



Adur District Council / Crawley Borough Council / Worthing Borough Council

Statement of Common Ground



Signatories:

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Dated: 26 May 2023

1. Introduction and Scope

- 1.1 Local Planning Authorities are required by the Localism Act 2011 to meet the 'Duty to Cooperate', that is to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area.
- 1.2 The National Planning Policy Framework and National Planning Policy Guidance sets out the strategic issues where co-operation might be appropriate. In this regard, local planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.
- 1.3 The overall aim is to ensure appropriate co-ordination and planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the councils. This Statement of Common Ground (SoCG) helps to meet this requirement and it should be considered alongside Worthing Borough Council's Duty to Co-operate Statement, which was prepared to support the Worthing Local Plan; the Crawley Borough Council's Duty to Cooperate Statement, which has been prepared to support the draft Submission Crawley Borough Local Plan; and the emerging Adur Local Plan Review. A Duty to Co-operate Statement was also prepared to support the Adur Local Plan 2017.

2. Geographic Context

- 2.1 Crawley, Adur and Worthing are located within the county of West Sussex. Whilst Adur and Worthing adjoin, they do not share an administrative boundary with Crawley, and are separated by the district of Horsham. The South Downs National Park crosses the northern part of Adur and Worthing and the southern part of

Horsham. Crawley and Worthing are the two largest towns by population in West Sussex.

- 2.2 The three authorities are located within the Coast to Capital Local Enterprise Partnership (LEP) Area. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area. The three 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.
- 2.3 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.

