



Crawley

Local Plan

Ref No:

Office use only

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="Save West of Ifield campaign"/>	<input type="text"/>
Address line 1:	<input type="text"/>	<input type="text"/>

Address line 2:

Town/city:

Postcode:

Telephone:

Email:

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.**

The Local Plan highlights the need for improved healthcare and facilities for residents of the town and that they will be delivered locally (page 18). However it fails to say how this will happen and fails to recognise or mention the additional pressure that will be placed on these already strained services by people using them who reside in the out of town developments such as West of Ifield? This is a serious omission in the Local Plan.

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

- 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.**

The Local Plan states that local communities will be directly involved in planning how the town grows (Page 18). How does it reconcile this worthy sentiment with the fact that other local authorities seem intent on placing their housing developments on the borders / outskirts of Crawley including the potential West of Ifield development. Neither CBC or local communities have any influence or input in to these developments.

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

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.**

The Local Plan rightly recognises the positive impact that connective ecological networking and biodiversity has on the has on mental and physical wellbeing of the town's residents(Page 27 para. 2.36). However it fails to identify or comment on how this is being impacted on by the loss of local green space and amenities by out of town developments such as West of Ifield. Crawley's precious green space is being rapidly eroded and lost. The Local Plan identifies the importance on health on health of access to green open spaces (Page 35) but again fails to deal with these being lost on the town's borders by housing development.

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

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.**

The Local Plan identifies the need for Planning and Health Impact Assessments to plan for health Services and hospitals in any developments within the towns boundaries (Para. 3.20). This is laudible but fails to recognise the inability of CBC to control the or influence the provision on such services from developments, such as West of Ifield, on the town's borders. East Surrey Hospital and local health services within the town are already under intense pressure which will only be increased by the additional demand from such developments.

This is an unacceptable omission given that the Local Plan recognises the need for growing health care facilities including GP and dental services (Page 148 Para. 11.19)

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:

4.67

Policy: CL8

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.

Relevant text: West of Ifield Rural Fringe

Proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be encouraged.

SWOI Comment:

This policy should be updated given that CBC Full Council on 20th October 2021 passed Motion 2 unanimously as follows: 'Crawley Borough Council formally re-states its strongest possible opposition to the Homes England proposal to build up to 10,000 new homes to the west of Ifield/Crawley.'

The wording in the Local Plan conflicts with the Full Council policy.

Policy CL8 - paras 4.67 - 69

We support the comments made by Richard Symonds of the Ifield Society for the policy regarding the rural fringe to include a proposal for a Local Nature Reserve and Heritage Site across the area of the rural fringe.

Specifically this would designate as LNR a continuous area encompassing and joining-up the Willoughby Fields LNR, the Ifield Brook Meadows LWS and the Ifield Mill Pond LWS.

The case for this proposal is based on the richness of habitat and biodiversity recorded across the whole site, the fact that it protects the Ifield Brook and River Mole watercourses,

and not least the amenity and recreation the whole site affords to the existing communities who use it so heavily

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.**

The wording in the Local Plan conflicts with the Full Council policy and the Policy CL8 should reflect the full wording from the Full Council motion agreed by all members.

SWOI Response to the Crawley Borough Local Plan 2024-2040

Notes from [REDACTED] 14 June 2023

CL8 Development outside the Built-Up Area Boundary

Page 59

Relevant Text: West of Ifield Rural Fringe

Proposals that respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be encouraged.

SWOI Comment:

This policy should be updated given that CBC Full Council on 20th October 2021 passed Motion 2 unanimously as follows: ‘Crawley Borough Council formally re-states its strongest possible opposition to the Homes England proposal to build up to 10,000 new homes to the west of Ifield/Crawley.

Page 60

Relevant text:

vii “Minimise the impact of lighting to avoid blurring the distinction between urban and rural areas and in areas which are intrinsically dark to avoid light pollution to the night sky”.

SWOI Comment

This policy should be updated to reflect the need to control types of excessively bright and spreading security lights on **existing** buildings, which can seriously contribute to the light pollution in the area.

This problem of light pollution is picked up again in **Policy EP6: External Lighting on p 237**.

HA1 Heritage Assets p 79

SWOI comment

The list of designated and non-designated assets in Strategic Policy H1 fails to mention village greens. Ifield Village Green is the only registered village green in Crawley. It is contained within the Ifield Village Conservation Area. It also does not appear on the interactive map, although other designated and undesignated assets (i.e. buildings and monuments) do.

