



Crawley

Local Plan

Ref No:

Office use only

Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

Representations can be made via this form and emailed to strategic.planning@crawley.gov.uk or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client's name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at www.crawley.gov.uk/privacy. Specific reference to the Local Plan and planning policy related public consultation can be found [here](#).

PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple "PART B" sections with a single "PART A" completed.

PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

	1. Personal details	2. Agent's details
Title:	Dr	N/A
First name:	Roger	
Surname:	Smith	
Organisation:	CPRE Sussex	
Address line 1:	Brownings Farm	

Address line 2:	Blackboys	
Town/city:	Uckfield	
Postcode:	TN22 5HG	
Telephone:	01825 890 975	
Email:	rogerfinch.smith@gmail.com	

PART B – Your representation

3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

4. Which part of the Local Plan does this representation relate to?

Paragraph:		Policy:	H1 Housing Provision	Other:	
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5. Do you consider the Local Plan to be: (Please tick)

- | | | |
|---|---|--|
| 5.1. Legally compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| 5.2. Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

Strategic Policy H1: Housing Provision

SUMMARY

CPRE Sussex considers that Strategic Policy H1: Housing Provision is unsound.

- i. By means of the Standard Method formula the Draft Local Plan identifies a minimum housing need for the plan period of 12,080 dwellings, of which because of severe land-supply constraints only 5,030 (41,64%) can be accommodated within the borough.

- ii. The draft plan assumes that under the duty to cooperate the resultant unmet need of 7,050 dwellings can and will be accommodated by other local authorities, primarily Horsham and Mid Sussex.
- iii. Whether the intended recipients have the capacity within their environmental and infrastructure constraints to accommodate all the 7,050 dwellings, as well as their own substantial Standard Method housing needs, is assumed, not considered by the draft plan.
- iv. Usage of the Standard Method formula is not mandatory. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for their communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development to achieve Water Neutrality in Horsham District and much of Crawley Borough, need to be considered.
- v. Crawley's unmet housing need should be adjusted accordingly.

EXPLANATION

1. The Draft Local Plan identifies a minimum housing need for the plan period 2024-2040, determined by means of the Standard Method formula, of 12,080 dwellings (paragraph 12.8).
 - 1.2 Because of Crawley's exceptional land supply constraints, the plan '*makes provision for the development of a minimum of 5,030 net dwellings in the borough*', therefore provision for only 41.64% of its Standard Method calculated need.
 - 1.3 Crawley's remaining 7,050 (58.36%) dwellings '*will need to be considered through Duty to Cooperate discussions as part of the Local Plan Reviews for the other authorities within the Housing Market Area (primarily Horsham and Mid Sussex along with a small part of Reigate and Banstead, particularly an overlap with Horley)*' (paragraph 12.39).
2. The draft plan (paragraph 12.39) indicates that whether the resultant 7,050 (58.36%) unmet housing need can be accommodated by the intended recipients, primarily Horsham and Mid Sussex, within their environmental and infrastructure constraints, has yet to be determined and agreed by those authorities.
3. Furthermore, having to accommodate the greater part of Crawley's huge Standard Method derived unmet need as well as their own substantial Standard-Method determined targets (acknowledged by Crawley's draft plan, paragraph 12.39) would most certainly render both Horsham and Mid Sussex District Councils

vulnerable to Housing Delivery Test failure, and put at substantial risk their ability to meet 5-year housing land supply requirements.

3.1 In which event developers would seek permissions at Appeal if refused, to develop sites not allocated in their local authorities' local plans.

4. This is of considerable consequence because although councils allocate sites in local plans with the capacity to accommodate housebuilding targets, they have no direct control over housing delivery rates, but are nevertheless penalized when developers underdeliver against local plan targets.

5. Developers/housebuilders decide build-rates and they will not build more houses than can be sold at an acceptable-to-them profit. In the event of reducing sales, as in an economic downturn, they will adjust completion rates downwards, resulting in undersupply against targets, as happened in the aftermath of the credit crunch of 2007/08.

5.1 A further 'credit crunch' is now emerging, adding to uncertainty about the UK's economy and future growth.

6. Note that Chichester District Council is also seeking to export its unmet need to neighbouring LPAs, including Horsham District. Doubtless Adur and Worthing, and Brighton and Hove will do same, and Mid Sussex may well be in the frame for some of Brighton and Hove's unmet needs too.

7. Build-rates might also be constrained by the requirement to achieve Water Neutrality.

7.1 The 'Sussex North Water Neutrality Study: Part C – Mitigation Strategy Final Report', November 2022, advises that

“Water neutrality is required as long as there is potential for an adverse effect on the sensitive habitats in the Arun Valley. In practice this means it is required until Southern Water can provide an alternative water source to replace groundwater abstraction at Pulborough” (page x). And that

“Should insufficient offsetting be available in a given year (as a sum of the contribution from the Scheme and from SW's water demand reduction activities) it may be necessary to restrict growth in the following year by way of Grampian Conditions in order to maintain neutrality” (paragraph 53).

7.2 The 'Crawley Borough Council Local Plan Review Sustainability Appraisal/Strategic Environmental Assessment Draft Report. For the Submission Local Plan May 2023', states that *“Offsetting must be in place before water demand is generated, for instance before new houses are occupied. If it is not possible to*

provide sufficient offsetting up front, either because it cannot be delivered fast enough, or there is not enough available offsetting to meet demand, this will restrict the amount of growth that can go ahead". And that "The more off-setting is needed, the more difficult it becomes to achieve water neutrality, due to the finite options available within the water resource zone" (paragraph A27).

Usage of the Standard Method formula is not mandatory

8. The Government's 'Guidance Housing and economic needs assessment guides councils in how to assess their housing needs' advises that the use of the Standard Method is not mandatory, *'if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination'* with the caveat that *'There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances'*.

(Paragraph: 003 Reference ID: 2a-003-20190220. Revision date: 20 02 2019)

8.1 Crawley's land supply constraints are exceptional, as is acknowledged by the draft plan (paragraph 2'3, see also 1.32, 3.3, 12.11, 12.34), and in consequence of those constraints 7,050 (58.36%) of the 12,080 Standard Method determined target will have to be accommodated by other LPAs, primarily Horsham and Mid Sussex, in addition to their Standard-Method determined housing need.

CONCLUSION

9. Usage of the Standard Method formula is not mandatory. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for their communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development in Horsham District and much of Crawley Borough to achieve Water Neutrality need to be considered.

9.1 Crawley's unmet housing need can then be adjusted accordingly.

Dr R F Smith DPhil, BA (Hons), PGCE, FRGS

Trustee CPRE Sussex

7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.

Usage of the Standard Method formula is not mandatory. Therefore, to enable the Duty to Cooperate to be fulfilled sustainably, and to ensure a sustainable future for their communities, whether and how many of the 7,050 new dwellings can/could be accommodated by the intended recipients should be determined in consultation with them. Environmental and infrastructure constraints, including the requirement for development in Horsham District and much of Crawley Borough to achieve Water Neutrality need to be considered.

Crawley's unmet housing need can then be adjusted accordingly.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:

I have taken part in the Examination in Public of local plans. Participating enables one to present and explain concerns in person to the Inspector, to answer any questions arising and to ask questions and comment on the views of others through the Inspector.

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at:

www.crawley.gov.uk/localplanreview

Signature

I submitted this completed form by email

Date

15 June 2023