Crawley Local Plan

Crawley Borough Submission Local Plan 2024 Topic Paper 3:

Housing Needs

Crawley Borough Council

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1. Introduction

1.1 This Topic Paper is part of the evidence base for the Crawley Borough Submission draft Local Plan 2024 – 2040[1]. It clarifies the housing need for Crawley over the Plan period and provides a summary of the technical information on housing need supporting the council's approach to housing which is detailed in the Submission draft Local Plan policies:

- H1: Housing Provision
- H4: Future Housing Mix
- H5: Affordable Housing
- H6: Build to Rent
- H7: Self and Custom Build
- H8: Gypsy, Traveller and Travelling Showpeople Sites
- H9: Houses in Multiple Occupation

1.2 Policy H1: Housing Provision sets a minimum figure for housing provision in the borough over the Plan period, which is supported by the Sustainability Appraisal[2] (SA/SEA). 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. Topic Paper 4: Housing Supply[3] details the evidence to justify this approach. Whilst these two Topic Papers contain overlaps, due to both being about housing provision within the borough, they have distinct purposes. The Housing Supply Topic Paper concentrates primarily on the delivery of housing sites and setting out the reasons why the housing supply can't be further increased. This Topic Paper instead focuses on the specific different types of housing need arising within the borough.

2. Background

2.1 Crawley Borough Local Plan 2015

Objectively Assessed Housing Need

2.1.1 The adopted Crawley Borough Local Plan 2015 established that the Objectively Assessed Housing Need (OAHN) figure for the borough was 675 dwellings per annum[4].

2.1.2 This conclusion was reached based on the technical supporting evidence which accompanied the Local Plan at examination[5], and the Planning Inspector's findings[6]. This was based on the latest population and household projections at that time (2011 Population Projections and 2012 Household Estimates) and 2011 Census data. It brought together the full range of influences on the level of housing need arising in

[1] Submission Draft Crawley Borough Local Plan (May 2023) CBC
[2] Crawley Sustainability Appraisal/Strategic Environmental Assessment (2023) CBC
[3] Topic Paper 5: Housing Supply (2023) CBC
[4] Crawley 2030: Crawley Borough Local Plan, paragraphs 6.11 – 6.13 (2015) CBC
https://crawley.gov.uk/sites/default/files/documents/PUB271853.pdf
[5] Objective Assessment of Crawley's Housing and Economic Needs (March 20015) Chilmark Consulting Ltd.
https://crawley.gov.uk/sites/default/files/documents/PUB243595.pdf
[6] Report on the Examination into Crawley Borough Local Plan 2015-2030, paragraphs 20-30 (2 November 2015) Inspector Martin Pike BA MA, MRTPI, The Planning Inspectorate
https://crawley.gov.uk/sites/default/files/documents/PUB270981.pdf

the borough, including natural growth, economic growth, migration, supressed demand from previous years, vacancy rates and affordable and market housing signals. Under-provision in previous years was spread evenly across the whole Plan period.

2.1.3 The annual OAHN was multiplied by the number of years in the Plan period to establish a total housing need requirement for the Local Plan of 10,125 dwellings between 2015 and 2030.

Affordable Housing Need

2.1.4 The adopted Local Plan highlighted that house prices had grown significantly since 2001, increasing by over 7% in the period to March 2013, whilst, at the same time, average household earnings in the borough remained relatively low when compared with adjoining authorities. Evidence in the Strategic Housing Market Assessment[7] concluded that: (i) about 56% of emerging households were unable to afford Affordable Rent at 80% of market rent values without further assistance; and (ii) that 31% of households would require assistance to be in a position to afford rentals set at Social Rent levels, which is based on the differential of local rent relative to local incomes; and (iii) 62% of households are unable to purchase, based on the differential of local prices and rent levels relative to local incomes.

2.1.5 On this basis, the adopted Local Plan set a requirement of 40% affordable housing from all residential developments. Of this, a minimum of 70% is expected to be in the form of Affordable Rent, or Social Rent where other forms of subsidy exist, and up to 30% Intermediate Tenure. Intermediate Tenure was defined in the 2015 adopted Plan as including: Shared Ownership, Shared Equity, Discounted Market Rent, Rent to Buy and First Buy products[8].

2.1.6 In addition to the 40% Affordable Housing requirement, the adopted Local Plan established an additional expectation for a further 10% of housing to be in the form of Low Cost Housing, offering up to 10% discount to first-time buyers, for developments of 15 dwellings or more. Low Cost Home Ownership was acknowledged to fall within the private housing quota because it was a one-off discount, rather than providing an affordable product in perpetuity. It sought instead to create an additional tier of assistance to people entering the housing market for the first time.

Gypsy, Traveller and Travelling Showpeople Accommodation Needs

2.1.7 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment undertaken in 2013-14[9] confirmed there were two authorised Gypsy and Traveller sites in Crawley, for four pitches in total, and one authorised site for Travelling Showpeople with three plots, with a more substantial local population living within bricks and mortar accommodation.

[7] Strategic Housing Market Assessment: Affordable Housing Needs Update (2014) Chilmark Consulting https://crawley.gov.uk/sites/default/files/documents/PUB231420.pdf
[8] Crawley Borough Local Plan 2015 – 2030, paragraph 6.67 (2015) CBC https://crawley.gov.uk/sites/default/files/documents/PUB271853.pdf
[9] Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2014) CBC https://crawley.gov.uk/sites/default/files/documents/PUB228452.pdf

2.1.8 The survey work undertaken did not identify any immediate need for additional sites. However, the Assessment concluded that there was a need to plan for a potential need of up to ten pitches for Gypsies and Travellers arising from the existing population within Crawley. On this basis, the Local Plan allocated a reserve Gypsy and Traveller site for up to ten pitches to meet the future needs of the existing population within Crawley. The Broadfield Kennels site, to the southwest of the A264, was identified as being 'developable' in years 6-10 or 11-15 of the Plan period.

Houses in Multiple Occupation

2.1.9 Houses in Multiple Occupation (HMOs) provide a much-needed source of housing supply in the borough, and in particular represent the only affordable means by which many younger adults in Crawley can live with a degree of independence, thereby meeting a specific need. However, they can be associated with more intense patterns of activity than homes inhabited by a single household, and as such they are subject to specific forms of regulation.

2.1.10 Most 'standard test' HMOs arise through the change of use of ordinary residential dwellings (in Use Class C3). Such conversions required planning permission as a matter of course until reforms in 2010 created the C4 Use Class to cover 'small' HMOs of three to six people, and created a national permitted development right for changes of use between the C3 and C4 Uses. HMOs occupied by seven or more people remain a separate 'sui generis' ('class of its own') use, and still require planning permission.

2.1.11 Where HMOs require planning permission, proposals are assessed against national and local planning policies. Policy H6 of the adopted Local Plan specifically relates to HMOs, setting out criteria regarding the appropriateness of the location; impact on the character of the area and the amenity and privacy of neighbouring properties; and whether the proposal meets its operational needs, including servicing and parking. Proposals concerning HMOs are also assessed against other relevant Local Plan Policies, relating to matters such as general servicing requirements and parking standards.

2.2 National Policy

Objectively Assessed Housing Need

2.2.1 The National Planning Policy Framework 2021 (NPPF) requires Local Plans to provide for objectively assessed needs for housing[10]. Strategic policies should set out an overall strategy for the pattern, scale and quality of places, and make sufficient provision for housing (including affordable housing)[11]. In order to determine the minimum number of homes needed, the NPPF confirms the strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance[12]. Strategic policy-making authorities should establish a housing requirement for their whole area, which shows the extent to which their identified housing need can be met over the plan period[13].