IN2 Location and Provision of New Infrastructure

Section referring to Water Neutrality on p 100

SWOI Comment

While the council sees increased flood risk from additional housing being mitigated by developers (presumably by installation of SUDs), it also acknowledges the need for increased sewerage capacity because the Crawley Wastewater Treatment Works (CWWTW) is almost at capacity. A 10-year lead time is needed for the enlargement of CWWTW, which would restrict major development should take place prior to 2033 at the earliest. It is not clear how this is consistent with the delivery of a minimum of 5,030 in the borough and a further 7,050 in neighbouring authorities, more than half of which are predicted to be delivered before 2033. (see figures on p 163, under H1 Housing Provision).

'At Crawley' Urban Extensions Key Considerations

PDF p 159

Current wording

12.23 Housing development through urban extensions on or close to Crawley's administrative boundaries will be supported by Crawley Borough Council where it can be shown: ...

SWOI comment:

This statement should be amended to read: "Housing development through urban extensions on or close to Crawley's administrative boundaries will **only** be supported by Crawley Borough Council where it can be shown: ..."

SDC4 Water Neutrality

PDF p222

SWOI comment

There is no mention of planning permission required for installation of swimming pools in back gardens or water features that require regular topping up. The document should be amended: "New planning restrictions will be imposed for the building of swimming pools in gardens".

Although grey water harvesting is mentioned in the plan there does not appear to be any policies to encourage residents to retrofit or the council to retrofit their own buildings.

ST4 Area of search for a Crawley Western Multi-Modal Transport Link

p243

Comment from SWOI

The multimodal transport link is a catch 22 for the borough. While it may well relieve the traffic congestion which is all too real within Crawley especially at rush hours, it will conflict with policies on heritage, environmental protection, and bio-diversity. It may also encourage the increased use of cars as opposed to using public transport.

A multimodal road is huge in surface area. 'Multimodal' indicates separate lanes for buses, cars, cyclists and pedestrians in both directions. This would require swathes of erstwhile countryside to be lost. In heritage terms this would no longer make Crawley a town in the countryside. The north of Crawley is bordered by Gatwick Airport, the east by the M23 and the south by the A264. At present, the west of Crawley is the main area where the New Town concept remains i.e. where one can walk from the town through the old village of Ifield into the countryside without having to cross a busy road. To put a major road to the west will be to encircle the town in very large transport routes. The description of '*It is an urban town which benefits from a countryside setting ...*' (para 2.1 p 19) will no longer be true.

Noise pollution will be an intrusive environmental impact, especially from the 24/7 continuous hum from traffic. While electric cars might be quieter, they do not get rid of tyre noise. The severity of the pervasiveness of such noise can be experienced already on the east side of the town at heritage sites such as St Nicholas Church in Worth and the Peace Garden in Tilgate Park and in the neighbourhoods of Maidenbower, Pound Hill and Forge Wood. The detrimental effect of noise on people's health recognised in **Policy EP4 Development and noise.**

The loss of woodland, hedgerows, fields and shaws, many of them ancient, will remove habitats in an area rich in wildlife and reduce the ability of the area to absorb carbon. The fine (FP) and extra fine particles (UFP) from tyre wear will pollute the air and the streams, many of which run through the area. The cross-boundary implications for the Green Infrastructure are incorporated in the **Strategic Policy G11 vi.**

This road has been on the radar of West Sussex County Council for a long time, certainly as far back as 2000 and possibly earlier. Perspectives and understanding have developed since then in matters such as climate change, the importance of carbon neutrality, the importance of maintaining rich biodiversity and the significance of green spaces for well-being. The time is right to rethink whether the multimodal road is the right answer to the very real problem that Crawley has with congestion. The Barton and Grant Health Map on p 34 is a graphic shows the interrelatedness of all these factors and the need to think globally.

Comments on CBC Local Plan.

Chapter 7 – Open Space, Sport and Recreation

Page 90

Save West of Ifield believe the policies set out in this chapter to be sound as they apply to Crawley itself, but would like to draw attention to the impacts on Crawley, and Crawley residents, should Horsham District Council approve Homes England's plans for the 10,000 house West of Ifield development.

1. Ifield Golf Course.

Should the West of Ifield development go ahead Ifield Golf Course will be closed and built on in Phase 1 of the plans.

