

CRAWLEY BOROUGH COUNCIL

LOCAL PLAN REVIEW

# Crawley 2024 – 2040: Duty to Cooperate Statement

Appendix L: Signed Statements of Common Ground

July 2023

## **Appendix L: Signed Statements of Common Ground**

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## Northern West Sussex Statement of Common Ground: July 2023

### 1. List of Parties Involved

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

### 2. Signatories



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### 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 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 for noise and air quality monitoring and 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

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<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.

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:

- 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>, reviewed in 2020<sup>9</sup>, and catchment based flood risk assessments.

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>10</sup>.

#### Adopted Local Plans

The Local Plans for Crawley, Horsham and Mid Sussex were adopted, respectively, in 2015, 2015 and 2018. The Crawley Borough Local Plan underwent a five-year policy review in December 2020 which confirmed it remained up-to-date for Development Management purposes. The Mid Sussex Site Allocations Development Plan Document was adopted in 2022.

The West Sussex Joint Minerals Plan was adopted in 2018, and the Soft Sand Review was adopted in 2021. It covers the period to 2033. The West Sussex Waste Plan was adopted in 2014 and the five-year review in 2019 confirmed that it remained 'relevant and effective' for development management purposes. It covers the period to 2031. The West Sussex Transport Plan was adopted in 2022 and covers the period to 2036.

#### Local Plan Reviews

The Local Plan reviews for Crawley, Mid Sussex and Horsham are in progress, although these are all at different stages.

## 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.

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

<sup>9</sup> Gatwick Sub-Region Water Cycle Study (2020) JBA Consulting  
[https://crawley.gov.uk/sites/default/files/2021-01/Gatwick\\_sub\\_region\\_water\\_cycle\\_study\\_August\\_2020.pdf](https://crawley.gov.uk/sites/default/files/2021-01/Gatwick_sub_region_water_cycle_study_August_2020.pdf)

<sup>10</sup> These include: Strategic Housing Land Availability Assessments; transport modelling; and Gypsy and Traveller Accommodation Needs Assessments.

→ 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, 2016)
- Economic Growth Assessment, CBC, HDC, MSDC (2014)
- Economic Growth Assessment Review, CBC, HDC, MSDC (2019)

Each authority is undertaking focused updates of this evidence with other authority support, where appropriate, ahead of their respective Local Plan submission.

Separately, as part of the DCO process, the authorities are working collaboratively, with Gatwick Airport and other Gatwick authorities<sup>11</sup>, 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:

The Northern West Sussex Housing Statement of Common Ground (2023 or subsequent updates) details the position agreed between the NWS Authorities in relation to meeting housing needs.

#### 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 National Highways.

The Northern West Sussex Authorities have been working jointly, along with Chichester District Council and South Downs National Park Authority, Natural England, Environment Agency and Southern Water to address **water supply** capacity constraints. This is detailed in the Water Neutrality Statement of Common Ground (2023 or subsequent updates), along with evidence study documents (Water Neutrality Strategy Parts A-C, JBA) and the joint Water Neutrality Topic Paper<sup>12</sup>. A joint local plan policy has been agreed and work is ongoing to establish a joint offsetting implementation scheme, led by a joint Water Neutrality Project Manager.

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

<sup>11</sup> WSCC, SCC, ESCC, KCC, CBC, HDC, MSDC, TDC, RBBC, MVDC

<sup>12</sup> Joint Water Neutrality Topic Paper (2023) CDC, CBC, HDC

<https://crawley.gov.uk/sites/default/files/2023-05/9.%20Joint%20Topic%20Paper%20Water%20Neutrality%20May%202023.pdf>

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 has been 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 sewage treatment works: they will not normally grant discharge consents for a private sewerage treatments system where it is more reasonable to connect to a public foul sewer. A review of the Water Cycle Study was commissioned by the authorities, along with Reigate and Banstead Borough Council and published in 2020.

Crawley has a recognised unmet need for **secondary education**. This is identified as amounting to 4 forms of entry (120 places per year group) with two further forms of entry being provided by existing schools within the borough already. This need is in addition to the Gatwick Free School which received permanent planning permission in December 2022 and 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). The further 4 forms of entry of demand for secondary school places is in the short and medium term. In the longer term numbers are expected to plateau 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, the Glynn Learning Foundation. 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 in neighbouring authorities. 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 a combination of permanent and temporary expansions to cater for additional places.

**The parties agree to work together to identify and secure the necessary infrastructure to support growth across Northern West Sussex including:**

- 2. *Transport: including with reference to maximising opportunities for sustainable and active travel: Public Transport – rail station, bus priority and passenger waiting infrastructure alongside bus service network 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 Multi Modal Transport Link Corridor. Transport studies are currently under way to identify transport mitigation strategies for Horsham and Mid Sussex Local Plans. Transport study work for the Crawley Local Plan was completed in summer 2022.***
- 3. *Education – secondary school and wider education needs, to provide for the needs of new communities, and existing latent demand.***



4. **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 Integrated Care System to enhance capacity.**
5. **Water/Waste Water Treatment facility enhancements to respond appropriately to emerging evidence.**
6. **Renewable energy generation to help tackle climate change: cross-boundary infrastructure/measures which will help achieve nationally- and locally-set targets.**
7. **Cross-boundary flood mitigation measures as appropriate.**
8. **Green Infrastructure enhancements such as G.I. network enhancements and corridor improvements across boundaries.**

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

9. **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, HDC 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 additional joint 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
<b>Crawley</b>	Dec 2015	Dec 2020	July 2019	May 2023	July 2023
<b>Horsham</b>	Nov 2015		Feb 2020		
<b>Mid Sussex</b>	Mar 2018	2023	Nov 2022	2023	2023
<b>West Sussex Minerals</b>	July 2018	Five Year Review due July 2023	Not known	Not known	Not known
<b>West Sussex Minerals – Soft Sand Review</b>	March 2021				
<b>West Sussex Waste</b>	April 2014	Five Year Review undertaken May 2019. Next Five Year Review 2024	Not known	Not known	Not known

# Northern West Sussex Housing Market Area

## Statement of Common Ground: Housing Need

July 2023

### 1. Introduction

This Statement of Common Ground has been prepared by the Northern West Sussex Housing Market Area authorities, comprising:

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



Figure 1: Map of Northern West Sussex Authorities

The Northern West Sussex (NWS) Authorities have a long history of joint working and co-operation on strategic cross-boundary matters. The full extent of this is captured within the Northern West Sussex Statement of Common Ground (NWS SoCG)<sup>1</sup>. This was last agreed in 2023 by the above authorities and is kept up to date to support the authorities respective emerging Local Plans. The NWS SoCG also includes West Sussex County Council (all three lower tier authorities are situated within West Sussex County) for cross-boundary matters which fall under their responsibility, particularly transport.

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<sup>1</sup> [https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0011/86546/Northern-West-Sussex-Statement-of-Common-Ground-May-2020.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0011/86546/Northern-West-Sussex-Statement-of-Common-Ground-May-2020.pdf)

Given the particular circumstances regarding housing need and supply impacting this Housing Market Area (HMA), this Statement of Common Ground details the co-operation between the NWS authorities that has actively taken place in seeking to resolve housing matters.

This Housing Statement of Common Ground should be read in conjunction with the NWS SoCG and updates it with respect to housing issues.

It documents the findings of the authorities' respective evidence base (including findings of jointly commissioned evidence studies) and agreed positions of the respective authorities on the following matters:

- Strategic Geography: Definition of the Housing Market Area
- Housing Need: Prioritisation
- Housing Need: Current Position
- Assessment of Housing Supply Options: Site Selection
- Ongoing Co-Operation and Governance

## 2. Strategic Geography: Definition of the Housing Market Area

The definition of the Northern West Sussex Housing Market Area (NWS HMA) is long-standing and has been subject to ongoing review through the authorities' respective evidence bases, including joint studies, and has been confirmed at respective Local Plan examinations.

### Housing Market Area Boundary

The three authorities agree the below Housing Market Area boundaries for the purposes of plan-making, as supported by the evidence base.

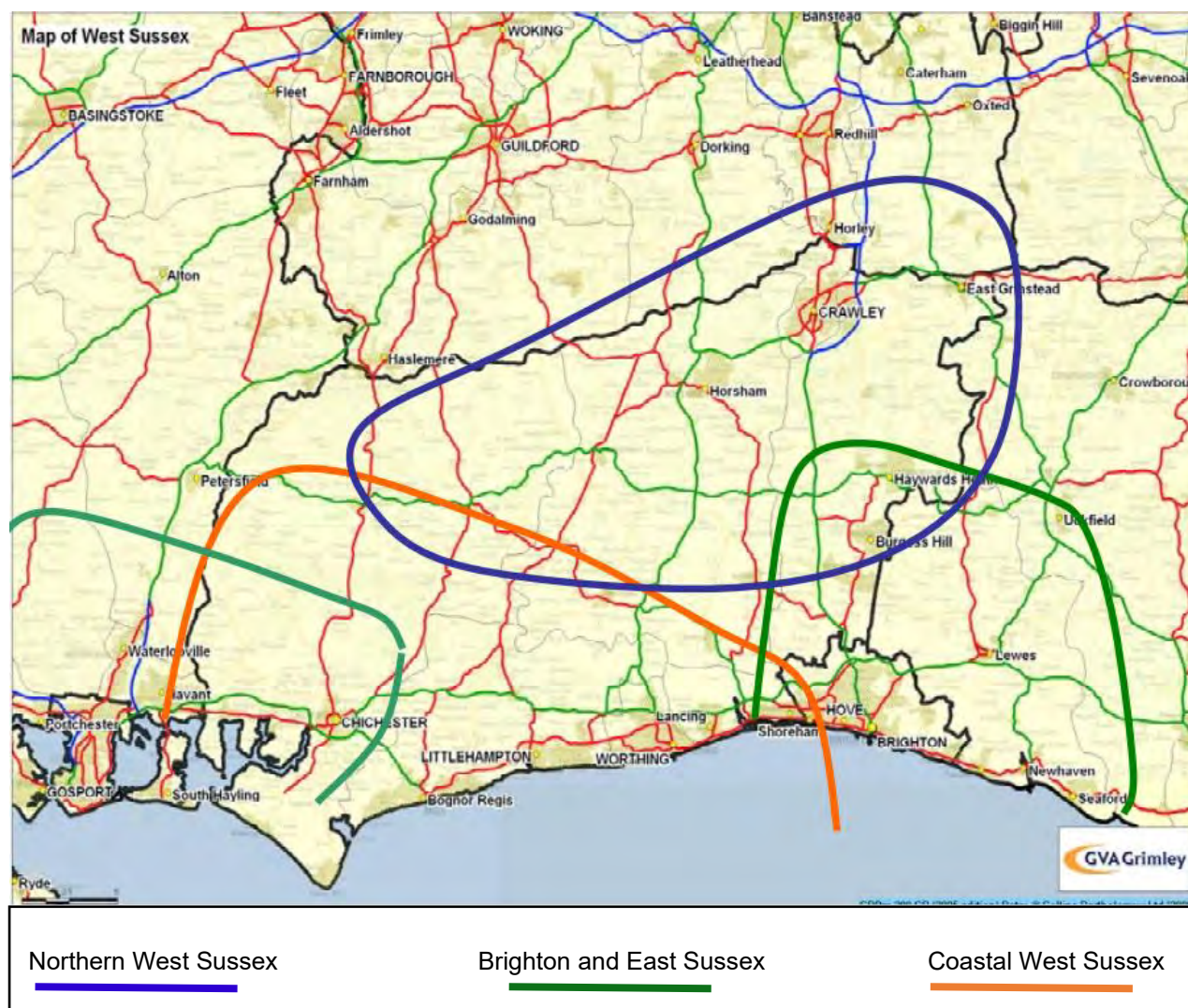


Figure 2: Sussex Housing Market Areas

### Evidence Base

The definition of the NWS HMA has been established in the following evidence base studies:

- **West Sussex Strategic Housing Market Assessment (GVA 2009)**  
This initial Strategic Housing Market Assessment (SHMA) established the Northern West Sussex HMA (NWS HMA) centred on Crawley and Horsham, extending south to Haywards Heath and Burgess Hill, east to East Grinstead, north to Horley and west/southwest to Billingshurst and Pulborough). It identified a 'best-fit' to local authority boundaries as comprising Crawley, Horsham and Mid Sussex. It recognised that there are some overlaps with the Brighton and East Sussex and Coastal HMAs in the

southern parts of Horsham and Mid Sussex. However, the NWS SHMA is the predominant one.

- **Northern West Sussex – Affordable Housing Needs Model Update (Chilmark, 2014)**

This reviewed the conclusions of the GVA 2009 study. It concluded that the NWS HMA continued to represent the primary HMA for Crawley, Horsham and Mid Sussex and that this should form the basis for Local Plans.

- **Housing Market Geographies – Greater Brighton and Coastal West Sussex Strategic Planning Board (GL Hearn, 2016)**

This report was commissioned by the Greater Brighton and Coastal West Sussex authorities (comprising Adur, Arun, Brighton & Hove, Chichester, Crawley, Horsham, Mid Sussex, Worthing and the South Downs National Park Authority) in 2016 to support ongoing work on its Local Strategic Statement. The report confirmed strong links between Horsham, Crawley and Mid Sussex – thereby endorsing the findings of previous studies. It too recognised overlaps in the Horsham and Mid Sussex areas with the Brighton and Coastal HMA.

- **Northern West Sussex SHMA – Crawley and Horsham Update (Iceni, 2019)**

To support Local Plan Reviews, Crawley and Horsham (with input from and engagement with Mid Sussex) commissioned an updated SHMA to review HMA boundaries. It re-confirmed the established position set out in previous studies.

- **Northern West Sussex SHMA – Mid Sussex Update (Iceni, 2021)**

The Mid Sussex SHMA update was completed by the same consultants as the Crawley and Horsham Update and uses the same methodology. Therefore, there is a consistent approach to assessing housing need within the HMA. The Mid Sussex Update endorses the findings of the Crawley and Horsham Update and the conclusion that a Northern West Sussex HMA remains appropriate.

### Local Plan Findings

The three NWS HMA authorities current adopted Local Plans are as follows:

- **Crawley:** Crawley 2030 (2015 – 2030), adopted December 2015
- **Horsham:** Horsham District Planning Framework (2011 – 2031), adopted November 2015
- **Mid Sussex:** District Plan (2014 – 2031), adopted March 2018

The three respective Inspectors examining the above Local Plans have supported the principle of the Northern West Sussex HMA being the primary HMA for each of the three authorities. Despite evidence of overlaps, the Inspectors (in particular, those for Horsham and Mid Sussex) concluded that meeting housing need arising within the Northern West Sussex HMA should be a priority ahead of other overlapping areas.

### Conclusions

The NWS HMA was first established in 2009, comprising Crawley, Horsham and Mid Sussex authority areas. The evidence has been updated on numerous occasions since and reaches the same conclusion – whilst there are overlaps with other HMAs, the predominant HMA for all three authorities is Northern West Sussex. This position has been tested at examination and endorsed by three independent Planning Inspectors.

As all three authorities are progressing with reviews of their Local Plans, the evidence related to HMA boundaries has been recently revisited. However, the same conclusions are drawn.

## Strategic Geography: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree that:

- The evidence regarding Housing Market Area boundaries is robust and fit-for-purpose.
- The latest studies (Crawley and Horsham, 2019 and Mid Sussex 2021) are consistent with each other, and the conclusions are sound.
- The primary Housing Market Area for the three authorities is the Northern West Sussex HMA.
- There are overlaps with the Coast in the southern parts of Horsham and Mid Sussex districts, and with areas in Surrey lying to the south of the M25. However, the evidence points to the NWS HMA being the primary HMA for planning purposes, including the consideration of cross-authority unmet need.

### 3. Housing Need: Prioritisation

Section 2 presented findings that the Northern West Sussex HMA is the predominant HMA, with some overlaps with the Coastal HMA to the south. The NWS HMA authorities agree that this provides a priority order for the purposes of addressing housing need through local plans.

The authorities agree that it is appropriate to establish a priority order, given:

- Firstly, the extent of objectively assessed housing need arising in each individual authority area;
- Secondly, the specific and evidenced circumstances (e.g. environmental and infrastructure constraints) which could limit housing growth;
- Thirdly, the extent to which each authority can meet its own need and any clearly evidenced residual unmet need arising, given the constraints;
- Fourthly, the opportunities to contribute towards unmet need arising in functionally related areas outside the individual authority area.

A priority order has been established. This recognises the fact that contributions towards meeting unmet need arising are likely to be limited and therefore any such contributions towards unmet need should be directed to those most logically and evidentially linked in the first instance.

The authorities agree with the priority order in the text box below as a principle. However, it is recognised that:

- This has been established based on the evidenced HMA boundaries as described in Section 2, rather than with reference to specific sites and their impacts.
- The allocation of specific sites on or very close to non-NWS HMA local authority boundaries may justify an alternative approach to the priority order, however this should be the exception (and justified by evidence) rather than the rule.

For instance, through the site selection process an authority may wish to allocate development within their area on/very close to their administrative boundary. Where there is supply above meeting the host authority's needs, this would most logically (and in sustainability terms) assist firstly with housing need arising the other side of that border. It is therefore recognised by the authorities that, in some cases, this may mean deviating from the established priority order.



## Housing Need Prioritisation: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree that, subject to meeting individual housing needs and establishing that there is potential to assist other authorities with unmet need, assistance should be prioritised as follows:

- **Priority 1: Northern West Sussex HMA.**
- **Priority 2: Coastal West Sussex HMA.**
- **Priority 3: Other adjacent and nearby HMAs where it is justified by each individual authority.**
  - e.g. Surrey authorities (CBC and HDC), East Sussex authorities (MSDC) and, following those, London (all).

It is for each authority to set out how it can meet its own needs and any other authority's needs (or otherwise) through evidence produced through the preparation of their respective local plans.

It is recognised that there may be reason to deviate from the priority order during the process of assessing the most suitable sites for allocation. Deviation from the above priority order will need to be justified by evidence and any implications discussed and considered jointly with the NWS HMA authorities.

## 4. Housing Need: Current Position (March 2023)

### Northern West Sussex HMA – Current Adopted Plans

The current suite of Northern West Sussex HMA Local Plans were adopted as follows:

- **Crawley:** Crawley 2030 (2015 – 2030), adopted December 2015
- **Horsham:** Horsham District Planning Framework (2011 – 2031), adopted November 2015
- **Mid Sussex:** District Plan (2014 – 2031), adopted March 2018

Crawley’s unmet need position was established during its examination. Horsham identified the potential to contribute 150dpa towards this unmet need and this was agreed during the examination of the Horsham District Planning Framework. During the Mid Sussex examination, the Inspector concluded that Mid Sussex could contribute 1,498 dwellings towards unmet need arising in Crawley. Whilst this would leave a remaining 35dpa, the Inspector concluded that this was likely to be met as Crawley’s housing delivery was running slightly ahead of trajectory at that point in time.

Therefore, the NWS HMA authorities have historically been able to demonstrate that the need arising in the HMA could be met in full – based on the agreed Objectively Assessed Needs establishing within each authority’s respective examination. This reflects their positive and on-going engagement to seek cross-boundary strategic solutions.

Table 1: Housing need and supply position at time of Mid Sussex District Plan adoption (March 2018)

	Objectively Assessed Need (OAN)	Total Plan Period OAN	Total Plan Period Housing Supply	Contribution towards NWSHMA (to 2031)
<b>Crawley</b>	675	10,125	5,100	-5,025 (335dpa)
<b>Horsham</b>	650	13,000	16,000	3,000 (150dpa)
<b>Mid Sussex</b>	876	14,892	16,390	1,498 (88dpa)
<b>TOTAL</b>	<b>2,201</b>	<b>38,017</b>	<b>37,490</b>	<b>-527 (35dpa)</b>

### Standard Method

Since the three Local Plans were adopted, the Government has introduced the Standard Method for assessing local housing need.

It is important to recognise that this represents the Standard Method ‘starting point’ for housing need. The extent to which this need can be met will be subject to the three authorities’ assessment of potential supply (i.e. site selection process) which will include consideration of any constraints and mitigations. This is set out further in section 5.

### Housing Need – Comparison to Standard Methodology

Whilst the NWS HMA authorities have been able to meet housing need in full in the past, it is recognised that this is becoming more of a challenge. This is due to:

- Increases in housing need since previous Local Plans were adopted; and
- Supply of sustainable, suitable and deliverable sites reducing.

Applying the Standard Method formula for the three authorities now shows an increased need of **555 dwellings per annum** compared to that established in current adopted plans, an increase of approximately 25%.

Table 2: Standard Method Calculation

	Current Local Plan OAN (dpa)	Standard Method (dpa)	Difference (dpa)
<b>Crawley</b>	675	755	+80
<b>Horsham</b>	650	911	+261
<b>Mid Sussex</b>	876	1,090	+214
<b>TOTAL</b>	<b>2,201</b>	<b>2,756</b>	<b>+555</b>

Therefore, the ability for each of the authorities to meet their own need (before making any consideration of over-supply to meet HMA needs) is becoming more challenging compared to the most recently adopted plans. This is coupled with recent developments related to Water Neutrality which may constrain housing supply within Crawley and Horsham in the short to medium term.

### **Standard Method – Considerations**

Whilst it is not mandatory to use the Standard Methodology for plan making purposes, Planning Practice Guidance is very clear that alternative approaches should only be used in exceptional circumstances and will be scrutinised more closely at examination.

The NWS HMA authorities' SHMAs prepared by consultants ICENI sets out the Standard Method figure and considers whether there are any exceptional circumstances that would justify taking an alternative approach towards setting the starting point. The SHMAs conclude that, based on current guidance (March 2023), there is no justification for deviating from the Standard Method formula or its components in setting the starting point for housing need (noting the housing requirement/supply is assessed separately as discussed above) within this plan period.

### **Gatwick Airport – Future Growth Proposals**

The SHMAs consider whether there are any circumstances by which housing need has been under-estimated by the Standard Method and therefore should be higher. All three authorities' SHMAs consider whether growth funding is in place to facilitate additional growth (such as Housing Deals, City Growth Deals, etc), whether strategic infrastructure improvements are likely to drive an increase in homes needed locally, and the inter-relationship with the assessed need for affordable housing. These are specific circumstances set out in Planning Practice Guidance that could justify increasing housing need to beyond the figures set out by the Standard Methodology.

The SHMAs consider future growth proposals at Gatwick Airport. The airport lies within Crawley borough's administrative area. In July 2019, Gatwick Airport Limited (GAL) confirmed it had started preparing a Development Consent Order (DCO) application to bring the standby runway into use. Should this be successful, it would increase passenger numbers from 46 million passengers per annum (mppa) in 2019, to 75.6 mppa by 2038 and over 80million by 2047.

It is anticipated the DCO will be submitted to the Secretary of State mid-2023 however a decision is not expected until 2024.

The SHMAs consider potential implications, however at this moment in time any implications are unclear and likelihood of the proposals coming to fruition uncertain. The SHMAs conclude that the expansion plans do not justify increasing housing need however this position should be kept under review. It is more likely that this will need to be factored in to the next suite of reviewed plans when the position is clearer.

## Housing Need: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree that:

- The Standard Method figures, set out in Table 1 above, are correct at the time of this SoCG.
- Housing need has increased significantly since the current suite of Local Plans was adopted.
- The ability for each of the three authorities to meet current housing need (both individually and for the primary HMA as a whole) is becoming more challenging, given environmental and infrastructure constraints.
- Consideration has been given to assessing whether an alternative approach could be justified for the starting point for housing need. However, the evidence does not suggest that an alternative approach should be used at this time and there are no circumstances to demonstrate that actual need is higher than the Standard Method indicates.
- Therefore, the Standard Method figures, set out in Table 1 above, are the appropriate housing need figures for the purposes of preparing the NWS HMA respective Local Plans.
- Setting the housing requirement (i.e., the extent to which an authority can meet its housing need) is a separate exercise which will be determined through preparation of the respective Local Plans and informed by the Duty to Cooperate.

## 5. Assessment of Housing Supply Options: Site Selection

There is a long-standing history of co-operation between the three HMA authority areas to understand the options available within each of the respective authority areas to maximise housing supply, the sites with potential to contribute towards this, and the constraints that impact on suitability and deliverability – both cross-boundary constraints and those specific to each authority area individually.

### Site Selection Principles

The three authorities maintain ongoing engagement in relation to the site selection process. Due to individual circumstances (e.g. timescales of plan production, differing constraints, number and typology of sites submitted for consideration) it has not been possible to establish a joint site selection methodology to be used across the three authority areas.

Whilst each authority has its own approach to site selection, there are many commonalities across the HMA. In particular, how each authority has approached the requirements of NPPF paragraph 11 with respect to meeting housing need and demonstrating constraints are common.

The authorities are content that each a) will/have establish a methodology for site selection based on the common considerations below, b) will aim to apply the methodology on a consistent and robust basis and c) are provided with the opportunity to challenge the application of the methodology through ongoing engagement to ensure each authority is maximising housing growth with respect to NPPF paragraph 11.

Whilst these principles are agreed, this does not prejudice the authorities from commenting on the application of any established methodology, or likely impact (both positive and negative) arising from individual sites. However, such comments should be raised at the earliest opportunity through ongoing engagement so that there is ample opportunity to discuss implications, refine conclusions and seek agreements where possible.

### Site Selection: Common Considerations and Constraints

#### Sustainability

The NPPF requires Local Plans to promote a “*sustainable pattern of growth*” (NPPF para 11), and “*be prepared with the objective of contributing to the achievement of sustainable development*”.

For development to be sustainable it needs to be supported by the appropriate infrastructure and services, such as education, health, retail and employment. It should promote the use of sustainable modes of transport (for example, be planned to support new public transport services or located to encourage active travel rather than the use of a car) and seek to protect and enhance the natural environment.

In largely rural districts such as Horsham and Mid Sussex, development that is isolated from existing settlements is unlikely to contribute towards a sustainable pattern of development although this will be assessed on a case-by-case basis through the site selection process. In addition, larger sites may have the potential to deliver on-site infrastructure and services that could enable them to be self-sufficient and deliver sustainable places.

The three authorities agree that the principle of delivering sustainable development, in line with NPPF paragraphs 11 and 16, forms the basis of plan-making and is therefore integrated into their site selection processes and/or documented in Sustainability Appraisals.

#### Environmental Constraints

NPPF paragraph 11b states:

“*Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

*i. the application of policies in this Framework 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 this Framework taken as a whole”*

The authorities’ approach to site selection is based on a common understanding of the constraints to development referred to within paragraph 11b and expanded upon within the NPPF. The authorities agree that sites should not generally be suitable for housing in locations where one or more of the following locations is relevant:

- **Areas of Outstanding Natural Beauty** – great weight should be given to conserving and enhancing AONBs, in accordance with paragraph 177 permission should be refused for major development (as defined by footnote 60) other than in exceptional circumstances.
- **Ancient Woodland** – in accordance with paragraph 180, development resulting in the loss of irreplaceable habitats such as ancient woodland should be refused, unless there are wholly exceptional reasons.
- **Biodiversity** – in accordance with paragraph 180, development on land within or outside a Site of Special Scientific Interest (SSSI) and which is likely to have an adverse effect on it should not normally be permitted unless exceptional circumstances can be demonstrated.
- **Flood Risk** – in accordance with paragraph 159, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. This does not mean that sites with an element of flood risk should be rejected, however it is likely sites significantly affected by flood risk will not be suitable.
- **Heritage** – in accordance with paragraph 199, great weight should be given to heritage asset’s conservation. Where a proposed development will lead to substantial harm (or total loss) consent should be refused. Where less than substantial harm, the harm should be weighed against public benefit.
- **Noise** – Aircraft noise is a particular constraint on noise sensitive development, including housing, in the northern part of Crawley borough, in accordance with NPPF para 185 which states “*Planning policies and decision should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment”*

#### Infrastructure Constraints

Whilst this Statement of Common Ground focuses on housing matters, the Northern West Sussex Statement of Common Ground (2023) identifies the authorities’ agreement on cross-boundary strategic infrastructure. The SoCG identifies constraints which could theoretically limit housing growth, such as transport, water capacity, education and health.

