



Horsham
District
Council

Horsham District Local Plan Examination

Response to Action Point 4a

Matter 1, Issue 1 - Legal and Procedural Requirements – Whether the Council has complied with the duty to cooperate in the preparation of the Plan?

HDC29

December 2024

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Action Point 4a: Set out how far HDC's Draft Local Plan July 2021 would have gone towards meeting unmet housing need of NWS HMA authorities before Position Statement. Set out how this would be met. Append records of meetings where relevant.

Introduction

1. In July 2021 Cabinet endorsed a **draft Regulation 19 version of the Local Plan (SS02)**. Though it did not proceed to full Council and the publication period due to the subsequent publication of a revised National Planning Policy Framework and the receipt of the Natural England Position Statement. A note was requested to explain to what extent it would have gone to meeting unmet needs in the Northern West Sussex Housing Market Area (NWS HMA), the Council's primary HMA that it shares with Crawley Borough Council (CBC) and Mid Sussex District Council (MSDC).
2. This note does not describe all meetings and events that occurred relating to addressing needs within the NWS HMA from the start of plan preparation to the release of the Position Statement. Instead, it focuses upon the outcome of work with CBC and MSDC on this issue.

Previous Local Plan Plans

3. The **Horsham District Planning Framework (HDC05)** (HDPF) was adopted in November 2015. It set a housing target of 800 dwellings per annum (dpa). The **Inspector's Report (HDC06)** (paras 39-44) explains that 650 dpa was to meet needs of Horsham District, with the remainder (150dpa) being apportioned to meet about half of the unmet needs arising in Crawley Borough.
4. The Mid Sussex District Plan was adopted in March 2018. As set out in the **Northern West Sussex HMA SoCG 2024 (DC02)**, during the examination of the Mid Sussex District Plan Crawley's needs were reappraised, including to reflect that Crawley was ahead of its own Local Plan trajectory. Accordingly, Mid Sussex apportioned 88pa to meet the remainder of Crawley's unmet needs within its District Plan.

2020

5. The Council were aware through its discussions with CBC that unmet needs were likely to continue to arise in Crawley Borough. This was recognised in paragraphs 6.5-6.9 of the **Regulation 18 Consultation document (CD01)**, published in early 2020, where unmet needs in Crawley (as well as in the Sussex Coast, Surrey and south London Boroughs) were recognised. To this end, the Council had considered different housing requirements of between 1,000 – 1,400 dpa to fully meet its own housing needs and contribute to meeting needs arising in other authorities (with 1,600 and 1,800 additionally being tested in the **Sustainability Appraisal, SD03b**), with it being articulated that the needs of authority areas with closest links to Horsham would be prioritised in the first instance.
6. A response was received from CBC (see Appendix A for an excerpt) to the consultation. As is discussed in the response, it identified an unmet need of 5,925 over their (at that time) draft Regulation 19 Local Plan 2020-2035. Further calculations are provided which suggest that, should HDC continue to meet around half of CBC's needs this would equate to around 180.5 dwellings per year. CBC continue in their response by stating that *"it is anticipated this outstanding amount will be considered through the review of the Mid Sussex District Plan, such that Mid Sussex and Horsham would both contribute equally to meeting unmet needs arising from Crawley, as agreed in the current Local Plans."*

7. Following the consultation response, a SoCG was agreed between HDC, CBC, MSDC and West Sussex County Council in May 2020 (see Appendix B). Within it there was recognition that the needs in the HMA had previously been met by the respective HDC and MSDC Local Plans. The SoCG also set out the level of expected unmet needs arising from Crawley. At that stage, due to the position of HDC's Local Plan (Regulation 18 had been completed in March 2020 and decisions had yet to be made as to how the Plan would progress) and MSDC's District Plan Review (due to commence in 2021), it was not possible to state with certainty the extent to which HDC and MSDC could address future unmet needs, but it did outline that the *"authorities agree to continue to work positively together to seek to address the future housing needs of the Housing Market Area as far as possible, taking into account local constraints, and the need for sustainable development"*.

Unmet need of NWS at July 2021

8. As set out in a meeting note, in April 2021 HDC officers met with counterparts from MSDC (see Appendix C). The meeting included discussion of how unmet needs in the NWS HMA (and in other areas) could be addressed. With reference to NWS HMA, it was explained that HDC would likely seek to meet half of unmet needs in the forthcoming Regulation 19 Local Plan – in essence continuing with the existing arrangement from the previous set of Local Plans and responding positively to CBC's expectations as set out in their response to the HDC Regulation 18 Local Plan consultation.
9. MSDC advised that at that point, they had not yet reached a stage in which they could say that they could contribute to unmet needs as they had not undertaken necessary evidence to determine their position. However, they did explain that they did not foresee requesting assistance from other authorities (including HDC) to meet their needs and that they agreed (as set out in the 2020 NWS SoCG) that they would prioritise meeting unmet needs in the NWS HMA than other areas.
10. This position was then reflected in the **draft Regulation 19 version of the Local Plan (SS02)**. As is discussed in paragraph 6.5-6.11, the document identified that HDC would contribute 193dpa to addressing CBC's needs– understood to be approximately half of their unmet need at that time (CBC's figures had evolved).

