

Topic Paper 5

Unmet Needs

for the Crawley Borough Local Plan 2015-2030

November 2014



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Crawley’s Objectively Assessed Unmet Needs: Housing and Employment

1. Introduction

- 1.1 This Topic Paper explains the supply-led approach to the allocation of development land necessary to meet objectively assessed development needs for housing and economic growth, established by the Local Plan in:
 - Policy EC1: Economic Growth
 - Policy H1: Housing Delivery
- 1.2 The National Planning Policy Framework confirms that the starting point for Local Plans is that they are prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development. Further the Plan should be deliverable within its plan period and based on effective joint working on cross-boundary strategic priorities¹.
- 1.3 This Topic Paper explores the extent of Crawley’s objectively assessed needs for housing and economic development and assesses opportunities available for meeting these needs. Table 1 below sets out the summary of assessed needs, those capable of being accommodated within Crawley’s administrative boundaries and the remaining level of unmet needs arising from Crawley’s projected growth. This table represents the council’s position of unmet needs at November 2014²; the detail of this is covered in the later sections of this Topic Paper.

Table 1: Summary of Objectively Assessed Needs

	Objectively Assessed Needs	Local Plan³ Provision	Unmet Needs
Housing	8,100 net dwellings	5,000 net dwellings	3,120 dwellings
Employment	minimum additional land of 77.2ha for business use	additional land of 42ha for business use (updated Employment Land Trajectory identifies a supply figure of 44ha)	33.2ha of land for business use (updated Employment Land Trajectory: 33.2ha)

- 1.4 The Duty to Cooperate Statement⁴ sets the wider context in which the Crawley Borough Council Local Plan⁵ has been prepared, in particular in relation to cross-boundary strategic issues including meeting housing and employment needs. This topic paper should be read in conjunction with the detail of the supply-led approach and objectively assessed development needs set out in:
 - Topic Paper 2: Housing Needs; Core Documents Library Reference: LP011

¹ National Planning Policy Framework (2012) paragraph 182, bullet points 1 and 3.

² These figures relate to the updated Housing Trajectory and proposed modifications for the Local Plan (November 2014) and the updated figures in the Employment Land Trajectory (November 2014) prepared to accompany the submission of the Local Plan.

³ Crawley Borough Local Plan 2015 – 2030 Submission Modifications Draft November 2014 (CBC November 2014)

⁴ Crawley Borough Local Plan Duty to Cooperate Statement (CBC, 2014) Core Documents Library Reference: LP006

⁵ Crawley Borough Submission Consultation Local Plan 2015 – 2030 (CBC, 2014) Core Documents Library Reference: LP001

- Topic Paper 3: Housing Supply; Core Documents Library Reference: LP012
- Topic Paper 4: Economic Growth; Core Documents Library Reference: LP013
- Topic Paper 6: Green Infrastructure; Core Documents Library Reference: LP015.

2. Housing

- 2.1 Crawley's housing market sits within the northern part of the Northern West Sussex Housing Market Area (HMA), which includes a small part of south east Surrey.

Strategic Housing Market Assessment

- 2.2 Crawley Borough Council, Horsham District Council and Mid Sussex District Council jointly commissioned consultants to prepare a Strategic Housing Market Assessment (SHMA) to cover the majority of the northern West Sussex HMA (excluding the small part of the HMA which extends into the southern administrative area of Reigate and Banstead – predominantly covering the Horley area, and the southern areas of Mole Valley and Tandridge districts).
- 2.3 The SHMA was prepared by GVA Grimley in 2009⁶, with a subsequent update undertaken in 2012⁷ and a further update commissioned in 2014⁸. The SHMA clarified the functional sub-regional housing market area, considered its characteristics, how key factors work together and assessed the probable scale of change in future housing need and demand, with the aim of understanding the operation of the housing market and future housing requirements across tenures. The findings of the 2012 and the 2014 updates are an addendum to the 2009 report, providing an up-to-date and justified estimate of future affordable housing requirements, based on the required level of market housing for each of the three Local Authority areas.

Crawley's Objectively Assessed Housing Needs

- 2.4 In 2011, Crawley commissioned NLP to establish the quantum of Crawley's anticipated Objectively Assessed Housing Needs. This established a series of scenarios relating to influences on Crawley's housing needs: demographic, economic and affordability, providing a range of housing needs figures from 120 dwellings per annum (static employment) to 664 dwellings per annum (short term past migration). The baseline, demographic 'natural change' scenario is the one which is considered to most closely align with the definition set out in the NPPF⁹ as the borough's Objectively Assessed Housing Need: identifying in 2011 an annual need figure of 542dpa.
- 2.5 Work undertaken to revise these figures to take into account more up-to-date population and household projections (2011 based) has been set out in Topic Paper 2: Housing Needs. This indicates an objectively assessed need of 535dpa. This figure will be updated once the final information relating to travel

⁶ Northern West Sussex Strategic Housing Market Assessment, Final Report March 2009 (GVA Grimley, 2009) Core Documents Library Reference: LP082a

⁷ Northern West Sussex – Crawley; Strategic Housing Market Assessment Update, October 2012 (GVA, 2012) Core Documents Library Reference: LP083b

⁸ Northern West Sussex Housing Market Area Affordable Housing Needs Model Update (Climark Consulting Ltd., October 2014) Core Documents Library Reference: LP082c

⁹ National Planning Policy Framework (2012) paragraph 159.

to work, DCLG Household Projections and employment growth anticipated to be published in late 2014.

