CRAWLEY BOROUGH COUNCIL

AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

REGULATION 12 CONSULTATION STATEMENT

November 2017

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1. Introduction

1.1. This Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, and Crawley Borough Council's Statement of Community Involvement (SCI) (2017). It also has regard to the requirements of the National Planning Policy Framework (2012).

1.2. Regulation 12 of the Local Planning Regulations requires that before a local planning authority adopts a Supplementary Planning Document (SPD) it must prepare a statement identifying the persons who have been consulted in the preparation of the document, the main issues raised by them, and the manner in which these have been addressed. The present document is that statement. An earlier version was made available alongside the SPD for the purpose of seeking representations as part of a public consultation and has been updated accordingly.

1.3. The council's SCI requires that local planning documents be subject to a period of 'early engagement' prior to formal consultation, providing opportunities for interested stakeholders and individuals to feed into the preparation of the document. In setting out the details required by Regulation 12 as mentioned above, this document provides a summary of the 'early engagement' process and the formal consultation.

2. Involve: Stage 1 – Early Engagement

2.1. Early in October 2015, the council contacted all those parties who had previously asked to be kept informed about the progress of the Crawley Borough Local Plan[1], highlighting the fact that the council proposed to produce a group of SPDs across a range of identified topics, including affordable housing. Those contacted were invited to sign up for further updates in relation to particular topics, and directed to a page on the council's website providing further information about the function of the SPDs and their proposed scope. The web page also invited interested parties to respond to nine broad questions about their coverage and approach.

2.2. Alongside this engagement with contacts from the council's Local Plan database, invitation was sent to members of the council to express their interest in particular SPDs. The SPDs and the associated web page were also publicised via the council's main web page.

2.3. In response to these communications, a number of parties, including external stakeholders and council members, confirmed their desire to be kept up to date with progress with the SPDs, including the Affordable Housing SPD. No responses were received in relation to the Affordable Housing SPD regarding the nine broad questions mentioned above.

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[1] See Appendix A for details of the materials used as part of the general Early Engagement consultation.

2.4. On 20 January 2016, a seminar was held for all council members at which the proposed focus and approach of each SPD currently being worked on was summarised, and questions and comments were invited. Issues of particular interest to the Affordable Housing SPD focused on the need to promote the positive benefits of affordable housing, and why providing it as part of new development is a good thing. The current policy relating to no threshold for affordable housing requirements being triggered was clarified. These have been taken into account in preparing the SPD.

2.5. Concurrently with these engagement exercises, a number of internal and external stakeholders were invited to provide comment on individual SPDs where the council considered that their expertise would be particularly valuable in the early drafting work. Development Management raised a number of points, emphasising that guidance should be clear and usable to ensure that planning applications are supported by relevant information and that developers are aware of the policy expectations. Discussions have also considered the approaches available to address the disproportionate burdens for small housing developments and to provide simplified guidance for developers of small sites.

3. Consult: Stage 2 - Publication

3.1. A formal stage of public consultation was undertaken on a draft version of the Affordable Housing SPD. The draft document was available for representations over a six week period between 21 June 2017 and 2 August 2017. This consultation was undertaken in accordance with Regulation 12. (b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, and the council's Statement of Community Involvement.

3.2. The SPD is accompanied by a Summary Guidance Document for Small Residential Developments. This does not form part of the SPD, nor is it intended to have the same status in relation to the planning process. It is nonetheless intended to complement the SPD and provide helpful guidance to developers of small sites. On this basis, it was included within the consultation both in order to clarify the scope of the SPD on this issue and to enable representors to comment on it in its own right, or highlight areas the documents did not address.

3.3. All consultees included on the council's Local Plan consultee database were emailed or written to with notification of the commencement of the consultation. In addition to this, Registered Providers and Affordable Housing contacts were consulted separately, and the council's known contacts of small house builders and agents who practice in Crawley. A reminder email was circulated to targeted consultees highlighting the close of consultation date. The consultation materials are set out in Appendix B of this consultation statement.

3.4. During the consultation period, the draft Affordable Housing SPD was available to view online at www.crawley.gov.uk/crawley2030. Paper copies of the documents were available at the Town Hall and Crawley Library during normal office hours.

3.5. The consultation draft SPD included a number of specific questions to aid the consultation process. These were set out within the document, both throughout the text and together at the end of the document for reference. They are replicated in Appendix B(1) of this consultation statement. Responses did not have to be restricted to answering the questions and

comments were welcomed on any part or aspect of the draft SPD or Summary Guidance Document.

Representations Received

3.6. Representations had to be provided in writing. This could be done either by emailing the Forward Planning team or by post. Representations received during the consultation period are set out in tabular form in Appendix C. The council's response to the comments received are provided in the same table, this includes reference to where the representation received have led to changes in the final SPD.

3.7. Responses were received from statutory stakeholders[2], local residents and interested planning agents. Representations received considered matters including a concern that viability issues will reduce the number of affordable housing units secured, promotion of a particular rent to buy model of housing tenure.

3.8. A concern was also raised in relation to the application of the policy to extra care and other forms of care development. This has been carefully considered by the council. The approach in the SPD takes into account the concerns raised through the consultation and addresses them in accordance with the detailed responses set out in Appendix C to this document.

3.9. No representations were received raising concern in relation to the proposed financial contributions calculator nor the application of the policy below the national threshold of ten dwellings or less.

[2] Environment Agency, Natural England, Gatwick Airport Aerodrome Safeguarding, Southern Water, and Highways England.

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APPENDIX A: EARLY ENGAGEMENT MATERIALS

1. GENERAL CONSULTATION QUESTIONS

The following questions are being asked to feed into the early stages of scoping the SPDs:

Q1: Do the topics identified cover the main areas requiring additional guidance?

Q2: Are any of the topics considered unnecessary?

Q3: Are there any additional topics which haven't been identified as a Supplementary Planning Document which the council should consider?

Q4: Are the policies identified to be covered by the SPDs appropriate?

Q5: Should any of the policies be addressed in a different SPD to that identified in the table?

Q6: Should policies only be covered by one SPD rather than considered by each relevant topic area?

Q7: Are there other policies in the Crawley Borough Local Plan 2015 – 2030 (Crawley 2030) that haven't been identified which should be considered for inclusion in one of the SPDs?

Q8: Should the SPDs focus solely on statutory planning policy guidance or should they provide best practice examples and to provide advice and suggestions beyond the remit of planning policy, within the topic area?

Q9: Do you have any other, strategic comments on the scope and remit of the SPDs for consideration at this stage?

Further detailed questions will be asked relating to each of the topic areas in due course.

2. EARLY ENGAGEMENT EMAIL TO LOCAL PLAN CONSULTEE DATABASE

LOCAL PLAN UPDATE

2 October 2016

Dear ,

You have previously indicated an interest in being involved in the preparation of the Crawley Borough Local Plan 2015 – 2030: Crawley 2030. As you are aware the Local Plan is now in its advanced stages, having been considered through a series of Examination Hearing sessions held earlier this year. The council is now awaiting the Planning Inspector's final report.

This email seeks to draw your attention to the work the council are now commencing on to support the Local Plan once it is adopted as the borough's primary Planning Policy.

To aid the interpretation and implementation of some of the Policies within the Local Plan, a number of Supplementary Planning Documents (SPDs) are currently being considered for early preparation. These are proposed to cover the following topic areas:

- Affordable Housing
- Climate Change
- Design
- Green Infrastructure
- Planning Obligations
- Town Centre

A period of early engagement is currently being undertaken from October to December 2015, with a number of general questions being asked in relation to these documents which we welcome your views on. The council's webpage www.crawley.gov.uk/crawley2030SPD provides more information.

If you are interested in being kept informed in any of the above topics, please could you contact the Forward Planning team and indicate which of the SPDs you are interested in. You are welcome to be involved and informed about any number of these, from one to all. The contact database for each will be kept separately to the others and the Local Plan.

Kind Regards,

The Forward Planning Team

More information

For more information, please visit our website www.crawley.gov.uk/crawley2030 where you can find details of the Local Plan and preparation of the new Supplementary Planning Documents.

Contact us

If you would like to contact the Forward Planning Team, please email us at forward.plans@crawley.gov.uk or you can phone us on 01293 428624.

Subscribe / unsubscribe

You have received this message as you have expressed an interest in being kept up-to-date with progress on Crawley's Local Plan. If you would not like to receive these updates any more, please respond to this email and let us know. If you know anyone that would like to receive these updates please ask them to email us at forward.plans@crawley.gov.uk

3. EARLY ENGAGEMENT LETTER TO LOCAL PLAN CONSULTEE DATABASE

Strategic Housing & Planning Services

Contact: Elizabeth Brigden **Date: 09/10/2015**

Direct Line: 01293 438624 **Email: Forward.Plans@crawley.gov.uk**

Lee Harris
Chief Executive Directorate

Dear Sir or Madam,

You have previously indicated an interest in being involved in the preparation of the Crawley Borough Local Plan 2015 – 2030: Crawley 2030. As you are aware the Local Plan is now in its advanced stages, having been considered through a series of Examination Hearing sessions held earlier this year. The council is now awaiting the Planning Inspector's final report.

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If you are interested in being kept informed in any of the above topics, please could you contact the Forward Planning team by email at Forward.Plans@crawley.gov.uk or phone 01293 438624 and indicate which of the SPDs you are interested in. You are welcome to be involved and informed about any number of these, from one to all. The contact database for each will be kept separately to the others and the Local Plan.

Yours Faithfully,

Elizabeth Brigden
Planning Policy Manager

4. SPECIFIC AND GENERAL CONSULTEES

Addaction
Afro Caribbean Association (ACA)
Age Concern West Sussex
Ahmadiyya Muslim Association UK (Crawley Branch)
Alternative Learning Community Bewbush
AMEC Environment & Infrastructure
BAPS Swaminarayan Santha
Barton Willmore
Black History Foundation
Blue Cedar Homes Limited
BME Ladies Health and Social Wellbeing Association
Bodhisattva Buddhist Centre
British Horse Society
British Humanist Society
Broadfield Christian Fellowship
Broadfield Youth and Community Centre
Campaign for Real Ale
CBRichard Ellis
Celtic & Irish Cultural Society
Central Crawley Conservation Area Advisory Committee
Central Sussex College
Chagos Island Community Association (CICA)
Chagos Islands Refugees group
Chagossian Elderly West Sussex Group
Charlwood Parish Council
Churches Together in West Crawley
Colgate Parish Council
COPE
County Mall
Crawley Bangladeshi Welfare Association
Crawley Baptist Church
Crawley Campaign Against Racism
Crawley Clinical Commissioning Group
Crawley Community Relations Forum
Crawley Community Transport
Crawley Community Voluntary Service
Crawley Educational Institute
Crawley Ethnic Minority Partnership
Crawley Festival Committee
Crawley Homelessness Forum
Crawley Homes in Partnership (CHiP)
Crawley Interfaith Network
Crawley International Mela Association (CIMA)
Crawley Kashmiri Women's Welfare Association
Crawley Mosque
Crawley Museum Society
Crawley Older Person's Forum
Crawley Portuguese Association
Crawley Shop Mobility
Crawley Tennis Club
Crawley Town Access Group
Crawley Wellbeing Team
Crawley Young Persons Council
Cycling Touring Club
Darlton Warner Davis LLP
Deloitte LLP
Deloittes
Development Planning & Design Services Ltd
Diego Garcian Society
Divas Dance Club
DMH Stallard LLP
Drivers Jonas Deloitte
DTZ
East Sussex County Council
Eastern Stream
Elim Church Crawley
Equality & Human Rights Commision
Firstplan
Forestfield & Shrublands Cons. Area Adv Ctte
Freedom Leisure
Friends of Broadfield Park
Friends of Goffs Park
Friends, Families and Travellers
Fusion Experience
FusionOnline
Gambian Society
Gatwick Airport Limited
Gatwick Diamond
GL Hearn Ltd
Gleeson Strategic Land
Gurjar Hindu Union (GHU)
Health Through Sport Action
Heathrow Airport Holdings Limited
High Weald AONB Unit
Home Builders Federation Ltd
Housing & Planning Directorate
Housing 21
Hunter Page Planning Ltd
Hyde Housing Association
Iceni
Ifield Park Care Home
Ifield Village Conservation Area Advisory Committee
Ikra Women & Children Learning Centre
Inspire Broadfield (youth group)
Ismaili Council
Iyad Daoud
Jones Lang Lasalle
Kashmiri Educational and Welfare Trust
Kenneth Boyle Associates
Lewis & Co Planning South East Limited
Local Economy Action Group
Lower Beeding Parish Council
Maidenbower Baptist Church
Maidenbower Community Group
Malaika Sussex Multicultural Women's Group
Manor Royal Business Group
Michael Simkins LLP
Millat-e-Jafferiyah (Shia Muslim Mosque)
MITIE Property Services Limited
Moat Housing
Montagu Evans
Muslim Women's Forum
National Federation of Gypsy Liaison Groups
New Hope Church
Newdigate Parish Council
Northgate Matters
Oakton Developments
Outreach 3 Way
Parish of Worth, Pound Hill and Maidenbower
Parker Dann Limited
Pegasus Group
Pembrooke Residents Association
Persimmon Homes

