

Contact: **Elizabeth Brigden**  
Direct Line: **01293 43 8624**  
Email: **elizabeth.brigden@crawley.gov.uk**  
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[LondonPlan@london.gov.uk](mailto:LondonPlan@london.gov.uk)

By Email Only

Dear Sir,

Crawley Borough Council (CBC) welcomes the opportunity to comment on the draft London Plan.

### Meeting London's Housing Need

CBC recognises and supports the aim stated in **para. 2.3.1** of the draft Plan commentary 'to accommodate all of London's growth within its boundaries'. This is a particularly important objective given the limited capacity of local planning authorities in the Wider South East to accommodate additional unmet housing need arising from London. This is demonstrated by the difficulty which the Wider South East's Housing Market Areas (HMAs) are experiencing in meeting their own housing need.

For example, the Crawley Borough Local Plan (CBLP) identifies an objectively assessed housing need for Crawley of 675 dwellings per annum (dpa). Over the 15year Plan period this is calculated to be 10,125 dwellings in total. Against this need, the CBLP establishes a land-supply housing requirement of 5,100 dwellings to be delivered within Crawley over the 15year Plan period (averaging 340dpa). This is because of the physical constraints of the borough including its tight administrative boundary around the town's existing urban area; the planned nature and age of the neighbourhoods; and noise and safeguarding constraints associated with Gatwick Airport.

Therefore, Crawley's housing requirement can only meet approximately half of the identified Objectively Assessed Housing Need predicted to arise from within the borough. It is anticipated that when all three LPAs in the North West Sussex HMA (Crawley Borough Council, Horsham District Council, Mid Sussex District Council), have adopted Local Plans, the combined adopted housing requirement for the period to 2030 will only just meet the combined Objectively Assessed Need for the three authorities for the same period.

### Housing Delivery

CBC recognises and supports the ambitious ten-year targets for housing delivery detailed in draft **Policy H1**, noting that these significantly exceed historical levels. Notwithstanding this, it is noted these targets result in an annual shortfall of almost 1,000 dwellings. Please see the comments below regarding Design and Environmental Protection in relation to the question of how it is intended to meet this within London, in line with paragraph 2.3.1 referred to above.

The consideration given to potential funding sources for housing delivery in **chapter 11** of the draft plan is noted, as is the commitment to monitor the supply of homes and affordable homes on an annual basis.

However, CBC suggest that one area of weakness is the lack of a mechanism for triggering review of London Plan policies where housing delivery falls short of the H1 requirement. **Policy H3** sets the monitoring target but is silent on what would be the solution if the targets are shown



Switchboard: 01293 438000  
Main fax: 01293 511803  
Minicom: 01293 405202  
DX: 57139 Crawley 1  
[www.crawley.gov.uk](http://www.crawley.gov.uk)

Town Hall  
The Boulevard  
Crawley  
West Sussex  
RH10 1UZ

to not being met. CBC considers that there is a significant risk of this, given the unprecedented nature of the housing targets and anticipated delivery levels proposed.

On this basis, it is currently not clear from the London Plan what the process will be should London's housing need not be met by delivery within the London boroughs. A clear monitoring framework and risk assessment should accompany the London Plan.

A related issue is coordination between the borough-level housing requirements detailed in **Table 4.1** of the draft London Plan and the development plans being prepared by individual London boroughs. CBC supports the various strands of draft **Policy H1** which seek to make the requirements effective at borough level. However, one potential difficulty is the risk that the H1 targets may become out of date by the time they are incorporated into development plans at borough level. Therefore, CBC emphasise the importance of keeping these under review.

#### Identifying London's Objectively Assessed Housing Need

CBC notes that the draft London Plan is informed by an assessment of London's Objectively Assessed Need for housing based on the GLA's own household projections and methodology. As noted in the London SHMAA, these produce different figures than those which would result from applying the standard method which the government recently set out in the consultation on 'Planning for the Right Homes in the Right Places'. The consultation proposals envisaged the introduction of the standardised method – with provisions for allowable exceptions – in Local Plans to be adopted across England following the publication of the revised National Planning Policy Framework (NPPF) or 31 March 2018, whichever is the later.

The likelihood is then that at the time of adoption of the London Plan, Local Plans being adopted elsewhere in England – including in the Wider South East – will in many cases be using some form of standardised method to assess their housing need. This creates some potential for inconsistencies with regard to the assessment of housing need at the strategic level, both in terms of evidence used and outputs. Consideration of the issue of migration flows between London and other English regions, as advocated in draft London Plan **Policy SD2**, throws this issue into particularly sharp relief.

Against this background, CBC recognises and supports the emphasis which **Policy SD2** places on the need to 'secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE', and to ensure that 'plan-making is, as far as possible, informed by consistent technical evidence'. In pursuit of this aim, it would be welcome if future drafts of the London Plan were to take account of any further measures taken by the government to implement its proposals in respect of the assessment of housing need, and to indicate how the Mayor proposes to approach the strategic assessment of housing need within whatever framework arises from such measures.