Strategic Housing Land Availability Assessment

- 2.6 The amount of land available for future development in Crawley is limited by a number of significant factors. These include Crawley's tight administrative boundary, the implications of Gatwick Airport in relation to noise affected areas and land safeguarded for the possibility of a second runway, and the planned nature of the urban area, along with environmental constraints including nature conservation and flooding. Crawley's strong economic position as a key economic driver in the sub-region creates a significant demand for land to accommodate employment growth; whilst the need to meet open space requirements for the local population and protect other important green infrastructure places further pressure on the remaining available land for uses other than housing.
- 2.7 Ongoing work undertaken by Crawley Borough Council seeks to maximise the extent to which needs arising from Crawley can be accommodated within the borough's boundaries. This has included undertaking a substantial Urban Capacity Study revisiting every potential site within each of the town's neighbourhoods; removing all policy constraints and reassessing these in light of the competing need to provide land for development; undertaking additional public consultation, technical and viability studies on the potential of additional sites, and reassessing the potential for windfalls in light of the new Planning Practice Guidance. This work has ensured the total supply of land for housing within the borough has been increased by a capacity of 1,200 net dwellings: from 3,800 dwellings in the preferred strategy Crawley Local Plan (October 2012) to 5,000 dwellings in the submission Crawley Local Plan (Main Modification: MM025, November 2014).
- 2.8 The Strategic Housing Land Availability Assessment¹⁰ and Housing Trajectory¹¹ were updated in November 2014 to ensure the housing land supply position is accurately taken into account in the Local Plan. This identifies a housing land supply which provides a total of 5,350 net dwellings, of which 5,010 are anticipated to be delivered over the 15 year Plan period 2015–2030; the remainder to be completed in the earlier period leading up to the Plan's adoption. In addition, it is anticipated a further 825 dwellings (55dpa) can reasonably be expected to come forward as windfalls.
- 2.9 Over the 15 year Plan period it is therefore assumed an average housing figure of 334dpa can be expected to be delivered; representing approximately 60% of the total objectively assessed housing need.

Unmet Need

- 2.10 The Local Plan acknowledges there will be an unmet objectively assessed housing need over the Plan period. Based on the most up-to-date figures, the shortfall between the objectively assessed need and housing supply is anticipated to be 3,120 dwellings. As explained in the Duty to Cooperate Statement a substantial amount of work has been undertaken to ensure this position is fully understood by neighbouring authorities, and to consider how and where this shortfall can be met.

¹⁰ The Strategic Housing Land Availability Assessment (CBC, November 2014) Core Document Library Reference LP079

¹¹ The Housing Trajectory (CBC, 30 September 2014) Core Document Library Reference LP080

Northern West Sussex HMA Position Statement

- 2.11 Agreement¹² between Crawley Borough Council, Mid Sussex District Council and Horsham District Council seeks to meet needs across the wider housing market area, taking into account local constraints, local aspirations and the need for sustainable development. Having assessed the ability of its area to accommodate housing growth, each authority considers it is doing the maximum reasonable to meet the objectively assessed housing needs of the area as a whole. The proposed housing provision will be tested at each individual local authority's Local Plan Examination to ensure it is sound and reflects the maximum sustainable development considered achievable within each administrative area.
- 2.12 Table 2 below sets out the combined objectively assessed housing need across the housing market area against the anticipated delivery levels set out in the current draft Plans (as of 31 July 2014).

Table 2: Objectively Assessed Housing Needs and proposed housing provision (per annum) – Northern West Sussex Authorities

	Mid Sussex	Crawley	Horsham	TOTAL
Objectively Assessed Need	516dpa	535dpa	560dpa	1,611dpa
Proposed Housing Provision	530dpa*	326dpa	650dpa	1,506dpa

* This figure was prepared for the 2013 submission Mid Sussex District Plan. That Plan has now officially been withdrawn and work is currently being carried out on a new Strategic Housing Land Availability Assessment and Sustainability Appraisal of cross-boundary options emerging from duty to cooperate exercise on unmet needs. The final proposed housing provision figure for the Mid Sussex district is, therefore, subject to current revision.

- 2.13 This table illustrates there remains a housing need of up to 105dpa currently unmet by planned development across the main part of the Northern West Sussex housing market area. This is a total of approximately 1,575 dwellings in the period to 2030.
- 2.14 It is acknowledged that Crawley is one of a number of local authority areas within the South East which is unable to meet its full objectively assessed housing need, and there are continuing pressures on the other administrative areas within the northern West Sussex HMA to meet unmet needs from outside of the HMA. This includes need arising from the Coastal Sussex Authorities and Surrey Authorities. In the future this is also anticipated to be exacerbated by unmet needs arising from London.