Planware Ltd.
Play England
Premier Planning Plc
Rapleys LLP
RenewableUK
RISE
Royal Mail Properties
RPS Group
Rusper Parish Council
Savills
SEBA South East Bangladeshi Association
Seva Trust
Shelter Housing Aid Centre
Shire Consulting
Sikh Community Centre Crawley & CPT
SIVA
Slaugham Parish Council
Soka Gakkai International – UK
Southern Counties
Southgate Conservation Area Committee
Sport England
Spurgeons
Sri Guru Singh Sabha
Sri Lanka Think Tank UK
Sri Lankan Muslim Welfare Association
St Margaret's C of E Primary School
Stanhope PLC
Stiles Harold Williams Partnership LLP
Strutt and Parker
Sussex Action Traveller Group (STAG)
Sussex Traveller Action Group
Sussex Wildlife Trust
Sustrans
Swadhyay Community Project (SCP)
Talk Bewbush
Taylor Wimpey
Thakeham Homes Ltd
Thales UK
The Clearwater Gypsies
The Gypsy Council
The McLaren Clark Group
The Miller Group
The Palace Street Group
The SIVA Trust
The Theatres Trust
The Vine Christian Fellowship
Three Bridges Forum
Three Bridges Free Church
Tinsley Lane Residents Association
TRY (Plus Chair of Black History Foundation & other orgs)
United Reformed Church
Vision in Youth Collective
West and Partners
West Sussex Access Forum
West Sussex Children and Family Centres
West Sussex Crossroads
West Sussex Youth Support and Development Service
Woodland Trust
Worth Conservation Area Group
Worth Parish Council
WRVS
WS Planning & Architecture
WYG Group
Metrobus
Reside Developments Ltd.
Savills
Land Planning & Development
DevPlan
JWL Associates Limited
HCA
Deloitte
Arora International
Development Securities
Moat Telford Place
Crawley Clinical Comissioning Group
Adur & Worthing
Brighton & Hove City Council
British Telecom
BT Plc
Chichester District Council
Coast to Capital LEP
Epson & Ewell Borough Council
English Heritage
Environment Agency
Highways England
Homes and Communities Agency
Horsham District Council
Lewes District Council
Marine Management Organisation
Mid Sussex District Council
Mole Valley District Council
National Grid
Natural England
Network Rail
NHS Sussex
Reigate and Banstead Borough Council
South Downs National Park
Southern Gas Network
Southern Water
South East Water
Surrey County Council
Sussex Police
Tandridge District Council
Thames Water
The Coal Authority
UK Power Networks
Waverley District Council
West Sussex County Council
Worthing Borough Council
West Sussex County Council
West Sussex Fire and Rescue Service
Guildford District Council
National Landlords Association
Sport England
Travis Perkins
Deloitte
Dev Plan UK
DPDS Planning
Indigo Planning
AMEC Foster Wheeler
WYG Planning
WYG Planning
Holiday Extras
Sussex Wildlife Trust
Sussex Gardens Trust
Historic England
Quod Mayfield Market
Tetlow King
Gatwick Area Conservation Campaign
Stratus Environmental

Zoe Elphick
Miss Z Read
Yvonne Lindsay
Sean
Yvonne Shaw
Yeshwant Patel
Yasmin Church
Y Bosseva
Rosa Pereira
Miss R Nieman
Wendy Bell
Wendy Whittington
W Chorley
Stephen Hayes
Wendy Plaistow
Mr & Mrs Bennett
Z Wilson
Brian Wilkinson
Paul West
Michael-Thor Bateman
Wesley Brazier
Wes Botting
Mrs WJ Paton
W Lovell
Ann Pile
Vivienne Dawson
Vishal Mathur
Vikki-Jade Peters
Vidita Shah
Victoria Martin
Vicky Langham
Victoria Beach
Vicki Wallage
Vicki Mills
Vicky Nixon
Vicki Clare
Verity Eunson-Hickey
Paul Owen
Veronika Novotna
Verity Colbert
Katie Vella
Iryna Varvanina
Mr Vaidya
Mr R S Upton
Patricia Upham-Hill
Charles Jones
T Pawlak
M Wright
Miss Tracy Poynter
Tracey Gillett
Tracy Jones
Tracy Clarke
Tracey Wesson
Tracey Leicester
Tracey Coleman
Tony Sutton
Tony Fullwood
Toni Smith
Thomas James Whittington
Tom Familton
Thomas Carney
Tom Woolner
Natalie Tippett
Tina Wort
Tina Thrift
Tina Patel
Priscilla Lambert
Emma Thrift
Coral Thompson
Thomas Peckham
Tom Pashley
Morgan O'Flanagan
Clare Loader
M B Lanham
Mrs Jenny Lakeman
Roy Howard
Lynn Howard
Karen Tankard-Fuller
Timothy Caig
Amanda Whale
Kim Gordon
Mrs Teresa Perrott
Terry Beavis
Mr Terry Wheller
Jake Hawkins
Chay Sharp
David Sharp
Ellice Sharp
Patricia Sharp
Tom Doyle
Terry Stanley
Tracey Bennett
Tara Petty
Tanya Bunn
Tanya Sladovich
Tadeusz Jasko
T Pool
Tracey Cox
Sylvia Handy
Angela Heath
Mrs Siyar
Suzanne Davies
Mrs S Knight
Suzannah Guy
Susan Lester
Susan Smyth
Sue Carraher
Sue Arnold
Sunita Singal
Sumra Ahmed
Sumi Patel
Sue Mason
Miss Susan King
Sue Janota
Natacha Wilson
Karla Strudwick
Sarah Dowdall
Sandra Foxton
Stewart Neate
Stevin
Mr Steven Soper
Steve Taylor
Stephen Rivers
Stephanie Cox
Stella Daff
Dtella Makey
Staum Parrett
Charis Atkinson
Stacy Malin
Sharon Spice
Stacey Rose
Nina Spence
Sophie Davies
Sophie Airey
Sophie Harding
Colin Snook
Dawn O'Dwyer
Sophie Eaton
Sam Bouglas
Sharon Richardson
Sarah-Jane Willis
Siobhan Miller
Claire Collins
Doreen Simpson
Simon Thrift
Joan Thrift
Simon Freeman
Simon Douglas
Simon Randall
Simon Hickey
Simon Burrows
Simon Biffen
Sim Sidhu
S.Newbury
Sherwin Scott
Michelle Holmes
Darren Williams
Shelley Williams
Malcolm Woodhead
Sheila Woodhead
Shazia Ahmed
Shazia Sidat
Gwen Poyton
Sharon Ottley
Shayne Fensom
G V Sharp
Sharon Terry
Leandro Correa
Sharon Correa
Sharon Brumwell
Sharon Vygus
Mrs S Veaney
Sharon Harris
Ms L Flay
Mrs Harrington
Alison Shackell
S. Garvin
Serene Cottee
Mrs S E Cooke
Sean Reynolds
Steven Woods
Zoe Grimshaw
Amanda Bounds
Samuel Beach
Andy Marriott
Mrs Sarita Arya
Mrs. Renata Hegedusne
Sarik
Sarah Piper
Miss Sarah Carter
Sarah Newman
Sarah Lee-Fisher
Sarah Greenwood
Sarah Parker
Sara Ahmed
Sara Doyle
Martin Santaniello
Sandra Mehmet
Sam Judge
Sam Bateman
Samantha Haines

Sam Cook
Clare Salvage
Karen Salter
Sally Croft
Sally Thorn
Sally Osmond
Sally Sanders
Mrs Sabeen Mansoor
Sarah Keen
Mr Ryan Tate
Ryan Page
Ryan Jenkinson
Bob Woods
Russell Milton
Russell Sharp
Russ Mitchell
Rukiya Maxwell
Pamela Ruel
Reniece Robinson
Richard Page
Daniel Stannard
Josie Stannard
Libby Stannard
Roy Stannard
Kay Stannard
Ross Margetts
Rosie Cavedaschi
Ros February
Rosemary Cogdon
Rosemarie Jerome
Rosemary Benwell
Rory Church
Ronnie Armstrong
Rohan Patel
Rod Horton
Robert Rolfe
Robert MacPherson
Roberta Page
Robert Bruins
Robert Bird
Robin Vallins
Yvonne Vallins
Rob Pullinger
Thomas Pullinger
Vicky Pullinger
Robert Paliotta
Rik February
Richard Thorburn
Richard Symonds
Richard Nixon
Rhys Whittle
Rhonda Dann
Sophie Warren
Benson Kalubi
Rhoda James
Rachel Hillman
Reuben Peters
Aurora Lula
Remo Lula
Aaron Squirrell
Maretta Rees
Reece Church
Mr Reece Tate
Kelly Byworth
Stephen Leake
Rebecca Betteridge
Rebecca Holt

Mr Burgess
Mrs Burgess
Rudi Bird
Christopher Vincent Gartlan
Katerina Radova
Radhika
Rachel Price
Rachel Pamment
Georgina
Mr P Wakeham
Mrs I Wakeham
Lisa Wilson
Claire Burrage
Paul Thomas
Samantha Thomas
Sir / Madam
Jenny Willis
Paul White
Sir / Madam
Adelaide Jenkins
Kerry Dawson
Cristian Pierri
Karen Lewis
Tyler Pierri
Philippa Mitchell
Rex Upham-Hill
Petty West
Graham Petschel
Peter Willis
Peter Brooks
Peter Beckley
Pete Lyons
Peter Griffiths
George Penfold
Mr. & Mrs. G. Harwood
Jean Goodrich
Joanne Brown
Peter Burrows
Mary Burrows
Emily Johnson
Paul Oliver
Paul Brown
Pauline February
Paul Hughes
Paul Davis
Paul Berry
Paul Miller
Paula Hanslow
Paul Roberts
Paul Harrison
Patricia Patel
V Patel
Mrs P Godwin
Alexander Curtis
Pat Crees
Simon Pashley
Nick Pashley
Mr P Akhtar
Parmjit Sidhu
Peter Parker
Pam James
Sarah Page
Julie Daly
Patricia Burrett
Nick Price
Christopher Wilkinson
Mandy Wilkinson

Nick Wilkinson
Rachael Wilkinson
Shaun Wilkinson
Neena Seeruthun
Andrew Towner
Martin Bates
Mrs Kim Nobbs
Nadine Terry
Anita Bateman
Niraj Patel
Nick Cornwell
Nick Edwards
Nicole Sullivan
Niall Kelly
Niall Nugent
Johnny Da Silva
Netta Bond
Vanessa Marriott
Neil Slugocki
Neil Donald
Natalie Bingham
Julie Roberts
Neil Smith
Natalie Saunders-Neate
Mr Nathan Spriggs
Natalie Chambers
Natalie Zevka
Mrs Natalie Moran
Natalie Sullivan
Naomi Wiggins
Nancy Weltner
Najiya Slimani
M. Lashmar
Mr Michael Whiting
Maeve Weller
Laura Randall
Terry
Moustapha Kada
Mrs Janette Thompson
Linda Keynes
Wayne Bonner
Kara Bonner
Amanda Madel
Harry Madel
Trevor Madel
Samantha Wood
Mrs Sue Bristow
Margaret San Juan Martin
Shani Wheatley
Molly Rumble
Morag Warrack
Mohsin Ahmed
Mr M Richardson
Mr Martin Saunders
Jonathan Mitchell
Paul Lewis
Michael Petryszn
Mike Parker
Michael Eaton
Michael Simmonds
Mike Doyle
Maria Lula-Harris
Michael Schultz
Michelle Collins
Michele Singleton
Mike Jones
Pat Eldridge