Whilst the course is strictly in Horsham land, it sits within Ifield and is widely used by residents of Crawley Borough. See below extract from Horsham District Council's Golf Supply and demand assessment December 2022.

https://www.horsham.gov.uk/__data/assets/pdf_file/0017/121751/Golf-Supply-and-Demand-Assessment-December-2022.pdf

2.130 Ifield Golf & Country Club (48,731 people) has the highest number of people considered most likely to travel to it (based on travel distance only) when compared to the other facilities followed by Rookwood Golf Course (38,721 people). For Ifield Golf & Country Club, **it actually has a minimal catchment within Horsham District, with the majority of its area covering Crawley.**

The course is not surplus to requirements. Horsham District Council's Golf Supply and Demand assessment also states within it's conclusion, section 3.2:

'Supply is currently deemed to be sufficient to meet demand; however, it is also clear **that each facility is meeting a need due to current membership and usage levels. Potential future demand provides further evidence that each existing facility is required. It is unlikely that any loss of provision could be supported without appropriate mitigation being secured due to capacity pressures that would be created, despite the development aspirations that are in place.**

Homes England have no plans to build a replacement course (ref: Crawley Local Plan Policy OS1.)

The loss of this facility would therefore have a detrimental effect on Crawley residents in terms of their physical and mental health, especially those residents that are older, or less able to play other types of sport.

The course is also identified as part of the Ruser Ridge Biodiversity opportunity area, and borders Hyde Hill Woods, ancient woodland designated as Local Wildlife Space.

Therefore, should HDC allocate West of Ifield for development within its local plan, and /or a planning application be proposed, Save West of Ifield would deem assessments as detailed in Crawley Local Plan 7.14 and 7.15, necessary, and Policy OS1 applied.

2. Ifield Brook Meadows

Ifield Brook Meadows is natural water meadow and a designated Crawley Local Green Space; however, the land is owned by Homes England. Whilst under the proposals there are no plans to build houses on this land, there are plans to perhaps alter it from its current 'natural green space' to park land, which would have a negative impact on the area's quality. In addition, there are plans to add footpaths and lighting, which would negatively impact its delicate 'water meadow' eco system.

Again, should HDC allocate West of Ifield for development within its local plan, and /or a planning application be proposed, Save West of Ifield would deem assessments as detailed in Crawley Local Plan 7.14 and 7.15 necessary.

3. Crawley's last remaining rural fringe.

The land to the west of Ifield is Crawley last remaining rural fringe, widely used by the public for exercise and leisure. Should this land be built on this would have a detrimental effect on Crawley residents physical and mental health.

Save West of Ifield would again suggest that the policies set out within Chapter 7 of Crawley Borough Council's Local plan be referred to in the event of HDC allocating West of Ifield for development in its local plan, and /or if a planning application is received by them.

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:

IN1:
Infrastructure
provision

Other:

5. Do you consider the Local Plan to be: *(Please tick)*

5.1. Legally compliant? Yes No

5.2. Sound? Yes No

5.3. Compliant with the duty to co-operate? Yes No

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.**

In the event that further developments occur on 'At Crawley' on Crawley's boundary and especially a scheme the size of the proposed Homes England site(s) West of Ifield it will be necessary to upgrade the transport infrastructure within Crawley in order to support the proposals. In specific terms there will be a need to:

- upgrade the capacity of Ifield station including the parking provision
- install walking and cycling routes within Crawley to an approved standard (LTN1/20) from these sites to the key trip attractors in Crawley. This would include, but not be limited to, Manor Royal, Gatwick Airport, the Town Centre, the Leisure park, K2, The Hawth, Ifield Station.

Any development 'At Crawley' should be required to improve connectivity within Crawley Borough area to improve connectivity to existing infrastructure and to improve it in order to further encourage sustainable transport and reduce car usage and pollution.

It should be made clear that it is a requirement for these improvements to be provided and funded by any external developments.

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.*

The Local Plan rightly highlights the importance of Gatwick Airport as a major employer in the area. However it fails to analyse the impact of the Airport on housing demand in the area with an influx of workers. It also fails to highlight the need for employment diversification in the area given the uncertainties surrounding aviation as evidenced by the impact of Covid and its aftermath.

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***

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.*

The Local Plan recognises the impact of noise on residents but fails to highlight the potential impact of Gatwick generated aircraft noise on the potential West of Ifield development and the consequent effects on the well being of residents (Para. 10.10).