#### Design and Environmental Protection

CBC supports the retention of housing standards and design guidance in draft **Policy D4**, among other policies, and supports the general approach of the draft Plan in seeking to ensure that more intensive use of available land should not be incompatible with residential amenity and the accommodation of varied current and future requirements.

However, despite this, it is noted that the proposed ten-year housing requirement for London detailed in draft Policy H1 would leave an annual shortfall of 943 dwellings per annum. Whilst this represents a small proportion of the overall requirement, given the difficulty that there is likely to be in accommodating this need in the areas surrounding London it is queried whether there is the potential for the Plan to go further in meeting the requirement set out in para. 47 of the NPPF to meet 'the full, objectively assessed needs ... as far as is consistent with the policies set out in this Framework'.

In particular, CBC suggests that the proposed balance between the meeting of housing need and the protection of existing designated and other environmental and/or community assets is partly at variance with the approach taken by other authorities, and with the commitment in **para. 2.3.1** that 'as far as possible sufficient provision will be made to accommodate the projected growth within London.'

CBC is particularly mindful of draft **Policy G2**, which gives unqualified protection to the Green Belt. It is accepted that this partly reflects the strong protections granted to the Green Belt

within the NPPF, but CBC notes that a number of Green-Belt-constrained authorities outside of the London boroughs, facing severe housing pressures, are reviewing their Green Belt boundaries in order to ensure that these continue to fulfil the purposes of the Green Belt designation, and to enable the release of land to achieve other key planning objectives where the contribution is poor or negligible.

On a more local level the housing allocations made in the CBLP, with a view to fulfilling the para. 47 requirement, include existing playing field land, land in the countryside and land in a site of nature conservation importance. This includes the delivery of two new neighbourhoods immediately adjacent to the existing built-up area boundary, one of which is located outside the CBC administrative boundaries and has been delivered through a Joint Area Action Plan with the adjoining authority area.

Against this backdrop, CBC considers that there would be legitimate scope for review of the current London Green Belt boundaries. In particular, it is believed that the London Plan, rather than the development plans of individual boroughs, would represent the best framework for a strategic approach to this issue.

### Economic Growth & Strategic Infrastructure Network

Sustainable development and growth are not only a question of housing, and it is recognised that London and the WSE have crucial and complementary economic roles which are central to national prosperity.

Crawley plays a distinctive role within this network, playing host to Gatwick Airport, enjoying direct rail links to London and Brighton, and supporting a significant concentration of economic activity and employment opportunities at the Airport and Manor Royal employment district. CBC contributes to strategic joint working through participation in a number of larger entities, notably the Gatwick Diamond Initiative centres on Gatwick Airport, the Coast to Capital LEP, extending between south London and the coast, and the West Sussex and Greater Brighton Strategic Planning Board.

From this perspective, CBC notes and supports the recognition in draft **Policy SD2** of the mutual benefits of joint working on issues beyond housing, including transport linkages, employment growth, and environmental protection and mitigation.

In addition, the recognition of the Brighton Mainline as a Strategic infrastructure Priority in draft **Policy SD3** is acknowledged and supported. Rail links to London, the coast and to Gatwick Airport play a key role in the borough's economic vitality. As a significant sub-regional economic centre, Crawley is able to provide employment to much of its resident population, but the quality and number of employment opportunities also mean, that the borough experiences a significant volume of in-commuting, including via rail. **Figure 2.13** of the draft London Plan further indicates that between 2,700 and 6,100 Crawley residents were daily commuters to London at the time of the 2011 census – a figure which may easily have increased further since that time as a result of growth in the borough's population. The strategic importance of the M23/A23 corridor between London, Gatwick Airport and the coast should also be recognised in the list of Strategic Infrastructure Priorities. Also, the identification of the North Down Rail Link between Gatwick and Reading is also supported as this provides resilience in access to the Airport.

Notwithstanding this, CBC emphasise that consideration of the capacity of any 'growth locations' within this locality must to be informed by an awareness of local environmental and infrastructural constraints. Therefore, CBC anticipate the opportunity to engage closely in any such exercise.

CBC is concerned at the unqualified reference in **para 10.8.7** of the Plan that the Mayor "*believes that expansion at Gatwick could deliver significant benefits to London and the UK more quickly, at less cost, and with significantly fewer adverse environmental impacts*". In January 2015, in response to the work of the Airports Commission, the Borough Council resolved that the interests of Crawley residents and businesses are best served by the Council objecting to a runway being developed at Gatwick. Without prejudice to this resolution, the Council also identified numerous environmental mitigations and infrastructure requirements should the Commission recommend Gatwick, and the London Plan should qualify its support for expansion at Gatwick with reference to the need to ensure it would not result in "additional

environmental harm”, and for the airport authority and central Government to invest in new infrastructure, as it does for Heathrow.

Crawley Borough Council looks forward to future joint working with the Mayor and Greater London Authority on strategic, cross boundary issues.

Yours Faithfully,

Elizabeth Brigden  
Planning Policy Manager