Michelle Taylor
Melissa Gomes
Mel Ansell
Marion Auffret
Cheryl Higgins
Joanna Dyckes
W.M. Deacon
Michael Clive Latin
Deborah Burbidge
Mrs Maxine Soper
Maurice Frost
Nathan Frost
Maureen Foster
Matt Leese
Matthew King
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Stacey Barker
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Greg Upcott
Kinsley Upcott
Lola Upcott
Martine Channell
Martin Harbor
Mr A Marriott
Mrs K Marriott
Mark Hynes
Mark Lawford
Sir / Madam
Mark Brown
Mark Amos
Mr M Nieman
Mark Butcher
Marilyn Stockbridge
Mary Scott
Victoria Arnold
Sarah Seager
Mr Williams
Amanda Mustafaj
Mark McKown
Malcolm Woodhead
Malcolm Millard
Mala Patel
Maja Jasko
Margaret Florey
Mohammad Badshah
Lynsey Woods
Lynn Lowe
Mrs Lynda Morgan
Lee Warner
Luke Grima
Lucy Downie
Lucy Vella
Linda Taylor
Logan Peers
Lauren Parisi
Louise Waugh
Louise Weekes
Louise Brooks
Louise Golding
L Haynes
Lisa Burton
Charlotte Cox
Lauren O'Sullivan
Lorraine Pateman
Lorraine Graham
Susan Johnson
David Thrift
Lois Thrift
Sir / Madam
Mr Lee Whiting
Mr D Hill
Gordon Mitchell
Carina Higson
Jackie Littleton
Lisa Tomkinson
Lisa Powell
Kara-Leigh April Harrison
Lisa Curcher
Lisa Brown
Joan Hoys
Emma Challis
Ian Johnson
Shirley Bettinson
Lisa Bettinson
Linda Dabboussi
Mrs L Burchett-Vass
Master Liam Spriggs
Lewis Holman
Lesley King
Lesley Jacobs
Susan Bevis
Miles Carroll
Julia Hayes
Len Hayes
Lee Sellers
Lee Kabza
Rhys Carney
Jimi Carney
Lee Carney
Leanne Sim
Kyle Sim
Olivia Lindsey
Lewi Lindsey
Leeanne Jones
Mrs Stevens
Sir / Madam
Lauren Judge
Laura Virgo
Laura Fraser
Laura Irvine
Laura Marden
Laura Hamilton
Ms Charlotte Latimer
Pauline
Alena Hobson
Donna Botting
Jayden van de Lagemaat-Bettinson
Andre van de Lagemaat
P Wheeler
Kyle Fish
Jakub Jasko
Kate Towner
Karen & Phil Smith
Phil Smith
Kim Piercey
Peet Boxall
Kate Nulty
Joyce McGinty
Kevin McGinty
Karla Thompson
Kathryn Pashley
Krystal-Ann Peters
Harish Purshottam
Kirsty Piper
Kirsty Browning
Kim West
Kim Fairman
Kerry Hughes
Mrs Linda Kelly
Kevin Grimshaw
Kevin McGrath
Kerry Powell
Kerry Longmate
Kerry Pearson
Kerry Mudway
Kerry Allen
Lerrie Atkinson
Kenneth Webster
Pamela Webster
Kelly Channell
Kerry Mcbride
Karen Litten
K Christensen-Webb
Kim Elliott
Elizabeth Gardner
Kayleigh Nash
Kaye Handman
Kaya-May
Alfie Turner
Ben Turner
Charlie Turner
Katie Turner
Josh Turner
Katie Lampey
Katherine Randall
Katie Peers
Barbara Deakin
Karen
Karen Hackwell
Karen Pitt
Karen Eales
Karen Randall
Karen Lambert
Karen Burling
Karen Beckett
Kara Bonner
Lotti
Katharine Thompson
Kelly Virgo
Ashad Khan
Janet Gilroy
Julie Brennan
Julie Denman
Barbara Frost
Julia Frost
Julia Lee
Jigar Solanki
Shanaya Solanki
Nick Young
Jo Murray
Jacky Curtis
Josephine Anne Young
Josh Clarke

Josh Lambert
Josh Collins
Jose Manuel Pereira Sousa
Jocelyne Berreen
Jordan Fawcett
Josephine Evans
Peter Evans
Jo Bender
John Thompson-Balk
John Collisson
Sue Collisson
Nathan Johnston
John Mortimer
Pat Mortimer
John Connelly
John Tite
June Tite
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Joseph James
Joe Dines
Joe Comper
Joe Doyle
Jody Channell
Jodi Sanderson
Russell Dentith
Wesley Sanderson
Joanne Minihane
Sophie Coward
Billy Coward
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Mrs Jennifer Sweeney
Jennifer Hord
Jenny Lockyer
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Heather Bonner
Heather Peters
Linda Healy
Hayley Allen
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Sarah Hares
Daniel Patrick Cambel
Michaela Hanusová
Hannah Brown
Haley Kelly
Thomas Spindler
Helen Spindler
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Greig van Outen
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Graham Johnson
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Gemma Neathey
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Georgina Atkins
Gill Courtnell
Gillian Kellam
Mrs G Lawrence-Maxey
Ms E Lawrence-Maxey
Ms M Lawrence-Maxey
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Samantha Willmor
Fumiyo Tansley
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Fernando Engelbrecht
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Fatima Moseley
Falak Badshah
Fahmi Maxwell
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Ethan Peers
Eric Crawford
Emma Challis
Emma Maxwell
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Denis Andrew
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Gladys Betton
Leslie Betton
Debbie Betton
Clive Turner
Donna Pickin
Dr Richard Phillips
Ben Mark
Dave Kernohan
Patricia Kernohan
Sandra Kernohan
Declan McGinty
David L Andreson
Darren Saunders
Dionne Wilson
Diane Cooper
Ray Cooper
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Diana Brown
D Wilbourn
W. Witsen Elias
Debbie Staples
De Malone
Derek Wall
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Deion Newman
Debbie Guttridge
Debbie Street
Debbie Piller
Debbie Saunders
Mr Dean Whiting
Dean Hollamby
Darren Browning
Dawn Wilkinson
Brian Keegan
Eleanor Keegan
Dawn Keegan
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David Margetts
David Ashton
David Spindler
David Newcombe
David Covill
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Danielle Bunn
Dan Gardener
Daniel Furlong
Jennifer Cheeseman
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Donna Ray
David Cox
Mrs Carole Whiting
Chris Simmons
Colin Webster
Tina Webster
Thomas Barlow
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Graham Harding
Michael McKnight
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Sam Clark
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Kristen Bailey
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Gill Collins
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Dr Bill Temple-Pediani
Bryan Pashley
Brian Fagence-Traynor
Bruce Trewin
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Brian Dickinson
Brian Smith
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Brenda Burgess
Brenda Holman
Bradley Flory
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Mrs Beverley Bain
Janine Robins
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Samuel Webster
Ben Turner
Ben Golding
Ben Coleman
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William Dunning
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Becky Bates
Ellis Barton
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Peter Barton
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Barry Preston
Jennifer Preston
Barbara Alice Heather
Vivian
Barbara Pattison
Mrs B Coleman
Barbara Dunning
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Lin Ballard
David Baker
Suzanne
Steven Vine
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Alan Wells
Jean Austin
Anne Heuser
Audrey McLoughlin
Audrey Lindo
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Georgia Thomas
Jessica Thomas
Louis Thomas
Danny Swain
Olivia Meadows
Charlie Meadows
S Meadows
Finley Meadows
Anisah Sidat

Tony Sillince
Ann Richardson
Ann Harrington
Anne Tullett
Annette Gidman
Anne Greenbrook
Anne Fairbank
Aisha Sidat
Ania Jasko
Angie Gasson
Angie Crudgington
Angela Cohen
Angela Darbon
Angela Cole
Andy Tolfrey
Billy Tolfrey
Andrew Summers
Andrew Jagger
Jensen Jagger
Madelaine Jagger
Carlene Ahangama
Linda Ahangama
Mrs B Brown
Andrew Judge
Andrew Cusack
Andrew Chan
Lily Chan
Andrew Skudder
Mrs Andrea Richardson
Andrea Roberts
Ananda and Pieter
Ana
Ammaarah Sidat
Amy Young
Amanda Stannard
Mrs A Austin-Way
Amanda Roskilly
Amanda Jagger
Amanda Parker-Small
Joe Lavery
Edward Page
A Page
Miss Allanna Dwyer
Allan Lambert
Georgina Allan
Gina Allan
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Alicia Cusick
Alison Burke
Mrs Alison Hollman
Alfie Jones
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A and P Smith
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Kathleen Kenward
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Alison Heine
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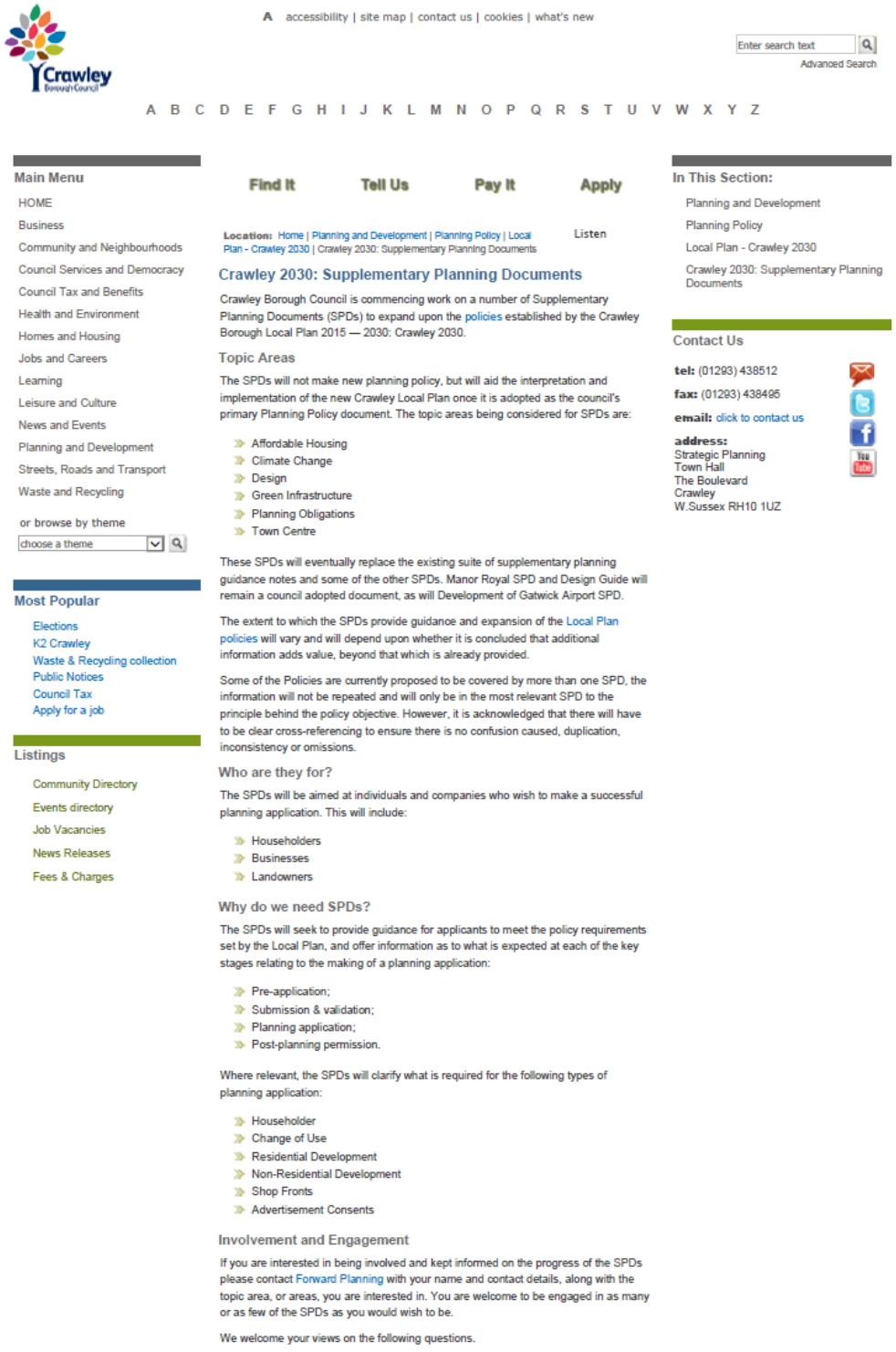
Alice Broomfield
Heidi Kelly
Andrew Metcalfe

5. CRAWLEY BOROUGH COUNCIL CRAWLEY 2030 SUPPLEMENTARY PLANNING DOCUMENT WEBPAGE



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Crawley 2030: Supplementary Planning Documents

Crawley Borough Council is commencing work on a number of Supplementary Planning Documents (SPDs) to expand upon the policies established by the Crawley Borough Local Plan 2015 — 2030: Crawley 2030.