Spatial Distribution of Planned Housing Development

Reigate and Banstead Core Strategy

- 2.15 It is acknowledged that part of the housing market area extends into the southern part of Reigate and Banstead. Through cooperative working between the two authorities constructive and effective outcomes have been achieved and the ability of Reigate and Banstead borough to accommodate some of the need arising from the Northern West Sussex HMA has been established through the Examinations into the Reigate and Banstead Core Strategy. The Inspector's report on the Examination into the Reigate and Banstead Core Strategy Local Plan confirms that the minimum planned

¹² Northern West Sussex Position Statement (Revised July 2014) Core Document Library Reference LP129

housing delivery figure set out in the Core Strategy (460dpa) would cater for the full need arising from the local population (330-370dpa) and allow for some continued in-migration (90-130dpa) from other parts of the housing market (and wider) area, “including some of the unmet need from Crawley Borough”¹³. The Inspector concluded that the full Objectively Assessed Housing Need for Reigate and Banstead borough is around 600-640 dwellings per annum.

- 2.16 Accordingly, this acknowledgement has been included in the supporting text within the Reigate and Banstead Core Strategy, confirming:
“... *There is considerable pressure for housing across the South East, including in Surrey and the Gatwick Diamond area... This amount of housing recognises the need to provide homes for local people and to support economic growth. It provides for internally-generated natural change and some continuing net in-migration to the borough which would contribute towards meeting unmet need of other local authorities including those within the wider East Surrey and North West Sussex HMA...*”¹⁴
- 2.17 Whilst this figure does not meet in full the unmet needs arising from the Northern West Sussex HMA it further reduces the shortfall, perhaps to approximately 55dpa (105 dwelling per annum shortfall, as set out in paragraph 2.13 above, minus up to 50 dwellings per annum being met as part of the in-migration allowance in Reigate and Banstead’s housing target). It is, however, acknowledged that only a limited number of historic movements into Reigate and Banstead have been from Crawley (the 2011 census origin-destination statistics indicated that 4% of those who moved in to Reigate and Banstead between 2010 and 2011 were from Crawley; 7% from the northern West Sussex Housing Market Area as a whole; compared with 20% from East Surrey Housing Market Area).

Crawley Urban Extensions

- 2.18 The need for urban extensions and the presence of strategic housing delivery in the form of new neighbourhoods in and around Crawley is not a new concept, and is an appropriate way to meet the needs of the emerging households from within the existing population. The first phase of Crawley’s fourteenth neighbourhood, Forge Wood, to the north east of the existing built-up area has been granted reserved matters approval and work on site has just started. Joint working has been long established in assessing opportunities for the delivery of homes in new neighbourhoods in close proximity to Crawley.
- 2.19 In most recent times, this has included the Joint Area Action Plan prepared and adopted by Crawley Borough and Horsham District Councils in 2009 for West of Bewbush, after the identification of a Strategic Development Location to the West and North West of Crawley for 2,500 homes was originally set out in the West Sussex Structure Plan. West of Bewbush (now known as Kilnwood Vale) was subsequently determined as the most sustainable and appropriate location to take forward following detailed assessments of the opportunities and constraints for providing a new neighbourhood and appraisal of strategic development potential around all of Crawley’s

¹³ Report to Reigate and Banstead Borough Council: Report on the Examination into Reigate & Banstead Core Strategy Local Plan, Martin Pike BA MA MRTPI (31 January 2014), paragraph 67.

¹⁴ Reigate and Banstead Core Strategy (2014) paragraph 7.4.3 (Report to Reigate and Banstead Borough Council: Report on the Examination into Reigate & Banstead Core Strategy Local Plan, Martin Pike BA MA MRTPI (31 January 2014), Main Modification: MM22)

boundaries undertaken by the “At Crawley” study (2009)¹⁵. The Kilnwood Vale neighbourhood is currently under construction, immediately adjacent to Crawley’s administrative and urban boundary whilst being located wholly within Horsham District. The strong connection with Crawley, and the positive nature of the joint working has resulted in 50% of the affordable housing nomination rights being allocated to Crawley’s housing waiting list.

- 2.20 Crawley’s emerging Local Plan confirms that opportunities for urban extensions immediately adjoining Crawley’s borough boundaries, to the east and/or west¹⁶, will continue to be explored through joint working with Crawley’s neighbouring authorities. If a decision is made to locate additional runway capacity elsewhere in the country and Gatwick Airport safeguarding for a second runway is lifted, opportunities to the north of Langley Green and Forge Wood will also be fully assessed for appropriate housing provision although these are limited by noise constraints arising from the existing runway.
- 2.21 Further strategic development potential within the wider HMA has been explored through studies including the New Market Town Study (2010) and West Sussex Bio City Pre-Feasibility Study (2010). This has more recently been explored by the northern West Sussex joint SHLAA Appendix: Strategic Sites and Broad Locations across the Housing Market Area (July 2014). Work is ongoing with both Horsham and Mid Sussex District Councils in relation to this, and in particular, as part of the Mid Sussex review of the sites within their district leading up to the pre-submission consultation on the Mid Sussex District Plan.

Committed and Planned Strategic Housing Developments

- 2.22 A significant quantity of housing is committed or planned in close proximity to Crawley borough’s borders or on local transport links. Whilst these dwellings do not technically count towards Crawley’s housing delivery, they do form part of the overall contribution towards meeting the needs of local housing market areas as a whole and are likely to provide housing opportunities for Crawley residents who are unable to access homes within Crawley’s administrative boundaries, in sustainable commuting distance from the town to enable continued access to the employment offer. These key strategic locations are set out in Table 3 below.

