth for private outdoor amenity space is 1.5m with the minimum area being 5sqm for 1 and 2 person flats plus an extra 1sqm each additional occupant.

We trust that these comments will be taken on board by the Council and the Inspector appointed to hold the Examination in Public in due course.

Yours faithfully



Simon Birnbaum BA Dip UPI MRTPI
Director
SMB TOWN PLANNING LIMITED
E mail: simon@smbtownplanning.co.uk