Topic Areas

The SPDs will not make new planning policy, but will aid the interpretation and implementation of the new Crawley Local Plan once it is adopted as the council's primary Planning Policy document. The topic areas being considered for SPDs are:

- Affordable Housing
- Climate Change
- Design
- Green Infrastructure
- Planning Obligations
- Town Centre

These SPDs will eventually replace the existing suite of supplementary planning guidance notes and some of the other SPDs. Manor Royal SPD and Design Guide will remain a council adopted document, as will Development of Gatwick Airport SPD.

The extent to which the SPDs provide guidance and expansion of the Local Plan policies will vary and will depend upon whether it is concluded that additional information adds value, beyond that which is already provided.

Some of the Policies are currently proposed to be covered by more than one SPD, the information will not be repeated and will only be in the most relevant SPD to the principle behind the policy objective. However, it is acknowledged that there will have to be clear cross-referencing to ensure there is no confusion caused, duplication, inconsistency or omissions.

Who are they for?

The SPDs will be aimed at individuals and companies who wish to make a successful planning application. This will include:

- Householders
- Businesses
- Landowners

Why do we need SPDs?

The SPDs will seek to provide guidance for applicants to meet the policy requirements set by the Local Plan, and offer information as to what is expected at each of the key stages relating to the making of a planning application:

- Pre-application;
- Submission & validation;
- Planning application;
- Post-planning permission.

Where relevant, the SPDs will clarify what is required for the following types of planning application:

- Householder
- Change of Use
- Residential Development
- Non-Residential Development
- Shop Fronts
- Advertisement Consents

Involvement and Engagement

If you are interested in being involved and kept informed on the progress of the SPDs please contact Forward Planning with your name and contact details, along with the topic area, or areas, you are interested in. You are welcome to be engaged in as many or as few of the SPDs as you would wish to be.

We welcome your views on the following questions.

In This Section:

Planning and Development
Planning Policy
Local Plan - Crawley 2030
Crawley 2030: Supplementary Planning Documents

Contact Us

tel: (01293) 438512
fax: (01293) 438495
email: click to contact us
address:
Strategic Planning
Town Hall
The Boulevard
Crawley
W.Sussex RH10 1UZ

General Consultation Questions

Q1: Do the topics identified cover the main areas requiring additional guidance?

Q2: Are any of the topics considered unnecessary?

Q3: Are there any additional topics which haven't been identified as a Supplementary Planning Document which the council should consider?

Q4: Are the policies identified to be covered by the SPDs appropriate?

Q5: Should any of the policies be addressed in a different SPD to that identified in the table?

Q6: Should policies only be covered by one SPD rather than considered by each relevant topic area?

Q7: Are there other policies in the Crawley Borough Local Plan 2015 – 2030 (Crawley 2030) that haven't been identified which should be considered for inclusion in one of the SPDs?

Q8: Should the SPDs focus solely on statutory planning policy guidance or should they offer best practice examples and be used to provide advice and suggestions beyond the remit of planning policy, within the topic area?

Q9: Do you have any other, strategic comments on the scope and remit of the SPDs for consideration at this stage?

Further detailed questions will be asked relating to each of the topic areas in due course.

Next Steps

The Local Plan policies remain subject to modification depending on the outcome of the Planning Inspector's final report into the Crawley Borough Local Plan.

Consultation on the draft SPDs will take place following the receipt of this, and after the Local Plan has been formally adopted by the council by way of a resolution at its Full Council meeting. This is currently anticipated to allow for public consultation on the SPDs to be undertaken early in the New Year (2016).

Crawley Borough Council Town Hall The Boulevard Crawley West Sussex RH10 1UZ
tel: 01293 438000 fax: 01293 511803 email: comments@crawley.gov.uk

APPENDIX B: STATUTORY CONSULTATION MATERIALS

1. AFFORDABLE HOUSING SPD CONSULTATION QUESTIONS

Part 2: Procedures and Requirements

1. Do you agree with the council's interpretation of national policy and the recent changes?
2. Do you have any additional evidence the council should consider in relation to Crawley's housing need and/or justification for affordable housing from all sites?
3. Is there any further guidance or information the council could helpfully provide in relation to the Development Management and planning application processes?

Part 3: Delivering Affordable Housing

4. Does the approach to on-site provision and tenure split, as established in the adopted Local Plan Policy, create any consequential issues which could be addressed or clarified through this SPD?
5. Do you have any comments in relation to the design requirements?
6. Would any other advice be beneficial?

Part 4: Alternative Arrangements

7. Do you have any additional evidence the council should consider in relation to viability and deliverability of house building in Crawley on large and small sites?
8. Has the SPD provided sufficient information on the requirement of a viability assessment?
9. Has the council provided sufficient clarity on the alternative arrangements and when these may be appropriate?
10. Do you have any comments in relation to either of the Options suggested for calculating the commuted sum?
    a) Do you consider the council's preferred option (Option A: Square Metre Levy) to be the most appropriate, or do you think Option B (Proportion of Sales Values) is preferable and why?
    b) Do you consider a third option (Option C: Combination of A & B) to be appropriate? Do you have any other suggestions of a combined approach which could be justified?
    c) Do you think the levels suggested in Option A: £350 Square Metre Levy and/or in Option B: 30% Sales Value are equivalent to Free Serviced Land in Crawley, or do you consider different values would be more appropriate? Please provide any evidence to justify your position.
    d) Do you have any other suggestions of an alternative approach to calculating the financial contribution commuted sum in lieu of on-site affordable housing provision?
    e) Are there any further considerations the council should take into account in establishing the financial contribution requirement in conforming with the adopted Local Plan Policy?
11. Are you aware of any particular issues the council should consider in relation to disproportionate burdens on smaller housing developments within Crawley which the council could assist in overcoming? Are there any additional considerations the council should have in relation to applying the Affordable Housing policy requirement to developments of either:

- 1-5 dwellings; and/or
- 6-10 dwellings.

Part 5: Arrangements with Affordable Housing Providers

12. Can the SPD provide any further advice in relation to the approach to viewings and occupancy?

13. Does the information provided in this Chapter provide sufficient clarity and assistance in relation to arrangements with the Affordable Housing Providers?

14. Do you have any further suggestions to help applicants meet the requirements and expectations of the Local Plan and the council, as set out in this SPD?

General

15. Are there any other issues or areas of the Local Plan Policies relating to the provision of Affordable Housing that need further clarification?

16. Do you have any further suggestions to help applicants meet the requirements of Local Plan Policies covered in this SPD?

2. EMAIL NOTIFICATION OF COMMENCEMENT OF FORMAL PUBLIC CONSULTATION TO CONSULTEE DATABASE

This is a courtesy copy of an email bulletin sent by Anthony Masson.

This bulletin was sent to the following groups of people:

Subscribers of Planning News (2251 recipients)

You have been sent this message because you are subscribed to receive information about **Planning** from Crawley Borough Council

Crawley 2030

Local Plan Update - 21 June 2017

AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT: CONSULTATION

Following the adoption of the Crawley Borough Local Plan: Crawley 2030, on 16 December 2015, Crawley Borough Council is seeking your views on the following Supplementary Planning Document:

- Affordable Housing

This document has been prepared to support the interpretation of the policies relating to the affordable housing requirement from all new residential developments, set out within the Local Plan, and to provide additional advice and guidance in relation to ensuring planning applications are submitted in accordance with the requirements of the Local Plan. In addition, a Summary Guidance Document for Small Residential Developments has been prepared and published for comments. Alongside these documents, the Affordable Housing Calculator is available for use.

Both documents and the Calculator are available to view on the council's website: www.crawley.gov.uk/crawley2030spd and the documents are available in hard copy at the Town Hall and Crawley Library during normal office hours.

Consultation will take place between 21 June and 2 August 2017. All responses must be made in writing, by **5pm 2 August 2017**, and can be submitted either by email to forward.plans@crawley.gov.uk or by post to:

Forward Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ

Consultation questions are set out within the Affordable Housing planning document for your consideration and assistance. However, comments do not have to be restricted to responses to these questions.

If you have any questions relating to this public consultation, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or elizabeth.brigden@crawley.gov.uk

Kind Regards,

The Forward Planning Team

Contact:

email: Elizabeth.brigden@crawley.gov.uk

telephone: 01293 438624

web: www.crawley.gov.uk/planning

Questions? Contact Us

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3. LETTER NOTIFICATION OF COMMENCEMENT OF FORMAL PUBLIC CONSULTATION TO CONSULTEE DATABASE AND SMALLER HOUSE BUILDER CONTACTS

Strategic Housing & Planning Services

Contact: Elizabeth Brigden **Date: 21/06/2017**

Direct Line: 01293 438624 **Email: Forward.Plans@crawley.gov.uk**

Dear Sir or Madam,

SUPPLEMENTARY PLANNING DOCUMENT: CONSULTATION

Following the adoption of the Crawley Borough Local Plan: Crawley 2030, on 16 December 2015, Crawley Borough Council are seeking your views on the following Supplementary Planning Document:

- Affordable Housing.

This document has been prepared to support the interpretation of the policies relating to the affordable housing requirement from all new residential developments, set out within the Local Plan, and to provide additional advice and guidance in relation to ensuring planning applications are submitted in accordance with the requirements of the Local Plan.

In addition, a Summary Guidance Document for Small Residential Developments has been prepared and published for comments. Alongside these documents, the Affordable Housing Calculator is available for use.

Both documents, along with the Calculator, are available to view on the council's website: www.crawley.gov.uk/crawley2030spd and the documents are available in hard copy at the Town Hall and Crawley Library during normal office hours.

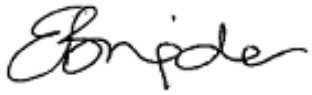
Consultation will take place between 21 June and 2 August 2017. All responses must be made in writing, by **5pm 2 August 2017**, and can be submitted either by email to forward.plans@crawley.gov.uk or by post to:

Forward Planning
Crawley Borough Council
Town Hall
The Boulevard
Crawley
RH10 1UZ

Consultation questions are set out within the Affordable Housing planning document for your consideration and assistance. However, comments do not have to be restricted to responses to these questions.

If you have any questions relating to this public consultation, or should you no longer wish to receive these updates, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or elizabeth.brigden@crawley.gov.uk

Yours Faithfully,



Elizabeth Brigden
Planning Policy Manager

Pegasus Group
Downsview Associates
Ian Garrett Building Design Ltd
ILS design
MAJ Architects
Blackstone Architects
RDJW Architects Limited
Denra Design Limited
dmsdesigns
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JNA Architects
Rookwood Homes Limited
DMA Building Designs
NJA Town Planning Ltd
GWP Architects
Mr Rich Little
WS Planning & Architecture
Hub Professional Services
Mr Luke Karmali
Mr Robert Ellis
MBV Design Associates Limited
Barclay Developments Ltd
KPS Contractors Ltd

4. EMAIL NOTIFICATION OF COMMENCEMENT OF FORMAL PUBLIC CONSULTATION TO AFFORDABLE HOUSING OFFICER CONTACTS AND REGISTERED PROVIDERS

Dear Sir/Madam,

I am writing to let you know that following the adoption of the Crawley Borough Local Plan: Crawley 2030, on 16 December 2015, Crawley Borough Council is seeking views on the following Supplementary Planning Document:

- Affordable Housing

This document has been prepared to support the interpretation of the policies relating to the affordable housing requirement from all new residential developments, set out within the Local Plan, and to provide additional advice and guidance in relation to ensuring planning applications are submitted in accordance with the requirements of the Local Plan. In addition, a Summary Guidance Document for Small Residential Developments has been prepared and published for comments. Alongside these documents, the Affordable Housing Calculator is available for use.