The SoCG identifies mechanisms for the authorities to work together to aim to resolve cross-boundary constraints and therefore aim to maximise housing growth. This includes commissioning of joint studies, the sharing of conclusions reached by individually commissioned studies (e.g. transport modelling) and seeking opportunities to resolve any such issues collectively (e.g. infrastructure provision).

The authorities do, however, recognise that there are specific infrastructure constraints within each individual authority area (i.e. not cross-boundary) which may potentially constrain housing growth. The authorities will share such information, and the measures put in place to attempt to resolve/mitigate such constraints.

### **Engagement to Date**

The three authorities have, and will continue to, engage positively to discuss potential housing supply as the plans progress towards adoption.

For example, as part of the preparation of the revised District Plan (Regulation 18), Mid Sussex engaged with Crawley and Horsham in 2022 on its site selection process. This included consulting neighbouring authorities on the Site Selection methodology and making refinements as necessary, presenting the approach taken and explaining the conclusions and implications (e.g. broad findings from transport and other studies).

Horsham similarly has engaged with the other Northern West Sussex authorities during their Regulation 18 period. This included inviting discussions on site assessments, mostly through the regular NWS group meetings, but also at bilateral discussions with the other NWS authorities respectively.

In addition to engaging directly through similar meetings set out above, Crawley Borough Council published an updated Strategic Housing Land Availability Assessment in February 2023. This includes an updated introduction giving an account of how the council had assessed the 'suitability' of sites for residential development. The updated SHLAA has supported the spring 2023 Regulation 19 consultation on the Crawley Borough Local Plan Review. The Regulation 19 consultation was also supported by an updated Housing Trajectory, Windfall Statement, Housing Supply Topic Paper, and Compact Residential Development Study, providing further explanation of the extent and sources of the borough's projected housing supply.

### **On-Boundary and Cross-Boundary Sites**

There are large sites close to the respective administrative boundaries that are likely to have cross boundary implications due to their scale and/or location. The NWS authorities have a long-standing history of working together on such sites, including the past commissioning of joint studies (e.g. the 'At Crawley' Study) to understand options for on-boundary and cross-boundary growth potential.

The authorities will continue to work together to understand the growth potential, constraints and cross-boundary impacts that could arise from these sites. Should any of these sites be promoted for development within an authority's Local Plan, separate bi-lateral Statements of Common Ground will be prepared to capture points of agreement/disagreement arising.

## Assessment of Options – Local Supply: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree that:

- Each authority has undertaken an assessment of capacity for development within their boundaries, taking account of opportunities and constraints (including cross-boundary) and site suitability and achievability in accordance with the principles established in the NPPF.
- The individual site selection processes will consider sustainability, environmental constraints and infrastructure constraints.
- Authorities will be given the opportunity to scrutinise and comment on each other's methodologies and high-level outcomes through ongoing engagement at the earliest opportunity, in addition to and without prejudice to each LPA's statutory consultee roles as part of the formal plan-making stages.
- On-boundary and Cross-boundary sites may be subject to more detailed engagement and common and uncommon ground will be captured in separate (likely bilateral) SoCGs.
- Cross-boundary engagement processes have, to date, been satisfactorily undertaken and will continue.
- The work of each respective authority has been carried out diligently and there is broad cross-authority support for the principles underpinning the respective site assessments.
- It is for the respective authorities to demonstrate through examinations in public whether appropriate conclusions have been reached on these matters.



## 6. Ongoing Co-Operation and Governance

As described in Section 1, the three HMA authorities have produced a Northern West Sussex Position Statement (NWSPS) which captures the full suite of agreed cross-boundary matters. This Statement of Common Ground focusses on Housing Need given its importance and the significant co-operation on this matter.

The three authorities are currently at different stages of Local Plan Review preparation. At the time of writing, the current published timetables for the three authorities are as follows:

*Table 3: Local Plan Review Timetables*

	<b>Regulation 18</b>	<b>Regulation 19</b>	<b>Submission</b>	<b>Examination</b>	<b>Adoption</b>
<b>Crawley</b>	July/Sept 2019	Jan/March 2020 Jan/June 2021 May/June 2023	July 2023	Autumn 2023	Spring/Summer 2024
<b>Horsham</b>	Jan/March 2020	TBC	TBC	TBC	TBC
<b>Mid Sussex</b>	Nov/Dec 2022	Aug/Sep 2023	December 2023	February 2024	Summer 2024

This Statement of Common Ground has been prepared to capture the position on housing need (i.e., the Standard Method) and supply (i.e., proposals in draft plans) at the time of writing. As the Standard Method is updated annually, and draft plans emerge, the position related to housing need within the HMA may change. Therefore, this SoCG will be reviewed as appropriate to ensure it captures the latest position.

### **Changes to National Policy**

In December 2022, the Government commenced a consultation on “Levelling-up and Regeneration Bill: reforms to national planning policy”. This re-iterates the Governments objective of achieving delivery of 300,000 homes per year but also sets out proposed changes to the NPPF which could impact on authorities’ application of the Standard Method (to establish the ‘starting point’) and circumstances which could justify a reduced housing supply. At the time of writing, the government is considering the responses received. A revised NPPF is awaited (scheduled for publication in September 2023 at the earliest) – implications for the NWS HMA authorities will not be clear until this is published. Dependant on the outcome and any change to national policy, a revision to this SoCG may be required to capture any further implications.

### **Ongoing Engagement**

The three authorities have been meeting on an on-going, regular basis as each of their Local Plan Reviews progress. This has enabled each authority to understand the current position in relation to housing supply and the ability (or not) for each authority to meet its own needs and (where possible) increase supply to assist with meeting unmet need in accordance with the priority hierarchy. The authorities have considered options for increasing supply, as well as the outcomes from wider sub-regional groupings (such as the Coastal West Sussex and Greater Brighton group preparing Local Strategic Statement 3). This co-operation will continue.

## Ongoing Co-Operation and Governance: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree:

- This Statement of Common Ground captures a 'point in time' and that it will be reviewed and kept up to date as Local Plan Reviews progress.
- To meet regularly to discuss matters as they emerge and take opportunities to find solutions to maximising housing supply within the HMA area and that any conclusions should be evidence based.
- To continue membership and positive involvement with sub-regional groupings such as the Gatwick Diamond and West Sussex and Greater Brighton, including in relation to the preparation of West Sussex and Greater Brighton Local Strategic Statement (LSS) 3.
- This statement is agreed by all parties without prejudice to their respective ability to make representations to each other's emerging Local Plans, albeit these representations will respect the 'Points of Agreement' reached within this SoCG.
- This Housing SoCG will be updated (if required) once the evidence base is refined and more definitive conclusions can be reached on housing need and supply within the HMA.


## 7. Statement of Common Ground – Signatories



Clem Smith  
Head of Economy and Planning, Crawley Borough Council



Barbara Childs  
Director of Place, Horsham District Council



Sally Blomfield  
Assistant Director – Planning and Sustainable Economy, Mid Sussex District Council

## Sussex North Water Resource Zone Statement of Common Ground – Water Neutrality

### 1. Parties to the Agreement

1.1 This Statement of Common Ground has been agreed between the following signatories:

- Chichester District Council
- Crawley Borough Council
- Horsham District Council
- Mid Sussex District Council
- South Downs National Park Authority
- West Sussex County Council

It has also been endorsed (see Appendix 1) by:

- Southern Water
- Natural England
- Environment Agency

1.2 Individual representatives of these organisations are listed in the Signatories section of this Statement.

1.3 As a consequence of Natural England’s Position Statement for Applications within the Sussex North Water Resource Zone (published on 14 September 2021), all of the signatories understand the need for development to demonstrate water neutrality in the Sussex North Water Resource Zone (WRZ) and agree or endorse the approach set out below. The Sussex North Water Resource Zone (WRZ), as defined in section 3 of this Statement of Common Ground and Appendix 2, is supplied by drinking-quality water initially sourced from a groundwater abstraction point in Pulborough. Natural England has advised that this abstraction cannot be ruled out as having a negative impact on the wildlife sites in the Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site. They have advised that any new development that takes place must not to add to this adverse effect and one way of achieving this is to ensure that all new development which takes place is water neutral.

1.4 Further background to the need for water neutrality in the WRZ is set out in the Joint Topic Paper: Water Neutrality.

## 2. Purpose of this statement

- 2.1 This statement evidences a joint commitment by all signatories to ensuring water neutrality in the WRZ.
- 2.2 The statement sets out the agreed geographical boundary for the WRZ within which water neutrality is to be maintained (Section 3 and Appendix 2). It then provides the agreed joint working arrangements and sets out agreed principles and responsibilities to the ongoing management of water neutrality within the Sussex North WRZ.

## 3. Geographical context – Sussex North Water Resources Zone

- 3.1 The Sussex North WRZ covers a large area within northern West Sussex, including almost the entirety of the administrative boundary of Horsham District Council, the north east part of Chichester District Council, a significant part of Crawley Borough Council, and a small portion of Mid Sussex District Council. Some of the area is also located within the boundary of South Downs National Park Authority. West Sussex County Council is the relevant upper tier authority for all these areas.
- 3.2 The extent of the area (Appendix 2) has been determined by Southern Water and accepted by Natural England as the area within which water neutrality is required for new development.
- 3.3 It is possible that the WRZ boundaries could alter to reflect the activities of Southern Water (for instance, the rezoning of customers to other water resource zones so that they receive water from alternative water sources). Should this occur, it is agreed that this information will be communicated by Southern Water to all parties so that any necessary updates can be made.

## 4. Agreements between the parties

### *Principal objective*

- 4.1 The signatories agree that they will use their respective powers as necessary to achieve water neutrality with respect to new development. The Local Planning Authorities, though at different stages of plan preparation, are preparing Local Plans to identify areas of development within the context of the need to achieve water neutrality over the relevant plan periods. In any case, water neutrality will need to be achieved until such a time that Southern Water implement measures to supply water requirements without adverse impacts on designated sites. This is likely to be implemented within the various Local Plan periods. The signatories commit to maintaining a dialogue to understand when a strategic solution

will come forward as an alternative to abstraction at Pulborough. The work of the individual signatories will be progressed in a strategic and coordinated manner.

#### *Governance*

- 4.2 Reports on key water neutrality matters are taken to the Water Neutrality Executive Board for their consideration and recommendations. This consists of senior representatives of the signatories to this statement, as well as representatives from DEFRA<sup>1</sup>, DLUHC<sup>2</sup> and Ofwat. The Executive Board is supported by a Water Neutrality Lead Officer Group, who in turn are supported by smaller and more focused working groups. All of these are coordinated by the Water Neutrality Project Manager which is a joint post between Horsham District Council, Crawley Borough Council, Chichester District Council, West Sussex County Council and the South Downs National Park Authority.

#### *Evidence*

- 4.3 Chichester District Council, Crawley Borough Council and Horsham District Council, with the input from all signatories to this Statement of Common Ground, have developed a shared evidence base to support a joint approach to water neutrality and help progress the respective Local Plans. Details of this technical evidence base are set out in the Joint Topic Paper: Water Neutrality. A key element of this is an appraisal of water supply offsetting measures, which are necessary to enable water neutral new development.
- 4.4 Given that the WRZ crosses administrative boundaries, the different bodies involved have different regulatory roles and cumulative development impacts must be taken into account, the evidence base stresses the importance of working together across the whole of the WRZ. The signatories agree that they have worked collectively and proactively to address issues relating to the need for water neutrality in the WRZ. The signatories agree to continue to work together and with other authorities and bodies, as necessary to deliver and implement water neutral plans and development.
- 4.5 It is agreed that the evidence base is up to date and considered sufficient at the point of publication to support the joint policy as outlined below and to support the development of the water offsetting scheme. The signatories to this Statement of Common Ground agree to communicate with each other to identify if any further evidential work is needed.

#### *Joint policy approach*

- 4.6 The water neutrality evidence base identifies a need to have a shared policy approach to ensure consistency in plan-making and decision-taking across the WRZ. It recommends that a joint water offsetting scheme is established for development proposals to utilise to demonstrate water neutrality. These findings have been accepted by the Executive Board.

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<sup>1</sup> Department for Environment, Food and Rural Affairs

<sup>2</sup> Department for Levelling Up, Housing and Communities

- 4.7 Accordingly, a joint model local plan policy has been drafted to ensure consistency across the WRZ with respect to water neutrality. All relevant signatories agree to including a policy in their emerging Local Plans which closely reflects the model policy, albeit worded to reflect specific local circumstances. Southern Water, Natural England and the Environment Agency confirm their support for the joint policy.

*Joint mitigation of new development*

- 4.8 It is agreed that work on a water offsetting scheme will be prioritised and appropriately resourced by all signatories. This is detailed in section 5 of this Statement of Common Ground.

5. Statement of Intent (ongoing work)

- 5.1 The focus of future water neutrality work is the establishment and deployment of a joint water neutrality offsetting scheme within the WRZ which can be accessed by developers to demonstrate that their proposals are water neutral and enable them to come forward. Developers will still be able to utilise other offsetting measures, should they choose to do so. The Water Neutrality Project Manager is progressing this work. As a priority, further opportunities to fund the development and implementation of the water offsetting scheme will be explored by all signatories with a responsibility over water supply infrastructure and enabling new development.
- 5.2 The signatories to this Statement of Common Ground recognise that the offsetting scheme will involve the exchanging and storing of appropriate information and data relating to planning applications and water offsetting measures. Much of this will be held by statutory providers of infrastructure or by Government agencies. All signatories agree to supply up to date and accurate information as necessary and in good time. The signatories also agree that any data sharing and processing will be done in accordance with applicable data protection law.
- 5.3 Each signatory agrees to provide information pertinent to water neutrality as per the reasonable requests of other parties and with any agreed timescales and data protection law. Such requests may arise from statutory or legal processes (for example, planning applications, Habitat Regulations Assessments, and other environmental assessments) or for non-statutory tasks supporting the ongoing management of water neutrality within the WRZ.

## 6. Signatories

6.1 The undersigned agree at the time of signing to the above statement. It is understood and agreed between the parties named below that the statement may be reviewed as appropriate and on reasonable request of any of the signatories to it.

Andrew Frost Director Planning & Environment Chichester District Council		Dated: 25.07.23
Clem Smith Head of Economy and Planning Crawley Borough Council		Dated: 20.07.23
Barbara Childs Director of Place Horsham District Council		Dated: 20.07.23
Sally Blomfield Assistant Director – Planning and Sustainable Economy Mid Sussex District Council		Dated: 25.07.23
Tim Slaney Director of Planning South Downs National Park Authority		Dated: 21.07.23
Michael Elkington Head of Planning Services West Sussex County Council		Dated: 20.07.23



## Appendix 1: Stakeholder Statements of Endorsement / intent

### **Environment Agency (Solent & South Downs / Kent & South London)**

The Environment Agency (Solent & South Downs area & Kent and South London area) endorse the principles set out in this document, including attending the Water Neutrality Executive Board and sharing information in a timely manner upon reasonable request (subject to any relevant legislative provisions such as the Environmental Information Regulations 2004).

The matters set out in this document are without prejudice to the Environment Agency's powers and discretions. The above endorsement may be withdrawn after having given reasonable notice to the signatories.

### **Natural England**

Natural England (Kent and Sussex area team) endorse the principles set out in this document, including attending the Water Neutrality Executive Board and sharing information in a timely manner upon reasonable request (subject to any relevant legislative provisions such as the Environmental Information Regulations 2004).

The views set out in this document are without prejudice to the proper exercise by Natural England of its powers and duties. The above endorsement may be withdrawn after having given reasonable notice to the signatories.

### **Southern Water**

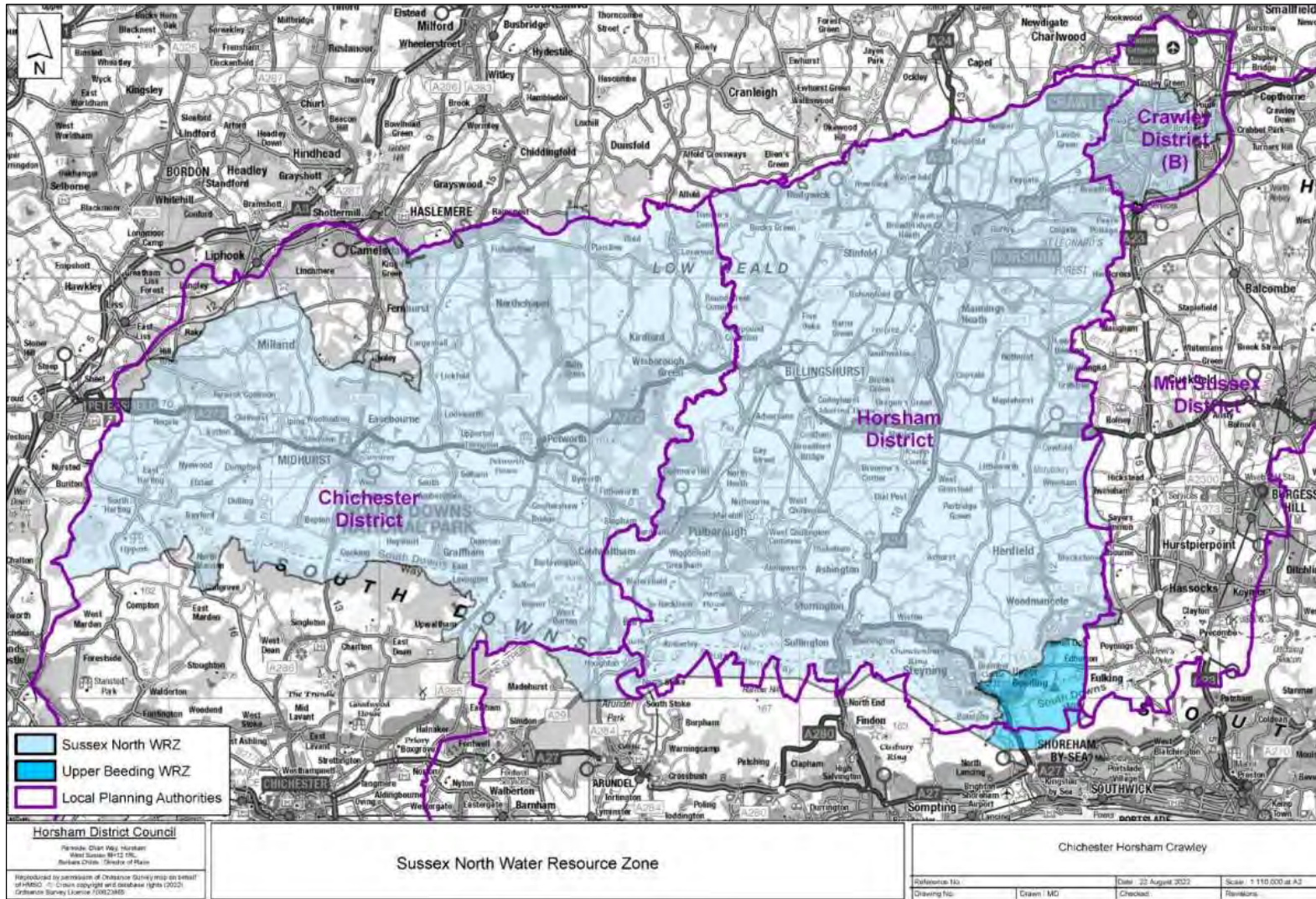
Southern Water continues to be a key part in the ongoing activities on Water Neutrality, working to support all of our customers within the Sussex North Water Resource Zone, the key local authorities, Natural England and the Environment Agency. Southern Water endorses the principles set out in this document including attending the Water Neutrality Executive Board and sharing information in a timely manner upon reasonable request, whilst in accordance with the relevant data protection laws and any other relevant legislative provisions such as the Environmental Information Regulations 2004.

As regards paragraph 4.1, Southern Water confirms that it will maintain a dialogue with the signatories in terms of its strategic solution coming forward and its abstraction at Pulborough, but wish to make clear that whether or not the abstraction continues is not dependent on the strategic solution and involves various other factors as well.

As regards paragraph 5.1, Southern Water wishes to make clear that whilst it endorses this SoCG, it is not a signatory, and therefore this paragraph should be viewed in this context.

The matters set out in this document are without prejudice to Southern Water's statutory powers and discretions. Southern Water reserves the right to amend or withdraw its endorsement of the principles contained within this document upon providing reasonable notice to the signatories.

Appendix 2: Map of Sussex North Water Resource Zone



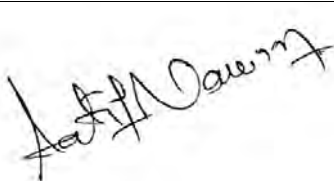
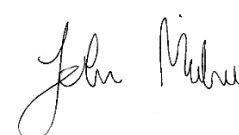
## Horsham / Crawley Statement of Common Ground

### Horsham Local Plan

### Crawley Local Plan Review: Regulation 19

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#### Signatories:

Atif Nawaz, Cabinet Member for Planning and Economic Development, Crawley Borough Council	John Milne, Cabinet Member for Planning and Development, Horsham District Council
	

#### Statement

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#### 1. Introduction and Scope

1.1 The purpose of this statement is to document the strategic cross-boundary matters that have been or are being addressed jointly by the parties, as necessary to demonstrate effective joint working, or to draw out areas of common ground that are specific or unique to the parties.

1.2 It also draws out areas of disagreement, and identifies what measures are being taken to address these.

1.3 The matters dealt with in this statement are:

Section 2: Local Plan periods and governance

Section 3: Housing need

Section 4: Gypsy and Traveller Accommodation

Section 5: Employment – strategy and sites

Section 6: Settlement hierarchy

Section 7: Strategic growth West of Crawley

Section 8: Gatwick Airport

Section 9: Education

This statement has been produced in preparation for the Submission of the Crawley Borough Local Plan Review and to support the Horsham District Local Plan. It is anticipated that this statement will be updated to relate to later stages of the Local Plans and changes in circumstance.

## 2. Local Plan periods and governance

2.1 Figure 1 below indicates anticipated Local Plan timescales and periods at the time of drafting this agreement. Note that timescales are subject to change to take reasonable account of circumstances.

Figure 1: Overview of Local Plan timescales

	<b>Crawley Borough Local Plan Review (2024 – 2040) Timetable</b>	<b>Horsham District Local Plan Review Timetable (to be advised)</b>
Overview & Scrutiny Commission	31 January 2023	n/a
Cabinet	1 February 2023	
Full Council: Approval of Publication & submission	22 February 2023	
Statutory public consultation period: Publication (Submission) consultation	9 May to 20 June 2023	
Submission	Summer 2023	
Examination hearings	Autumn 2023	
Adoption	Spring/Summer 2024	

2.2 The councils have a strong track record of constructive joint working with effective outcomes. This includes the direct delivery of a new neighbourhood immediately adjacent to Crawley within Horsham District’s administrative area (Kilnwood Vale), which is now being built out, following the preparation and adoption of the West of Bewbush Joint Area Action Plan Development Plan Document 2009 (JAAP DPD). The authorities work effectively together across the Northern West Sussex Housing Market Area, which has secured continual updates of the Northern West Sussex Position Statement and Statement of Common Ground (CBC, HDC, Mid Sussex District Council and West Sussex County Council)<sup>1</sup>. This achieved meeting in full the housing need for the Housing Market Area in the existing round of adopted Local Plans. The Northern West Sussex Statement of Common Ground is in the process of being updated, along with a separate Housing-specific related Statement of Common Ground agreed between the three district/borough authorities (July 2023).

2.3 Work on specific strategic matters critical to the two parties (HDC and CBC) also includes detailed discussions at Member and Officer Level on key cross-boundary matters including how to address unmet housing need and consideration of the potential for strategic scale development. This includes Homes England’s long term proposals for up to three new neighbourhoods located to the west of Crawley and the possible provision in the longer term of new railway stations between Crawley and Horsham on the Arun Valley Line. Appendix B provides the details of the most

<sup>1</sup> 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>

relevant strategic planning and cross boundary meetings held between the two authorities since the adoption of the 2015 Crawley and Horsham Local Plans.

- 2.4 Other work includes jointly commissioning numerous evidence documents (the most recent of these are set out in Appendix A) to ensure a common understanding of the wider sub regional position and to ensure these issues can be taken account of during our plan making. Other discussions include those concerning the Gatwick Diamond Authorities<sup>2</sup> and the West Sussex and Greater Brighton Strategic Planning Board.

### 3. Housing need

- 3.1 Through the signed Statement of Common Ground for the Northern West Sussex Authorities (May 2020)<sup>3</sup>, and its emerging Housing-specific Statement of Common Ground, 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 (HMA).
- 3.2 Figure 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 an indicative overall deficit of 527 dwellings (equal to 35 dwellings per year over the 15 year Crawley Plan period).

Figure 2: Overview of current supply positions (Adopted Local Plans)

	<b>Crawley</b>	<b>Horsham</b>	<b>Mid Sussex</b>	<b>NWS HMA total</b>
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) <sup>5</sup>	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)

- 3.3 Figure 3 establishes the future local housing need (calculated using the current standard method formula) identified for the Northern West Sussex Housing Market Area as progressing through the Local Plan Reviews. It is recognised that the standard method requires updating until the point of

<sup>2</sup> Gatwick Diamond LSS: <https://crawley.gov.uk/sites/default/files/documents/PUB344429.pdf>

<sup>3</sup> Northern West Sussex Statement of Common Ground (see Footnote 1)

Local Plan submission as updated household growth projections and affordability data are released. The information in Figure 3 will be completed when the Horsham Regulation 19 consultation begins.

Figure 3: Overview of future need and supply

LPA	Local Housing Need*	Local Plan target	Plan status	Plan period
<b>Crawley</b>	755 dpa	400 dpa (yrs 1-5) 360 dpa (yrs 6-10) 205 dpa (yrs 11-16)	Regulation 19 Proposed Submission	2024-2040
<b>Horsham</b>	911 dpa	Work to understand potential delivery target ongoing	Regulation 18	anticipated 2023 -2040
<b>Surplus/Deficit</b>	-	tbc (yrs 1-5) tbc (yrs 6-10) tbc (yrs 11-16)	-	-

\*The Standard Method for calculating Local Housing Need has been used.

- 3.4 Housing need within Crawley has been calculated through the Standard Method as totalling 755 dwellings per annum (dpa). Over the Crawley Borough Local Plan period (2024 – 2040) this equates to 12,080 dwellings. Due to the land constraints associated with the borough, the draft Crawley Local Plan Review proposes a total supply-led figure for the whole Plan period of 5,030 dwellings, leaving an outstanding unmet need of 7,050 dwellings over the same period. This is not anticipated to come forward as a flat trajectory, and therefore the draft Crawley Borough Local Plan sets a stepped housing requirement figure rather than as a simple annualised average. In light of this unmet need, Crawley Borough Council wrote to HDC in January 2020 and in April 2023 to request whether Horsham District Council is able to assist in contributing to these unmet needs.
- 3.5 As of March 2023, annual housing need within Horsham has been calculated through the Standard Method as totalling 911 dwellings per annum (dpa). Along with existing commitments, Neighbourhood Plan allocations and an allowance for windfall development, HDC would seek to meet this need by allocating sites in its forthcoming Local Plan.
- 3.6 Since the receipt of the initial request as to whether HDC could accommodate any of Crawley’s unmet needs, matters relating to the Habitats Regulations and impact of water supply abstraction on protected Habitats arose. This created a significant delay in the progression of the Local Plans and also in the permission of new developments across both authority areas. Despite the delays to the Local Plans, discussions and evidence base updates have continued to be undertaken to establish the extent to which Crawley can deliver housing within its own boundaries. In addition, Horsham District Council has prepared a range of evidence base documents to support the preparation of its own plan, to examine the extent to which it could accommodate housing needs.
- 3.7 The Northern West Sussex authorities agree<sup>4</sup> that, subject to meeting individual housing needs and establishing that there is potential to assist other authorities with unmet need, assistance will be prioritised as follows:

<sup>4</sup> Draft Northern West Sussex Housing Needs Statement of Common Ground (July 2023)

- Priority 1: Northern West Sussex HMA
- Priority 2: Coastal West Sussex HMA
- Priority 3: Other adjacent and nearby HMAs where it is justified by each individual authority.

3.8 The HDC evidence base work has not yet been completed and the extent to which the Council can meet housing needs cannot at this point in time be finalised but HDC can confirm that the prioritisation identified in the NWS HMA Position Statement will be used should it be able to meet unmet needs of other authorities, such as CBC. The anticipated housing supply to be met across the two authority areas through the revised Local Plans, over the Plan periods, will be confirmed when the Horsham Local Plan is published for its Regulation 19 consultation.