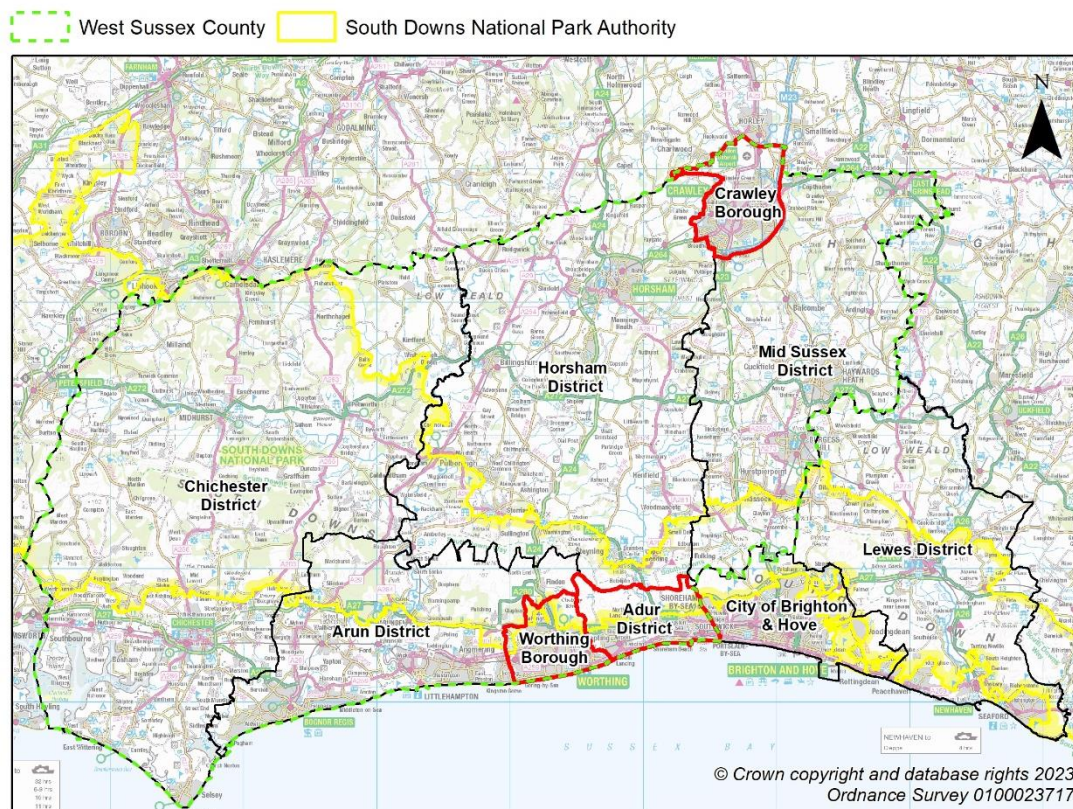


Figure 1: Adur, Crawley and Worthing Local Authority Areas

Adur Context

- 2.4 Adur District is located within West Sussex on the south coast of England, between Brighton & Hove City to the east, and Worthing Borough to the west.
- 2.5 Adur is a relatively small district covering 41.5 square kilometres (sq. km) and has a population of approximately 64,500 (2021 Census), considerably smaller than its neighbouring urban areas.
- 2.6 It is bounded by the South Downs to the north, and the English Channel to the south, with the low-lying land of the Adur Valley between, separating Lancing and Sompting to the west and Shoreham-by-Sea, Southwick and Fishersgate to the east. Over half of Adur District (53%) lies within the South Downs National Park and this area is not covered by the adopted Adur Local Plan 2017 but by the South Downs Local Plan produced by the South Downs National Park Authority.

- 2.7 The whole of the district lies within the Coastal West Sussex and Greater Brighton Housing Market Area.