[10] National Planning Policy Framework, paragraph 11 (2021) MHCLG https://www.gov.uk/government/publications/national-planning-policy-framework--2
[11] National Planning Policy Framework, paragraph 20a (2021) MHCLG
[12] National Planning Policy Framework, paragraph 61 (2021) MHCLG
[13] National Planning Policy Framework, paragraph 66 (2021) MHCLG

2.2.2 The national Planning Practice Guidance establishes the Standard Method for calculating overall Housing Need[14]. This confirms that the overall housing need is a starting point for determining the final housing requirement for an area and the figure will need to be updated during the course of a Plan's preparation to take into account any updates to the data inputs:

"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations."
Paragraph: 001 Reference ID: 2a-001-20190220

"*The standard method… identifies a minimum annual housing need figure. It does not produce a housing requirement figure.*"
Paragraph: 002 Reference ID: 2a-002-20190220

"*Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.*

"*The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities.*"
Paragraph: 008 Reference ID: 2a-008-20190220

Specialist Housing Needs for Different Groups

2.2.3 The NPPF requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies. This includes (but is not limited to) those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.

2.2.4 The NPPF confirms that planning policies must specify the type of affordable housing required, using the definitions set out in the Framework, and expect it to be met on-site (unless it can be otherwise justified)[15]. Affordable Housing definitions set out in the NPPF include the following:

- Affordable Housing for Rent;
- Starter Homes;
- Discounted Market Sales Housing (sold at least 20% below local market value and remains at a discount for future eligible households);
- Other Affordable Routes to Home Ownership (including Shared Ownership, Equity Loans, other Low Cost Homes for Sale (at a price at least 20% below local market value) and Rent to Buy.

2.2.5 The NPPF states that provision of affordable housing should not be sought for residential developments that are not major developments. Furthermore, to support the re-use of brownfield land, where vacant buildings are being reused or

[14] Planning Practice Guidance: Housing and Economic Needs Assessments (regularly updated) MHCLG https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments
[15] National Planning Policy Framework, paragraph 63 (2021) MHCLG

redeveloped, any affordable housing contribution should be reduced by a proportionate amount (equivalent to the existing gross floorspace of the existing buildings) except where vacant buildings have been abandoned[16].

2.2.6 Where major development involving the provision of housing is proposed, the NPPF requires planning policies and decisions to expect at least 10% of the homes to be available for affordable home ownership, unless this would significantly prejudice the ability to meet the identified affordable housing needs of specific groups[17].

2.3 Evidence

2.3.1 Key Evidence supporting the draft Local Plan includes:

- Standard Methodology for Assessing Local Housing Need (February 2019) MHCLG
- Northern West Sussex Strategic Housing Market Assessment (2019) Iceni Projects
- Crawley Borough Council: Windfall Allowance Statement (May 2023) CBC
- Local Plan and Community Infrastructure Levy Viability Study (2020) DixonSearle
- Viability Study Update (2022) DixonSearle
- Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2023) CBC

2.3.2 The Strategic Housing Market Assessment (SHMA) considered the specialist housing needs for different groups in the community, including those for:

- Those in affordable housing need;
- Older People and those with Disabilities;
- Families;
- Younger People;
- Self- and Custom-Build.

2.3.3 The relevant evidence is referenced below in support of the Strategic Issues.

3. Strategic Issues

3.1 Objectively Assessed Housing Need

3.1.1 Crawley's total annual housing need figure for 2023, based on the Standard Method, is 755 dwellings per year.

Table 1: MHCLG Standard Method Housing Need Calculation

Households 2023	49,653
Households 2033	55,333
Change in Households	5,680
Per Annum Change	568
Affordability Ratio (2022)	9.27
Affordability Uplift to Household Growth	32.94%
Total Need (dwellings per annum)	**755**

[16] National Planning Policy Framework, paragraph 64 (2021) MHCLG
[17] National Planning Policy Framework, paragraph 65 (2021) MHCLG

3.1.2 The total housing need arising from Crawley over the Plan Period (2024 – 2040) will be 12,080 dwellings[18].

3.1.3 As set out in Topic Paper 4: Housing Supply, due to a constrained land supply, Crawley is unable to meet its full OAHN within its boundaries. The minimum housing level identified in Local Plan Policy H1, based on land supply is identified as 5,030 net dwellings including windfalls.

3.1.4 The council's approach to addressing the outstanding unmet housing needs of 7,050 dwellings is set out in Topic Paper 1: Unmet Needs and the council's Duty to Cooperate Statement. The SHMA recommends that developments close to at Crawley's boundaries should take into account the conclusions of the SHMA regarding the nature of the housing need in Crawley, including the need for different types and sizes of housing[19]. The Duty to Cooperate process is being advanced with these discussions, as set out in Topic Paper 1. In particular, these conversations relate to:

- Meeting overall unmet housing needs;
- Blended Housing Mix for sites on Crawley's boundaries;
- Meeting affordable housing needs (percentages, tenure mix and nomination rights);
- Self- and Custom-Build.

3.2 Housing Mix

3.2.1 The SHMA looked at the needs of particular groups in the local community, including families and younger people. Crawley has a notably higher proportion of households with dependent children than the other areas in the study (Horsham and Mid Sussex districts), at 33% of households[20]. The most prevalent existing housing stock in Crawley is two and three bedroom properties. The strength of the flatted market in recent years together with permitted development rights have seen high levels of new flatted development and the SHMA noted there is a restricted mix and choice of housing in Crawley for family households in both market and affordable sectors[21].

3.2.2 Crawley currently has a higher proportion of younger people (30% of total households) than the rest of the Housing Market Area (HMA) and a housing stock which is more focused towards smaller and more affordable homes. Crawley is projected to see a growth of 17% in younger households aged under 40 over the 2019 – 2039 period[22]. The main issue affecting younger households is housing affordability.

3.2.3 The SHMA concluded that the overall number of service personnel living in the Northern West Sussex HMA represents a very small proportion of the total population aged 16+, as there is a limited military presence in the locality, and the

[18] 755dpa x 16 years = 12,080 dwellings
[19] Northern West Sussex Strategic Housing Market Assessment, Housing Need Implications, page 59 (November 2019) Iceni Projects
[20] Northern West Sussex Strategic Housing Market Assessment, paragraph 9.2, page 111 (2019) Iceni Projects Limited
[21] Northern West Sussex Strategic Housing Market Assessment, page 120 (2019) Iceni Projects Limited
[22] Northern West Sussex Strategic Housing Market Assessment, page 110 (2019) Iceni Projects Limited

housing needs of these families are included within the overall housing need for the HMA.

3.2.4 In 2011, according to Census data, there were 2,490 full-time students aged between 16 and 74 in Crawley (3% of the overall population). Students predominantly live with their parents (79%). Only a very small amount of the student population live in a communal establishment or an all student household. The SHMA concluded that there are modest numbers of students resident in Crawley who have particular housing needs, and the evidence does not suggest any substantive interventions or purpose build housing provision is necessary[23].

3.2.5 No demand for communal living products was identified for Crawley. However, the SHMA highlighted the benefits around communal living in housing delivery terms, and suggested there is potential for community-led housing schemes, including co-living/buying schemes to come forward in the HMA and to contribute positively to housing delivery.

