

# SMB

## TOWN PLANNING LTD

Suite 10 Compass Close, Edgware, Middlesex HA8 8HU  
T: 020 3322 6890 [www.smbtownplanning.co.uk](http://www.smbtownplanning.co.uk)

### CRAWLEY LOCAL PLAN EXAMINATION

#### STATEMENT ON BEHALF OF OXFORD MATCH LIMITED IN CONNECTION WITH THE FOLLOWING:

- **MATTER 6 ISSUE 2 – SECURING HOUSING MIX**
- **MATTER 6 ISSUE 4 – HOUSING LAND SUPPLY**
- **MATTER 7 – ISSUE 1 CRAWLEY TOWN CENTRE - OVERALL APPROACH**
- **MATTER 8 ISSUE 3 – WHETHER THE PLAN’S APPROACH TO HERITAGE MATTERS IS SOUND**

1. These representations on behalf of Oxford Match Limited have been submitted in response to the Inspector’s request for further written statements on questions identified in the Schedule of Matters, Issues & Questions for the Hearing Sessions January 2024.
2. This comprehensive statement relates to the four matters and issues identified above on the basis that they are inter-related to our client’s interests in Crawley town centre.
3. We have where appropriate referred to the question numbers raised by the Inspector.
4. This Statement should also be read within the context of those submitted by other representors.
5. Our client owns the property comprising nos. 1 – 5 Queensway and 48 – 52 The Boulevard. The property is located within Crawley Town Centre and is within the recently designated (2 November 2022) the Queens Square and The Broadway Conservation Area
6. Representations were submitted on behalf of Oxford Match Limited in response to the Crawley Local Plan 2021 - 2037 Submission Draft in June 2021 and to the Draft Crawley Local Plan 2024-2040 (May 2023) Submission Public Consultation in June 2023.
7. In the first of these two representations we welcomed the draft town centre policies which were generally supportive of the principle of, inter alia, development comprising the conversion of the upper floors of existing properties for residential use together with appropriate upward extensions of buildings to provide additional dwellings. We stressed the importance of windfall sites coming forward to assist the Council meeting their housing needs and housing requirements. We cautioned against policies being too prescriptive in terms of meeting affordable housing criteria and elements of design that may well work against the provision of town centre residential development on windfall sites.



8. In the representations submitted in June 2023 to the version of the Local Plan that is the subject of these Examination Hearings, we stated that taken together draft policies EC1, EC2, TC1 to TC5, H2, and H3c are generally supportive of the principle of the proposed development comprising the conversion / redevelopment / upward extension of the upper floors of properties within the defined town centre for residential use with the ground floor being retained for Class E uses (Commercial, Business and Service).
9. We emphasised that the provision of additional dwellings on windfall sites is critical to the Council where they are heavily reliant on neighbouring local planning authorities in meeting the identified housing need (58%) over the period of the Local Plan.
10. The draft Local Plan expects 1,598 new dwellings to come from windfall sites (100 dwellings per annum). Whilst this “allowance” represents an increase from 55 dwellings per annum from the adopted Local Plan (2015) we have a number of reservations given that windfall sites are part of the housing supply source within Crawley in general and the town centre in particular which is now a “neighbourhood”.
11. Firstly, requiring three-bedroom properties in town centre locations in car-free developments are unlikely to be attractive to families and may well result in marketing difficulties. With this knowledge, housebuilders and developers may well be reluctant to provide for three-bedroom dwellings in such locations. We do however note that draft Policy H4 which requires all housing development to provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand, dependent upon the characteristics of the site (our underlining for emphasis). The draft policy also contains a “Housing Mix Test” which in our view is prescriptive and potentially conflicts with the “characteristics of the site” in town centre locations where paragraph 3.16 of the Draft Plan states that *“family accommodation, in accordance with Policy H3c .....may not necessarily be suitable for all sites.”*
12. Secondly, the table under paragraph 13.14 indicates the provision of 30% of the market housing element on town centre sites should be Family Homes (25% 3-bedrooms and 5% 4-plus-bedrooms). In addition, the table indicates that the affordable rental element to be provided should be 25 - 30% for 3-bedrooms and 5 - 10% for 4-plus bedrooms. This seems to be excessive especially for a flatted town centre development and may have the adverse effect of reducing the viability of town centre schemes and consequently may well materially alter the affordable housing provision.
13. Thirdly, Policy DD3 as drafted will not make the most efficient use of deliverable land, particularly constrained town centre sites that could easily contribute to the housing requirements as windfall.
14. Given the above, the town centre is a location that could meet (in part at least) the needs for younger households forming in Crawley and the policies need to reflect this (Q.6.14).
15. Crawley, like other LPAs in the Home Counties faces a challenging situation in bringing forward development and windfall sites to meet housing demand, particularly where the general needs for housing are pressing. The actual number of dwellings including affordable housing that are delivered will be determined by financial viability. The Council’s target of 25% affordable on town centre sites will not always be achievable. An important consideration in Local Plan formulation and development management is the fact where sites are allocated or come forward as windfall for housing is that the

proposed dwellings will be occupied by people. Dealing with housing numbers can obscure this. The Council are struggling to meet their housing requirements. Crawley are heavily reliant on neighbouring local planning authorities to assist in meeting the identified housing need (58%) over the period of the Local Plan. This translates into the fact that the housing needs of many people may not be met in the short to medium term. There is a need for the Plan to make effective use of land within the Borough in order to support positive housing delivery and potential supply from windfall sites. In the case of Crawley there is compelling evidence to make allowance for windfall housing having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. The windfall figure of 100 dwellings per annum should be increased at least to reflect the Inspector's direction at the Examination Hearings on 21 November 2023 which extended the plan period by a year to be reflected in proposed revisions to Policy H1 (Q.6.29).

16. The Council recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites identified in Policy TC3. Much of the Town Centre is now designated a Conservation Area. All of the allocated sites under Policy TC3 are outside of the Conservation Area. This does not preclude development per se but there has been no provision made for other sites that may come forward during the plan period within the Conservation Area (Q.7.3).
  
17. For the heritage matters in the plan to be sound (Matter 8 Issue 3), the Council should be looking for opportunities for new development within the Queen Square and The Broadway Conservation Area as per paragraph 206 of the NPPF, particularly in light of the housing need and requirements of Crawley during the plan period.