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.***

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.*

Save West of Ifield questions the assumptions that the Local Plan has made regarding the future growth of Gatwick Airport in view of the numerous uncertainties relating to aviation in general (section 10:11)

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***

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: 12.21

Policy: Western Link Road

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.**

Urban extensions at Crawley will require the implementation of a Western Link road as outlined in the Local Plan. However the line of the route is not clear and in practice it is likely that it would take many years to resolve this especially when the routing conflicts with Willougby Fields LNR and potentially the Gatwick safeguarding area. The net of this would be that it would not prove possible in practice to deliver this new link in advance of any development(s) West of Ifield. This either delays the implementation of this site or, more likely, results in the additional traffic being routed along the existing and already heavily congested roads including Overdene Drive, Rusper Road and Ifield Avenue. There would also be a general increase in traffic 'rat-running' through adjacent neighbourhoods like Gossops Green and Langley Green. In these circumstances what is the likelihood of the Western Link Road ever materialising?

The Save West of Ifield campaign are of the opinion that any Western Link Road should be fully designed and delivered ahead of any 'at Crawley' developments. Previous experience, i.e. Kilnwood Vale, suggests that this is unlikely and that the resulting additional congestion, noise and pollution will occur.

These issues are clearly laid out in 'At Crawley' Urban Extensions Key Considerations para 12.23. But there are no guarantees that this will happen as articulated in this policy.

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.**

The West of Ifield site(s) are adjacent to the Local Green Space of Ifield Brook Meadows and yet initial proposals from potential 'developer' Homes England indicate that pedestrian and cycle paths would be installed across this site. So it is not clear whether the Local Plan policy would prevent this or not?

In the event of it not being permissible then the 15 minute neighbourhood concept becomes stressed as routings for walkers, wheelers and cyclists would have to be less direct at best. In addition the positioning of these paths/walkways does not intersect with any existing network in the Ifield area apart from footpaths. The available footpaths are alongside Rusper Road and experience high traffic volumes and excessive speed.

The Local plan policy should explicitly require deliver of significant upgrades to these facilities and the installation of LTN1/20 compatible cycle routes across Ifield and adjacent areas before any development takes place.

Page 23 – para 2.20 – housing need

Page 24 – para 2.29 – housing need

Page 156 – paras 12.7 – 8 – housing need

Page 14 – para 1.27 – 33 – DTC

Page 164 – para 12.39 – DTC

By 2040, to meet the needs of its growing population, the town would need a further 12,080¹³ new homes. Accommodating even some of this need involves difficult decisions and invariably places pressure on some of the key features that define Crawley’s character.

[For the period from 2024 to 2040: 755 dwellings per annum x 16 years, based on the Standard Methodology Figure 2014-based Household Projections, calculated March 2023.]

SUMMARY COMMENT:

1. The Standard Method is deeply flawed and should not be used to calculate housing need. Instead a bottom-up approach should be used using ONS data on the components of population change for each LPA, plus consideration of other elements of need such as housing lists. The affordability adjustment has no basis in theory – neither is there any practical evidence for its validity – and it should be dropped.
2. A bottom-up approach suggests a need for Crawley of 6-700 houses a year.
3. Updating the Standard Method calculation with 2018-based ONS projections suggests an OAN of 360 a year, ie significantly below the bottom-up estimate.
4. Since a flow of households from Crawley to Horsham is already embedded in the ONS’s data, and since Horsham is massively (unsustainably) over-building in any case, there is no case for DTC building in Horsham.

DETAIL:

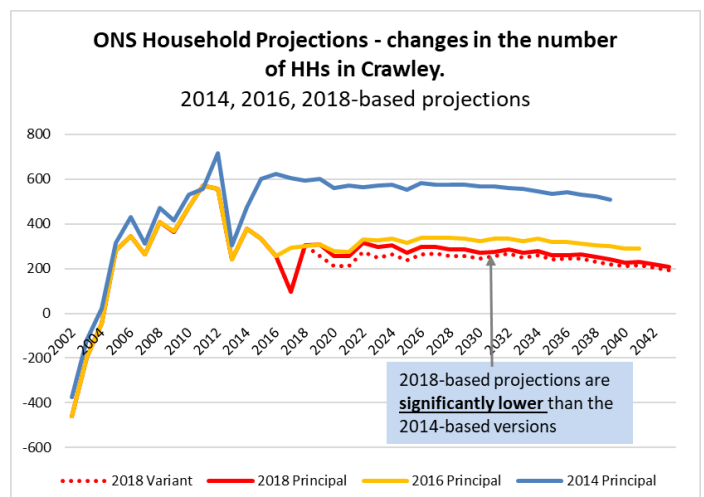
The **OAN Using the Standard Method**, the Plan and [Housing Needs Topic Paper](#) identify a need (OAN) for around 750 dwellings per year, or 12,000 dwellings over the proposed Plan period. Step 1 uses ONS’s 2014-based HHPs to give 570hhpa, and step 2 increases this by 180hhpa (32%) due to the Affordability Adjustment. These figures are shown in the table below.

