

Crawley

Local Plan

Crawley Borough Local Plan Examination

Crawley Borough Council Response to Inspectors' Matters, Issues and Questions

Matter 3: Housing Needs

November 2023



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Issue 1: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to housing need and the housing requirement.

3.1 Question 3.1: Has the calculation of Local Housing Need (755 homes per annum) been undertaken appropriately using the standard method and correct inputs? Does it reflect up-to-date workplace-based affordability ratios?

3.1.1 The Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) paragraph 12.8, page 156, confirms that the calculation of Local Housing Need has been undertaken using the standard method, setting out the inputs used.

3.1.2 Paragraphs 3.1.1 and 3.1.2 on pages 8-9 of Topic Paper 3: Housing Needs, May 2023 (Submission Document Reference: DS/TP/03) set out how the figure of 755 dwellings per annum (and 12,080 for the Local Plan period) has been derived using inputs prescribed by the standard method, including the 2022 workplace-based affordability ratio (published in March 2023), and the average annual net change in households projected between 2023 and 2033 in the 2014-base household projections.

3.1.3 Step 3 of the standard method includes a cap on any increase in the housing need figure. Where relevant strategic policies were adopted (or were reviewed and found not to require updating) in the last five years the increase is capped at 40% above the average annual housing requirement set out in existing policies. Where this is not the case the increase is capped at 40% above the higher figure of either:

- the projected household growth over 10 years; or
- the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).

3.1.4 Crawley Borough Council (CBC) maintain that the relevant strategic policies were reviewed and found not to require updating within the last five years. This review was in the form of a Local Plan Five Year Policy Assessment which was approved by the CBC Full Council on 16 December 2020. The committee report, the meeting minutes, and the Local Plan Policy Assessment can be accessed on the CBC website (Post-Submission Document References: CBC/CBLP/08a and CBC/CBLP/08b). It is on this basis that the council has submitted returns to DLUHC in respect of the Housing Delivery Test, and the HDT dwelling requirement of 95 dwellings for 2020/21 (published in the HDT 2021 results; Post-Submission Document Reference: PS/H/HD/12) accordingly reflects the application of a 40% cap above the 2015 Local Plan average annual housing requirement for the entirety of that year, as follows:

2015 Local Plan Annual Average Requirement	340
Adjustment for affordability	720
Cap at 40% above adopted requirement	476
Adjustment for impact of covid within 2020/21 (4 months not counted)	317
Exported need	-222
Residual requirement	95

3.1.5 Notwithstanding this position, CBC would maintain that for plan-making purposes it is not appropriate for the 40% cap to be applied in relation to the adopted housing requirement (340dpa), as this requirement is 'supply based' and therefore not directly reflective of housing need. The need figure proposed is therefore uncapped (albeit still within the 40% cap over and above the projected household growth figure of 568dpa). This has been a consistent approach through the various iterations of the Local Plan Review and is reflected in the Northern West Sussex Strategic Housing Market Assessment, 2019, paragraphs 5.8-5.10 on pages 38-39 (Submission Document Reference: H/HN/01).

3.2 Question 3.2: Are there the circumstances in Crawley, having regard to PPG paragraphs 2a-002-20190220 and 2a-003-20190220, to indicate that an alternative level of housing need would be justified for the Borough thus resulting in a higher or lower housing requirement and associated consequences for any level of unmet housing need?

3.2.1 CBC does not consider that there are circumstances which would provide justification for an alternative level of housing need.

Gatwick Airport Northern Runway Proposals

3.2.2 In particular, CBC does not consider that there is any justification for a higher level of unmet need arising from the kinds of circumstances described in paragraph 2a-010-20201216 of the PPG. It is noted that the types of circumstances identified in that paragraph which could result in a higher need include 'strategic infrastructure improvements that are likely to drive an increase in the homes needed locally', and that the Gatwick Airport Development Consent Order (DCO) Northern Runway proposals is a 'strategic infrastructure improvement'. However, the submission by Gatwick Airport Limited (GAL) indicates that the employment opportunities generated by the airport would not generate any additional housing need beyond that identified in emerging Local Plans in the surrounding area (including Crawley). The Analysis provided in paragraphs 4.1.1 to 5.2.11 on pages 18-26 of GAL's Environmental Statement Appendix 17.9.3: 'Assessment of Population and Housing Effects' thus projects an overall labour surplus within the Northern West Sussex HMA in various housing-led scenarios (including existing/emerging housing trajectories as well as a 'need' based standard method based figure) notwithstanding the additional employment generated by the project (Post-Submission Document Reference: PS/H/HD/10).

