Crawley Local Plan

Crawley Borough Submission Local Plan 2024 Topic Paper 1:

Unmet Needs and Duty to Cooperate

Crawley Borough Council

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1. Introduction

1.1 This Topic Paper explains the approach of the Local Plan in seeking to meet the objectively assessed development needs for the borough, established by the supporting evidence. In particular:

- Policy H1: Housing Provision
- Policy H5: Affordable Housing
- Policy H7: Self and Custom Build
- Policy EC1: Economic Growth
- Policy IN1: Infrastructure Provision

1.2 This Topic Paper should be read in conjunction with the objectively assessed development needs and detailed supply-led approach set out in:

- Topic Paper 3: Housing Needs (which establishes the borough's full projected housing needs);
- Topic Paper 4: Housing Supply (which explains the approach and extent to which housing needs can be met within the borough); and
- Topic Paper 5: Employment Needs and Land Supply (which covers the borough's employment needs and employment land supply).

1.3 This Topic Paper sets out the remaining unmet needs which are unable to be accommodated within the borough and how these are being addressed. In particular it highlights the ongoing work and any outcomes of key progress made to date in relation to these through the Duty to Cooperate. The Duty to Cooperate Statement shows how the Local Plan review has been prepared in relation to cross-boundary strategic issues including meeting development and infrastructure needs.

1.4 The development needs of the borough and the outstanding unmet needs are summarised in Table 1 below.

Table 1: Summary of Development and Infrastructure Needs and Unmet Needs

	Objectively Assessed Development and Infrastructure Needs	Local Plan Provision	Unmet Needs
Housing	12,080 dwellings (755dpa)	5,030 dwellings (314dpa)	7,050 dwellings (441dpa)
Affordable Housing	11,824 dwellings (739 dpa)	2,012 dwellings*[1] (126 dpa)	9,812 dwellings (613 dpa)
Self- and Custom-Build Housing	104 Part 1 entries on the Register (136 total entries)	Policy H7 requirement for residential developments of 50 or more dwellings to provide 6% of the area occupied by residential plots in the form of serviced plots for self-build and custom housebuilding.	Difficult to assess - planning permissions in place which 'could include self-build and custom housebuilding' as set out in legislation.
Gypsy, Traveller and Travelling	No immediate need determined to date – to		None currently identified – subject to outcome of

[1] Note: This is a maximum based on the delivery of 40% from the total housing anticipated within the borough. See Topic Paper 3 which explains the reasons why it is not possible to achieve this and why the delivery of affordable housing through contributions from market housing will be significantly reduced.

	Objectively Assessed Development and Infrastructure Needs	Local Plan Provision	Unmet Needs
Showpeople: five year need	be confirmed subject to outcome of updated Needs Assessment		updated Needs Assessment
Gypsy, Traveller and Travelling Showpeople: potential future need over Plan Period	10 pitches	One new reserve site for up to 10 permanent residential Traveller pitches	None
Employment: Total Business Land (New Provision on sites within Main Employment Areas)	26.2ha	14.49ha	None
Employment: Of which Industrial Land (Provision on land within Main Employment Areas)	22.9ha	9.17ha	
Employment: Of which Industrial Land (Provision through the allocation of a new Strategic Employment Site	13.73ha	13.73ha	None
Education	A site for a 8-10 FE secondary school is required.	Policy IN1 – S106 or CIL requirements. Policy IN2 – allowance for consideration of education provision on allocated housing sites.	4-6 forms of entry Secondary Education during the Local Plan period.
Health	Existing issues with Primary Care premises, and they cannot meet the needs of the growing population.	Policy IN1 – S106 or CIL requirements.	Primary Care Networks (PCNs) to increase resilience and enhance capacity.

2. Background

2.1 Crawley Borough Local Plan 2015

2.1.1 The currently adopted Local Plan confirms that there is very limited land within the borough for accommodating further development. This is due to several factors including:

- Crawley's tight administrative boundaries;
- the historic Gatwick Airport 'safeguarded' land for a potential southern runway and aircraft noise constraints;
- flooding;
- nature conservation constraints; and
- few infill opportunities due to the age and planned nature of the New Town.