3.2.6 The SHMA looked at the existing housing stock alongside the household projections[24], and concluded the following mix of housing sizes would be required to meet the needs of the borough[25]:

Table 2: Crawley Borough-Wide Recommended Housing Mix (SHMA, 2019)

	Affordable Housing Element: Affordable Rented	***Affordable Housing Element: Affordable Home Ownership***	***Market Housing Element (Private Sale and Private Rent)***
1 Bed	*30%*	*25%*	*10%*
2 Bed	*30%*	*35%*	*25%*
3 Bed	*30%*	*30%*	*40%*
4+ Bed	*10%*	*10%*	*25%*

3.2.7 However, mindful of the nature of higher density Town Centre residential schemes and the relative attractiveness of the Town Centre for younger and potentially older households, the SHMA recommended the following Town Centre mix[26]:

Table 3: Crawley Town Centre Recommended Housing Mix (SHMA, 2019)

	Town Centre
1 Bed	*25% - 30%*
2 Bed	*40% - 45%*
3 Bed	*25%*
4+ Bed	*5%*

[23] Northern West Sussex Strategic Housing Market Assessment, paragraphs 8.84 – 8.96, page 110 (2019) Iceni Projects Limited
[24] Northern West Sussex Strategic Housing Market Assessment, paragraph 11.3 and Table 67, pages 135 – 136 (2019) Iceni Projects Limited
[25] Northern West Sussex Strategic Housing Market Assessment, paragraphs 11.25, 11.29 and 11.31, pages 141 – 142 (2019) Iceni Projects Limited
[26] Northern West Sussex Strategic Housing Market Assessment, paragraphs 11.38 – 11.39, page 143 (2019) Iceni Projects Limited

3.2.8 Policy H4 of the draft Local Plan proposes the following mix:

Table 4: Policy H4: Future Housing Mix (paragraph 13.14)

	Market Housing Element (Private Sale and Private Rent): Town Centre	***Market Housing Element (Private Sale and Private Rent): Borough-Wide***	***Affordable Housing Element (Intermediate and Rental Tenure): Town Centre & Borough-Wide***
1 Bed	*25% - 30%*	*10%*	*25% - 30%*
2 Bed	*40% - 45%*	*25%*	*30% - 35%*
3 Bed	*25%*	*40%*	*25% - 30%*
4+ Bed	*5%*	*25%*	*5% - 10%*

3.2.9 Policy H4 sets out the approach for considering dwelling mix in relation to applications for individual residential schemes. It acknowledges that the 'appropriate mix of house types and sizes for each site will depend upon the size and characteristics of the site and the viability of the scheme'. At the same time it confirms that 'consideration should be given to the evidence established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley', and that for affordable housing 'the need for one, two and three bedroom affordable dwellings in Crawley, as identified in the Strategic Housing Market Assessment and its updates, should be addressed in meeting the housing needs of those considered to be in greatest need'. The Policy further states that the proposed mixes set out for private and affordable tenures are the 'expected starting point. As such the viability testing of residential typologies and sites has been based on these indicative mixes.

3.2.10 While the Policy does not seek to rigidly apply the mixes set out in Table 4 above on a site-by-site basis, it is important to avoid a risk that individual schemes simply disregard these proposed mixes, leading to a situation whereby housing delivery cumulatively does not meet identified local demand and need. For this reason, the policy proposes a 'Housing Mix Test', as a baseline requirement for considering the appropriate housing mix within major developments. For each tenure of 5 dwellings or more within the scheme the test identifies a reference point in the form of the median dwelling size in a notional development of equivalent size which conformed to the indicative mix. The test then seeks to ensure that neither the proportion of dwellings within the tenure which are smaller than the median, nor the proportion which are larger, exceeds 90%.

3.2.11 As set out in the Policy, this test would be assessed against the mixes in Table 4 or against any updated position set out in the council's AMR to take new delivery into account. This would operate on the basis of an assessment of delivery against demand and need. For this purpose, demand and need would be defined in terms of Crawley's objectively assessed need, broken down into dwelling sizes in accordance with Table 4, and split between market and affordable tenures in line with assumptions made within the SHMA modelling.

3.3 Affordable Housing Need & Viability

3.3.1 The lower quartile house prices in Crawley are 10.7 times earnings[27]. Whilst this is below the Housing Market Area and West Sussex average, it is substantially higher than the national (England) average (see Table 5).

Table 5: Ratio of Lower Quartile Prices to Lower Quartile Earnings 2018

	Crawley	Northern West Sussex HMA	West Sussex	England
2018	10.70	12.70	12.19	7.29

3.3.2 Crawley has a very important role in the sub-regional economy, and has been identified as being well located to support the delivery of economic growth. Much of the workforce in the lower-paid, but essential, posts locally, including at Gatwick Airport, also reside within the borough. This forms a critical relationship with the housing stock. A reduction in the supply of affordable housing would exacerbate the current under supply and would provide a disincentive for business relocation to the area. The effects of COVID-19 on the borough has been highlighted by the Centre for Cities report[28], highlighting how vulnerable the borough's workforce is to such wider economic issues, particularly any impact on the aviation sector.

3.3.3 The Updated SHMA found that the affordable housing need in Crawley equated to a total of 739 affordable homes per year, of which 563 (76%) dwellings were needed as rented affordable homes, and 176 (24%) dwellings were needed to be provided for affordable home ownership[29].

3.3.4 The Submission draft Crawley Borough Local Plan requires 40% of housing developments outside of the town centre to be affordable. Of these, 75% should be in the form of Affordable/Social Rent (i.e. 30% of the total dwellings) and 25% in the form of Intermediate Tenures and or Affordable Home Ownership tenure (i.e. 10% of the total dwellings)[30].

3.3.5 The proportions of the tenure split relates directly to the evidence identified by the SHMA (see para. 2.2.3 above). However, this related to the total affordable housing need of 739 dwellings per annum. Crawley's total housing need, identified through the standard method, is 755 (see para. 2.3.1); this includes an uplift to address affordability as part of the calculation. In order to meet Crawley's affordable housing need in full using the standard method as a total housing requirement, 98% of all housing development in Crawley would need to be provided as affordable tenures.

3.3.6 Alternatively, retaining the 40% requirement across all new residential developments within the borough, in order to meet the full affordable housing requirement, the

[27] Northern West Sussex Strategic Housing Market Assessment, paragraph 6.29, Table 31, page 70 (2019) Iceni Projects: https://crawley.gov.uk/sites/default/files/documents/PUB354604.pdf

[28] Centre for Cities (2020) What does the Covid-19 crisis mean for the economies of British cities and large towns? https://www.centreforcities.org/blog/what-does-the-covid-19-crisis-mean-for-the-economies-of-british-cities-and-large-towns/

[29] Northern West Sussex Strategic Housing Market Assessment, Table 67, page 156 (2019) Iceni Projects Limited https://crawley.gov.uk/sites/default/files/documents/PUB354604.pdf

[30] Submission Draft Crawley Borough Local Plan (October 2020) CBC

total number of dwellings required per annum would be 1,848[31]. This level of provision has been assessed as part of the SA/SEA[32].

3.3.7 Meeting the needs of private market housing is not confined by boundaries, and buyers have the freedom to choose where they wish to live and invest, where Crawley's lower land prices and good connectivity relative to surrounding housing markets attracts inward investment thereby inevitably contributing towards meeting the private housing needs of surrounding markets. By contrast, affordable housing is confined to within the borough, with insufficient cross-boundary nominations available, meaning that inevitably meeting local affordable housing needs is almost entirely reliant on securing the necessary 40% quota on all residential developments within the borough, and is otherwise dependent on neighbouring authorities formally agreeing to assist in meeting this evidenced affordable housing shortfall.

3.3.8 As explained in Topic Paper 4: Housing Supply, Crawley is unable to meet its full OAHN within its boundaries. The Crawley Borough Submission draft Local Plan 2024-2040 commits to meeting 42% of the overall housing need, of which 40% outside the Town Centre would be required to be in the form of affordable housing. The table below shows the scale of the unmet housing needs, including breaking this down for the affordable housing need and the sub-tenure split within that. The figures assume 40% affordable housing is secured for all new residential developments within the borough.

Table 6: Unmet Affordable Housing Needs

	Full Need (2024 – 2040)	**Provision in Crawley Borough Local Plan (2024 – 2040)**	**Unmet Needs (2024 – 2040)**
Overall Housing Need	12,080 dwellings (755dpa)	5,030 dwellings (314dpa)	7,050 dwellings (441dpa)
Affordable Housing Need (40%)	11,824 dwellings (739 dpa)	2,012 dwellings (126 dpa)	9,812 dwellings (613 dpa)
Affordable Rental Housing Needs (30%)	8,868 dwellings (554.25 dpa)	1,509 dwellings (94 dpa)	7,359 dwellings (460 dpa)
Affordable Intermediate Housing Needs (10%)	2,956 dwellings (184.75 dpa)	503 dwellings (32 dpa)	2,453 dwellings (153 dpa)

3.3.9 This table highlights that, assuming 40% affordable housing is secured from all new housing developments within the borough, it would only be possible to meet 17% of the total affordable housing need (126dpa compared to the need of 739dpa identified in the SHMA).

