

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

If calling please ask for: **Tony Whitty**

Our ref:

Your ref:

19 June 2023

Dear Sir/Madam

Crawley Local Plan Review - Regulation 19 and response to Duty to Cooperate request

Thank you for consulting Chichester District Council (CDC) on the Regulation 19 Crawley Borough Submission draft Local Plan 2024 - 2040, published 9 May 2023. This letter sets out our formal response to the consultation, and our formal response to your request (14 April 2023) that CDC consider assisting Crawley Borough Council (CBC) in addressing unmet development needs under the Duty to Cooperate provisions of 7,050 dwellings and particular housing types needed to meet the needs of specific communities.

In our 7 March 2021 response to the January 2021 Regulation 19 consultation, we:

- welcomed the continued recognition given to the ongoing work of the West Sussex and Greater Brighton Strategic Planning Board in addressing cross-boundary and sub-regional matters to ensure that the strategic development and infrastructure needs of the overall area are met as far as possible within the context of the provision of the National Planning Policy Framework (NPPF) (as set out in Topic Paper 1: Unmet needs and Duty to Cooperate).
- noted the position of Crawley Borough Council (CBC) as being unable to meet its OAHN and that CBC needs to look to other authorities in the wider area.
- recognised that there was a significant shortfall over the plan period of 6,680 dwellings, as a result of 5,320 dwellings being the maximum which could sustainably be delivered at that time.
- set out that we would encourage CBC to further investigate all potential opportunities to increase housing provision within its plan area to ensure that no

stone is left unturned by the Council in maximising the potential of the existing urban areas to regenerate and be intensified, where appropriate to do so.

- committed to continuing to engage constructively, actively and on an ongoing basis with other local authorities and organisations to address sub-regional issues, including through the West Sussex and Greater Brighton Strategic Planning Board.

In response to the Regulation 19 Crawley Borough Submission draft Local Plan 2024 - 2040, published 9 May 2023, CDC:

- understands that the objectively assessed housing needs figure for CBC is 12,080 dwellings (755 dpa) and that the draft Local Plan provides for 5,030 dwellings (314dpa), which results in an unmet need of 7,050 dwellings (as set out in Table 1 of Topic Paper 1: Unmet Needs and Duty to Cooperate, May 2023). This also results in an unmet affordable housing need of 9,812 dwellings (613 dpa) and an unquantified potential unmet need for self and custom build housing.
- recognises the additional work that has been carried out to seek additional sites and to reassess sites as well as density levels.
- supports the recognition in Policy H1 and paragraph 12.38 that the supply figure is a minimum.
- supports paragraph 1.31 which recognises the ongoing role of the West Sussex and Greater Brighton Strategic Planning Board in discussing strategic issues (including the preparation of the Local Strategic Statement) and the partnership working to resolve the water supply constraint to development within the Sussex North Water Resource Zone.
- supports the approach to housing provision set out in Policy H1 and the commitment to continue to work closely with neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area to explore opportunities for meeting unmet need. CDC agree that the Northern West Sussex Housing Market Area authorities are best placed to fulfil this role.
- supports the introduction of high-density targets for the Town Centre and accessible locations (Policy CL4) and the housing typology policies (Policy H3, H3a – H3f) which will help to maximise capacity and positively influence development opportunities.
- supports the acknowledgement in paragraphs 12.17 – 12.23 of the draft Local Plan that, in the longer term, well planned urban extensions could form an important way to meet Crawley's unmet housing needs, through informing discussions with neighbouring authorities within the Northern West Sussex Housing Market Area.

- supports the approach taken to water neutrality and Policy SDC4 Water Neutrality. This has resulted from joint working by Chichester District Council, Horsham District Council and Crawley Borough Council to produce technical evidence to support the approach. We will welcome continued joint working with CBC on the delivery of the implementation scheme to ensure proposed new development demonstrates water neutrality and meets the requirements of the Habitats Regulations.

In response to your Duty to Cooperate request dated 14 April 2023:

- CDC recently published our Proposed Submission Local Plan 2021 – 2039 for Regulation 19 consultation. The position set out in the Plan is that following the completion of evidence work, we will be providing a supply of 575dpa; a total of 10,350 dwellings over the plan period. This is below our objectively assessed need figure of 638dpa due to the significant constraint of A27 junction capacity. Therefore, CDC are also generating an unmet housing need which we have been engaging with neighbouring authorities on under the Duty to Cooperate. This also means that we are unable to assist the South Downs National Park Authority with their unmet needs (arising from the part of the SDNP within Chichester District) as was previously proposed in the Preferred Approach draft of the Local Plan (2018).
- As a result of not being able to meet our own needs, we cannot agree to meet any unmet needs arising from Crawley Borough currently. If we were able to take unmet need, we would first have to consider assisting authority areas more directly related to the Chichester Plan area, particularly the South Downs National Park Authority.
- Similarly, like CBC, CDC will have an unmet affordable housing need over the plan period, compounded by pressures on the viability, which restrict the affordable housing thresholds which can be required in relation to new development. Consequently, CDC is not able to accommodate any unmet affordable housing need from neighbouring authorities.
- In relation to self and custom build, CDC is proposing to make provision for those on its register with a preference to live in the plan area via requirements to provide plots on the strategic housing allocations. However, these will be primarily around Chichester and hence unlikely to be suitable for self-builders on CBC register owing to the geographical separation. There is the possibility that some opportunities will become available via neighbourhood planning in the northern part of the CDC plan area, though it is presumed that this will be focused on local needs, and hence it is presumed that there will be no scope to formally meet the needs from elsewhere via this process. Nevertheless, there may be the potential

for some plots to become available on an ad hoc basis, but it is unlikely that the CDC can commit to accommodating a specific level of self and custom build need from CBC.

If you have any queries concerning this letter, please do not hesitate to contact me or Claire Potts, Planning Policy Team Manager (cpotts@chichester.gov.uk).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Tony Whitty', with a stylized flourish at the end.

Tony Whitty
Divisional Manager Planning Policy