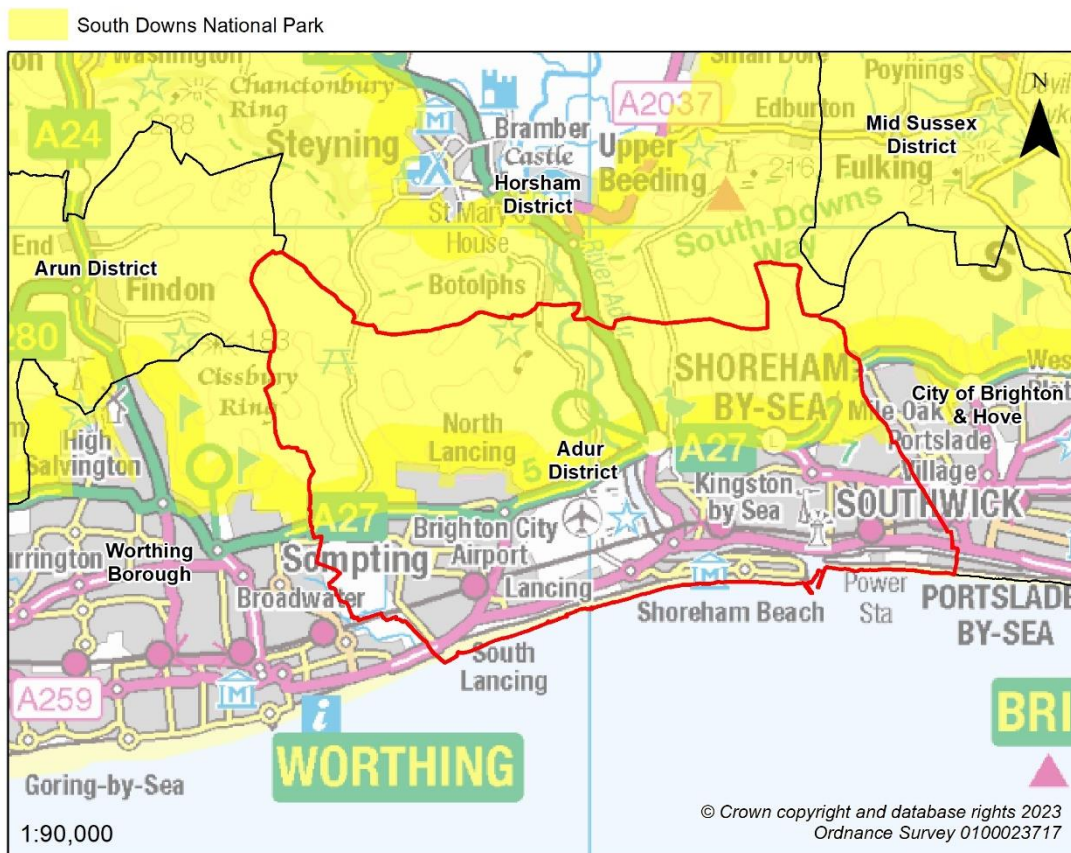


Figure 2: Adur District Council Administrative Area

Worthing Context

- 2.8 Worthing is also located within West Sussex on the coastal plain, immediately adjacent to Adur, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. Whilst being principally a compact urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town.
- 2.9 The borough measures 33.7sq. km in area. However, 8sq. km (24%) of this is taken up by part of the South Downs National Park. Worthing Borough Council is not the planning authority for this nationally important landscape (the South Downs National Park Authority is the relevant authority).
- 2.10 Again, the whole of the borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA).

