

Crawley

Local Plan

Crawley Borough Local Plan Topic Paper 1:

Unmet Needs and Duty to Cooperate



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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 outcomes of key progress made in relation to these through the Duty to Cooperate. The Duty to Cooperate Statement sets the wider context in which the Crawley Borough 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	12,000 dwellings (750dpa)	5,320 dwellings (332.5dpa)	6,680 dwellings (417.5dpa)
Affordable Housing	11,824 dwellings (739 dpa)	2,128 dwellings* ¹ (133 dpa)	9,696 dwellings (606 dpa)
Self- and Custom-Build Housing	80 Part 1 entries on the Register (102 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.

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
Gypsy, Traveller and Travelling Showpeople	No immediate need; Potential need for 10 pitches over the Plan period.	One new site for up to 10 permanent residential Traveller pitches.	None
Employment	38.7ha Business Land (of which 32.8ha Industrial Land).	17.6ha on sites within Main Employment Areas (of which 8.7ha is for Industrial Land) & 24.1ha Industrial Land through the allocation of a new Strategic Employment Site.	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 sites.	6-8 forms of entry (180-240 places per year group) Secondary Education.
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, in light of Crawley’s tight administrative boundaries, the historic Gatwick Airport ‘safeguarded’ land for a potential southern runway and physical constraints such as aircraft noise contours, flooding, nature conservation constraints and few infill opportunities due to the age and planned nature of the New Town, there is very limited land within the borough for accommodating further development.

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.

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>

Housing:

- 2.1.3 Paragraph 2.23 of the adopted Local Plan confirms that Crawley's housing market functions within a wider geographic area, identified as the Northern West Sussex (NWS) Housing Market Area (HMA), which 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.
- 2.1.4 There is already long-established, effective joint working within the NWS HMA: 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 supporting the delivery of economic growth within the Gatwick Diamond³. Historically, Crawley has worked jointly with Mid Sussex and Horsham to maximise the sustainable delivery of housing needed for the HMA. This has included a number of strategic studies, including the At Crawley Study (2009), the New Market Town Study (2010) and West Sussex Bio City (2010). Through this joint working, the successful adoption of the Joint Area Action Plan for West of Bewbush resulted in the subsequent build-out of Kilnwood Vale, still under construction, as a new neighbourhood to Crawley within Horsham District.
- 2.1.5 Adopted Local Plan Policy H1 commits the council to working closely with its neighbouring authorities, particularly those within the NWS HMA, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet Crawley's unmet need in sustainable locations. The Policy confirms this will include continued assessment of potential urban extensions to Crawley.
- 2.1.6 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 in the current round of adopted Local Plans will be addressed albeit with a small indicative deficit. As shown in Table 2, 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 527 dwellings outstanding (equal to 35 dwellings per year over the 15 year Crawley Plan period). It should also be noted that since the adoption of the Local Plan in 2015, Crawley has delivered a total oversupply against the Crawley Borough Local Plan annualised average of 658 dwellings⁴ and from April 2017 to March 2019, Mid Sussex delivered a total oversupply of 455 dwellings against their Local Plan target over that two year period.

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

⁴ 2,018 Total of net dwellings (2015/16: 541 dwellings; 2016/17: 596 dwellings; 2017/18: 369 dwellings; 2018/19: 512 dwellings) – 1,360 Total annualised average (340 x 4) = 658 dwellings (data from Crawley Authority Monitoring Report 2018/19 (2020) CBC: <https://crawley.gov.uk/sites/default/files/2020-11/Crawley%20Borough%20Local%20Plan%20Authority%20Monitoring%20Report%202018-19.pdf>)

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:

2.1.7 The adopted Local Plan Policy EC1 acknowledges there was a potential for a shortfall of 35ha of business land provision arising within the borough over the Plan period. However, the Local Plan sought to take 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.

2.1.8 Horley Strategic Business Park, allocated by Policy HOR9 of the Reigate and Banstead Development Management Policies DPD, is anticipated to approximately 200,000 square metres of office-led employment floorspace. The allocation will meet a significant proportion of Crawley's identified office needs from the adopted Crawley Local Plan 2015, though will not meet any of its outstanding industrial needs.

2.2 Legislation

2.2.1 The Localism Act 2011⁵ places a legal Duty to Cooperate on local planning authorities and other prescribed bodies to address strategic planning issues relevant to their areas in the preparation of their Local Plans and other planning documents and to work together on such issues.