Both documents and the Calculator are available to view on the council's website: www.crawley.gov.uk/crawley2030spd and the documents are available in hard copy at the Town Hall and Crawley Library during normal office hours.

Consultation will take place between 21 June and 2 August 2017. All responses must be made in writing, by **5pm 2 August 2017**, and can be submitted either by email to forward.plans@crawley.gov.uk or by post to:

Forward Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ

Consultation questions are set out within the Affordable Housing planning document for your consideration and assistance. However, comments do not have to be restricted to responses to these questions.

If you have any questions relating to this public consultation, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or elizabeth.brigden@crawley.gov.uk

Kind Regards,

Anthony Masson, on behalf of the Forward Planning Team

Arun District Council
Adur & Worthing Councils
BPHA
Mid Sussex District Council
Horsham District Council
Chichester District Council
Moat Housing
Raven Housing Trust
The Guinness Partnership
Clarion Housing Group
Hyde Housing
Stonewater Homes
HCA

5. EMAIL REMINDER TO TARGETED CONSULTEES

LOCAL PLAN UPDATE

2 August 2017

Dear ,

AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT: CONSULTATION

You have previously been invited to comment on the draft Affordable Housing Supplementary Planning Document, which was subject to public consultation over a 6-week period between 21 June and 2 August. This formal period of **public consultation closes today at 5pm**.

This document has been prepared to support the interpretation of the policies relating to the affordable housing requirement from all new residential developments, set out within the Local Plan, and to provide additional advice and guidance in relation to ensuring planning applications are submitted in accordance with the requirements of the Local Plan. In addition, a Summary Guidance Document for Small Residential Developments has been prepared and published for comments. Alongside these documents, the Affordable Housing Calculator is available for use.

Both documents and Calculator are available to view on the council's website: www.crawley.gov.uk/crawley2030spd and the documents are available in hard copy to view at the Town Hall and Crawley Library during normal office hours.

Next Steps
The document will progress through to Crawley Borough Council's Cabinet meeting to be held on 4 October, in order to seek its adoption. To meet this deadline internal meetings will take place from 15 August.

If you want to get in touch with any final comments, particularly if you have any observations in relation to the approach being taken with small residential developments, please email forward.plans@crawley.gov.uk. If you have any questions relating to this Supplementary Planning Document, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or elizabeth.brigden@crawley.gov.uk. Comments received after the close of consultation, and prior to the formal reporting process up to adoption, will be taken into account as far as it is possible.

Kind Regards,

The Forward Planning Team

More information
For more information, please visit our website www.crawley.gov.uk/crawley2030spd.

Contact us
If you would like to contact the Forward Planning Team, please email us at forward.plans@crawley.gov.uk or you can phone us on 01293 428624.

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If you would not like to receive these updates, please respond to this email and let us know. If you know anyone that would like to receive these updates please ask them to email us at forward.plans@crawley.gov.uk

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GL Hearn Ltd
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GP Design
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Hyde Housing Association
Indigo Planning
JNA Architects
Jones Lang Lasalle
JWL Associates Limited
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Kenneth Boyle Associates
Land Planning & Development
Lewis & Co Planning South East Limited
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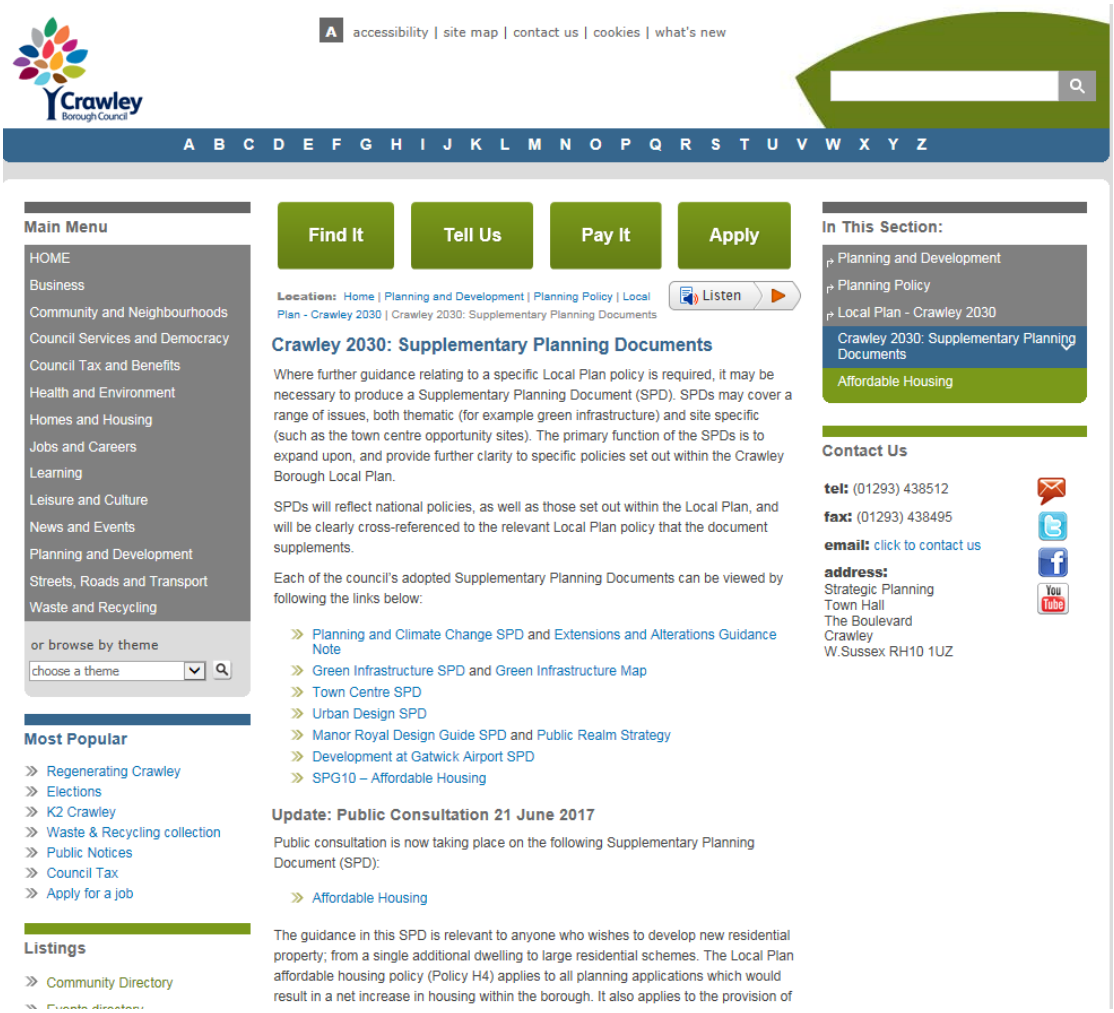
The Palace Street Group
The SIVA Trust
Travis Perkins
VW Planning
West and Partners
WPD Consultants
WS Planning & Architecture
WYG Group

6. CRAWLEY BOROUGH COUNCIL CRAWLEY 2030 SUPPLEMENTARY PLANNING DOCUMENT WEBPAGE



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Crawley 2030: Supplementary Planning Documents

Where further guidance relating to a specific Local Plan policy is required, it may be necessary to produce a Supplementary Planning Document (SPD). SPDs may cover a range of issues, both thematic (for example green infrastructure) and site specific (such as the town centre opportunity sites). The primary function of the SPDs is to expand upon, and provide further clarity to specific policies set out within the Crawley Borough Local Plan.

SPDs will reflect national policies, as well as those set out within the Local Plan, and will be clearly cross-referenced to the relevant Local Plan policy that the document supplements.

Each of the council's adopted Supplementary Planning Documents can be viewed by following the links below:

- Planning and Climate Change SPD and Extensions and Alterations Guidance Note
- Green Infrastructure SPD and Green Infrastructure Map
- Town Centre SPD
- Urban Design SPD
- Manor Royal Design Guide SPD and Public Realm Strategy
- Development at Gatwick Airport SPD
- SPG10 – Affordable Housing

Update: Public Consultation 21 June 2017

Public consultation is now taking place on the following Supplementary Planning Document (SPD):

- Affordable Housing

The guidance in this SPD is relevant to anyone who wishes to develop new residential property; from a single additional dwelling to large residential schemes. The Local Plan affordable housing policy (Policy H4) applies to all planning applications which would result in a net increase in housing within the borough. It also applies to the provision of

In This Section:

- Planning and Development
- Planning Policy
- Local Plan - Crawley 2030
- Crawley 2030: Supplementary Planning Documents
- Affordable Housing

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Update: Public Consultation 21 June 2017

Public consultation is now taking place on the following Supplementary Planning Document (SPD):

- Affordable Housing

The guidance in this SPD is relevant to anyone who wishes to develop new residential property; from a single additional dwelling to large residential schemes. The Local Plan affordable housing policy (Policy H4) applies to all planning applications which would result in a net increase in housing within the borough. It also applies to the provision of new residential care and nursing homes and care villages.

The Affordable Housing SPD includes information relating to the procedures and requirements for the provision of affordable housing as part of a planning application and provides guidance on alternative arrangements, including Viability Assessments and the calculation for financial contributions in lieu of on-site provision. A summary document containing guidance for small residential developments is available separately.

The documents are available to view using the links below and in hard copy at the Town Hall and the borough's libraries during normal office hours.

- Affordable Housing Supplementary Planning Document – consultation draft (June 2017)
- Affordable Housing Summary Guidance Document for Small Residential Developments – consultation draft (June 2017)
- Affordable Housing Calculator
- Draft Consultation Statement – Affordable Housing Supplementary Planning Document (June 2017)

Consultation will take place for six weeks between 21 June and 2 August 2017. All responses must be made in writing, by **5pm 2 August 2017**, and can be submitted either by email to or by post to:

Forward Planning

Crawley Borough Council

Town Hall

The Boulevard

Crawley

RH10 1UZ

Consultation questions are set out within the Document for your consideration and assistance. However, comments do not have to be restricted to responses to these. If you have any questions relating to this public consultation, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or via e-mail .

Adopted Supplementary Planning Documents: October 2016

Four SPDs were adopted by Crawley Borough Council in October 2016, following their

APPENDIX C: CONSULTATION REPRESENTATIONS RECEIVED AND COUNCIL RESPONSES

AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT		
Respondent	**Para/ Page no.**	**Comments**
Environment Agency		Thank you for consulting us on the above SPD. We have no concerns or comments to make on the document.
Council's Response: Response Noted.		
Natural England		Thank you for your consultation on the above dated and received by Natural England on 21st June 2017. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. **Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.** Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. **Strategic Environmental Assessment/Habitats Regulations Assessment** A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

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Respondent	**Para/ Page no.**	**Comments**
Council's Response: Response Noted.		
Gatwick Airport Aerodrome Safeguarding		Thank you for your email dated 21 June 2017, regarding the above mentioned document. The only comment we would make is that all development must be in line with aerodrome safeguarding requirements. We have no comments to make with regard to Affordable Housing Policy itself. If you have any queries please do not hesitate to contact me.
Council's Response: Response Noted.		
Stephen G. Coppen		However many 'affordable homes' are agreed to, it's a dead certainty that the developers will get the numbers reduced citing 'viability issues' as the reason they are unable to deliver. Even if that didn't happen (but we know it will), the paltry few that are finally available won't even put a dent in the numbers of poor overcrowded and homeless unfortunates (how many thousands, now ?) languishing year after year after year on the housing register list. Crawley Council needs desperately to grab the bull by the horns and work together with Horsham to bring forward the land West of Ifield where the Homes and Communities Agency holds 320 acres of land, most of which they want to see developed ASAP to help solve the appalling housing crisis being experienced by young people and families.
Council's Response: Comments noted. Viability is a legitimate planning reason for negotiation to take place from applicants on proposed affordable housing levels. This is clear in the NPPF and established in the Crawley Borough Local Plan Policy H4.		