Chart 1: Evolution of ONS population projections - Crawley

Chart 1 shows that the ONS population projections for Crawley have been revised down in subsequent datasets, ie the 2014-based projections were too high. This is the case for the vast majority of districts in the UK, but not Horsham. The 2018-based projections (red line) are around 300hhpa lower than the 2014-base projections.

The ONS’s 2021 Census results for Crawley are very close to the 2018-based projections for 2021, which lends credibility to these compared to the 2014-based projections currently used for the Standard Method.

So, using the 2018-based projections in the Standard Method would give a new target of 363 new houses a year (assuming unchanged affordability adjustment) as opposed to the current target of 750, ie 413 fewer new houses a year.



The current target and this possible new target are indicated in Table 1:

Table 1: Evolution of CBC’s House-building Targets, with Possible Future Target

	SHMA 2019	Draft Local Plan 2021	ONS 2018-based HHPs	2021 Census
ONS demographic projection	570	570	277	286
Uplift for affordability	182 (32% 2018)	180 (32% 2019)	86 (31% 2021)	89 (31% 2021)
TOTAL	752	750	363	375
Contribution from neighbouring LAs for unmet need	??	??		
TARGET				
	2019-2029	2019-2039	2019-2029	2021-2031

Taking a bottom-up approach based on the ONS's published components of population change shows that in recent years Crawley's births have exceeded deaths to the tune of around 300 households¹ a year. See Chart 2. International migration had been around 200 households a year, and was falling pre-pandemic but could be higher again now due to asylum seekers. So the need from these sources might be 4-500 houses a year. Crawley's housing list is around 2,000 households, and social housing is needed to bring it down. It's not straightforward to assess how many of the 2,000 might already be accounted for in the ONS's data (growing families and international migrants needing social housing), but a significant number will be 'hidden households', ie people and families living with relatives, but needing their own accommodation. So their needs should also be added in. So a **bottom-up approach might suggest Crawley has an overall minimum need of around 6-700 new houses of which at least 400 should be social housing.**

But **how does this reconcile with the OAN** of around 360 which would be the result of updating the Standard Method calculation using ONS's 2018-based projections?

The increases in population tend to be partly offset by negative net internal migration, ie people moving outside the Crawley boundary (the early years of the financial crisis were an exception). The net outflow from Crawley has been around 400 households on average over the past five years, and this has fed into the ONS's 2018-based projections, ie it is assumed this rate of outflow will continue, lowering overall population increase. The 2014-based projections will have used an outflow of around 100 a year, resulting in higher estimates of population growth.

Why have net outflows of people increased? This is quite possibly due to the increased availability of new housing as new developments are built out in Crawley and by neighbouring LPAs. Completion rates took off post the financial crisis when the Bank of England and Treasury introduced various stimuli which boosted demand and building, including Help to Buy in 2012. For example, by 2016 Horsham was averaging 1,000 completions a year compared to the average of 500 pre-crisis.

So, ONS data show that in 2019 the net migration from Crawley to Horsham was around 250 households. And Horsham's population is increasing at a rapid (unsustainable) rate driven by house-building – 75% of the increase in dwelling stock corresponds to the net migration into the district, ie 660 households a year (we can't say these households are occupying the new houses, but we can see the relationship between the growth in both houses and households). See orange bars and red line in Chart 3.

The really important thing is that this increased flow from Crawley to Horsham is now in the ONS's population data, since 2016, and will have influenced the 2018-based projections, and will do the same for future sets of projections. Hence Crawley's lower projected figure of 277 in the table above, and Horsham's correspondingly higher figures.

¹ Of course current births or deaths do not necessarily lead to immediate changes in household numbers. But the ONS, and by extension DLUCH, assumes as much.

This means that the flow from Crawley to Horsham (of around 250) is assumed to continue and is already 'baked in' to the projections and the OAN calculations. This can be viewed as **a DTC of 200 a year having become embedded in the local population and housing dynamics.**

Crucially, if both LPAs calculate their housing needs using the Standard Method And since Crawley can meet a need of 360 houses a year, there is no need for Horsham to provide any housing via a DTC arrangement, unless both

	OAN using 2014-based projections	OAN using 2018-based projections	Bottom-up approach
Crawley	750	360	700
Horsham	950	1,200	600
TOTAL	1,700	1,560	1,300
DTC	Not needed – Horsham’s OAN already hugely over-stated – will deliver excess housing in any case.	Not needed – already embedded into ONS projections, and so in Horsham’s OAN.	Needed , unless Crawley can find alternative way to increase delivery

Chart 2: Components of Crawley’s population (households) change since 2001.

