

Ms Elizabeth Brigden
By email

Nichola Watters
Head Of Planning Policy,
Economy & Climate Change

Dear Ms Brigden,

Wealden District Council Response to Crawley Borough Submission draft Local Plan 2024 – 2040 (Regulation 19)

Thank you for your invitation to make a representation on the Crawley Borough Council Local Plan Consultation Draft (Spring 2023) under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended that has been published for a six-week period between Tuesday 9 May until Tuesday 20 June 2023.

The officer comments below have been endorsed by the Cabinet Member for Planning and Development.

Strategic Housing Matters

We note that the draft Crawley Borough Council Local Plan sets out a local housing need figure calculated via the ‘standard method’ under the National Planning Policy Framework (NPPF) of 755 dwellings per annum (dpa) equating to 12,080 homes over the Local Plan period (2024-2040). The draft Crawley Borough Council Local Plan at Strategic Policy H1: Housing Provision, identifies housing sites to deliver a minimum of 5,030 (net) dwellings in the administrative boundary of the borough (this equates to 42% of its housing need), meaning there will be an unmet housing need of approximately 7,050 dwellings, arising from Crawley over the Plan period. The policy goes on to state that:

‘the council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley’.



At this stage, it is not clear from the draft Crawley Borough Council Local Plan as to how it may address this issue of unmet housing need and how any identified unmet housing needs might be met across the wider sub-region. This issue is defined clearly within paragraph 26 of the NPPF and states that joint working should help determine whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

Paragraphs 12.17 to 12.23 of the draft Crawley Borough Council Local Plan does outline potential key considerations for urban extensions at Crawley and the criteria for when such extensions would be supported. It is noted that such extensions will likely be outside of Crawley Borough Council (CBC) administrative area and will therefore be subject to further discussion with neighbouring local planning authorities, particularly Horsham District Council and Mid Sussex District Council who also form part of the Northern West Sussex Housing Market Area (HMA).

WDC supports Strategic Policy H1: Housing Provision in that it confirms that the Council will continue to work closely with its 'neighbouring authorities', particularly those that form the Northern West Sussex HMA, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations, including urban extensions to Crawley. WDC agrees that this is likely to be the most sustainable and appropriate option to meet this unmet housing need, given the services and facilities in the town, as well as sustainable modes of transport (including rail) that exist within the urban area.

However, on the 14 April 2023, CBC did send a letter to WDC that set out a formal request as to whether WDC could accommodate some, or all of CBCs unmet housing needs, which amounts to 7,050 dwellings over the proposed Plan period (2024 – 2040) as outlined within draft Crawley Borough Council Local Plan under Strategic Policy H1: Housing Provision. WDC has responded to this letter in full, which is submitted alongside this formal response to the Regulation 19 consultation, but the following issues have been identified by WDC as factors as to why the local planning authority cannot meet the unmet housing needs of CBC at this stage.

Housing Market Area (HMA)

The latest Local Housing Needs Assessment (LHNA)¹ for Wealden concludes that Wealden District is overlapped by a number of different HMAs, which cross and fall within the district boundary in several locations. In terms of the LHNA conclusions, it is only suggested that a small, predominantly rural part of Wealden (incorporating Forest Row) to the northwest of the district overlaps with the Northern West Sussex HMA and this HMA only incorporates 6% of Wealden's own population or around 2% of the overall HMA population.

The latest information on the HMA for Crawley Borough Council was identified in the Northern West Sussex Strategic Housing Market Assessment (November, 2019)² document and confirms that evidence continues to support the definition of a

¹ [Wealden Local Housing Needs Assessment. August 2021.](#)

² [Northern West Sussex Strategic Housing Market Assessment \(November, 2019\)](#)

Northern West Sussex HMA which is comprised, as a best fit to local authority boundaries, of Crawley, Horsham and Mid Sussex. It is recognised however that there is some evidence of an overlap with other local authorities, albeit Wealden is not specifically defined in this study, and this more relates to Surrey authorities to the north and the Coastal West Sussex HMA (that incorporates parts of Lewes District and Mid Sussex District) to the south.