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Due to the front-loading of housing delivery anticipated to come forward within Crawley borough, along with the construction of Kilnwood Vale neighbourhood contributing 150 dwellings per year from within Horsham district (in accordance with the Horsham District Planning Framework), the borough's objectively assessed housing need is being met by planned developments in and close to the borough's boundaries until at least 2025/2026. Beyond this, Crawley Borough Council is working closely with both of its neighbouring Sussex authorities (Horsham and Mid Sussex District Councils) who together with Crawley form the Northern West Sussex Housing Market Area in exploring opportunities for meeting the overall Housing Market Area's housing need in sustainable locations.		
Tetlow King Planning		We represent Rentplus, a company providing an innovative affordable housing model that delivers affordably rented homes to buy (a 'rent to buy' model) for people who aspire to own their own home, but are currently unable to save for a mortgage deposit. Enclosed with this consultation response is an Affordable Housing Statement by Tetlow King Planning setting out the model's compliance with the NPPF definition of affordable housing and how this should be incorporated into local plans to boost supply and meet local needs. We ask that this be read alongside our representation so that the Council's approach to negotiating affordable housing takes into account this innovative model which has the capacity to improve delivery and to meet high levels of local housing need and aspirations of home ownership. Rentplus delivers rent to buy housing that meets local peoples' needs and aspirations across England, in partnership with local planning authorities and Registered Providers. Those developments provide homes at an affordable rent for those expecting to purchase in 5, 10, 15 or 20 years. Analysis of recently completed developments has shown that around 30% of those moving into new Rentplus schemes left existing social and affordable rented properties, releasing those homes for families in greater need. Local people in those areas have also been able to leave private rented accommodation and parent's homes, gaining independence and security of tenure in high quality new housing. This allows people to overcome the mortgage deposit 'gap' by saving towards this while renting an affordable rent at 80% of open market rent (including any service charge) or Local Housing Allowance (whichever is the lower). The model would deliver clear benefits to households in Crawley who are unable to afford to buy and cannot currently save towards a future purchase. The SPD recognises the need for such tenure in the finding of an acute level of relative unaffordability for entry-level market housing as a result of *"continued difficulties for many households to secure housing finance and increased deposit borrowing requirements"* (**paragraph 2.16**). Households are encouraged to save for the duration of the tenancy period, and are gifted a 10% deposit by Rentplus at the time of purchase to

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		assist with mortgage finance. The nature of the product means that households currently in social rented or affordable rented properties, or on the Housing Register seeking such housing, may be more appropriately accommodated in a rent to buy home, freeing up those homes for those in greater housing need.
		Changes to National Affordable Housing Planning Policy We welcome the introduction of this SPD following the publication of the various Government consultations on proposed changes to national planning policy. As recognised in this section of the SPD, the aim of these proposals has been to maximise the delivery of affordable housing across the country and to widen the opportunities of all to access housing that meets their needs - including aspirations for home ownership. Rent to buy was specifically raised in the 2015 consultation on proposed changes to national policy, and again in this year's housing White Paper, *Fixing our Broken Housing Market* which stated: *"This includes Rent to Buy homes alongside shared ownership, which will enable thousands of households to access home ownership through a product that fits their circumstances. Rent to Buy will help hard-working households to benefit from a discounted rent set flexibly at levels to make it locally affordable so they can save for a deposit to purchase their home."* (Paragraph 4.28) We note that the Council will *"consider schemes which conform to the definitions within the latest formally published NPPF definition, within the adopted tenure split"* (paragraph 2.24). It is important however to ensure the Council keeps pace with the emerging policy position, supporting schemes that seek to help local people into housing that meets both their needs and their aspirations of home ownership. As Crawley has a clear need for housing that enables households to save towards a deposit, the SPD should explicitly support models, including rent to buy, that will meet those needs. Our comments above apply in relation to **Question 1**; we ask that the Council consider setting out more clearly its support for a wide range of affordable housing tenures that respond to local housing needs by explicitly allowing for rent to buy.
		In response to **Question 3**, we suggest that the Council acknowledge that Registered Providers, including those not 'known' to the Council, can provide affordable housing in Crawley. Rentplus works directly with locally active affordable housing providers to deliver and manage rent to buy housing in individual local authority areas, ensuring that housing is actively managed by RPs with a wealth of experience and knowledge of that area. This is also done in partnership with the local planning authority; as set out in the attached Affordable Housing Statement, Rentplus invites the LPA to enter into a Memorandum of Understanding which sets out each party's clear

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		commitment to working together to deliver more affordable housing for local people. Where a developer brings forward proposals that include affordable housing we suggest that the Borough Council encourage applicants to engage with a wide range of affordable housing providers.
		Tenure Split Following our earlier comments, we strongly suggest that this section also include rent to buy, most helpfully under Rental Tenures (**paragraph 3.10**). We recommend the following text: d) Rent to Buy is housing that is made available at a rent level which is at least 20% per cent below local market rent (including service charges where applicable) and later made available to the tenant living in the property to buy at a cost which may be less than market value. This meets the needs of house buyers who cannot initially afford a mortgage deposit but who will be able to save while renting affordably; the council supports this to address local affordability issues. We do not recommend placing rent to buy under Intermediate Tenures (**paragraph 3.11**) as the product is not a shared ownership or shared equity product, and unlike low cost market housing households are able to save towards full purchase of their home (with a gifted deposit) while renting the same home. The latest English Housing Survey (2017) found that 1.5 million households across England cannot afford to rent or buy, and the majority of these are under 35 and working full time. The rent to buy model reduces the need for multiple house moves, from rental accommodation to home purchase, as well as bridging the mortgage deposit gap that puts so many households off saving. In response to **Question 6**, we ask that the Council make the above amendments to the SPD, supporting the delivery of a wider range of affordable housing models to specifically target local housing needs and to address the considerable affordability gap in Crawley.
		Alternative Arrangements As set out in the accompanying Statement, the delivery of rent to buy housing as part of mixed tenure schemes can improve the viability of developments that may otherwise struggle to deliver affordable housing, and can deliver a more diverse tenure mix. In line with adopted Policy H4 this section of the SPD expects 40% affordable housing and 10% low cost market housing, but it should also recommend that a diversity of tenure will be supported where this will improve the overall supply of affordable housing.

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		We would like to be consulted on further stages of the plan and other relevant publications by the Council, by email only to consultation@tetlow-king.co.uk. Should it be useful, a meeting between relevant officers and Rentplus could be arranged to discuss these matters further. Please ensure that **Rentplus** is retained on the consultation database, with **Tetlow King Planning** listed as their agents.
		Attached document: "Rentplus: An Affordable Model; Affordable Housing Statement" Tetlow King Planning (January 2016) – see separately.

Council's Response:

- 'Rent-to-buy' is not considered to be a tenure, but rather a 'model' which ultimately delivers an ownership product. It would not be appropriate to explicitly mention 'rent-to-buy' in the SPD as it is one of many 'models' available in the market.
- Accordingly, it would not be appropriate to include rent-to-buy as an option in "Tenure Split". Fundamentally, the most desirable Rental Tenure is that of Social Rent set at target rent levels, followed by Affordable Rent at 80% of market (incl. of service charges) where in both cases qualifying tenants "who aspire to own their own home" have to option to exercise their Right-to-Buy (RTB) which offers a far greater 'discount' than that which may be offered by a 'rent-to-buy' provider.
- In addition, Discounted Market Rent is acceptable at council's discretion on a site-by-site basis as it addresses a very particular need within a PRS setting, and which will revert to social or affordable rent in the future. It is considered that 'rent-to-buy' also addresses a very limited need, and could be considered on a site-by-site basis against evidenced need.
- In the case of Social or Affordable Rent, where RTB is exercised, there is a capital sum that is safeguarded 'in perpetuity' for the provision of new affordable housing, and stair-casing from Shared-Ownership or Shared-Equity also brings about the perpetuity of recycled grant. This is not the case with 'rent-to-buy', where firstly there is an expectation (not an option) to purchase the property and there is no mechanism to retain any capital gains in perpetuity for the further provision of affordable housing. In addition, similar to Low-Cost-Market-Housing or Starter Homes any 'discount' that may or may not be offered is a windfall to the purchaser, making it very similar to this Low-Cost category of quasi-affordable housing as addressed in the SPD.
- As TKP suggests, 'rent-to-buy' would assist scheme viability. The SPD acknowledges that higher levels of subsidy (or cross-subsidy) is required to deliver social rent, and then affordable rent, and that the SPD allows for "viability enhancements" when faced with viability constraints. It would therefore be logical to introduce 'rent-to-buy' as a potential option to improve scheme viability as one of the "viability enhancements" in council's armoury, when required.

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• The council does not support TPK's suggestion it should accept affordable housing providers "not known" to Crawley, and who have no knowledge of the local housing market and no proven affiliation to addressing local housing needs or any knowledge of local policy. The council needs to protect relations with established RP's within this region in order to develop working partnerships and attract their investment capital. In addition, particularly when rental accommodation is involved, it is imperative that RP's have a local management presence. • RP's who are locally active in the area can offer a rent-to-buy 'model' directly, and in so doing offer a more diverse tenure mix, and possibly at more affordable levels with greater prospects of any capital gains being reinvested in the local area. • The SPD is explicit in its endeavours to meet local housing needs, and acknowledges the challenges of raising the necessary deposit and addressing the affordability gap, as is suggested by TKP, which the council believes is addressed through the recognised affordable housing tenures along with the affordable models that are available in the market, which includes Help-to-Buy, Build-to-Rent, Rent-to-Buy, LCHO, Starter Homes, etc., which is broadly allowed for to address any specific need, but the greatest need is for rental accommodation for those on the Housing Register who are in reasonable preference. • 'Rent-to-buy' can be considered as one of many available models, and there is nothing in the SPD that would restrict it from being considered as an affordable housing product on a limited scale in the cascade of viability options available to the council.		
Southern Water		Thank you for consulting Southern Water on the above named document. I confirm we have no comments to make in this instance.
Council's Response: Response Noted.		
Highways England		**Highways England reference:** 3061 **Consultation:** Crawley Borough Council - Neighbourhood Plan Affordable Housing Supplementary Planning Document and Summary Guidance Document for Small Residential Developments Thank you for inviting Highways England to comment on the Crawley Borough Council Neighbourhood Plan Affordable Housing Supplementary Planning Document and Summary Guidance Document for Small Residential Developments Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the

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		strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policy documents that have the potential to impact the safe and efficient operation of the strategic road network. Having reviewed the published documentation, we do not have any comments on the Crawley Borough Council Neighbourhood Plan Affordable Housing Supplementary Planning Document and Summary Guidance Document for Small Residential Developments however, please continue to consult us.
Council's Response: Response Noted.		
Tetlow King Planning: Richmond Care Villages Holdings Limited	Para. 2.9	Can you please take these comments into account in the process of seeking to form and ultimately adopt the Supplementary Planning Document (SPD) on Affordable Housing? In due course please explain the manner in which these comments have been addressed as per Regulation 12 of the Local Planning Regulations. **Introduction** These comments are made on behalf of my clients Richmond Care Villages Holdings Limited. They have a land interest in Crawley. My client wishes to object to this draft SPD in relation to how it interprets policy H4 of the development plan i.e. the Crawley Borough Local Plan 2015 – 2030 adopted in December 2015 where it relates to the application of this policy to C2 extra care and other forms of care development. This objection relates to paragraph 2.9 (as well as other relevant sections) where it says the following: "*2.9 Individual, self-contained units, even where these accommodate occupants receiving care and/or are restricted to occupancy over a particular age and/or are located within a complex which includes some C2 (nursing home) rooms, will still need to meet the requirements of affordable housing. Provision for affordable housing will therefore be expected from Sheltered and extra-care schemes (Use Class C3), and residential institutions housing people in need of care and nursing homes (Use Class C2) where they include self-contained units".*

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		The reasoning (where it exists) is so flawed and the justification so weak that it is hard to believe that anyone could find this meaning in the wording of H4, its accompanying text or the evidence that was produced to form that policy as interpreted within this SPD. It is worth pointing out that the text on the website from the consultation page says the following. *"The guidance in this SPD is relevant to anyone who wishes to develop new residential property; from a single additional dwelling to large residential schemes. The Local Plan affordable housing policy (Policy H4) applies to all planning applications which would result in a net increase in housing within the borough. It also applies to the provision of new residential care and nursing homes and care villages".* This wording is flawed and misleading because the actual document (as reproduced above) says that H4 applies to *"..residential care and nursing homes.."* whereas the actual document says that it only applies when those types of homes or care uses which have self contained units. This is an indication of the confusing nature of the Council's interpretation of policy H4 as expressed in the SPD. We have enclosed a legal opinion from Jeremy Cahill QC a leading planning advocate from July 2016. This opinion has been with the Council for a long period of time now and was formed when my clients were engaged in a pre application process. It was then submitted with the planning application CR/2016/0972/FUL. It has never been answered or responded to by the Council. This opinion answers the specific question of whether policy H4 applies to the development of care home beds and/or extra care dwellings falling in the C2 use class. The findings are so fundamental and in my view unarguable that I am astonished that the SPD takes no notice of this document, which they have had for many months, and yet perpetuate the continued clearly incorrect view on the application of H4 to "..*care and nursing homes (Use Class C2) where they include self-contained units".* It is unusual, verging on the incredulous, having had access to that opinion that the SPD does not even attempt to explain or respond to the fundamental flaws in the argument which this opinion exposes.
		Preliminary Matters The consultation includes a range of questions. Given our that objection relates to the application of policy H4 to C2 Extra Care and care developments in general many of these questions do not apply and are not relevant. It is of note that none of the questions ask if the Council's interpretation of H4 is considered to be correct. It is unusual for an SPD

