

1. List of Parties involved:

- Crawley Borough Council (CBC)
- Arun District Council (RBBC)

2. Signatories:



17/06/21

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



22/07/21

*Arun District Council
Councillor R. Bower, Chair of Planning Policy Committee*

3. Strategic Geography

The Statement of Common Ground (SOCG) covers the local authority areas of Crawley Borough Council (CBC) and Arun District Council (ADC) and is a sound basis for co-operation on strategic matters identified in this SOCG.

CBC and ADC are located within the county of West Sussex. They do not share an administrative boundary, and are separated by the district of Horsham. The South Downs National Park crosses the northern part of ADC and the southern part of Horsham.

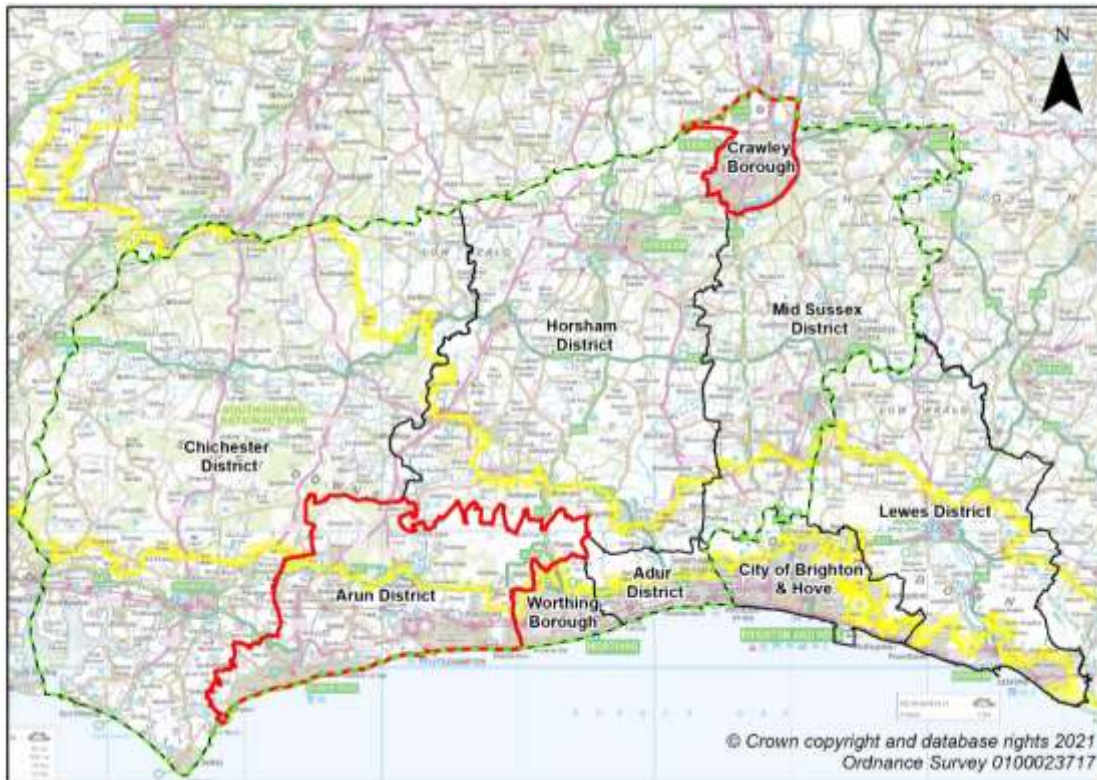
Crawley is a land-constrained borough, due to its tight administrative boundaries, the requirement to 'safeguard' land south of Gatwick Airport for a potential southern runway, and physical constraints such as aircraft noise, flooding, nature conservation and there being few infill opportunities due to planned nature of the New Town. Therefore, there is very limited land within the borough that is suitable, available and achievable for accommodating further development.

ADC is a Coastal West Sussex authority that extends from Chichester in the west to Worthing in the east. It contains the towns and larger villages of Littlehampton, Bognor Regis, Arundel, Barnham and Angmering, as well as a number of smaller villages and hamlets. Much of the northern half of the district (approximately one third) is within the South Downs National Park. It is bounded to the south by the English Channel. The authority is affected by significant environmental and infrastructure requirements including protected European habitats, flooding, waste water treatment and water quality issues, and constrained east-west connectivity on the A27 and A259 which require improvements to support planned growth.

The Arun Valley train line links the two areas running from Three Bridges Station in Crawley to Barham, Bognor Regis and Littlehampton in Arun.

Both authorities are located within the Coast to Capital Local Enterprise Partnership (LEP) Area. The two authorities are involved in positive and active engagement on strategic matters through the West Sussex and Greater Brighton Strategic Planning Board and, prior to this, the West Sussex Joint Planning Board.