Bright blue bars show births exceed deaths by around 300 a year. Grey bars show international migration (net). Orange bars show net migration out of Crawley into other parts of the UK. And the red line is housing delivery.

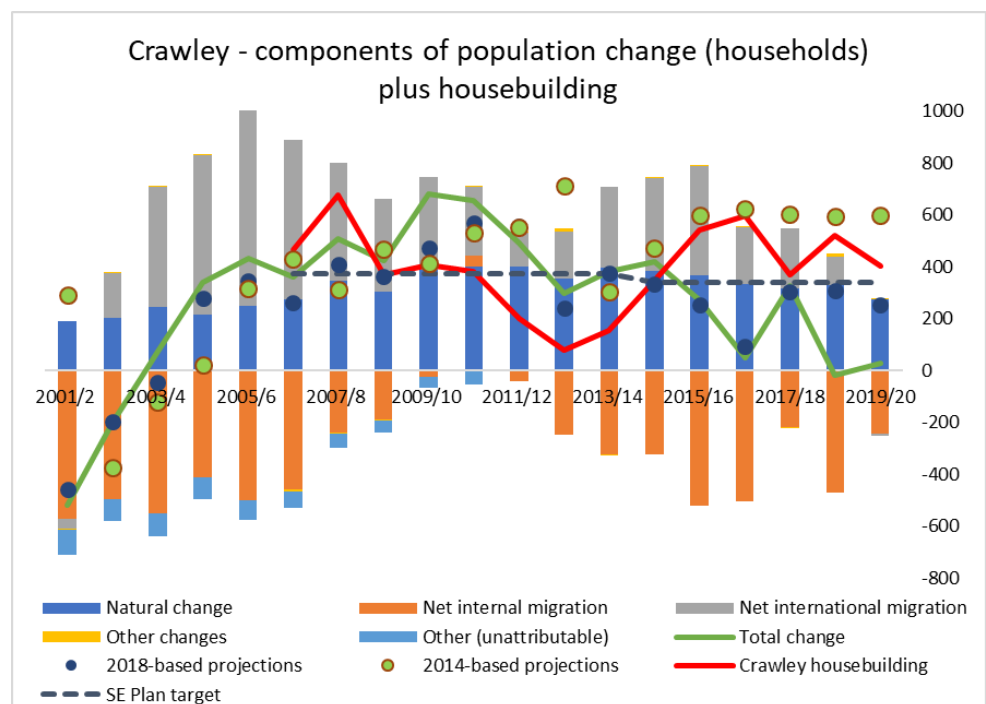
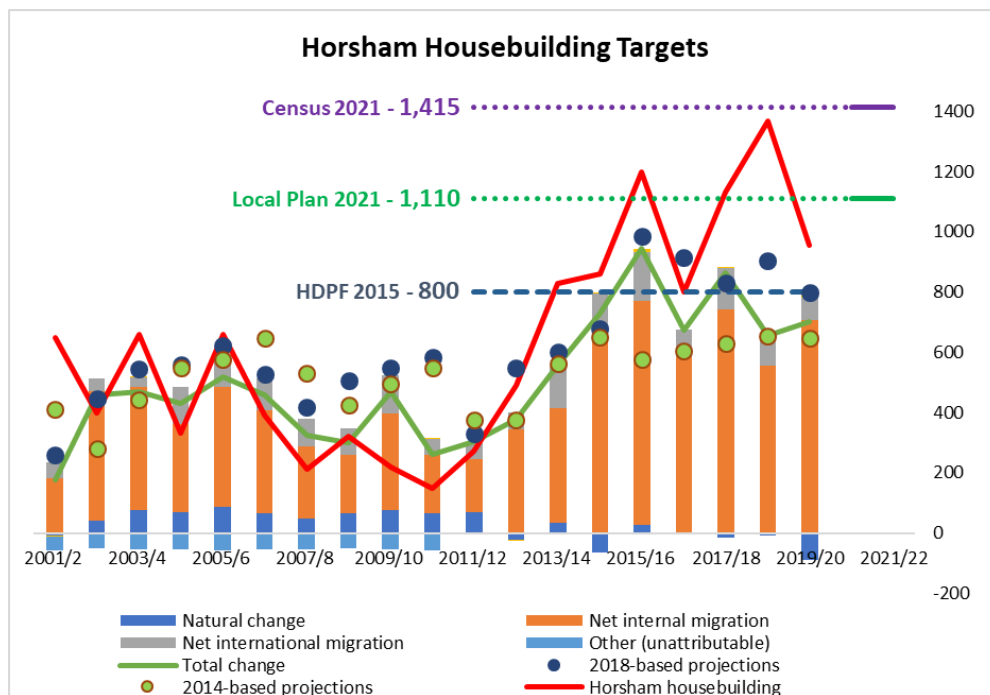