3.3.10 An independent Viability Assessment has been undertaken to support the Local Plan preparation in line with the NPPF's paragraph 34 and the advice in the Planning

[31] Northern West Sussex Strategic Housing Market Assessment, Table 44, page 88 (November 2019) Iceni Projects: https://crawley.gov.uk/sites/default/files/documents/PUB354604.pdf

[32] Crawley Sustainability Appraisal/Strategic Environmental Assessment, Appendix E, pages 203 – 206 (2020) CBC

Practice Guidance: Viability[33]. This has been carried out to advise on whole-plan viability, affordable housing viability and Community Infrastructure Levy. The results from this have directly fed into the considerations for new Local Plan policies on affordable housing. This Assessment has concluded that for greenfield sites and borough-wide mixed housing developments across the borough, 40% affordable housing is achievable alongside the other policy requirements of the Local Plan and Community Infrastructure Levy contributions. However, it highlighted serious concerns with the viability of higher density residential schemes within the Town Centre, due to the higher existing land values and the higher costs associated with construction of high rise developments.

Town Centre Schemes

3.3.11 To reflect the issues identified by the Viability Study, for residential development within the Town Centre, 25% affordable housing is required by Policy H5 of the Submission Draft Crawley Borough Local Plan. This is to be split on a 60/40 basis, with 15% to be affordable or social rent, and 10% to be shared-ownership in the first instance, otherwise shared-equity or affordable home ownership under agreed viability scenarios.

3.3.12 The Submission draft Local Plan[34] anticipates a minimum of 2,087 dwellings (not including windfalls) will come forward within the Town Centre over the period 2021 - 2040, comprising 36% of the total net supply of housing identified for that period (total of 5,873 dwellings). The anticipated delivery within the Town Centre over the Plan period (2024 – 2040) is 1,865 dwellings out of the total supply 5,030 dwellings (37%).

3.3.13 In addition, due to the higher densities being required by draft Policy CL4 for brownfield development sites within eight minutes walking distance from Crawley rail and bus station and Town Centre Fastway stops, it is expected the largest proportion of windfalls expected over the Plan period will occur within the Town Centre.

3.3.14 As the viability of Town Centre development means only 25% affordable housing can be secured from these developments, this will substantially reduce the amount of affordable housing able to be secured from market-led housing developments. Without counting windfalls, the level of affordable housing which could be secured based on the Local Plan policy would be 1,732 dwellings (see Table 7 below). This represents 15% of the total affordable housing need (108dpa compared to the need of 739dpa identified in the SHMA).

[33] Planning Practice Guidance: Viability (updated regularly, last updated 1 September 2019) MHCLG: https://www.gov.uk/guidance/viability

[34] Draft Submission Crawley Borough Local Plan, paragraph 2.23, footnote 15 (May 2023) CBC

Table 7: Total Anticipated Affordable Housing Provision based on known Town Centre Housing Delivery

	Local Plan Anticipated Housing Delivery (Total Dwellings)	Affordable Housing Local Plan Policy Requirement (%)	Affordable Housing Provision (Dwellings)	Affordable Housing Provision (dpa)
Housing delivered outside the Town Centre	3,165	40	1,266	79
Housing delivered within the Town Centre	1,865	25	466	29
Total Housing delivered	**5,030**		**1,732**	**108**

3.4 Affordable Housing: Small Sites

3.4.1 Policy H5 (Affordable Housing) requires the delivery of affordable housing (or financial contributions) from all residential development in the borough, including small sites. This is because of the high levels of affordable housing need, as set out above, and because of the increasing importance small sites will play in housing delivery over the Plan period, as set out below.

3.4.2 The administrative boundaries of Crawley are drawn tightly around the town, with very little land falling outside of the Built-Up Area Boundary (BUAB). The M23 motorway forms the administrative boundary to the east of the town, and to the south, lies the High Weald Area of Outstanding Natural Beauty (AONB). To the west, a new neighbourhood at Kilnwood Vale is under construction and to the north of this the land adjacent to the borough boundary leads to open countryside within Horsham District, where Homes England are promoting strategic scale residential development. Gatwick Airport is located in the north of the borough; constraining the land between the north of the town and the airport through safeguarding requirements for a potential second runway and unacceptable noise levels for residential uses.

3.4.3 Crawley was designated as a New Town in 1947 and has had continual phased development of neighbourhoods, each with their own centre offering retail/employment and community facilities. Some of the newer neighbourhoods (Maidenbower, Bewbush and Broadfield) have more limited capacity to provide additional housing, given the higher density of new housing within these neighbourhoods which already offers a more efficient use of land with less potential for infilling with larger housing developments.

3.4.4 A number of smaller housing schemes have been delivered on brownfield sites in the past ten years and have come forward predominantly from the older residential neighbourhoods of Crawley close to the Town Centre such as Southgate, Northgate and Three Bridges. This is where the older residential stock is more appropriate for redevelopment either through the conversion of residential dwellings or offices, or

through the demolition of existing buildings and garden land and the construction of new dwellings.

3.4.5 Over the period 2010/11 – 2022/23, a total of 492 dwellings (451 net) have been delivered on 175 separate sites of 10 dwellings or less. These are set out in Appendix A. The overview of this in the context of total completions can be seen in Table 8 below.

Table 8: Gross Completions 2010/11 – 2022/2023

Monitoring Year	Gross Completions Total	Gross Completions on Sites of 10 units or less	Gross Completions on Sites of more than 10 units	Small Sites as % of Gross Delivery
2010/11	386	35	351	9%
2011/12	204	22	182	11%
2012/13	84	21	63	25%
2013/14	197	61	136	31%
2014/15	227	54	173	24%
2015/16	544	50	494	9%
2016/17	603	69	534	11%
2017/18	372	34	338	9%
2018/19	515	54	461	10%
2019/20	456	8	448	2%
2020/21	571	32	539	6%
2021/22	359	32	327	9%
2022/23	170	20	150	12%
2010-2023	**4,688**	**492**	**4,196**	**10%**

3.4.6 Planning permissions provide an indication of those small sites anticipated to come forward in the next three year period.

Table 8: Commitments 2010/11 – 2022/23

Monitoring Year	Gross Permissions Total	Gross Permissions on sites of 10 units or less	Gross Permissions on sites of more than 10 units	Small Sites as % of Gross Permissions
2010/11	2060	22	2038	1%
2011/12	254	23	231	9%
2012/13	87	59	28	68%
2013/14	528	54	474	10%
2014/15	332	40	292	12%
2015/16	834	66	477	8%
2016/17	681	41	640	6%
2017/18	467	55	412	12%
2018/19	364	37	327	10%
2019/20	217	32	185	15%
2020/21	244	27	217	11%
2021/22	127	23	104	18%
2022/23	2	2	2	100%
2010-2023	**6197**	**481**	**5427**	**8%**

3.4.7 The large sites within the borough boundary are finite, with Forge Wood, currently under construction in the North East of the borough, being the last neighbourhood scale development possible as the land available for housing is limited. Therefore, in future, there will be far greater reliance on small sites to help meet Crawley's housing needs. The Housing Trajectory for the Local Plan anticipates 100 dwellings per annum to come forward through windfalls over the Plan period. A high proportion of these will be on smaller sites, including 15dpa of 1-4 dwellings alone[35]. The importance of small sites particularly in low delivery years can be seen in the monitoring year 2012/13 during which they formed 68% of permissions, and in 2022/23, whilst the borough has been subject to restrictions relating to water neutrality, they form 100% of permissions. This will be increasingly the case over the Plan period as the known and allocated larger sites within the borough are developed.

3.4.8 The contribution these sites make to delivering the essential housing supply is increasingly critical, and without the proportionate contribution for affordable housing, where viability allows, the ability of the council to even partially address its unmet affordable housing need would be limited further.

