

Planning Policy  
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*Sent by email to [strategic.planning@crawley.gov.uk](mailto:strategic.planning@crawley.gov.uk)*

Our ref: Crawley LP2024-  
2040/Reg 19

Your ref:

Date: 20 June 2023

Dear Sir/Madam,

**Re: Draft Crawley Borough Local Plan 2024-2040 (May 2023) – 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 comments at the previous Regulation 19 stages in early 2020 and mid-2021 respectively. 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 some further comments on the draft Crawley Borough Local Plan, which follow and build on comments made in our letters dated 02 March 2020 and 29 June 2021 respectively, responding to the earlier Regulation 19 consultations.

We 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 prior to the upcoming examination.

Strategic Policy CL4: Compact 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 step in ensuring no stone is unturned in seeking to maximise meeting identified housing needs in Crawley. We note that Reasoned Justification paragraph 4.43 states:

*“Policy CL4 establishes a minimum density expectation for the borough of at least 45 dwellings per hectare. This has been reached through an assessment of the town’s existing density levels, considering good practice within the borough and through seeking to achieve a challenging but generally appropriate minimum level in order to maximise effective use of land without creating significant harm to amenity and character.”*

In our comments submitted to the previous Regulation 19 Plan (Jun 2021), we noted that the forthcoming Densification Study would be likely critical in addressing our concerns with regards making optimal use of development land in Crawley and provide justification for the density ranges in Policy CL4. We are pleased to see that such a study has been completed and consider that the Compact Residential Development Study (May 2023) presents a very comprehensive theoretical analysis of good practice in higher density design, with particular focus on high accessibility corridors.

However, we have struggled to find explanation within the study for the density ranges in the policy (i.e. minimum 200dpa for high density, 60-200dpa for moderate density, and 45dpa elsewhere). We have also been unable to identify any methodology for determining appropriate density ranges for specific character areas (for example differentiating between town centre predominance of apartment blocks, Victorian terrace neighbourhoods, post-war municipal housing, etc). Such analysis should have provided benchmarks against which to assess individual sites (without a live planning permission) to feed into the SHLAA (which should seek the highest workable number of homes for the site), and in turn the calculation of overall urban capacity. In other words, the *assessment of the town's existing density levels* should be transparently presented and related to the density thresholds in Policy CL4.

**Change sought:** Further update to the evidence base document is sought to provide a spatial analysis of what density ranges are appropriate in given contexts. This should transparently present the assessment of the town's existing density levels and demonstrate the density ranges / minima to be sufficiently challenging by way of maximising use of development land.

#### 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 in principle but believe that its **effectiveness could be improved**

We 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 as HDC may have the ability to meet some of Crawley's unmet needs as we have a surplus of economic land supply.

Notwithstanding the above, we do have concerns with the **final sentence of paragraph 9.22** that suggests that the development West of Ifield development will provide two hectares of employment land. As we express in response to other sections of the plan, no decision has been made to allocate this site in the Horsham District Local Plan. Therefore at this stage it is not possible for the Crawley Local Plan to set out how much employment land may be included within any potential allocation. We therefore request that in order for the **plan to be effective**, the following change is made:

**Changes sought:** *We seek the removal of wording that can be interpreted as suggesting that the West of Ifield site would be allocated and that the amount of employment land has been determined.*

### Policy GAT1: Development of the Airport with a Single Runway

We **support** this policy in principle but believe that its **effectiveness could be improved**.

Development at Gatwick Airport important will clearly have major impacts in Crawley but also across a wider region that includes Horsham District. As such we have been working alongside CBC and other authorities, as part of the DCO process, to ensure that the impacts of airport growth are properly understood and assessed.

We recognise and welcome wording in paragraphs 10.13 and 10.14 relating to considering the cumulative impact of numerous small developments and working with neighbouring authorities, but note that such references are not included within the policy wording. Accordingly, such wording carries less weight and therefore we suggest that similar wording be inserted in the wording of the policy itself.

Further, there are references in paragraph 10.12 to passenger numbers, including that 53 million passengers are expected to use the airport in 2023. However, the most recent updated throughput provided to by Gatwick Airport themselves suggest that 32.8 million passengers were using the airport. It may therefore be appropriate to reflect updated information in the introductory paragraph.

