

Horsham District Local Plan Examination: Inspector's Matters and Issues

Crawley Borough Council Hearing Statement

April 2026

Matter 3: Homes to meet the needs of all the community

b. Whether the proportion of affordable housing sought from each site is appropriate.

- 1.1 Crawley Borough Council (CBC) submitted formal representations (Response #1194005 [Crawley Borough Council Response - Horsham District Local Plan 2023 - 2040 \(Regulation 19\)](#)) to the submission draft Horsham District Local Plan (HDLP) Regulation 19 consultation on 1 March 2024.
- 1.2 In particular, CBC **strongly supported** the recognition of the joint evidence supporting both the HDLP and the Crawley Borough Local Plan 2023 to 2040 (CBLP) and the need and viability for the provision of 40% affordable housing. In relation to Policy HA2, 2a. CBC **strongly supported** the requirement for a minimum of 40% of the homes to be affordable housing, should West of Ifield continue to be allocated in the Horsham District Local Plan.
- 1.3 The comments made at that point remain standing. This Hearing Statement seeks only to provide factual updates on progress since then.
- 1.4 It is noted that hearing sessions in relation to the Strategic Sites will be for a later session. This Hearing Statement only provides updates in response to the Inspector's question under Matter 3b – whether the proportion of affordable housing sought from each site is appropriate.

National Planning Policy

- 1.5 National Planning Policy Framework 2024 (NPPF) paragraph 27c is of relevance: *“Once the matters which require collaboration have been identified, strategic policy-making authorities should make sure that their plan policies align as fully as possible with those of other bodies where a strategic relationship exists on these matters, and take into account the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary. In particular their plans should ensure that: ...
c) any allocation or designation which cuts across the boundary of plan areas, or has significant implications for neighbouring areas, is appropriately managed by all relevant authorities”*.
- 1.6 The draft consultation NPPF, whilst not published in its final form, provides an indication of the direction of travel for the current government. Draft Policy PM10(2) confirms that *“Plan-making authorities should ensure their plan policies align as fully as possible with those of other bodies where there are strategic interdependencies across boundaries, including neighbouring and other relevant nearby plan-making authorities. In doing so they should take into account the relevant infrastructure and investment plans of infrastructure providers and authorities”*.

Crawley Borough Local Plan

- 1.7 The [Crawley Borough Local Plan 2023 to 2040](#) (the 'CBLP') was adopted by Full Council on 16 October 2024. It is acknowledged that the CBLP is not the Local Plan for the administrative area in which the West of Ifield allocation lies. However, strategic development in this location, immediately adjacent to the borough boundaries, offers unique opportunities to help meet Crawley's housing needs unable to be realised within the scope of the CBLP which is constrained within Crawley's administrative boundaries.

Crawley Borough Affordable Housing Need

- 1.8 Horsham Local Plan Evidence Document H01 [Northern West Sussex Strategic Housing Market Assessment](#) (SHMA) provides the basis for the adopted CBLP housing needs. This confirms that for Crawley borough there is a need for 739 affordable homes per year (563dpa rented affordable housing and 176dpa affordable home ownership). This is against the borough’s adopted Standard Method housing need figure of 755dpa.
- 1.9 The CBLP Policy H5 requires 40% affordable housing from all residential developments (including those below 10 dwelling threshold) outside of Crawley Town Centre. Viability assessment undertaken as part of the CBLP preparation concluded that for developments within the town centre, it would only be possible to secure 25% affordable housing.
- 1.10 The anticipated delivery within the Town Centre over the CBLP Plan period (2023 to 2040) is 2,087 dwellings out of the total supply 5,330 dwellings (39%). In addition, due to the higher densities being required by the policies within the CBLP for brownfield development sites within eight minutes walking distance from Crawley rail and bus station and Town Centre Fastway stops, it is expected the largest proportion of windfalls projected over the Plan period will occur within the Town Centre.
- 1.11 However, excluding town centre windfalls (i.e. assuming all windfalls are subject to 40% affordable housing requirement), the level of affordable housing which could be secured within Crawley borough based on the CBLP policy would be 1,819 dwellings. This represents just 14% of the total affordable housing need (107dpa compared to the need of 739dpa identified in the SHMA).