2.1.2 In finding the adopted Local Plan legally compliant and sound, the Planning Inspector for the 2015 Local Plan concluded that:

"Overall Crawley has adopted a process of continuous engagement with neighbouring authorities in seeking to meet its strategic needs. Whilst it has not yet been able to secure in full the future provision of its unmet needs, there is no compelling evidence that such failure has resulted from the council not promoting its case with sufficient vigour. I consider that the legal requirements of the duty to cooperate have been met"[2].

Housing

2.1.3 Paragraph 2.23 of the adopted Local Plan confirms that Crawley's housing market functions within a wider geographic area. This is identified as the Northern West Sussex (NWS) Housing Market Area (HMA). It is predominantly within the local authority administrative areas of Crawley Borough, Horsham and Mid Sussex Districts, extending northwards into the administrative area of Reigate and Banstead Borough to a lesser degree. It should be noted that Reigate and Banstead, as a whole, operates in the East Surrey housing market and it is acknowledged that this differs to functioning wholly in the NWS HMA.

2.1.4 There is already long-established, effective joint working within the NWS HMA. This includes recognition in the adopted Local Plans for Horsham, Mid Sussex and Reigate and Banstead that their housing provision figures will contribute to meeting the wider needs of the NWS HMA and support the delivery of economic growth within the Gatwick Diamond[3].

2.1.5 Historically, Crawley Borough Council (CBC) has worked jointly with Mid Sussex and Horsham Councils (MSDC and HDC, respectively) to maximise the sustainable delivery of housing needed for the HMA. This has included joint commissioning of key strategic studies, including:

- the At Crawley Study (2009);
- the New Market Town Study (2010); and
- West Sussex Bio City (2010);
- along with the adoption of the Joint Area Action Plan for West of Bewbush (2009).

The Joint Area Action Plan directly resulted in the subsequent build-out of Kilnwood Vale, currently under construction, as a new neighbourhood to Crawley within Horsham district.

2.1.6 Adopted Local Plan Policy H1 commits the council to working closely with its neighbouring authorities, particularly those within the NWS HMA, in order to meet Crawley's unmet need in sustainable locations. This is carried out through exploring opportunities and resolving infrastructure and environmental constraints. The Policy confirms this will include continued assessment of potential future urban extensions to Crawley.

2.1.7 Crawley's unmet housing need established from the adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Table 2 below provides an updated overview of the current adopted housing supply position within the North West Sussex area. This shows that the combined local housing need set out

[2] Report on the Examination into Crawley Borough Local Plan 2015-2030, para. 11 (November 2015) Martin Pike, The Planning Inspectorate https://crawley.gov.uk/sites/default/files/documents/PUB270981.pdf
[3] Reigate and Banstead Core Strategy, para. 7.4.1 – 7.4.4 (2013) RBBC; Horsham District Planning Framework, para. 6.3 (2015) HDC; Mid Sussex District Plan 2014 – 2031, Policy DP4: Housing, second paragraph, page 30, and Policy DP5: Planning to Meet Future Housing Need, pages 33-34 (March 2018) MSDC

in the current round of adopted Local Plans will be addressed, albeit with a small indicative deficit.

2.1.8 As shown in Table 2, against the annual Plan figure there is a shortfall of 97dpa. However, when this is considered over full anticipated delivery across the Plan periods, it results in 527 dwellings outstanding (equal to 35 dwellings per year over the 15 year Crawley Plan period).

2.1.9 Since the adoption of the Local Plan in 2015, Crawley has delivered a total oversupply, against the Crawley Borough Local Plan annualised average requirement, of 966 dwellings[4]. It should be noted that delivery of new development within the borough in more recent years (2020 – 2023) has been affected by the Covid-19 pandemic and then the need to achieve Water Neutrality.

