

CRAWLEY BOROUGH LOCAL PLAN EXAMINATION

Crawley Borough Council Response to Inspector's
Matters, Issues and Questions

Matter 3: Housing
Issue 3: Housing Delivery

February 2015



Issue 3: Whether the CBLP is effective in securing, as far as is possible, timely delivery of the housing required to meet the identified needs?

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- 3.8 Is the housing trajectory realistic and achievable? Does it demonstrate a reliable 5 year housing supply (including NPPF buffer) and developable sites for years 6-10? Should there be a contingency in place if, over time, housing falls behind the trajectory?
- 3.9 Should policy H1 refer to potential delivery of the unmet needs outside the borough? Should exploration of the opportunities for urban extensions adjoining Crawley be included in policy H1?

Appendices

Appendix A: Affordable Housing Trajectory

Appendix B: Policy H1 Extract Internal Officer Draft (CMT Version) 10 October 2013

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3.8 Is the housing trajectory realistic and achievable? Does it demonstrate a reliable 5 year housing supply (including NPPF buffer) and developable sites for years 6-10? Should there be a contingency in place if, over time, housing falls behind the trajectory?

- 3.8.1 The council is confident that the housing trajectory¹ provides a sound reflection of the current position based on the most up-to-date evidence and information available. It is realistic and achievable. As provided in the council's written statement in relation to housing supply² the work undertaken by council officers to ensure the delivery of suitable schemes on the Policy H2 allocated housing sites has been proactive and positive.
- 3.8.2 In particular, it is worth noting that the Trajectory provides for a higher rate of delivery in the first five years, than the five year annualised average requires. This is substantially due to the anticipated delivery rates for the Forge Wood neighbourhood. This build rate has been provided to the council from the developer and work has commenced on site. There are no foreseen reasons why this should not continue to completion in line with those forecast in the Trajectory.
- 3.8.3 However, it is acknowledged that delivery rates have fallen over recent years³ and building back the market confidence may lead to some delays in construction starts for other sites, particularly the town centre apartment schemes which require full build out in a single go when funding can still be difficult to obtain.
- 3.8.4 The council is becoming a more proactive development agent in the delivery of affordable housing, and has a proven track record of assisting affordable housing providers overcome viability challenges. The council also implements its policy to agree to a negotiated reduction in affordable housing where negative viability can be evidenced. This all attests to the council being the first point of 'contingency' to ensure that momentum is maintained and that any identified land opportunities are maximised. Before the downturn in the housing market in 2007/08, the main source of affordable housing and housing delivery in general came from schemes initiated by the private sector, but between 2008 and 2012 the council actively intervened to fill the void in housing delivery left by the private sector and during these years the majority of housing being built was affordable. In the event of housing delivery falling behind the trajectory, the council will again intervene to motivate housing delivery in the understanding of the importance to sustain momentum in the house building sector particularly in light of the long lead-in times and the risk of housing development stalling if momentum is lost. The Affordable Housing Trajectory is set out in Appendix A.
- 3.8.5 While the policy to secure affordable housing on schemes of 10 units or less would have assisted to 'standardise' land values by imposing the same constraints across all

¹ LP080: Crawley Housing Trajectory (2014) CBC

² CBC/004: Council's Response to Inspector's Matter 3: Housing; Issue 2: Housing Supply; para 3.6.1-3.6.11; Appendix B (2015) CBC

³ LP083: Objective Assessment of Crawley's Housing and Economic Needs (OACHEN), Section 4 (2015) Chilmark Consulting

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residential sites and would have ensured Crawley could maintain affordable housing delivery even though there are few larger sites remaining, the fact that National Policy now restricts this option is likely to incentivise the land assembly and delivery of these smaller schemes, which should in turn bolster the windfall sites provision and help meet locally assessed housing needs.

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3.9 Should policy H1 refer to potential delivery of the unmet needs outside the borough? Should exploration of the opportunities for urban extensions adjoining Crawley be included in policy H1?