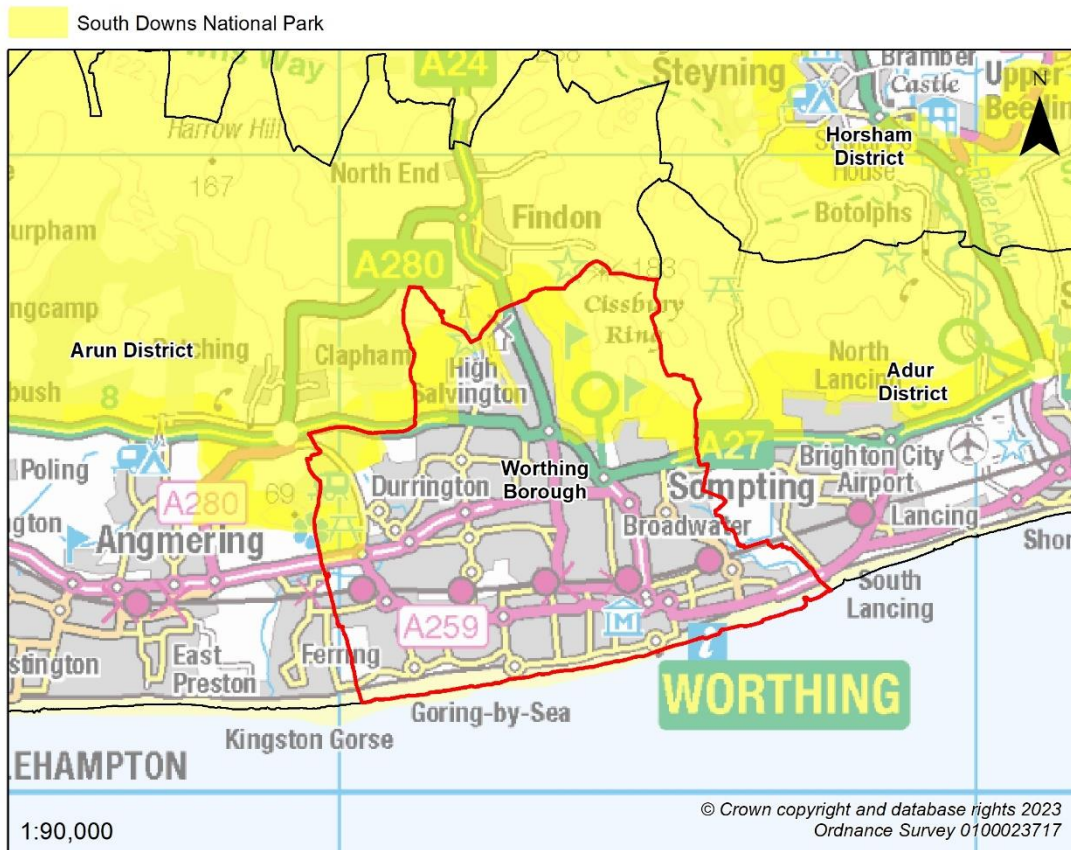


Figure 3: Worthing Borough Council Administrative Area

Crawley Context

- 2.11 Crawley is located to the north eastern part of West Sussex, halfway between London and the south coast. Horsham district abuts the town on the western side, Mid Sussex to the south and east, whilst the county of Surrey lies to the north of the borough.
- 2.12 Crawley borough covers 4,497 hectares (44.97sq. km). Its administrative boundaries are drawn tightly around the town itself, with very little land falling outside of the built up area. The M23 motorway forms the borough boundary to the east/south east. To the south, beyond the M23 and A264 dual carriageway, lies the High Weald Area of Outstanding Natural Beauty. Gatwick Airport is located within the borough to the north of the town – the land between the town and the airport is heavily constrained by aircraft noise and much of it is required to be safeguarded for a future southern runway.
- 2.13 Crawley forms part of the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts. It also lies within the Gatwick Diamond economic functional area, which includes the East Surrey authorities of Epsom and Ewell, Mole Valley, Reigate and Banstead, and Tandridge, in addition to the NWS authorities.

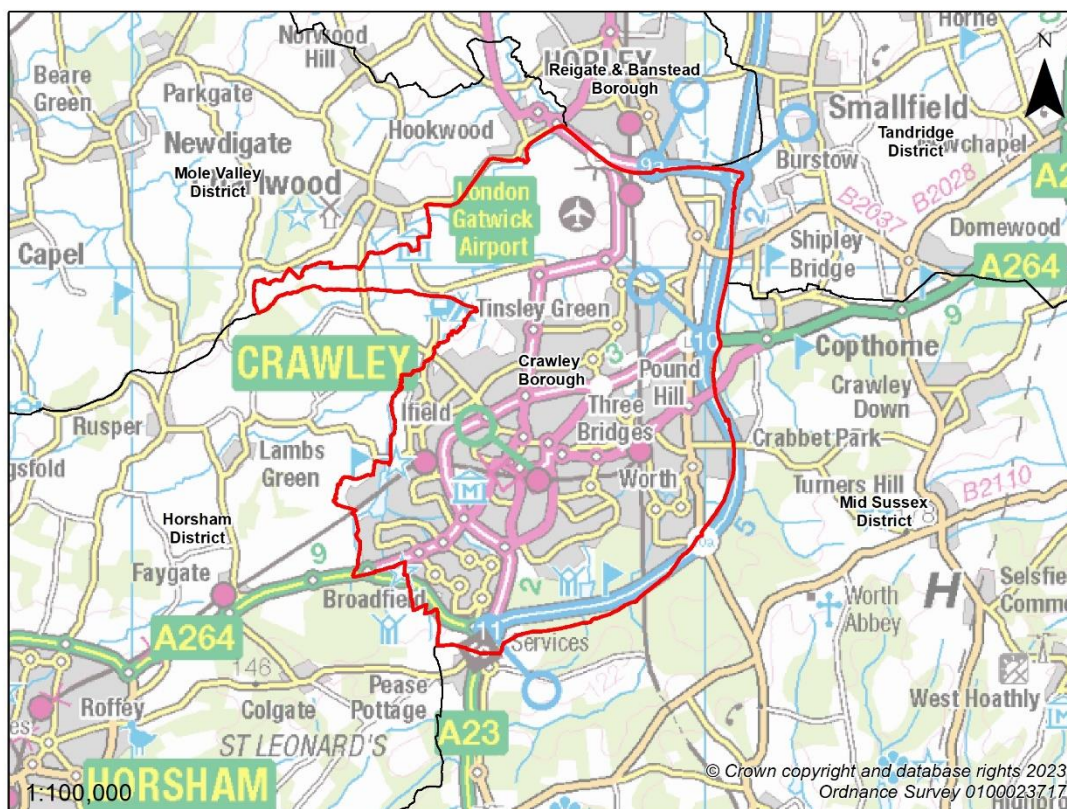


Figure 4: Crawley Borough Council Administrative Area

3. Regional Context

West Sussex and Greater Brighton Strategic Planning Board

3.1 The West Sussex and Greater Brighton Strategic Planning Board (WS&GB) now consists of the following partners:

Adur District Council	Lewes District Council
Arun District Council	Mid Sussex District Council
Brighton & Hove City Council	Worthing Borough Council
Chichester District Council	South Downs National Park Authority
Crawley Borough Council	West Sussex County Council
Horsham District Council	

3.2 The WS&GB consists of lead Council Members, supported by senior officers. Its remit is to:

- Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
- Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.