Table 2: NWS HMA Adopted Local Plan Housing Needs and Supply

	Crawley	Horsham	Mid Sussex	NWS HMA total
Existing Local Plan Objectively Assessed Housing Needs (per annum)	675dpa	650dpa	876dpa	2,201dpa
Existing Local Plan Requirements (per annum)	340dpa	800dpa	964dpa	2,104dpa
Difference (per annum)	-335dpa	+150dpa	+88dpa	-97dpa
Existing Local Plan Objectively Assessed Housing Needs (total over Plan periods)	10,125 dwellings	13,000 dwellings	14,892 dwellings	38,017 dwellings
Existing Local Plan Requirements (total over Plan periods)	5,100 dwellings	16,000 dwellings	16,390 dwellings	37,490 dwellings
Difference (total over Plan periods)	-5,025 dwellings	3,000 dwellings	1,498 dwellings	-527 dwellings (-35dpa)

Employment

2.1.10 The adopted Local Plan Policy EC1 acknowledges a potential for a shortfall of 35ha of business land provision arising within the borough over the Plan period. Therefore, the Local Plan takes a sequential approach to identifying appropriate locations for new business-led growth, focusing respectively on delivering sites on:

i. Land within Crawley, in the north of the borough (this would be reliant on the ability to remove safeguarding for a potential future southern runway at Gatwick Airport);
ii. Land at Crawley/Gatwick, in the areas immediately adjoining the borough;
iii. Land near Crawley/Gatwick.

2.1.11 Horley Strategic Business Park[5] is anticipated to provide approximately 200,000 square metres of office-led employment floorspace. This allocation will meet a significant proportion of Crawley's identified office needs from the adopted Crawley Local Plan 2015, on land at Crawley/Gatwick. However, it will not meet any of its outstanding industrial needs.

[4] 3,346 Total of net dwellings (2015/16: 541 dwellings; 2016/17: 596 dwellings; 2017/18: 369 dwellings; 2018/19: 512 dwellings; 2019/20: 404 dwellings; 2020/21: 568 dwellings; 2021/22: 356 dwellings) – 2,380 Total annualised average (340 x 7) = 966 dwellings

[5] Allocated by Policy HOR9 of the Reigate and Banstead Development Management Policies DPD

2.2 Legislation

2.2.1 The Localism Act 2011[6] places a legal Duty to Cooperate on local planning authorities and other prescribed bodies to work together to address relevant strategic planning issues in the preparation of their Local Plans.

2.3 National Policy

2.3.1 National planning policy[7] is clear that the starting point for Local Plans is that they are prepared based on a strategy which, as a minimum, provide for objectively assessed needs for housing and other uses, unless:

i. The application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

1.3.2 The NPPF requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies. This includes, but is not limited to:

- those who require affordable housing;
- families with children;
- older people;
- students;
- people with disabilities;
- service families;
- travellers;
- people who rent their homes; and
- people wishing to commission or build their own homes[8].

2.3.3 The NPPF confirms that joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere[9].

2.4 Evidence

2.4.1 Relevant Key Evidence supporting the draft Local Plan includes:

- Standard Methodology for Assessing Local Housing Need (February 2019) MHCLG
- Northern West Sussex Strategic Housing Market Assessment (2019) Iceni Projects
- Strategic Housing Land Availability Assessment (2022) CBC
- Housing Trajectory (Base Date 31 March 2023) CBC
- Crawley Borough Council: Windfall Allowance Statement (May 2023) CBC
- Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2023) CBC
- Northern West Sussex Economic Growth Assessment (January 2020) Lichfields
- Economic Growth Assessment focused update for Crawley (September 2020) Lichfields

[6] Section 110 of the Localism Act provides the legislative basis for the Duty by transposing it into a new Section 33a of the Planning & Compulsory Purchase Act 2004.
[7] National Planning Policy Framework (NPPF), para. 11 (2021) MHCLG
[8] NPPF, para. 62 (2021) MHCLG
[9] NPPF, para. 26 (2021) MHCLG

- Economic Growth Assessment supplementary update for Crawley (January 2023) Lichfields
- Employment Land Trajectory (Base Date 31 March 2023) CBC
- Employment Land Availability Assessment (Base Date 31 March 2023) CBC
- Draft Sustainability Appraisal/Strategic Environmental Assessment (May 2023) CBC
- Transport Modelling Study (June 2022) Stantec
- Whole Plan Policies and Community Infrastructure Levy Viability Study (March 2021) DixonSearle
- Viability Assessment Update (December 2022) DixonSearle
- Infrastructure Plan (July 2023) CBC