3.2.3 While CBC does not endorse the analysis set out in the Appendix in full, it does not disagree with its conclusions regarding the implications of the project for the overall level of housing need during the period up to 2040. Accordingly the Northern West Sussex Housing Needs Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/02), page 9, sets out that the Housing Market Area Authorities do not consider the DCO proposals as justifying an increase in housing need.

Sustainability Appraisal

3.2.4 The identification of housing need at the level indicated (755 dwellings per annum), as distinct from a greater level, is also supported by Crawley Submission Sustainability appraisal, May 2023 (Submission Document Reference: KD/SA/01),

pages 259-265, where the options considered in respect of Policy H1: 'Housing Provision' include Options 1, 2, and 3, which all involve a housing need in excess of the uncapped Standard Method figure. For the purposes of these options the higher level of need is set at 1848, representing the level of need expected to be required to support delivery of affordable housing at a sufficient rate to satisfy affordable housing need: 739 dwellings per annum, as identified in the Northern West Sussex Strategic Housing Market Assessment, 2019, pages 4-5 (Submission Document Reference: H/HN/01). The Sustainability Appraisal finds that option 3 (housing need of 1848dpa; 'stepped' supply-constrained housing requirement of 314dpa; unmet need identified) performs essentially the same as option 6, the preferred option, in relation to the Sustainability Indicators, but was discounted in favour of option 6 owing to a lack of clear evidence or reasons to depart from the (uncapped) Standard Method figure.

- 3.3 Question 3.3: Given the scale of unmet need (7,050 homes) has plan preparation made every effort to optimise and increase housing delivery within the Borough as part of a spatial strategy that would deliver sustainable development?
- 3.3.1 CBC recognises that much of the borough is highly sustainable as compared with surrounding rural areas and smaller settlements, for example: see Crawley Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01), paragraphs 5.2 and 5.11-5.13 on pages 101-3, and Crawley Strategic Housing Land Availability Assessment 2023, February 2023, paragraph 3.11 on page 9 (Submission Document Reference: H/HD/04). Accordingly, Policies H1: Housing Provision; H3: Housing Typologies, and the associated typology policies H3a-H3f of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) set out an approach which is supportive in principle of housing development across much of the borough. Policy CL4: Compact Development – Layout, Scale and Appearance identifies the most sustainable locations (close to Crawley and Three Bridges railway stations; along the Town Centre Fastway bus network; neighbourhood parades and other areas with enhanced bus links and good access to local facilities) as areas where existing and improved transport connections can support higher densities than exist currently. This is set out and justified more fully in the Crawley Compact Residential Development Study, particularly paragraphs 5.10-5.17 on pages 103-104, Map 1 on page 114 and Map 2 on page 115.
- 3.3.2 On the other hand, the strategic constraints which apply to housing delivery as part of the proposed spatial strategy are necessary in order to ensure sustainable development in accordance with National and Local Policies. These constraints are set out in paragraph 3.4 of the Crawley Borough Submission Local Plan and further expanded upon in the Crawley Strategic Housing Land Availability Assessment, in paragraphs 3.4 to 3.9 on pages 8-9. They include:
- designated Local Green Space;
 - the High Weald AONB;
 - ancient Woodland;
 - flood Zone 3B (and Flood Zone 3A where the exception test has not been satisfied);

- sites where development would involve substantial harm to a designated heritage asset;
- minerals or Waste sites identified by West Sussex County Council;
- habitats of Principle Importance and locally designated biodiversity;
- land that is safeguarded from development which would be incompatible with expansion of Gatwick Airport;
- areas that are exposed to an unacceptable adverse effect from noise, including from potential future noise sources;
- long Distance Viewpoints identified in Policy CL7;
- main Employment Areas other than Crawley Town Centre;
- open space, sport and recreational spaces;
- structural landscaping.

