

**Crawley Local Plan 2024 - 2040 Examination -
Matter 3: Housing Needs**
Statement on behalf of A2Dominion

October 2023

Turley

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Our reference
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1. Introduction

- 1.1 This Statement has been prepared by Turley on behalf of A2Dominion in relation to Matter 3 (Housing Needs) 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 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.

3.2 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?

- 2.1 Topic Paper 3 Housing Needs (ref: DS/TP/03) confirms that the Crawley's total annual housing need figure for 2023, based on the Standard Method, is 755 dwellings per year. We concur with that figure.
- 2.2 Over a 16-year period (2024 – 2040), that equates to a total housing need arising from Crawley of 12,080 dwellings.
- 2.3 We do not agree that there is any case to reduce the housing requirement for the socio-economic reasons summarised below.
- 2.4 Paragraph 3.3.2 of Topic Paper 3 recognises that “Crawley has a very important role in the sub-regional economy, and has been identified as being well located to support the delivery of economic growth.”
- 2.5 Paragraph 3.3.3 of the same document highlights the level of affordable housing need in the Borough, stating that:

“The Updated SHMA found that the affordable housing need in Crawley equated to a total of 739 affordable homes per year, of which 563 (76%) dwellings were needed as rented affordable homes, and 176 (24%) dwellings were needed to be provided for affordable home ownership.”
- 2.6 Clearly, even the Standard Method would fail to address the level of affordable housing need in the Borough, even if there was capacity to accommodate 755 dwellings per annum.
- 2.7 Table 6 of Topic Paper 3 reinforces the strategic need to address unmet housing needs. Whilst the general position, against the standard method is that unmet needs equates to 7,050 dwellings, it also highlights **an unmet need of 9,812 dwellings, just for affordable housing.**
- 2.8 There is no commentary in Topic Paper 3 as to whether or not an alternative housing figure should be pursued. We have some sympathy with the notion that if needs cannot be met, then there is little need to consider an increased requirement.

- 2.9 In our submission, there is a strategic justification for doing so. It is clear from the evidence base to this Examination that Crawley is both an economic hub, of importance to the economy, but an area which is unable to accommodate its own needs. The side-effect of that approach is that it is those in greatest need who suffer the most, highlighted by the Council's recognition (in Topic Paper 3), that the level of growth planned for allows just 17% of affordable housing needs to be met. To get to that position, Topic Paper 3 is based on the assumption that 40% affordable housing is secured from all new housing developments within the Borough.
- 2.10 That is clearly an unrealistic assumption for at least two reasons. Firstly, it is highly likely that there will be instances where a reduced level of affordable housing is proposed due to viability. Secondly, Policy H5 of the draft Local Plan itself assumes that there will be instances where a lower percentage of affordable housing will be required, for example 25% within the town centre.
- 2.11 Table 7 of Topic Paper 3 demonstrates the effect of the reduced affordable housing requirement in the town centre, meaning that 108 affordable dwellings are anticipated per annum, compared to a requirement for 739 dpa as identified in the SHMA.
- 2.12 For these reasons, we urge the Inspector to conclude that the housing requirement is greater than the 'minimum' figure derived from the standard method. The fact that CBC cannot accommodate the level of growth required by the standard method, or a greater requirement is irrelevant to the question of what the requirement should be.
- 2.13 Setting a higher housing requirement not only serves to support and recognise the economic role of Crawley, but in our submission is essential in order to maximise the chances of the wider planning policy context making a meaning contribution to addressing the very significant (unmet) need for affordable housing.

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?

- 2.14 The extent of the unmet housing needs arising from Crawley Borough during the course of the Plan-period is clearly a key issue for this Examination.
- 2.15 The Inspector's questions include points relating to site capacity, and whether or not the housing supply (the housing requirement (has been significantly undercounted).
- 2.16 We do not offer any responses on those matters.
- 2.17 However, this line of questioning (relating to site capacity and housing supply for example, as well as the interrelated question of the housing requirement in 3.2) is of strategic importance and we urge the Inspector to reach a very clear conclusion of all of these matters. This is essential to ensure that the other authorities are aware of this position and so it can inform their draft Local Plans.

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