Table 3: Committed and Planned Strategic Housing Developments in close proximity to Crawley

Development	District	Total Housing Proposed	Status
Kilnwood Vale	Horsham	2,500 dwellings	Outline permission granted. Phase 1 permission for 291 homes granted. Construction started and some homes occupied. The expected housing delivery trajectory anticipates delivery of homes in the new neighbourhood to be completed by 2025/26. 50% affordable housing nomination rights allocated for Crawley’s waiting list.

¹⁵ At Crawley Study 2009, Final Report October 2009 (GL Hearn, 2009) Core Documents Library Reference LP087

¹⁶ Paragraphs 2.26, 6.21 and 6.41 of the Submission Local Plan (CBC, September 2014) Core Documents Library Reference LP001

Development	District	Total Housing Proposed	Status
Horley North West	Reigate and Banstead	1,570 dwellings	Allocated in Core Strategy. Timeframe for delivery by 2027.
Horley Urban Area	Reigate and Banstead	930 dwellings	Allocated in Core Strategy. Timeframe for delivery by 2027.
Horley Sustainable Urban Extensions	Reigate and Banstead	Up to 200 dwellings	Allocated in Core Strategy. Timeframe for delivery by 2027.
West Horsham	Horsham	2,000 dwellings	Allocated in Core Strategy. Planning Permitted Granted. Construction Started.
North Horsham	Horsham	2,500 dwellings	Allocated in submitted Horsham District Planning Framework.
Southwater	Horsham	500 dwellings	Allocated in submitted Horsham District Planning Framework. Current planning application under consideration for 634 dwellings.
Pease Pottage	Mid Sussex	51 dwellings	Planning Permission Granted on Appeal.
West of Cophorne	Mid Sussex	500 dwellings	Planning Permission Granted.
Pease Pottage	Mid Sussex	95 dwellings	Planning Permission Granted on Appeal.
Rusper Road	Horsham	36 dwellings	Outline Permission Granted; Reserved Matters application submitted.
Total:		10,882 dwellings	

2.23 Whilst these dwellings will count towards the housing figures for the Local Authority area in which they are located and not form part of Crawley's housing figure, Table 3 clearly illustrates a substantial quantity of known housing delivery very close to Crawley. In practice, this may contribute towards meeting the needs of some Crawley residents either unable to access housing within the borough or those wishing to move out of the town due to lifecycle choices, potentially releasing existing accommodation within the town for new households.

Speculative Development Proposals

2.24 In terms of addressing longer term needs, there are a number of additional strategic development proposals which are not currently committed. These are being promoted by developers and/or landowners and are at varying stages of progression. Table 4 highlights the main known strategic development proposals in close proximity to Crawley's borough boundaries.

Table 4: Speculative Development Proposals in close proximity to Crawley

Development	District	Total Housing Proposed	Status
West of Ifield	Horsham	2,500 dwellings	<p>Submission made by West of Ifield Consortium to Horsham District Planning Framework. The proposal is continuing to be promoted by the land owner consortium through the Horsham Local Plan process. Currently, it is not allocated in the submission Horsham District Planning Policy Framework.</p> <p>Horsham’s Sustainability Appraisal identified more sustainable sites to take forward at this time. This was on the grounds of infrastructure constraints (roads, education, sewage treatment), landscape impact and flooding.</p> <p>CBC highlighted remaining concerns regarding the lack of infrastructure capacity, increased traffic movement and the impact on the environment. Meetings are being held at County level with the Highways Authority and the transport consultants for the Consortium, to consider whether there are solutions sufficient to mitigate the transport impacts of further development on the western edge of Crawley.</p>
West of Kilnwood Vale	Horsham	750 dwellings	<p>Submission made by Crest Strategic Projects to Horsham District Planning Framework.</p> <p>The Horsham Sustainability Appraisal did not support the progression of this site in the Horsham District Planning Framework. This is primarily on the grounds of impact on landscape – with the proposed extension located in the narrowest part of the strategic gap between Faygate/Horsham and Crawley, and significantly altering the settlement pattern of Crawley by forming an extension with little relation to the wider pattern of the town. Anticipated impacts upon infrastructure (particularly transport) and biodiversity are also highlighted as negative.</p>
Crabbet Park	Mid Sussex	3,100 dwellings	<p>Masterplan submitted to Mid Sussex Council by RPS on behalf of Miller Homes to the Core Strategy Pre-submission document consultation February - March 2008; RPS/ Miller Homes continued to promote Crabbet Park as a location for strategic development at the Draft District Plan stage. Crabbet Park has not been actively pursued by the land owner developers since this stage of the Mid Sussex Local Plan. Representations were not received by Mid Sussex promoting the site at the submission Publication stage in advance of the council’s recent Examination.</p> <p>The Mid Sussex Sustainability Appraisal did not support the progression of this site in the Submission Draft District Plan. This position was taken primarily due to the substantial infrastructure constraints identified by the ‘At Crawley’ study (2009) in relation to transport and the capacity of the sewage treatment works, as well as negative economic impacts.</p> <p>Copthorne Neighbourhood Plan covers this area in</p>