3.9 The parties agree the above approach forms the most effective and positive approach to the consideration of meeting unmet needs within the shared primary housing market area, taking into account local constraints, the need to resolve environmental and infrastructure constraints, and the need for sustainable development.

*Affordable Housing:*

3.10 The Strategic Housing Market Assessment highlighted an affordable housing need emerging from Crawley of a total of 739 dwellings per year. Even if the council could secure 40% affordable housing for all residential developments across the whole borough, due to the supply constrained housing requirement position, this would only meet 17% of the overall affordable housing needs of the borough (126dpa). This leaves a substantial amount of unmet affordable housing need (606dpa).

3.11 However, critically, viability evidence being prepared to support the draft Crawley Borough Local Plan is highlighting the challenges in securing 40% for high density schemes in Crawley town centre (due to high existing land values and high costs for high rise development), leading to a reduction in the levels of affordable housing which can be required through such private market led schemes. The draft Crawley Borough Local Plan is proposing a 25% affordable housing requirement from such schemes within the town centre location. This reduces the amount of the affordable housing need being met within the borough to 15% (108dpa) when taking known schemes into account (i.e. not counting windfalls, of which the highest number are anticipated to come forward within the town centre). Furthermore, the affordable housing calculation in 3.10 above does not take into account the national threshold of less than 10 dwelling schemes not requiring affordable housing because the Submission Crawley Local Plan requires affordable housing from all residential development, given the level of need. Should this threshold be required in the policy, it is likely that there will be an even larger affordable housing unmet need arising from Crawley.

3.12 The most recent available evidence (Social Rented Housing and First Homes Study, Sep 2022) has shown a need for 492 affordable homes per year in Horsham. The emerging HDLP will set an appropriately ambitious target whilst ensuring development is viable. This target is however anticipated to yield well below the identified need for Horsham District.

3.13 The parties agree to consider and maximise opportunities to address affordable housing needs and appropriate housing mix as evidenced through the joint SHMA and any subsequent updates, subject to viability, particularly, but not restricted to, where development may take place adjacent to Crawley. Whilst the full need cannot be met through planning policies and Section 106 Agreements (as outlined above), both authorities are proactively seeking to maximise supply in other ways, for

example through Horsham District Housing (HDC's affordable housebuilding company), Crawley Borough Council's own housing delivery schemes, and facilitating schemes led by housing associations.

#### *Self- and Custom-Build:*

3.14 Due to Crawley's predominantly urban nature, with a high proportion of higher density residential schemes proposed, and the limited area of land outside the existing Built-Up Area Boundary, with the exception of the land affected by aircraft noise constraints, there are limited opportunities for self-build to take place within the borough's administrative boundaries. The current number of individuals and groups on the council's Self- and Custom-Build Register is 90; of which 73 are Part 1 entries (i.e. those which satisfy local eligibility criteria) and a further 17 are Part 2 entries.

3.15 The HDLP is likely to include a policy requirement to provide a supply of units as self-build or custom-build plots. This may result in a supply which is greater than the number of entries on the Horsham self-build register at the current time, however this is uncertain given the fluctuating nature of the register.

3.16 The parties acknowledge that those with a desire to self-build in the area will be able to register with the relevant authority subject to local eligibility criteria. The parties therefore agree that the outcomes of emerging policies will be monitored and policies reviewed in future if appropriate.

#### **4. Gypsy and Traveller Accommodation**

4.1 The parties agree that there is an assessed need for 93 gypsy and traveller pitches to be provided additional to those existing in Horsham during the Horsham District Local Plan period, and that the equivalent need in Crawley Borough is currently assessed as zero. A reserve site for up to 10 pitches is allocated at Broadfield Kennels, southwest of the A264, in the adopted Crawley Borough Local Plan in anticipation of a future need being identified in Crawley. The Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment is being updated as part of the Crawley Local Plan Regulation 19 consultation.

4.2 HDC is undertaking an update to its GTAA to understand the need for pitches and plots, which is likely to be finalised later in the year. Currently, HDC is not in a position to know whether it is able to meet its needs in full through allocations in its forthcoming Local Plan, along with existing commitments. The parties agree that HDC will engage with CBC on this matter when the work has been finalised and its position is known. Should G&T needs be unable to be met in HDC, it may request assistance from CBC to meet unmet needs but there is currently no formal request from either authority to assist with meeting the other's GTTS needs on a cross-boundary basis.

#### **5. Employment Growth**

5.1 The joint Economic Growth Assessment confirms that the Northern West Sussex (NWS) area operates as a broad functional economic market area, with the spatial extent largely consistent with the authority boundaries of Crawley, Horsham and Mid Sussex. Each of the three local authority areas is characterised by its own set of economic strengths and challenges. In particular:

- Crawley represents the dominant commercial centre in NWS and drives demand for employment space, attracting most activity and commands highest rents.



- By comparison, Horsham tends to operate as secondary property market, but which is nevertheless accommodating new business development and continues to attract demand from a range of occupiers.
- There is some interaction and competition between different centres in the NWS area for occupiers and investment. Forthcoming developments of a strategic nature offer potential for more competition in future although they are planned for different uses.
- The stock of industrial space has been increasing across each NWS authority area in recent years. At the same time, the stock of traditional industrial jobs (typically occupying [former] B1c/B2 space) has been declining, although logistics and distribution related jobs (typically occupying B8 space) have increased in both Crawley and Horsham.
- Changes to permitted development rights have resulted in the removal of a sizeable quantum of office space from the market, whilst the stock of office jobs has increased. A key recent feature of the market is a reported mismatch between demand for high quality 'Grade A' new office space and available supply which rarely meets this specification.

5.2 Figure 4 shows the comparable needs of the two authorities as established by the EGA and the focused updates:

Figure 4: Use Class Needs for Crawley and Horsham 2019 - 2036 (EGA 2020)

	1. Baseline Job Growth	2. Past Development Rates	3. Baseline Labour Supply	4. Alternative Housing Delivery (Med)	4. Alternative Housing Delivery (High)
Crawley All B Uses (OE, Q2 2018) (January 2020)	+6,970sqm floorspace -1.1ha land	+130,900sqm floorspace +33.0ha land	(752dpa) +432,910sqm floorspace +113.0ha land		
Horsham All B Uses (January 2020)	+40,730sqm floorspace 8.3ha land	+140,590sqm floorspace 39.0ha land	(965dpa) 143,375sqm floorspace 35.3ha land	(1,200dpa) 206,840sqm floorspace 51.0ha land	(1,400dpa) 260,855sqm floorspace 64.3ha land
Crawley All B Uses Experian Q2 2018 (Focused Review September 2020)	+154,680sqm 38.7ha land	+159,290sqm 39.6ha land	As Jan 2020 EGA	(347dpa) 92,835sqm floorspace 21.7ha land	(597dpa) 243,480sqm floorspace 56.9ha land
Horsham All B Uses (Focused Review November 2020)	+13,300sqm 0ha land	+179,240sqm 45.1ha land	(920dpa) +166,990 37.5ha land	(1,200dpa) +240,910 54.0ha land	(1,400dpa) +303,820 68.1ha land
Crawley All B Uses Experian Q4 2022 (Focused Review January 2023) – covers period 2023 to 2040	+113,390sqm 26.2ha land	136,510qm 32.0ha land	As Jan 2020 EGA	(314dpa) 113,351sqm 26.1ha land	(544dpa) 299,362sqm 69.0ha land

#### Labour Supply:

5.3 The level of additional employment supply required above the Standard Methodology figure has been tested for housing growth in Horsham District of 1,200dpa; and High – 1,400dpa. These higher scenarios would include an element of Crawley's unmet housing needs (i.e. some of the Standard Method 750dpa figure for Crawley borough not able to be accommodated within the borough's

administrative boundaries). The emerging HDLP will identify a level of employment growth commensurate with the overall housing target that can be accommodated during the Plan period. It will also take account of any existing employment commitments.

- 5.4 For Crawley, assessing the full Standard Method housing delivery figure of 752dpa, as assessed at the time of the EGA, provided an unrealistic impression of the actual labour supply associated with the Local Plan, as Crawley is unable to meet its housing need in full. Therefore, for the Crawley Focused EGA Updates in 2020 and 2023, two alternative housing delivery figures were tested: the borough constrained supply led figure of 347dpa in 2020 (updated to 314dpa in 2023)); and a higher 597dpa in 2020 (updated to 544dpa in 2023) which included the potential for growth immediately adjacent to Crawley, at the West of Ifield, but within Horsham district. For both EGAs, this latter scenario was not progressed further as it was acknowledged that such an urban extension would not meet solely Crawley's housing needs and would also meet those from the adjoining district. Therefore, it is anticipated that, although some employment needs arising from an urban extension may need to be met in Crawley, remaining employment need arising from the development may be accommodated within the urban extension itself, or if necessary, elsewhere within neighbouring districts.

*Local Plan Employment Strategies:*

- 5.5 On the basis of Crawley's focused EGA update, the Crawley Borough Local Plan Review identifies a need for a minimum of 26.2 hectares new business land in the borough, based on Experian Baseline Job Growth projections. This is anticipated to be met in full within the borough, through opportunities within the existing Main Employment Areas and the allocation of a new Strategic Employment Location at Gatwick Green, to provide at least 13.73 hectares of new industrial land (principally within the B8 storage & distribution sector).
- 5.6 Horsham District Local Plan will ensure a sufficient supply and choice in employment floorspace across the District, both within the urban and rural areas. The approach outlined at the Regulation 18 consultation stage, is to seek to retain Key Employment Areas to enable the redevelopment, regeneration, intensification and smart-growth of existing sites, and allocate new sites for employment-led development. Larger site allocations are expected to provide opportunities for employment and for people to live and work locally. It is anticipated that these sources of supply will exceed the assessed level of need in the District, to allow current business premises to grow and expand, or to move into premises that meet modern business demands, and to help provide a wide choice of local jobs that help ensure that the loss of business and commuting rates outside the District are not exacerbated.
- 5.7 The parties agree that the approaches to employment growth in the respective emerging Horsham District Local Plan and Crawley Borough Local Plan Review are appropriate, and reflect the recent joint evidence base contained in the Economic Growth Assessment (EGA), the Crawley EGA focused updates September 2020 and January 2023, and the Northern West Sussex EGA Focused Update for Horsham (Nov 2020). The EGA outlines potential options for future supply of industrial land within Crawley Borough's boundary, but also notes the potential for unmet employment need to be accommodated elsewhere in the wider NWS FEMA should circumstances change.
- 5.8 The parties also agree that the approaches taken to employment growth in the respective emerging Horsham District Local Plan and Crawley Borough Local Plan will provide a complementary role in

ensuring economic growth is maximised and a variety of opportunities are provided within the NWS Functional Economic Area for existing businesses, business growth, business start-up and labour supply.

## 6. Settlement hierarchy

6.1 Both parties agree that Crawley is a higher order settlement providing significant employment opportunity and a retail centre for the sub-region, and Horsham Town is a primary economic and cultural centre serving both Horsham town and the wider District. It is also agreed that a number of smaller settlements within Horsham District play a further important role as service centres and employment hubs serving more local needs. The parties agree that Crawley, Horsham Town and the smaller settlements will continue to be promoted as complementary to one another, in respect of their employment, retail and services functions.

## 7. Homes England's Proposals for Strategic growth West of Crawley

7.1 A strategic growth area to the immediate West of Crawley (WoC) is being promoted by Homes England through the Horsham District Local Plan review process. The site is near-contiguous with the administrative and urban boundaries of Crawley. The proposals for this site are made by Homes England (HoE), who own a significant area of land to the west of Ifield. They indicate that this land could deliver an initial "West of Ifield" neighbourhood development of around 3,000 homes. These proposals also include provision of employment, retail, open space for informal public use and formal recreation, schools, and other complementary uses. Homes England have stated their belief that in the longer term there may be potential for this development to form the first phase of a wider expansion of Crawley, which would comprise around 10,000 homes in total (West of Crawley).

7.2 The parties recognise that CBC submitted an in-principle objection to the WoC proposal as part of HDC's Regulation 18 consultation and that CBC's current formal position is that it strongly opposes Homes England's proposals. The parties agree, without prejudice to HDC's decision whether or not to allocate land in the Horsham District Local Plan, that should any future proposal come forward then the Councils would work together to seek to meet needs arising from Crawley Borough as part of any development in this location. This would include consideration of affordable housing requirements and education needs.

7.3 Given potential cross-boundary impacts, the parties agree that the following key objectives would be pursued in any policy formulation should HDC decide to allocate the site, and in any discussions with the site promoter:

- a) Any future development shall be Local Plan-led to comply with all the applicable policies set out in the Horsham District Local Plan and also for compliance with the Crawley Borough Local Plan to be an important and significant material consideration.
- b) Any development must be landscape/townscape-led, in particular ensuring the settlement gap between development 'at Crawley' and Horsham Town is maintained and enhanced by securing defensible boundaries, ensuring any negative impacts on the setting of Crawley are mitigated through thoughtful and careful layout and design of the scheme, and visual, physical and sustainable connectivity is maintained and enhanced, whilst upholding the "net zero" aspirations

of both authorities through the development from Crawley's neighbourhoods to the countryside beyond.

- c) Development must be a comprehensive design and strategically planned to ensure all the infrastructure needs for the whole proposed development "West of Crawley" are met and either delivered from its commencement or with delivery targets set out in a legal agreement. This will include the submission of comprehensive masterplans ahead of submission of Horsham District Local Plan, to the satisfaction of both authorities.
- d) Development as a whole, and all phases within it, should demonstrate excellence with respect to maximum energy efficiency, decarbonisation and sustainability, water use efficiency, active and sustainable transport, high quality urban design and effective use of land, green infrastructure connectivity and biodiversity net gain. The development proposals should clearly evidence a high priority commitment to achieving net zero carbon emissions.
- e) The housing mix in terms of dwelling type, size and tenure must meet the agreed need of the local communities, based on the joint Strategic Housing Market Assessment, appropriate for an "At Crawley" location. In particular, the Affordable Housing provision must meet those needs considered to be most acute and appropriate for a strategic development in this location, taking account of needs identified by CBC. The councils will seek to reach formal agreement in relation to shared nomination rights for the affordable housing provision.
- f) The parties will work together, with the Highways authority to ensure that any masterplan prepared by the site promoter secures an effective transport strategy to serve the development. This will deliver a multi-modal sustainable transport route that delivers active travel options and mitigates adverse impacts of traffic flow into Crawley. The new route must not be an obstacle to the delivery of a comprehensive new corridor link to the west of Crawley, that would connect the A264 near to Faygate to the A23 north of County Oak.

Both HDC and CBC will continue to work jointly to seek a clear commitment from Homes England or other appropriate government bodies to the full delivery of the sustainable transport corridor link to support the scale of development proposed in any allocation. To support such a commitment this will include any necessary safeguarding of land within respective Local Plans, and consideration of funding models including developer contributions. The parties are engaging with WSCC and Gatwick Airport regarding the boundaries of safeguarding, especially in the vicinity of the multi-modal sustainable transport corridor link along the southern boundary of the airport.

- g) Provide for educational needs arising within the development, and additionally make suitable provision or allowance for meeting educational needs in the wider area, in particular Crawley's secondary education needs insofar as they cannot be met within the constrained borough of Crawley. Education provision meeting Crawley's needs would be subject to delivery by the Department for Education, securing sufficient alternative funding, and/or appropriate developer contributions or sufficient volumes of CIL being available from growth within Crawley Borough.
- h) Provide appropriate and sufficient access to healthcare provision, ideally on-site, to address all healthcare needs arising from new development in order to ensure no additional pressure on existing provision in both Horsham District and Crawley Borough. Any scheme should be

designed to maximise healthy lifestyles and meet agreed levels of open space and sports facilities; located, designed and laid out appropriately for strategic neighbourhood scale developments and reflecting the 'at Crawley' blended needs.

- i) Open space, sports and recreation facilities to be provided in accordance with an agreed approach to standards, taking into account the existing socio-economic demographic information for Horsham and Crawley, along with quantity, quality and accessibility of existing provision.

#### Outstanding Matters for Further Investigation and Discussion

7.4 It is acknowledged that this is a significant proposal. Should the "West of Ifield" site be allocated, there are many matters yet to be finalised and supported by evidence. In view of the cross-boundary nature of this proposal, it is important that any development scheme satisfies both authorities, with a requirement to as far as possible secure agreement from both ahead of any future planning application. The councils agree to continue to work together and maintain the transparent and cooperative approach taken to date in order to resolve these issues. In particular this relates to housing needs, the delivery upfront of all the required infrastructure, including the multi-modal sustainable transport corridor link and mitigating the environmental impacts. .

### **8. Gatwick Airport**

8.1 HDC and CBC work closely with each other, Gatwick Airport Ltd (GAL) and other local authorities through a number of working groups focusing on airport-related matters which are structured at various levels, focused around the following groups. These groups meet on a regular basis to discuss and reach consensus on airport-related matters, co-operate in monitoring and assessment tasks, and lobby for change as a combined group with greater weight than as individual authorities:

- Gatwick Airport Consultative Committee (GATCOM) - Statutory consultative body for Gatwick Airport
- Gatwick Joint Local Authorities Group (GJLA) - Group of all local authorities neighbouring the airport
- Gatwick Officers Group (GOG) - Officer group supporting GJLA and GATCOM
- Noise and Track Monitoring Advisory Group (NATMAG) - Group monitoring airport-related noise and flight path tracking

8.2 Both parties agree that they will maintain engagement with these groups thereby achieving effective joint working. The parties also agree that, in light of the draft Aviation Strategy, "Aviation 2050; The Future of UK Aviation", the safeguarding of land for a potential new southern runway at Gatwick will continue to be upheld in their respective emerging Local Plans, with the Crawley Local Plan amending its boundary to exclude land allocated for the strategic employment site. This will be reviewed if required should there be renewed certainty in national policy regarding the requirement to safeguard land at Gatwick.

8.3 The appropriate noise contours for decision-making are the Gatwick Master Plan 2019 Additional Runway Summer Day 2040 contours (Plan 31) until such time as these are superseded by subsequent noise contours that are published by Gatwick Airport and approved by the CAA.

- 8.4 Both parties agree that it is appropriate for both local plans to include policies that seek to prevent the provision of additional or replacement airport-related parking outside of the Airport Boundary.
- 8.5 Both parties agree to continue to work collaboratively with the other Gatwick Authorities with regard to the Gatwick Airport's Northern Runway Development Consent Order proposals and to co-operate in preparing responses to those proposals overseen by a Gatwick Steering Group of senior officers.

## 9. Education provision

- 9.1 Subject to the requirements of WSCC and the Department for Education, it is agreed by the parties that Crawley Borough has an unmet need for secondary school places of 4 – 6 forms of entry which, due to a lack of suitable sites, cannot be met within the Borough boundaries. As such, it is agreed that in the event of land being allocated for development to the West of Crawley, appropriate provision must be made to meet this need (see Section 7 above). This would need to include sufficient new secondary school provision to meet the needs of the new development as well as any existing unmet needs arising from Crawley and potential future needs in the area.

## 10. Water Neutrality

- 10.1 Horsham District falls entirely within the Sussex North Water Supply Zone (SNWSZ), and the majority of Crawley Borough also falls within this zone. In September 2021, Natural England (NE) issued a Position Statement. This explains that it cannot be concluded that the existing water abstraction, at Pulborough, within the SNWSZ is not having an impact on the Arun Valley Special Area of Conservation (SAC) and Ramsar site. It advises that development within this zone must not add to this impact. This prevented local plans from progressing to later formal stages until such a time when a Water Neutrality Strategy could be agreed. The Strategy must ensure no further increase in water abstraction at Pulborough as a result of further development.
- 10.2 A Water Neutrality Study was undertaken by consultants commissioned on behalf of the parties, together with the other affected local authority (Chichester District Council), supported by key partner agencies (including Natural England, Environment Agency, Southern Water) and authorities (West Sussex County Council, South Downs National Park and Mid Sussex District Council). Part C: the Water Neutrality Strategy, agreed by the Chief Executives of the Local Planning Authorities and endorsed by Natural England, was published in November 2022.
- 10.3 The parties have prepared a joint Local Plan water neutrality policy setting out significantly tighter water efficiency measures for new development and requiring offsetting of any remaining projected net increases in water use. The parties agree that, together with the other affected local authority (Chichester District Council), and key partner agencies, they will produce a Sussex North Offsetting Water Scheme (SNOWS) which meets legal and soundness tests. They further agree to work together to implement actions required by the Strategy, which may include cross-boundary off-setting measures including retrofitting of existing buildings, aiming to achieve water neutrality across the SNWSZ. The parties are part of a working group, supported by a dedicated full-time Water Neutrality Officer, which is working hard to achieve this.

10.4 Both authorities are parties to an agreed separate Statement of Common Ground on Water Neutrality which sets out further details regarding the cooperation and joint work to resolve this strategic issue.

## 11. Closing matters and further work

11.1 The parties to this statement have demonstrated that they have worked jointly and constructively on 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.

11.2 In summary, specific joint work includes:

- Regular joint review of housing delivery to identify early any supply related cross-boundary issues (**outcomes:** joint SHMA; updates to SoCG; agreement on approach to meeting unmet housing needs);
- Proactive participation in the West Sussex and Greater Brighton partnerships and Gatwick Diamond Local Authorities (**outcome:** wider sub-regional coordinated strategy to meeting development needs);
- Proactive and frequent co-operation and co-ordination within the Northern West Sussex group of authorities (Crawley, Horsham, Mid Sussex and West Sussex County Council) (**outcomes:** signed and continually updated NW Sussex SoCG, joint evidence base updates following on from published joint studies);
- Co-ordination of educational provision to be addressed on a cross-boundary basis and as part of any future West of Crawley strategic development in Horsham district (**outcome:** potential delivery of a new secondary school to help meet existing unmet needs, in particular from Crawley, and development needs in any West of Crawley strategic development);
- A joint approach to considering any future allocation of the West of Crawley strategic site and any subsequent planning applications, which if allocated would include:
  - promoting and seeking to agree a landscape/townscape-led masterplan, working with Homes England to ensure appropriate provision and upfront phasing of all infrastructure to ensure its delivery in advance of occupancy, an appropriate housing mix including an agreed joint strategy for affordable housing, delivery of genuine and demonstrable biodiversity net gain and a sustainable transport strategy and delivery plan.
  - Working together to ensure that any new development does not become an obstacle to the future provision of a possible new western link road, that would provide a multi-modal transport corridor link equipped with sustainable transport infrastructure for a zero net carbon future.
  - **outcome:** that the site promoter brings forward an effective transport strategy for approval by both authorities to serve any new development together with potential delivery of a full multi-modal transport link that serves current and any strategic scale allocation in the Horsham District Local Plan and secures appropriate developer contributions (commensurate to the scale of the development) to contribute to its

provision, alongside delivery of any strategic development to the west of Crawley; a successful outline planning application that is supported by both parties;

- Continued close cooperation on ongoing strategic cross-boundary issues and supporting technical work including transport & highways, economic growth, employment land, water management and infrastructure, biodiversity net gain, net zero, landscape and green/blue infrastructure (**outcomes:** complementary transport studies and updates; presumption for joint studies on cross-boundary matters).



**Appendix A: Joint Documents**

<b>Document</b>	<b>Joint Authorities</b>	<b>Study Scope</b>
West of Bewbush Joint Area Action Plan (July 2009) Crawley Borough Council and Horsham District Council	Crawley and Horsham	Adopted Area Action Plan Development Plan Document for strategic neighbourhood development adjacent to Crawley within Horsham District.
Northern West Sussex Strategic Housing Market Area (November 2019) Icenl	Crawley and Horsham	Housing Market & Housing Needs
Economic Growth Assessment (January 2020) Lichfields	Crawley, Mid Sussex and Horsham	Employment Land requirement
Eco-Serv GIS Report (2019)	Crawley and Horsham	Green Infrastructure Ecological Services
Gatwick Water Cycle Study (2020)	Crawley, Mid Sussex, Horsham, Reigate and Banstead	Water resources
Strategic Flood Risk Assessment (2020)	Crawley and Horsham	Flooding
Water Neutrality Study Part B: In Combination Assessment	Chichester, Crawley and Horsham	Water resources
Water Neutrality Study Part C: Water Neutrality Strategy	Chichester, Crawley and Horsham	Water resources
Water Neutrality Topic Paper	Chichester, Crawley and Horsham	Water resources

**Appendix B: HDC/CBC Strategic Planning Meetings Jan 2016 – May 2023**

Strategic Groups (HDC/CBC)	2016	2017	2018	2019	2020	2021	2022	2023
<p>NWS Planning Policy Officers</p> <p>Key Outputs:</p> <ul style="list-style-type: none"> <li>• Shared understanding of cross boundary issues</li> <li>• SoCG signed (2016)</li> <li>• SoCG signed (2020)</li> </ul>	<ul style="list-style-type: none"> <li>• March 2016 (Signed and Published Updated NWS Position Statement)</li> <li>• 25 August (Wastewater Infrastructure: NWS Authorities/ Thames Water)</li> </ul>	<ul style="list-style-type: none"> <li>• 5 July</li> <li>• 25 July</li> <li>• 26 July</li> <li>• 22 August</li> <li>• 13 Dec</li> </ul>	<ul style="list-style-type: none"> <li>• 12 July</li> <li>• 6 Nov (Wastewater Infrastructure: NWS Authorities/ Thames Water)</li> <li>• 6 Nov (Economic and Housing Evidence)</li> <li>• 14 Nov</li> </ul>	<ul style="list-style-type: none"> <li>• 21 Oct</li> <li>• 19 Dec</li> </ul>	<ul style="list-style-type: none"> <li>• 2 June (Signed and Published NWS SoCG)</li> </ul>	<ul style="list-style-type: none"> <li>• 26 Jan</li> <li>• 17 May</li> <li>• 12 July</li> </ul>	<ul style="list-style-type: none"> <li>• 17 Feb</li> <li>• 31 March</li> <li>• 16 May</li> <li>• 26 May</li> <li>• 7 July</li> <li>• 21 July</li> <li>• 15 Sept</li> <li>• 10 Nov</li> </ul>	<ul style="list-style-type: none"> <li>• 5 Jan</li> <li>• 13 Feb</li> <li>• 9 March</li> <li>• 27 April</li> </ul>
<p>Crawley/ Horsham Policy Meeting</p> <p>Key Output:</p> <ul style="list-style-type: none"> <li>• Statement of Common Ground (June 2023)</li> </ul>				<ul style="list-style-type: none"> <li>• 20 March</li> <li>• 27 Sept (DtC &amp; NWS)</li> </ul>	<ul style="list-style-type: none"> <li>• 5 May</li> <li>• 20 May</li> <li>• 28 May</li> <li>• 2 Sept</li> <li>• 24 Sept</li> <li>• 15 Oct</li> <li>• 12 Nov</li> <li>• 26 Nov</li> <li>• 1 Dec</li> <li>• 17 Dec</li> </ul>	<ul style="list-style-type: none"> <li>• 7 Jan</li> <li>• 25 Jan</li> <li>• 28 Jan</li> <li>• 18 Feb</li> <li>• 18 March</li> <li>• 8 April</li> <li>• 12 April</li> <li>• 22 April</li> <li>• 13 May</li> <li>• 20 May</li> <li>• 3 June</li> <li>• 5 August</li> <li>• 26 August</li> <li>• 16 Sept</li> </ul>	<ul style="list-style-type: none"> <li>• 13 Jan</li> <li>• 10 Feb</li> <li>• 31 March</li> <li>• 28 April</li> <li>• 18 May</li> <li>• 7 July</li> <li>• 1 Sept</li> <li>• 29 Sept</li> <li>• 20 Oct</li> <li>• 14 Nov</li> </ul>	<ul style="list-style-type: none"> <li>• 2 Feb</li> <li>• 16 March</li> <li>• 6 April</li> <li>• 27 April</li> <li>• 18 May</li> <li>• 5 June</li> <li>• 8 June</li> </ul>

Strategic Groups (HDC/CBC)	2016	2017	2018	2019	2020	2021	2022	2023
						<ul style="list-style-type: none"> <li>• 7 Oct</li> <li>• 4 Nov</li> <li>• 2 Dec</li> </ul>		
Potential New Railway Stations between Crawley and Horsham (Arun Valley Line) Key Output: <ul style="list-style-type: none"> <li>• Draft Network Rail Timetable Study</li> <li>• Draft WSP Timetable Study</li> </ul>			<ul style="list-style-type: none"> <li>• 23 April</li> <li>• 25 May</li> <li>• 5 June</li> <li>• 19 June</li> <li>• 16 July</li> <li>• 31 July</li> <li>• 9 August</li> </ul>	<ul style="list-style-type: none"> <li>• 10 May</li> <li>• 14 Oct</li> </ul>	<ul style="list-style-type: none"> <li>• 4 Feb</li> <li>• 7 Sept</li> <li>• 14 Oct</li> </ul>			
Economic Growth Assessment Key Output: <ul style="list-style-type: none"> <li>• Published Joint Economic Growth Assessment for Crawley, Horsham and Mid Sussex</li> <li>• Local Plan policies</li> </ul>			<ul style="list-style-type: none"> <li>• 26 Feb (Strategic Employment Reigate and Banstead Borough; Horsham District; Mid Sussex District; West Sussex County; and Crawley</li> </ul>	<ul style="list-style-type: none"> <li>• 24 Jan</li> <li>• Feb (commissioned study)</li> <li>• 7 March (Inception Meeting)</li> <li>• 9 May</li> <li>• 22 May</li> <li>• 24 Sept</li> </ul>	<ul style="list-style-type: none"> <li>• 27 Jan (completed and Published document)</li> </ul>			

Strategic Groups (HDC/CBC)	2016	2017	2018	2019	2020	2021	2022	2023
			Borough Councils)					
<p>Strategic Housing Market Assessment</p> <p>Key Output:</p> <ul style="list-style-type: none"> <li>Published joint Strategic Housing Market Assessment for the Northern West Sussex Housing Market Area and updating data for Crawley and Horsham</li> <li>Local Plan policies</li> </ul>	<ul style="list-style-type: none"> <li>30 August (Starter Homes and Market Housing Inception Meeting)</li> <li>14 Oct (Interim Meeting)</li> <li>7 Dec (Published Evidence Documents)</li> </ul>			<ul style="list-style-type: none"> <li>5 Feb (commissioned study)</li> <li>1 March (Inception Meeting)</li> <li>25 July</li> <li>29 Nov (completed and published document)</li> </ul>				
<p>Water Neutrality Study Key Output:</p> <ul style="list-style-type: none"> <li>Published joint Part B: In Combination Assessment</li> <li>Published joint Part C: Water</li> </ul>					<ul style="list-style-type: none"> <li>21 Dec (commissioned Water Neutrality Study)</li> </ul>	<ul style="list-style-type: none"> <li>July (Water Neutrality Study Part A (Crawley and Chichester) and Water Neutrality Technical Note (Horsham))</li> </ul>	<ul style="list-style-type: none"> <li>5 April (agreed Governance Structure and Terms of Reference)</li> <li>April (published Part B)</li> </ul>	<ul style="list-style-type: none"> <li>Jan (Joint Water Neutrality Project Manager employed)</li> <li>14 March (officer attendance at</li> </ul>

Strategic Groups (HDC/CBC)	2016	2017	2018	2019	2020	2021	2022	2023
Neutrality Strategy • Local Plan joint Policy Appointment of Joint Water Neutrality Project Manager post						documents published)	• 6 Nov (Joint PINs Advisory Meeting held) • 27 Oct (Part C agreed by LPA Chief Execs) • 24 Nov (Part C endorsed by Natural England) • Dec (published Part C)	HoL Built Environment Committee)

The full details of the governance structure and meetings involved in resolving the water supply issues can be provided on request/are set out in the SoCG/Joint Topic Paper/CBC's DTC Statement.