3.3 The partnership has been working effectively together for a number of years and the first Local Strategic Statement was endorsed by each of the constituent authorities in 2013 (note – at that time the Board did not include Mid Sussex DC, Horsham DC or Crawley BC). In 2014, this version was awarded the Royal Town Planning Excellence Award for Innovative Planning Practice in Plan making.

3.4 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015 (except Crawley Borough Council who were not yet a member of the Board) and is the main vehicle for taking

forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. These priorities reflect the local planning authorities' aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for Local Plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.

- 3.5 Despite having LLS2 in place, all partners have recognised that a full review is required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly address the continuing gap between objectively assessed housing needs and housing delivery in the sub-region and the continuing challenges around supporting sustainable economic growth and infrastructure investment.
- 3.6 To inform the preparation of LSS3 a joint study has been completed called. 'Defining the HMA and FEMA' (GL Hearne, 2017). This work provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.
- 3.7 All WS&GB partners have committed to undertaking the following:
 - Robustly and creatively explore options for meeting the unmet needs (leaving 'no stone unturned') across the Board area and for these options to inform Local Plan reviews;
 - Prepare a Local Strategic Statement 3 covering the period to 2050 with an appropriate level of stakeholder participation;
 - Commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following:
 - a baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;
 - a common methodology for determining the approach to identifying possible locations to meet any unmet need;
 - the capacity of the Board area to absorb further growth;
 - the likely required level of growth;
 - the strategic options available to deliver additional growth;
 - the investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.

Coastal West Sussex

- 3.8 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.
- 3.9 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across this sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively developed coastal strip which falls between the South Downs

National Park and the English Channel. Furthermore, some of the authority areas (including Adur and Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.

- 3.10 These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove where the coastal plain between the downs and the sea is largely already built-up. This is equally true of the coastal and downland part of Lewes District. There are thus few further greenfield development options, coupled with limited brownfield capacity.
- 3.11 The constrained nature of much of the sub-region has been reflected within adopted Local Plans when Inspectors have accepted that Lewes (2016), Brighton & Hove (2016) and Adur (2017) were unable to deliver a level of development to meet their own housing needs.

Northern West Sussex

- 3.12 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. The Northern West Sussex HMA (NWS HMA) centres on Crawley and Horsham, extending south to Haywards Heath and Burgess Hill, to East Grinstead, Horley, west/southwest to Billingshurst and Pulborough.
- 3.13 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 above their objectively assessed housing needs, predominantly to meet Crawley's unmet needs, over the period from 2021 to 2031. 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).

4. Worthing Local Plan (WLP)

- 4.1 Worthing Borough Council recognises the importance of having an up-to-date Local Plan in place that can enable 'local decision making' and guide development that is sustainable, inclusive and resilient. After a number of years of preparation (including regular liaison with local authorities within the sub-region) the council published its Submission draft version of the Worthing Local Plan (WLP) for comment in January 2021. Following Examination, the Worthing Local Plan was adopted on 28th March 2023.
- 4.2 The WLP builds on national guidance to provide for more specific local policies for Worthing to create a high quality environment. Whilst it seeks to plan positively for growth and contribute to sustainable development it has been a very difficult task to balance all the identified needs of Worthing's communities with the scarcity of land within the borough.
- 4.3 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area without merging with the urban

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

areas to the east and west and without damaging irrevocably the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built up area that could deliver significant levels of growth.