3.4 Question 3.4: It is suggested in various representations that sources such as estate regeneration and further mixed use of employment areas could yield additional housing numbers, reducing the scale of unmet need. During the preparation of the plan, has every conceivable source of housing supply been robustly assessed and where necessary appropriately discounted?

3.4.1 Topic Paper 4: Housing Supply, July 2023 (Submission Document Reference: DS/TP/04) considers particular potential sources of additional housing supply. In summary, it finds as follows:

- **Employment Land, Upward Extensions & Town Centre:** Policy H2 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) seeks in general to protect employment uses within the 11 identified Main Employment areas within the borough, due to the need for employment land as well as incompatible land uses and unsuitable locations for residential due to lack of facilities (some of which are also subject to Article 4 Directions in respect of changes to residential use), which in practice would tend to substantially restrict the scope for housing development.

However, the approach is more permissive in the Town Centre, due to it being a highly sustainable location with access to many facilities and suitable for a mix of land uses. Crawley Borough Submission Local Plan footnote 15, page 23, confirms that a total of 2,087 dwellings are anticipated to come forward in the town centre over the period 2021-2040. Policies TC1: Primary Shopping Area and TC3: Town Centre Key Opportunity Sites support residential development by providing scope for residential use at first floor level within the Primary Shopping Area, and by allocating key sites for mixed-use development. Policies TC3 and H2 identify a minimum of 1,500 net dwellings to come forward cumulatively across the Town Centre Key Opportunity Sites. In addition, Policy H2: Key Housing Sites identifies the Town Centre generally as a 'Broad Location' for delivery of at least another 129 net additional dwellings (see also the council's response to Matter 4, Issue 2, Question 4.15). Policy TC2: Town Centre Neighbourhood Facilities seeks to ensure the delivery of a significant increase in residential population within Crawley Town Centre is supported by the necessary facilities associated with such development.

- **Estate Regeneration:** the feasibility of this type of development in Crawley is constrained by the fragmentation of property ownership through right to buy in a context where historic council housing predominantly takes the form of houses and two-storey flatted terraces rather than higher density flatted estates of the kind that are typically the focus of estate regeneration schemes. Such programmes take a long time to implement, and the delivery of any net growth in housing numbers would not occur until the latter part of any scheme which would be beyond the current Plan period. The council's staff and budget resources are limited and are currently mainly focussed on immediate housing pressures for Temporary Accommodation.

However, early consideration is being given corporately to possible opportunities for estate regeneration, including assessment of how it may be part of the solution to overcoming higher levels of deprivation in some neighbourhoods. Also, Crawley, being a New Town, has housing stock that is relatively young, but there are certain areas characterised by relatively poorly insulated systems housing, and this is proving particularly challenging to bring up to standard in line with the decarbonisation agenda. Estate regeneration is particularly being considered in these areas, where the costs of retrofitting properties to meet suitable levels of sustainability compare unfavourably with the cost and feasibility of complete redevelopment involving more intensive use of land. Consultancy support on estate regeneration has been commissioned by CBC and it is anticipated that over the Plan period some areas will be identified for regeneration, hence the proposed framework provided by Policy H3a: Estate Regeneration. However, even if land assembly and some housing delivery is achieved during the Plan period it is unlikely that any net-growth of housing will be realised as this occurs in the final phases of an estate regeneration scheme. (See also the council's response to Matter 2, Issue 1, Question 2.3.)

- **Open Spaces:** it is already the case that some areas of existing open space are allocated for uses including housing in Policy H2: Key Housing Sites (at Tinsley Lane, Breezehurst Drive Playing Fields, and Land East of Balcombe Road/Street Hill).

The Crawley Playing Pitch Strategy Stage D Strategy and Action Plan, March 2021 (Submission Document Reference WC/OSSR/04); the Crawley Open Space, Sport and Recreation Assessment, December 2020 (Submission Document Reference: WC/OSSR/01); and the Crawley Indoor Sports Facilities Assessment, January 2021 (Submission Document Reference WC/OSSR/02) are consistent in showing that scope for further the release of additional open space for housing is severely constrained by the importance of retaining open space for the use of the community. This is reflected in the approach of Policy OS1: Open Space, Sport and Recreation, in requiring that proposals which affect or remove existing open space must be justified in relation to local requirements for such facilities.