Other meetings attended by both HDC and CBC include:

- Homes England Strategic Site Planning Performance Agreement joint discussions (Homes England, HDC, WSCC, CBC)
- Gatwick Diamond Local Authorities Member Meetings
- Gatwick Diamond Local Authorities Planning Officer Group
- West Sussex and Greater Brighton Strategic Board (Members)
- West Sussex and Greater Brighton Planning Officer Group
- West Sussex Planning Policy Officer Group



- Gatwick Joint Local Authorities (Members)
- Gatwick Airport: Gatwick Officers Group
- Gatwick Airport: GATCOM (Members)
- Gatwick Airport Transport Forum Steering Group
- Gatwick Parking Survey Officers Meeting

## 1. List of Parties involved

- Crawley Borough Council (CBC)
- Mid Sussex District Council (MSDC)

## 2. Signatories



**Date 11/07/23**  
**Crawley Borough Council**  
**Clem Smith, Head of Economy and Planning**



**Date 27/07/23**  
**Mid Sussex District Council**  
**Head of Service**

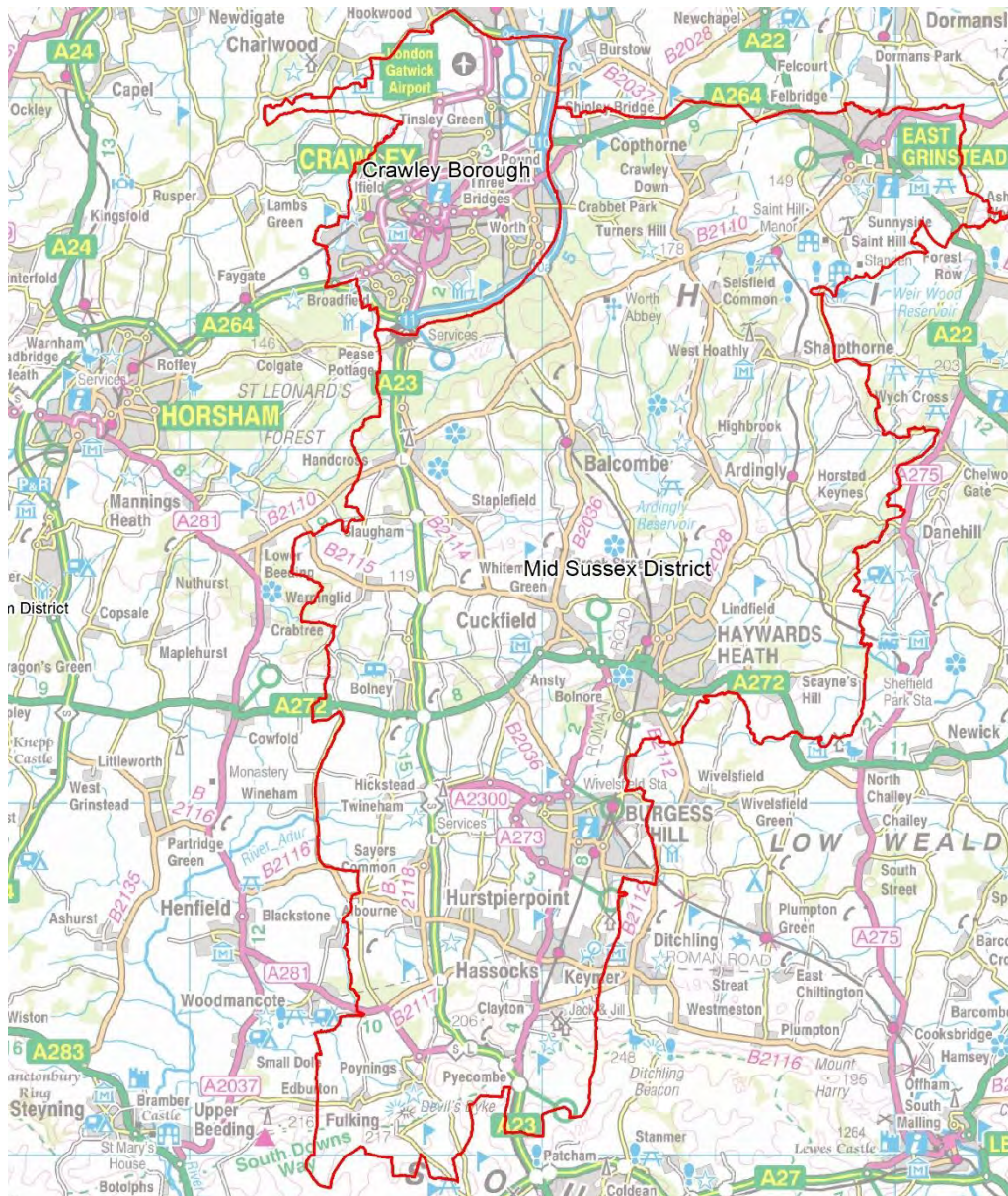
## 3. Strategic Geography

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

Crawley and Mid Sussex are located within the county of West Sussex and share a common boundary. The authorities are separated to the east/south east of Crawley by the A23/M23 strategic highway.

Both authorities are located within the Gatwick Diamond sub-region and within the Coast to Capital Local Enterprise Partnership (LEP) Area and work cooperatively across the West Sussex and Greater Brighton strategic planning area. The two authorities have a long history of positive and active engagement on cross-boundary matters, including through Statements of Common Ground agreed as part of the Northern West Sussex Authorities, along with Horsham District Council (initially agreed in September 2013 and revised in July 2014, February and March 2015, March 2016 and May 2020, which included West Sussex County Council) as well as a bilateral SoCG between the two authorities reached through the Mid Sussex Site Allocations Development Plan Document, agreed in May 2020 (adopted 2022). The Northern West Sussex Statement of Common Ground is being updated and a separate Housing-specific Statement of Common Ground is being prepared and agreed between the three Northern West Sussex district/borough authorities.

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



A scale map of the Gatwick Diamond 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 affordable housing, self- and custom-build and Gypsy, Traveller and Travelling Showpeople needs, across the Northern West Sussex Housing Market Area;
- Economic Growth;
- to continue and develop the existing shared approach to Gatwick Airport, having regard to its economic and social benefits, and also its environmental impacts including those relating to air quality, noise pollution, and surface access;



- to develop an agreed position on the transport impacts of Local Plan proposals, in particular from strategic allocation sites close to authority boundaries;
- to establish a common and agreed position on secondary education need and provision arising between the two authorities;
- to identify and develop opportunities for health provision if required through evidence;
- to develop an agreed position on cross boundary flooding impacts;
- to develop an agreed position in relation to water supply and waste water treatment impacts of strategic allocation sites.

Strategic matters agreed between the two authorities are set out in:

- Northern West Sussex Statement of Common Ground (June/July 2023)
- Northern West Sussex Statement of Common Ground Housing Extract (June/July 2023)
- Water Neutrality Statement of Common Ground (June/July 2023)
- Gatwick Diamond Local Strategic Statement (2016)

This Statement of Common Ground is focused on the cross-boundary matters specifically affecting the two authorities.

**Agreements** reached for each of the matters are set out below:

#### Housing Need

The parties agree:

1. Both authorities are primarily located in the Northern West Sussex (NWS) Housing Market Area.
2. A robust and appropriate Strategic Housing Market Assessment has been completed for each local authority.
3. 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. MSDC has shared and invited comments from CBC on the methodology and conclusions of its Site Selection Process for its Regulation 18 draft and CBC.
4. CBC and MSDC will engage through the Northern West Sussex Authorities, the Gatwick Diamond Authorities and the West Sussex and Greater Brighton Authorities, as a wider Duty to Cooperate forums, with other neighbouring authorities in relation to housing related matters, including affordability, large scale developments and opportunities for meeting unmet need.
5. The Northern West Sussex authorities agree that, subject to meeting individual housing needs and establishing that there is potential to assist other authorities with unmet needs, assistance will be prioritised as follows:
  - Priority 1: Northern West Sussex HMA
  - Priority 2: Coastal West Sussex HMA
  - Priority 3: Other adjacent and nearby HMAs where it is justified by each individual authority.
6. The draft Crawley Local Plan identifies that Crawley's land supply allows for 42% of its overall housing needs to be met on sites within the borough's administrative boundaries: a minimum totalling 5,030 dwellings over the Plan period (2024 – 2040). 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. In light of this unmet need, Crawley Borough

Council wrote to MSDC in January 2020 and in April 2023 to request whether Mid Sussex District Council is able to assist in contributing to these unmet needs.

7. The draft Mid Sussex District Plan (Regulation 18) was published in November 2022. The draft Mid Sussex District Plan covers the plan period 2021 – 2039 and will supersede the current adopted District Plan (2014-2031) upon adoption. It is based on a housing requirement of 1,119 dwellings per annum (20,142 for the full plan period) set by the Standard Methodology. Once accounting for existing commitments and completions, the draft Plan identifies a residual housing need of 8,169 dwellings. The draft Plan allocates three Sustainable Communities (mixed-use sites with over 1,000 dwellings and supporting infrastructure such as retail, community uses, education and open space), 21 housing sites and a windfall allowance – in total 8,471 dwellings. The draft Plan therefore aims to meet Mid Sussex housing need with an over-supply of 302 dwellings.
8. Crawley has an affordable housing need of 739 dwellings per year. The amount of affordable housing being met within the borough, through the Local Plan, is anticipated to equal 108dpa (15% of the overall need). The parties agree to consider opportunities to address affordable housing needs and appropriate housing mix as evidenced through the CBC SHMA and any subsequent updates, subject to viability, particularly, but not restricted to, where development may take place adjacent to Crawley. In such circumstances, the councils will seek to reach formal agreement in relation to shared nomination rights for the affordable housing provision.
9. Mid Sussex has an affordable housing need of 470 dwellings per annum (rented) and 455 dwellings per annum (other AHO products), indicating a pressing need for affordable housing in the district which forms the starting point for setting policy which will need to be weighed against the amount of housing that can be viably provided.
10. Due to Crawley’s predominantly urban nature, with a high proportion of higher density residential schemes proposed, and the limited area of land outside the existing Built-Up Area Boundary, with the exception of the land affected by aircraft noise constraints, there are limited opportunities for self-build to take place within the borough’s administrative boundaries. The current number of individuals and groups on the council’s Self- and Custom-Build Register is 90; of which 73 are Part 1 entries (i.e. those which satisfy local eligibility criteria) and a further 17 are Part 2 entries. The parties acknowledge that those with a desire to self-build in the area will be able to register with the relevant authority subject to local eligibility criteria. The parties therefore agree that the outcomes of emerging policies will be monitored and policies reviewed in future if appropriate.
11. Both authorities will each seek to meet their own need for additional Traveller provision.

#### Employment, Economic Development and Retail

The parties agree:

12. CBC and MSDC are located within the Northern West Sussex Functional Economic Market Area.
13. An Economic Growth Assessment (2020) has been undertaken, and subsequently updated (September 2020 and January 2023) which identifies a total employment land requirement for Crawley of 26.2ha new business land, resulting in an outstanding requirement for a minimum of 13.73ha new B8 storage and distribution land.
14. 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. This is considered to complement the offer of Burgess Hill Science and Technology Park, allocated

in the adopted Mid Sussex Site Allocations Development Plan Document (2022) which will not be providing B8 storage & distribution floorspace.

15. The “Town Centre First” approach for each authority is appropriate and neither are proposing strategic scale retail development.

#### Gatwick Airport

The parties agree:

16. Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.
17. As part of the submission Local Plan, CBC propose to allocate 13.73ha of land east of Balcombe Road, and south of the M23 Spur, referred to as Gatwick Green, for a strategic employment site. This site is identified by the Gatwick Airport Masterplan (2019) for safeguarding as to be utilised for a large area of surface car parking. CBC does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of their borough, and is of the view that the airport could accommodate parking more efficiently through decked parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport’s surface access obligations stated in the S106 legal agreement. Therefore, the CBC submission Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur.
18. Airport related parking should be located on-airport as the most sustainable location and should be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.
19. The appropriate noise contours for decision-making are the Gatwick Master Plan 2019 Additional Runway Summer Day 2040 contours (Plan 31) until such time as these are superseded by subsequent noise contours that are published by Gatwick Airport and approved by the CAA.
20. Each authority will work collaboratively with Gatwick Airport, the other Gatwick local authorities and the LEP to understand the implications of the proposed Northern Runway Nationally Significant Infrastructure Project (NSIP) on the environment, community and economy, and to respond to the Development Consent Order (DCO) application.
21. They will work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal Agreement, to share expertise on airport related matters including noise, air quality and parking.

#### Education

The parties agree:

22. Planning for education in Crawley borough will require discussions between the authority areas (CBC and MSDC), involving West Sussex County Council and the Department for Education.

#### Health

The parties agree:

23. Planning for health provision, particularly in relation to strategic sites adjacent to Crawley, will require discussions across the two authority areas (MSDC and CBC), involving NHS.

## Flooding

The parties agree:

24. Cross boundary flooding matters will be worked on at a strategic mitigation level, alongside the County Lead Local Flood Authority (West Sussex).

## Strategic Sites

The parties agree:

25. Development of Strategic Sites adjacent to the administrative boundary between the two authorities will be Local Plan-led to comply with the policies set out in the Mid Sussex District Local Plan and for the Crawley Borough Local Plan to also be a material consideration.
26. Where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together, along with the two county councils (Surrey and West Sussex) and Highways England, to establish a joint planning policy position to support positive and sustainable development management and maximise infrastructure and sustainability benefits. Robust transport modelling will be used to ensure that growth will not result in severe transport impacts upon the road networks in CBC and MSDC. They will continue to discuss any impacts on the strategic and local road network and will jointly explore opportunities for transport improvements, including public transport, through discussions with West Sussex County Councils. Appropriate higher densities and access to neighbourhood facilities should be explored between the parties and the site promoter to maximise active travel and public transport usage.
27. To work together to seek opportunities to ensure housing mix in terms of dwelling type, size and tenure meets the agreed need of the local communities, based on the Strategic Housing Market Assessments for both authorities, appropriate for an "At Crawley" location. Such opportunities to reflect local housing mix will be explored further as any allocation on/adjacent to the authority border proceeds through the Local Plan process. In particular, the Affordable Housing provision must explore opportunities to meet needs considered to be most acute and appropriate for a strategic development in this location. The councils will seek to reach formal agreement in relation to shared nomination rights for the affordable housing provision.
28. They will continue to work together to consider any impacts on other infrastructure, such as health, education, water supply and waste water.

## 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.

This Statement of Common Ground is signed at Head of Service level 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:

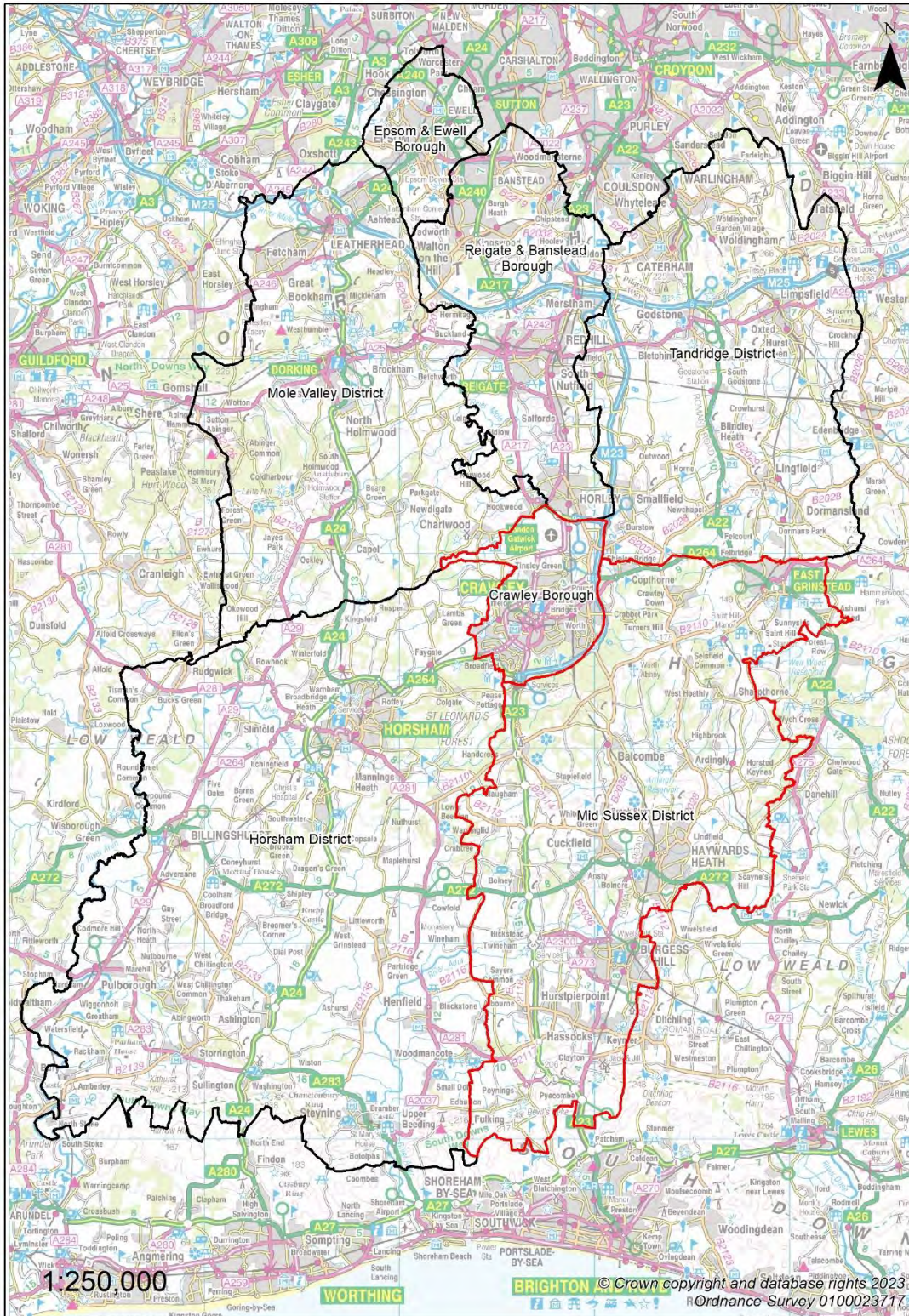
29. that they have engaged on an ongoing basis throughout preparation of the Local Plan Reviews and on this basis that the Duty-to-Cooperate has been met;

30. to continue to work with the other Northern West Sussex authorities on housing, employment, Gatwick Airport and other strategic issues affecting the Northern West Sussex Housing and Economic Market Area as a whole;
31. to work collaboratively on plan preparation and evidence, whilst acknowledging each other's timetables and timescales.
32. to respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities;
33. to meet at member and officer level to review the situation and respond to new issues and changing circumstances; and
34. to 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
<b>Crawley Local Plan</b>	Dec 2015	2019 - 2024	July 2019	Jan 2020/Jan 2021/May 2023	July 2023
<b>Mid Sussex District Plan</b>	March 2018	2022 - 2024	Nov 2022	Autumn 2023	Winter 2023

# APPENDIX A - GATWICK DIAMOND AUTHORITIES



## APPENDIX B: BACKGROUND SUPPORTING CONTEXT

### Housing Need:

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	<p>Working collaboratively on Housing Need including affordable housing across the Northern West Sussex Housing Market Area as far as is relevant.</p>
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Strategic Housing Market Assessment (2019)</li> <li>• Crawley Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (draft 2023 Review)</li> <li>• Mid Sussex Council Gypsy and Traveller Accommodation Assessment (2022)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley and Mid Sussex lie within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham District.</li> <li>• Crawley can meet 41% of its overall housing need and 15% of its affordable housing need.</li> <li>• 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. A review is currently underway to confirm this remains the position.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• The two authorities continue to work jointly to discuss and seek to resolve meeting housing needs, as well as part of Northern West Sussex authorities, Gatwick Diamond authorities and West Sussex Greater Brighton authorities.</li> <li>• The Gatwick Diamond authorities (which include Crawley, Mid Sussex, Horsham, Tandridge, Reigate &amp; Banstead and Mole Valley) agree to seek to meet their own need for additional Traveller provision.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• As each of the housing supply or updated housing market evidence is completed, the findings will be shared with between the councils.</li> </ul>

#### Employment and economic development:

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	To establish a common understanding of the employment Land requirement.
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Economic Growth Assessment (January 2020)</li> <li>• Mid Sussex Economic Growth Assessment Update (September 2022)</li> <li>• Crawley Focused EGA Update (September 2020)</li> <li>• Crawley Focused EGA Update (January 2023)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• The NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA).</li> <li>• Influential economic linkages also exist with Coastal West Sussex, Reigate and Banstead (Horley) and East Sussex.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• The CBC submission Local Plan seeks to meet the most recently identified office and industrial (storage and distribution) needs in its borough.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• The authorities will continue to work together with the other Northern West Sussex, Gatwick Diamond and West Sussex and Greater Brighton authorities on housing, employment and other strategic issues affecting the wider sub-region.</li> </ul>

#### Gatwick Airport:

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	To develop a shared approach to Gatwick Airport including the impact of air quality and noise pollution.
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Annual Airport Parking Surveys</li> <li>• Gatwick Airport Masterplan 2019</li> <li>• Gatwick Airport, WSCC, CBC Section 106 Legal Agreement 2018</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Gatwick Airport influences the environment, economy and community in the area.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.</li> <li>• Airport related parking should be located on-airport as the most sustainable location, and should be justified by a demonstrable need in the context of proposals for</li> </ul>



	achieving a sustainable approach to surface transport access to the airport.
<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>The authorities will continue to work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal Agreement, to share expertise on airport related matters including noise, air quality and parking.</li> </ul>

Education:

<ul style="list-style-type: none"> <li>Key objective</li> </ul>	To establish a common and agreed position of Secondary Education.
<ul style="list-style-type: none"> <li>Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>Crawley draft Infrastructure Plan (2023)</li> <li>Mid Sussex Infrastructure Delivery Plan (2022)</li> </ul>
<ul style="list-style-type: none"> <li>Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>CBC has needs for secondary education provision within the vicinity over their Local Plan period.</li> </ul>
<ul style="list-style-type: none"> <li>Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>CBC and MSDC agree that planning for secondary education will require discussions involving West Sussex County Council.</li> </ul>
<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>Discussions to be arranged across the authority areas (CBC, MSDC), involving West Sussex County Councils.</li> </ul>

Health:

<ul style="list-style-type: none"> <li>Key objective</li> </ul>	To identify and develop opportunities for Health provision if required through evidence.
<ul style="list-style-type: none"> <li>Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>Crawley draft Infrastructure Plan (2023)</li> <li>Mid Sussex Infrastructure Delivery Plan (2022)</li> </ul>
<ul style="list-style-type: none"> <li>Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
<ul style="list-style-type: none"> <li>Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>CBC and MSDC agree that planning for health provision will require discussions across the two authority areas, involving NHS.</li> </ul>

<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>Discussions to be arranged across the two authority areas (CBC, MSDC), involving NHS.</li> </ul>
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#### Transport Infrastructure:

<ul style="list-style-type: none"> <li>Key objective</li> </ul>	To develop an agreed position on the transport impacts of strategic allocated sites.
<ul style="list-style-type: none"> <li>Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>Crawley Local Plan Transport Modelling (June 2022)</li> <li>Crawley Infrastructure Plan (2023)</li> <li>Crawley New Directions Transport Strategy 2020</li> <li>Mid Sussex Transport Study (2022)</li> <li>Mid Sussex Infrastructure Delivery Plan (2022)</li> </ul>
<ul style="list-style-type: none"> <li>Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
<ul style="list-style-type: none"> <li>Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>CBC and MSDC agree that where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive development management and maximise infrastructure benefits.</li> </ul>
<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>Where strategic development is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint Planning Policy position to support positive Development Management and maximise infrastructure benefits.</li> <li>The authorities agree to jointly explore opportunities through discussions with West Sussex County Council.</li> </ul>

#### Water Supply and Waste Water Infrastructure:

<ul style="list-style-type: none"> <li>Key objective</li> </ul>	To develop an agreed position on the water supply and waste water impacts of strategic allocated sites.
<ul style="list-style-type: none"> <li>Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>Gatwick Water Cycle Study (2020)</li> <li>Crawley draft Infrastructure Plan (2023)</li> <li>Mid Sussex Infrastructure Delivery Plan (2022)</li> </ul>
<ul style="list-style-type: none"> <li>Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>The conclusions of the Gatwick Water Cycle Study confirm that the South East remains an area of serious water stress.</li> </ul>

