Crawley &

Draft Crawley Borough Local Plan 2024 – 2040 May 2023

For

Submission Publication Consultation: May – June 2023



- Of these, 56% are anticipated to be in the market sector, with the remaining 44% needed in affordable tenures.
- 12.29 Supporting working-age adults who have care and support needs to be as independent as possible is equally important. Extra Care Housing can again contribute to meeting the housing and care requirements of some of these adults. West Sussex County Council sees Extra Care Housing as an all age housing solution and is keen to see barriers (such as aged over 55) removed from the criteria for this type of housing going forward. On this basis, specific allocations for housing for older people will also apply for the provision of Extra Care Housing for all ages.
- 12.30 West Sussex County Council has a target of 500 new Extra Care Housing homes across West Sussex by 2025. This target requires a development programme of at least 100 new homes each year, working in partnership with Districts and Boroughs, and with housing providers such as Registered Providers with experience of development of Extra Care Housing. Although there are existing Extra Care Housing schemes in Crawley, there is still, by the available measures, an undersupply of Extra Care Housing. Therefore, there is a need for further development in Crawley in order to meet the estimated demand for two schemes of 60 homes each over the Plan period.
- 12.31 Extra Care Housing schemes can additionally offer services to the local community and develop as a community resource, as well as offering employment and training opportunities in the local communities they serve. Mixed tenure schemes of Extra Care Housing located in areas where the care and support provider could recruit, and which are well located in terms of local available facilities, will be supported.
- 12.32 As Care Home stock forms a very specific part of the housing needs market, it is considered this falls within the definition set out in the CBLP for 'Infrastructure' which confirms that: "infrastructure includes a wide range of services and facilities such as"... "health, social infrastructure, community facilities"... Policy IN1: Infrastructure Provision, therefore, applies in relation to the protection of existing Care Home facilities. Under this Policy the loss of such provision through the redevelopment of sites for alternative uses would be prevented unless an equivalent replacement or improvement is provided, or there is sufficient alternative offer in the area.

Local Plan Policies

Housing Provision

- 12.33 The Local Plan provides a supply of housing sites to support delivery towards meeting the needs of present and future generations, whilst reflecting the physical constraints of the borough and the other policy objectives within this Plan.
- 12.34 These constraints include Local Green Space, designated heritage assets (Listed Buildings, Conservation Areas and Scheduled Monuments), Local Wildlife Sites, ancient woodland, structural landscaping, possible airport expansion/aircraft noise, and open space and floodplains. These constraints, together with the tight relationship between the Built-Up Area Boundary and the borough's administrative boundary, significantly limit capacity. The exception to this are the potential opportunities which may be found for higher density schemes within a greater mixed use Town Centre.
- 12.35 It is, therefore, recognised that continued cross-boundary working to understand the nature of the wider housing market area is essential to ensure that housing needs are being met in an appropriate and functional manner. There is already a long-established means of working through numerous joint evidence base documents, a joint Development Plan Document for the West of Bewbush neighbourhood (with

Horsham District Council), and the Gatwick Diamond Local Strategic Statement and Memorandum of Understanding.

Strategic Policy H1: Housing Provision

The council will positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible, whilst ensuring against detrimental town-cramming or unacceptable impacts on the planned character of the existing neighbourhoods or on residential amenity.

Proposals that result in a net loss of dwellings will be resisted.

All reasonable opportunities will be considered including: brownfield sites; surplus green space; town centre living; and opportunities on the edge of Crawley, where these are consistent with the other policies and proposals in this Local Plan and the principle of sustainable development.

The Local Plan makes provision for the development of a minimum of 5,030 net dwellings in the borough in the period 2024 to 2040¹⁰⁷.

This minimum requirement will be broken down into an annual average requirement on a stepped basis as follows:

- Years 1-5 (2024-29): 400 dwellings per annum (dpa)
- Years 6-10 (2029-34): 360dpa
- Years 11-16 (2034-40): 205dpa.

After this supply is deducted from the identified housing need of 12,080 over the period 2024 to 2040, there will be a remaining unmet housing need, of approximately 7,050 dwellings, arising from Crawley over the Plan period. This will arise as follows:

- Years 1-5 (2024-29): 355dpa
- Years 6-10 (2029-34): 395dpa
- Years 11-16 (2034-40): 550dpa

The council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley.

Reasoned Justification

12.36 The housing figure identified in Policy H1 represents a 'supply-led' requirement, and reflects the compact nature of the borough, its limited land availability and significant environmental, potential airport expansion and noise constraints.

12.37 The majority of housing delivery (against the borough's housing requirement) will take place in the Years 1–10 of the Plan period, beyond which capacity, and therefore identified delivery, is expected to be significantly lower (as illustrated in the Housing Trajectory). This is partly due to the development of Crawley's new neighbourhood of up to 1,900 dwellings, Forge Wood, which forms a major part of housing delivery in the first ten years of the Plan period and is the last remaining large area of relatively unconstrained land in the borough (540 dwellings of which remained outstanding as of March 2023). The varied nature of housing land supply (and associated housing delivery) over the Plan period makes it difficult to identify an annual housing delivery target within Policy H1. However, whilst an annualised

¹⁰⁷ This includes the additional 10% buffer within Years 1-5 as required by paragraph 74 of the National Planning Policy Framework (2021) as detailed in the council's Housing Trajectory, 31 March 2023