Chart 3: Components of Horsham’s population (households) change since 2001.

Dominated by the orange bars, ie population growth almost entirely driven by net migration into Horsham from other parts of the UK – mainly Crawley, Surrey and south London.

Also note housing delivery averaging 1,000 a year since 2014, in excess of current target of 800.



Page 155 – para 12.1

The population of Crawley has been rising significantly over the past three decades, increasing by about 22% from 88,750 in 1991 to 106,600 in 2011. ... Crawley's population was expected to grow by over 16% over the period 2019-2039 to reach 135,262 residents.

Crawley's population grew by 11.2% in the 10 years between the 2011 and 2021 ONS censuses, the second highest of any local authority (LA) in Sussex or Surrey – only Horsham grew more quickly – and almost double the rate for England and Wales overall of 6.3%. Crawley's growth is also higher than all but four LAs in Kent with the exception of Dartford, Maidstone, Ashford and Swale. See Table 1 for list of all LAs.

How can this rate of growth be sustainable given the shortage of water in the south-east region, the inability of water companies to treat sewage safely, and the failure of developers and LAs to deliver the necessary infrastructure? And how does this rate of growth fit with the Council's 30-year vision?

Table 1: Population change between 2011 and 2021, local authorities in Sussex, Surrey and Kent

LA name	Usual resident population, 2011	Usual resident population, 2021	Percentage change
Dartford	97,365	116,800	20.0
Maidstone	155,143	175,800	13.3
Ashford	117,956	132,700	12.5
Horsham	131,301	146,800	11.8
Swale	135,835	151,700	11.7
Crawley	106,597	118,500	11.2
Arun	149,518	164,800	10.2
Reigate and Banstead	137,835	150,900	9.5
Tonbridge and Malling	120,805	132,200	9.4
Runnymede	80,510	88,100	9.4
Chichester	113,794	124,100	9.1
Mid Sussex	139,860	152,600	9.1
Epsom and Ewell	75,102	80,900	7.7
Spelthorne	95,598	103,000	7.7
Wealden	148,915	160,100	7.5
Worthing	104,640	111,400	6.5
Elmbridge	130,875	138,800	6.1
Tandridge	82,998	87,900	5.9
Waverley	121,572	128,200	5.5
Adur	61,182	64,500	5.4
Gravesham	101,720	106,900	5.1
Surrey Heath	86,144	90,500	5.1
Sevenoaks	114,893	120,500	4.9
Thanet	134,186	140,600	4.8
Guildford	137,183	143,600	4.7
Woking	99,198	103,900	4.7
Dover	111,674	116,400	4.2
Canterbury	151,145	157,400	4.1
Rother	90,588	93,100	2.8
Lewes	97,502	99,900	2.5
Mole Valley	85,375	87,400	2.4
Eastbourne	99,412	101,700	2.3
Folkestone and Hythe	107,969	109,800	1.7
Brighton and Hove	273,369	277,200	1.4
Hastings	90,254	91,100	0.9
Tunbridge Wells	115,049	115,300	0.2

Source: Office for National Statistics – Census 2021

Page 172 – para 12.66 – 8. Policy H3a – estate regeneration

12.67 At this stage, there are no estate regeneration projects planned in Crawley. ...

Topic Paper 4: Housing Supply

3.8.1 ... No significant estate regeneration schemes have as yet been proposed by the council and any potential schemes which may emerge are likely to take time owing to the complexity of this kind of development. At the same time, this type of approach is expected to become increasingly relevant as part of the wider national and local agenda on densification, and is given specific support in national policy.