	<ul style="list-style-type: none"> <li>• Water Neutrality affects the Sussex North Water Resource Zone. This extends across much of CBC. MSDC mostly falls outside of this area.</li> <li>• Crawley WwTWs is scored as “red” by Thames Water indicating that future upgrades will be required.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• CBC and MSDC agree that where development with strategic implications is proposed close to the authorities’ common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive development management and maximise infrastructure benefits.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Where strategic development is proposed close to the authorities’ common administrative boundary, the authorities will work together to establish a joint Planning Policy position to support positive Development Management and maximise infrastructure benefits.</li> <li>• The authorities agree to jointly explore opportunities through discussions with the relevant Water Companies.</li> </ul>

# Adur District Council / Crawley Borough Council / Worthing Borough Council

## Statement of Common Ground



### Signatories:

Clem Smith Head of Economy & Planning Crawley Borough Council	James Appleton, Head of Planning & Development, Worthing Borough Council

**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.

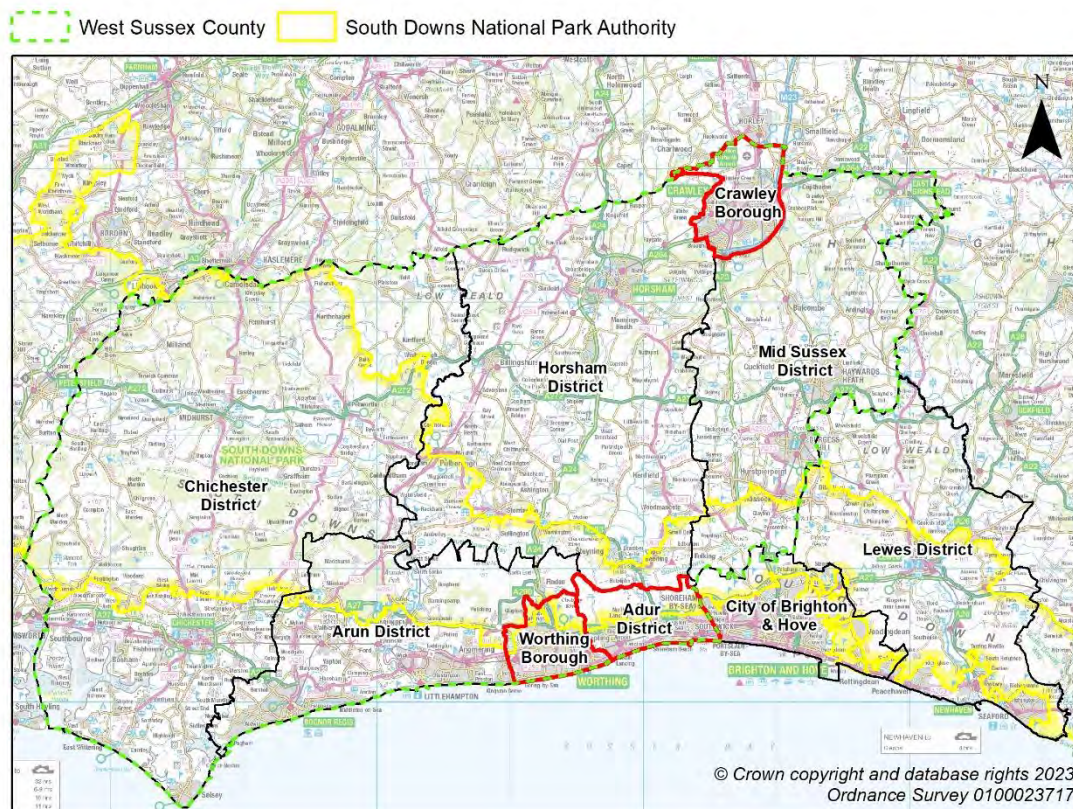


Figure 1: Adur, Crawley and Worthing Local Authority Areas

#### 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.

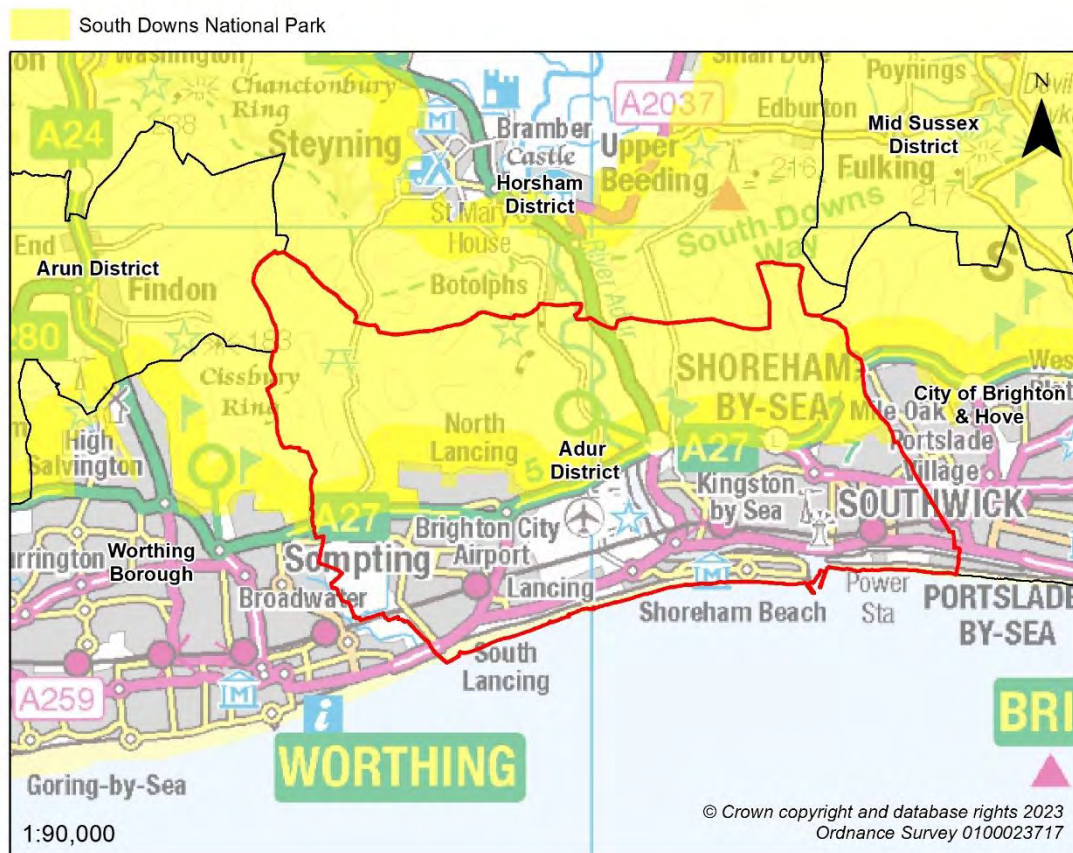


Figure 2: Adur District Council Administrative Area

### 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).

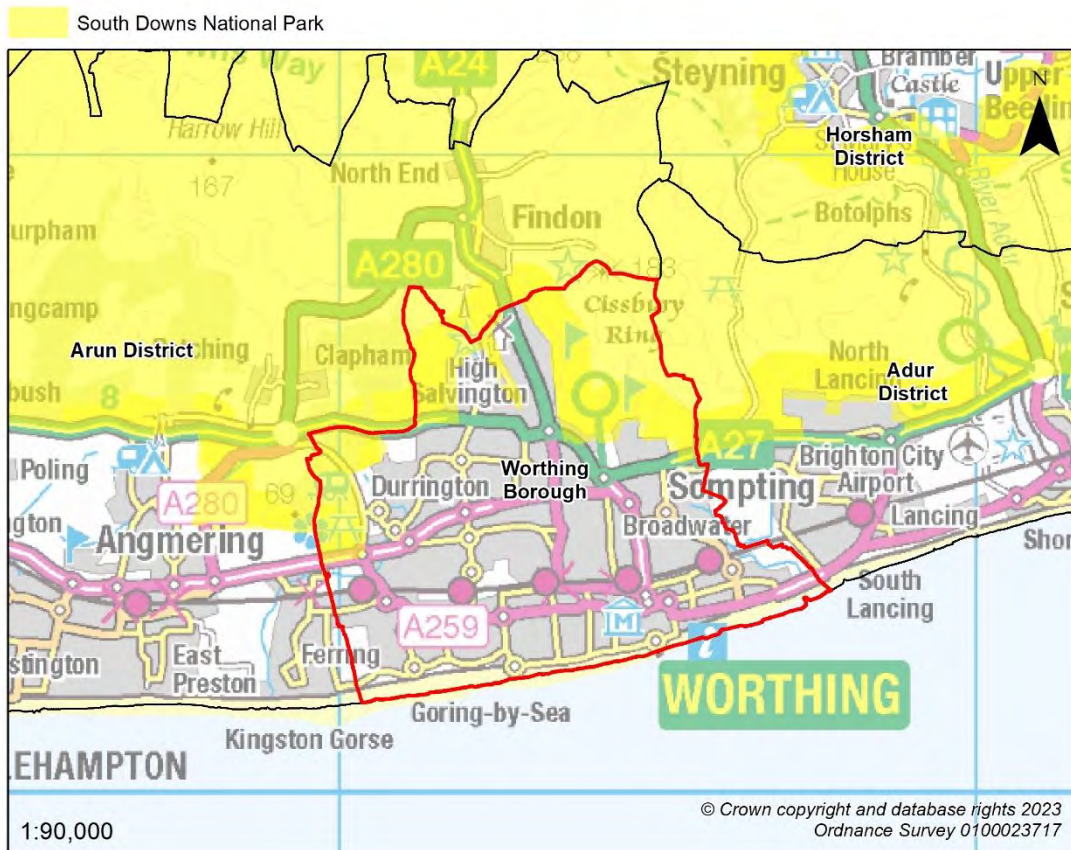


Figure 3: Worthing Borough Council Administrative Area

### 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.

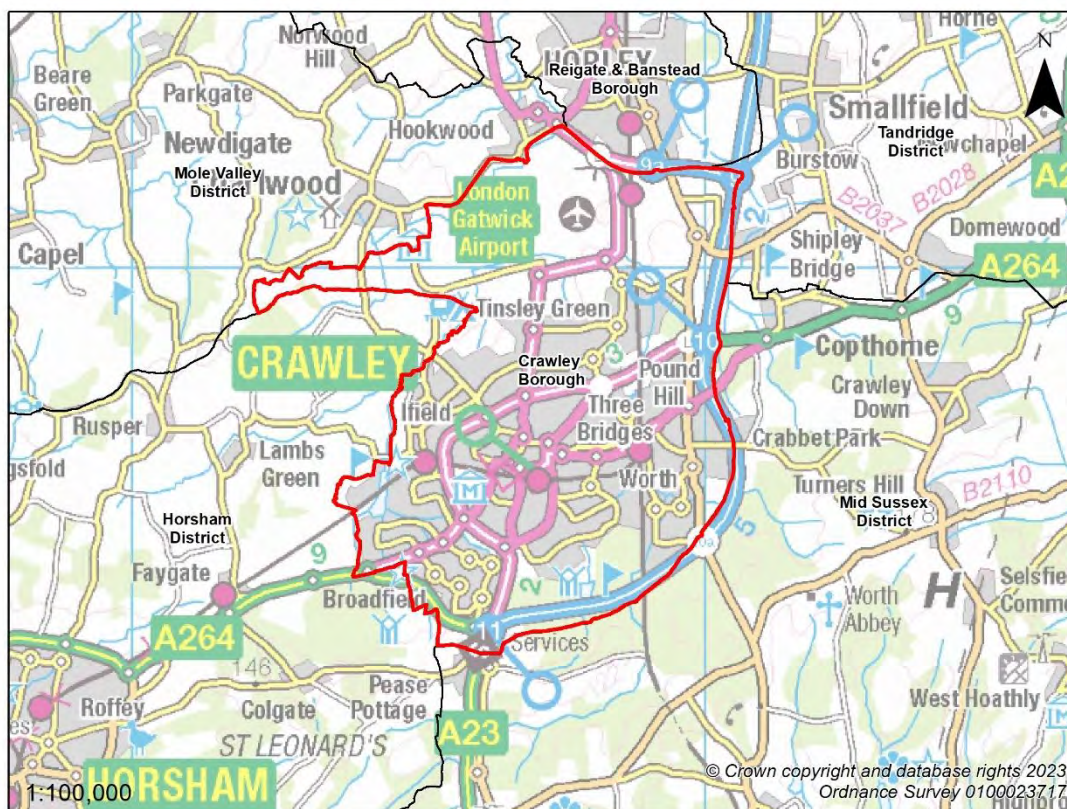


Figure 4: Crawley Borough Council Administrative Area

### 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 Ground<sup>1</sup> (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 28<sup>th</sup> 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

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<sup>1</sup> <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

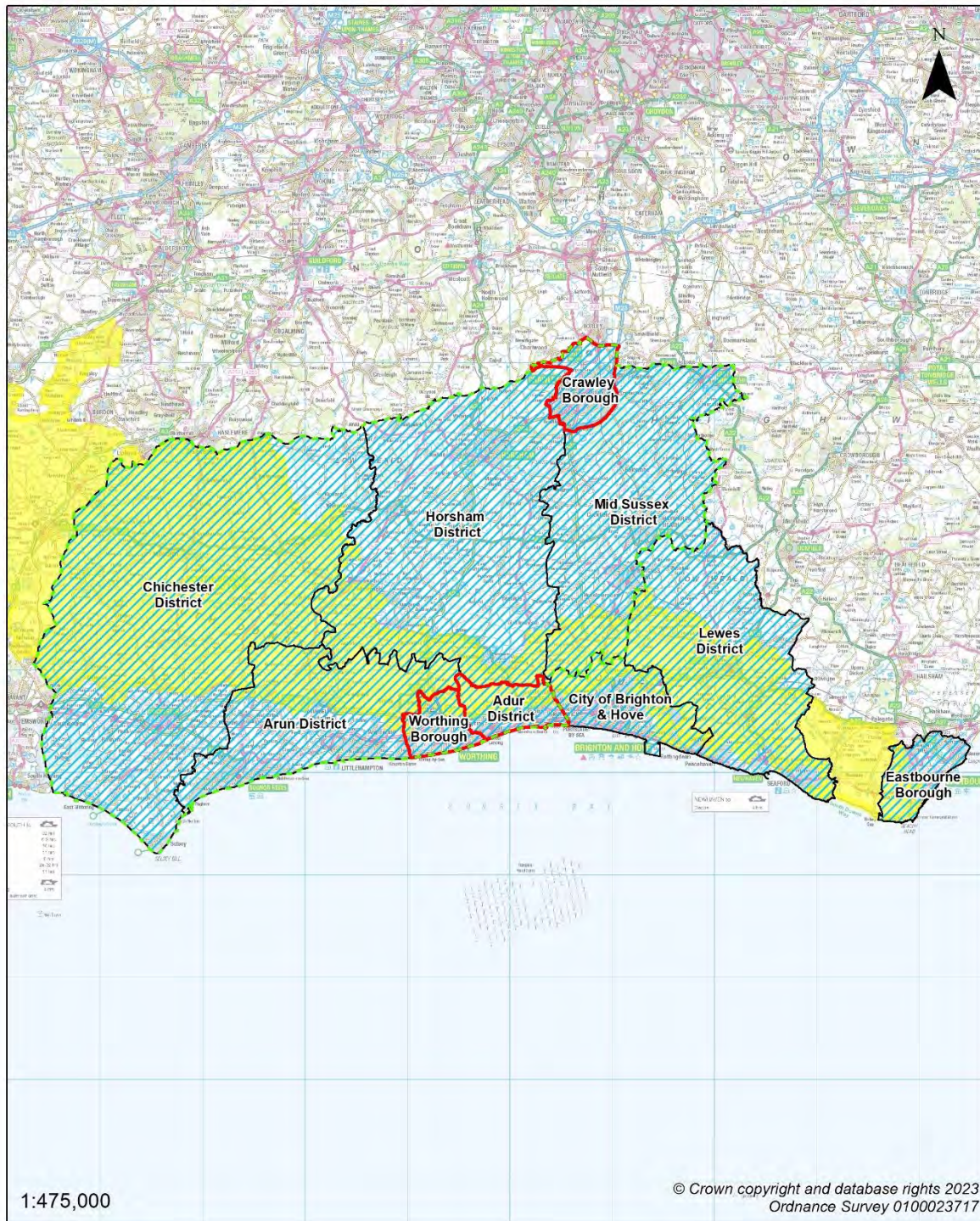


Figure 5: West Sussex and Greater Brighton Authorities Map

**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.

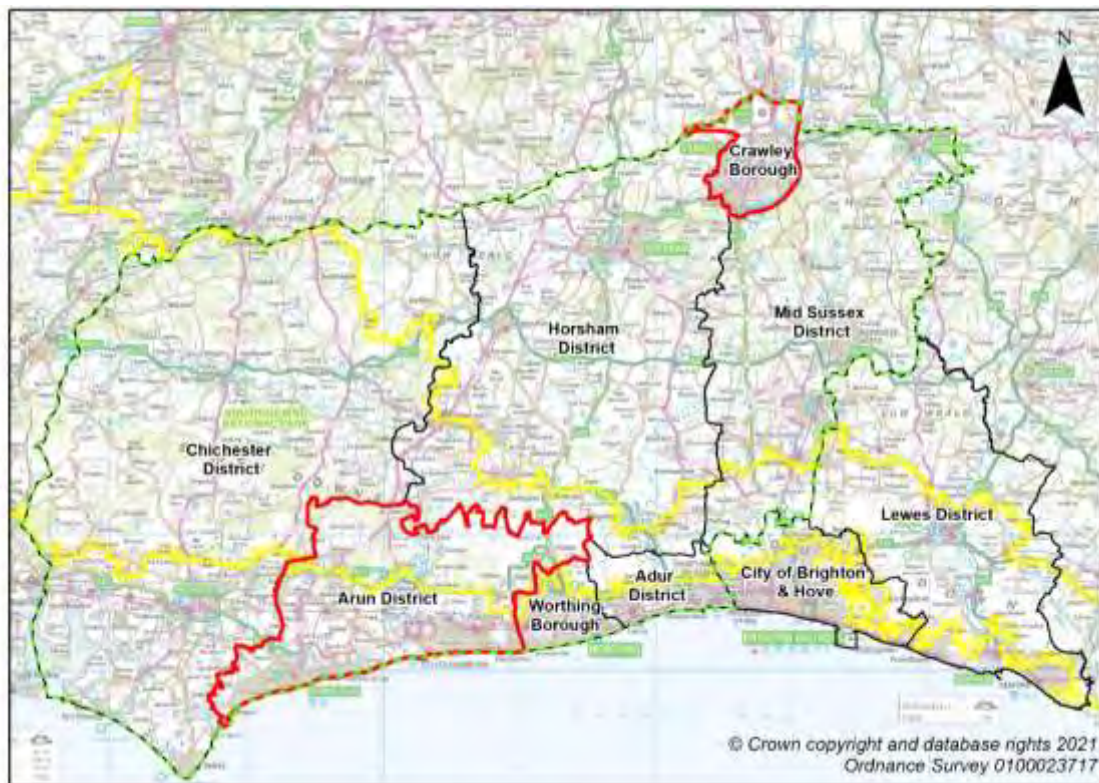
Crawley is a land-constrained borough, due to its tight administrative boundaries, the requirement to 'safeguard' land south of Gatwick Airport for a potential southern runway, and physical constraints such as aircraft noise, flooding, nature conservation and there being few infill opportunities due 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
<b>Crawley Local Plan</b>	Dec 2015	2019 - 2021	July 2019	Jan 2020/Jan 2021	Autumn 2021
<b>Arun District Local Plan</b>	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 Ground<sup>1</sup> (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

<sup>1</sup> <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"> <li>• Key objective</li> </ul>	<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"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Strategic Housing Market Assessment (2019)</li> <li>• Crawley Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020 Review)</li> <li>• ADC Updated housing Needs Evidence (2016)</li> <li>• Joint Coastal West Sussex GTAA (2019)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley lies within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>

	<ul style="list-style-type: none"> <li>G&amp;T Site identification Study 2019 identified that G&amp;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.</li> </ul>
<ul style="list-style-type: none"> <li>Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>As each of the housing supply or updated housing market evidence is completed, the findings will be shared with between the councils.</li> </ul>

### **Employment and economic development:**

#### *Crawley Economic Growth Assessment (2020)*

The NWS Economic Growth Assessment (EGA)<sup>2</sup> 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

<sup>2</sup> 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"> <li>• Key objective</li> </ul>	<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"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Economic Growth Assessment (January 2020)</li> <li>• Crawley Focused EGA Update (September 2020)</li> <li>• ADC Employment Land Needs Update (2016)</li> <li>• ADC Defining the HMA and FEMA Greater Brighton and Coastal West Sussex Strategic Planning Board (2017)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• The NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA).</li> <li>• Influential economic linkages also exist with Coastal West Sussex, East Surrey and East Sussex.</li> <li>• 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.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• The CBC submission Local Plan seeks to meet the most recently identified office and industrial (storage and distribution) needs in their borough.</li> <li>• 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.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>



### 1. List of Parties involved:

- Crawley Borough Council (CBC)
- Reigate and Banstead Borough Council (RBBC)

### 2. Signatories:



29.01.21

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



05.02.21

**Reigate and Banstead Borough Council**  
**Councillor Richard Biggs, Portfolio Holder for Planning Policy**

### 3. Strategic Geography

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

CBC and RBBC share a common boundary across the Surrey/West Sussex county border. Gatwick Airport, and associated safeguarded land, along with areas of Rural Surrounds of Horley and Metropolitan Green Belt, separates the main settlements in each of the authority areas.

Both authorities are located within the Gatwick Diamond sub-region and within the Coast to Capital Local Enterprise Partnership (LEP) Area. The two authorities have a long history of positive and active engagement on cross-boundary matters, including through Statements of Common Ground reached through the Reigate and Banstead Core Strategy (adopted 2014 and reviewed 2019) and the Crawley Borough Local Plan 2015-2030<sup>1</sup>.

<sup>1</sup> Statement of Common Ground on meeting strategic housing needs (2013) RBBC/CBC

<https://crawley.gov.uk/sites/default/files/documents/PUB231177.pdf>

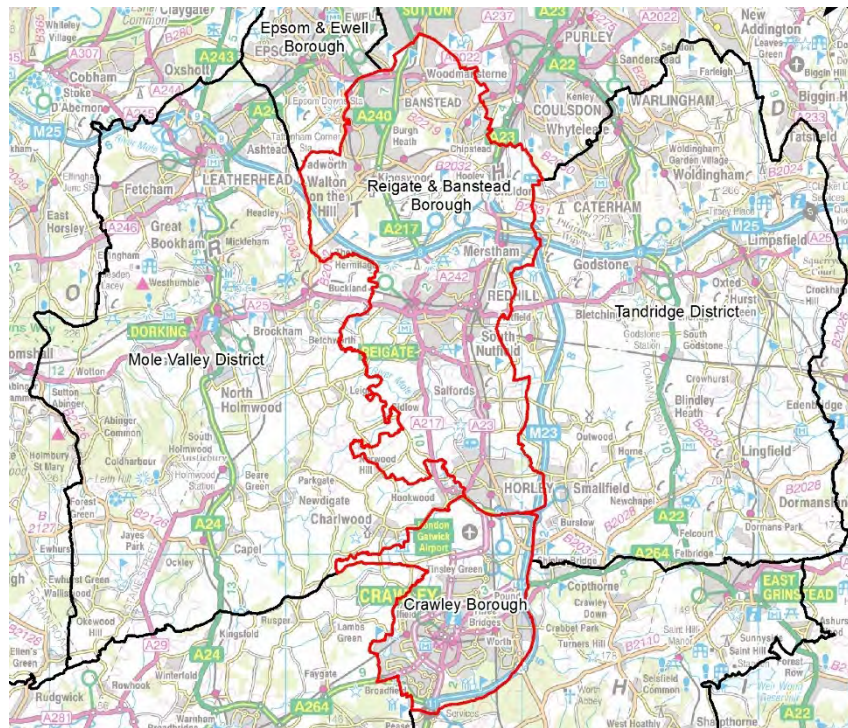
Statement of Common Ground on meeting the Duty to Cooperate and Retail Issues relating to Reigate and Banstead Borough Council draft Core Strategy (2013) RBBC/CBC

<https://crawley.gov.uk/sites/default/files/documents/PUB231179.pdf>

Statement of Common Ground between Crawley Borough Council and Reigate and Banstead Borough Council on the submission Crawley Local Plan (December 2014) CBC/RBBC

<https://crawley.gov.uk/sites/default/files/documents/PUB241111.pdf>

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



A scale map of the Gatwick Diamond 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 affordable housing and Gypsy, Traveller and Travelling Showpeople needs, across the respective Housing Market Areas (East Surrey Housing Market Area and North 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 continue and develop the existing shared approach to Gatwick Airport, having regard to its economic and social benefits, and also its environmental impacts including those relating to air quality, noise pollution, and surface access;
- to develop an agreed position on the transport impacts of strategic allocation sites;
- to establish a common and agreed position on secondary education;
- to identify and develop opportunities for health provision if required through evidence;
- to develop an agreed position on cross boundary flooding impacts;
- 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 and RBBC is located in the East Surrey Housing Market Area.

2. There is some relationship between the North West Sussex Housing Market Area and the Horley area. However, RBBC as a whole falls within the East Surrey Housing Market Area.
3. A robust and appropriate Strategic Housing Market Assessment has been completed for each local authority.
4. 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.
5. Where each party 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. CBC and RBBC will engage through the Gatwick Diamond 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.
6. As each authorities' respective housing supply or updated housing market evidence is completed, the findings will be shared with the councils.
7. 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 6,680 dwellings (417.5dpa) to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development. The adopted RBBC Local Plan includes a constraints-based housing requirement to deliver at least 460dpa. Whilst it is recognised in Paragraph 7.4.3 of the Core Strategy and Paragraph 67 of the Core Strategy Inspector's Report that this allows for some continuing in-migration from other local authorities including those within the East Surrey and North West Sussex Housing Market Area (at a total of around 90-130 dwellings per annum). RBBC's adopted Local Plan does not seek to meet a specified quantum of CBC's unmet need.
8. The RBBC adopted Development Management Plan (DMP) includes three Sustainable Urban Extensions within/ajoining Horley (NWH1, NWH2 and SEH4), these are allocated to meet housing needs in RBBC.
9. CBC is not in a position to meet any unmet housing need that may arise from further work for RBBC.
10. RBBC is not in a position to meet any of CBC's unmet housing need.
11. Both authorities will each seek to meet their own need for additional Traveller provision.

**Employment, economic development and retail:**

The parties agree:

12. CBC is located within the Northern West Sussex Functional Economic Market Area. Work undertaken to inform the RBBC Core Strategy determined that RBBC's Functional Economic Marke Area was primarily the Gatwick Diamond area, reflecting the influence of Gatwick Airport. However, this work also recognised the strong influence of London on the borough's economy generally (particularly in terms of commuting), but also more localised relationships with Sutton and Croydon.
13. The adopted RBBC Development Management Plan allocates Horley Strategic Business Park to meet strategic office needs, including 45,513sqm of the unmet strategic office need identified in the Crawley Borough Local Plan 2015. Horley Strategic Business Park is not able to accommodate Crawley's current industrial or storage & distribution needs.

14. A robust 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.
15. 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. Any supporting limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial (storage and distribution) function would need to demonstrate that the proposal would be complementary to the Horley Strategic Business Park; and not have a significant adverse impact on the vitality and viability of, or consumer choice and trade within, existing town centres and existing, committed and planned public and private investment in those centres.
16. As any updated economic evidence for Crawley BC is completed, the findings will be shared between the councils.
17. The "Town Centre First" approach for each authority is appropriate and neither are proposing strategic scale retail development. As any updated retail evidence is completed for Crawley BC, the findings will be shared.

#### **Gatwick Airport**

The parties agree:

18. Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.
19. As part of the submission Local Plan, CBC propose to allocate 47ha of land east of Balcombe Road, and south of the M23 Spur, referred to as Gatwick Green, for a strategic employment site. This site is identified by the Gatwick Airport Masterplan (2019) for safeguarding as to be utilised for a large area of surface car parking. CBC does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of their borough, and is of the view that the airport could accommodate parking more efficiently through decked parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement. Therefore, the CBC submission Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur.
20. Airport related parking should be located on-airport as the most sustainable location and should be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.
21. The appropriate noise contours for decision-making are the Gatwick Master Plan 2019 Additional Runway Summer Day 2040 contours (Plan 31) until such time as these are superseded by subsequent noise contours that are published by Gatwick Airport and approved by the CAA.
22. Each authority will work collaboratively with Gatwick Airport, the other Gatwick local authorities and the LEP to:
  - understand and respond to the impacts of the current economic crisis; and
  - understand the implications of the proposed Northern Runway Nationally Significant Infrastructure Project (NSIP) on the environment, community and economy, and to respond to the Development Consent Order (DCO) application.
23. They will work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal

Agreement, to share expertise on airport related matters including noise, air quality and parking.