3.4.9 Small residential developments permitted following the adoption of the existing Local Plan (December 2015) have resulted in a total maximum requirement of up to 113 affordable houses[36], subject to viability. In practice, over these seven years, the permitted small sites have secured a combined financial contribution total of £736,743 toward affordable housing, as well as the delivery of five discounted market rent dwellings within private schemes. Whilst small, any contribution to helping address Crawley's substantial need for affordable housing is important and the amount reflects the proportionate approach the council takes to applying the policy requirement to ensure housing delivery is not adversely affected. Appeal decisions[37] have supported the adopted Policy approach, when considered against the weight of the NPPF paragraph 63.

3.4.10 As expressed above, the increasing reliance on smaller housing developments will increase the percentage of affordable housing contributions and small sites affordable housing will become increasingly important to the overall delivery of affordable housing in the borough.

3.4.11 In line with guidance set out in the National Planning Policy Framework (NPPF), paragraphs 20a and 61, Crawley Borough Council's emerging Local Plan seeks to address the identified affordable housing need, taking account of the Viability Assessment.

[35] Crawley Borough Council: Windfall Allowance Statement (May 2023) CBC

[36] 40% of 283 dwellings on sites 10 units or below (2015/16-2022/23) = 113.2 dwellings

[37] 37 Queens Square, Northgate – Appeal Ref: APP/Q3820/20/3265573 (18 June 2021); Turks Croft, Rusper Road, Ifield – Appeal Ref: APP/Q3820/W/19/3243915 (22 January 2021); 5 The Boulevard, Northgate – Appeal Ref: APP/Q3820/W/20/3245862 (5 June 2020); 39A High Street, Northgate – Appeal Ref: APP/Q3820/W/19/3236572 (23 January 2020); Woodend, Forge Wood, Pound Hill – Appeal Ref: APP/Q3820/W/19/3221950; Land off Worth Way, Field Gate, Worth – Appeal Ref: APP/Q3830/W/19/3224604; 142 Three Bridges Road, Three Bridges – Appeal Ref: APP/Q3820/W/18/3201383; 11 Wakehams Green Drive – Appeal Ref: APP/Q3820/W/18/3194938

3.4.12 The Viability Assessment considered that all development, outside the Town Centre, remains viable across the borough with a 40% affordable housing provision (75/25 tenure split). **It was not found that smaller developments had significantly greater levels of viability constraints.**

3.4.13 Having an affordable housing requirement on all residential developments, regardless of scale, also ensures parity in land values, rather than a situation where land vendors of smaller sites benefit from the absence of affordable housing. To address the concerns of a disproportionate burden on small sites, the council's approach has been to gradually increase the burden on a sliding scale ratcheting up to the full 40% requirement on sites of 10 units or more. In addition, any commuted payments received from these smaller developments assists to enable the provision of affordable housing on larger schemes that may experience viability challenges.

3.4.14 In the case of Crawley, all evidence has shown that it is not the case that affordable housing requirements on small sites prevent their development. Therefore, the national restriction on securing affordable contributions from schemes of 10 units or less goes against the Viability work undertaken at a local level to support the council's Local Plan. The Local Plan Policy H5 allows for the relaxation of the policy in part or in full in exceptional circumstances where a scheme is clearly subject to abnormal costs, not including land costs, not otherwise envisaged by the Viability Assessment.

3.4.15 It considered there are such strong local factors which relate specifically to Crawley, both in the national, regional and local context, which require a different approach to the national position. On this basis, addressing the disproportionate burdens and incentivising smaller housing development should be considered through the implementation of the Policy requirement, at a local level as part of negotiations with developers on planning obligations. Factors which will be taken into account will include:

- Support and guidance on viability assessments;
- Taking into account economies of scale;
- The way financial contributions are calculated; and
- When the financial contributions may be paid.

3.4.16 Furthermore, when Crawley's Community Infrastructure Levy (CIL) rate was introduced in August 2016 it was set at a lower level than any figures provided by the 2015 Viability Study, at £100/sqm, in order to reflect the priority of affordable housing within the borough and to reduce the burden on developers and reduce the risk of any development not progressing. There were no objections to the CIL rate at examination and the CIL Inspector concluded the range of sites tested was thorough and comprehensive, with affordable housing cost assumptions modelled at the full Crawley Borough Local Plan 2015 level and tenure mix (40% affordable and an additional 10% low cost housing), and that the evidence confirmed that the proposed CIL charge could be readily accommodated, alongside the affordable housing cost assumptions, and did not pose any risk to scheme viability. The index linked increase in this CIL rate (now £122.88 per square metres for residential developments) has been taken into account in the 2020 Viability Assessment. CIL will be reconsidered

following the final adoption of the Local Plan policies to address any residual impacts identified.

3.5 Affordable Housing: Care and Residential Homes

3.5.1 The Strategic Housing Market Assessment (SHMA) highlights Crawley has a lower proportion of owner occupier older person households than other parts of the housing market area (60% in Crawley compared to 75% in Horsham) and they are also more likely than any other households to be in the social rented sector (29.3% of older person households in Crawley). In particular, single older people have a much lower level of owner-occupation than larger older person households (51.5% compared to 71.0%), with a much higher proportion living in the social rented sector (35.8% of single older person households in Crawley). Only 2% of older person households in Crawley live in the private rented sector[38].

3.5.2 With regards to people with a long-term health problem or disability (LTHPD), the analysis for the SHMA showed that people with a LTHPD are more likely to live in social rented housing (35.7% with a LTHPD compared to 20.8% without a LTHPD). Given that typically the lowest incomes are found in the social rented sector, the analysis would suggest that the population/households with a disability are likely to be relatively disadvantaged when compared to the rest of the population[39]. In addition, the SHMA has highlighted that people living in the social rented sector are almost twice as likely to have a LTHPD than those in other tenures (22.4% of social rent with LTHPD compared to 12% of other tenures with LTHPD) [40].

3.5.3 The SHMA calculated that the population increase of people with a LTHPD in Crawley represents 26% of the total increase in the population estimated by the projections. Furthermore, there is projected to be a large rise in the number of people with dementia, with an increase of 68% in Crawley to 2039, along with an increase in the number of people with mobility problems of 63% in Crawley[41]. The SHMA found the number of people with a limiting long-term health problem or disability is projected to increase in the period to 2039 by 7,000 in Crawley.

3.5.4 The SHMA considered both the projected need for specialist accommodation for older persons and the existing supply within the borough. In Crawley, the SHMA identified an apparent surplus of affordable sheltered housing but a shortfall of all other types and tenures[42]. The SHMA identified the following need for specialist housing for older persons in Crawley[43]:

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[38] Northern West Sussex Strategic Housing Market Assessment, paragraph 10.8, page 122 (November 2019) Iceni Projects: https://crawley.gov.uk/sites/default/files/documents/PUB354604.pdf

[39] Northern West Sussex Strategic Housing Market Assessment, paragraph 10.14, page 125 (November 2019) Iceni Projects

[40] Northern West Sussex Strategic Housing Market Assessment, paragraph 10.15 and Table 61, pages 125-126 (November 2019) Iceni Projects

[41] Northern West Sussex Strategic Housing Market Assessment, paragraph 10.17 and Table 62, page 126 (November 2019) Iceni Projects

[42] Northern West Sussex Strategic Housing Market Assessment, paragraph 10.27 and Table 64, pages 128-129 (November 2019) Iceni Projects

[43] Northern West Sussex Strategic Housing Market Assessment, Table 69, page 158 (2019) Iceni Projects Limited

Table 9: Specialist Housing Need for Older Persons

2019 – 2039	Rented	Leasehold	Total
Housing with Support	-138	715	577
Housing with Care	175	276	451

3.5.5 Using the 2015 Index of Multiple Deprivation, the SHMA anticipated that 56% of specialist accommodation for older people is needed to be provided by the market sector, and the remaining 44% is needed in affordable tenures[44].

3.5.6 In addition, a need was identified for 1,029 care home bedspaces in Crawley to 2039, falling within C2 use class[45].

3.5.7 Furthermore, the SHMA also identifies a need for around 599 dwellings from wheelchair users in Crawley. This need equates to around 4% of the total housing need[46].