3.8.2 In light of this and as noted in section 3.3 above, Estate Regeneration is one of the potential forms of residential development for which provision is made as part of the ‘typology’ approach set out in draft Local Plan policies H3 and H3a-f. Policy H3a thus sets out specific requirements for this form of development in terms of the need for a comprehensive masterplan approach; the importance of balancing efficient use of land with residential amenity and open space requirements; and the engagement of local communities and affected individuals

This lack of commitment to estate regeneration is disappointing, given Crawley’s inability to meet its housing need. While it is acknowledged that estate regeneration will become increasingly relevant, as part of a move towards greater densification, there doesn’t appear to be a recognised need to start planning for this. Neighbouring LPAs who are pressed to provide housing for Crawley might reasonably ask why.

Page 172 – para 12.69. Policy H3b – estate regeneration

12.67 At this stage, there are no estate regeneration projects planned in Crawley. ...

Topic Paper 4: Housing Supply – para 2.4.13

*2. 4.13 The Local Plan approach to **Densification** and Urban Form is supported by the Crawley Densification Study. The densification study has been prepared to support the Local Plan approach in responding to the emphasis placed on the effective use of land in the NPPF. It identifies the potential for achievement of increased densities and a more compact form of development within the borough, particularly in certain areas, and the potential for this to deliver wider benefits in terms of wellbeing and climate change, provided that this is undertaken in a way which responds to existing character and incorporates high standards of design.*

The CBC Densification Study is very ‘draft’. It is incomplete and inconclusive – in particular it doesn’t quantify the potential impact of any densification scenarios. [*Draft Densification Study Part 1 \(January 2021\)*](#)

Policy H3b is very general and focussed on infill, small sites and windfall opportunities, rather than providing a sense of any strategic intention to use densification to address Crawley’s inability to meet its housing need. Neighbouring LPAs who are pressed to provide housing for Crawley might reasonably ask why.

This point had been made by the Planning Inspector in 2015. In para 96 of their 2015 Report they said: ‘Not only are the external space standards of policy CH5 unnecessarily prescriptive, they are also unduly onerous. At the hearings the Council was unable to convince me that, for example, a typical 3-bed 5 person terraced house requires 90 sq m of private amenity space if it is to satisfy the ‘good design’ requirement of NPPF. **In an urban borough where there is insufficient land to meet about half the housing need, there is a real risk that the Council’s space standards militate against innovative housing layouts which could increase densities whilst still delivering high quality residential environments’**

How have their points been addressed in this latest draft Plan?

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.**

Both Ifield Brook Wood and Meadows and Willoughby Fields are identified specifically as designated Local Wildlife Sites (formerly SNCI's).

Both of these sites are at risk from proposals for West of Ifield development and clarity is needed in these policies to make it clear that no development can take place on these sites including the Western Link Road and/or other transport infrastructure.

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)**

- 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.**

The Local Plan recognises the potential impact of development and noise on health but fails to identify how this will be monitored and controlled (Page 232 Para. 16.31). This will be a major issue for Crawley residents in Ifield if the West of Ifield development goes ahead because construction traffic will have to use the existing road network to access the site with a consequent impact on local residents health and well being.

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

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.*

The Local Plan (Page 236 16:44) makes clear CBC's responsibility for air quality and its potential impact on health but is short on the detail on how this is to be achieved and monitored. Save West of field believes that a more robust approach is required given the proximity to Gatwick Airport.

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***

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: 17.1

Policy: Sustainable Transport

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.**

In order to provide additional facilities and services for new development that is adjacent to Crawley's boundaries it will be necessary to require additional provision within Crawley's boundaries. This will be needed to improve existing capacity, to extend provision of the Cycleway network and to upgrade facilities including junctions, accessibility and usability.

This requirement is not covered within the draft Local Plan. It will be difficult to obtain these items without inclusion within the Local Plan resulting in further development on Crawley's boundaries not providing these facilities to the detriment of the existing population.

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:**

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:

ST1 development and requirements for Sustainable Transport

Other:

5. Do you consider the Local Plan to be: *(Please tick)*

5.1. Legally compliant? Yes No

5.2. Sound? Yes No

5.3. Compliant with the duty to co-operate? Yes No

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.**

Strategic Policy ST1 refers to the necessity for 'Designing developments to prioritise the needs of pedestrians, cyclists and users of public transport over ease of access by the motorist'.

Paragraph 17.1 refers to 'the provision of additional facilities and services'.

But in order to meet these policy objectives it would be necessary to significantly improve elements of the existing transport infrastructure in Crawley in order to enable this objective.

This will include all active travel corridors to/from the site to the relevant trip attractors in Crawley like Gatwick, Manor Royal, Town Centre etc.

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