The map below shows the authorities in relation to each other (i.e. indicated with the red administrative boundaries).



A scale map of the West Sussex and Greater Brighton Authorities is provided in Appendix A.

4. Strategic Matters

Both parties have a collective and shared view of the long term priorities and have identified specific strategic objectives:

- to work collaboratively on Housing Need, including Gypsy, Traveller and Travelling Showpeople needs, across the respective Housing Market Areas (North West Sussex Housing Market Area and Coastal West Sussex Housing Market Area);
- to establish a mutual understanding of the Employment Land requirement and the economic development impact of COVID-19 on the area;
- to develop an agreed position in relation to water supply and waste water treatment impacts of strategic allocation sites.

Background information and context to support the above strategic objectives is set out in Appendix B. **Agreements** reached for each of the matters are set out below:

Housing Need:

The parties agree:

1. CBC is located in the Northern West Sussex (NWS) Housing Market Area (HMA) and ADC is located in the Coastal West Sussex (CWS) HMA, particularly focused on the Bognor Regis and Chichester travel to work area and the Littlehampton and Worthing HMA.
2. There is some relationship between the NWS HMA and the CWS HMA. However, this is focused on the southern parts of Horsham and Mid Sussex districts.
3. The draft Crawley Local Plan identifies that Crawley's land supply allows for almost half of its overall housing needs to be met on sites within the borough's administrative boundaries: a minimum totalling 5,320 dwellings over the Plan period (2021 – 2037). This leaves a total unmet need figure of 6,168 dwellings (385.5dpa) to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.
4. ADC has not yet scoped the OAN to be tested for its own plan update based on the Standard Housing Methodology (a study anticipated later in 2021) and was not in a position to understand need and capacity at this time.
5. ADC's Adopted Local Plan already contributes 1,600 dwellings towards unmet needs in Chichester and Worthing (the strongest functional links) and it should also meet some unmet needs for elsewhere in the sub-region under the Duty to Cooperate. Currently, ADC is updating its Local Plan and is not in a position to address any of CBC's unmet housing needs, this being a matter for the West Sussex and Greater Brighton Local Strategic Statement (LSS3) process to address wider cross boundary matters under the Duty to Cooperate.
6. Where CBC cannot meet its housing need within its own boundary, it should first prioritise working collaboratively with authorities within its HMA to address the identified housing need.
7. CBC and ADC will engage through the Greater Brighton and West Sussex Authorities, as a wider Duty to Cooperate forum, with other neighbouring authorities in relation to housing related matters, including affordability, large scale developments and opportunities for meeting unmet need.
8. As each authorities' respective housing supply or updated housing market evidence is completed, the findings will be shared with the councils.

Gypsy, Travellers and Travelling Showpeople

The parties agree:

9. Both authorities will each seek to meet their own need for additional Traveller provision.
10. No significant cross boundary matters identified although noted the current situation in Arun G&T DPSD.

Employment, economic development and retail

The parties agree:

11. CBC is located within the Northern West Sussex Functional Economic Market Area.
12. An Economic Growth Assessment (2020) has been undertaken which identifies the employment land requirement for Crawley is 24.1ha of unmet B8 storage and distribution accommodation. A proposed new industrial-led (B8 storage and distribution) Strategic Employment Location at Gatwick Green, is planned to ensure this need is met within Crawley's boundary.
13. ADC is located within the Coastal West Sussex functional economic area. The adopted Arun Local Plan is contributing towards the unmet employments needs arising within its

functional economic area through its employment supply e.g. the Bognor Regis Enterprise allocation.

14. No significant cross boundary matters identified.

Infrastructure

The parties agree:

15. No significant road/rail or aviation related cross boundary matters identified.

16. Arun is not in the Crawley river basin catchment (the River Mole catchment), for which water drains northwards to the River Thames.

17. The draft Crawley HRA has highlighted a concern regarding water abstraction from the Hardham site, which affects those authorities in the Southern Water Sussex North Water Catchment (Crawley, Horsham and north Chichester predominately). A small area of Arun (within the South Downs National Park) is also served by this, but no development is proposed in this location.

Minerals and Waste

The parties agree:

18. No significant cross boundary matters identified.

5. Governance Arrangements

The authorities are committed to working positively together, sharing information and best practice and continuing to procure evidence jointly, where appropriate, 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.

Joint working will include the following existing governance arrangements:

- West Sussex and Greater Brighton Strategic Planning Board (and associated Chief Planning Officers Group);
- West Sussex Leaders and Chief Executives; and
- West Sussex Planning Policy Officers Group.