3.5.8 The SHMA looked at the principle of securing affordable housing/affordable care, considering the distinctions between Use Classes C2 (Residential Institutions) and C3 (Dwelling Houses). However, the SHMA concludes that the Use Class on its own need not be determinative on whether affordable housing provision could be applied. In particular, it is noted that the NPPF does not set out that certain types of specialist accommodation for older people are exempt from affordable housing contributions[47]. Therefore, the SHMA concludes that if policies in a new development plan are appropriately crafted, and supported by the necessary evidence on need and viability, affordable housing contributions could be sought from a C2 use[48].

3.5.9 It is considered that affordable housing is required across the full spectrum, and that C2 use cannot be restricted to those that can afford this use class, and affordable forms of care need to be factored into all developments of C2 use. In accordance with the advice in the SHMA, the Local Plan Viability Study considered the specific viability of extra care and C2 residential institutions.

3.6 Affordable Housing: Affordable Home Ownership

3.6.1 In Crawley, the SHMA estimated that 28% of all households fall within the rent/buy gap (i.e. they are able to rent a home without financial assistance but require support to access home ownership)[49]. This suggested a gross need for around 381 affordable home ownership homes (priced for households able to rent but not buy) per annum

[44] Northern West Sussex Strategic Housing Market Assessment, paragraphs 10.24 – 10.25, page 127 (November 2019) Iceni Projects
[45] Northern West Sussex Strategic Housing Market Assessment, paragraph 13.26, page 158 (2019) Iceni Projects Limited
[46] Northern West Sussex Strategic Housing Market Assessment, paragraph 13.27, page 159 (2019) Iceni Projects Limited
[47] Northern West Sussex Strategic Housing Market Assessment, paragraph 10.40, page 131 (November 2019) Iceni Projects
[48] Northern West Sussex Strategic Housing Market Assessment, paragraph 10.41, second bullet, page 132 (November 2019) Iceni Projects
[49] Northern West Sussex Strategic Housing Market Assessment, paragraph 7.39, page 84 (November 2019) Iceni Projects

in Crawley[50], of which 176 new supply of housing per annum is needed to meet the affordable home ownership need[51]. This is concluded to support the NPPF requirement for 10% of all new homes on larger sites to be for affordable home ownership.

3.6.2 Notwithstanding this, this is qualified by the clear and acute need within the borough for rented affordable homes for lower income households. In contrast, those with an affordable home ownership need in many cases have other housing options, such as an ability to rent housing in the market sector without financial support. On this basis, the requirement for affordable home ownership should not take precedence over higher priority affordable rented tenures.

3.6.3 The SHMA recommends Shared Ownership and Shared Equity as the most appropriate forms of affordable home ownership product, as well as providing other packages such as support for deposits. However, should Starter Homes and discounted market sales come forward then it is critical these are sold at a price that is genuinely affordable for the intended group[52]. The recommendation in the SHMA suggested affordable home ownership homes are priced to be affordable to households who cannot afford lower quartile house prices, and provides guidance of how homes of different sizes should be priced based on current evidence[53].

3.7 Affordable Housing: Affordable Private Rental

3.7.1 The SHMA identified, in the short-term, there is greater potential for Build-to-Rent development in Crawley, influenced by its demographic composition (with higher numbers of younger people) and a larger existing Private Rented Sector (in comparison with Horsham District)[54].

3.7.2 In order to ensure Build-to-Rent schemes in Crawley meet the needs of the borough, the Submission draft Local Plan aligns Policy H6: Build to Rent with the affordable housing policy by requiring discounted market rent made available for nominations from the council's housing register on the same basis as affordable rental, but on Assured Shorthold Tenancies.

3.8 Self and Custom Build

3.8.1 Crawley Borough Council is required under the Self-Build and Custom Housebuilding Act 2015 to maintain a Register of individuals and organisations who are seeking plots of serviced land for the building of their own self- and custom-built housing. The demand indicated by the Register has certain consequences for the council's activities as a Local Planning Authority. Firstly, the council is required to have regard to the demand indicated by the Register in performing its planning, housing, regeneration and land-disposal functions. Secondly, entries falling within Part 1 of

[50] Northern West Sussex Strategic Housing Market Assessment, paragraph 7.42, page 85 (November 2019) Iceni Projects
[51] Northern West Sussex Strategic Housing Market Assessment, paragraph 7.46, page 85 (November 2019) Iceni Projects
[52] Northern West Sussex Strategic Housing Market Assessment, paragraph 7.53, page 87 (November 2019) Iceni Projects
[53] Northern West Sussex Strategic Housing Market Assessment, Table 43, page 87 (November 2019) Iceni Projects
[54] Northern West Sussex Strategic Housing Market Assessment, paragraph 13.35, page 158 (2019) Iceni Projects Limited

the Register (i.e. those meeting any local connection / financial ability tests, where applicable) trigger a duty to grant suitable development permission in relation to a corresponding number of serviced plots of land, within three years following the conclusion of each annual 'base period' of the Register.

3.8.2 As of 31 March 2022, there were 104 individuals and one association on Part 1 of the council's Self-build and Custom Housebuilding Register, and 136 individuals and one association in total.

3.8.3 The majority of registered interest is focused on self-build units, with limited indicated demand for custom build. Detached houses represent the most recorded interest, with bungalows in demand. Plot sizes are typically varied.

3.8.4 The self-build legislation does not clearly define the 'suitable development permission' which may be counted as discharging the 'duty to grant planning permission' set out in the Act. For example, it states that permission is suitable where the development in question 'could include self-build and custom housebuilding', which seems to require only that it has the potential to include such housing. This complicates the exercise of assessing the council's performance against the duty. Nonetheless, given the constraints detailed in Topic Paper 4, it is considered that there is justification in taking a more positive approach in relation to such development through planning policy. This is the basis for proposed Policy H7. This sets out general requirements in respect of developments which comprise self- and custom-build housing, while also introducing a requirement for residential developments of 50 or more dwellings (with various exceptions and limitations) to provide 6% of the area occupied by residential plots in the form of serviced plots for self-build and custom housebuilding.

3.9 Gypsy, Traveller and Travelling Showpeople

3.9.1 The council's approach to calculating and meeting the accommodation needs of Gypsies and Travellers is set out in the revised Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2023[55]. This has concluded there continues to be no immediate need for new permanent plot or pitch sites within Crawley to meet the needs of the existing population. However, as with the previous 2014 Assessment, it is understood that there may be a need arising in the later years of the Plan period, which may equate to a need for up to 10 pitches. On this basis, the site at Broadfield Kennels remains a reserve Gypsy and Traveller site, developable from years 6 – 16 of the Local Plan Review.

3.10 Houses in Multiple Occupation

3.10.1 HMOs represent an important source of relatively affordable accommodation serving the needs of specific groups within the community, and supporting economic growth by allowing greater mobility within the labour force. This form of accommodation is particularly likely to be accessed by younger people up to age 35: a significant group within Crawley's population, among whom the rate of formation of new households is understood to be suppressed by the lack of housing affordability. 9.9% of households recorded in Crawley at the time of the 2011 Census included non-dependent children, and this is likely to have increased in the following years. HMOs

[55] draft Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2023) CBC

are considered to be particularly important for single people within this age group, who have been a significant source of approaches to the council's Housing Options service in recent years, and of whom over 150 are currently on the council's Housing Register[56].

3.10.2 As of March 2023, there are 248 licensed HMOs in Crawley[57], of which 90 are of three-storeys, with the rest being in almost all cases two-storey. 10 licenses allow for more than six occupants, thereby exceeding the threshold at which planning permission is required. The precise number of HMOs not needing a license is unknown. Estimates of the total number of HMOs in the borough, provided in returns to central government in recent years, have been at or above 500[58].

3.10.3 Where HMOs form clusters within a wider residential area this has the potential to cause negative impacts for existing residents because of cumulative impact. These typically relate to the issues controlled by the planning system, as distinct from those controlled by licensing, i.e. impact on the character of an area and the amenity of neighbouring properties, and greater pressure on space for parking and servicing. The terraces of three-storey townhouses where such clustering is occurring in Crawley are perhaps particularly susceptible to such impacts, as a result of the relative density of the built form. Therefore, in 2021, the council made Article 4 Directions in respect of ten small areas within the borough characterised by this form of housing, removing the permitted development right to convert dwellinghouses into C4 use (i.e. HMOs occupied by between three and six unrelated individuals).