- 4.4 The spatial strategy established in the Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 4.5 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (nine previously developed sites and six edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment floorspace over the Plan period. This is a target which is significantly higher than the levels of growth planned for within the Worthing Core Strategy.
- 4.6 Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings.
- 4.7 Whilst acknowledging that this is a very high level of unmet need Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue to work positively to review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

5. Crawley Borough Local Plan (CBLP)

- 5.1 The draft Crawley Borough Local Plan has been published for Regulation 19 Consultation in May 2023. It is anticipated to be submitted for Examination in summer 2023.
- 5.2 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.
- 5.3 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 (2024-2040) of 12,080 dwellings (based on 755 dwellings per annum).
- 5.4 The draft Crawley Borough Local Plan identifies that the borough's land supply allows for almost half of its total housing need to be met on sites within the borough's administrative boundaries: a minimum totalling 5,030 dwellings. This equates to an annualised average of 314dpa.
- 5.5 This leaves a total unmet need figure of 7,050 dwellings (441dpa) to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.
- 5.6 In relation to meeting the housing needs of specific communities, there is 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

42% of its overall housing needs within the borough, even with 40% affordable housing requirement proposed by the draft Local Plan policy, there will be a significant shortfall of affordable housing. In addition, viability evidence has confirmed it is not possible to require 40% affordable housing from town centre residential developments, in these cases the Policy establishes a 25% affordable housing requirement. On this basis, less than 15% of Crawley's affordable housing needs can be met within the borough (108dpa).

- 5.7 Furthermore, as a planned, urban New Town, the potential for opportunities to meet needs of those who wish to Self- or Custom-Build their own home is limited within Crawley borough. Also, the high density nature of the majority of Crawley's anticipated delivery, particularly in Crawley Town Centre, is not often appropriate for Self- or Custom-Builders.
- 5.8 With respect to employment needs, the draft Crawley Borough Local Plan allocates a site to meet Crawley's outstanding employment needs of approximately 13.73ha in a location unsuitable for housing due to its proximity to the airport.

6. Adur District Local Plan

- 6.1 An update of the Adur Local Plan has commenced. This review is likely to cover the period up to 2041.
- 6.2 At the time of writing, the Standard Methodology figure for Adur indicates an annual requirement of 448 dwellings. However, given that the previous Adur Local Plan 2017 met just 53% of identified housing needs due to constraints indicates that it may not be possible for the emerging Adur Local Plan to meet its full requirement. The council is leaving 'no stone unturned' and undertaking rigorous assessment of development opportunities and developing an extensive evidence base to support development of the Plan.
- 6.3 As referred to in paragraph 7.2 below, the government has recently consulted on changes to the planning system. Notwithstanding this, work is continuing on the Adur Local Plan update with an intention to submit by June 2025 under the current Local Plan system. However, if circumstances arise that result in this not being achievable, it will be necessary to adapt the plan and submit under the revised planning system.

7. Other Matters




- 7.1 The government has been consulting on radical changes to the planning system. However, transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. Therefore, the parties are agreed that the emerging Local Plans should continue to be prepared in accordance with current legislation and guidance (see paragraph 6.3 above).

8. Conclusion

- 8.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.
- 8.2 In summary, the parties agree that:
 - a) there are no areas of disagreement between the parties relating to the recently adopted Worthing Local Plan or the emerging Crawley Borough Local Plan and Adur District Local Plan update;

- b) despite significant changes to the planning system being proposed the Adur and Crawley Local Plans should continue to be prepared in accordance with current legislation and in line with their respective Local Development Schemes;
- c) when progressing the Adur Local Plan and Crawley Borough Local Plan, the respective councils have taken a positive approach to development;
- d) given the highly constrained nature of each local authority area, neither area can accommodate the unmet housing needs of the other;
- e) given the levels of housing shortfall acknowledged in the adopted Adur Local Plan (2017) and emerging evidence to support the current Adur Local Plan update, the adopted Worthing Local Plan (2023) and the adopted and emerging Crawley Borough Local Plans (2015 and 2024-2040), the councils should continue to pursue every opportunity to deliver sustainable development and, if possible, where opportunities arise, increase the level of housing delivery over the Local Plan period;
- f) the parties will continue to work expediently and positively together on the areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3;
- g) future work will need to take emerging national policy into account when progressing plans and strategies across the sub-region.

