

**Crawley Local Plan 2024 - 2040 Examination -  
Matter 2: Spatial Strategy**  
Statement on behalf of A2Dominion

October 2023

**Turley**

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**Client**

A2 Dominion Group

**Our reference**

A2DS3001

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# 1. Introduction

- 1.1 This Statement has been prepared by Turley on behalf of A2Dominion in relation to Matter 2 (Spatial Strategy) of the Examination into the Crawley Local Plan 2024 – 2040.
- 1.2 A2Dominion are promoting land to the south of Crawley to the west of Pease Pottage which is located partly within Mid Sussex District and partly within Horsham District for residential-led development.
- 1.3 The land promoted by A2Dominion has the potential to provide a meaningful contribution to accommodating housing to serve the unmet needs of Crawley in a location adjacent to where they arise.
- 1.4 A2Dominion's involvement in this Examination is solely in relation to the matter of the unmet housing needs of Crawley and the manner in which this issue is addressed in the draft Plan.

## 2. Matter 2: Spatial Strategy

### Issue 2: Whether the Plan is justified and effective in relation to the prospect of development adjacent to Crawley.

#### 2.5 Is the plan sufficiently flexible and sensitive to potential options for growth 'At Crawley' that may occur in Horsham and Mid Sussex districts? Would plan review be an appropriate mechanism if strategic growth around Crawley was determined to be a sound spatial strategy for neighbouring authorities?

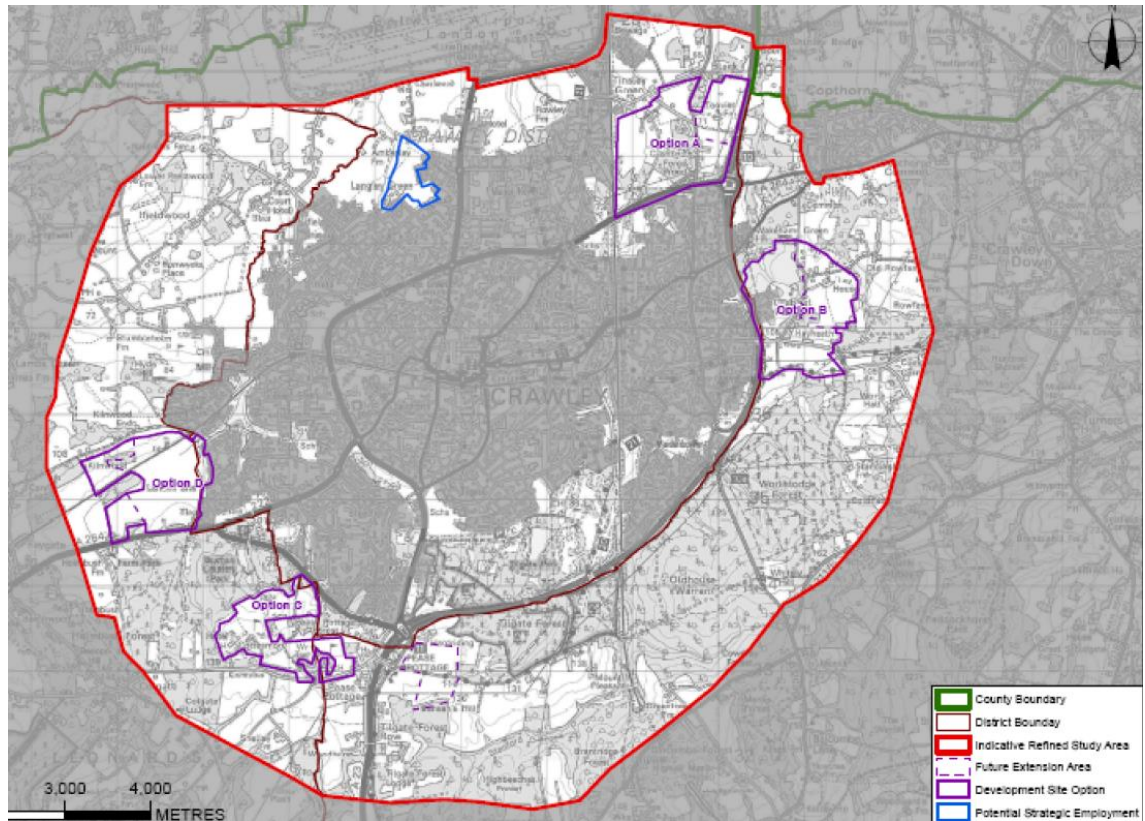
- 2.1 We do not see the merit of a Plan-review in these circumstances. If the Plans for any adjoining authority directs strategic growth around Crawley, then it is for the evidence base to demonstrate that this represents an appropriate strategy and is sound (depending on the policy context at the time).
- 2.2 These are not particularly unique circumstances, and, in our view, do not result in the need for the Crawley Local Plan to be reviewed.
- 2.3 As we explain in our Statement for Matter 1, the Local Plan for Crawley should not predetermine how unmet need should be addressed by adjoining local authorities (Horsham District and Mid Sussex District).
- 2.4 It is entirely appropriate that the draft Local Plan recognises the extent of the unmet need (and we urge the Inspector to reach a very clear conclusion on that topic to guide other authorities). It is also entirely positive that the draft Local Plan sets out circumstances where such development 'at Crawley' but outside of the administrative boundary could be supported.
- 2.5 The reason why this Plan should not predetermine the outcome of others is reflected in the 'Northern West Sussex Statement of Common Ground: July 2023' as this includes (at section 6) an indication of the Local Plan timetables. Clearly the Plans for Mid Sussex and (in particular) Horsham Districts are running behind that for Crawley Borough.
- 2.6 However, paragraph 2.32 of the draft Local Plan states:
- "2.32 Other potential urban extensions to Crawley may include extensions to the east and/or west of the borough boundary. All opportunities are being explored to understand whether these would constitute the most sustainable housing development locations in the context of the wider housing market area and travel to work area and whether the existing infrastructure, and environmental constraints can be resolved."*
- 2.7 The appropriate approach, as referred to in paragraph 2.32 is to consider 'all opportunities'.

