

## 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**



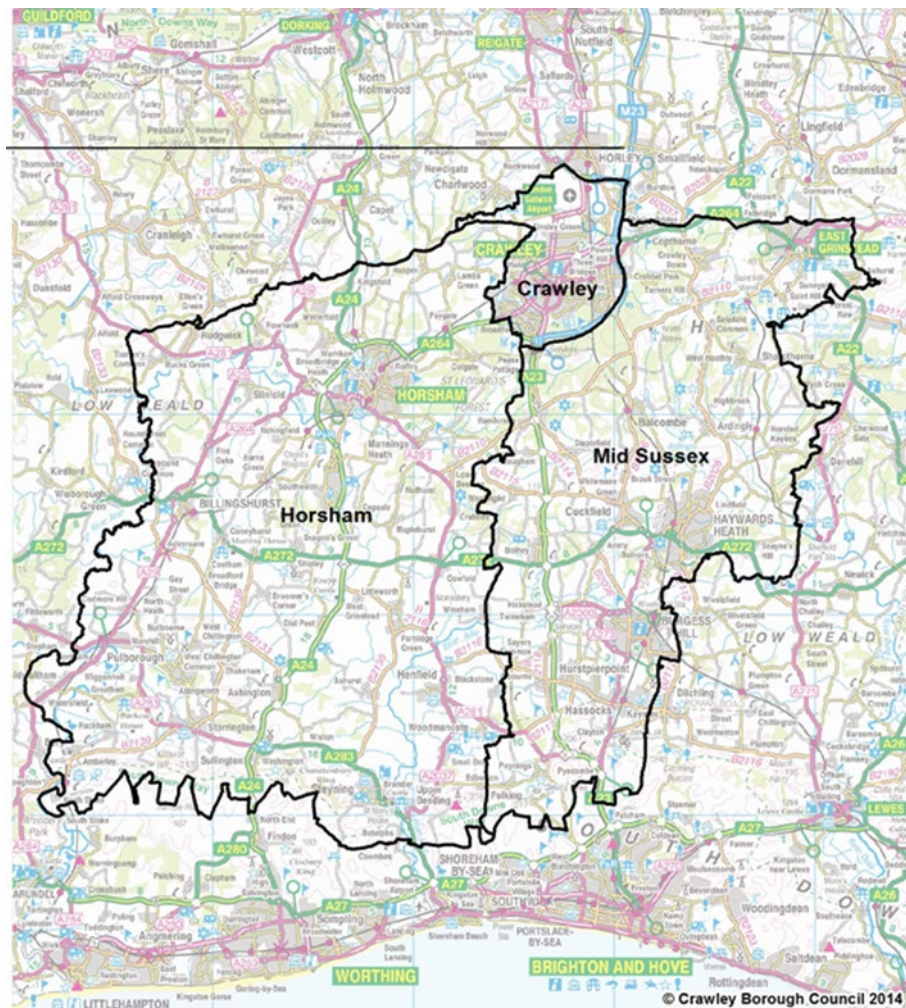
**01.06.20**

**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 2014<sup>1</sup>, February and March 2015<sup>2</sup> and March 2016<sup>3</sup>). Each successfully secured adopted Local Plans<sup>4</sup> which were found to meet the Duty to Cooperate.

The authorities also work with partners in the wider 'Gatwick Diamond'<sup>5</sup> 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 Statement<sup>6</sup>, 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 Board<sup>7</sup> 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:

<sup>1</sup> Horsham District Planning Framework Examination

<sup>2</sup> Crawley Borough Local Plan Examination

<sup>3</sup> Mid Sussex District Plan Examination

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

<sup>5</sup> 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

<sup>6</sup> 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](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>.

<sup>7</sup> 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 2011<sup>8</sup> 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 separately<sup>9</sup>.

#### 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
<b>Crawley</b>	675	340	Adopted	2015	2015-2030
<b>Horsham</b>	650	800	Adopted	2015	2011-2031
<b>Mid Sussex</b>	876	964	Adopted	2018	2014-2031
<b>Totals</b>	<b>2,201</b>	<b>2,104</b>			

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

<sup>9</sup> 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
<b>Crawley</b>	752	11,280	352	5,280	Reg. 19	2020	2020-2035
<b>Horsham</b>	965	TBC	TBC	TBC	Review Commenced (Reg. 18)	2021	2019-2036
<b>Mid Sussex</b>	1,102	TBC	TBC	TBC	Review to Commence 2020	2023	TBC
<b>Total</b>	<b>2,819</b>						

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