2.4.2 In addition, the following key Duty to Cooperate documents are relevant to this Topic Paper:

- Gatwick Diamond Local Strategic Statement (2016) Chilmark Consulting
- Northern West Sussex Statement of Common Ground (2023) CBC, HDC, MSDC, WSCC
- Northern West Sussex Housing Needs Statement of Common Ground (2023) CBC, HDC and MSDC
- Crawley Borough Council and Horsham District Council Statement of Common Ground (2023) CBC, HDC
- Crawley Borough Council and Mole Valley Statement of Common Ground (2021) CBC, MVDC
- Crawley Borough Council and Reigate and Banstead Borough Council Statement of Common Ground (2021) CBC, RBBC
- Worthing Borough Council and Crawley Borough Council Statement of Common Ground (2021) WBC, CBC
- Arun District Council and Crawley Borough Council Statement of Common Ground (2021) ADC, CBC
- Crawley Draft Duty to Cooperate Statement (2021) CBC

The council is working closely with Mid Sussex District Council to finalise a bilateral Statement of Common Ground. This will be published as soon as it is agreed.

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

3. Strategic Issues

3.1 Unmet Housing Needs

3.1.1 Crawley's submission Local Plan confirms a total housing need of 12,080 dwellings (based on 755 dwellings per annum) for the 16 year Plan period (2024-2040). This is based on the government's Standard Methodology for calculating housing need. Crawley's Housing Needs are set out in more detail in Topic Paper 3.

3.1.2 The borough's land supply allows for 42% of this need to be met on sites within the borough's administrative boundaries: a minimum totalling 5,030 dwellings (set out in draft Policy H1). The reasons for this are set out in Topic Paper 4: Housing Supply. This equates to an annualised average of 314 dwellings per annum (dpa). However, higher delivery rates are anticipated in the early- to mid-Plan period, with lower

levels towards the end (due to the build out of the last remaining large sites available within the borough). A stepped trajectory is reflected in the Policy to account for this:

- Years 1-5 (2024-29): 400dpa
- Years 6-10 (2029-34): 360dpa
- Years 11-16 (2034-40): 205dpa.

3.1.3 The council is working hard to maximise capacity within the borough's boundaries. Through the Local Plan review, new approaches to achieve this are proposed. This includes the introduction of high density targets for the Town Centre and accessible locations (Policy CL4). Furthermore, the draft Local Plan now includes a series of housing typology policies to positively influence development opportunities within the borough (Policies H3, and H3a-H3f). This is further explained in Topic Paper 4.

3.1.4 After this supply is deducted from the identified housing need[10], there will be a remaining unmet housing need of approximately 7,050 dwellings arising from Crawley over the Plan period. This will occur as follows:

- Years 1-5 (2024-29): 355dpa
- Years 6-10 (2029-34): 395dpa
- Years 11-16 (2034-40): 550dpa

3.1.5 Through the signed Statement of Common Ground for the Northern West Sussex (NWS) Authorities and the Northern West Sussex Housing Needs Statement of Common Ground (both July 2023)[11], the parties agreed that housing need is a relevant strategic matter. In particular, it is agreed that it is critical to continue to work positively together to seek to address the housing needs of the Housing Market Area (HMA). Therefore, it is anticipated that Crawley's unmet housing need will be accommodated within the NWS HMA, insofar as is consistent with national policy and delivery of sustainable development. This will need to be demonstrated through the evidence for the respective Local Plans.

3.1.6 The adopted Local Plans for Horsham and Mid Sussex sought to provide an additional 2,548 dwellings[12] above the objectively assessed housing needs evidenced at the time, over the period from 2024 to 2031. This has been acknowledged, through the Local Plans' Examinations, to be predominantly in order to meet Crawley's unmet needs[13].

3.1.7 However, it is acknowledged that the Standard Method has increased the objectively assessed housing need for the other authority areas within the HMA. Therefore, the final outcomes of meeting the full housing need of the HMA will need to be established through the reviews of each of the Local Plans independently.