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		not to ask the fundamental question – Is the interpretation of policy H4 contained in this document correct? Without such a question I believe general non-professional readers will not even be aware that this is an issue they can comment on and should consider. In my view it makes the consultation flawed Because of the comments we are making below we can say that we are answering question 15 relating to other issues or areas of the Local Plan Policies relating to the provision of Affordable Housing that need further clarification. The document correctly says at 1.1 that an SPD *"...does not set new planning policy".* It could go on and say, which it does not, that this document will not be part of the statutory development plan although like many other matters and issues it can be a material consideration. The NPPF explains that *"Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan".* I would suggest that the words *"are capable"* of course also mean that they are also *"not capable"* of being a material consideration for a variety of reasons which would include being flawed in their reasoning and preparation. There is no independent examination of this document and if in due course it is approved it remains purely the views Council and nothing more. How representations have been taken into account and answered will inevitably contribute to the validity and weight of the document when it is being considered by decision makers. The point being made here is that simply because the Council adopt a SPD does not mean that they become development plan policy or that another party's opinions or views can be overruled when those views and opinions are correct. This is particularly the case when they are obviously justifiable with reference to national policy, case law and any rational consideration of the development plan. Having explained that the SPD cannot set new planning policy we should be clear what this means. The SPD cannot extend policy H4 into types of developments or areas that a rational, objective and informed reader would reach yet that is precisely what the Council is in my view doing. It is seeking to correct a failing in the formation and wording of policy H4 and seeking to apply a provably perverse meaning to the policy that simply does not exist beyond an objective reading of policy H4.
		The SPD and Care Development The entire justification and explanation of applying policy H4 is contained within paragraph 2.9. Nothing else in the whole of the SPD addresses the issue being raised here i.e. applying policy H4 to C2 care development.

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		That wording explains self contained units (with no definition of what this actually means) will need to meet the requirements of affordable housing even if occupants are receiving care and are restricted by age. This also applies when the wider complex contains classic nursing home rooms in the C2 use class. The wording then goes on and explains that sheltered and extra care in the C3 class will be required to provide affordable under policy H4. I have no argument with that point and agree but also hope the Council understand that extra care can be C2 or C3 and the term "extra care" is not definitive of use class. 2.9 then goes on and says that in additional to C3 sheltered and extra care the policy also applies to care and nursing homes where they include "self-contained units" and again with no explanation or definition of what that term means. So from this it appears the Council view (we have had confirmation this is the case related to our planning application) is that the classic care home beds, whether these be residential or nursing, do not come under the policy but that units which come under the undefined term "self-contained units" do come under policy H4. While we disagree with this view we would ask that, on a without prejudice basis, the Council should at the very least properly explain and consult on what they mean by "self-contained units". The care industry is dynamic and fast moving reacting to high levels of older people with increased levels of dependency. Various models of accommodation and care are emerging on a regular basis. Huge efforts are being made in design and layout to ensure that even high dependency care homes are more homely and less institutional. It is not unusual to see modern high dependency care homes have small number of flatlet type units or suites (contained with the registered premises) with a small kitchen and living room and then a separate bedroom and washing facilities. They exist for many reasons which can include people who maybe passing away with space for a relative to stay, a person on the road to recovery to learn independent living, assessment of independence abilities, a response to a medical condition like depression and space for a relative to help in care. Do these units come under the term *"self-contained units"*?
		Policy H4 and C2 Development We have reproduced in full the text of policy H4 as an enclosure and also the reasoned justification (often called the accompanying text). There is no mention of C2 uses in the policy wording or the accompanying text. Such text in any event does not have the status of the policy wording itself. Please refer to the legal opinion on the status of accompanying text but in any event the text contains nothing on C2 extra care uses.

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		It must be an agreed point that there is no justification or explanation in the development plan of how the statutory wording includes C2 development. Because of this we have no justification or explanation to argue with and dispute on how this policy is being expanded beyond its meaning, contrary to case law and national policy, because there is no mention of C2 development that can be argued with or disputed. The only explanation from our previous correspondence and interactions with the Council is that three words of the statutory policy mean that this proposal is covers C2 development. These three words are "all residential developments". The Council's interpretation of those words is the only justification that any party can have that this applies to C2 development. In my view that wording and use of "all" exists because the policy applies to all numbers of C3 dwellings (even a single dwelling). This is to make it clear that the national government threshold of 10 dwellings does not apply in this Council area. That is obviously and demonstrably why the policy says "all". The policy even goes to mention "dwellings". Again make reference to the legal opinion submitted. Dwellings are obviously C3. C2 extra care is obviously and categorically not dwellings as clearly indicated by numerous planning appeals with good examples being North Somerset 2168918, Stratford on Avon 2037666 and Tunbridge Wells 3161379. If we do however take an overtly literal reading of the policy which the Council are applying and accept that *"all residential development"* means every single type of residential development and not just C3 dwellings, even though the policy goes onto say and use the term "dwellings" then we end up with a ridiculous and preposterous situation. This would, on an objective reading of the policy as required by case law and national guidance, mean that anything of any kind that could be called residential would be required to provide affordable. This would to be ridiculous.
		However we already know that policy H4 does not apply to *"all residential development"* because the Council has said in writing that it does not apply to classic traditional care homes. The SPD itself implies this. The Use Classes Order 1987 as amended defines residential developments and divides them into 4 sub classes. C1 is hotels, boarding and guest houses. C2 is includes things like care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres. C2A are secure institutions and C4 is Houses in Multiple Occupation. You have other uses that can be described as residential like student housing and holiday units that fall outside the category. Clearly policy H4 does not apply to these uses yet if we take the peculiar literal reading of the policy which the Council are using then they must apply. If the policy does not apply to these uses then the SPD should explain why

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		it does not but it does not do this which is a significant and fundamental oversight given that the SPD says that its purpose is to explain the *"..expectations of the council in relation to the interpretation of the Local Plan policy".* Without this explanation what is excluded from "all residential units" it fails in this task. Although we have little explanation of what "self-contained units" means in paragraph 2.9 we still need to address this as best we can. What exist in a C2 extra care scheme as "self-contained units" are not self contained but instead they are part of a single planning unit. The simplest way to explain this is to turn to that North Somerset appeal 2168918 at Portishead. In that decision it recognises that the third Burdel principle is the most relevant (Burdle v Secretary of State for the Environment [1972] 3 All ER 240) to establish the planning unit. We have to look at whether, within a single unit of occupation, two or more physically different and distinct areas are occupied for substantially different reasons. The Inspector, very correctly in my view explains his response to the Council's argument which deals with mixed use and indeed self containment: *"20. On their own, and looked at in isolation, I have no doubt that each of the apartments is capable of being seen as falling squarely within Use Class C3, because they would provide all the necessary attributes of a separate dwelling. However, it is necessary to look at the interrelationship between the apartments and the rest of the building, and this goes beyond the physical arrangement, and involves an examination of the use of the separate parts and the building as a whole"* Just because units have the appearance of being able to be self contained does not mean that they are C3 units. That is, with all due respect, a simplistic argument. As was said in previous correspondence with the Council physical appearance is not definitive of the Use Class. A betting shop, in terms of layout and appearance, looks much the same as a bank but that does not mean they are in the same class. A hotel looks quite similar to a care home but that does not mean they are the same use class. This appeal, alongside many others, explains that the pure physical appearance is not definitive and that you can move on and look at the operational side that can be controlled via condition and legal agreement through negotiation if necessary. These issues around self containment seem un-arguable to me yet the SPD seems to be saying just because something happens to look like a dwelling or a self contained unit then the affordable policy applies. That makes no

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		sense and is so simplistic that is hard to believe the Council think that this "view" somehow changes and expands the meaning of H4 beyond any objective reading of its actual wording. These points on their own are enough in my view for any rational person to read policy H4 and see that it does not apply to C2 extra care. Resemblance to a independent unit of accommodation is common with many other types of residential buildings such as new build holiday units, a caretakers accommodation on a large employment site, hospital/school/staff accommodation in an employment use and student accommodation and so on yet there is no argument from the Council in their SPD that H4 applies to these. We can however go beyond these points above and look at the formation of policy H4. Our enclosed legal opinion points out the importance of viability testing and issues around that. But I can add that in reaching the interpretation the Council have they are setting aside the importance of the process of forming the policy and what this means. I would particularly refer the Council to para 173 of the NPPF: *"Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened".* In fact they have done the opposite of this. When C2 care was considered in the viability work for CIL and affordable housing it was shown that C2 was not viable for CIL payments. No affordable percentage was applied to C2 development in that testing process and no testing was carried out of any C2 extra care development. The Council have not done the work required to reach the interpretation they have of H4 and C2 extra care development. They have not shown or considered the impact of applying affordable housing to C2 extra care. Therefore the policy cannot apply to this C2 development. The viability work that was done on C3 dwellings is not relevant to us and our proposal because C2 extra care is an entirely different financial model with large non saleable communal areas, setting up a large staff group to provide services and care as well as the very different funding and return processes. The Examiner says in the recent North Somerset report on CIL the following things which prove this point that C3 viability assessments are not transferable to C3 extra care:

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		"67. The submitted CIL includes a proposed rate of £40 psm for C2 uses across all three charging zones in North Somerset. The point is made by representors that C2 extra-care housing is significantly different to general market housing in terms of structure and funding. Firstly, the funding streams for C2 schemes are generally provided up front by the provider, and with this comes an element of risk. In addition, a significant proportion of the total development floorspace is set aside for care and communal facilities. I was informed that these additional communal areas can typically lead to the net floorspace being around 55% to 60% of the gross floorspace, as evidenced by the Corby CIL Viability Study, which stated within its Executive Summary that: "care homes, extra care housing and other residential institutions are unlikely to be sufficiently viable to absorb any CIL contributions". *68. Furthermore, evidence was presented that in several cases, the „extra-care" dimension of C2 accommodation involves the setting up of an integrated care team on the site, together with specialist equipment, all of which is expensive and needs to be in place from the outset. These considerations all point to a fundamentally different viability model to C3 housing schemes".* *69... the Council's proposed CIL charge for C2 uses cannot be described as 'robust', which is a requirement of the PPG".*
		Conclusions The Council's interpretation of policy H4 contained in this draft SPD is incorrect and flawed. It is very difficult to see how such a view can be reached. I would refer to our enclosed legal opinion paragraph 7 where it quotes a case that says Councils *"..cannot make the development plan mean whatever they would like it to mean".* Due to the lack of viability work in the policy and numerous other reasons, such as the lack of any mechanism of how you apply affordable to a C2 development in the formation of the policy or the adopted text of the policy, the viewpoint that H4 applies to C2 extra care is really beyond any credible interpretation. We must also consider whether there is a development plan policy basis in this case for requiring a contribution for affordable taking it into account compliance with the Community Infrastructure Levy (CIL) Regulations 2010. Clearly with no evidence that the Council's interpretation of policy H4 was formed or examined in any way similar to the North Somerset CIL examination is clear evidence that the Council interpretation cannot be credible.

