

# Local Plan Representation

## FPLP522712470

### PART A Personal details

Title	
First name	
Last name	
Organisation	CPRE Sussex
Is the address	
Flat name or number	CPRE Sussex
House name or number	
Street	N/A
Neighbourhood	
Town	
County	
Postcode	
Email	nfo@cpresussex.org.uk
Confirm email	nfo@cpresussex.org.uk
Other phone number	
Has a planning agent been appointed?	No

### PART B Your representation

Which document would you like to make a representation on?	Crawley submissions on Local Plan
Which part of the Local Plan does this representation relate to?	Poicy
Please give details.	Strategic Policy H1: Housing Provisions
Legally compliant?	Yes
Sound?	No
Compliant with the duty to cooperate?	Yes
Please give details explaining your response.	<p>SUMMARY CPRE Sussex considers that Strategic Policy H1: Housing Provisions is unsound. . By means of the Standard Method formula the Draft Local Plan identifies a minimum housing need for the period of 12,080 dwellings, of which because of severe land-supply constraints only 5,030 (41,64%) can be accommodated within the borough. . The draft plan assumes that under the duty to cooperate the resultant unmet need of 7,050 dwellings can and will be accommodated by other local authorities, primarily Horsham and Mid Sussex. . Whether the intended recipients have the capacity within the environmental and infrastructure constraints to accommodate a the 7,050 dwellings, as well as the own substantial Standard Method housing needs, is assumed, not considered by the draft plan. v. Usage of the Standard Method formula is not mandatory. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for the communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development to achieve Water Neutrality in Horsham District and much of Crawley Borough, need to be considered. v. Crawley's unmet housing need should be adjusted accordingly. EXPLANATION 1. The Draft Local Plan identifies a minimum housing need for the period 2024-2040, determined by means of the Standard Method formula, of 12,080 dwellings (paragraph 12.8). 1.2 Because of Crawley's exceptional land and supply constraints, the plan makes provision for the development of a minimum of 5,030 net dwellings in the borough, therefore provision for only 41.64% of its Standard Method calculated need. 1.3 Crawley's remaining 7,050 (58.36%) dwellings will need to be considered through Duty to Cooperate discussions as part of the Local Plan Reviews for the other authorities within the Housing Market Area (primarily Horsham and Mid Sussex) along with a small part of Reigate and Banstead. particularly an overlap with</p>

**Please set out what modification(s) you consider necessary to resolve the issues you have identified above.**

the r commun t es, whether and how many of the 7,050 new dwe ngs can/cou d be accommodated by the ntended rec p ents shou d be determ ned n consu tat on w th them. Env ronmenta and nfrastructure constrants, nc ud ng the requ rement for deve opment n Horsham D str ct and much of Craw ey Borough to ach eve Water Neutra ty need to be cons dered. 9.1 Craw eyâ€™s unmet hous ng need can then be adjusted accord ng y.

**If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings?**

1 Craw ey Boroughâ€™s and supp y constrants are except ona , as s acknow edged by the draft p an (paragraph 2.3), and n consequence of those constrants 7,050 (58.36% of the 12,080) w ll have to be accommodated by other LPAs, pr mar y Horsham and M d Sussex, n add t on to the r Standard-Method determ ned hous ng need. 2. Usage of the Standard Method formu a s not mandatory, and an a ternat ve approach s warranted. Therefore, to enab e the Duty to Cooperate to be fu f ed susta nab y, and to ensure a susta nab e future for the r commun t es, whether and how many of the 7,050 new dwe ngs can/cou d be accommodated by the ntended rec p ents shou d be determ ned n consu tat on w th them. Env ronmenta and nfrastructure constrants, nc ud ng the requ rement for deve opment n Horsham D str ct and much of Craw ey Borough to ach eve Water Neutra ty need to be cons dered. 3. Craw eyâ€™s unmet hous ng need can then be adjusted accord ng y.

**If you wish to participate in the public examination hearings, please outline why you consider this to be necessary.**

Yes, I w sh to part c pate n the exam nat on hear ngs

**Form submitted by:**

I have taken part n Exam nat ons n Pub c of oca p ans. By tak ng part, one s ab e to commun cate d rect y w th the exam n ng nspector, and a so to quest on deve opers, who w ll argue aga nst, through the nspector.

on 09/06/2023

## PART B Your representation

Which document would you like to make a representation on?

Crawley submission Local Plan

Which part of the Local Plan does this representation relate to?

Policy

Please give details.

Strategic Policy H1: Housing Provision

Legally compliant?

Yes

Sound?

No

Compliant with the duty to cooperate?

Yes

Please give details explaining your response.

SUMMARY CPRE Sussex considers that Strategic Policy H1: Housing Provision is unsound. i. By means of the Standard Method formula the Draft Local Plan identifies a minimum housing need for the plan period of 12,080 dwellings, of which because of severe land-supply constraints only 5,030 (41,64%) can be accommodated within the borough. ii. The draft plan assumes that under the duty to cooperate the resultant unmet need of 7,050 dwellings can and will be accommodated by other local authorities, primarily Horsham and Mid Sussex. iii. Whether the intended recipients have the capacity within their environmental and infrastructure constraints to accommodate all the 7,050 dwellings, as well as their own substantial Standard Method housing needs, is assumed, not considered by the draft plan. iv. Usage of the Standard Method formula is not mandatory. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for their communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development to achieve Water Neutrality in Horsham District and much of Crawley Borough, need to be considered. v. Crawley's unmet housing need should be adjusted accordingly. EXPLANATION 1. The Draft Local Plan identifies a minimum housing need for the plan period 2024-2040, determined by means of the Standard Method formula, of 12,080 dwellings (paragraph 12.8). 1.2 Because of Crawley's exceptional land supply constraints, the plan "makes provision for the development of a minimum of 5,030 net dwellings in the borough", therefore provision for only 41.64% of its Standard Method calculated need. 1.3 Crawley's remaining 7,050 (58.36%) dwellings "will need to be considered through Duty to Cooperate discussions as part of the Local Plan Reviews for the other authorities within the Housing Market Area (primarily Horsham and Mid Sussex along with a small part of Reigate and Banstead. particularly an overlap with