- 3.4.2 At a broader level, the proposed housing supply includes a windfall allowance of 100 dwellings per annum (dpa), as compared with 55dpa in the adopted Local Plan. The expectation that a significant proportion of housing supply will take the form of windfalls reflects the reality that a large portion of the borough is already built up

and is likely to generate a significant amount of residential development on small- and medium-sized portions of previously developed land, often as a result of discontinuation of existing uses, which can be difficult to predict in advance. As set out in the Windfall Statement, May 2023 (Submission Document Reference H/HD/06), the specific projection of 100dpa takes account, in particular, of an expected continuing loss of existing office stock (in areas unprotected by Article 4 Directions) to residential use, as well as increases to recent rates of windfall delivery as a result of the increased focus of the Local Plan on the effective use of land, and from further delivery of smaller/medium sites via the council's own-build programme.

- 3.4.3 Some further specific sites in the Forge Wood neighbourhood have been put forward in representations. These include five sites referred to in Representation 063 (2023), which are also shown on a map provided with Representation 063 (2020). Of these, four are assessed in the Crawley Strategic Housing Land Availability Assessment 2023, February 2023 (Submission Document Reference: H/HD/04) as sites, 94, 95, 96, and 97 (pages 217-224), and found to be unsuitable for housing development. A fifth site, described in Representation 063 (2023) as being 'south of Phase 2D' of the Forge Wood strategic development, in fact falls within the red line boundary of Phase 2D and of the Forge Wood masterplan area as a whole. In this context, it forms an area of soft landscaping required to be delivered and maintained under the approved plans for the sub-phase. As such, CBC does not consider this to be a site in its own right, but rather as part of Phase 2D, the development of which would require amendment, through the development management process, of the approved (and largely implemented) scheme for the sub-phase.
- 3.4.4 A further site at Forge Wood, promoted in Representation 103 (2021), is identified as unsuitable in the Crawley Strategic Housing Land Availability Assessment, February 2023, as site 73: 'North East Sector Gas Holder Site', on pages 201-203, on the basis that it falls entirely within Flood Zone 3a and partially within the functional floodplain, and has not passed either the sequential test or the exception test set out in Planning Practice Guidance on Flood risk and coastal change.
- 3.5 [Question 3.5: Does the policy framework of the Plan, for example Policies H3a-f \(housing typologies\) and TC3 \(town centre key opportunity sites\), provide a positively prepared and justified basis on which to make effective use of land within the Borough in order to support positive housing delivery?](#)
- 3.5.1 Crawley Borough Council (CBC) maintain that the policy framework provided by the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) represents a positively prepared and justified basis for making effective use of land in order to support positive housing delivery.
- 3.5.2 As set out in Topic Paper 4: Housing Supply, July 2023 (Submission Document Reference: DS/TP/04), paragraphs 3.3.1-3.3.8 on pages 13-15, an important part of the policy framework of the Local Plan for making effective use of land is comprised in Policies CL2 to CL5 and DD3 as well as Policies H3a-f.
- 3.5.3 Policies CL2-CL5 and DD3 set out how development will be expected to exploit potential for effective use of land through embracing opportunities for increased density, as appropriate; through design and/or masterplanning for successful links to

sustainable travel networks; and through implementation of standards intended to ensure an acceptable living environment within the context of medium and higher density new development. Policy CL1: Neighbourhood Principle can also be mentioned in this context, to the extent that the neighbourhood principle provides an organising spatial concept for the growth of residential communities, linked to Crawley's identity and development as a New Town, but also forward-looking in its emphasis on the benefits of locating residential development close to existing infrastructure and facilities which people need.