⁵ 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.

2.3 National Policy

- 2.3.1 National planning policy set out in the National Planning Policy Framework (NPPF)⁶ 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.
- 2.3.2 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 (including, but 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)⁷.
- 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 elsewhere⁸.

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) Icen Projects
 - Crawley Borough Council: Windfall Allowance Statement (December 2020) CBC
 - Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020) CBC
 - Northern West Sussex Economic Growth Assessment (January 2020) Lichfields
 - Crawley focused NWS EGA update (September 2020) Lichfields
 - Employment Land Trajectory (September 2020) CBC
 - Draft Sustainability Appraisal/Strategic Environmental Assessment (January 2021) CBC
 - Transport Modelling Study (final anticipated January 2021) Stantec
 - Viability Study (final anticipated January 2021) DixonSearle
 - Draft Infrastructure Plan (January 2021) 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 (2020) CBC, HDC, MSDC, WSCC

⁶ NPPF, para. 11 (2019) MHCLG

⁷ NPPF, para. 61 (2019) MHCLG

⁸ NPPF, para. 26 (2019) MHCLG

The council is working closely with Horsham District Council, Mole Valley District Council and Reigate and Banstead Borough Council to finalise bilateral Statements of Common Ground regarding specific strategic matters of importance to each council. These will be published as soon as they are agreed and this Topic Paper will be updated accordingly.

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 that the government's Standard Methodology for calculating housing need results in a total housing need for the 16 year plan period (2021-2037) of 12,000 dwellings (based on 750 dwellings per annum), set out in more detail in Topic Paper 3.
- 3.1.2 The draft Local Plan Policy H1 identifies the borough's land supply allows for 44% of this to be met on sites within the borough's administrative boundaries: a minimum totalling 5,320 dwellings. The reasons for this are set out in Topic Paper 4: Housing Supply. This equates to an annualised average of 332.5 dwellings per annum (dpa). However, a stepped trajectory is reflected in the Policy to account for the higher delivery in the early- to mid-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 (2021-26): 350dpa
 - Years 6-10 (2026-31): 450dpa
 - Years 11-16 (2031-37): 220dpa.
- 3.1.3 The council is working hard to maximise capacity within the borough's boundaries, including by introducing high density targets for the Town Centre and accessible locations (Policy CL4) and 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 of 12,000 over the period 2021-37, there will be a remaining unmet housing need, of approximately 6,680 dwellings, arising from Crawley over the Plan period. This will occur as follows:
- Years 1-5 (2021-26): 400dpa
 - Years 6-10 (2026-31): 300dpa
 - Years 11-16 (2031-37): 530dpa
- 3.1.5 Through the signed Statement of Common Ground for the Northern West Sussex Authorities (May 2020)⁹, the parties agreed that housing need is a relevant strategic matter and in particular agreed that it was critical that they continued to work positively together to seek to address the housing needs of the Housing Market Area

⁹ 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>

(HMA). Therefore, it is anticipated that the remaining unmet need figure of 6,680 dwellings will be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

3.1.6 Currently, the adopted Local Plans for Horsham and Mid Sussex are anticipated to provide an additional 3,000 dwellings¹⁰, predominantly to meet Crawley’s unmet needs, above their objectively assessed housing needs, over the period from 2021 to 2031. However, it is acknowledged that the Standard Method has increased the objectively assessed housing need for the other authority areas within the HMA and so 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.

Table 3: NWS HMA Standard Method and Local Plan Status

LPA	Local Housing Need ¹¹	Local Plan target	Plan status	Plan period
Crawley	750	Annualised Average: 332.5dpa 350 dpa (yrs 1-5) 450 dpa (yrs 6-10) 220 dpa (yrs 11-16)	Regulation 19 Proposed Submission	2021-2037
Horsham	920	tbc	Anticipated Regulation 19 Feb 2021	2020-2037
Mid Sussex	1,114	876 dpa (yrs 1-4) 1,090 dpa thereafter	Adopted Mar 2018	2014-2031
NWS HMA	2,510	tbc (combined LP targets)		
Surplus/Deficit	tbc	tbc		

3.1.7 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. Developments 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 to the west of Crawley along the Rusper Road (95 dwellings and 36 dwellings) have subsequently commenced. Further development is being explored through the Horsham District Local Plan review process through the promotion by Homes England of strategic scale development to the West of Crawley of up to 10,000 new dwellings, in the form of three new neighbourhoods to Crawley over the longer term (beyond the current review Plan periods). The draft Submission Horsham District Local Plan is due to be