**Changes sought:** We seek the inclusion of references to cumulative impacts of development and to working with other authorities within the policy wording. We also advise that it may be useful to supporting text to reflect updated information on passenger numbers.

### Policy GAT 2: Safeguarded Land

We **support** this policy, which sets out a clear basis for determining applications within this area. This is consistent with the approach taken by HDC.

### Policy GAT3: Gatwick Airport Related Parking

We **support** this policy, which seeks to limit new or replacement airport parking to within the airport boundary. This is consistent with the approach taken jointly thus far by Horsham District and Crawley Borough Councils.

### Strategic Policy TC3: Development Sites within the Town Centre Boundary

We **support this policy in principle**, and particularly welcome the increase in the target for residential net completions from 499 to 1,500 on the Town Centre Opportunity Sites. However, we **consider it is not justified as stands**.

Our reading of the SHLAA proformas suggests that assessments of net site capacities have in many cases been based on history of planning applications, pre-applications or masterplans. This is not unreasonable, particularly taking account of the need for a proportionate evidence base. However, given the context where the Local Plan is proposing to provide well below assessed housing needs, it is not clear from the assessments whether there are other opportunities to maximise site capacities and if so how they have been explored. This may be picked up in other evidence base documents –for example this may have been considered as part of the viability assessment work or as part of the assessment of alternatives as part of the SA/SEA process.

We also note that the reasoned justification (paragraph 11.24) advises that the retail capacity figures are considered to provide a sufficiently precautionary forecast of retail capacity for the Local Plan period to 2040. This might suggest that a greater proportion of residential units is achievable in the town centre, albeit balanced with the need to keep the town centre 'alive'.

**Change sought:** The SHLAA assessment documentation should provide further explanation regarding any assumptions or other evidence base documents used to ensure that the assessments are clear as to why the residential capacities are considered optimal and cannot be pushed up further, together with clarification on how alternative mixes of use and/or densities have been considered. It is considered this additional information would help ensure that the overall number of dwellings proposed is clearly justified and demonstrate there is a maximum contribution that has been made in reducing unmet housing need within the wider HMA.

### Urban Extensions: 'At Crawley'

Whilst HDC is considering development to the west of Ifield through its Local Plan review, we wish to make clear that at this stage no formal decision has been made on the proposed allocation of the land in its Local Plan. Following the recent elections, HDC will be reviewing all development proposals which have been submitted to ensure that the local plan reflects the aspirations of the new administration.

We recognise that CBC will take a strong interest in potential development on or near its boundary as development in such areas may have cross-boundary impacts. Because of this, and building upon our strong history of successful joint working, we have been in constant discussions on a range of matters to understand Crawley's needs and viewpoints when considering these proposals to date, and very much welcome and support this process. This will be set out in updated statements of common ground which are in the process of being finalised. Further, CBC has also been part of ongoing discussions as part of the Planning Performance Agreement with Homes England in relation to development proposals to the west of Ifield that are being considered as part of the Horsham District Local Plan Review.

We have commented on previous versions of this section of the plan and our position remains the same. Paragraphs 12.17 to 12.23 collectively set out a very detailed narrative on landscape character within the setting of Crawley. This section replaces draft Policy H3g that was included in a previous Regulation 19 version of the Plan and includes a 'shadow' policy framework that seeks to influence land use on areas outside CBC's administrative area. Given such land lies outside of the administrative area of CBC, the paragraphs and 'shadow' policy are ineffective. It is for the Horsham District Local Plan to set the policy parameters in such areas. We continue to consider that this whole suite of paragraphs is **not effective** and we firmly request that our previously made comments are fully taken into account and these references be removed. Furthermore, our view is that the retention of such wording would cause confusion should there be any conflict with any wording that is set out in the emerging Horsham District Local Plan in due course. We consider a continuation of this collaborative working is the most effective place-shaping mechanism.