- 2.8 Footnote 21 of the draft Local Plan refers to the 'At Crawley Study' undertaken by GL Hearn and published in 2009 (on behalf of Crawley Borough Council, Horsham District Council and Mid Sussex District Council). That document was based on earlier evidence from 2005 produced by Atkins ('Feasibility Study for Development Options at Crawley') on behalf of Mid Sussex District Council, West Sussex District Council, Horsham District Council and Crawley Borough Council.
- 2.9 It is clear from the 2005 and 2009 studies that the potential options at Crawley are broader than those referred to in the draft Local Plan.
- 2.10 Figure 1 below shows the 'Study Area' for Crawley, taken from the 2005 Feasibility Study.



**Figure 2.1: Crawley Study Area taken from the 'Feasibility Study for Development Options at Crawley' (Atkins on behalf of Mid Sussex District Council, West Sussex District Council, Horsham District Council and Crawley Borough Council, September 2005)**

- 2.11 In the 2009 Study, GL Hearn presented a plan of the Study Area, with various site options indicated, as shown below:



**Figure 2.2: Crawley Study Area taken from the ‘At Crawley Study Area (GL Hearn on behalf of Crawley Borough Council, Horsham District Council and Mid Sussex District Council, October 2009)**

**2.6 Is the proposed content in the Plan at paragraph 12.23 on the circumstances where development proposals adjacent to Crawley will be supported justified? Will it be effective in influencing spatial strategies or adjoining development proposals at either the plan preparation or decision-making stages in neighbouring authorities?**

2.12 Paragraph 12.23 of the draft Local Plan is generally welcomed as it sets out a series of circumstances where development on or close to the administrative boundaries will be supported by CBC. In the absence of a broader spatial / strategic Plan, this is a positive and proactive approach, but as we explain elsewhere.

2.13 However, it is not appropriate for this Plan to predetermine the content of the Local Plans for adjoining authorities (as it appears to at paragraph 2.32 for example).

2.14 Clearly the criteria at paragraph 12.23 of the draft Local Plan cannot be applied as development management ‘policy’ (and we note that they are not expressed as such). However, if they are retained in the Local Plan then they should be applied as a series of core principles by CBC in their responses to adjoining Local Plans, and in response to applications.

**2.7 Is paragraph 12.23 justified at point (ii) in seeking/requiring the completion of a Western Link prior to the (first) completion of dwellings? Is that supported by the available evidence base?**

2.15 We have no objection in principle to point ii as this starts with the phrase “If development is proposed to the western side of Crawley”.

**2.8 Does criterion xi) at paragraph 12.23 need to be amended to ensure consistency with national planning policy at NPPF paragraph 180c) which caveats the loss or deterioration of irreplaceable habitats with “unless there are wholly exceptional reasons, and a suitable compensation strategy exists”?**

2.16 We agree with this alteration.

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