- 3.9.1 Early drafts of the CBLP proposed a draft H1 policy which included reference to the delivery of the quantum of unmet housing need outside the administrative boundaries within the wider Northern West Sussex and East Surrey Housing Market Area (see Appendix B for an extract of the draft Policy H1, October 2013).
- 3.9.2 However, following informal advice of the Planning Inspectorate (PINS Advisory Meeting, November 2013) it was considered this wording would be outside the scope of the CBLP, as it was inappropriate to include anything within the Policy which was not deliverable through the means of the development control process within the administrative responsibilities of the borough council.
“Policy H1 only applies to development within the borough, therefore the sentence within the policy which confirms the promotion of sites on the edge of Crawley doesn’t reflect the sites outside of the borough boundary. This needs to be in the RJ. This can be tied up with moving the last paragraph in H1 to the RJ, explaining future joint working for the longer term options for extensions to Crawley, and edge of Crawley” (taken from informal CBC Notes of PINs advisory visit, 12 November 2013). This is in line with s17(3) of the Planning and Compulsory Purchase Act 2004 and paragraph 154 of the NPPF.
- 3.9.3 The Plan is intended to be read as a whole; the commentary in the supporting text⁴ and the Reasoned Justification to Policy H1 is clear about the scale of housing need arising from the borough and the level of unmet need which needs to be addressed outside the administrative boundaries of the town, within the housing market area as far as possible. Therefore, the approach proposed by the CBLP is considered sufficient to ensure this unmet need continues to be acknowledged, through future duty to co-operate working and, in particular, the preparation and examination of the Local Plans in the surrounding districts and boroughs.
- 3.9.4 The council has actively looked for opportunities to meet Crawley’s housing needs outside of the borough. This has been achieved in collaboration with Horsham District Council (HDC) at Kilnwood Vale (Land West of Bewbush), through the delivery of an adopted Joint Area Action Plan. 50% of the affordable housing in Kilnwood Vale will be made available to Crawley, which will amount to 340 units over the 1- to 10-year Plan period; with 30% of these to be available to applicants on Crawley’s housing register for rental (102 units). The council is currently in negotiation with St Modwens to secure 50 units on council-owned land within Mid-Sussex, and is in discussions with Mid Sussex District Council (MSDC) to ensure this will be in addition to the number of affordable units that would otherwise be secured by MSDC. There are ongoing discussions with HDC and the development consortium regarding land to the west of Ifield.

⁴ LP001: Crawley Borough Submission Local Plan, para 2.26, para 6.41 (September 2014) CBC

APPENDIX A: AFFORDABLE HOUSING TRAJECTORY



APPENDIX B: POLICY H1 EXTRACT DRAFT CRAWLEY LOCAL PLAN CMT/PORTFOLIO HOLDER VERSION 10 OCTOBER 2013

Housing Provision

The Local Plan seeks to provide 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 Local Plan.

These constraints include historic parks and gardens, conservation areas, sites of nature conservation importance, ancient woodland, structural landscaping, airport safeguarding/aircraft noise, and open space and floodplains, together with the tight relationship between the Built-Up Area Boundary and the borough's administrative boundary which further limits capacity. The exception to this is the potential opportunities which may be found for higher density schemes within a greater mixed use town centre. However, deliverability and viability constraints hinder any significant contribution this may make within the early plan period.

It is therefore recognised that continued cross-boundary working to understand the nature of the wider housing market area is essential to ensure housing needs are being met in an appropriate and functional manner. This is already a long-established means of working, initially through the West Sussex Structure Plan, and more recently with numerous joint evidence base documents (including the joint Strategic Housing Market Area Assessment with Mid Sussex and Horsham District Councils), 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.

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.

All reasonable opportunities will be considered including: brownfield sites; identified 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 3,800 net dwellings in the borough in the period to 2030²⁶. It is anticipated that a substantial proportion of housing delivery will take place within Years 1 – 10 of the plan period, as the North East Sector neighbourhood is developed.

The remaining unmet objectively assessed housing need arising from Crawley, of 4,300 over the Plan period, will be delivered through the Local/District Plans covering the remainder of the Northern West Sussex and East Surrey Housing Market Area, as far as is consistent with planning policies to do so.

Reasoned Justification

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, airport noise and safeguarding constraints. The constrained nature of Crawley's land supply means that a large proportion of the borough's predicted demographic housing needs over

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the next 15 years cannot be met within the borough boundaries and will therefore be accommodated across the wider Northern West Sussex and East Surrey Housing Market Area.

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 delivery, is expected to be significantly lower (as illustrated in the Housing Trajectory and Housing Implementation Plan). This is primarily due to the development of Crawley's new neighbourhood of at least 1,900 dwellings, the North East Sector, 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. The varied nature of housing land supply (and associated housing delivery) over the Plan period make it difficult to identify an annual housing delivery target within Policy H1.

The council has endeavoured to ensure that every opportunity for residential within the borough has been fully considered through the Local Plan process during the Issues and Options, Preferred Strategy and Additional Sites consultation stages. The council has also undertaken specific evidence base studies (such as the Open Space, Sport and Recreation Study, Transport Modelling and Viability Assessment) and in particular, the Urban Capacity Study to identify and assess sites for housing. Any additional sites from this work have been identified within the council's Strategic Housing Land Availability Assessment as being suitable for development and either 'deliverable' in Years 1-5 or 'developable' in Years 6-10 or 11-15. 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 level.

²⁶ This includes the additional 5% buffer within Years 1-5 as required by paragraph 47 of the National Planning Policy Framework as detailed in the council's Housing Trajectory, 30 September 2013