### **Education**

The parties agree:

24. Planning for education in Crawley borough will require discussions between the authority areas (CBC and RBBC), involving the Surrey and West Sussex County Councils and the Department for Education.

### **Health**

The parties agree:

25. Planning for health provision will require discussions across the two authority areas (RBBC, CBC), involving the NHS England South (South East), Surrey Heartlands CCG, and NHS West Sussex CCG, along with the Primary Care Networks relevant to each borough.

### **Flooding**

The parties agree:

26. Cross boundary flooding matters will be worked on at a strategic mitigation level, alongside the two County Lead Local Flood Authority (Surrey and West Sussex), in particular within the Burstow Stream catchment.

### **Strategic Sites – Transport and Infrastructure**

The parties agree:

27. Where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together, along with the two county councils (Surrey and West Sussex) and Highways England, to establish a joint planning policy position to support positive and sustainable development management and maximise infrastructure and sustainability benefits.
28. They will continue to discuss any impacts on the strategic road network particularly the M23, the A23 and the local road network, including Balcombe Road.
29. They will jointly explore opportunities for transport improvements through discussions with Surrey and West Sussex County Councils.
30. Robust transport modelling will be used to ensure that growth will not result in severe transport impacts upon the road networks in CBC and RBBC.
31. They will continue to work together to consider any impacts on other infrastructure, such as water supply and waste water.

## **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:

- Gatwick Diamond Authorities Partnership;
- Gatwick Greenspace Partnership; and
- Gatwick Joint Local Authorities Group and Gatwick Officers Group.

This Statement of Common Ground is signed at planning portfolio holder member level and will be reviewed at each key stage of plan-making. It will be updated to reflect progress made through effective cooperation.

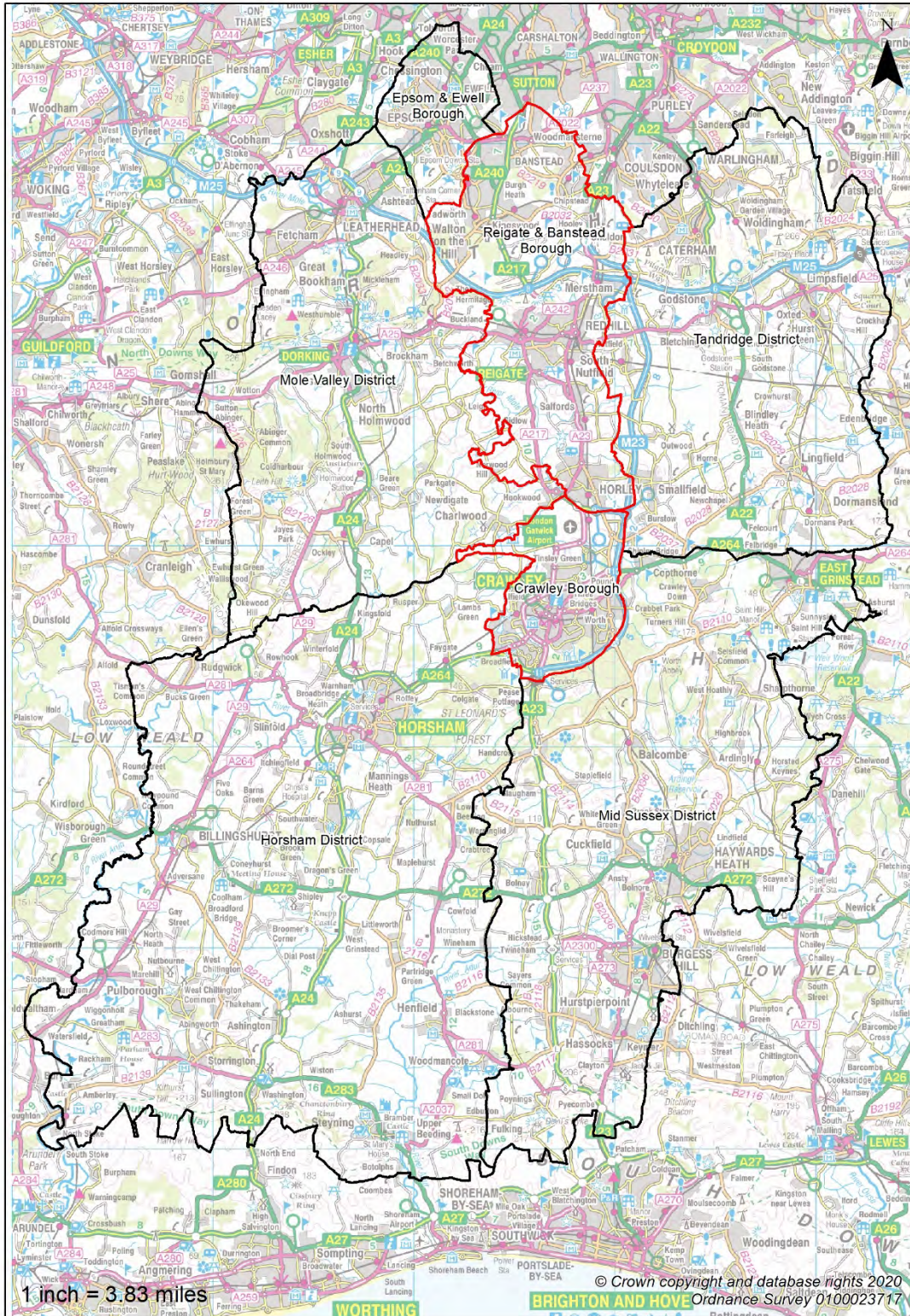
In terms of governance, the authorities agree to:

32. continue to work with the other Gatwick Diamond authorities on housing, employment, Gatwick Airport and other strategic issues affecting the Gatwick Diamond as a whole;
33. work collaboratively on plan preparation and evidence, whilst acknowledging others' timetables and timescales.
34. respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities;
35. meet at member and officer level to review the situation and respond to new issues and changing circumstances; and
36. 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
<b>Crawley Local Plan</b>	Dec 2015	2019 - 2021	July 2019	Jan 2020/Jan 2021	Mar 2021
<b>Reigate and Banstead Core Strategy (CS)</b>	July 2014	Five Year Review Undertaken July 2019			
<b>Reigate and Banstead Development Management Plan (DMP)</b>	September 2019	-	-	-	-

# APPENDIX A - GATWICK DIAMOND AUTHORITIES



## APPENDIX B: BACKGROUND SUPPORTING CONTEXT

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.

RBBC is a Surrey authority that extends from the London boroughs of Sutton and Croydon in the north to Crawley in the south with Epsom and Ewell and Mole Valley to the west and Tandridge to the east. Much of the northern half of the borough is a combination of Green Belt Land and the Surrey Hills Area of Outstanding Natural Beauty (AONB), Areas of Great Landscape Value (AGVL) and Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). Defra and Natural England are planning to start work in 2021 to review the AONB boundary including consideration of land within RBBC currently designated as AGLV. DMP Policy NHE1 'Landscape Protection' states that any AGLV remaining after the AONB Boundary Review will thereafter be treated as a local landscape designation.

The current Reigate & Banstead Core Strategy (2014 and reviewed in 2019) identifies a number of Sustainable Urban Extensions to the south west from Reigate, north west of Horley and to the east of Redhill and Merstham. These are allocated to meet needs arising within RBBC and in accordance with the forward-looking mechanism in DMP Policy MLS1, will be 'released' for development when the Council's Housing Monitor (published annually in June) predicts that a five year housing supply will not be maintained over the next year and subsequent year.

As recognised by RBBC's Core Strategy Inspector, the southern part of Reigate and Banstead borough is constrained by areas at high risk of flooding and the capacity of Horley to absorb any more housing at the present time (Core Strategy Inspector Report Paragraphs 15 and 44). Significant areas in the south of the borough, around Horley are designated as Rural Surrounds of Horley in the DMP. This is protected countryside in accordance with national policy, which recognises the intrinsic character and beauty of the countryside.

The authorities work with partners in the wider 'Gatwick Diamond'<sup>2</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 Memorandum of Understanding and Local Strategic Statement<sup>3</sup>, which was reviewed and updated in 2016.

CBC submitted representations to the RBBC DMP and participated in the Examination for that Plan. Representations were received from RBBC to the Regulation 18, Early Engagement CBC Local Plan Review (July – September 2019) as well as the Initial Regulation

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<sup>2</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>3</sup> Which can be accessed from each of the Gatwick Diamond Authorities' websites:

Crawley - <https://crawley.gov.uk/planning/planning-policy/planning-policy-evidence/gatwick-diamond-local-strategic-statement>

Reigate and Banstead -



19, Publication Consultation (January – March 2020). Technical evidence has been shared from both authorities for input as part of its preparation.

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 and noise issues, on and off airport parking and surface access. This discussion is secured by way of a S106 legal agreement between CBC, WSCC and Gatwick Airport Limited, with a commitment to joint working between the Gatwick Local Authorities set out within an accompanying Memorandum of Understanding. The authorities are also working collaboratively with regard to the Airport's ongoing Development Consent Order (DCO) application relating to the operational use of the northern 'standby' runway, and to consider the economic impacts of the Covid-19 pandemic, given its significance for the aviation and related sectors.

Effective outcomes of this joint working includes:

- success at planning appeals across boundaries;
- securing financial contributions and commitments from the airport to increase the modal share of passengers and staff accessing the airport by sustainable transport, supporting major schemes like Gatwick station improvements and smaller improvements to public transport services; and
- financial support and sharing of expertise in relation to the monitoring of air quality and noise impacts associated with the airport.

The authorities participate as members of the Gatwick Greenspace Partnership<sup>4</sup>. Gatwick Greenspace is a community project managed by Sussex Wildlife Trust as one of its "Living Landscape Projects" to benefit people, wildlife and the countryside between Horsham, Crawley, Horley, Reigate and Dorking.

### **Strategic Matters**

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

- housing need, including overall housing need, affordable housing need and the needs for specialised housing;
- employment and economic development, including employment land and floorspace needs, retail and Gatwick Airport;
- strategic sites and/or sites on the boundaries between authorities and specific aspects of infrastructure development, including transport, flooding, water supply and waste water treatment, education and health; and
- environmental impacts, including flooding, and airport-related air quality and noise pollution.

These have been refined into the detailed strategic objectives.

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<sup>4</sup> alongside Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Horley Town Council, Surrey County Council, West Sussex County Council, Sussex Wildlife Trust and Gatwick Airport Limited.

**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 12,000 dwellings (based on 750 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 6,680 dwellings (417.5dpa) to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

The land currently subject to safeguarding for future potential runway expansion to the south at Gatwick Airport has only limited opportunities for future housing development, even in a scenario where some or all of safeguarding were removed and a southern runway were not to be progressed. This is due to the noise contours associated with the existing runway, which the Regulation 19 Local Plan finds to be unacceptable where noise exposure is greater than 60dB. This limits the extent of development to the north of the existing Built-Up Area Boundary for Crawley to small pockets under the existing 60dB noise levels.

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.

RBBC's adopted Local Plan includes a constraints-based housing requirement to deliver at least 460dpa over the plan period against an identified objectively assessed housing need of 600-640dpa. This will be delivered through town centre and urban area site allocations, sustainable urban extensions and windfall development.

In accordance with paragraph 137c of the NPPF 2019, all other reasonable options for meeting housing need must be examined before concluding exceptional circumstances exist to justify changes to Green Belt boundaries. Therefore, where neighbouring authorities, particularly within the NWS HMA are not constrained by Green Belt, and are capable of meeting their own housing needs, then this should be the first instance for exploring and accommodating unmet needs.

The constrained land supply and high housing need, which strongly characterise and influence planning within Crawley borough, demonstrate that CBC is unable to help RBBC meet their unmet need. Similarly, due to the constraints within the borough RBBC is unable to assist in meeting Crawley's unmet needs. However, both councils will continue to work together to consider where unmet need could be met in the future.

LPA	MHCLG LHN	Local Plan target	Plan status	Year	Plan period
<b>Crawley</b>	750	332.5	Reg.19 Consultation	2021/22	2021-2037
<b>Reigate and Banstead</b>	644/1,148	460 <sup>5</sup>	Adopted Reviewed	2014 2019	2012-2027
<b>Totals</b>	<b>1,394/1,898</b>	<b>792.5</b>			

#### Affordable housing:

- The recent Strategic Housing Market Assessment for Crawley highlighted an affordable housing need emerging from the borough of a total of 739 dwellings per year. Even with the council meeting the affordable housing plan target of 40% for the housing delivery anticipated within the borough, this leaves a substantial amount of unmet affordable housing need arising and unmet. Viability evidence being prepared to support the Local Plan is highlighting the challenges in securing 40% for town centre and high density schemes (due to high existing land values and high costs for higher rise development), leading to a reduction in the levels of affordable housing which can be required through such private market led schemes.
- RBBC's adopted Local Plan seeks to provide between 2012 and 2027 a minimum of 1,500 gross new affordable homes within the borough (100dpa) (DMP Policy DES6 'Affordable Housing) against an identified affordable housing need of 366dpa.

#### Self- and Custom-Build housing:

- Due to Crawley's predominantly urban nature, with a high proportion of higher density residential schemes proposed, and the limited area of land around the existing Built-Up Area Boundary, with the exception of the land affected by aircraft noise constraints, there are limited opportunities for self-build to take place within the borough's administrative boundaries. The current number of individuals and groups on the council's Self- and Custom-Build Register is 90; of which 73 are Part 1 entries (i.e. those which satisfy local eligibility criteria) and a further 17 are Part 2 entries.
- Reigate and Banstead has two allocated sites east of Merstham where the provision of self build housing is encouraged (DMP (2019) Policies ERM4a and ERM5) . Furthermore by identifying approved housing developments which have the CIL self and custom build housing exemption, RBBC considers such approved housing developments are meeting the self build needs identified on the Council's Self Build Register.

#### Gypsy, Traveller & Travelling Showpeople:

- In 2011, the Gatwick Diamond authorities (which include Crawley, Mid Sussex, Horsham, Tandridge, Reigate & Banstead and Mole Valley) agreed to seek to meet their own need for additional Traveller provision. As part of the Gatwick Diamond Authorities, the authorities meet to discuss matters including Traveller issues and share information.
- 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. A site is currently being safeguarded

<sup>5</sup> Reigate and Banstead Core Strategy and Review

through the Crawley Local Plan to meet the potential future needs arising from the existing population within Crawley, and this is proposed to continue through into the Reviewed LP.

- Reigate and Banstead has allocated sufficient sites to meet its requirements for gypsies and travellers meeting the PPTS definition, as well as those identified future needs who do not, but who would require provision under wider Equality Act requirements.

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	<p>Working collaboratively on Housing Need including affordable housing across two Housing Market Areas as far as is relevant.</p>
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Strategic Housing Market Assessment (2019)</li> <li>• East Surrey Strategic Housing market Assessment (2008)</li> <li>• Reigate &amp; Banstead Strategic Housing Market Assessment Update (2012) – in relation to Affordable Housing</li> <li>• Crawley Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020 Review)</li> <li>• Reigate &amp; Banstead Borough Council Gypsy and Traveller Accommodation Assessment (2017)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley lies within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts.</li> <li>• RBBC forms part of the East Surrey HMA, which also includes Elmbridge, Epsom and Ewell, Mole Valley and Tandridge.</li> <li>• There are localised links between Crawley and Horley.</li> <li>• 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.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The Gatwick Diamond authorities (which include Crawley, Mid Sussex, Horsham, Tandridge, Reigate &amp;</li> </ul>

	Banstead and Mole Valley) agreed to seek to meet their own need for additional Traveller provision.
<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>As each of the housing supply or updated housing market evidence is completed, the findings will be shared with between the councils.</li> </ul>

### **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.

The NWS Economic Growth Assessment (EGA)<sup>6</sup> concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). The assessment identifies that influential economic linkages also exist with Coastal West Sussex, Reigate and Banstead (Horley) 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.

Strategic employment development at Gatwick Green will be required to come forward in a manner that is complementary to the mixed-use business function of Manor Royal, the vitality and viability of Crawley Town Centre, delivery of the allocated office-led Horley Strategic Business Park in Reigate & Banstead Borough, and other planned strategic employment development in the functional economic market area. The developer will be required to undertake an Impact Assessment to demonstrate how the Strategic Employment Location will address Crawley’s identified need for industrial focused business floorspace, and how its offer will be complementary to existing and planned employment growth in the Gatwick Diamond. Any supporting limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial (storage and distribution) function would need to demonstrate that the proposal would be complementary to the Horley Strategic Business Park; and not have a significant adverse impact on the vitality and viability of, or consumer choice and trade within, existing town centres and existing, committed and planned public and private investment in those centres.

<sup>6</sup> Northern West Sussex Economic Growth Assessment (January 2020) Lichfields  
<https://crawley.gov.uk/sites/default/files/documents/PUB354687.pdf>

The adopted RBBC Local Plan seeks to meet the identified unmet strategic office needs arising from the existing CBC Local Plan (45,513sqm ). CBC proposes to meet its quantitative office needs for the forthcoming planning period in full.

The Horley Strategic Business Park is allocated in the Reigate & Banstead Development Management Plan (DMP) to provide a strategic business park of predominantly offices, a complementary range of commercial, retail and leisure facilities to serve and facilitate the main business use of the site and at least 5ha of new high quality public open space, including parkland and outdoor sports facilities.

The site allocation policy (HOR9) states that the predominant use of the site should be for B1a purposes with limited B1b, B1c, B8 and non-B Class uses including appropriate airport-related Sui Generis uses.

Indicative quanta of development provided within DMP Explanatory Paragraph 3.3.167 includes up to 200,000sqm of B1 floorspace and up to 10,500sqm of community facilities. Paragraph 3.3.171 states that further work on scheme design will need to identify detailed floorspace mix, taking into account economic impact and economic circumstances.

An updated Market demand Study has been commissioned in the light of the Covid-19 pandemic RBBC is currently in the process of producing a site development brief supplementary planning document for the site. This is due for public consultation in summer 2021.

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	<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"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Economic Growth Assessment (January 2020)</li> <li>• Crawley Focused EGA Update (September 2020)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• The NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA).</li> <li>• Influential economic linkages also exist with Coastal West Sussex, Reigate and Banstead (Horley) and East Sussex.</li> <li>•</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• The allocated Horley Strategic Business Park is planned to accommodate the strategic unmet office need (45,513sqm) from the existing CBC Local Plan (2015-2030).</li> <li>• The CBC submission Local Plan seeks to meet the most recently identified office and industrial (storage and distribution) needs in their borough.</li> </ul>

<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• The authorities will continue to work together with the other Gatwick Diamond authorities on housing, employment and other strategic issues affecting the Gatwick Diamond as a whole.</li> </ul>
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**Gatwick Airport:**

Safeguarding

As there is no new Aviation Strategy and because, in February 2020, the Court of Appeal determined that the Airports National Policy Statement regarding Heathrow is unlawful and has no legal effect, the national policy with regard to safeguarding remains as set out in the 2013 Aviation Policy Framework. This states “*Land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the Government has established any relevant policies and proposals in response to the findings of the Airports Commission*”. Local Plans must be in conformity with the relevant national policy. Safeguarding has a significant impact on Crawley Borough’s ability to meet its economic needs. The published Gatwick Airport Masterplan identifies an extensive area east of the airport solely for surface parking, which CBC considers to be an inefficient use of land in such a land constrained borough, particularly given Crawley’s business land needs. The draft submission Local Plan therefore removes this area from safeguarding and allocates it as a strategic employment location to meet Crawley’s industrial (storage and distribution) employment needs.

Airport related parking

The airport operator is achieving the target of 48% non-transfer passengers arriving at the airport by public transport, but this still requires a significant amount of on-airport parking facilities for those passengers that choose to access the airport by private car. There are some authorised sites off-airport, but also many unauthorised sites, or requests for planning permission. Sites within the airport boundary provide the most sustainable location for any additional long stay parking as they are close to the terminals and can help reduce the number and length of trips. The Airport operator is responsible for meeting the modal split target and it is important that the level of provision of car parking spaces can be appropriately managed. The Gatwick Local Authorities work together with GAL to undertake an Annual Parking Survey of on and off airport parking provision (authorised and unauthorised) and participate in the Surface Access Forum.

Gatwick Airport Economic Recovery and Growth

The local authorities neighbouring the airport work together at officer (the Gatwick Officers Group) and member (the Gatwick Joint Local Authorities) level, as well as the Chief Executives and leaders meeting regularly and the authorities taking part in the Gatwick Airport Consultative Committee (GATCOM). The authorities, GAL, and the LEP are currently working together to understand the impacts of the current economic crisis caused by the Covid-19 pandemic which has been particularly significant in the Crawley area due to its reliance on aviation and related employment sectors. The authorities are also collaborating to understand the implications of the proposed Northern Runway NSIP project on the environment, community and economy, and to respond to the DCO application to ensure that Gatwick Airport and the Planning Inspectorate are aware of the councils’ positions in relation to the opportunities and implications associated with airport growth.

### Environmental protection

GAL, West Sussex County Council and Crawley Borough Council have signed a joint S106 Legal Agreement to ensure that, as the airport grows as a single runway, two-terminal airport, its short and longer-term environmental impacts are minimised, and to maintain and enhance the ways the parties share information and work together and with other stakeholders to bring benefits to the airport and the communities it serves and affects. The S106 includes matters such as Climate Change, Air Quality, Noise, and Surface Access. The other neighbouring authorities are party to the Memorandum of Understanding supporting the S106.

<ul style="list-style-type: none"><li>• Key objective</li></ul>	To develop a shared approach to Gatwick Airport including the impact of air quality and noise pollution.
<ul style="list-style-type: none"><li>• Relevant studies, intelligence or evidence base completed or to do</li></ul>	<ul style="list-style-type: none"><li>• Annual Airport Parking Surveys</li><li>• Gatwick Airport Masterplan 2019</li><li>• Gatwick Airport, WSCC, CBC Section 106 Legal Agreement 2018</li></ul>
<ul style="list-style-type: none"><li>• Key conclusions from the evidence</li></ul>	<ul style="list-style-type: none"><li>• Gatwick Airport influences the environment, economy and community in the area</li></ul>
<ul style="list-style-type: none"><li>• Agreement that has been reached or progress made</li></ul>	<ul style="list-style-type: none"><li>• Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.</li><li>• Airport related parking should be located on-airport as the most sustainable location, and should be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.</li></ul>
<ul style="list-style-type: none"><li>• Any further actions / governance requirements etc.</li></ul>	<ul style="list-style-type: none"><li>• The authorities will continue to work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal Agreement, to share expertise on airport related matters including noise, air quality and parking.</li></ul>

### **Education:**

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). 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 6-8 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.



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

Reigate and Banstead has sufficient secondary school places and primary school places (with the site allocation) as summarised in its Infrastructure Delivery Plan (Nov 2017), and summarised in the DMP Inspector's Report (9 July 2019) (paragraph 77).

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	<p>To establish a common and agreed position of Secondary Education.</p>
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley draft Infrastructure Plan (2020)</li> <li>• RBBC DMP Infrastructure Delivery Plan (Nov 2017)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• CBC has needs for secondary education provision within the vicinity over their Local Plan period.</li> <li>• Crawley has substantial needs, which are concentrated towards the early part of their plan period.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• Assessments of the need for secondary school forms of entry within the vicinity have been undertaken for CBC and RBBC.</li> <li>• CBC and RBBC agree that planning for secondary education will require discussions across the three authority areas (MVDC, CBC, RBBC), involving the County Councils and the Department for Education.</li> <li>• As summarised in as summarised in RBBC's DMP Infrastructure Delivery Plan (Nov 2017), and the DMP Inspector's Report (9 July 2019) (paragraph 77), R&amp;B borough has sufficient existing and planned provision to meet its needs.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Discussions to be arranged across the three authority areas (MVDC, CBC, RBBC), involving the County Councils and the Department for Education.</li> </ul>

**Health:**

There are recognised capacity constraints on GP provision across Crawley borough , 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) is anticipated by the NHS West Sussex CCG to enhance capacity.

Reigate and Banstead considered its primary health care needs for its DMP, and these are summarised in its Infrastructure Delivery Plan (Nov 2017).

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	<p>To identify and develop opportunities for Health provision if required through evidence.</p>
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley draft Infrastructure Plan (2020)</li> <li>• RBBC DMP Infrastructure Delivery Plan (Nov 2017)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>•</li> <li>• Planning permission was granted in late 2020 for a new medical centre in the new Local Centre within NW Horley / Westvale development.</li> <li>• If this does not get taken up, there may be potential to expand an existing medical centre in Horley as an alternative to serve that development.</li> <li>• Potential options include expansion of Birchwood Medical Centre or Wayside surgery (whose practice boundary already includes the Westvale site) both of which are located on Kings Road in Horley, the Beechcroft site at Victoria Road, or potentially Clerklands surgery in Vicarage Lane.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• CBC and RBBC agree that planning for health provision will require discussions across the two authority areas (RBBC, CBC), involving Crawley Clinical Commissioning Group (CCG), NHS England (SE) and relevant Primary Care Networks as they are established.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Discussions to be arranged across the two authority areas (RBBC, CBC), involving Crawley Clinical Commissioning Group (CCG), NHS England (SE) and relevant Primary Care Networks as they are established..</li> </ul>

### Transport Infrastructure:

There are three key areas including transport interconnectivity between and across the boroughs, capacity of the transport networks and support for more sustainable modes of surface level transport where the two boroughs continue to work together.