Conclusion

11. HDC had continually sought to work with CBC and MSDC to address housing needs across the NWS HMA, continuing the arrangement that had been reflected in the HDPF 2015 and Mid Sussex District Plan 2018 whereby unmet needs arising in CBC were shared by HDC and MSDC.
12. The **draft Regulation 19 version of the Local Plan (SS02)** reflected this, setting out that HDC would apportion half of CBC's unmet needs within Horsham District, in line with CBC's expectations and thus setting out a clear basis for which MSDC could consider as part of the development of their District Plan review. Based on the information at that time, there was no reason to believe that needs across NWS HMA could not be accommodated in full.

Appendix

Appendix A: Crawley Borough Council consultation response to Wider Housing Need and the Duty to Co-operate section of the Regulation 18 Horsham District Local Plan 2019-2036 (March 2020)

Paragraph 6.5: CBC strongly support this paragraph, especially in the recognition of the Northern West Sussex Housing Market Area relationship and the importance of considering addressing meeting unmet needs of others.

Paragraph 6.6: CBC strongly support this paragraph. CBC confirms that effective cooperation has ensured that the current adopted Plans across the Northern West Sussex jointly meet the combined housing market area objectively assessed housing needs, as defined by the adopted Plans. This includes the 150dpa above Horsham's own housing need towards approximately half of Crawley's identified unmet needs.

	Mid Sussex (Plan Period: 2014 – 2031)	Crawley (Plan Period: 2015 – 2030)	Horsham (Plan Period: 2011 – 2031)	TOTAL
Annual Adopted Plan OAN	876dpa	675dpa	650dpa	2,201dpa
Full Adopted Plan OAN	14,892 dwellings	10,125 dwellings	13,000 dwellings	38,017 dwellings
Annual Adopted Plan Figure	876dpa (14/24) 1,090dpa (24/31) Ave: 964dpa	340dpa	800dpa	2,104dpa
Full Adopted Plan Figure	16,390 dwellings	5,100 dwellings	16,000 dwellings	37,490 dwellings

The table above shows that the Northern West Sussex Housing Market Area is close to meeting its own objectively assessed housing needs in full for the adopted Plan periods through the combined Plan requirements. Whilst against the annual Plan figure there is a shortfall of 97dpa, when this is considered over full anticipated delivery across the Plan periods it results in a total outstanding amount of 527 dwellings, which equates to 35dpa.

It was recognised through the Mid Sussex District Plan examination that this outstanding amount could be monitored against potential over-delivery in any of the three authority areas. As it is anticipated a shortfall would occur only in the latter part of the Plan period, this would be addressed through the District and Local Plan reviews. The table below shows how this is currently being anticipated as being addressed through planned over-delivery within Crawley's borough boundaries.

Dwellings		
	Local Plan Provision	Crawley AMR Provision
OAN for period 2015 – 2030	10,125	10,125
Crawley Local Plan 2015 – 2030	5,100	
Projected Provision in Crawley AMR 2015 – 2030		6,280
Contribution from Mid Sussex District Plan	1,498	1,498
Contribution from Horsham Planning Policy Framework	3,000	3,000
Totals	9,598	10,778
Shortfall/Surplus against OAN 2015 – 2030	-527	+653

Paragraph 6.7: Crawley’s submission Local Plan confirms that the government’s Standard Methodology for calculating housing need results in a total housing need for the 15 year plan period (2020-2035) of 11,280 dwellings (based on 752 dwellings per annum).

The draft Local Plan identifies the borough’s land supply allows for almost half of this to be met on sites within the borough’s administrative boundaries: a minimum totalling 5,355 dwellings (an increase of 549 dwellings since the Regulation 18 Local Plan (July 2019) due to additional sites and increased densities of existing sites following their reassessments). This equates to an annualised average of 357dpa.

However, a stepped trajectory is reflected in the Policy to account for the higher delivery in the early Plan period and the lower anticipated levels towards the end (due to the build out of the last remaining large sites available within the borough):

- Years 1-5 (2020-25): 500dpa
- Years 6-10 (2025-30): 450dpa
- Years 11-15 (2030-35): 121dpa

This leaves a total unmet need figure of 5,925 dwellings to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

Should HDC continue to meet ‘about half’ of Crawley’s unmet needs, this would result in a contribution of 2,677.5 dwellings over the period 2020 – 2035. Taking 150 dwellings from this for the period 2020/21 (i.e. before the Horsham Local Plan review is adopted) this would leave a total of **2,527.5 dwellings** over the remaining 14 year Plan period to 2035. This equates to

approximately **180.5 dwellings** per annum to be accommodated in Horsham to meet unmet needs arising from Crawley.

Assuming Mid Sussex continues to contribute 1,498 dwellings towards Crawley's unmet needs between 2024/25 – 2030/31, this would leave an outstanding unmet need arising from Crawley for **1,179.5 dwellings**.

It is anticipated this outstanding amount will be considered through the review of the Mid Sussex District Plan, such that Mid Sussex and Horsham would both contribute equally to meeting unmet needs arising from Crawley, as agreed in the current Local Plans. CBC requests that continued discussions regarding meeting housing needs are maintained across the Northern West Sussex Housing Market Area authorities to ensure this is effectively and proactively delivered where it continues to constitute sustainable development for the HMA.