Horley)â€™ (paragraph 12.39). 2. The draft plan (paragraph 12.39) indicates that whether the resultant 7,050 (58.36%) unmet housing need can be accommodated by the intended recipients, primarily Horsham and Mid Sussex, within their environmental and infrastructure constraints, has yet to be determined and agreed by those authorities. 3. Furthermore, having to accommodate the greater part of Crawleyâ€™s huge Standard Method derived unmet need as well as their own substantial Standard-Method determined targets (acknowledged by Crawleyâ€™s draft plan, paragraph 12.39) would most certainly render both Horsham and Mid Sussex District Councils vulnerable to Housing Delivery Test failure, and put at substantial risk their ability to meet 5-year housing land supply requirements. 3.1 In which event developers would seek permissions at Appeal if refused, to develop sites not allocated in their local authoritiesâ€™ local plans. 4. This is of considerable consequence because although councils allocate sites in local plans with the capacity to accommodate housebuilding targets, they have no direct control over housing delivery rates, but are nevertheless penalized when developers underdeliver against local plan targets. 5. Developers/housebuilders decide build-rates and they will not build more houses than can be sold at an acceptable-to-them profit. In the event of reducing sales, as in an economic downturn, they will adjust completion rates downwards, resulting in undersupply against targets, as happened in the aftermath of the credit crunch of 2007/08. 5.1 A further â€˜credit crunchâ€™ is now emerging, adding to uncertainty about the UKâ€™s economy and future growth. 6. Note that Chichester District Council is also seeking to export its unmet need to neighbouring LPAs, including Horsham District. Doubtless Adur and Worthing, and Brighton and Hove will do same, and Mid Sussex may well be in the frame for some of Brighton and Hoveâ€™s unmet needs too. 7. Build-rates might also be constrained by the requirement to achieve Water Neutrality. 7.1 The â€˜Sussex North Water Neutrality Study: Part C â€˜ Mitigation Strategy Final Reportâ€™, November 2022, advises that â€˜Water neutrality is required as long as there is potential for an adverse effect on the sensitive habitats in the Arun Valley. In practice this means it is required until Southern Water can provide an alternative water source to replace groundwater abstraction at Pulboroughâ€™ (page x). And that â€˜Should insufficient offsetting be available in a given year (as a sum of the contribution from the Scheme and from SWâ€™s water demand reduction activities) it may be necessary to restrict growth in the following year by way of Grampian Conditions in order to maintain neutralityâ€™ (paragraph 53). 7.2 The â€˜Crawley Borough Council Local Plan Review Sustainability Appraisal/Strategic Environmental Assessment Draft Report. For the Submission Local Plan May 2023â€™, states that â€˜Offsetting must be in place before water demand is generated, for instance before new houses are occupied. If it is not possible to provide sufficient offsetting up front, either because it cannot be delivered fast enough, or there is not enough available offsetting to meet demand, this will restrict the amount of growth that can go aheadâ€™. And that â€˜The more off-setting is needed, the more difficult it becomes to achieve water neutrality, due to the finite options available within the water resource zoneâ€™ (paragraph A27). Usage of the Standard Method formula is not mandatory 8. The Governmentâ€™s â€˜Guidance Housing and economic needs assessment guides councils in how to assess their housing needsâ€™ advises that the use of the Standard Method is not mandatory, â€˜if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examinationâ€™ with the caveat that â€˜There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstancesâ€™. (Paragraph: 003 Reference ID: 2a-003-20190220. Revision date: 20 02 2019) 8.1 Crawleyâ€™s land supply constraints are exceptional, as is acknowledged by the draft plan (paragraph 2â€™3, see also 1.32, 3.3, 12.11, 12.34), and in consequence of those constraints 7,050 (58.36%) of the 12,080 Standard Method determined target will have to be accommodated by other LPAs, primarily Horsham and Mid Sussex, in addition to their Standard-Method determined housing need. 8.2 An alternative approach is warranted. CONCLUSION 9. Usage of the Standard Method formula is not mandatory, and an alternative approach is warranted. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for

**Please set out what modification(s) you consider necessary to resolve the issues you have identified above.**

their communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development in Horsham District and much of Crawley Borough to achieve Water Neutrality need to be considered. 9.1 Crawley's unmet housing need can then be adjusted accordingly.

1 Crawley Borough's land supply constraints are exceptional, as is acknowledged by the draft plan (paragraph 2.3), and in consequence of those constraints 7,050 (58.36% of the 12,080) will have to be accommodated by other LPAs, primarily Horsham and Mid Sussex, in addition to their Standard-Method determined housing need. 2. Usage of the Standard Method formula is not mandatory, and an alternative approach is warranted. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for their communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development in Horsham District and much of Crawley Borough to achieve Water Neutrality need to be considered. 3. Crawley's unmet housing need can then be adjusted accordingly.

**If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings?**

Yes, I wish to participate in the examination hearings

**If you wish to participate in the public examination hearings, please outline why you consider this to be**

I have taken part in Examinations in Public of local plans. By taking part, one is able to communicate directly with the examining inspector, and also to question developers, who will argue against, through the inspector.