<ul style="list-style-type: none"><li>• Key objective</li></ul>	To develop an agreed position on the transport impacts of strategic allocated sites.
<ul style="list-style-type: none"><li>• Relevant studies, intelligence or evidence base completed or to do</li></ul>	<ul style="list-style-type: none"><li>• Crawley Local Plan Transport Modelling (under preparation)</li><li>• Crawley Infrastructure Plan (2020)</li><li>• Crawley New Directions Transport Strategy 2020</li></ul>
<ul style="list-style-type: none"><li>• Key conclusions from the evidence</li></ul>	<ul style="list-style-type: none"><li>• The conclusions of the Crawley Transport Modelling are yet to be finalised. Once known these will be shared and this section will be updated with key issues.</li></ul>
<ul style="list-style-type: none"><li>• Agreement that has been reached or progress made</li></ul>	<ul style="list-style-type: none"><li>• CBC and RBBC agree that where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive development management and maximise infrastructure benefits.</li></ul>
<ul style="list-style-type: none"><li>• Any further actions / governance requirements etc.</li></ul>	<ul style="list-style-type: none"><li>• Where strategic development is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint Planning Policy position to support positive Development Management and maximise infrastructure benefits.</li><li>• The authorities agree to jointly explore opportunities through discussions with Surrey and West Sussex County Councils.</li></ul>

### Water Supply and Waste Water Infrastructure:

<ul style="list-style-type: none"><li>• Key objective</li></ul>	To develop an agreed position on the water supply and waste water impacts of strategic allocated sites.
<ul style="list-style-type: none"><li>• Relevant studies, intelligence or evidence base completed or to do</li></ul>	<ul style="list-style-type: none"><li>• Gatwick Water Cycle Study (2020)</li><li>• Crawley draft Infrastructure Plan (2020)</li></ul>

<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• The conclusions of the Gatwick Water Cycle Study confirm that the South East remains an area of serious water stress. The water supply companies serving Crawley and Reigate and Banstead Borough have confirmed there is sufficient water resources to serve the proposed level of growth, though it is recognised that further work will be required in relation to the Sussex North Water Resource Zone (this does not affect RBBC). Both Crawley and Horley WwTWs are scored as “red” by Thames water indicating that future upgrades will be required.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• CBC and RBBC agree that where development with strategic implications is proposed close to the authorities’ common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive development management and maximise infrastructure benefits.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Where strategic development is proposed close to the authorities’ common administrative boundary, the authorities will work together to establish a joint Planning Policy position to support positive Development Management and maximise infrastructure benefits.</li> <li>• The authorities agree to jointly explore opportunities through discussions with the relevant Water Companies.</li> </ul>

**1. List of Parties involved:**

- Crawley Borough Council (CBC)
- Mole Valley District Council (MVDC)

**2. Signatories:**



**25.01.21**

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



**22.01.21**

***Mole Valley District Council  
Councillor Margaret Cooksey, Cabinet Member for Planning***

**3. Strategic Geography**

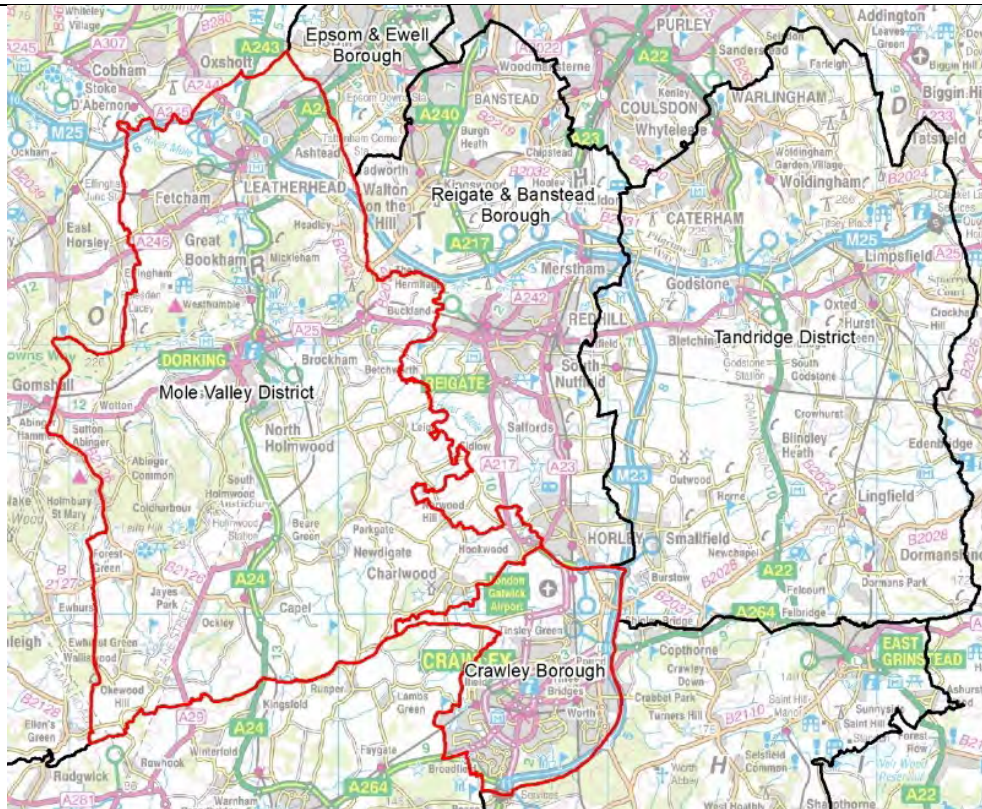
The Statement of Common Ground (SOCG) covers the local authority areas of Crawley Borough Council (CBC) and Mole Valley District Council (MVDC) and is a sound basis for co-operation on strategic cross boundary matters identified in this SOCG.

Crawley and Mole Valley share a common boundary across the Surrey/West Sussex county border. Areas of Metropolitan Green Belt and Gatwick Airport, and associated safeguarded land, separate the main settlements in each of the authority areas.

Although the two local authorities lie within separate Housing Market Areas (HMAs), it is beneficial to prepare a SOCG to deal with the strategic and locally specific cross boundary issues identified in this SOCG.

Both authorities also lie in separate Functional Economic Market Areas (FEMAs). However, both authorities are located within the Gatwick Diamond sub-region and within the Coast to Capital Local Enterprise Partnership (LEP) Area.

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



A scale map of the Gatwick Diamond 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 affordable housing across two Housing Market Areas;
- to establish a common understanding of the employment land requirement and the economic development impact of COVID-19 on the area, notwithstanding that the local authorities lie within two distinct and separate FEMAs;
- to continue and develop the existing shared approach to Gatwick Airport, having regard to its economic and social benefits, and also its environmental impacts including those relating to air quality, noise pollution, and surface access;
- to work jointly to mitigate traffic impacts arising from developments, in conjunction with Surrey County Council Highways, where necessary;
- to establish a common and agreed position on secondary education;
- to identify and develop opportunities for health provision if required through evidence; and
- to develop an agreed position on cross boundary flooding impacts.

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. A robust and appropriate Strategic Housing Market Assessment has been completed for each local authority.

2. Crawley Borough is located in the Northern West Sussex (NWS) Housing Market Area.
3. Mole Valley District is located in the Kingston and North East Surrey Housing Market Area.
4. 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.
5. Where each party 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.
6. As each authorities' respective housing supply or updated housing market evidence is completed, the findings will be shared between the councils.
7. Due to the need to undertake site-specific exceptional circumstances testing to determine whether it is appropriate for individual sites to be released from the Green Belt, it is not currently considered possible to meet any of Crawley's housing needs within Mole Valley.
8. CBC is not in a position to meet any unmet housing need that may arise from further work for the Mole Valley district.
9. They will seek to meet their own need for additional Traveller provision.

#### **Employment and economic development**

The parties agree:

10. Crawley Borough Council is located within the Northern West Sussex Functional Economic Market Area.
11. Mole Valley is located within its own Functional Economic Market Area and the district is not identified as having influential economic connections with NWS authorities.
12. A robust Economic Growth Assessment has been undertaken to identify the employment land requirement for Crawley, and an appropriate economic strategy, including a proposed new strategic employment location, is planned to meet this need within Crawley's boundary.
13. As any updated economic evidence is completed, the findings will be shared between the councils.

#### **Gatwick Airport**

The parties agree:

14. Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.
15. Airport related parking should be located on-airport as the most sustainable location, and should be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.
16. Each authority will work collaboratively with Gatwick Airport, the other Gatwick local authorities and the LEP to:
  - understand and respond to the impacts of the current economic crisis; and
  - understand the implications of the proposed Northern Runway Nationally Significant Infrastructure Project (NSIP) on the environment, community and economy, and to respond to the Development Consent Order (DCO) application.
17. They will work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal Agreement, to share expertise on airport related matters including noise, air quality and parking.

**Education**

The parties agree:

18. Planning for education will require discussions across the three authority areas (MVDC, CBC, RBBC), involving the County Councils and the Department for Education.

**Health**

The parties agree:

19. Planning for health provision will require discussions across the two authority areas (MVDC, CBC), involving the Clinical Commissioning Groups (CCGs).

**Flooding**

The parties agree:

20. Given flooding in Hookwood and the River Mole running beneath Gatwick Airport, cross boundary flooding matters will be worked on at a strategic mitigation level.

**Strategic Sites – Transport**

The parties agree:

21. Where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive and sustainable development management and maximise infrastructure and sustainability benefits.
22. They will jointly explore opportunities for transport improvements through discussions with Surrey and West Sussex County Councils and Reigate and Banstead Borough Council.

**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:

- Gatwick Diamond Authorities Partnership;
- Gatwick Greenspace Partnership; and
- Gatwick Joint Local Authorities Group and Gatwick Officers Group.

In addition, a potential new cross boundary arrangement with education and health involvement will be explored.

This Statement of Common Ground is signed at planning portfolio holder member level 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:

23. to continue to work with the other Gatwick Diamond authorities on housing, employment and other strategic issues affecting the Gatwick Diamond as a whole;
24. to work collaboratively on plan preparation and evidence, whilst acknowledging others' timetables and timescales.
25. to respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities;

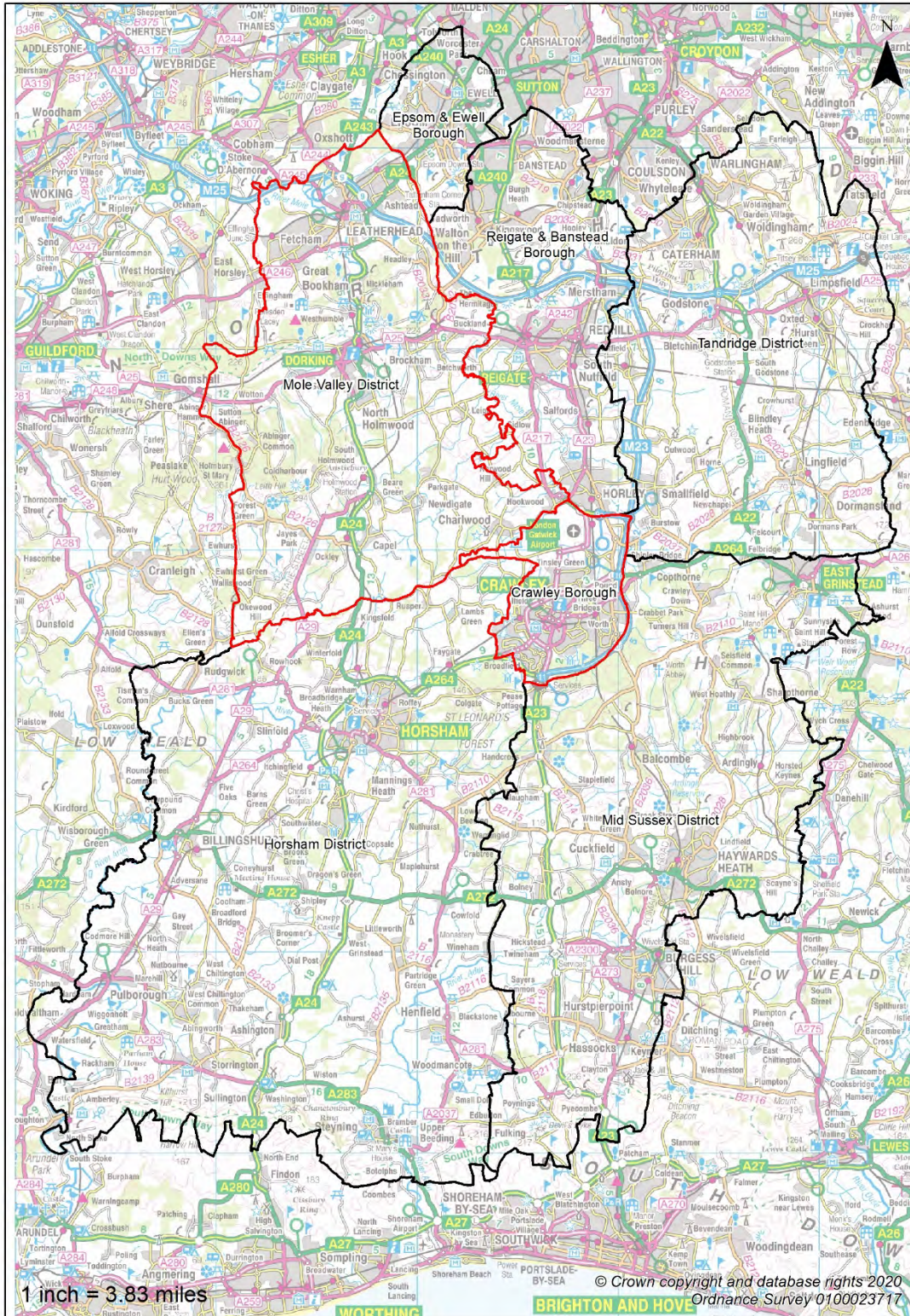


26. to meet at member and officer level to review the situation and respond to new issues and changing circumstances; and
27. to update this SoCG as progress continues through the preparation of the local plans and development plan documents for each of the authorities.

**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
<b>Crawley</b>	Dec 2015	2019 - 2021	July 2019	Jan 2020/Jan 2021	Mar 2021
<b>Mole Valley</b>	<b>2009</b>	<b>2020 - 2022</b>	<b>Feb 2020</b>	<b>June 2021</b>	<b>Sept 2021</b>

# APPENDIX A - GATWICK DIAMOND AUTHORITIES



## APPENDIX B: BACKGROUND SUPPORTING CONTEXT

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.

Mole Valley is also heavily constrained due to 75% of the district falling within the Metropolitan Green Belt. Development in the district is also constrained by landscape and environmental designations, including the Surrey Hills Area of Outstanding Natural Beauty (AONB), which, together with Area of Great Landscape Value, covers about 45% of the district, and the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours associated with Gatwick Airport.

Despite being adjacent authorities, links between the two areas are limited. This is due to weak transport links as well as the large area of Green Belt and Gatwick Airport, and associated safeguarded land, separating the main settlements. These physical barriers contribute to Crawley and Mole Valley each operating in a separate Housing Market Area (HMA) and Functional Economic Market Area (FEMA).

The authorities work with partners in the wider 'Gatwick Diamond'<sup>1</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 Memorandum of Understanding and Local Strategic Statement<sup>2</sup>, which was reviewed and updated in 2016.

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 and noise issues, on and off airport parking and surface access. This discussion is secured by way of a S106 legal agreement between CBC, WSCC and Gatwick Airport Limited, with a commitment to joint working between the Gatwick Local Authorities set out within an accompanying Memorandum of Understanding. The authorities are also working collaboratively with regard to the Airport's ongoing Development Consent Order (DCO) application relating to the operational use of the northern 'standby' runway, and to consider the economic impacts of the Covid-19 pandemic, given its significance for the aviation and related sectors.

Effective outcomes of this joint working includes:

- success at planning appeals across boundaries;

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<sup>1</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>2</sup> Which can be accessed from each of the Gatwick Diamond Authorities' websites:

Crawley - <https://crawley.gov.uk/planning/planning-policy/planning-policy-evidence/gatwick-diamond-local-strategic-statement>

Mole Valley -

- securing financial contributions and commitments from the airport to increase the modal share of passengers and staff accessing the airport by sustainable transport, supporting major schemes like Gatwick station improvements and smaller improvements to public transport services; and
- financial support for the monitoring of air quality and noise impacts associated with the airport.

The authorities participate as members of the Gatwick Greenspace Partnership<sup>3</sup>. Gatwick Greenspace is a community project managed by Sussex Wildlife Trust as one of its “Living Landscape Projects” to benefit people, wildlife and the countryside between Horsham, Crawley, Horley, Reigate and Dorking.

### **Strategic Matters**

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

- housing need, including overall housing need, affordable housing need and the needs for specialised housing;
- employment and economic development, including economic development needs and Gatwick Airport;
- strategic sites and/or sites on the boundaries between authorities and specific aspects of infrastructure development, including transport, flooding, water supply and waste water treatment, education and health; and
- environmental impacts, including flooding, and airport-related air quality and noise pollution.

These have been refined into the detailed strategic objectives.

### **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 12,000 dwellings (based on 750 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 6,680 dwellings (417.5dpa) to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

The land currently subject to safeguarding for future potential runway expansion to the south at Gatwick Airport has only limited opportunities for future housing development, even in a scenario where some or all of safeguarding were removed and a southern runway were not to be progressed. This is due to the noise contours associated with the existing

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<sup>3</sup> alongside Horsham District Council, Mid Sussex District Council, Reigate and Banstead Borough Council, Horley Town Council, Surrey County Council, West Sussex County Council, Sussex Wildlife Trust and Gatwick Airport Limited.

runway, which the Regulation 19 Local Plan finds to be unacceptable where noise exposure is greater than 60dB. This limits the extent of development to the north of the existing Built-Up Area Boundary for Crawley to small pockets under the existing 60dB noise levels.

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.

Mole Valley does not form part of the NWS HMA. This has been confirmed through the most recent Northern West Sussex Strategic Housing Market Assessment (SHMA<sup>4</sup>), which reiterates that the Crawley, Horsham and Mid Sussex continue to represent the geographic extent of the NWS HMA. The 2016 Strategic Housing Market Assessment for Kingston upon Thames and North East Surrey Authorities<sup>5</sup> confirmed that Mole Valley forms a coherent and self-contained HMA with the adjacent boroughs of Elmbridge, Epsom and Ewell and Kingston upon Thames. The SHMA further recognises that there are "strong linkages" between the Kingston and NE Surrey HMA and surrounding authorities, particularly to the south, and that these linkages should be taken into account in developing policy. However, in view of significant subsequent national methodological and policy changes, together with the publication of Mole Valley District Council Housing Strategy 2020 to 2025, consultants completed a SHMA in 2020 to update Mole Valley's housing market evidence.

The draft Future Mole Valley Local Plan confirms MVDC cannot meet its own housing need on brownfield land and/or within the district's existing built-up areas. At this stage, Mole Valley has not identified any opportunities for part of its housing need to be met by neighbouring local authorities. Therefore, having fully explored all other reasonable options for meeting the district's housing need, it has been identified at a strategic level that exceptional circumstances may exist for MVDC to consider some degree of change to Green Belt boundaries. The extent of any such changes remains under consideration. Further work will include the application of exceptional circumstances tests on a site-by-site basis, alongside other relevant matters raised through Mole Valley's Regulation 18 consultation process. It remains possible that MVDC will conclude that local housing need cannot be met need in full and therefore there is an ongoing need to continue exploring cross-boundary options.

In accordance with paragraph 137c of the NPPF 2019, all other reasonable options for meeting housing need must be examined before concluding exceptional circumstances exist to justify changes to Green Belt boundaries. Therefore, where neighbouring authorities, particularly within the NWS HMA are not constrained by Green Belt, and are capable of

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<sup>4</sup> Northern West Sussex Strategic Housing Market Assessment (November 2019) Icen

<https://crawley.gov.uk/sites/default/files/documents/PUB354604.pdf>

<sup>5</sup> <https://molevalley.gov.uk/sites/default/files/2020-05/SHMA%202016.pdf>

meeting their own housing needs, then this should be the first instance for exploring and accommodating unmet needs.

LPA	MHCLG LHN	Local Plan target	Plan status	Year	Plan period
<b>Crawley</b>	750	332.5	Reg.19 Consultation	2020	2021-2037
<b>Mole Valley</b>	453	449 <sup>6</sup>	Reg.18 Consultation	2020	2020-2037
<b>Totals</b>	<b>1,203</b>	<b>781.5</b>			

- **Affordable housing:** The recent Strategic Housing Market Assessment for Crawley highlighted an affordable housing need emerging from the borough of a total of 739 dwellings per year. Even with the council meeting the affordable housing plan target of 40% for the housing delivery anticipated within the borough, this leaves a substantial amount of unmet affordable housing need arising and unmet. Viability evidence being prepared to support the Local Plan is highlighting the challenges in securing 40% for town centre and high density schemes (due to high existing land values and high costs for high rise development), leading to a reduction in the levels of affordable housing which can be required through such private market led schemes.
- **The Mole Valley Strategic Housing Market Assessment 2020 update** identifies an affordable housing need of 746 new homes per year and, in terms of housing mix, the greatest need is for 1- and 2-bedroom market housing and 2- and 3-bedroom affordable housing. There is also a considerable need for older people's leasehold sheltered housing.
- **Specialist housing:** Due to Crawley's predominantly urban nature, with a high proportion of higher density residential schemes proposed, and the limited area of land around the existing Built-Up Area Boundary, with the exception of the land affected by aircraft noise constraints, there are limited opportunities for self-build to take place within the borough's administrative boundaries. The current number of individuals and groups on the council's Self- and Custom-Build Register is 90; of which 73 are Part 1 entries (i.e. those which satisfy local eligibility criteria) and a further 17 are Part 2 entries. Based on evidence of demand through the Self Build Register, it is expected that the necessary number of serviced plots to satisfy the demand in Mole Valley highlighted by the Register will come forward on small sites, single plots on infill sites and other windfall sites. It is anticipated that small windfall sites will play a key role in meeting this demand for self-builders.
- **Gypsy, Traveller & Travelling Showpeople:** In 2011, the Gatwick Diamond authorities (which include Crawley, Mid Sussex, Horsham, Tandridge, Reigate & Banstead and Mole Valley) agreed to seek to meet their own need for additional Traveller provision. As part of the Gatwick Diamond Authorities, the authorities meet to discuss matters including Traveller issues and share information. During preparation of MVDC's 2018 Gypsy and Traveller Accommodation Assessment, stakeholder engagement included consideration of any cross-boundary needs and no specific issues were identified which would change this approach. Similarly, this has continued also to be considered the case through the review of the Crawley Gypsy, Traveller and Travelling Showpeople Accommodation

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<sup>6</sup> Based on MVDC's Regulation 18 consultation draft Local Plan, which consults on potential site allocations that would meet MVDC's LHN in full. However, MVDC has not yet confirmed a Local Plan target and, as set out above, further evidence-gathering, including the application of a site-specific exceptional circumstances test, may lead to MVDC revising the Local Plan housing target at Reg. 19 stage.

Needs Assessment. The MVDC Assessment is currently being updated by the consultants to ensure the most up-to-date assessment of Gypsy and Traveller need is completed for the revised 2020-2037 plan period, as the Local Plan progresses to the submission stage.

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	<p>Working collaboratively on Housing Need including affordable housing across two Housing Market Areas.</p>
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Strategic Housing Market Assessment (2019)</li> <li>• Strategic Housing Market Assessment for Kingston upon Thames and North East Surrey Authorities (2016)</li> <li>• Mole Valley District Council Gypsy and Traveller Accommodation Assessment (2018)</li> <li>• Crawley Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020 Review)</li> <li>• Mole Valley Strategic Housing Market Assessment – 2020 update completed</li> <li>• Mole Valley Gypsy and Traveller Accommodation Assessment – Update – <i>under preparation</i></li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley lies within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts.</li> <li>• Mole Valley forms a coherent and self-contained HMA with the adjacent boroughs of Elmbridge, Epsom and Ewell and Kingston upon Thames.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The Gatwick Diamond authorities (which include Crawley, Mid Sussex, Horsham, Tandridge, Reigate &amp; Banstead and Mole Valley) agreed to seek to meet their own need for additional Traveller provision.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• As each of the housing supply or updated housing market evidence is completed, the findings will be shared with between the councils.</li> </ul>

### **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.

The NWS Economic Growth Assessment (EGA)<sup>7</sup> concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). The assessment also identifies that influential economic linkages also exist with Coastal West Sussex, Reigate and Banstead (e.g. Horley) and East Sussex.

As identified through the Crawley Focussed 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.

Mole Valley is not included within the NWS FEMA nor is the district identified as having influential economic connections with NWS authorities. Its Economic Development Needs Assessment (2017) establishes that the FEMA is Mole Valley Local Authority. In May 2016, the authority consulted neighbouring authorities who confirmed that Mole Valley was not included within their sphere of economic influence. Mole Valley is not included within the NWS FEMA nor is the district identified as having influential economic connections with NWS authorities.

The MVDC Economic Development Needs Assessment confirms that the identified economic development needs of the FEMA to 2033 can largely be met through the currently available and planned floorspace and better utilisation of existing sites in the District. However, as a period of economic uncertainty is entered, adaptability and flexibility in land allocation policy will be key to fulfilling the economic potential of the District. The Economic Development Needs Assessment has recently been updated to take account of additional monitoring data and the impact of the changes to the Use Class Order and Permitted Development Rights on future economic projections and patterns.

There are significant physical and policy constraints on development in the south eastern part of Mole Valley, adjacent to Crawley, which limit the potential for growth in this area. Transport links between Mole Valley and Crawley are weak, mainly comprising rural lanes with limited capacity. The only A-road connections are the A217 and A264/A24. The A217 reduces to a single carriageway north of the CBC boundary and serves only one small settlement (Hookwood) in Mole Valley before continuing north to Reigate. The A264/24 is far from a direct route; the A264 lying to the south of Crawley and connecting to the A24 some 5km south of Mole Valley's boundary. Public transport connections are also weak, with only limited bus services in the rural parts of southern Mole Valley. Gatwick Airport is a major constraint, both in physical terms and in terms of the consequences of air traffic on

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<sup>7</sup> Northern West Sussex Economic Growth Assessment (January 2020) Lichfields  
<https://crawley.gov.uk/sites/default/files/documents/PUB354687.pdf>



the southern part of Mole Valley. The south eastern part of Mole Valley is also significantly impacted by flooding (Flood Zones 2 and 3).

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	<p>To establish a common understanding of the employment Land requirement and the economic development impact of Covid 19 on the area notwithstanding the local authorities lie within two distinct and separate FEMAs.</p>
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Economic Growth Assessment (January 2020)</li> <li>• Crawley Focused EGA Update (September 2020)</li> <li>• Mole Valley Economic Development Needs Assessment (2017) and the 2018 and 2020 Addendums to the Economic Needs Assessment</li> <li>• Mole Valley Economic Needs Assessment – 2020 updated completed</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• The NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA).</li> <li>• Influential economic linkages also exist with Coastal West Sussex, Reigate and Banstead (e.g. Horley) and East Sussex.</li> <li>• Mole Valley is located within its own Economic Market Area.</li> <li>• The district is not identified as having influential economic connections with NWS authorities.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley is planning positively to meet its business land needs within its borough boundary. There are no influential economic connections between Crawley and Mole Valley. Mole Valley is, therefore, not able to physically or effectively accommodate any unmet business land needs from Crawley, should these arise.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• The authorities will continue to work together with the other Gatwick Diamond authorities on housing, employment and other strategic issues affecting the Gatwick Diamond as a whole.</li> </ul>

**Gatwick Airport:**

Safeguarding

Land is required to continue to be safeguarded at Gatwick Airport for a potential future southern runway given the statement in the 2013 Aviation Policy Framework, para. 5.9, that *“land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the Government has established any relevant policies and proposals in response to the findings of the Airport*

*Commission*” and the statement in the draft Aviation Strategy para 3.66 (published in December 2018 after the Airports National Policy Statement) that “*It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth.*” These statements provide no certainty in national policy that safeguarding at Gatwick could be removed.

Safeguarding has a significant impact on Crawley Borough’s ability to meet its economic needs. The published Gatwick Airport Masterplan identifies an extensive area east of the airport solely for surface parking, which CBC considers to be an inefficient use of land in such a land constrained borough, particularly given Crawley’s business land needs. The draft submission Local Plan therefore removes this area from safeguarding and allocates it as a strategic employment location to meet Crawley’s industrial and warehouse employment needs.

#### Airport related parking

The airport operator is achieving the target of 48% non-transfer passengers arriving at the airport by public transport, but this still requires a significant amount of on-airport parking facilities for those passengers that choose to access the airport by private car. There are some authorised sites off-airport, but also many unauthorised sites, or requests for planning permission. Sites within the airport boundary provide the most sustainable location for any additional long stay parking as they are close to the terminals. The Airport operator is responsible for meeting the modal split target and it is important that the level of provision of car parking spaces can be appropriately managed. The Gatwick Local Authorities work together with GAL to undertake an Annual Parking Survey of on and off airport parking provision (authorised and unauthorised) and participate in the Surface Access Forum.

#### Gatwick Airport Economic Recovery and Growth

The local authorities neighbouring the airport work together at officer (the Gatwick Officers Group) and member (the Gatwick Joint Local Authorities) level, as well as the Chief Executives and leaders meeting regularly and the authorities taking part in the Gatwick Airport Consultative Committee (GATCOM). The authorities, GAL, and the LEP are currently working together to understand the impacts of the current economic crisis caused by the Covid-19 pandemic which has been particularly significant in the Crawley area due to its reliance on aviation and related employment sectors. The authorities are also collaborating to understand the implications of the proposed Northern Runway NSIP project on the environment, community and economy, and to respond to the DCO application to ensure that Gatwick Airport and the Planning Inspectorate are aware of the councils’ positions in relation to the opportunities and implications associated with airport growth.

#### Environmental protection

GAL, West Sussex County Council and Crawley Borough Council have signed a joint S106 Legal Agreement to ensure that, as the airport grows as a single runway, two-terminal airport, its short and longer-term environmental impacts are minimised, and to maintain and enhance the ways the parties share information and work together and with other stakeholders to bring benefits to the airport and the communities it serves and affects. The S106 includes matters such as Climate Change, Air Quality, Noise, and Surface Access. The other neighbouring authorities are party to the Memorandum of Understanding supporting the S106.