We are particularly concerned with regards to references in paragraph 12.20 and in sub-clause vii of the 'shadow' policy within 12.23. This is as they collectively assert that development on land located near, but ultimately outside of Crawley's administrative area, should help address Crawley's unmet housing needs – including on matters relating to affordable housing, housing mix, type and tenure. As already outlined, whilst HDC supports working towards a joint approach on such matters, this principle of meeting CBCs unmet needs has not been agreed with HDC, and insofar as it relates to development within Horsham District, the proposed plan wording would be ineffective. As is expected to be set out in the Northern West Sussex Housing Market Area Statement of Common Ground,

development identified in Local Plans will firstly meet needs in their respective administrative areas.

Further to the above, the paragraphs do not reflect the current context for plan-making within Horsham in light of the impact on future housing delivery of water neutrality. Though the housing requirement in the existing Horsham District Planning Framework (adopted 2015) was increased by 150 homes per year to help address unmet need in Crawley, CBC has been made aware that HDC is highly unlikely to be in a position to meet its own housing needs going forward, let alone meet the needs of other authorities. This is mainly due to issues relating to the ongoing need to ensure water neutrality in new development. Reference should be made in this respect to our recent letter to you dated 19 April 2023. Given this, CBC should not expect that HDC will be able to contribute to meeting unmet needs in the short to medium term.

### Strategic Policy H1: Housing Provision

We **support aspects of this policy**, in particular references that all reasonable opportunities will be considered to develop on brownfield sites and surplus green space and to capitalise on town centre living.

However, we consider that the policy **is not completely justified as it stands**.

As we have expressed previously, we recognise that Crawley Borough is highly constrained for the reasons set out in the Local Plan, and accordingly that the Council will be unable to fully address housing needs within its administrative area.

It was the expectation that density work was being undertaken with the view to optimising the amount of housing that could be delivered on proposed housing sites, potentially increasing the amount of housing that the Local Plan would identify as coming forward within the borough and thereby reducing the identified level of unmet needs. Whilst there have been some increases in homes proposed on some allocated sites, it is not clear how these increases directly relate to the Compact Residential Development Study. We have further identified issues with the effectiveness of this work in response to policies CL4 and H2.

Similarly, as we also express in response to policy H3a, we are not clear as to why there appears to have been no work undertaken to examine the potential that estate regeneration projects could make to assist in meeting unmet needs within Crawley Borough.

We are supportive of the further increase of the windfall allowance to 100 dwellings per annum, as expressed in paragraphs 12.15 and 12.16 and agree that your evidence base shows that this is a realistic figure to include within your Local Plan.

As we have set out in our comments above in relation to paragraph 12.17 to 12.23, HDC is unlikely to be able to assist in addressing Crawley's unmet housing needs. In this context, **we do not think the final paragraph of the policy wording is, in its current form, justified** nor do we think that paragraph 12.39 recognises the position that HDC finds itself in.

**Changes sought:** Whilst we are committed to working in a collective and positive manner across the Northern West Sussex Housing Market Area (NWSHMA) as our Local Plans advance, HDC is unable to commit to apportioning any development that may take place within Horsham District to meet the needs of Crawley Borough. The final paragraph of the policy should therefore be altered to remove the suggestion that development at such locations would address unmet needs arising specifically in Crawley. It would however be acceptable to refer to

ongoing joint work across the NWSHMA, and exploration of the potential to meet some of Crawley's education and affordable housing needs.

Whilst we are pleased that recognition of the assistance provided to CBC in the existing Local Plan (Horsham District Planning Framework) is included within paragraph 12.39, we think the final sentence should be clear that it is unlikely that HDC will be able to assist in addressing unmet needs in this Local Plan cycle.

### 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 transparently demonstrate that site capacities have been optimised, thereby justifying the overall number of dwellings proposed. The following paragraphs elaborate on why this view has been reached.

It is unclear as stands as to why the Compact Residential Development Study (CRDS) only provides more detailed analysis of one sample site (site 16) by way of supporting the SHLAA assessments (the table following paragraph 6.12).

Moreover, the method of analysis does clearly relate to the assessed 'net dwellings total' (or net site capacity) presented in the SHLAA. Our reading of the SHLAA proformas instead suggests that assessments of net site capacities have in many cases been based on history of planning applications, pre-applications or masterplans. This is not unreasonable, but in a context where the Local Plan is proposing to provide well below assessed need, it is not clear from the assessments whether there are other opportunities to maximise site capacities and if so how they have been explored. This is necessary to be clear why the assessed capacities are considered optimal and cannot be pushed up further.