The council is working hard to maximise capacity within the borough's boundaries, including by introducing extremely high density targets for the Town Centre and accessible locations (Policy CL5) and a series of housing typology policies to positively influence development opportunities within, and immediately beyond, the borough (Policies H3, and H3a-H3g). CBC consider that it would be beneficial to add additional wording to the paragraph and suggest the following minor amendments to the text:

“Crawley, **despite increasing housing delivery**, have identified that they will be unable to meet a significant proportion of their identified housing needs.....”

Furthermore, the wording in paragraph 6.8 is more positive and CBC suggest there should be an equivalent final sentence in paragraph 6.7, stating:

“Opportunities for helping to meet the unmet housing need arising from within the Northern West Sussex HMA will need to be considered.”

Paragraph 6.8: CBC acknowledge the importance of working across the sub-region, and particularly in relation to the overlaps of the housing market areas. In addition to the long-time involvement in joint working across the Gatwick Diamond and as part of the West Sussex Joint Planning Board, Crawley Borough Council joined the West Sussex and Greater Brighton Strategic Planning Board (which merged the West Sussex JPB with the Coastal West Sussex and Greater Brighton SBP) in January 2018 (having been an observing member since April 2017). It is anticipated the work on the Local Strategic Statement 3 which covers this area will provide the overarching longer term strategic context within which the Local Plans will be framed. This may include consideration of meeting the housing need of the overlapping housing market areas (Northern West Sussex, Brighton & Hove, Worthing, and Chichester & Bognor Regis).

However, through both the Horsham District Planning Framework (2015) and the Mid Sussex District Plan (2018) examinations, the planning inspectors' recognised the importance of meeting the needs of the Northern West Sussex Housing Market Area first:

In assessing the overlap between the NWS HMA and that of the coastal authorities to the south and London to the north, the Planning Inspector for the Horsham District Planning Framework remained unconvinced of any considerable degree of overlap¹.

¹ Report on the Examination into Horsham District Planning Framework, paragraphs 41 and 42 (8 October 2015) Geoff Salter

The Planning Inspector for the Mid Sussex District Plan provides a detailed summary of the most up-to-date position in relation to meeting the needs of the Housing Market Area, including Coastal West Sussex and Brighton, Surrey and London, and concluded that the first priority should be the unmet need in the same HMA as Mid Sussex².

Paragraph 6.9: CBC strongly supports the final sentence. However, the Horsham Local Plan should clearly define which authority areas have the closest links to Horsham (i.e. Crawley, and the smaller influence of the SE area and the coast).

Furthermore, consideration should also be given to where needs cannot be met elsewhere (i.e. coastal needs can be met along the coastal stretch and Surrey and London needs can be met by green belt reviews, unlike Crawley's needs which can only really be met within the Northern West Sussex Housing Market Area – this is an approach taken by the Inspector for the Mid Sussex District Plan examination.

² Report on the Examination of the Mid Sussex District Plan 2014-2031, paragraphs 21 – 28 (12 March 2018)
Jonathan Bore [Inspector's Report on the District Plan \(179kB PDF\)](#)

Northern West Sussex Statement of Common Ground: May 2020

1. List of Parties involved:

- Crawley Borough Council
- Horsham District Council
- Mid Sussex District Council
- West Sussex County Council

2. Signatories:



02.06.20

Crawley Borough Council
Councillor Peter Smith, Cabinet Member for Planning and Economic Development



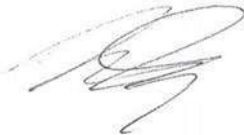
29.05.20

Horsham District Council
Councillor Claire Vickers, Cabinet Member for Living and Working Communities



28.05.20

Mid Sussex District Council
Councillor Andrew MacNaughton, Cabinet Member for Planning



