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CRAWLEY LOCAL PLAN EXAMINATION

STATEMENT ON BEHALF OF OXFORD MATCH LIMITED IN CONNECTION WITH MATTER 3 ISSUE 1 – HOUSING NEED AND HOUSING REQUIREMENT (NOVEMBER 2023)

1. These representations on behalf of Oxford Match Limited have been submitted in response to the Inspector's request for further written statements on questions identified in the Schedule of Matters, Issues & Questions for the Hearing Sessions November 2023. This statement relates to *Matter 3, Issue 1 – Housing Need and Housing Requirement*. We have where appropriate referred to the question number raised by the Inspector.
2. This Statement should also be read within the context of those submitted by other representors.
3. Our client owns the property comprising nos. 1 – 5 Queensway and 48 – 52 The Boulevard. The property is located within Crawley Town Centre and is within a Conservation Area.
4. Representations were submitted on behalf of Oxford Match Limited in response to the Crawley Local Plan 2021 - 2037 Submission Draft in June 2021 and to the Draft Crawley Local Plan 2024-2040 (May 2023) Submission Public Consultation in June 2023.
5. In the first of these two representations we welcomed the draft town centre policies which were generally supportive of the principle of, inter alia, development comprising the conversion of the upper floors of existing properties for residential use together with appropriate upward extensions of buildings to provide additional dwellings. We stressed the importance of windfall sites coming forward to assist the Council meeting their housing needs and housing requirements. We cautioned against policies being too prescriptive in terms of meeting affordable housing criteria and elements of design that may well work against the provision of town centre residential development on windfall sites.
6. In the representations submitted in June 2023 to the version of the Local Plan that is the subject of these Examination Hearings, we stated that taken together draft policies EC1, EC2, TC1 to TC5, H2, and H3c are generally supportive of the principle of the proposed development comprising the conversion / redevelopment / upward extension of the upper floors of properties within the defined town centre for residential use with the ground floor being retained for Class E uses (Commercial, Business and Service).



7. We emphasised that the provision of additional dwellings on windfall sites is critical to the Council where they are heavily reliant on neighbouring local planning authorities in meeting the identified housing need (58%) over the period of the Local Plan.
8. The draft Local Plan expects 1,598 new dwellings to come from windfall sites (100 dwellings per annum). Whilst this “allowance” represents an increase from 55 dwellings per annum from the adopted Local Plan (2015) we have a number of reservations.
9. Firstly, requiring three-bedroom properties in town centre locations in car-free developments are unlikely to be attractive to families and may well result in marketing difficulties. With this knowledge, housebuilders and developers may well be reluctant to provide for three-bedroom dwellings in such locations. We do however note that draft Policy H4 which requires all housing development to provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand, dependent upon the characteristics of the site (our underlining for emphasis). The draft policy also contains a “Housing Mix Test” which in our view is prescriptive and potentially conflicts with the “characteristics of the site” in town centre locations where paragraph 3.16 of the Draft Plan states that “*family accommodation, in accordance with Policy H3cmay not necessarily be suitable for all sites.*”
10. Secondly, the table under paragraph 13.14 indicates the provision of 30% of the market housing element on town centre sites should be Family Homes (25% 3-bedrooms and 5% 4-plus-bedrooms). In addition, the table indicates that the affordable rental element to be provided should be 25 - 30% for 3-bedrooms and 5 - 10% for 4-plus bedrooms. This seems to be excessive especially for a flatted town centre development and may have the adverse effect of reducing the viability of town centre schemes and consequently may well materially alter the affordable housing provision.
11. Thirdly, Policy DD3 as drafted will not make the most efficient use of deliverable land, particularly constrained town centre sites that could easily contribute to the housing requirements as windfall.
12. A very comprehensive Pre-App (Ref: CR/2023/8247/PRA) was submitted on 24 October 2023 proposing the redevelopment of nos. 1 – 5 Queensway and 48 – 52 The Boulevard to provide for 39 dwellings in 3 separate blocks above a ground floor that would remain in Class E use. The Council’s initial response is awaited.
13. Crawley, like other LPAs in the Home Counties faces a challenging situation in bringing forward development and windfall sites to meet housing demand, particularly where the general needs for housing are pressing.
14. The actual number of dwellings that are delivered will be determined by financial viability.
15. There is a need for the Plan to make effective use of land within the Borough in order to support positive housing delivery (Q.3.5) and therefore the reservations expressed above must be considered.

16. Furthermore, higher densities, particularly in and around the town centre, should be an appropriate strategy (Q.3.6) in a situation where Crawley are heavily reliant on neighbouring local planning authorities to assist in meeting the identified housing need (58%) over the period of the Local Plan. We note from the responses from other Local Planning Authorities in the Duty to Cooperate Statement (September 2023) that they are not in a position to assist Crawley meeting its housing needs and housing requirements.