Development	District	Total Housing Proposed	Status
			addition to the village of Copthorne. The current position of the emerging proposals for the Copthorne Neighbourhood Plan focuses development on sites located within the village urban boundary.
Mayfield Market Town	Mid Sussex/ Horsham	10,000 dwellings	Submission made by Mayfields to Horsham District Planning Framework and Mid Sussex 2013 Submission District Plan. The Horsham Sustainability Appraisal did not support the progression of this site in the Horsham District Planning Framework. This position was primarily taken due to the site's location being remote from all sustainable transport routes and all existing community facilities and services and other more sustainable options being more readily available. The Mid Sussex Sustainability Appraisal did not support the progression of this site in the 2013 Submission District Plan for similar reasons.
Old Brighton Road South, Pease Pottage	Mid Sussex	30 dwellings	Proposed Site for Housing Allocation in the draft Slaugham Neighbourhood Plan. The examiner concluded that the Slaugham Neighbourhood Plan should not proceed to a local referendum at that stage.
Land at Rusper Road, Ifield	Horsham	150 dwellings	Submission made to Horsham District Planning Framework from Gladman Developments Ltd. and pre-application discussions, including EIA screening request. This site is considered to be constrained by the same infrastructure capacity concerns as the West of Ifield proposal. Without being a strategic sized development it would be even more difficult to fund mitigation. This site is not closely related to the urban area and would instead form inappropriate level of development on the rural/urban fringe outside the Built Up Area Boundary.

2.25 The sites identified in Tables 3 and 4 are illustrated in Appendix A.

Moving Forward

2.26 Table 4 above indicates the constraints identified in bringing forward further strategic development in close proximity to Crawley. These issues will need to be resolved to open up opportunities for any such development to progress.

2.27 Joint working with the other two northern West Sussex Authorities (Mid Sussex and Horsham District Councils) has primarily focused on a dispersal approach to housing delivery across the Housing Market Area, allowing for sustainability appraisals to be carried out within each local authority area and ensure development is truly sustainable.

2.28 More recent work has involved joint considerations of strategic sites and broad locations across the whole of the Housing Market Area, and not just the 'At Crawley' sites or the 'market town' offer. Part of this work has included seeking up-to-date information on capacity from Infrastructure Providers for the remaining 'At Crawley' sites in addition to the growth predicted through

the three authorities' emerging Local Plans¹⁷ in order to update the information established by the 'At Crawley' study (2009). This has ensured a greater balanced approach to assessment of constraints and opportunities and will form a jointly agreed appendix for each authority's Strategic Housing Land Availability Assessment.

- 2.29 Whilst the location of the Mayfields proposal for a new market town is not considered to be sustainable, a new settlement option could prove an appropriate way to deliver a substantial amount of additional housing with a lesser impact on residents in existing towns, beyond the current plan period.
- 2.30 The Coast to Capital Local Enterprise Partnership Strategic Economic Plan (SEP)¹⁸ offers a commitment to the delivery of strategic infrastructure to support potential strategic housing locations. Crawley Borough Council's representation to the draft SEP highlighted the need for longer term infrastructure improvements to enable a greater commitment to the delivery of some of the potential strategic housing locations. Furthermore, advice has been sought from the key infrastructure providers with regards to the current and anticipated future capacity to support extensions to Crawley beyond the two planned new neighbourhoods (Kilnwood Vale and Forge Wood) and recent permission at west of Copthorne.

Affordable Housing

- 2.31 The NPPF states that all housing needs, including affordable, should be being met across a housing market area¹⁹. The Strategic Housing Market Assessment (SHMA) has identified a substantial affordable housing need for Crawley. Crawley's finite land supply leads to implications for the ability to meet these needs. Due to viability constraints it is not possible to exceed 40% affordable housing requirement from new residential developments within the borough. The NLP Locally Generated Housing Needs Assessment translated the SHMA needs assessment into an identified overall housing delivery figure of between 510 – 630 dwellings per annum to meet affordable housing of 204 – 254 dwellings at a rate of 40%.
- 2.32 Crawley's supply-led figure is approximately half this rate, which would consequently result in only half of affordable housing needs being met. Whilst those in need of market housing will have opportunities to purchase properties elsewhere in the housing market area/sub-region (affordability permitting), this is not necessarily an option for those Crawley residents currently on the Crawley Housing Waiting List, particularly as neighbouring Local Authorities bring forward 'local connections' criteria.

¹⁷ CBC Infrastructure Position Statements and 'At Crawley' sites infrastructure updates:

- CBC letter, 4 August 2014;
- Highways Agency, email 5 September 2014;
- Southern Water, email 15 September 2014;
- Sussex Police, letter 28 August 2014;
- Network Rail, Position Statement 5 August 2014;
- Gatwick Airport, letter 23 September 2014
- Environment Agency, letter 9 September 2014;
- Thames Water Utilities Ltd., letter 5 September 2014
- West Sussex County Council Local Education Authority, Position Statement September 2014;
- West Sussex County Council Waste and Recycling, Position Statement August 2014;
- NHS 5 Communities Executive Summary 2014/15: consultation Plan for Crawley, Horsham and Mid Sussex CCGs.