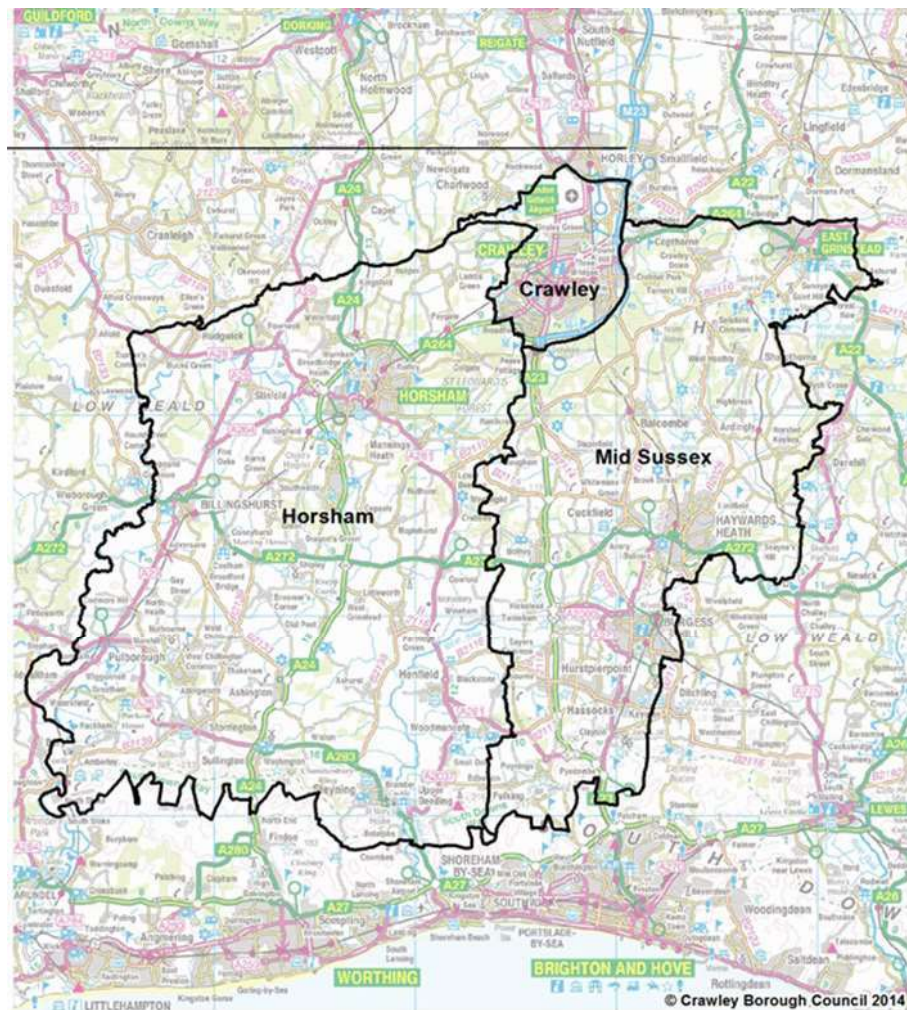
01.06.20

West Sussex County Council
Mike Elkington, Head of Planning Services

3. Strategic Geography

Crawley, Horsham and Mid Sussex are located within the county of West Sussex. Studies undertaken since 2009 have consistently confirmed the three district/borough authority areas form a close Housing Market Area (Northern West Sussex "NWS") and are part of wider Economic Functional Areas (Gatwick Diamond centred on Crawley/Gatwick Airport, and to the south of the Districts: Greater Brighton). The NWS authorities form part of the 'Coast to Capital' Local Enterprise Partnership, which stretches from

Chichester in the south west, along the coast to Brighton and Newhaven and Seaford through Mid Sussex and Crawley to Croydon on the outskirts of London.



Crawley Borough Council, Horsham District Council, Mid Sussex District Council (the Northern West Sussex Authorities) and West Sussex County Council have a long history of working together on issues of mutual importance and across a wide range of services. For example, the councils have mature shared service arrangements and routinely work together on procurement of goods and services. The three borough/district authorities share planning and administrative boundaries. There is a particularly strong history of joint working and collaboration on planning policy matters. Over the years a number of planning studies have been procured jointly and, when previous proposals at Crawley involved development beyond the borough boundary, a joint area action plan between Horsham and Crawley was produced and jointly adopted in 2009.

With the introduction of the Localism Act and the Duty to Cooperate, joint working continued and strengthened with the authorities collaborating together on a number of strategic issues. The Northern West Sussex Authorities' Position Statement was originally prepared by Mid Sussex, Horsham and Crawley councils in September 2013, and subsequently revised to support each of the authorities' Local

Plans at examination (July 2014¹, February and March 2015² and March 2016³). Each successfully secured adopted Local Plans⁴ which were found to meet the Duty to Cooperate.

The authorities also work with partners in the wider 'Gatwick Diamond'⁵ area to address strategic planning issues. The aim of this work is to promote the continued prosperity of the Gatwick Diamond and plan for its future growth. As part of this wider area, the authorities have worked on and signed up to the Gatwick Diamond the Memorandum of Understanding and Local Strategic Statement⁶, which was reviewed and updated in 2016.

The Northern West Sussex Authorities positively engage with the West Sussex Coastal Authorities and additionally Brighton and Hove and Lewes, in a number of ways (at Member and Chief Executive officer level), and are members of the West Sussex and Greater Brighton Strategic Planning Board⁷ as well as the Greater Brighton Economic Partnership.

Crawley Borough Council and West Sussex County Council are signatories to a S106 Agreement with Gatwick Airport, in which Mid Sussex and Horsham District Councils are named as Adjoining Authorities. Officers and Members from the authorities meet regularly to discuss issues related to the operation, growth and development of the airport including its master plan, air quality issues, on and off airport parking and surface access. The authorities are also working collaboratively with regard to the Airport's current Development Consent Order (DCO) application. Effective outcomes of this joint working includes:

- success at planning appeals across boundaries; and
- securing financial contributions and ongoing funding monitoring supporting major schemes like Gatwick station improvements and smaller improvements to public transport services.