- average delivery of around 314 dwellings per annum is anticipated, a stepped trajectory is reflected in the Policy to account for the higher delivery in the early and middle part of the Plan period and the lower anticipated levels towards the end. On this basis, monitoring of the housing delivery within the borough will reflect the planned approach taken, rather than suggesting "over delivery" followed by "under delivery".
- 12.38 The council has endeavoured to ensure that every opportunity for residential development within the borough has been fully considered through the Local Plan process. Additional sites were proposed through the council's "Call for Sites" and the council's Strategic Housing Land Availability Assessment has been updated following the early engagement consultation and subsequent rounds of Regulation 19 consultation. All sites have been reassessed to consider those which are considered to be suitable for development and either 'deliverable' in Years 1–5 or 'developable' in Years 6–10 or 11–16, and density levels of allocated sites have been reassessed in light of Policy CL4 and the council's commitment to making effective use of land. The SHLAA also identifies a number of sites which are considered suitable for residential development but unlikely to come forward due to factors such as ownership and viability, and these sites cannot reasonably be expected to count towards housing land supply. However, the council will continue to work proactively with landowners to address the key barriers to bringing these sites forward. The supply figure should therefore be considered as a minimum.
- 12.39 The constrained nature of Crawley's land supply means that approximately 42% of the borough's predicted housing need over the 16 years 2024 2040 can be met within the borough boundaries. The remaining unmet housing need from Crawley, of 7,050¹⁰⁸, 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). The adopted Local Plans for Horsham and Mid Sussex districts had anticipated to provide an additional 3,000 dwellings¹⁰⁹, above their objectively assessed housing needs, in order to meet Crawley's unmet need. However, through the Local Plan Reviews this figure is likely to change, particularly as the Standard Method increases their own housing requirements to above their current adopted Plan commitments (see paragraph 2.29).
- 12.40 Opportunities for urban extensions immediately adjoining Crawley's borough boundaries will continue to be explored with Crawley's neighbouring authorities, taking into account the issues set out in paragraphs 12.17-12.23 above. Also, if safeguarding is lifted and a decision made to locate additional runway capacity elsewhere in the country, opportunities to the north of Langley Green and Forge Wood will be fully assessed for additional housing provision. Efforts will be made to include affordable housing provision to meet Crawley's needs outside of the borough, wherever possible, particularly if these are close to the borough boundary.

Housing Monitoring and Delivery

12.41 Housing delivery will be continually monitored and reported at least annually through the Authority's Monitoring Report. Delivery will be assessed against the expectations of the Local Plan Housing Trajectory, and against the annually updated Housing Trajectory. The council will also be monitored through the government's national Housing Delivery Test. This will be based on the annualised average housing target set by the Local Plan (where the Plan remains up-to-date) over a preceding rolling

 $^{^{108}}$ 12,080 dwellings housing need (Standard Method 755 x 16 years) – 5,030 dwellings total supply 2024 – 2040 (CBC Housing Trajectory, March 2023) = 7,050 dwellings unmet need.

^{109 1,500} dwellings to be provided in Mid Sussex district (between April 2024 and March 2031: Policies DP4 and DP5, Mid Sussex District Plan 2014 – 2031, 2018) and 1,500 dwellings to be provided in Horsham district (between April 2021 and March 2031, Horsham District Planning Framework, 2015)

- three-year period. As the anticipated higher delivery in the first part of the Plan period would not be considered as part of the Housing Delivery Test towards the end of the Plan period, a stepped target is established in Policy H1, to ensure the borough is measured against the realistic position of a constrained and reducing land supply.
- 12.42 Whilst the scope for the council to deliver private development, once planning permission is granted, is limited, the council has a history of intervening and supporting delivery of stalled development. In addition, the council has a robust ownbuild programme. Should delivery rates fall below 95% of the housing requirement, through the Housing Delivery Test, the council will be required to prepare an Action Plan. This will assess the causes of under-delivery and identify actions to increase delivery in future years. However, even where delivery is exceeding or meeting the Housing Delivery Test, as part of the council's monitoring the implementation of policies, the progress of key development sites identified by the Plan will be assessed and, where these are not coming forward in line with the anticipated Housing Trajectory timescales or delivery rates, the council will seek to identify the causes and whether there is scope for support or intervention.
- 12.43 However, early delivery will not override the need for a scheme to be policy compliant and meet the expectations of the Local Plan as a whole for good design and high quality schemes. Furthermore, the limited land supply of the borough makes on-site affordable housing delivery imperative, and viability claims suggesting this is slowing delivery will not automatically result in a reduction of the council's expectations for this to be provided.

Key Housing Sites

12.44 New housing is considered integral to the creation of sustainable neighbourhoods in Crawley. The council will ensure that new housing opportunities are identified according to both land availability and the characteristics of individual neighbourhoods. This approach will respect the town's unique neighbourhood development and design principles and preserve the most valued of the town's environmental features such as open space and strategic landscaping.

Policy H2: Key Housing Sites

The following sites are identified as key housing sites and allocated on the Local Plan Map. These are considered to be critical to the delivery of future housing in Crawley and are identified as being 'deliverable' within the first five years of the Plan (2024/25 – 2028/29) or 'developable' in years 6–16 (2029/30 – 2039/40)¹¹⁰. To ensure the delivery of the overall minimum housing figure set out in Policy H1, as supported by the Housing Trajectory, indicative capacity figures for each site are shown in brackets below.

Deliverable

- Forge Wood Phase 4B, Pound Hill (434 dwellings)
- Zurich House, East Park, Southgate (53 dwellings)
- Former TSB site, Russell Way, Three Bridges (59 dwellings)
- Upper Floors, 7 13 The Broadway & 1 3 Queens Square, Northgate (25 dwellings)
- Shaw House, Pegler Way, West Green (33 dwellings)
- Longley House, Southgate (121 dwellings)
- Land at Steers Lane, Forge Wood (185 dwellings) (subject to implementation of outline planning permission of CR/2018/0894/OUT, or any amendment thereof, and associated Reserved Matters approval(s))

¹¹⁰ Crawley Borough Council Housing Trajectory, 31 March 2023