[10] 12,080 – 5,030 = 7,050 dwellings
[11] Northern West Sussex Statement of Common Ground (May 2020) CBC, HDC, MSDC, WSCC: https://crawley.gov.uk/sites/default/files/2020-06/NWS%20SoCG%20May%202020%20final%20signed.pdf
[12] 150dpa x 7 = 1,050 (Horsham District Planning Framework) + 1,498 dwellings (Mid Sussex District Plan, Policy DP4)
[13] Paragraphs 40-43, Report on the Examination into Horsham District Planning Framework, Geoff Salter (2015): HDPF-Inspectors-Report.pdf (horsham.gov.uk) and Paragraphs 21-28, Report on the Examination of the Mid Sussex District Plan 2014-2031, Jonathan Bore (2018): The Planning Inspectorate - Report to Mid Sussex District Council March 2018

Table 3: NWS HMA Standard Method and Local Plan Status

LPA	Local Housing Need – dpa[14]	Local Plan target (annualised average – dpa)	Plan status	Plan period
Crawley	755	314	Regulation 19 Proposed Submission	2024 – 2040
Horsham	911	tbc	Anticipated Regulation 19: tbc	Unknown
Mid Sussex	1,090	1,136	Regulation 18	2021 – 2039
NWS HMA	2,756	tbc (combined LP targets)		
Surplus/Deficit	tbc	tbc		

3.1.8 Since the adoption of the Local Plan, ongoing work has continued in relation to exploring potential urban extensions and developments adjacent to Crawley's borough boundaries.

3.1.9 Developments have been permitted (and commenced/completed) at:

- Pease Pottage (600 dwellings) immediately to the south of Crawley, in the High Weald Area of Outstanding Natural Beauty;
- Copthorne (500 dwellings) immediately to the east of Crawley; and
- along the Rusper Road to the west of Crawley (95 dwellings and 36 dwellings).

3.1.10 Further development is being explored through the Horsham District Local Plan review process. This includes Homes England's promotion of proposals for strategic scale development to the West of Crawley of 3,000+, and up to 10,000, new dwellings. This would potentially be provided in the form of three new neighbourhoods to Crawley over the longer term (beyond the current review Plan periods).

3.1.11 The draft Mid Sussex District Plan Review (Regulation 18) was published for public consultation between November and December 2022. This proposed a strategic allocation on Crawley's eastern boundary at Crabbet Park for approximately 2,300 new dwellings (1,500 within the Plan period) as part of a new sustainable community.

3.1.12 Crawley Borough Council is working closely and continually with Horsham District Council and Mid Sussex District Council, and alongside West Sussex County Council, to understand the implications and opportunities of these strategic proposals "at Crawley". Should these sites be progressed, whilst the main built development would be outside of the borough's administrative boundaries (and within Horsham and Mid Sussex districts respectively), infrastructure connections would be into the borough. This means there would likely be significant visual and environmental impacts on Crawley, as well as a major uplift in demands on local services and facilities so that substantial infrastructure investment would be needed and significant additional resources for service provision.

3.1.13 The draft Local Plan paragraphs 12.17 – 12.23 acknowledge that well planned urban extensions could form an important way to meet Crawley's unmet housing needs,

[14] The Standard Method for calculating Local Housing Need has been used.

with paragraph 12.23 setting out specific criteria which will be used to inform discussions with neighbouring authorities.

Meeting the needs of Specific Groups in the Community

3.1.14 In addition to the overall unmet housing needs amount, the 2019 Strategic Housing Market Assessment (SHMA) has considered the needs of specific communities within the borough. This has included:

- Those who require affordable housing
- Families with children
- Older people
- Students
- People with disabilities
- People who rent their homes and
- People wishing to commission or build their own homes.

3.1.15 As set out in Topic Paper 3, due to the land constrained position of the borough, some of the housing needs of the above groups will not be met in full. These require further discussions as part of the Duty to Cooperate, as set out below.

Affordable Housing

3.1.16 With particular reference to affordable housing, the SHMA has highlighted a net need for 739 affordable homes per year in Crawley. Out of this overall affordable housing need, 563 dwellings per year are needed as rented affordable housing. As Crawley is only able to meet approximately 42% of its overall housing needs within the borough, even if meeting a full 40% affordable housing policy requirement, there will be a significant shortfall of affordable housing. Furthermore, as set out in Topic Paper 3, viability challenges for higher density development in particular mean that only 25% affordable housing can be required for those residential developments within the Town Centre.