Whilst recognising that housing markets are not totally discrete, the authorities of CBC, HDC and MSDC continue to work jointly and collaboratively to plan for this distinct Housing Market Area. This follows clear statements set out in each of the three adopted Local Plan Planning Inspectors' decisions who recognised the merit in understanding and aiming to meet the needs of the Housing Market Area as a first step in strategic planning for this part of the country which experiences high demand on land for new development. On this basis, the authorities are building upon this evidence in the preparation of their respective Local Plan reviews, whilst acknowledging the differing timescales and priorities of each authority. However, there is an acknowledgement of the overlaps with the adjoining Housing Market Areas and these are being considered in the context of the Local Strategic Statements (for the Gatwick Diamond and West Sussex and Greater Brighton).

The three local authorities have continued to commission joint evidence, including:

¹ Horsham District Planning Framework Examination

² Crawley Borough Local Plan Examination

³ Mid Sussex District Plan Examination

⁴ Horsham District Planning Framework (November 2015); Crawley Borough Local Plan (December 2015); Mid Sussex District Plan (March 2018)

⁵ Crawley Borough Council, Epsom and Ewell Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, West Sussex County Council, Surrey County Council and Tandridge District Council

⁶ Which can be accessed from each of the Northern West Sussex Authorities' websites:

Crawley -

http://www.crawley.gov.uk/pw/Planning_and_Development/Planning_Policy/GatwickDiamondLocalStrategicStatement/index.htm

Horsham - <http://www.horsham.gov.uk/planningpolicy/planning-policy/gatwick-diamond>;

Mid Sussex - <http://www.midsussex.gov.uk/8573.htm>.

⁷ Adur and Worthing Councils, Arun District Council, Brighton and Hove City Council, Chichester District Council, Crawley Borough Council, Horsham District Council, Lewes and Eastbourne Councils, Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council.

- the Employment Growth Assessment (initially started in 2009, updated in 2010, 2014, and November 2019);
- the Strategic Housing Market Assessment (initially started in 2009, updated in 2012, 2014, 2016 and November 2019);
- The authorities have also worked collaboratively on other studies relevant to the wider Gatwick Diamond area including the Gatwick Water Cycle Study 2011⁸ and catchment based flood risk assessments which are currently in the process of being reviewed and updated.

The authorities, as a matter of course, share methodologies and emerging evidence to ensure consistency and compatibility throughout the area, even if studies are being produced separately⁹.

4. Strategic Matters

The specific strategic matters which the authorities have determined are relevant across the boundaries of the authorities are:

- Employment and economic development: including economic development needs and Gatwick Airport.
- Housing need: including overall housing need, affordable housing need and the needs of specialised housing.
- Specific aspects of infrastructure development: including transport, flooding, water supply and waste water treatment, education and health.
- Strategic sites and/or sites on the boundaries between authorities.

Employment and economic development:

The Northern West Sussex Authorities are located within the wider economic areas of the Coast to Capital Local Enterprise Partnership and the Gatwick Diamond. Joint evidence base work dates back to 2009:

- Employment Land Review (part 1 and part 2), CBC, HDC, MSDC (2009/2010)
- Gatwick Diamond Local Strategic Statement, CBC, HDC, MSDC, MVDC, RBBC, SCC, WSCC (2012)
- Economic Growth Assessment, CBC, HDC, MSDC (2014)
- Economic Growth Assessment Review, CBC, HDC, MSDC (2019)

Separately, as part of the DCO process, the authorities are working collaboratively, with Gatwick Airport and other Gatwick authorities, to understand the implications of expansion of the airport for the local economy.

1. The parties agree the approaches to employment development in currently adopted Local Plans support the economic growth of the Functional Economic Area.

Housing need:

LPA	OAN	Local Plan target	Plan status	Year	Plan period
Crawley	675	340	Adopted	2015	2015-2030
Horsham	650	800	Adopted	2015	2011-2031
Mid Sussex	876	964	Adopted	2018	2014-2031
Totals	2,201	2,104			

⁸ Gatwick Sub-Region Water Cycle Study (2011) Entec UK Limited [Final Report](#)

⁹ These include: Strategic Housing Land Availability Assessments; transport modelling; and Gypsy and Traveller Accommodation Needs Assessments.

The examinations into the three adopted Local Plans established the priority of the authorities to seek to meet the needs of the Northern West Sussex Housing Market Area as a first priority, as far as possible.

The table above shows that the Northern West Sussex Housing Market Area is close to meeting its own objectively assessed housing needs in full for the adopted Plan periods. Against the annual Plan figure there is a shortfall of 97dpa, but when this is considered over full anticipated delivery across the Plan periods it results in a total outstanding amount of 527 dwellings, which equates to 35dpa.

It was recognised through the Mid Sussex District Plan examination that this amount could be monitored against potential over-delivery in any of the three authority areas. As it is anticipated a shortfall would occur only in the latter part of the Plan period, this would be addressed through the District and Local Plan reviews.

On this basis, and noting that each of the authorities have a five year land supply of housing, and have each met the Housing Delivery Test 2019, it is established that the full housing need across the housing market area is met, and Crawley's unmet need figure has been accounted for within the adopted Local Plans for Mid Sussex and Horsham districts.

2. The parties agree that each authority has assessed the ability of its area to accommodate housing development. They each consider that they are doing the maximum reasonable to meet the housing needs, established by the current adopted Plans, of the Housing Market Area as a whole.

