

# **PINS advisory video conference, 2 April 2020**

## **Crawley Borough Local Plan**

### **Inspector notes**

#### **1. Introduction**

This is a summary of the advisory conference that took place on 2 April. The Council very helpfully produced a list of questions in advance of that session, and these notes aim to answer those questions as far as possible. Some questions however can only be resolved by the Inspector conducting the examination. The numbered topics below do not follow the numbering in the Council's set of questions; rather, I have sought to bring related issues together.

#### **2. Plan review**

The concept of a proportionate, whole plan review appears to be appropriate, but obviously it will be for the examining Inspector to conclude on soundness.

#### **3. Strategic policies**

See paragraph 20 of the NPPF. The Council need to reconsider the approach taken by the draft plan towards strategic policies since many policies marked "strategic" cover non-strategic subjects. Strategic policies are those that set out an overall strategy in relation to spatial distribution (pattern) scale and quality relating to housing, infrastructure, community facilities, heritage, green infrastructure and climate change. The key lead-in policies for each topic may often be the strategic ones.

#### **4. Meeting housing and other needs**

The Crawley Local Plan cannot meet all its housing or employment needs. In this situation an Inspector would examine what work had been done to explore all possibilities for accommodating needs within its area. Such work might include reviewing the redevelopment potential of sites, areas and buildings, examining densities, reviewing open space and, where relevant, undertaking a landscape appraisal and a Green Belt review. An Inspector would also look at any Statement of Common Ground produced (nt)1 ( o)-6 other local authority areas in north West Sussex. In the c the Inspector is likely to look for something more than the



would not be appropriate because AAPs should be consistent with the strategy of the submitted plan.

This would suggest that

plan in order to decide either that it is fully up-to-date, or that factors such as changes in local circumstances and/or to national policy mean that it needs revising or updating. It appears that the Council has, in effect, already carried out that review as a precursor to the preparation of the new plan for submission. Consequently, there is no difficulty in holding over the plan's submission until the full evidence base and SoCG are in place and until further Regulation 19 consultation has taken place.

## **8. Urban design and related policies**

I appreciate what the Council is aiming to achieve in terms of urban design, but would suggest that there is too much overlap between the character, movement, layout and scale policies. This risks reducing their legibility for stakeholders and decision makers and hence their effectiveness. I would suggest that CL2 should be the main strategic policy for urban design, containing all the main urban design principles (such as permeability, legibility, connectivity active street frontages, natural surveillance, the quality of spaces, the role of density, the use of design review and other participatory techniques and so on) and cross-referencing to subsequent non-strategic policies, each of which should deal solely with a single topic: local distinctiveness, movement, density requirements, masterplanning and so on. DD1 deals with living conditions and does not need to stray into urban design.

The plan can set out density policies, but should recognise that on-the-ground densities need to take into account other factors such as local character and heritage, housing mix and proximity to public open space.

## **9. Employment**

The NPPF states that planning policies should set out a clear economic vision and strategy and plans should meet anticipated needs over the plan period. These include the requirements of different sectors including clusters of knowledge, data-driven, creative and high tech industries. These won't necessarily be predicted by extrapolating past trends.

I would suggest that the policy situation is not the same now as it was when the current local plan was examined. The NPPF says that local plan policies should positively and proactively encourage sustainable economic growth. With the safeguarding of land at North Crawley still in place, the Council should be proactively seeking to accommodate unmet economic needs in nearby authority areas through the DtC.

Obviously, if a decision were made to release the safeguarded land, the implications of this could lead to a different strategy, but as previously pointed out, this would be the subject of a plan review.



applicants and decision makers, there needs to be greater clarity about the standards applicable in different circumstances.

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Regarding water efficiency and Policy SDC3, the PPG on optional technical standards states that where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. Policy SDC3 mentions this standard, but then talks of tighter targets of 100 litres/person/day and 80 litres/person/day. This part of the policy lacks precision because it contains no clear indication as to when these tighter standards would be sought, and the evidence that would support such standards specifically for Crawley is unclear.

I understand that local authorities in the area are working with the water industry on the possibility of promoting tighter efficiency standards than the Building Regulations optional requirement, and one reason given is to compensate for the lower water efficiency of the existing housing stock. National planning policy does not refer to this possibility, and such an