	CBLP Anticipated Housing Delivery (Total Dwellings)	CBLP Affordable Housing Policy Requirement (%)	Affordable Housing Provision (Dwellings)	Affordable Housing Provision (dpa)
Housing Delivered Outside Crawley Town Centre	3,243	40	1,297	76
Housing Delivered Within Crawley Town Centre	2,087	25	522	31
Total Housing Delivered	5,330		1,819	107

- 1.12 The [Horsham District Council and Crawley Borough Council Statement of Common Ground July 2024](#) (HDC/CBC SoCG) (Document Reference DC04) confirms the agreement between the two authorities in relation to affordable housing (paragraphs 3.9 to 3.12).
- 1.13 It should be noted that, whilst general housing needs arising from Crawley (i.e. market housing) can be met in the wider Northern West Sussex Housing Market Area, affordable housing provision can only be met within sites close to the borough’s administrative boundaries, as this is where it is possible for the councils to agree shared nomination rights’, as set out in paragraph 7.3e of the HDC/CBC SoCG.

CBLP Urban Extensions ‘At Crawley’

- 1.14 Horsham Local Plan Evidence Document H01 [Northern West Sussex Strategic Housing Market Assessment](#) considers the “At Crawley” position in respect of housing, in paragraphs 5.86 to 5.89 (pages 58 to 59). This confirms that development adjoining

Crawley, but beyond the borough’s administrative boundaries, would contribute to meeting Crawley’s housing needs. Therefore, it recommends that it would be appropriate for discussions regarding the mix of housing within such development to have regard to the housing needs of Crawley identified within this Study, including both the affordable housing need and findings regarding the mix of homes needed (paragraph 5.89 and Local Housing Need: Implications summary box).

- 1.15 The adopted and up-to-date CBLP anticipated strategic urban extensions may come forward outside its boundaries and sets out an indication of what CBC would expect from developments close to its boundary.
- 1.16 The CBLP (paragraph 12.18) confirms that:
“Well planned urban extensions which provide comprehensive, sustainable new neighbourhoods with local facilities and services, relate well to their rural landscape character and protect the setting of Crawley’s neighbourhoods could form an important way to meet Crawley’s housing needs. Therefore, the Local Plan acknowledges that other potential urban extensions to Crawley outside its administrative area could be explored in the future in order to meet the arising housing need of the borough...”
- 1.17 Paragraph 12.20 highlights that:
“In considering urban extensions, the shared evidence base including the Strategic Housing Market Assessment and Economic Growth Assessment should be referred to. Whilst located within Mid Sussex or Horsham Districts, any urban extension on the edge of Crawley should be meeting the unmet housing needs arising from Crawley, and should therefore meet Crawley’s specific needs for affordable housing, housing mix, type, and tenure...”
- 1.18 The considerations set out in paragraph 12.23 of the CBLP include:
“Housing development through urban extensions on or close to Crawley’s administrative borough boundaries will be supported by Crawley Borough Council where it can be shown that:
 - vii. *The development helps address unmet development needs arising from Crawley, including in relation to housing mix, type, tenure and affordability (including meeting the 40% affordable housing levels and agreements in relation to the nomination rights for those on the Crawley housing register);...*
- 1.19 The approach taken in the CBLP was accepted and endorsed by the Inspectors for the independent examination into the CBLP, in their [Crawley Borough Local Plan Inspectors' final report September 2024](#), paragraphs 58 to 59:
58. At a strategic level, we consider it is justified that the Plan is predicated on a strategy of optimising development in Crawley and then seeking to see development needs accommodated as close to Crawley as possible. We accept, as part of the latter, the Council would be reliant on neighbouring planning authorities. This, however, is not unreasonable given previous plan making and the indications that both Horsham and Mid Sussex are contemplating strategic urban extensions to Crawley as part of their current plan-making. Accordingly, we consider the Plan is justified in setting out the position of Crawley Borough Council, as a local planning authority, with regards to development ‘At Crawley’. Prudently, the Council recognises that it cannot set policy in its Plan to materially affect what would be a decision for another local planning authority. However, given any strategic growth on the edge of Crawley would give rise to impacts on Crawley it is justified that the submitted Plan sets out content on “Urban Extensions at Crawley” including Crawley-centric considerations.