3.1.17 Therefore, where development is coming forward outside the borough on Crawley's boundary, discussions have been taking place to explore and agree mechanisms for Crawley's affordable housing needs to similarly be met. This includes through nomination rights being extended to residents on Crawley's housing register; particularly, but not restricted to, where housing needs are being met by developments on Crawley's boundaries. This has been successful for developments currently under construction: Kilnwood Vale – agreement with Horsham District Council in place; and Pease Pottage – agreement with Mid Sussex District Council in place.

Self and Custom Build Homes

3.1.18 The SHMA also highlighted the need for Duty to Cooperate discussions to explore opportunities to meet needs of those who wish to Self- or Custom-Build their own home. As a planned, urban New Town, the potential for meeting the level of development needed is limited within Crawley borough. Also, the high density nature of the majority of Crawley's anticipated delivery, particularly in the Town Centre, is not often appropriate for Self- or Custom-Builders.

3.1.19 The emerging Crawley Borough Local Plan proposes a draft policy approach to seek to meet some of this need within the borough. However, it is acknowledged that land

supply is limited for this purpose on any significant scale. The SHMA recognised that opportunities for securing self- and custom-build plots on strategic sites within Crawley is more limited than in Horsham district. Therefore, discussions have been progressed to understand whether there are opportunities for this to be considered over a wider area. This is particularly if there are duplicate entries on the Self-Build Registers across districts and boroughs.

Gypsy, Traveller and Travelling Showpeople

3.1.20 Notwithstanding the constrained land supply in Crawley, Duty to Cooperate agreements with the Gatwick Diamond Local Authorities confirmed the intention for each authority to seek to meet its own Gypsy, Traveller and Travelling Showpeople accommodation needs. Crawley supports, through financial contributions, the provision of a transit site for use across West Sussex authorities, which has been successfully established and is located in Chichester District.

3.1.21 As set out in the draft 2023 Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, there is not an identified immediate need for new pitch or plot sites within the borough. However, the update of this Needs Assessment is continuing, with an emerging draft published for consultation alongside the Local Plan and further updated for submission. Once finalised, this will confirm whether this remains to be the case. In addition, it is acknowledged that there may be a need arising over the Plan period from the existing families within the borough as new households are formed. On this basis, the reserve site allocated in the adopted Local Plan at Broadfield Kennels for up to 10 permanent residential pitch sites for Gypsy and Traveller use continues to be allocated for this purpose, should the need arise in the future.

3.1.22 There is no currently identified unmet need for Gypsies, Travellers or Travelling Showpeople arising from Crawley.

3.2 Unmet Employment Needs

3.2.1 In addition to the unmet housing needs, cooperation is carried out in relation to planning for economic growth across Northern West Sussex. This includes through the joint commissioning of the recent Economic Growth Assessment (EGA) 2020, with neighbouring authorities, and liaison with HDC on progressing the Crawley-focused updates (2021 and 2023). The EGA highlighted continued significant anticipated levels of economic growth in the Functional Economic Market Area. Much of the identified growth is associated with the economic strength of Crawley and Gatwick.

3.2.2 As identified through the Crawley Focused EGA Update (January 2023), there is need for a minimum of 26.2ha new business land in the borough for the period to 2040. This need is significantly within the industrial sectors (22.9ha), with office and research and development needs accounting for 3.3ha of the total. Crawley's Employment Land Trajectory (March 2023) identifies an available employment land supply pipeline of 14.49ha, which comprises 5.32ha office land and 9.17ha industrial land. This supply is sufficient to meet Crawley's quantitative office needs in full. However, there is only sufficient land to meet industrial needs in the early part of the Plan period. This results in a shortfall of 13.73ha industrial land, principally within the B8 storage & distribution sectors.

3.2.3 To meet Crawley's outstanding employment needs in full, an industrial-led Strategic Employment Location is allocated at Land East of Balcombe Road and South of the M23 Spur. This is the site referred to in the draft Local Plan as Gatwick Green. With this allocation, there are no remaining unmet employment needs arising from Crawley.