Local Plan Reviews

Housing need and supply is to be reviewed as part of the Local Plan Reviews process. For Crawley and Horsham, the Local Plan reviews are in progress. The Mid Sussex District Plan was adopted later than the other two and so is not yet in Review; instead work is progressing on preparing the subordinate Site Allocation Development Plan Document to meet the residual housing requirement set for the currently adopted plan and period. On this basis, the Standard Methodology figures shown in the housing needs table below are illustrative only, and do not yet form current adopted Plan housing need figures.

LPA	MHCLG LHN (Annual)	MHCLG LHN (Total)	Draft Local Plan target (Annual)	Draft Local Plan target (Total)	Plan status	Anticipated Adoption Year	Plan period
Crawley	752	11,280	352	5,280	Reg. 19	2020	2020-2035
Horsham	965	TBC	TBC	TBC	Review Commenced (Reg. 18)	2021	2019-2036
Mid Sussex	1,102	TBC	TBC	TBC	Review to Commence 2020	2023	TBC
Total	2,819						

The Crawley Local Plan Review is currently further progressed than the other authorities. Regulation 18, early engagement, public consultation has been undertaken and the Plan was approved by Full Council in December 2019 for Publication Consultation (Regulation 19), which took place in January –

March 2020, and its subsequent Submission to the Secretary of State for Examination. However, the transport evidence base is not yet in place and, until an agreed position on transport is reached, it is recognised this will have an impact on the timetable for the Plan. The draft Crawley Borough Local Plan 2020 – 2035 identifies sufficient sites (and windfalls) to meet 5,285 dwellings over the 15-year Plan period (2020 – 2035), against the total housing need of 11,281 (based on 15-year multiple of the Standard Methodology: $752 \times 15 = 11,281$). This leaves **5,995 dwellings** arising from Crawley's projected population growth, over the Plan period to 2035, unmet.

The Horsham Local Plan review has commenced and has undergone two rounds of consultation under Regulation 18 (Apr-May 2018 and Feb-Mar 2020). The Mid Sussex District Plan review is due to commence in 2021, with submission to the Secretary of State in 2023. Therefore, it is not possible to confirm any changes to the housing requirement in these areas and the extent to which this can be met, at this time. Evidence work for the Horsham and Mid Sussex plans will confirm future housing requirements and will be set out in future iterations of this SoCG.

- 3. *The authorities agree to continue to work positively together to seek to address the future housing needs of the Housing Market Area as far as possible, taking into account local constraints, and the need for sustainable development.***
- 4. *The authorities will explore the potential opportunities and mechanisms for meeting the housing needs for different groups in the community across the Housing Market Area.***

Infrastructure:

The Northern West Sussex Authorities are in agreement that transport infrastructure required to deliver development in the north of the area is a significant constraint over the lifetime of the respective plans. The three councils will continue to share information as transport studies are updated and will work together where necessary to resolve any cross-boundary issues alongside the LEP, West Sussex County Council or the Highways Agency.

The Northern West Sussex Authorities are in agreement that waste water capacity is a constraint to development in the area, over the lifetime of the respective plans. For the adopted Plans, the water companies confirmed they could manage capacity through improvements to technology. However, in respect of the Plan reviews, additional work may need to be undertaken by the three authorities to look in detail at what long-term actions are necessary to inform the future business plans of the water companies that deliver waste water treatment within the area in conjunction with the Environment Agency (EA) and the water companies. This is being considered jointly with the water companies and the EA through the Gatwick Water Cycle Study review.

The Gatwick Water Cycle Study was originally commissioned in 2011 to look at the issue of Waste Water Treatment Works and the implication of development on water quality in the area. The Gatwick Water Cycle Study indicates that the EA has a clear position on private sewerage treatment works: they will not normally grant discharge consents for a private sewerage treatment system where it is more reasonable to connect to a public foul sewer. A review of the Water Cycle Study has recently been commissioned by the authorities, along with Reigate and Banstead Borough Council.

Crawley has a recognised unmet need for secondary education. This is identified as amounting to 6 forms of entry (180 places per year group) as the relatively recently opened Gatwick Free School provides 4 forms of entry (120 places per year group) which in part addresses the growth in numbers at primary from 2012 amounting to 10 forms of entry in total (300 places per year group). However, the Gatwick Free School does not have permanent planning permission on its current site in Manor Royal Industrial Estate and WSCC are concerned about relying on these places. The further 6 forms of entry

of demand for secondary school places is in the short and medium term and there will be issues from Sept 2021. In the longer term numbers are expected to reduce as entry to primary schools is now falling after a rapid rise from 2012. 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, although the Infrastructure Delivery Plan recognised the need for places might be supplied by a new school. In 2017 the DfE announced a new 6 form entry plus a sixth form Secondary Free School, 'Forge Wood High', to be sponsored by a high performing multi-academy trust. However, given Crawley's constrained land supply, no suitable site has been found to build the school. Therefore, the potential to provide additional secondary school places, to serve Crawley's needs, will be 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 will look to existing schools in and outside the Borough to cater for places on a temporary basis until a new school can be delivered.