¹⁸ Coast to Capital Strategic Economic Plan (2014), Chapter 8 (page 161) Core Documents Library Reference: LP046

¹⁹ National Planning Policy Framework, Para. 47 bullet 1 (DCLG, 2012)

- 2.33 Agreements, such as that between Crawley and Horsham councils in relation to sharing nomination rights for Kilnwood Vale, should be considered further and pursued as part of Duty to Cooperate negotiations for developments adjacent to Crawley, including the schemes referred to in paragraphs 2.17 – 2.24 above.

3. Employment

- 3.1 Crawley is the largest economic hub in the northern West Sussex sub-region and also the largest economic area within the Gatwick Diamond. Manor Royal, the Town Centre and Gatwick Airport combine to provide a strong economic base and projected forecasts indicate that Crawley's economy will grow significantly during the Local Plan period.

Coast to Capital Local Enterprise Partnership Strategic Economic Plan (2014)

- 3.2 This document identifies Crawley as the 'Heart of the Gatwick Diamond', including Crawley, Manor Royal and the north of Horsham allocation. It also highlights the area as one of its key spatial priority locations for growth.

Gatwick Diamond Local Strategic Statement

- 3.3 The Gatwick Diamond Local Strategic Statement recognises Crawley's strength as a business location and confirms that, due to the concentration of demand, it is expected to be the main focus for future economic development, at least in the short and medium term.

Economic Growth Assessment (2014)

- 3.4 An Economic Growth Assessment (EGA) was jointly commissioned by Crawley Borough Council, Horsham District Council and Mid Sussex District Council. The EGA refreshes and updates the technical information provided in the previous Employment Land Review (ELR) from 2009 which also covered the three administrative areas of northern West Sussex. Through building upon the ELR, the EGA also enables consideration of planning policy for economic growth in line with requirements of the NPPF. It recognises Crawley as the largest workplace economy in the north West Sussex sub-region with 1.2million square metres of B1/B2/B8 space. Its largest sectors are in transport, administration support, business services and retail. With such high value sectors the average GVA per worker in Crawley is higher than other Sussex and south coast authorities.
- 3.5 The EGA primarily focuses on identifying a land supply position for business growth over the Plan period to 2030 and, using Experian data, the EGA models three key scenarios: 'baseline', 'policy-on' and 'potential sites'. As business development is recognised as a key barometer of economic need the EGA land requirement figure covers only the B Class uses, converting identified business job growth into a formal land take. Other employment uses beyond the B Classes vary more significantly in terms of range, employment density and operational requirements; job creation within the wider category of economic development cannot, therefore, readily be factored into a formal land take.

Crawley's Objectively Assessed Economic Needs

- 3.6 Even at the baseline level, the EGA forecasts significant growth across the Gatwick Diamond; far greater than growth levels previously identified in the ELR, particularly due to recession resilience and recovery. For Crawley, the baseline scenario identifies demand for a minimum of 16,440 jobs over the Plan

period to 2030. Of this figure, a total of 5,800 new jobs are forecast to come forward within the business (B Class) sector.

- 3.7 In spatial terms, identified job growth for business uses alone creates a need for a minimum of 77.2 hectares additional employment land take for B Class uses.

Employment Land Supply

- 3.8 The limited land supply and constrained nature of the borough affects the opportunities for identifying new land for employment development in a similar way to that referred to in paragraph 2.6 above in relation to new housing development. Given the scarcity of available land within the borough, the emerging Local Plan approach is to direct economic growth to the borough's existing main employment areas, and to the northern part of the borough. There is an identified available land supply of 44ha²⁰, comprising existing development commitments and land intensification opportunities, which will meet business growth needs in the earlier part of the Plan period. Additional land would be available if airport safeguarding were to be lifted following a government decision on the location of new runway capacity. The majority of this land is too noisy for residential development at present and in an existing single runway scenario but could accommodate employment growth.
- 3.9 At present, however, even allowing for the intensification and retention of land and buildings for business use within the Main Employment Areas, there remains an outstanding need for at least a further 33ha of land just to meet the baseline demand of 77.2ha for business class uses.
- 3.10 Given that land supply constraints present challenges to delivering even the baseline growth scenario, it is not considered realistic to plan for the 'alternative higher growth' or 'alternative potential sites' scenarios. The EGA is clear that in planning to accommodate the baseline growth scenario, Crawley would be planning positively for growth as required by the NPPF. Further detail on these scenarios and underlying assumptions is provided in the council's Topic Paper 4: Economic Growth.

Unmet Need

- 3.11 The EGA outlines a quantitative (land supply) and qualitative (quality of overall business stock) case for a new Strategic Employment Location (SEL) in Crawley, ideally north of Manor Royal, to complement Manor Royal and help meet the demand for business growth. However, availability of land for future strategic employment provision is currently constrained by airport safeguarding for a potential second runway, so a focused assessment of options will be undertaken once the decision has been made on UK airport expansion at a national level. However, the Employment Land Trajectory (November 2014) does consider potential sites promoted as part of the Local Plan process. In order to promote Crawley's key role as the economic focus of the sub-region the following sequential approach will be followed to identify appropriate locations:
- i. Land within Crawley, in the north of the borough;
 - ii. Land at Crawley/Gatwick, in the areas immediately adjoining the borough;
 - iii. Land near Crawley/Gatwick, within the wider Gatwick Diamond.