3.10.4 Policy H9 in the draft Local Plan (the successor to Policy H6 in the adopted Plan) is supported by new criteria for consideration of cumulative impact and concentration, and proposes further supplementary guidance to aid consideration of planning applications where proposals for HMOs require permission.

4. Conclusions

4.1 Using the national Standard Method, Crawley has an overall objectively assessed housing need of **755dpa**. Over the Plan period, this equates to a total need of 12,080 net new dwellings.

4.2 Crawley has an overall affordable housing requirement of 739dpa, of which 563dpa are needed as rented affordable housing and 176dpa are needed as affordable home ownership properties. This is not an additional need as it arises from the same population within the overall housing need calculation. However, with a 40% affordable housing requirement from all new residential development, in order to meet the affordable housing need in full, a total of 1,848dpa would be required (and more because of the viability issues in the town centre).

4.2 The Submission draft Local Plan seeks to meet the specific housing needs of the borough as far as practical within a land constrained borough, taking viability into account. In particular, the borough is only able to meet 42% of its overall housing

[56] UK Census 2011; North West Sussex Strategic Housing Market Assessment 2019: Final Report, Iceni Projects, 2019, pp. 92-110; information from CBC Strategic Housing.
[57] Houses in multiple occupation | Crawley GOV
[58] Local Authority Housing Statistics, MHCLG.

needs, and less than 15% of its affordable housing needs (including because of the viability issues in the town centre reducing the amount of affordable housing achievable).

4.3 Therefore, it is essential that the Local Plan focuses on meeting those in the most need and seeks to maximise the housing provision secured within the borough for the evidenced needs of the borough's population. This includes securing affordable housing from small sites which will form an increasing proportion of the borough's housing supply.

4.4 As set out in Topic Paper 4, the council is seeking to maximise the supply of land within the borough for new housing opportunities, including increasing densities across the borough and particularly in locations where these are served by accessible public transport.

4.5 The Duty to Cooperate process has included discussions regarding the need for developments close to Crawley's boundaries to take into account the nature of the housing need in Crawley, including the need for affordable housing and for different types and sizes of housing, as set out in Topic Paper 1.

4.6 Crawley has no immediate need for new pitch sites for Gypsy and Travellers, nor any plot sites for Travelling Showpeople. However, a reserve site for up to 10 permanent residential pitches has been allocated through the Local Plans to meet any future need which may arise from the borough's existing Gypsy and Traveller community.

APPENDIX A: Small Residential Developments Completed (1 – 10 Gross Dwellings) between 2010/11 and 2022/23

Financial Year	Site Address	Net Dwellings Created
2010-11	Adj 33 Walnut Lane, Langley Green, Crawley	1
2010-11	7 Path Link, Northgate, Crawley	1
2010-11	4 Parkside, Northgate, Crawley	1
2010-11	N/E of Broadfield House, Peeks Brook Lane, Burstow	0
2010-11	Lake Cottage, 66 Grattons Drive, Pound Hill, Crawley	1
2010-11	Adj 2 Ivy Cottages, Church Road, Crawley	1
2010-11	22 Hawkesmoor Road, Bewbush, Crawley	1
2010-11	43 St Sampson Road, Broadfield, Crawley	1
2010-11	98 Three Bridges Road, Crawley	1
2010-11	Oaktree Cottage, Crow Corner & Caxtons, Church Road, Worth, Crawley	3
2010-11	St Wilfrids Catholic School Old Horsham Road, Southgate	5
2010-11	Oaktree Cottage, Crow Corner & Caxtons, Church Road, Worth, Crawley	7
2010-11	St Wilfrids Catholic School, Old Horsham Road, Southgate	8
2011-12	Adj 1 Winterfold, Furnace Green, Crawley	3
2011-12	Adj 38 Rillside, Furnace Green, Crawley	2
2011-12	Adj 10 Saunders Close, Pound Hill, Crawley	1
2011-12	Adj Rackham Close, Southgate, Crawley	7
2011-12	25 Perryfield Road, Crawley	5
2011-12	Adj 5 Leopold Road, West Green, Crawley	1
2012-13	Adj Koorah Church Road, Pound Hill, Crawley	1
2012-13	Adj 24 The Croft, Crawley	1
2012-13	2 Hollybush Road, Northgate, Crawley	3
2012-13	9 Caffins Close	2
2012-13	4 Church Road, Pound Hill, Crawley	1
2012-13	1 Bank Terrace, Brighton Road, Southgate, Crawley	2
2012-13	45 Broomdashers Road, Three Bridges, Crawley	1
2012-13	Adj 1 Rhodes Way, Tilgate, Crawley	1
2013-14	225 Rapidata House, Three Bridges Road, Crawley	1
2013-14	24 The Croft, Gossops Green	1
2013-14	45 Ifield Road, West Green	1
2013-14	Adj 56 Stafford Road, Langley Green, Crawley	1
2013-14	Land S/E of 46 Rushetts Road, Langley Green, Crawley	1
2013-14	126 London Road, Northgate, Crawley	1
2013-14	22 Martyrs Avenue, Langley Green, Crawley	2
2013-14	Adj Greyhound Cottage, Tinsley Green, Pound Hill	2

Financial Year	Site Address	Net Dwellings Created
2013-14	38 Hazelwick Road, Three Bridges, Crawley	4
2013-14	42A East Park, Southgate, Crawley	4
2013-14	Highfield House, Town Mead, West Green	4
2013-14	North Lodge, Gossops Green Lane, Gossops Green	4
2013-14	Site D, adj 6 Lewisham Close, Broadfield, Crawley	4
2013-14	Adj 7/9 Weirbrook, Furnace Green, Crawley	5
2013-14	Adj 7/9 Weirbrook, Furnace Green, Crawley	5
2013-14	8 Goffs Park Road, Southgate, Crawley	6
2013-14	Land Off Clitherow Gardens and Malthose Road, Southgate, Crawley	6
2013-14	St Andrews House, 26 Brighton Rd, Southgate, Crawley	6
2013-14	Denne Road	8
2014-15	10 East Park, Southgate, Crawley	1
2014-15	24 Lyndhurst Close	1
2014-15	6A The Broadway, Northgate, Crawley	1
2014-15	8A Brighton Road, Southgate, Crawley	1
2014-15	Adj 18 Cobbles Crescent Northgate Crawley	1
2014-15	Apple Tree Farm, 37 Langley Lane, Ifield, Crawley	1
2014-15	Birchfield House, Ifield Road, West Green, Crawley	1
2014-15	R/O 53 Horsham Road, Southgate, Crawley	1
2014-15	8 The Broadway, Northgate, Crawley	2
2014-15	First Floor, 18 - 20 Broad Walk, Northgate, Crawley	2
2014-15	Forders Cottages, Donkey Lane, Fernhill, Crawley	2
2014-15	36 Alpha Road, West Green, Crawley	1
2014-15	Wilbury, Church Street, West Green, Crawley	4
2014-15	Crossways, Balcombe Road, Crawley	6
2014-15	Langley Green Youth Centre, Lark Rise, Langley Green	9
2014-15	Scout Group and Guides Hall, Lark Rise, Langley Green	9
2014-15	19 - 21 Queensway	10
2015-16	Land at Church Road Nurseries, Church Road, Pound Hill	-1
2015-16	10 Goffs Park Road, Southgate, Crawley	-1
2015-16	50 Ifield Drive, Ifield, Crawley	1
2015-16	168 Three Bridges Road Three Bridges Crawley	0
2015-16	Land Adj to Woodend, Forge Wood, Pound Hill, Crawley	1
2015-16	43 Milton Mount Avenue, Pound Hill, Crawley	1
2015-16	34a Horsham Road West Green Crawley	1
2015-16	45 Ifield Road West Green Crawley	0
2015-16	6-9 Ifield Road West Green Crawley	1
2015-16	43A Mill Road, Three Bridges, Crawley, West Sussex	1
2015-16	Land Adj to 132 Three Bridges Road, Three Bridges	1