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		The reliance in the SPD on the purely physical point of the appearance "self-contained units" is simplistic and not supported by any case law or the weight of planning appeals. Enclosures – Legal Opinion J Cahill QC July 2016 Extract Local Plan Policy H4 – Policy and Text

Council's Response:

The council has carefully considered this representation. The final SPD has been amended accordingly to remove reference to application of the Policy to residential institutions housing people in need of care and nursing homes (Use Class C2) and to provide further explanation to the definition of Use Class C3 in the context of extra care units:

Paragraph 1.2:
1.2 The guidance in this SPD is relevant to anyone who wishes to develop a new residential property; from a single additional dwelling to large residential schemes. The Local Plan affordable housing policy applies to all planning applications which would result in a net increase in housing within the borough. It also applies to the provision of new extra care housing where this has the basic characteristics of a dwellinghouse[3]. ~~residential care and nursing homes and care villages~~. A summary document containing guidance for small residential developments is available separately.

Paragraph 1.6:
1.6 The SPD seeks to provide clear advice based on current information and expectations. However, it is written in a time of continuing change, with limitations to public expenditure, restrictions to the affordable housing funding regime, and changes to housing benefits and tenancies. In addition, further changes to planning policy through an updated National Planning Policy Framework are anticipated, including in relation to guidance and expectations in provision of housing for the aging population. ~~It seeks to provide clear advice based on current information and expectations.~~ This SPD will be updated if a new Local Plan policy approach is adopted through a formal Local Plan Review. ~~Details of how the council intends to respond to known changes in the interim period are set out, where relevant, in this SPD below.~~

Paragraph 2.9:
2.9 The need for affordable provision within residential (Use Class C3) schemes to meet the Crawley population's needs has been accepted. This recognised need covers all sectors of the population, including the growing numbers of elderly people. Therefore, i~~I~~ndividual, self-contained dwelling (Use Class C3) units, including flatted development, will still need to meet the requirements of affordable housing, even where these accommodate

[3] Use Class C3: Dwelling Houses

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occupants receiving care and/or are restricted to occupancy over a particular age. Some of these C3 dwelling units could be ~~and/or are~~ located adjacent to or within a wider site ~~complex~~ which includes some C2 (residential care/nursing home) rooms.~~, will still need to meet the requirements of affordable housing~~ Viability will be addressed on a case-by-case basis, in accordance with the policy requirements. Provision for affordable housing will therefore be expected from all dwellinghouses (Use Class C3), including ~~Sheltered~~ assisted living and extra-care accommodation.~~ schemes (Use Class C3), and residential institutions housing people in need of care and nursing homes (Use Class C2) where they include self-contained units.~~		
Colin Maughan		Thank you for providing me with your two latest supplementary planning documents to comment on – Affordable Housing. These documents are dense and complex, and I have a few comments on a dozen or so pages, but I think I will start by writing you a letter off the top of my head, while the contents of your reports are fresh in my memory. Crawley Borough Council may well be one of a minority of local authorities that still provides housing to meet needs in its borough (at present called "affordable housing"). Sheffield for example, another council I know something about, is trying to restore its devastated urban centre by building student residences – a response to the dubious growth in the business of "university" education, no doubt. Incidentally, the building regulations, which if adhered to ensure that tower block living is a pleasant, safe and satisfactory method of housing, do not apply to student residences. This state of affairs needs urgent attention. As the British economy seems to rely precariously on our arms industry, tourism, and the sale of homes and cars (that people cannot afford) it is difficult to avoid the suspicion that a shortage of houses to buy or rent is maintained in order to keep prices unduly high. In fact there is a lot of empty property. Much accommodation over shops remains empty due to lack of a separate access outside or behind shops, and much new accommodation is built as an investment with little or no intention of it ever being occupied. In social terms this is surely a crime. Similarly the Right to Buy is without question a ploy to assist the building industry, and it seems to be unique to Britain. Elsewhere, especially in Europe, renting property works very well, and is not an unduly expensive method of housing like ours. Ours leaves people in poverty or working unduly long hours. For the foreseeable future we will have to tolerate a system where social responsibilities have been overtaken by the profit motive and as was recently demonstrated in the Grenfell Tower fire, a sound planning system has been high-jacked for the benefit of developers, and property sold entirely as an investment.

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		When I worked with architects and planners in the 1960s, Leicester City Council avoided reliance on developers and employed its own direct labour force. In addition to having a large public housing portfolio it also built the first new theatre in Britain since World War One (designed by my architect colleague Peter Forbes). This alternative approach to building development reminds me that I haven't read anything in these reports about housing trusts like the Peabody and the Guinness, and I wonder if these alternatives have been explored in the efforts to close the housing gap.
		Recent Governments have made it clear that they are not satisfied with current planning legislation, and they wish to change it. they have not been very specific, but it's taking thirty-five years to get the trains to run once the Channel Tunnel was completed might have been mentioned as an example of bureaucracy dragging its feet. The council's reports may not be the right place to deal with such issues but several modern tendencies, if pursued with undue vigour, populism, targets and managerialism* in general are killing the "patients". *Managerialism; probably inherited from the Civil Service, and much aided by the use of computers, is killing our services, teachers, nurses, the police and firemen. The mention of Leicester Council's policies above reminded me that non-conformism makes people unpopular. As soon as I began to read the Affordable Housing reports, I wondered about "Unaffordable Housing" (all other housing, presumably) and asked myself where their contents would entirely conform with the present Government's aim to channel our people to having larger debts, resulting from buying houses and cars. Stitching themselves up, in other words, due to an innate tendency to conform with the majority who behave like sheep. Unfortunately, the all too successful marketing of people's largest investments wouldn't leave enough of their income to spend on high quality food and clothing, so these are imported and sold too cheaply to support industries in this country. I visited one of our local woodyards recently, and there was not one piece of sound timber, apart from recycled railway sleepers. Our forestry industry has been ruined in recent years, and the move to a throw-away, wasteful society has resulted in the opening of huge landfill sites.
		One of my neighbours, who has lived here for at least fifty years, said "These houses are not suitable for modern living" (Shrublands). She couldn't be more mistaken, but I know that Crawley Council finds that tenants in its housing often expect a council makeover to give them the latest trendy kitchen, regardless that the one they have is as good as new.

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	Page 15	Page 15 of the main Affordable Housing report deals with Design. I can't remember what was said in the earlier reports, but this section in Part 3 only covers the subject in a minimal planners' way, as compared with architects' concerns. As a result, densities, which are now sometimes unsatisfactorily large; security; privacy; quality of life (in cul de sacs for instance); outlooks from windows, gardens, hanging washing out; bonfires; noise from roads; aircraft, neighbours; tree planting; containment of cars for owners, tenants and visitors; vans; caravans; boats; communal space; exhibitionism of posh car owners who pave their gardens to show them off, resulting in flash floods and so on.
		Crawley council has been very successful in keeping to the New Town's original planners' and architects' design in keeping to Crawley's natural boundaries, and avoiding urban sprawl into the countryside. But recent developments between Crawley and Horsham have threatened to end this policy. Also the self-contained neighbourhoods concept is in danger of being lost. This could damage the convenience of nearby shopping and also increase the motor traffic as people in housing only schemes drive to shops, schools, libraries and churches. We already have serious daily traffic jams at peak times for schools and travel to and from work. Bus and taxi services are quite good (in poorly built buses) but train services at peak times and weekends are best described as Hellish. I have always worked in London, so I wouldn't come to live here now, unless I had retired.
		The report takes it for granted that one bedroom housing will always be in the form of flats. But it doesn't say why. The single bedroom houses in nearby Forestfield are excellent and anyone would like one.
		Increasingly, people are working from home, and when people are made redundant in middle age their prospects of finding another job are not always good. So they start their own firm. Also there are growing numbers of single parent families. I don't know, but I would have thought that these changes in society might bring in a need for homes with non-traditional layouts. My friends in Hackney for instance live in a scheme built for tenants requiring a workshop, so the housing has an industrial standard floor loadings and a three-phase electrical supply system suitable for machines.
		Anyone seriously interested in housing design could learn a great deal by examining this housing association scheme Shrublands and Forestfield in detail. For instance we all have front and back gardens, integral garage/workshops, rooms with windows in two walls, clear storey windows giving direct daylight on the first floor, toilets on both floors, almost all windows opening, entrances to the gardens back and front, space standards above the Parker Morris

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		minimums, some larger houses having an internal courtyard, and so on. All the result of very careful design. As with prestigious housing the architects provided a maintenance manual, as with a motorcar.
		Housing of this standard dating from the 1960s, by Phippen Randall and Parkes, Walter Segal's self-build in South London, Eric Lyon's various span schemes and Z Bed in Sutton, have proved that a good home can be provided for about 33% of current house prices if the monopolistic companies are avoided. They use common building materials and components provided by similarly large players, like Marshall's. My house would have cost £2000 to £3000 in the early 1960s. Authorities like highway engineers and building inspectors also have a stranglehold on housing with their age-old dogmas, and lack of interest in the housing problem. One of the things we need to know even on the unsatisfactory houses on offer is the cost of building compared with the "rental" price. This information will be available routinely to insurance companies involved in setting claims on written off houses.
		One of the mixed blessings characteristic of our existing planning laws and building regulations is "zoning". This leads to an almost complete separation between housing and industry. The Crawley neighbourhoods have always combined both, but using largely imported Chinese components and materials.
		It has always been difficult to create a sense of community when the working class families, who are usually fairly sociable, live in one zone, and the middle class, who are not usually very sociable, live in another zone. This situation is beginning to change a little as long term empty offices in industrial estates are converted into schools and flats, resulting in an interesting mix, as in Europe.
		Although this report doesn't deal with Conservation Areas, some factors here apply to new developments in addition to questions of design in housing.
		There was a time when architects were involved in most or all work involving the built environment and they put up their red RIBA sign boards. Judging by appearances and the lack of architects' signs many developments now do not

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		have the benefit of an architect's skills. They appear to come, like modern car and lorry design, straight from a mediocre computer programme.
		Not only this, but due to long-term failure in training people for the building trade, and the failure of the council's building inspectors, most of the seventy houses in the Shrublands "Conservation Area" have been ruined. I visited one of my neighbours last week who has had a kitchen make-over recently and his wheelchair has already destroyed the newly laid fancy wooden floor laid over the original concrete and plastic tiles.
		Similarly most of the mature trees on this scheme have been ruined by untrained men with chainsaws.
		Who is going to build all these new houses? I ask myself every day. Presumably skilled foreign workers, as with the long-term scheme in Queen's Square. Prime Minister Harold Macmillan is the only one I can remember who had any intention of solving Britain's housing problem. Most subsequent Governments have shown little or no concern about the country or its people.
		As I may have already said, this document is very thorough and impressive, but as were some of the previous reports, it will be difficult to access, and it would benefit from an index (regardless of the additional cost). The provision of a glossary on page 56 is very helpful, and the report in general is pleasingly readable and free of acronyms. The glossary doesn't include the "clustering" dealt with on page 16. I assume this includes buildings with common/party walls and possibly common foundations. One of the minor problems with these homes in Shrublands is that common foundations increase noise levels and vibration. I imagine this wouldn't be too difficult to avoid on new schemes.
		If necessary, I could come back to you with minor editorial comments – for instance the unnecessary capitalisation in the Glossary entries. But that would be nit picking. For once a rule of if in doubt use a capital letter (rather than lowercase) works well. I think you may find something of use or interest in this quite long letter.

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		PS. At a time when Whitehall is ineffective apart from cutting services, only able to do nothing or make mistakes (with Brexit, the NHS, prisons, railways, education and housing) local government is still doing valuable work.

Council's Response:

Comments noted. Some detailed responses to some of the particular points raised are set out below:

- The Local Plan or the SPD would not restrict any models that tick the box of meeting local housing needs at an acceptable level of affordability.
- The Urban Design SPD is a more comprehensive document in relation to the design expectations of all new development, regardless of tenure, this is cross-referenced in the Affordable Housing SPD (paras. 1.7 and 3.27). Paragraph 3.27 (page 17) of the draft Affordable Housing SPD is clear that affordable housing is expected to be accommodated at its maximum level and so external space standards should be implemented on that basis.
- The Tenancy Agreement usually restricts tenants from hanging washing on balconies, disturbing neighbours, etc.
- One-bed houses would be acceptable if offered, but it is not the most effective use of land, and the issue is actually to ensure that developers provide two-bed houses and not provided just two-bed flats, which is the intention of the wording.
- Trees are covered by the Green Infrastructure SPD.
- Clustering can be added to the glossary, although in this document it relates to the grouping together of small groups of affordable housing properties integrated within a wider scheme for ease of management and maintenance purposes for RPs. It does not relate to common foundations as referenced.
- Modern standards have very robust noise insulation standards between floors and party walls.