¹⁰ 150dpa x 10 = 1,500 (Horsham District Planning Framework) + 1,498 dwellings (Mid Sussex District Plan, Policy DP4)

¹¹ The Standard Method for calculating Local Housing Need has been used. Note: Mid Sussex District Council is included for illustrative purposes – the Objectively Assessed Need at the time of their Local Plan Examination was 14,892 over a 17 year period (2014 – 2031).

published for Regulation 19 consultation in February 2021. Within this review Plan period, the first phase of this proposal is being considered, as a new neighbourhood to the west of Ifield. Crawley Borough Council has worked closely and continually with Horsham District Council and West Sussex County Council to understand the implications and opportunities of this proposal. Should this site be progressed, whilst the main built development would be within Horsham district, infrastructure connections would be into the borough and the significant impacts, visual, environmental and in terms of demands on the services and facilities, would be most significantly on Crawley. 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, 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:

3.1.8 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.

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

Affordable Housing:

3.1.10 With particular reference to affordable housing, the SHMA has highlighted a net need for 739 affordable homes per year in Crawley (of which 563 dwellings per year are needed as rented affordable housing). As Crawley is only able to meet approximately 44% of its overall housing needs within the borough, even with meeting a full 40% affordable housing requirement established by the Local Plan policy (Policy H5) there will be a significant shortfall of affordable housing. As set out in Topic Paper 3, viability challenges mean for those residential developments within the Town Centre only 25% affordable housing can be required.

3.1.11 Therefore, where Crawley's unmet housing needs are being met outside the borough boundary, discussions have been taking place to explore and agree mechanisms for Crawley's affordable housing needs to similarly be met, including through nomination rights being extended to residents on Crawley's housing register. This is 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;
Pease Pottage – agreement with Mid Sussex District Council in place.

Self and Custom Build Homes:

- 3.1.12 The SHMA has 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.
- 3.1.13 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 (particularly if there are duplicate entries on the Self-Build Registers across districts and boroughs).

Gypsy, Traveller and Travelling Showpeople

- 3.1.14 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. As set out in the Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, there is not an immediate need for new pitch or plot sites within the borough. However, 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 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. 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, joint working undertaken across Northern West Sussex through the joint commissioning of the recent Economic Growth Assessment (EGA), 2020, has 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 (September 2020), there is need for a minimum of 38.7ha new business land in the borough for the period to 2036. This need is significantly within the industrial sectors (32.8ha), with office needs accounting for 5.9ha of the total. Crawley’s Employment Land Trajectory (September 2020) identifies an available employment land supply pipeline of 17.6ha, which comprises 8.8ha office land and 8.7ha industrial land. This supply is sufficient to meet Crawley’s quantitative office needs in full, though there is only sufficient land to meet

industrial needs in the early part of the Plan period, resulting in a shortfall of 24.1ha industrial land, principally within the B8 storage & distribution sectors. Therefore, 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, referred to as Gatwick Green. There are, therefore, no 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 6-8 forms of entry (180-240 places per year group) as the relatively recently opened Gatwick Free School provides 4 forms of entry (120 places per year group). A proportion of its pupils are from Horley in Surrey. However, the Gatwick Free School does not have permanent planning permission on its current site in Manor Royal Industrial Estate and West Sussex County Council (WSCC) are concerned about relying on these places.

3.3.2 The further 6-8 forms of entry of demand for secondary school places is in the short and medium term and there will be capacity 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.

3.3.3 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 Department for Education (DfE) announced funding for a new six form entry plus a sixth form Secondary Free School, 'Forge Wood High', within Crawley to be sponsored by a high performing multi-academy trust.

3.3.4 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. 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. Also, notwithstanding the lack of a suitable site for a secondary school within Crawley, the submission draft 2021 Local Plan 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.

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 (2021 – 2037) is:
- Housing: 6,680 dwellings;
 - Affordable Housing: 9,696 dwellings;
 - Self- and Custom- Build: Unknown;
 - Gypsy, Traveller and Travelling Showpeople: None;
 - Employment: None;
 - Education: 6-8 forms of entry (180-240 places per year group) Secondary Education;
 - Health: Unknown. May be addressed by the Primary Care Network.
- 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. 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. 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.