- 3.5.4 Alongside these, Policies H3a-f provide a clear and positive framework for consideration of the different types of site typologies which can be anticipated to arise within the built-up-area boundary. This 'typology' approach is consistent with the expectation, as set out in the Windfall Statement May 2023 (Submission Document Reference H/HD/06), that a significant proportion of the housing requirement will be met through a windfall allowance of 100 dwellings per annum. The 'typology' policies are expected to be particularly relevant to small- and medium-sized sites such as are expected to make up a significant proportion of the windfalls.
- 3.5.5 Policy TC3 also ties in with Policies CL1-CL5 and DD3 by setting a higher target for the delivery of housing on key town centre sites than featured in the 2015 version of the Policy (EC6: 'Development Sites within the Town Centre Boundary'). The higher target of 1,500 dwellings is informed by the application of higher density range expectations to individual sites, and by joint work on the Crawley College Masterplan by the council, Chichester College Group and One Public Estate. The use of an overarching target rather than individual site allocations is intended to support the inclusion of mixed-uses, consistently with the objective of maintaining the vitality and viability of the Town Centre.
- 3.6 [Question 3.6: Given the evidence in the Strategic Housing Land Availability Assessment, the Crawley Compact Residential Development Study and on plan-wide viability, would potentially even higher densities, particularly in and around the town centre, be an appropriate strategy?](#)
- 3.6.1 Crawley Borough Council (CBC) considers that the densities proposed in Policy CL4: 'Compact Development – Layout, Scale, and Appearance' of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) represent the most appropriate strategy in terms of achieving effective use of land to support housing delivery, consistently with national policy on design, and with other key local constraints, such as the proximity of Gatwick Airport. While these are minimum densities (except where existing character justifies a lower figure), and as such may be able to be exceeded in some cases on a site-specific basis, including through the character assessment/design coding process, CBC does not consider that higher minimum densities would be an appropriate strategy.
- 3.6.2 Topic Paper 4: Housing Supply, July 2023 (Submission Document Reference: DS/TP/04), page 14 (table), compares the densities set out in Policy CL4: Compact Development – Layout, Scale, and Appearance of the Submission Local Plan with the density ranges set out in Figure 10: 'Example Area Types' shown on page 14 of the National Model Design Code: Part 1 – the coding process (NMDC Part 1). It shows

that the Policy CL4 minimum density of 200+ dwellings per hectare (dph) for ‘high density’ areas, covering and extending beyond Crawley Town Centre, as shown on page 115, Map 2 of the Crawley Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01), already exceeds the indicative minimum density set out in the NMDC Part 1 as being representative of town/city centres, i.e. a ‘typical dense city typology with over 120 dwellings dph and a strong mix of uses’.

- 3.6.3 The only higher density identified in Figure 10 of the NMDC Part 1 is ‘high rise city’, relevant to ‘large city centres where there would be limited restrictions on height’. This approach is not considered appropriate in Crawley, given the proximity of Gatwick Airport, whose safe operation (including radar/air traffic control) could be negatively affected by high-rise buildings, and given that Crawley is not in any case a large city with the size and economic weight typically needed to support a high-rise development typology.
- 3.6.4 The density range identified in Policy CL4 for ‘moderate density’ areas (covering e.g. neighbourhood parades and extensive areas to the south of the town centre benefiting from high-capacity and high-frequency bus connections) has a minimum of 60 dwellings per hectare, corresponding to the NMDC Part 1 indicative minimum for the ‘urban neighbourhood’ typology, while the remainder of the built-up-area has a minimum density of 45 dwelling per hectare representing a slight uplift on the HMDC indicative minimum of 40 dwellings per hectare for the ‘suburbs’ typology.
- 3.6.5 The assessments detailed in the Crawley Strategic Housing Land Availability Assessment 2023, February 2023 (Submission Document Reference: H/HD/04), informed in turn by the site-specific assessments in the Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01), pages 115-121, provide further evidence that the density standards detailed in Policy CL4 can feasibly be achieved at the level of individual sites, where not constrained by existing character, including for example the presence of heritage designations and structural landscaping. The following table lists proposed allocations within the Built-Up Area Boundary which are not yet subject to an approved scheme (or a scheme approved subject to S106) and compares the gross site densities indicated by the Strategic Housing Land Availability Assessment with those that would be suggested by Policy CL4 (before allowing for character and other constraints), noting, where applicable, key site-specific constraints affecting the projected site yield. It will be seen that the projected site densities are compliant with the minimum densities set out in Policy CL4 except where there are character-related constraints or other site-specific factors which limit the developable area.