59. *These considerations are set out at paragraph 12.23 of the submitted Plan. As submitted the Plan articulates what would be required for Crawley to support adjacent growth proposals, that is not the same as setting policy requirements. Nonetheless, they comprise reasonable expectations for sustainable development given the immediate impact of wider growth 'At Crawley', particularly on matters such as character and infrastructure, would be keenly experienced by communities in Crawley. On this issue, we find the Plan's approach to likely peripheral growth in neighbouring authorities to be sound.*

- 1.20 Critically in relation to affordable housing, the CBLP Inspectors' final report stated: "we consider the evidence of an acute unmet affordable housing need supports the case that any strategic housing growth at the edge of Crawley should seek to positively respond to this issue if growth 'At Crawley' is to be genuinely sustainable for the town and its immediate hinterland" (paragraph 185).

* underline CBC emphasis.

Affordable Housing Viability and Delivery

- 1.21 The CBLP was supported by viability testing: [Crawley Borough Local Plan and CIL Viability Assessment 2021](#) (paragraphs 3.7.31 to 3.7.35, pages 78 to 79) and its update [Viability Assessment update December 2022](#). There are no further strategic sites available within the borough's administrative boundaries. However, the assessment considered a greenfield "at Crawley" potential scenario of a mixed use development of 1,000 dwellings. The Viability Assessment was based on the requirements from the Crawley Borough Local Plan (i.e. in terms of 40% affordable housing and the CBLP housing mix along with all of the other policy requirements, s.106 contributions and Community Infrastructure Levy). This confirmed that this form of development should have reasonable prospects of coming forward viably. Furthermore, it was acknowledged that CIL could be reviewed and such a scheme could include a higher level of scheme specific and related infrastructure/development mitigation required through s.106. Large scale, strategic developments are commonly nil-rated or low-rated for CIL as part of a differential charging set up and are zoned or described accordingly, with overall viability (particularly once informed by more specific information) and these related factors considered. Notwithstanding this, the Viability Assessment concluded that a proposal of this nature is considered capable of supporting infrastructure costs combined with Crawley's CIL. The results indicate that costs at least equivalent to the current CIL charging level and most likely at a significantly higher overall level should be viable. Based on this review neither the CBLP policy proposals, including the 40% requirement for affordable housing, nor the Crawley Borough adopted CIL were considered to be prejudicial to the viability prospects for such development.
- 1.22 This conclusion is supported by Horsham Evidence [Horsham Local Plan Viability Assessment 2023](#) (Document Reference number H12) and [Horsham WPV EiP Addendum 2024](#) (Document Reference number HDC15). This confirms that the increased provision of 40% affordable housing does not change the conclusions drawn in the original assessment and the site is viable and deliverable.

Forge Wood

- 1.23 The last new neighbourhood "At Crawley" within Crawley's administrative boundaries is currently being built out. The strategic site is for 1,900 new dwellings, employment, open spaces and a neighbourhood centre along with the associated necessary infrastructure.
- 1.24 Detailed monitoring as on-site delivery is nearing completion confirms that this neighbourhood is delivering an excess of 40% affordable housing (at 40.5%). It will be a closer competitor to the new neighbourhood West of Ifield than other sites elsewhere in

Horsham District. Therefore, a 40% requirement at West of Ifield would not put it at a competitive disadvantage whilst helping address an acute affordable housing need. Furthermore, in the Crawley (and by implication 'at Crawley') context, the affordable housing element has not been a competitive disadvantage but has enabled demand/delivery to hold up even where private market demand is sluggish or subject to cyclical downturns.

Conclusion

- 1.25 CBC maintains its strong support for HDLP Policy HA2 2a requiring 40% affordable housing as part of a Strategic new neighbourhood at West of Ifield, as set out in its Regulation 19 representation to the HDLP. This is based on its adopted Local Plan paragraphs on Urban Extensions and its endorsement by the CBLP Planning Inspectors' report as set out in sections 1.23 to 1.24 above and the joint and separate evidence base.