5. ***Transport: including with reference to maximising opportunities for sustainable and active travel: Public Transport – rail station, Metrobus extensions, cycling, walking, equestrian, public rights of way; and exploring further the need for, and, if so, opportunities to secure the implementation of, a Crawley Western Link Road. Transport studies are currently under way to identify transport mitigation strategies for Horsham and Crawley Local Plans and for the Mid Sussex Development Plan Document.***
6. ***Education – secondary school and wider education needs, to provide for the needs of new communities, and existing latent demand.***
7. ***Health – there is 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 neighbourhoods. However, the introduction of Primary Care Networks is anticipated by the CCG to enhance capacity.***
8. ***Water/Waste Water Treatment facility enhancements to respond appropriately to emerging evidence.***
9. ***Energy generation – climate change: the parties agree to work together on cross-boundary infrastructure/measures which will help achieve nationally- and locally-set targets.***
10. ***Cross-boundary flood mitigation measures as appropriate.***
11. ***Green Infrastructure enhancements such as G.I. network enhancements and corridor improvements across boundaries.***

Strategic Sites and/or Sites on the Boundaries between Authorities:

12. ***Where strategic development is proposed on the administrative boundaries within the Housing Market Area, the authorities will work together to establish a joint Planning Policy position to support positive Development Management.***

5. Governance Arrangements

The three authorities of CBC, DHC and MSDC recognise that there are different local circumstances which need to be taken into account as part of any joint working including:

- Each authority has different land constraints and development pressures;
- Each authority is at a different stage in the process of producing their plans; and,
- There are issues better addressed through bilateral or other arrangements.

Despite these limits, the authorities are committed to working positively together and as part of the Gatwick Diamond and West Sussex and Greater Brighton Strategic Planning Board, sharing information and best practice and continuing to procure evidence jointly, where relevant, throughout the plan

preparation phase and beyond. This co-operation and collaboration takes place at senior Member, Chief Executive and senior officer as well as at technical officer level.

13. It has been agreed between the Authorities that:

- a. *A joint Local Plan does not need to be produced at this stage, although an adopted local Joint Area Action Plan exists between Crawley Borough and Horsham District Councils, and the need for a Joint Plan, Area Action Plan or Policies, between some or all of the Authorities, will be kept under review and considered if circumstances warrant this;*
- b. *Each authority will determine its own employment and housing targets but in so doing will consider them in the context of the key strategic issues and the particular circumstances of the other authorities, prioritising the needs of the Housing Market Area; and,*
- c. *They will continue to work with the other Gatwick Diamond and West Sussex and Greater Brighton authorities on housing, employment and other strategic issues affecting the Gatwick Diamond and West Sussex and Greater Brighton as a whole.*

14. *To work collaboratively on Plan preparation and evidence whilst acknowledging others' timetables and timescales. To respect each other's right to develop their own plans that fit the specific circumstances of the District/Borough's communities.*
15. *To meet regularly at Member and officer level to review the situation and respond to new issues and changing circumstances.*
16. *To consider the role and extent of the Housing Market Area in relation to the Strategic Matters for Planning.*
17. *To liaise jointly, and individually, with adjoining Authorities and those in overlapping Housing Market Areas as well as other cross-authority Geographies (such as the Functional Economic Areas, City-Region, Gatwick Area, River Basin and Habitat Regulations).*
18. *To work to produce a joint evidence base on relevant issues wherever possible and logical, and to continue to keep each updated where commissioning evidence to ensure consistency is maintained.*
19. *This SoCG will be updated as progress continues through the preparation of the Local Plans and Development Plan Documents for each of the authorities.*

6. Timetable for review and ongoing cooperation

LPA	Present Plan Adoption	Proposed Plan Review Date	Target Reg.18 Date	Target Reg.19 Date	Target Submission Date
Crawley	Dec 2015	Dec 2020	July 2019	Jan 2020	TBC 2020
Horsham	Nov 2015	Dec 2021	Feb 2020	Autumn 2020	Early 2021
Mid Sussex	Mar 2018	2023	2021	2023	2023
West Sussex Minerals	July 2018	Five Year Review due July 2023	Not known	Not known	Not known
West Sussex Minerals – Soft Sand Review			March 2019	Jan 2020	April 2020
West Sussex Waste	April 2014	Five Year Review undertaken May 2019. Next Five Year Review 2024	Not known	Not known	Not known

Agenda

Attendees

Present at the meeting:

- Matthew Bates – Planning Policy Team Leader, HDC [MB]
- Tal Kleiman – Senior Planning Policy Officer, HDC [TK]
- Andrew Marsh – Business Unit Leader – Planning Policy, MSDC [AM]
- Estelle Maisonnial – Senior Planning Policy Officer, MSDC [EM]

1. Horsham District Council Local Plan Update

MB/TK provided an update on progress of the Horsham District Local Plan. Highlighted that in January, a draft version of the Regulation 19 Local Plan had been subject to an Advisory Visit ('healthcheck') by PINS. PINS advised further work with Statutory Consultees (particularly Highways England) in respect of the Duty to Cooperate.

It was explained that Local Plan was likely to go to Cabinet on 20th May and full Council on 9th June to agree to publish Regulation 19 Local Plan for representations, and that this was identified in a recently adopted LDS.