²⁰ Employment Land Trajectory (CBC, November 2014) Core Documents Library Reference: LP064
Crawley Borough Council Local Plan 2015 – 2030
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3.12 Neighbouring authorities are also pursuing positive Economic Growth proposals. The planned 'strategic' locations are set out in Table 5 below. The sites referred to in the table below, count towards meeting the needs arising from the authorities in which they are located, and do not form part of Crawley's employment land figure. In practice, they contribute to the wider economic growth aspirations of the Gatwick Diamond, and could potentially offer some further long term solutions through further assessment in relation to meeting strategic needs, should Crawley continue to remain constrained beyond the first 5 years of the Plan period.

Table 5: Planned Strategic Employment Developments 'At' Crawley or within neighbouring authorities

Development	District	Proposal/ Economic Floorspace Proposed	Status
Existing Employment Locations	Reigate & Banstead	46,000sqm (Horley – reuse and intensification of existing employment land: 24,000sqm)	Core Strategy: this floorspace has been planned for to meet local needs arising in Reigate and Banstead. Further work is being prepared to scope possibilities for meeting strategic needs of growth falling outside of local demand, through additional employment development.
Burgess Hill	Mid Sussex	20 – 30ha of land as high quality business park	Draft District Plan and identified in Coast to Capital LEP Strategic Economic Plan.
North Horsham	Horsham	High quality business park with approximately 46,450sqm (500,000sqft) floorspace.	Allocated site in the submitted Horsham District Planning Framework and identified in Coast to Capital LEP Strategic Economic Plan.
West of Cophorne	Mid Sussex	Up to 15,500sqm Employment floorspace (B1c Light Industry/B8 Storage and Distribution)	Outline planning permission granted.

3.13 In addition, a number of speculative 'strategic' locations identified or being promoted are set out in Table 6 below.

Table 6: Speculative Strategic Employment Developments 'At' Crawley or within neighbouring authorities

Development	District	Proposal/ Economic Floorspace Proposed	Status
Gatwick Green	Crawley/ Reigate & Banstead	Phase one: 35ha providing a total of 109,500sqm: made up from 48,000sqm business space; 28,000sqm education & training; 14,000sqm conference, exhibition & hotel provision; 12,500sqm innovation space; and 7,000sqm health & wellbeing. A further 'future phase' is identified to the south.	Submission made by Gatwick Green Consortium to Crawley Local Plan. Currently within land safeguarded for a second runway.
Horley: junction 9 of M23 motorway (identified as a	Reigate & Banstead	30ha strategic employment site and/or science park to south and east of Horley. 120,000sqm B1 floorspace;	Identified in Coast to Capital LEP draft Strategic Economic Plan.

Development	District	Proposal/ Economic Floorspace Proposed	Status
'future phase' within the Gatwick Green proposal)		creating 3,500 FTE jobs.	
Science Park (Burgess Hill)	Mid Sussex		Speculative/Brighton City Deal

3.14 The planned and potential economic development sites, identified in Tables 5 and 6, are illustrated in Appendix B.

4. Conclusion

- 4.1 The inter-relationship between housing and economic growth is recognised as critical: with the Coast to Capital LEP SEP stating that *“housing has a significant role in driving the composition of our future workforce – there is an intrinsic link between housing supply and labour market composition. Growth of affordable and entry-level housing can help replenish the local labour market, attracting and assisting to retain a younger workforce. Offering a choice and mix of higher-end properties can attract and retain an enterprising, high-skilled labour force”*²¹.
- 4.2 For Crawley, significant levels of predicted demographic growth, and, in particular, growth of the working-age population, alongside significant economic growth forecasts provide positive opportunities for the town and the wider Gatwick Diamond. These broadly balance, with evidence suggesting the population and associated housing need (approximately 527 dwellings per annum) trigger the creation of 399 jobs per annum, in line with the baseline level of job creation anticipated in the borough of 392²² business jobs per annum.
- 4.3 To ensure these opportunities are realised it is essential that growth is managed in a sustainable manner, with unmet needs being directed towards complementary locations within the sub-region, to ensure the benefits are not lost from the economy.
- 4.4 Crawley’s Local Plan confirms that, despite the constrained nature of the borough, approximately 60% of the objectively assessed housing needs and, at least, 55% of the objectively assessed economic needs over the period to 2030 will be accommodated within the borough boundaries. This will mean housing and economic growth will be broadly balanced, albeit that the total needs for both cannot be met. The majority of the shortfall can be captured within close proximity to Crawley’s boundaries through current planned development proposals. In addition, some of the identified future speculative development could come forward, particularly to meet the longer term needs arising from the growth of the town, should funding to improve currently constrained infrastructure be secured and following the decision on future runway capacity in the south east.
- 4.5 This would see a continuation of Crawley’s current role in the economy. 70% of working age people who live in Crawley also work in Crawley. Crawley, as a net importer of labour, experiences 46,300 in-commuters, exceeding the 15,000

²¹ Coast to Capital Strategic Economic Plan, page 162 (March 2014) Core Documents Library Reference: LP046

²² Figure of 392 arrived at by dividing total B Class Baseline jobs (5,880) equally across the 15 year Plan period.

residents who work outside of the borough²³. This represents approximately half of the total number of workforce jobs in the borough (94,200²⁴).