Financial Year	Site Address	Net Dwellings Created
2015-16	Adj to Greyhound Cottage, Tinsley Green, Pound Hill	0
2015-16	1st & 2nd Floors, 2 The Pavement, Northgate, Crawley	2
2015-16	12 Springfield Road, Southgate, RH11 8AD	5
2015-16	First & Second Floors, 28-32 The Boulevard, Northgate	6
2015-16	15 Orchid Court, Pelham Place, Broadfield, RH11 9GF	6
2015-16	Alpine Works, Oak Road, Southgate	6
2015-16	Ground Floor, Brambletye House, 29 Brighton Road, Southgate, Crawley	7
2015-16	Kingsland Court, Three Bridges Road, Three Bridges	10
2016-17	First Floor, 14 - 16 Broad Walk, Northgate, Crawley	2
2016-17	Adj 4-6 Springfield Road Southgate Crawley	3
2016-17	Land Adj to 18 & 22 Langley Lane, Ifield, Crawley	1
2016-17	Land Adj to 1 Moat Walk, Pound Hill, Crawley	1
2016-17	Rear of 52 Hazelwick Road, Three Bridges, Crawley	3
2016-17	Land to the Rear of 68 North Road, Three Bridges, Crawley	1
2016-17	Land Adj to 13 Squirrel Close, Langley Green, Crawley	1
2016-17	The Gatwick Grove, Poles Lane, Langley Green, Crawley	1
2016-17	Flat 7-9 Queensway, Northgate, Crawley	1
2016-17	Silchester Silchester Drive Horsham Road Crawley	1
2016-17	10 Goffs Park Road, Southgate, Crawley	10
2016-17	Flight House, Fernhill Road, Horley	6
2016-17	Barton House, Broadfield Barton, Broadfield, Crawley	10
2016-17	40 Queens Square, Northgate, Crawley	6
2016-17	6 Brighton Road, Southgate, Crawley	2
2016-17	22 Brighton Road (First and Second Floors) Southgate	-2
2016-17	150 Three Bridges Road, Three Bridges, Crawley	1
2016-17	Land at Harewood Close (Adj no. 6) Three Bridges, Crawley	1
2016-17	29-35 High Street Crawley (3rd flr)	1
2016-17	11-13 West Street Southgate Crawley	3
2016-17	22 Brighton Road Southgate Crawley	2
2017-18	Leaf Cottage, Forge Wood, Pound Hill, Crawley	1
2017-18	Linden Cottage, 25 Worth Park Avenue, Pound Hill	0
2017-18	22 The Boulevard, Northgate, Crawley	2
2017-18	The Mill House, Hyde Drive, Ifield, Crawley	2
2017-18	4 The Pavement, Northgate, Crawley	2
2017-18	54 Langley Drive, Langley Green, Crawley	1
2017-18	1st and 2nd Floors, 12 The Broadway, Northgate	2
2017-18	21-28 Broad Walk	3
2017-18	First Floor, Ifield House, Ifield Green, Ifield, Crawley	3
2017-18	24-26 The Boulevard Northgate Crawley	4

Financial Year	Site Address	Net Dwellings Created
2017-18	Land at Church Road Nurseries, Church Road, Pound Hill	5
2017-18	21 & 28 Broad Walk	7
2018-19	75 & 75A Malthouse Road, Southgate, Crawley	-1
2018-19	First Floor, 37 & 37A High Street, Northgate, Crawley	1
2018-19	9 -12 Excalibur Close, Ifield, Crawley	1
2018-19	Langley Grange, Langley Walk, Langley Green, Crawley	1
2018-19	Land R/O 138 London Road, Northgate, Crawley	1
2018-19	14 - 15 The Courtyard, East Park, Southgate, Crawley	1
2018-19	Southern Counties Garage, 27-45 Ifield Road West, West Green, Crawley	2
2018-19	Central House, 11 - 13 Brighton Road, Southgate, Crawley	2
2018-19	Land Adjacent to 2 Tushmore Avenue, Northgate, Crawley	2
2018-19	The Mill House, Hyde Drive, Ifield, Crawley	1
2018-19	95-97 Three Bridges Road, Three Bridges, Crawley	2
2018-19	7A Maidenbower Square, Maidenbower, Crawley	3
2018-19	First Floor, 42-46 The Broadway	4
2018-19	23 Barnfield Road, Northgate, Crawley	5
2018-19	Traders Market, High Street, Crawley	5
2018-19	Land Adjacent to Dobbins Place, Ifield, Crawley	6
2018-19	56 & 58 Horsham Road, Southgate, Crawley	7
2018-19	First & Second Floors, 34-38 The Broadway; Second Floor, 40 The Broadway; and First & Second Floors, 48 The Broadway, Northgate, Crawley	8
2019-20	First Floor, 12 Broadwalk, Northgate	3
2019-20	20 Springfield Road & 1A West Street, Southgate, Crawley	4
2019-20	22 Brighton Road (First and Second Floors), Southgate	1
2019-20	179 Ifield Road, West Green, Crawley	1
2019-20	257 - 259 Ifield Road, West Green, Crawley	-2
2019-20	10 Ifield Road, West Green, Crawley	1
2019-20	44 Albany Road, West Green, Crawley	-1
2019-20	49 Horsham Road, West Green, Crawley	-1
2020-21	Savers 5 - 6 Queens Square, Northgate, Crawley	4
2020-21	Stoner House, Kilnmead, Northgate, Crawley (ground floor infill extension)	9
2020-21	Gurjar Hindu Union Temple, Apple Tree Centre, Ifield, Crawley	1
2020-21	257 – 259 Ifield Road, West Green, Crawley	3
2020-21	9 Woolborough Road, Northgate, Crawley	9
2020-21	Woodend, Forge Wood, Crawley	1
2020-21	16 Springfield Road, Southgate, Crawley	1
2020-21	43 Mill Road, Three Bridges, Crawley	0

Financial Year	Site Address	Net Dwellings Created
2021-22	74 Grattons Drive, Pound Hill, Crawley	7
2021-22	Fircroft, Church Road, Pound Hill, Crawley	4
2021-22	9 & 11 Home Close, Pound Hill, Crawley	3
2021-22	11 - 13 Queensway, Northgate, Crawley	4
2021-22	27 Crabbet Road, Three Bridges, Crawley	2
2021-22	81 Shipley Road, Ifield, Crawley	2
2021-22	R / O 65 - 71 Poynings Road, Ifield, Crawley	2
2021-22	35 Walton Heath, Pound Hill, Crawley	1
2021-22	95-97 Three Bridges Road, Three Bridges, Crawley	1
2021-22	Badgers Bank, Old Brighton Road, Broadfield, Crawley	1
2021-22	Land Adjacent to 139 Warren Drive, Ifield, Crawley	1
2021-22	Land off Worth Way (South of Saxon Road), Pound Hill, Crawley	1
2021-22	The Old Cottage, Church Road, Pound Hill, Crawley	0
2021-22	46 The Birches, Three Bridges, Crawley	1
2021-22	31 Crabtree Road, West Green, Crawley	1
2022-23	1 - 2 The Courtyard, East Park, Southgate, Crawley	2
2022-23	151 London Road, Langley Green, Crawley	1
2022-23	43 Mill Road, Three Bridges, Crawley	1
2022-23	44 Albany Road, West Green, Crawley	3
2022-23	7 East Park, Southgate, Crawley	1
2022-23	9 - 11 East Park, Southgate, Crawley	4
2022-23	Fairhaven, Fernhill Road, Forge Wood, Horley	1
2022-23	First Floor, 174 Three Bridges Road, Three Bridges, Crawley	2
2022-23	Oakleigh, Church Road, Pound Hill, Crawley	1
2022-23	R/O 3 Southgate Road, Southgate, Crawley	1
2022-23	R/O 5-9 Southgate Road, Southgate, Crawley	3