It was explained that the majority of development will be on strategic sites and an explanation of potential site yields on such sites were provided. It was explained that a new settlement would be allocated in the centre or south of the district, but if officers' recommendations are accepted this will not be at Mayfield.

2. Mid Sussex Local Plan/Site Allocations of Land Update

AM provided an update on the progress of DPDs at Mid Sussex. The Site Allocations DPD seeks to provide for the remaining apportionment of the District Plan's housing requirement. It proposes allocations for around 1,800 homes, as well as a Science and Technology Park and smaller employment allocations.

The Plan was submitted for Examination and MSDC has responded to first round of Inspector's questions, with the second set of questions expected imminently. Hearings expected in June and hopeful of being able to adopt in September.

The District Plan review has also commenced and have undertaken a call for sites to supplement existing list of sites. Likely to undertake Regulation 18 later this year and aiming for adoption in 2023 to reflect existing adopted policy.

3. Strategic planning issues for cross-boundary consideration

- a. Dealing with unmet housing needs, including housing numbers across authorities in West Sussex; Strategic Sites; Local Strategic Statement 3; changes to the standard method calculation and London/Surrey considerations

The relationship with meeting the needs of both our own respective authorities and Crawley BC's unmet needs were discussed given that both the Horsham District Planning Framework (2015) and Mid Sussex District Plan (2018) housing targets' are raised above local need to help address unmet needs in Crawley.

MB explained that, in principle, the Horsham District Local Plan would likely meet half of CBC's unmet need. AM explained that MSDC haven't reached a stage in their plan making to determine the extent to which the Council could contribute towards unmet need within the HMA or beyond, as further work was necessary to understand if MSDC had that ability. This included undertaking a SHMA; HRA work in relation to the Ashdown Forest SAC/SPA; and an assessment of potential development sites, of which there were 5 large (1,000+ home sites). MSDC's position had been explained to CBC in the MSDC's response to their Regulation 19 Local Plan. It was agreed that further work was necessary to progress an agreed NW Sussex Statement and that this was already progressing.

There was separate consensus that both authorities were in a similar position in respect of unmet needs of Crawley, coastal Sussex authorities and Surrey authorities being referenced, with current and historic requests to meet unmet needs noted. There was agreement that given the housing market geographies that both authorities would seek to prioritise meeting unmet need in NW Sussex over meeting the needs of coastal authorities as this was the 'primary' HMA historically and backed up in more recent evidence.

HDC provided confirmation that it was planning to meet its own need and would not request assistance from MSDC. MSDC also did not foresee that it would request assistance from other authorities although this would be confirmed upon receipt of the SHMA and completion of other evidence base work.

AM indicated that he was aware that HDC had done work on market absorption as part of the Local Plan and wondered whether this was available. MB explained that this would be published when Regulation 19 publication period commences but was happy to share, confidentially, in advance.

Action: MB to share Housing Deliverability Study

- b. Employment Needs

MB/TK confirmed that it was likely to fully address its own employment needs as well as providing additional land in strategic development sites to ensure good placemaking. MB highlighted implications may arise in respect of in-commuting patterns, from HDC providing a supply of employment land above their assessed need, however no particular concern was raised.

Similarly, MSDC confirmed that it was meeting its own needs by proposing seven employment allocations in its Site Allocations DPD. It was further explained that the Science and Tech Park was proposed to be an allocation of around 50 hectares, that could supply 2,500 jobs. This allocation was carried from an aspiration contained in the District Plan to go beyond meeting local need and meet a wider, regional need.

- c. Gypsy & Traveller Needs

HDC explained that it will seek to meet its G&T need in its Local Plan, predominantly by requiring Strategic Sites to make an allowance of between 5 and 15 pitches, depending on size.

AM explained that ORS had been appointed to undertake their GTAA, which would inform the review of its District Plan.

d. Infrastructure Needs

AM explained that MSDC had done modelling at the A2300 and A23 junction at Hickstead which shows (within the strategic transport model) that their Site Allocations DPD would have a severe impact. SoCG with Highways England (HiE) agreed in past month to identify mitigation options and more detailed work continues to identify the design and cost of such work, which would also be documented. MB asked that MSDC share the updated work when produced, given the same junction may be significantly affected by the Horsham LP and HDC may also need to look at mitigation of the junction.

Action: MSDC to send over further HiE work when produced.

MB also identified that HDC were also working with HiE to agree a SoCG. It was explained that although transport modelling suggests very limited impact on strategic road network for Local Plan, HiE has asked for any impacts on the SRN to be mitigated.

AM explained that further infrastructure in Mid Sussex would be needed. This could include additional Suitable Alternative Natural Greenspace (SANG) capacity to mitigate impacts on the Ashdown Forest.

e. Statements of Common Ground

MB confirmed the intention that SoCGs will be produced with most neighbouring authorities. MB explained that to avoid repetition within reports, there will be a Part A to all SoCGs, covering issues relevant to all authorities. Part B SoGs will cover issues specific to particular authorities.

Action: TK to draft and circulate SoCG Parts A and B.

4. Agreed Actions

Action: MB to share Housing Deliverability Study

Action: MSDC to send over further HiE work when produced.

Action: TK to draft and circulate SoCG Parts A and B.

5. AOB

No other items were discussed.