This Statement of Common Ground is signed at member level (Chair of Planning Policy Committee in ADC and Planning Portfolio Holder at CBC) and will be reviewed at each key stage of plan-making. It will be updated to reflect progress made through effective cooperation.

In terms of governance, the authorities agree to:

19. continue to work with the other West Sussex and Greater Brighton authorities on housing, employment and other strategic issues affecting the strategic sub-region as a whole;
20. meet at member and officer level where relevant and necessary to review the situation and respond to new issues and changing circumstances; and
21. update this SoCG 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	Reg.18 Date	Target Reg.19 Date	Target Submission Date
Crawley Local Plan	Dec 2015	2019 - 2021	July 2019	Jan 2020/Jan 2021	Autumn 2021
Arun District Local Plan	July 2018	2031 – 2036 (TBC)	Dec 2021	TBC	TBC

**APPENDIX A: CRAWLEY AND ARUN LOCAL AUTHORITY AREAS
AS PART OF WEST SUSSEX & GREATER BRIGHTON**



APPENDIX B: BACKGROUND SUPPORTING CONTEXT

Housing Need:

Crawley's submission Local Plan confirms that the government's Standard Methodology for calculating housing need results in a total housing need for the plan period (2021-2037) of 11,488 dwellings (based on 718 dwellings per annum). The draft Crawley Local Plan identifies that 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 5,320 dwellings. This equates to an annualised average of 332.5dpa. This leaves a total unmet need figure of 6,168 dwellings (385.5dpa) to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

Crawley lies within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts, and across which there is already long-established, effective joint working. Crawley's unmet housing need established from the adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Currently, the adopted Local Plans for Horsham and Mid Sussex are anticipated to provide an additional 3,150 dwellings, predominantly to meet Crawley's unmet needs, above their objectively assessed housing needs, over the period from 2021. However, it is acknowledged that through Local Plan Reviews this is likely to change, particularly as the Standard Method increases the housing needs within these districts above those established in the adopted Plans. The agreed NWS Statement of Common Ground¹ (May 2020) confirms 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"* (agreement no. 3).

Arun's adopted Local Plan confirms an OAN of 919 homes per annum (ADC Updated Housing Needs Evidence 2016). However, a housing target of 1,000 was adopted in the Local Plan which makes a contribution towards unmet housing needs in neighbouring authorities and the wider HMA of 1,600 dwellings over the Plan period.

LPA	MHCLG LHN	Local Plan target	Plan status	Year	Plan period
Crawley	718dpa	332.5dpa	Reg.19 Consultation	2021/22	2021-2037
Arun	N/A	1,000dpa	Adopted	2018	2011-2031

Gypsy, Traveller & Travelling Showpeople:

Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment

As with bricks and mortar housing, Crawley's constrained land supply and unacceptable noise levels associated with Gatwick Airport for residential, and particularly caravan, accommodation, means there is significantly limited opportunities for provision of sites to meet accommodation needs of Gypsies, Travellers and Travelling Showpeople within Crawley borough's administrative boundaries. CBC has published its draft Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment as part of the Local Plan Regulation 19 Consultation. This confirms that there is a limited mix of temporary and permanent small family owned private sites in the north of the borough. Most Travellers in

¹ <https://crawley.gov.uk/sites/default/files/2020-06/NWS%20SoCG%20May%202020%20final%20signed.pdf>

the borough live in Bricks and Mortar. There is one private, single family unit site for Travelling Showpeople. The draft Submission Crawley Borough Local Plan (2021 – 2037) includes the continued allocation of a ‘reserve’ site for accommodating up to ten pitches for Gypsies and Travellers, should a need arise in the new Plan period.

Arun Gypsy & Traveller & Traveller Showpeople Development Plan Document (G&T DPD)

The Arun G&T DPD is preparation and is at Regulation 18 stage and identifies a need for provision for 9 additional pitches and 14 traveller showmen plots for the period 2018 to 2036.

Arun’s Gypsy & Traveller and Travellers Showmen ‘preferred options’ Development Plan Document was reported to Planning Policy Committee on 22 September and was agreed for a Regulation 18 public consultation 1 October to 26 November 2020. The DPD propose to meet all of Arun’s G&T requirement within the district. However, since then, in response to the Regulation 18 consultation, West Sussex County Council (WSCC) had lodged an objection to 3 sites proposed for intensification (1x G&T Traveller pitch and 2 x Traveller Showmen plots) because of restrictive covenants regulating the disposed land. Arun is liaising with WSCC on their intentions to pursue enforcement or to concede these existing and permitted G&T uses of the land. If not satisfactorily resolved - there may be a need for a further call for sites consultation or potentially there may be a level of unmet need if alternative measures to configure the existing sites to compensate, are exhausted.

