

Home Builders Federation

Matter 1

CRAWLEY LOCAL PLAN 2024-2040 EXAMINATION

Matter 1: Legal Compliance and General Plan-making

Issue 2: Duty to Co-operate

1.6 What mechanisms have been established between authorities on cross-boundary strategic matters? Do the signed statements of common ground demonstrate effective and on-going joint working, as per NPPF paragraphs 26 and 27 and PPG paragraphs 61-009-20190315 to 61-017-20190315?

The HBF welcomes the additional evidence has now been published by the Council with regard to the duty to co-operate. However, the HBF do not consider the statements of common ground (SoCG), in particular with the neighbouring Council's to the north of Crawley (Mole Valley, Tandridge and Reigate and Banstead) shows that co-operation has been effective. The statements of common ground with those Local Planning Authorities provide no evidence of joint working that seeks in any way to address the issue of Crawley's unmet housing needs, they merely state that no help can be provided and do not set out whether any real consideration as to the issue of Crawley's unmet needs and how these could be addressed. Whilst appendix K provides evidence as to recent discussion there appears to have been no engagement with authorities that are not part of the North-West Sussex Housing Market Area (NWS HMA) to discuss Crawley's unmet needs since the SoCGs were signed in 2021. Furthermore Table 3.2 in the duty to co-operate statement (KD/DtC/01a), which provides a provides summary of activities and engagement does not provide any indication of direct discussions with these authorities. The only engagement appears to have been written correspondence at the point of consultation on the local plan and not during the preparation of the plan itself.

Given that Section 110 of the Localism Act 2012 states that LPAs are required "to engage constructively, actively and on an ongoing basis" with regard to local plan preparation the HBF would question whether the duty to co-operate has been properly fulfilled by the Council in relation to its unmet housing needs. The mechanism for addressing unmet needs in neighbouring areas appear to have been applied solely to those authorities that are within the NWS HMA. Whilst this may have been sufficient



for the previous plan where unmet needs were being addressed within the HMA this is not the case for this local plan and wider more in-depth co-operation was required.

However, the HBF recognises that Crawley cannot force other LPAs to co-operate with them and even where joint working has been more consistent over the course of preparing this local plan it has failed to deliver any agreement with regard to Crawley's unmet housing needs. Those LPAs neighbouring Crawley have clearly decided that they cannot help and are unwilling to work strategically to address the issue of unmet needs. As such the fault may not lie with Crawley but with its neighbours. However, moving forward the Council will need to be more robust in its challenge of its neighbouring LPAs and how they can increase supply to meet Crawley unmet housing needs. As such the statement in policy H1 that the Council will continue to work closely with its neighbours is too weak. The Council will not just need to work with its neighbours but to actively challenge them with regard to meeting their housing needs. The HBF would suggest that this is amended to state:

“The Council will work to ensure that Crawley’s unmet housing needs are delivered within neighbouring areas. A particular focus will be given to meeting needs in the Northern West Sussex HMA, but the Council will also challenge other neighbouring authorities with regard to addressing its unmet need for housing in full.”

1.7 Given past unmet needs arising in Crawley and the fact that significant unmet needs have again arisen for this Plan, has any consideration been given to a wider planning strategy or joint evidence base within the Housing Market Area (HMA) as a mechanism to collaboratively test the extent to which housing needs (and associated infrastructure issues) within the wider HMA could be addressed across administrative boundaries to secure a sustainable pattern of development?

This is for the council to answer but a more concerted effort to consider the cross-boundary issue of unmet housing needs could have resulted in a more positive outcome. The approach taken by all the Council's in the area was minimal and never likely to be effective in addressing the issue of Crawley's unmet housing needs.

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