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SHLAA Ref	Site Name	Gross Area (ha.)	SHLAA Projected Yield	CL4 density standard (before allowing for character/site constraints) (dwellings / ha.)	SHLAA Projected Density (dwellings / ha.)	Character / other constraints notes
83	St Catherine's Hospice, Malthouse Road	0.73	60	Moderate Density 60-200	82	Site overlaps with Conservation Area
25	Tinsley Lane Playing Fields	6	120	Low Density 45+	20	Need for re-provision of playing pitch within site
16	Land Adjacent to Desmond Anderson, Tilgate	3.39	205	Moderate Density 60-200	60	Site partly in Flood Zones 3a & 3b
91	Land Adjacent to Sutherland House	0.35	30	High Density 200+	85	Net developable area limited by shape of site and presence of structural landscaping on boundary
27	Land to Southeast of Heathy Farm	4.15	188	Low Density 45+	45	Adjoining Ancient Woodland
24	The Imperial, Broadfield Barton	0.1	19	Moderate Density 60-200	190	
31	County Buildings	1.07	215*	High Density 200+	200*	

SHLAA Ref	Site Name	Gross Area (ha.)	SHLAA Projected Yield	CL4 density standard (before allowing for character/site constraints) (dwellings / ha.)	SHLAA Projected Density (dwellings / ha.)	Character / other constraints notes
30	Crawley College	3.05	363	High Density 200+	119	Need for retention of FE facilities within site
33	Land at Cross Keys	0.24	12	High Density 200+	50	Multiple designated heritage assets adjoining site
34	Telford Place, Haslett Avenue	1.68	380	High Density 200+	226	

*SHLAA projected yield from County Buildings site varies from the projection of 135 dwellings in the Housing Trajectory, Base Date 31 March 2023 (Submission Document Reference H/HD/01), which takes into account a potential mixed-use scenario including an allowance for employment floorspace.

- 3.6.6 The residential typologies detailed in the Crawley Local Plan Review Viability Assessment Appendix I, March 2021 (Submission Document Reference DS/VA/02b) on sheet 1 help to clarify at individual site level the nature of the typologies associated with the density ranges detailed in Policy CL4. They help to confirm, in common with Figure 10 of the NMDC Part 1, that the proposed minimum densities are broadly appropriate to the areas to which they are applied. 'High' densities at 200 dwelling per hectare and above thus represent flatted blocks of six or more storeys, with 'moderate' densities roughly ranging from mixed typologies combining flats and houses through to lower rise flatted blocks of 3-5 storeys. Meanwhile, densities at 35 and 40 dwellings per hectare are characteristic of developments predominantly taking the form of housing.
- 3.6.7 The Crawley Borough Local Plan & Community Infrastructure Levy Viability Assessment March 2021 (Submission Document Reference DS/VA/02a) and Appendices (Submission Document Reference DS/VA/02b) take into account the fact that high-density town centre development is subject to particular challenges in terms of higher existing use-values, and higher design and construction costs (e.g. the higher build costs per square metre and higher professional fees costs for the 6+ storey flatted typology recorded in Appendix I, sheet 2; and the higher existing use values applied in relation to Brownfield sites in Appendix IIIa). However, these are

considered to be appropriately mitigated by the reduced affordable housing requirement for Crawley Town Centre detailed in Policy H5: 'Affordable Housing' (with flexibility to apply this to higher density schemes elsewhere) and by flexibilities provided in relation to higher density town centre developments in Policy OS2: 'Provision of Open Space and Recreational Facilities'.

- 3.7 Question 3.7: Given the housing requirement for the plan is supply-led, has the assessment of land supply within the Borough, realistically and robustly profiled when deliverable and developable sites are likely to come forward and the capacity that is likely to be yielded? Is there a risk that the supply (the housing requirement) has been significantly under-calculated? Does evidence of recent over-delivery in the Borough against the Housing Delivery Test indicate a risk that the housing requirement could be too cautious (and so the level of unmet need reduced)?