Given the above, the evidence shows a limited interaction between Wealden District and Crawley Borough in terms of those linkages. In addition, the administrative boundary of CBC is not shared with that of WDC and it is considered that the linkages shown in Wealden's LHNA with the Northern West Sussex HMA are likely to stem from Mid Sussex District (particularly, East Grinstead) rather than Crawley.

As noted above, the overlap with Northern West Sussex HMA in Wealden is limited to a rural area that incorporates Forest Row, and whilst not wishing to pre-empt the Local Plan process, it is considered that there will likely be only very limited opportunities for further growth, given the constraints in that location that includes the High Weald AONB, flood risk and the Ashdown Forest SPA. The growth of other sustainable settlements within the south of Wealden District, such as Uckfield, Hailsham or other settlements on the outskirts of Eastbourne all fall outside of the Northern West Sussex HMA. Given this, any growth in these locations are unlikely to fulfil the housing needs of CBC specifically.

Sustainability of New Development

Paragraph 73 of the NPPF (July, 2021) states that 'the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)'. Paragraph 105 of the NPPF (July, 2021) states that 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'. Given our comments earlier regarding the constraints of Forest Row (which is located within the Northern West Sussex HMA), it is considered, on sustainability grounds alone, it would be better to address unmet development needs of CBC within and/or adjacent to large regional centres such as Crawley, where jobs, sustainable transport links and retail are largely located. This would be in line with national planning policy on this matter. Substantial development away from these areas, particularly within the High Weald AONB designation, in a rural area, would be considerably less sustainable and may exacerbate existing out-commuting patterns from Wealden District.

Infrastructure

WDC, as part of its local plan process will also need to consider its existing infrastructure constraints and to test how and where we can accommodate growth, including the strategic road network. It is not yet known whether WDCs own

development needs can be met through its existing infrastructure and/or what new infrastructure is required to deliver growth in the longer term.

As part of our local plan production, we are working with East Sussex County Council and other local authority partners (Eastbourne, Rother, the South Downs National Park Authority, Lewes and Hastings) to test growth options, specifically in relation to existing road networks. A countywide transport model is currently being devised for this purpose. We will also need to consider as part of our growth strategy whether an offline A27 is required to support growth. RIS2 was published in March 2020 and identifies further work that will be undertaken in order to progress developing proposals for the A27 between Lewes and Polegate as a potential pipeline scheme for construction between 2025 and 2030. We will need further clarification as to the potential of this scheme in order to inform housing delivery and options for delivery. In the meantime, we are waiting to hear the outcome of a Major Road Network (MRN) bid to support the delivery of a number of junction improvements for the A22/A27 to facilitate growth. We hope to know more on this shortly.

Conclusion

Turning to the specific request, WDC is clear that given the geography of the Northern West Sussex HMA and the physical distance from Crawley, the options for WDC to take some or all of this unmet housing need would be less sustainable than the alternative of delivering this growth either within the CBC area or its adjoining authorities. Put simply, any solution would either be to build in a rural part of Wealden District in an unsustainable location, within the High Weald AONB, or to seek to build outside the small, shared element of the HMA, thereby not meeting the needs of CBC residents.

Strategic Employment Matters

It is noted that Strategic Policy EC1: Sustainable Economic Growth of the draft Crawley Borough Council Local Plan confirms that there is need for a minimum of 26.2 hectares of new business land in the borough over the Plan period, which will be partly be met by opportunities identified in the Council's Employment Land Trajectory and a new allocation under Strategic Policy EC4: Strategic Employment Location, referred to as Gatwick Green, that will provide a minimum of 13.73 hectares of new industrial land (predominantly Use Class B8). If the new allocation proceeds, CBC will be able meet its identified employment floorspace needs in full. This is fully supported by WDC and will make the best use of existing brownfield sites (with the exception of 'Gatwick Green') within a sustainable town and will ensure that residents within the town have further opportunities to work in close proximity to where they live, reducing the need to travel.

I trust that the above the comments are helpful at this stage. If you have any further queries, then please do not hesitate to contact us.

Yours faithfully

A handwritten signature in black ink, appearing to read 'NW', with a horizontal line drawn through the middle of the letters.

Nichola Watters

Head of Planning Policy, Economy and Climate Change