Appendix A: West Sussex and Greater Brighton Authorities

-  West Sussex & Greater Brighton Local Authorities
-  South Downs National Park
-  West Sussex County

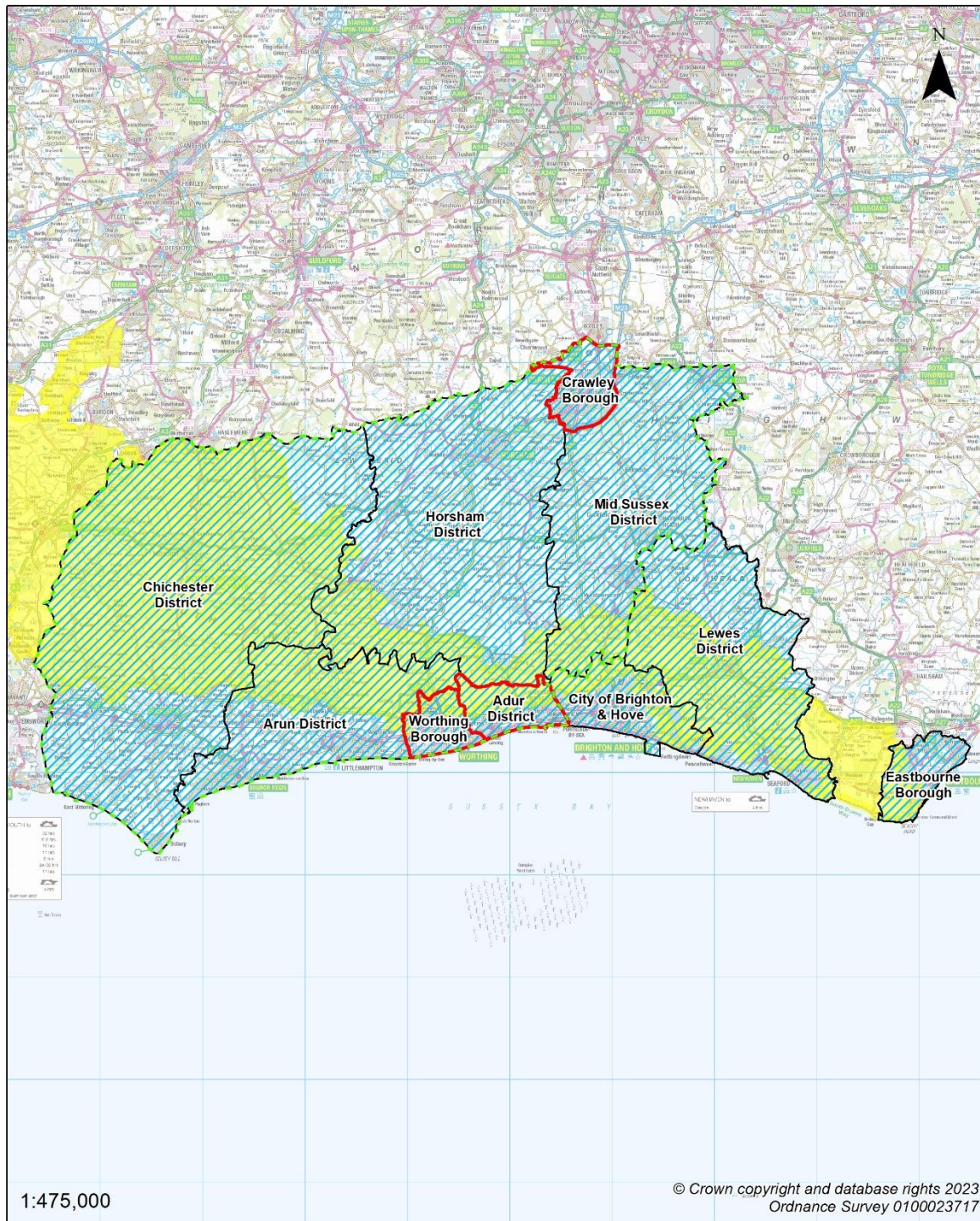


Figure 5: West Sussex and Greater Brighton Authorities Map