3.3 Unmet Education Needs

3.3.1 Crawley has a recognised unmet need for secondary education. This is identified as amounting to 4-6 forms of entry with two further forms of entry being provided permanently by existing schools in the borough.

3.3.2 This is in addition to the Gatwick Free School which received permanent planning permission in December 2022. It is a combined primary and secondary school with a maximum of 1,020 pupils, 600 for secondary provision. A proportion of its pupils are from Horley in Surrey.

3.3.3 The further 4-6 forms of entry of demand for secondary school places is in the short and medium term and there have been capacity issues experienced since September 2021. In the longer term, numbers are expected to reduce as entry to primary schools is now falling after a rapid rise from 2012.

3.3.4 When the Crawley Borough Local Plan 2030 was adopted (December 2015), it was anticipated by WSCC that they would explore options for the extension of existing secondary schools within the borough. However, the Infrastructure Delivery Plan recognised that the need for places might be supplied by a new school. In 2017, the Department for Education (DfE) announced funding for a new six form entry plus a sixth form Secondary Free School within Crawley. This 'Forge Wood High' is to be sponsored by a high performing multi-academy trust.

3.3.5 However, given Crawley's constrained land supply, after extensive work by the council, WSCC, the DfE and LocatED, no suitable site has been found to build the school. Instead, the potential to provide additional secondary school places, to serve Crawley's needs, is being considered on sites close to Crawley. If new strategic development on Crawley's boundaries could provide this opportunity, the DfE will seek to bring forward a school as early as possible. In the meantime, WSCC has confirmed it will look to a combination of permanent and temporary expansions to cater for additional places.

3.3.6 In addition, notwithstanding the lack of a suitable site for a secondary school within Crawley, the submission draft Crawley Local Plan (2024-2040) Policy IN2 makes allowance for consideration of education provision on sites allocated for uses including housing, where justified by local need, in case suitable opportunities should arise.

3.4 Unmet Health Needs

3.4.1 There are recognised capacity constraints on GP provision across the area, particularly with the decision by the NHS not to bring forward new provision as originally planned within the Forge Wood and Kilnwood Vale new neighbourhoods. However, the introduction of Primary Care Networks (PCNs) including the "Improved Access Hub" is anticipated by the NHS West Sussex CCG to enhance capacity and improve resilience.

4. Conclusion

4.1 The updated total **unmet need**, calculated for the Local Plan Review, against the assessed needs for both housing and employment, arising from within Crawley over the Plan period (2024 – 2040) is:

- Housing: 7,050 dwellings;
- Affordable Housing: 9,812 dwellings;
- Self- and Custom- Build: Unknown;
- Gypsy, Traveller and Travelling Showpeople: None;
- Employment: None;
- Education: 4-6 forms of entry Secondary Education;
- Health: Unknown. Anticipated by the NHS to be addressed by the Primary Care Networks.

4.2 Duty to Cooperate discussions have continuously progressed since the adoption of the adopted Local Plan. This has included resolving unmet needs issues identified through the adopted Local Plan, as part of the adoption of the Mid Sussex District Plan (meeting the remaining unmet housing needs) and Reigate and Banstead Development Management Plan (meeting unmet employment needs through Horley Business Park allocation).

4.3 Throughout the production of the Local Plan Review further cross-boundary strategic discussions have been held in order to resolve the emerging unmet development and infrastructure needs. The details of these and the outcomes achieved so far are set out in the Crawley Local Plan Duty to Cooperate Statement 2040.

4.4 In particular, this has resulted in the Statement of Common Ground across the Northern West Sussex authorities: Crawley Borough Council, Horsham District Council, Mid Sussex District Council, and West Sussex County Council, and ongoing work on emerging bilateral Statements of Common Ground.

4.5 Furthermore, detailed and technical conversations have been ongoing in relation to the significant strategic scale development being promoted by Homes England to the West of Crawley with Crawley Borough Council as a key partner. Discussions are also taking place with Mid Sussex District Council with regard to the new neighbourhood, in the form of a sustainable community, at Crabbet Park, east of Crawley, identified for allocation in the Mid Sussex Regulation 18 District Plan (2021 – 2039).