

## Home Builders Federation

### Matter 3

## CRAWLEY LOCAL PLAN 2024-2040 EXAMINATION

### Matter 3 – Housing Needs

***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 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?*

Yes. The HBF would agree that the LHNA is 755 dpa and uses the most recent workplace-based affordability ratio published by ONS in March 2023.

*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?*

No. The NPPF and PPG states that there must be exceptional circumstances to justify an alternative approach to assessing housing need to that set out in Planning Practice Guidance. The Council has not presented any such circumstances that would warrant an alternative figure and the HBF does not consider there to be any in Crawley.

*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?*

It will be essential for the council to identify all available options for development and leave no stone unturned in order to meet its needs. This is even more essential given that it looks unlikely that neighbouring authorities are not willing to help the Council address its unmet needs.

*3.4 It 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?

This is for the Council to answer. However, whilst the HBF considers it essential that the Council robustly assess its land supply it should not seek to include sources of supply that are not considered deliverable or developable in order to try and reduce the scale of the unmet needs. The Council has already included a windfall allowance within its land supply, and this is sufficient in terms of speculative sites that may come forward during the plan period.

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?

No comment

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?

It will be important to allocate all appropriate sites to help meet the housing needs of Crawley and ensure delivery is maximised on those sites. However, these sites will need to be developable and deliverable with levels of delivery on those sites realistic. The Council should not seek to inflate its supply unrealistically in a numerical attempt to reduce its unmet needs.

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)?

The HBF cannot comment the delivery profiles and capacities of the sites in Crawley housing land supply. However, with regard to the last question any over delivery does not indicate that there is a risk that the Council are overestimating the level of unmet needs across the plan period. Over delivery against current requirements indicates that the market in the area is strong and that there is demand for homes in Crawley. Potentially this may mean that the available supply will come forward more quickly than planned for, but it does not necessarily mean that more homes will be delivered in total.

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