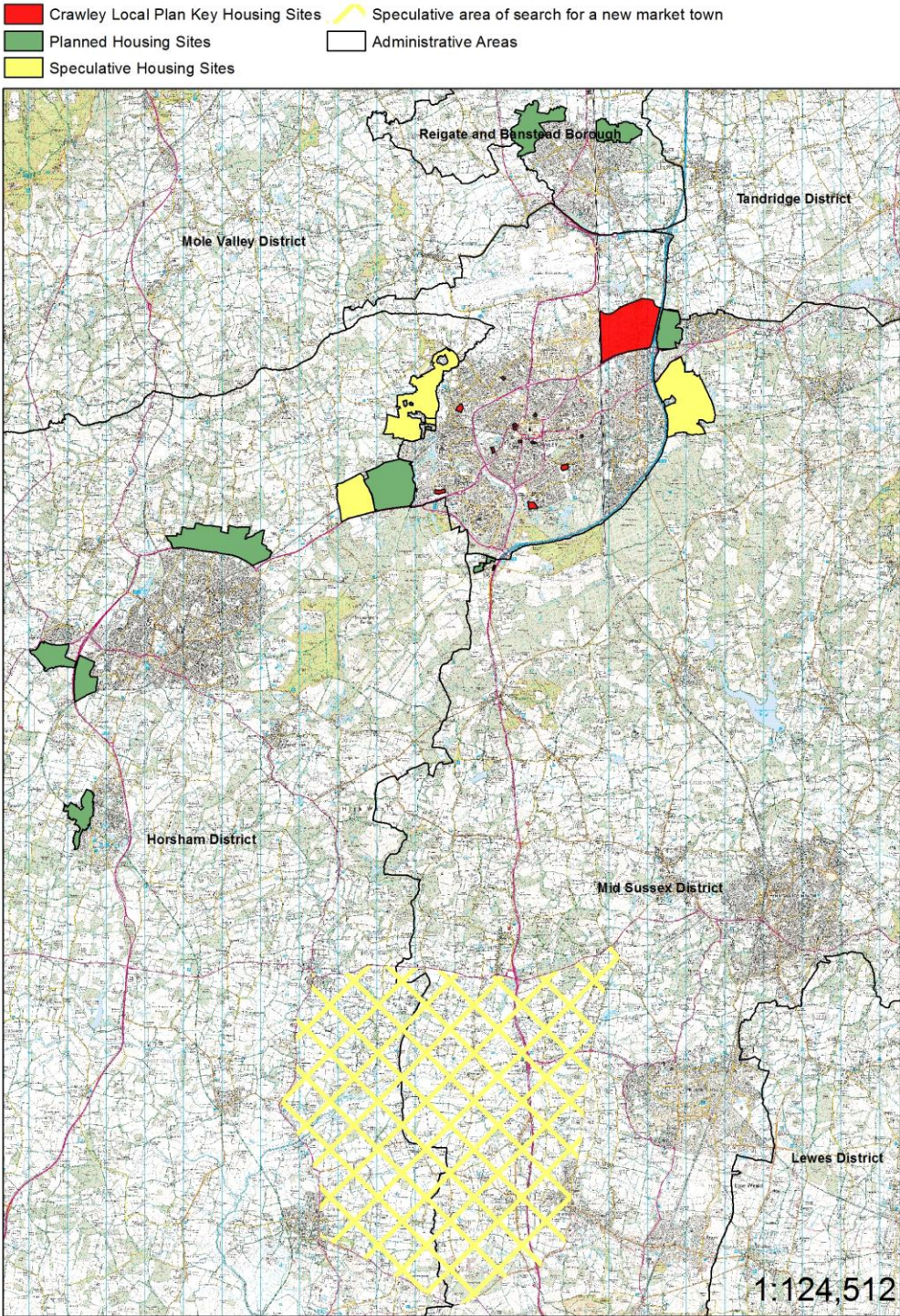
- 4.6 Following the decision on the proposed second runway at Gatwick, it has been acknowledged that a review of the evidence base and the Local Plan would be necessary (see Topic Paper 1 and paragraphs 1.38-1.43 of the submission Local Plan). This reflects the implications for both land availability and use as well as for the objectively assessed housing, employment, and infrastructure needs forecasts.

²³ Northern West Sussex Economic Growth Assessment: Crawley Emerging Findings Paper, para 2.2 (NLP, November 2013) Core Documents Library Reference: LP063

²⁴ Northern West Sussex Economic Growth Assessment, para. 3.4 (NLP, 2014) Core Documents Library Reference: LP062

APPENDIX A: STRATEGIC HOUSING PROPOSALS

Planned and Speculative Housing Sites across the Housing Market Area



APPENDIX B: STRATEGIC EMPLOYMENT PROPOSALS

Planned and Speculative Employment Development in the Gatwick Diamond

- Main Employment Area
- Gatwick Airport Boundary
- Manor Royal
- Planned Strategic Employment Locations
- Crawley Town Centre
- Speculative Strategic Employment Developments