<ul style="list-style-type: none"> • Key objective 	<p>Working collaboratively on Housing Need across the wider West Sussex and Greater Brighton strategic area, and across the two Housing Market Areas as far as is relevant.</p>
<ul style="list-style-type: none"> • Relevant studies, intelligence or evidence base completed or to do 	<ul style="list-style-type: none"> • Northern West Sussex Strategic Housing Market Assessment (2019) • Crawley Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020 Review) • ADC Updated housing Needs Evidence (2016) • Joint Coastal West Sussex GTAA (2019)
<ul style="list-style-type: none"> • Key conclusions from the evidence 	<ul style="list-style-type: none"> • Crawley lies within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts. • Arun lies within the Coastal West Sussex Housing Market Area, with travel to work connections between Bognor Regis and Chichester, and the Littlehampton and Worthing HMA. • There is no immediate need arising from Crawley’s Gypsy, Traveller and Travelling Showpeople population for new pitch or plot sites. However, there may be a need arising later within the Plan period. • Joint Coastal West Sussex GTAA 2019 updated provision for the period 2019 to 2036 requiring provision for 9 additional pitches and 14 traveller showmen plots.

	<ul style="list-style-type: none"> G&T Site identification Study 2019 identified that G&T need can be accommodated wholly within Arun via intensification of existing sites and through an broad location area of search towards the end of the plan period.
<ul style="list-style-type: none"> Agreement that has been reached or progress made 	<ul style="list-style-type: none"> Where each party cannot meet its housing need within its own boundary, it should work collaboratively with its neighbouring authorities within its HMA to address the identified housing need within the HMA as a first priority.
<ul style="list-style-type: none"> Any further actions / governance requirements etc. 	<ul style="list-style-type: none"> As each of the housing supply or updated housing market evidence is completed, the findings will be shared with between the councils.

Employment and economic development:

Crawley Economic Growth Assessment (2020)

The NWS Economic Growth Assessment (EGA)² concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA), located within the wider economic areas of the Coast to Capital Local Enterprise Partnership and the Gatwick Diamond. Therefore, the assessment identifies that influential economic linkages also exist with Coastal West Sussex, East Surrey and East Sussex.

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, 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.

Arun Employment Land Needs Update 2016

In support of the adopted Arun local plan 2018 – this study justified the approach to the overall space requirements related to different scenarios range from 31,750sq.m to 123,360sq.m of all types of B Class employment space to 2031, implying in broad terms a need for between 6.9ha and 28.6ha of employment land. However, the Plan allocates circa 75 hectares of employment land in order to provide sufficient flexibility to meet the future needs and aspirations for the District to support the regeneration of Bognor Regis and Littlehampton, support job creation, provide for the needs of modern business, increase the

² Northern West Sussex Economic Growth Assessment (January 2020) Lichfields
<https://crawley.gov.uk/sites/default/files/documents/PUB354687.pdf>

attractiveness of the District as a business location and support the economic development of the coastal market area.

<ul style="list-style-type: none"> • Key objective 	<p>To establish a common understanding of the employment Land requirement and the economic development impact of Covid 19 on the area.</p>
<ul style="list-style-type: none"> • Relevant studies, intelligence or evidence base completed or to do 	<ul style="list-style-type: none"> • Northern West Sussex Economic Growth Assessment (January 2020) • Crawley Focused EGA Update (September 2020) • ADC Employment Land Needs Update (2016) • ADC Defining the HMA and FEMA Greater Brighton and Coastal West Sussex Strategic Planning Board (2017)
<ul style="list-style-type: none"> • Key conclusions from the evidence 	<ul style="list-style-type: none"> • The NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). • Influential economic linkages also exist with Coastal West Sussex, East Surrey and East Sussex. • Defining the HMA and FEMA Greater Brighton and Coastal West Sussex Strategic Planning Board 2017 defines Arun within the Sussex Coast HMA/FEMA (Littlehampton) and within the Chichester and Bognor Regis HMA/FEMA.
<ul style="list-style-type: none"> • Agreement that has been reached or progress made 	<ul style="list-style-type: none"> • The CBC submission Local Plan seeks to meet the most recently identified office and industrial (storage and distribution) needs in their borough. • The adopted Arun Local Plan is contributing towards the unmet employments needs arising within its functional economic area through overall local plan allocations and specific e.g. Bognor Regis Enterprise, Littlehampton and Angmering allocations.
<ul style="list-style-type: none"> • Any further actions / governance requirements etc. 	<ul style="list-style-type: none"> • The authorities will continue to work together with the other West Sussex and Greater Brighton authorities on housing, employment and other strategic issues affecting the wider sub-region.