Housing Land Supply Delivery

- 3.7.1 Crawley Borough Council (CBC) maintains that the assessment of housing land supply as regards to when deliverable and developable are likely to come forward, as set out in the Housing Trajectory, Base Date 31 March 2023 (Submission Document Reference H/HD/01) and Crawley Strategic Housing Land Availability Assessment 2023, February 2023 (Submission Document Reference: H/HD/04) is realistic and robust in overall terms.
- 3.7.2 Topic Paper 4: Housing Supply, July 2023 (Submission Document Reference: DS/TP/04) includes Appendix A, comprising a Housing Land Supply Statement, detailing the justification for identification of sites as 'deliverable'. However, the detail of the Statement is based on information available as of May 2023. Updates to this due to new information (including the implications of the judgement in *C G Fry & Son Ltd v Secretary of State for Levelling Up Housing and Communities & Anor*, in respect of water neutrality as a factor in discharge of conditions applications) would be expected to result in some changes to individual projected development trajectories. This may result in some overall reduction in the amount of development projected for years 1 to 5 of the Plan period, owing to delays associated with water neutrality and the widened scope of water neutrality restrictions arising from the *C G Fry & Son Ltd* judgment. On the other hand, the identity of the sites forming the identified housing supply and their relative sequencing would be likely to remain largely the same.
- 3.7.3 Where sites forming part of the identified housing supply do not satisfy the definition of 'deliverable' set out in Annex 2 of the National Planning Policy Framework (NPPF) these have been allocated to years 6 to 16 of the Local Plan period. The allocation of sites to particular years within this period is based on a realistic assessment of when they are likely to be delivered, although where smaller and medium sized sites in particular are concerned there is potential for plans to change within a relatively short timeframe, and in particular it is possible that 'developable' sites of this type could come forward in Years 1 to 5. This could happen, for example, where such sites are able to obtain permission with the help of support from the strategic water offsetting scheme, through satisfying priority criteria set by the scheme.

- 3.7.4 Development trajectories are inevitably somewhat less clear in respect of Broad Locations and as such there is greater indeterminacy regarding the likely timing of the 129 additional net dwellings in Crawley Town Centre and 84 East of London Road, although these do not collectively form a large proportion of the anticipated supply.

Under-Calculation of Housing Supply

- 3.7.5 CBC highlights recent monitoring evidence, set out in the Crawley Borough Council Authority Monitoring Report 1 April 2021 – 31 March 2022 (2021/22 AMR) (Submission Document Reference: CB/AMR/01), as an appropriate guide to considering the accuracy of the past calculation of housing supply against delivery within the borough. Table 3.2 on page 14 of the 2021/22 AMR confirms that net housing delivery in the borough over the period 2015-2022 amounted to 95 per cent of the housing supply which was projected over the same period in the Housing Trajectory accompanying the adopted 2015 Local Plan. In other words, delivery over this period as a whole closely matched the projection.
- 3.7.6 Conversely, CBC considers that the Housing Delivery Test results in recent years provide a somewhat distorted view as to how housing delivery has fared in relation to the adopted Local Plan housing requirement, reflecting peculiarities of the calculation methodology (including reductions in the requirement on account of the Covid-19 pandemic) (Post-Submission Document References: PS/H/HD/11; PS/H/HD/12; and PS/H/HD/13).
- 3.7.7 It should be noted that Policy H1 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) establishes the housing requirement as a minimum delivery figure. The council is committed to maximising housing supply within the borough's administrative boundaries where these are consistent with the other policies and proposals in this Local Plan and the principle of sustainable development.
- 3.7.8 Critically, in respect of the projected development yield, CBC considers that the approach to the assessment of housing supply described in response to questions 3.4 and 3.6 above provide appropriate insurance against under-calculation of the housing supply as far as this is possible on the basis of current evidence and predicted trends. This has included the robust identification of potential sources of housing supply, increasing the windfall allowance to 100 dwellings per annum (dpa) from the current 55dpa, and the assessment of site capacities with reference to the density standards in Policy CL4.
- 3.7.9 In addition, it is possible that future policy or legal changes, including but not limited to the review 'triggers' identified in Crawley Borough Submission Local Plan, could lead to major change in the extent of the identified housing supply, but these can be addressed as required through future reviews of the Local Plan.