We acknowledge and support that some proposed allocations have been reassessed as having a higher site capacity than before and this is welcomed. Totals have generally been revised arithmetically to meet the bottom of the density range in Policy CL4. However, we would question why the bottom of the range appears to have been assumed, rather than the CRDS recommendation triggering a re-evaluation of opportunities to increase the number of homes above the Policy CL4 minimum requirement.

**Change sought:** Where net site capacities have been changed to meet the bottom end of the relevant density range, the SHLAA assessment proformas should explain how the site evaluation has arrived at the capacity estimate. This should consider whether a greater number than the minimum within the relevant density range may be achievable, and if not, explain why a higher number is not feasible. Such further work may increase some housing site capacities which may in turn reduce unmet housing need within the wider HMA.

### Strategic Policy H3a: Estate Regeneration

We support this policy in principle, but **consider it is not justified as it 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. We had previously commented on the policy in both 2020 and 2021 and suggested that this could be done as part of the density work that was being undertaken (and is now published). However, it does not

appear that estate regeneration opportunities formed part of this work nor, given the wording of paragraph 12.67, that any such exploration has taken place or is currently planned.

**Change sought:** We request that paragraph 12.67 is more positive in its wording and sets out a commitment for CBC to explore estate regeneration opportunities. Given the high level of unmet needs identified we feel that 'no stone should be left unturned' in exploring what can be done to reduce this disparity, as such we would suggest that this work is undertaken as soon as is possible.

#### 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 other policies within the plan.

#### 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.

#### Policy H8: Gypsy, Traveller and Travelling Showpeople Sites

We **support** this policy in principle but consider that **its effectiveness could be improved** to reflect that need may arise across the housing market area, rather than just within Crawley Borough, which would justify the release of the site.

Though the Horsham Local Plan is still emerging and an updated assessment of the need for pitches and plots is yet to be finalised, our emerging evidence suggests that it is unlikely that HDC will be in a position where we can identify how all of our needs for gypsy and traveller provision could be met. If such a circumstance were to arise, we would seek assistance from yourselves as we share a common housing market area, to meet any unmet needs. We will endeavour to provide clarity on this point as soon as we are in a position to do so.

**Change sought:** It is considered that the words 'in Crawley' should be removed from the policy to reflect that need may arise elsewhere. Consequential changes to the reasoned justification should also be made for the same reason.

#### Policy SDC4: Water Neutrality

We **strongly support** this policy.

The policy recognises the importance of water neutrality across the Sussex North Water Resource Zone (WRZ) and sets out a policy framework to ensure that new development will comply with water neutrality requirements. The policy is based on joint evidence base prepared with HDC, Chichester District Council and other partners. It has been endorsed by Natural England and refers to a joint local authority-led offsetting scheme which is being proactively progressed.

It is intended that the same policy wording will be included in the HDC Local Plan and already features in the Chichester District Regulation 19 version of their Local Plan. It is considered imperative that a consistent policy approach across the WRZ be applied as it is the most effective way to deal with water neutrality in a way which can maximise growth and investment within the respective LPA's and takes forward the recommendations of the joint evidence base.

We do not seek wording changes to the policy but wish to be advised of any proposed changes to the policy wording that may emerge through the examination process to ensure that a consistent approach is maintained.

Strategic Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Multi-Modal Transport Link

We **support** this policy subject to the following comment:

The corridor for new multi-modal corridor will need to be agreed jointly with HDC as most of any route would be within the administrative area of Horsham. Any area of safeguarding should not prejudice this potential. It is noted that this is recognised in the supporting text. We are also pleased to have been given opportunity to work collaboratively with CBC on consultancy-led work to better understand options for a safeguarded corridor in light of constraints and potential impacts. We confirm this work will inform our own consideration of safeguarding a corridor.

We hope that these comments are helpful.

We confirm that we would like to be invited to participate in the examination hearings related to the policies to which we have provided comments.

Yours sincerely,



Catherine Howe  
Head of Strategic Planning