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	To develop a shared approach to Gatwick Airport including the impact of air quality and noise pollution.
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Annual Airport Parking Surveys</li> <li>• Gatwick Airport Masterplan 2019</li> <li>• Gatwick Airport, WSCC, CBC Section 106 Legal Agreement 2018</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Gatwick Airport has a significant influence on the environment, economy and community in the area</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.</li> <li>• Airport related parking should be located on-airport as the most sustainable location, and should be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• The authorities will continue to work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal Agreement, to share expertise on airport related matters including noise, air quality and parking.</li> </ul>

### Education:

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 WSCC are concerned about relying on these places. 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. 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. 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. Also, notwithstanding the lack of a suitable site for a secondary school within

Crawley, the submission draft 2021 Local Plan 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.

The draft Future Mole Valley Plan identifies three site allocations in Hookwood totalling nearly 500 dwellings. In itself, it is not considered necessary to provide a secondary school. However, SCC have identified that secondary provision is already at capacity and a further 1FE will be required. SCC advises that this does not prevent potential growth in Hookwood, provided this is phased towards the end of the plan period, to allow time for cross boundary education planning. Discussions between the relevant local authorities will be necessary to consider if mutual benefits can be achieved to address the identified gap in education capacity. This would include the relevant district/borough councils, along with both Surrey and West Sussex County Council representatives and potentially the Department for Education.

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	<p>To establish a common and agreed position of Secondary Education.</p>
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley draft Infrastructure Plan (2020)</li> <li>• Mole Valle Infrastructure Delivery Plan (2020)</li> <li>• SCC provided a consultation response on the MVDC Reg.18 Draft Local Plan, which will need to be refined for revised local plan period.</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• CBC and MVDC have needs for secondary education provision within the vicinity over their local plan periods. Crawley has more substantial needs, which are concentrated towards the early part of their plan period. Mole Valley has much more modest requirements in the cross-boundary area and as the strategic site in question is phased towards the end of the plan period more time is afforded for cross boundary education planning.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• Assessments of the need for secondary school forms of entry within the vicinity have been undertaken for CBC and MVDC.</li> <li>• CBC and MVDC have agreed that planning for secondary education will require discussions across the three authority areas (MVDC, CBC, RBBC), involving the County Councils and the Department for Education.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Discussions to be arranged across the three authority areas (MVDC, CBC, RBBC), involving the County Councils and the Department for Education.</li> </ul>

**Health:**

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) is anticipated by the NHS West Sussex CCG to enhance capacity.

Mole Valley is within Surrey Heartlands CCG. MVDC is awaiting further advice on GP provision to support its Local Plan development but the Surrey Heartland CCG's ability to respond to the Reg. 18 consultation has been affected by their Covid-19 workload.

Discussions to date have not highlighted any need for new provision in SE Mole Valley and Surrey Heartlands are taking a similar view on the introduction of PCNs to increase capacity. However, officers have highlighted that Hookwood residents use GPs in other authorities and cross-boundary issues in this part of Mole Valley will need to be addressed.

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	To identify and develop opportunities for Health provision if required through evidence.
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley draft Infrastructure Plan (2020)</li> <li>• Mole Valle Infrastructure Delivery Plan (2020)</li> <li>• Surrey Heartlands CCG have yet to provide a response to the MVDC Reg. 18 Draft Local Plan consultation. Their views are needed to obtain an understanding of Mole Valley's need for GP provision within the area.</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• MVDC evidence to be confirmed.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• CBC an MVDC have agreed that Planning for health provision will require discussions across the two authority areas (MVDC, CBC), involving the Clinical Commissioning Groups (CCGs).</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Discussions to be arranged across the two authority areas (MVDC, CBC), involving the CCGs.</li> </ul>

**Transport Infrastructure:**

Transport links and public transport connections between Mole Valley and Crawley are weak. This limits effective cross-boundary benefits of strategic developments. However, working jointly across the county boundary could allow opportunities for addressing some of the identified unmet infrastructure needs. This could include working jointly with Reigate and Banstead Borough Council as well as both West Sussex and Surrey County Councils, and the National Health Service. Public transport links to Gatwick Airport and East Surrey Hospital are particularly important, and the authorities are also engaging with Metrobus.

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	To develop an agreed position on the transport impacts of strategic allocated sites.
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<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley Local Plan Transport Modelling (under preparation)</li> <li>• Crawley draft Infrastructure Plan (2020)</li> <li>• Crawley New Directions Transport Strategy 2020</li> <li>• Mole Valley Infrastructure Delivery Plan (2020)</li> <li>• Mole Valley District Council Local Plan Strategic Highways Assessment (2019)</li> <li>• Mole Valley Local Plan Site Specific Transport Assessment Modelling – <i>to be undertaken on finalisation of site allocations to be taken forward.</i></li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Mole Valley District Council Local Plan Strategic Highways Assessment (2019) identified three hotspots (areas of stress where drivers are subject to considerable delay and are likely to require mitigation to facilitate any development in the local area) in Hookwood. These include two junctions and A23 Brighton Road.</li> <li>• The Infrastructure Delivery Plan Schedule of Schemes contains a number of cycling schemes involving links between Charlwood and Hookwood in MVDC, Horley (R&amp;B DC) and Gatwick (CBC).</li> <li>• Surrey County Council has submitted a bid for Tranche 2 (the creation of longer-term projects) of the funding allocations for the emergency active travel fund. Scheme 4 – A217 Gatwick to Westvale Park Shared Cycle/footway is located on the A217 Reigate Road between the A217 / Westvale Road roundabout to the A23 roundabout at the approach to Gatwick Airport.</li> <li>• The conclusions of the Crawley Transport Modelling are yet to be finalised. Once known these will be shared and this section will be updated with key issues.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• CBC and MVDC have agreed that where development with strategic transport implications is proposed close to the authorities’ common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive development management and maximise infrastructure benefits.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Where strategic development is proposed close to the authorities’ common administrative boundary, the authorities will work together to establish a joint Planning Policy position to support positive Development Management and maximise infrastructure benefits.</li> </ul>

	<ul style="list-style-type: none"><li>• The authorities agree to jointly explore opportunities through discussions with Surrey and West Sussex County Councils and Reigate and Banstead Borough Council.</li></ul>
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# Statement of Common Ground

Between:

West Sussex County Council; and

Adur District Council;  
Arun District Council;  
Chichester District Council;  
Crawley Borough Council;  
Horsham District Council;  
Mid Sussex District Council;  
South Downs National Park Authority;  
Worthing Borough Council.

April 2020



Version	Date
Version 2 – incorporating comments from consultation with PPOG	December 2019
Version 3 – incorporating comments from consultation with PPOG (Dec 2019 -Jan 2020)	January 2020
Version 4 – Amended final document for signature	April 2020

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## 1.0 Introduction

1.1 Paragraph 24 of the National Planning Policy Framework (NPPF) states that: *"Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."*<sup>1</sup>

1.2 It also states that *"In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency"*.<sup>2</sup>

## 2.0 Purpose

2.1 This Statement of Common Ground (SCG) sets out the process and arrangements for cooperation between West Sussex County Council (WSCC) and the local planning authorities (LPA) in West Sussex in relation to the following statutory and non-statutory functions and services:

- Minerals Planning;
- Waste Planning;
- Waste Disposal;
- Education;
- Transport;
- Flood Risk Management;
- Library Service;
- Public Health Service;
- Adult Services;
- Fire and Rescue Service.

2.2 The parties to this SCG are West Sussex County Council (WSCC) and the following LPAs:

- Adur District Council (ADC);
- Arun District Council (ArDC);
- Chichester District Council (CDC);
- Crawley Borough Council (CBC);
- Horsham District Council (HDC);
- Mid Sussex District Council (MSDC);

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<sup>1</sup> Paragraph 24 of the NPPF (2019).

<sup>2</sup> Paragraph 27 of the NPPF (2019).

- South Downs National Park Authority (SDNPA);
- Worthing Borough Council (WBC).

2.3 This SCG provides evidence of on-going cooperation between WSCC and the **LPAs under the 'Duty to Cooperate'**. It will be reviewed and updated, where necessary, on an annual basis by the West Sussex **Planning Policy Officer's** Group (PPOG), which meets quarterly to discuss cross-boundary and other strategic matters.

2.4 Each LPA will prepare a SCG that addresses strategic matters relevant to the preparation of local plans, neighbourhood plans, and infrastructure delivery plans (IDPs) in their plan areas. As necessary, they will address joint working and cooperation with WSCC in relation to the strategic matters identified in this SCG.

2.5 The SCG will be signed off by the Head of Planning, or equivalent, in each authority according to their own governance arrangements.

### 3.0 Roles and Responsibilities

#### West Sussex County Council

3.1 WSCC is the Minerals Planning Authority (MPA) and Waste Planning Authority (WPA) for the areas outside the South Downs National Park (SDNP) in West Sussex. It is responsible for preparing local plans for minerals and waste and for determining planning applications for such matters.

3.2 As Waste Disposal Authority (WDA) for West Sussex, WSCC has the statutory duty to manage the treatment of waste in an economic, efficient and environmentally sensitive way which means they are responsible for arranging for the disposal of household waste collected across the County.

3.3 As the Local Education Authority (LEA), WSCC has a statutory responsibility to provide education for all children of school age (four to 16 and up to 25 for those with special educational needs and/or disabilities as outlined in the Special Needs and Disabilities SEND code of practice 0-25 2014), and to ensure sufficient nursery education for three and four year olds. Further information is contained in Planning for School Places 2019 which is updated annually (<https://www.westsussex.gov.uk/about-the-council/policies-and-reports/school-policy-and-reports/planning-school-places/>).

3.4 As the Local Transport Authority (LTA) for West Sussex, WSCC is responsible for providing advice on areas such as road safety, accessibility, highway capacity, freight, public transport and opportunities to improve access for pedestrians and cyclists and identify where improvements to the

Public Rights of Way network could take place. This is in order to deliver the objectives of the Local Transport Plan of: promoting economic growth; tackling climate change; promoting access to services; employment and housing and improving safety; security and health. Infrastructure requirements will be based on the **County Council's aims, objectives and strategic priorities** for transport set out in the West Sussex Transport Plan 2011-2026 (WSTP).

- 3.5 As the Lead Local Flood Authority (LLFA) for West Sussex, WSCC is the risk management authority responsible for local flood risk, which is defined as flooding from surface water, groundwater and ordinary water courses.
- 3.6 WSCC has a statutory duty to provide a public library service and there is a need to ensure the community has access to library services when new development is proposed.
- 3.7 In April 2013, WSCC was given responsibility for promoting and protecting **the public's health. This was part of the overall NHS reform programme.** WSCC will work with partners to address all aspects of the health and wellbeing of the local population and they are currently working on a strategy to identify the need for additional infrastructure.
- 3.8 The Care Act 2014 places a duty on WSCC to ensure there is diversity and quality in the market of care providers, so that there are enough high-quality services for people to choose from. The challenge for social care commissioners and housing authorities lies in shaping the provision of housing support and care for older people, in a way that offers choice and ensures the aspirations and needs of an ageing population can be met. WSCC is currently working on a strategy to identify requirements for additional infrastructure for extra care housing.
- 3.9 **The County Council's Fire and Rescue Service is required to identify risks in** the communities of West Sussex, and match resources to those risks. WSCC is currently working on a strategy to identify requirements and need for additional infrastructure.

#### Local Planning Authorities

- 3.10 There are seven district and borough councils responsible for preparing their own local plans, setting out the planning policy framework for development in their area and including strategic and non-strategic policies. The local plan also sets out land allocation, infrastructure requirements, housing needs, and requirements to safeguard the environment. LPAs are also responsible for determining planning applications for development and use of land and buildings, which can range from an extension to a house to a large retail centre.

- 3.11 As well as providing an adequate supply of land for development, local plans should also identify what infrastructure is required, including how and when it can be brought forward. This information is set out in an Infrastructure Delivery Plan (IDP), which provides the evidence for securing contributions from the Community Infrastructure Levy (CIL).
- 3.12 The SDNPA is the planning authority for the SDNP. The SDNPA works jointly with West Sussex, Hampshire, East Sussex and Brighton and Hove on minerals and waste planning in their areas. For all other planning matters, the SDNPA is responsible for preparing their own local plan. The SDNPA and all relevant authorities are required to have regard to the purposes of the SDNP as set out in Section 62 of the Environment Act 1995. The purposes are: *'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area'* and *'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public'*.
- 3.13 LPAs have a statutory responsibility for supporting qualifying bodies in the preparation of neighbourhood plans. Neighbourhood plans provide the opportunity for communities to set out how they want their community to develop. They should support the delivery of strategic policies in the local plan and can consider what infrastructure needs to be provided alongside development. **The County Council's** role is to provide advice on the impact of proposals in a neighbourhood plan on the services it provides. Once adopted, a neighbourhood plan becomes part of the local statutory development plan that forms the basis for determining planning applications in that area.

## 4.0 Spatial Geography

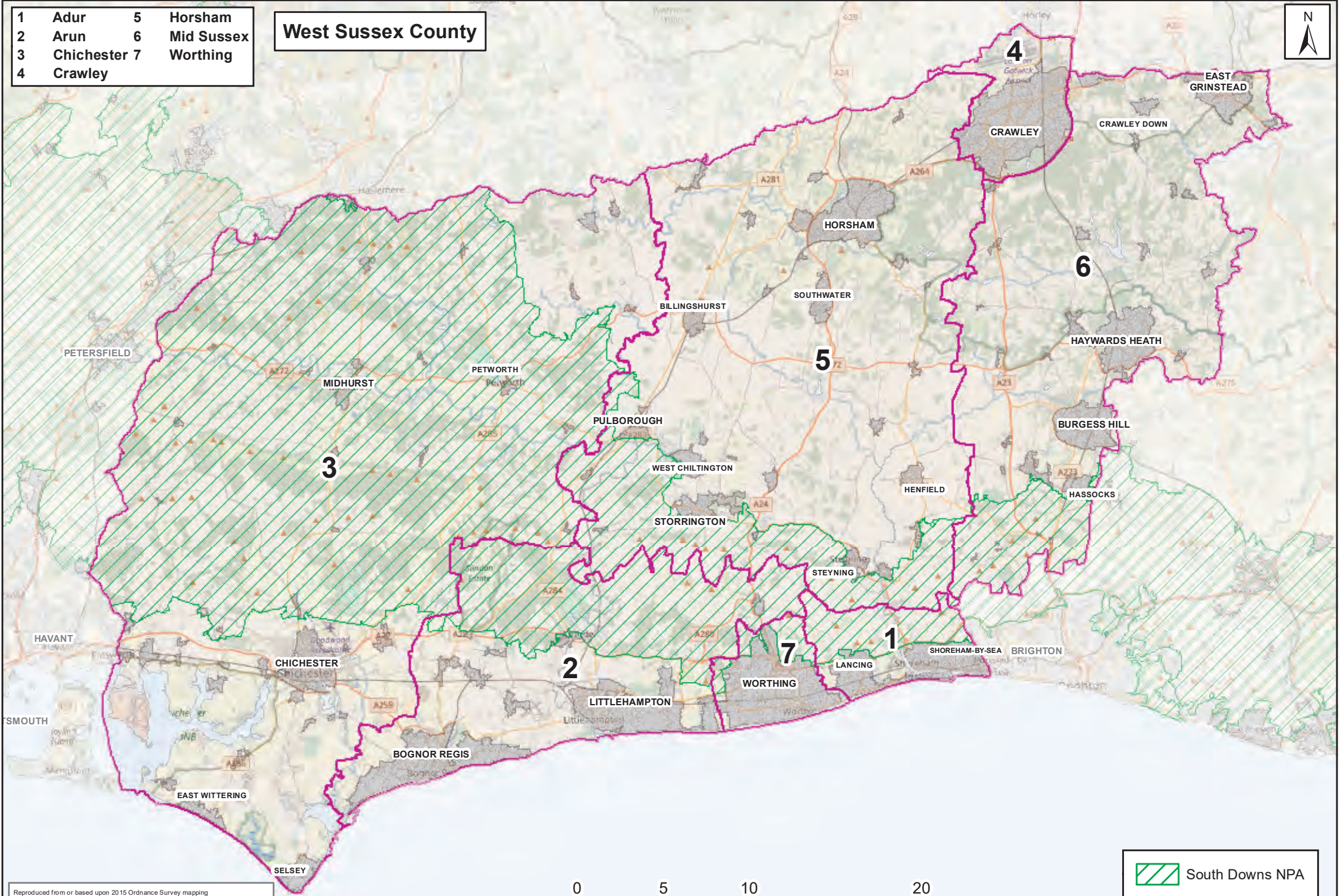
- 4.1 West Sussex is situated in the South East region. It covers 1,990 square kilometres (199,000 hectares) with more than half of the county protected by national landscape designations including SDNP, the High Weald Area of Outstanding Natural Beauty (AONB) and Chichester Harbour AONB. The county is divided into seven district and borough councils and the SDNPA (Figure 1). The main coastal development stretches from Bognor Regis in the west through Littlehampton and Worthing to Shoreham-by-Sea, Southwick and Fishergate to the east. Inland, development in the east is concentrated around Burgess Hill on the county boundary with East Sussex and in the north-east of the county around Horsham, Crawley and East Grinstead. The county has transport links with London, Brighton and Hove

and adjoining authorities (Brighton and Hove City Council, and county and district/borough councils in East Sussex, Hampshire and Surrey).

- 4.2 The strategic road network includes the coastal A27, the A23/M23 route from Brighton to London via Crawley, and the A24 from Worthing to Horsham. The rail network crosses east/west along the developed coastal area and north/south along two lines, the Brighton-London Mainline and the Arun Valley: from Brighton to Three Bridges; and from Arundel to Horsham and Crawley, continuing to London. Shoreham Harbour port is important for imports and exports and its location close to Brighton and Hove and East Sussex results in cross-boundary movement of goods and materials outside of the county. Gatwick Airport in the north of the county, in Crawley Borough, is a major international airport that makes a substantial contribution to the economic performance of West Sussex, the south east and London.


- |   |            |   |            |
|---|------------|---|------------|
| 1 | Adur       | 5 | Horsham    |
| 2 | Arun       | 6 | Mid Sussex |
| 3 | Chichester | 7 | Worthing   |
| 4 | Crawley    |   |            |

# West Sussex County



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 South Downs NPA



## 5.0 Joint Working

### Minerals Planning

- 5.1 The geology of West Sussex is a sequence of broad zones from the south to the north including sand and gravel, brick clay, chalk and building stone. Oil and gas resources are present in West Sussex and are currently exploited on a limited scale.
- 5.2 Sharp sand and gravel is sourced mainly from the sea. Soft sand can only be won from land-won sources which largely lie within the SDNP. Minerals infrastructure plays an important role in the supply of minerals to West Sussex. Minerals that are extracted or imported are usually processed (screening, washing or crushing) at quarries, wharves or rail depots. Wharves in West Sussex are in Littlehampton and Shoreham and there are five rail depots which are situated in Crawley, Chichester and Ardingly.
- 5.3 Mineral Planning Authorities (MPA) **should plan to meet a 'steady and adequate' supply of aggregates** (soft sand, sharp sand and gravel and crushed rock) and the supply and demand for aggregates is set out in the Local Aggregate Assessment (LAA), which is produced annually. MPAs should also plan for industrial minerals (brick making clay, chalk and silica sand in West Sussex).
- 5.4 WSCC and SDNPA jointly prepared the West Sussex Joint Minerals Local Plan 2018 (JMLP), which sets out strategic policies for different types of minerals until 2033 and includes one site allocation for clay extraction. It provides the basis for making decisions about planning applications for minerals.
- 5.5 In accordance with Policy M2 of the JMLP, the WSCC and SDNPA are undertaking a single issue Soft Sand Review (SSR), which will identify the need for soft sand during the period to 2033, the strategy to meet the identified shortfall, and, as necessary, identify sites to meet the need.

### Waste Planning

- 5.6 The West Sussex Waste Local Plan (WLP), prepared in partnership by WSCC and the SDNPA, was adopted in April 2014. The WLP covers the period to 2031. It provides a basis for consistent decisions about planning applications for waste management facilities. The Plan sets out four key areas which were prepared in order to help shape the future of waste management in West Sussex:

- a vision and strategic objectives for sustainable waste management;

- nine policies to achieve the strategic objectives for the management of different waste types (Policies 1-9);
- 13 development management policies to ensure no unacceptable harm to the environment, economy or communities of West Sussex (Policies 11-23);
- six site allocations to help us meet the need for new facilities (Policy 10).

- 5.7 The WLP safeguards existing waste management sites and infrastructure (Policy W2) to ensure that other forms of development do not prevent or prejudice their use or operations, to ensure they continue to make an important contribution to the management of waste arising in West Sussex.
- 5.8 The WLP was subject to a five-year review in 2019, as required by National Policy. The review concluded that the WLP remains relevant, effective, and **'fit for purpose'**. The WLP will be subject to a further five year review in 2024. An early review may be triggered if that is indicated through monitoring.

#### Gatwick Diamond

- 5.9 The Gatwick Diamond, with Gatwick Airport at its centre, includes the Counties of West Sussex and Surrey. Strategic planning across this area is carried out through the joint working and cooperation of the non-statutory Gatwick Diamond Local Planning Authorities groups (officer and member levels): Crawley, Epsom and Ewell, Horsham, Mid Sussex, Mole Valley, Reigate and Banstead District and Borough councils, and Surrey and West Sussex County Councils. This group have produced a signed Memorandum of Understanding, and a Local Strategic Statement (originally prepared in 2012 and updated in 2016). The Gatwick Diamond Initiative, a business-led partnership focusing on key strategic economic issues for the area, is funded and supported by the district and borough councils, two county councils and Gatwick Airport.
- 5.10 WSCC, Crawley Borough Council, Horsham District Council and Mid Sussex District Council are part of the Gatwick Joint Local Authority Members Group and Gatwick Officers Group. These groups have a Memorandum of Understanding and discuss any reports published by Gatwick Airport Limited in relation to the Gatwick Airport Master Plan, Action Plans, and Airport Surface Access Strategy, the submission of major planning applications or consultations, co-ordination of liaison arrangements between Authorities, any remedial measures put forward by Gatwick Airport Limited and other issues relating to the development of the airport of common interest.



Figure 2: The Gatwick Diamond Location  
(Source: Gatwick Diamond Local Strategic Statement).

### West Sussex and Greater Brighton Partnership

- 5.11 The West Sussex and Greater Brighton Partnership include the following local planning authorities: Adur; Arun; Brighton and Hove; Chichester; Crawley, Horsham; Lewes; Mid Sussex; Worthing; WSCC and SDNPA. It looks at the strategic objectives and spatial priorities for delivering these in a sustainable way through a Strategic Planning Board.
- 5.12 Local Strategic Statements (LSS) have been prepared for the West Sussex and Greater Brighton Partnership and these are the main vehicles for taking forward the work of the West Sussex and Greater Brighton Strategic Planning Board. The LSS sets out strategic objectives and spatial priorities **to reflect the partners' clear aspirations for long term sustainable growth** (including addressing unmet housing need). The latest LSS (LSS2) has been updated to take account of changes that have been made in the area covered by the Board (to include Mid Sussex and Horsham Districts) and to take account of local plan progress. Crawley Borough has subsequently joined the Board and ongoing joint work has commenced on the preparation of LSS3 to cover the entire area.



**NORTH**

**West Sussex & Greater Brighton Strategic Planning Board Area**

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Key:



West Sussex & Greater Brighton Strategic Planning Board Area



District Boundaries



South Downs National Park Authority Local Planning Authority



English Channel

Scale = 1:200,000 @ A3



## 6.0 General Matters

- 6.1 The Parties agree that they will continue to work together in a constructive and meaningful way in preparing local plans, neighbourhood plans, and IDPs. This includes the provision of advice on evidence bases and providing comments at informal and formal consultation stages.
- 6.2 The Parties agree to identify, as early as possible, areas of agreement and disagreement, in relation to the preparation of local plans, neighbourhood plans, and IDPs. A template is provided in Appendix A to be completed throughout plan preparation for submission, setting out where an agreement has been reached and where there are any outstanding matters that need to be resolved.
- 6.3 The Parties agree to seek to resolve any disagreements although this agreement shall not fetter the discretion of any party in the exercise of any of its statutory powers and duties.
- 6.4 The Parties agree that WSCC will identify what, where, and when new or improved infrastructure provided by WSCC (on a statutory basis or as a service provider) is needed to mitigate the impact of planned development.
- 6.5 The Parties agree that the LPAs will ensure that local plans make appropriate provision for new or improved infrastructure that is provided by WSCC (on a statutory basis or as a service provider).
- 6.6 The Parties agree that they will take reasonable steps to ensure meetings in relation to the above matters are attended and that, as necessary, cooperation takes place through the following:
- meetings between WSCC and the LPA, with a dedicated WSCC officer liaising with each LPA;
  - regular meetings and information exchange through the **Planning Policy Officer's Group** (comprising Policy Officers from West Sussex and a representative from the Environment Agency) and the **Chief Planning Officer's Group (CPOG)**;
  - strategic planning matters discussed between Chief Executives.

## 7.0 Strategic Matters

### Waste Planning

7.1 The Parties agree to have regard to the national planning policy for waste and help deliver the waste hierarchy. They will work collaboratively to safeguard and provide a suitable network of facilities to deliver sustainable waste management and to minimise areas of conflict between the authorities on matters relating to waste management in accordance with Paragraph 8 of the NPPW (2014) which states that:

*"When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:*

- the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities".*

7.2 In accordance with Policy W2 (Safeguarding Waste Management Sites and Infrastructure) of the WLP, existing and allocated waste management sites should be safeguarded to ensure that the network for managing waste within West Sussex is maintained. The Parties agree that the impact of non-waste development on existing and allocated waste management sites will be considered and the WPA will be consulted during the preparation of local plans and neighbourhood plans for non-waste development that fall within a Waste Consultation Area (WCA). LPAs should also show allocated strategic waste sites on their policies map.

7.3 The Parties agree that the WSCC will provide the LPA with GIS data of the WCAs to ensure there is effective consultation between WSCC and the LPA. A list of safeguarded waste sites is provided in the West Sussex Monitoring Report ([www.westsussex.gov.uk/mwdf](http://www.westsussex.gov.uk/mwdf)) and the WCA will be updated and re-issued to the LPAs as necessary.

7.4 The Parties agree that the development plan for the area, including waste plans, and matters relating to safeguarding of waste infrastructure should be raised at the pre-allocation site assessment stage to ensure that it is taken into consideration at the earliest opportunity. Further guidance on implementing the safeguarding policy in the WLP is in the Minerals and Waste Safeguarding Guidance ([www.westsussex.gov.uk/mwdf](http://www.westsussex.gov.uk/mwdf)).

7.5 The need for additional capacity at wastewater treatment works may arise as a result of development proposed in emerging local plans. Policy W6 of the WLP makes provision for new sites to be permitted to support new development. The Parties agree that they will continue to work together to support the delivery of additional capacity at wastewater treatment works to facilitate the delivery of development in their local plans. The Parties agree that proposals for non-waste development that may affect wastewater treatment facilities should be referred directly to the relevant water authority in accordance with their consultation protocol.

### Minerals Planning

7.6 The Parties agree that they will work together to ensure that mineral resources and infrastructure are safeguarded in accordance with Policies M9 (Safeguarding Minerals) and M10 (Safeguarding Minerals Infrastructure) of the JMLP and Paragraph 5 of the Planning Practice Guidance which states that:

*"Whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in 3 ways:*

- *having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps;*
- *in those areas where a mineral planning authority has defined a [Minerals Consultation Area](#), consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and*
- *when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction".<sup>3</sup>*

7.7 The Parties agree to have regard to the JMLP when identifying sites for non-mineral development and to refer to the West Sussex Minerals and Waste Safeguarding Guidance, which supports the policies in the JMLP.

7.8 The Parties agree to show Mineral Safeguarding Areas (MSA) and allocated strategic mineral resource and infrastructure sites (as set out in Appendices C, D and E of the JMLP) on their policy maps and to make reference to safeguarded minerals resources and infrastructure in their local plans where there are policy implications.

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<sup>3</sup> Paragraph 5 of the Planning Practice Guidance.

- 7.9 The Parties agree that WSCC will provide the LPAs with GIS data of the MSA, Minerals Consultation Areas (MCA), and safeguarded/allocated sites. The MSA and allocated/safeguarded infrastructure (listed in Policy M10 of the JMLP) will be shown on the policy maps. The Parties agree that the impact of non-mineral development within the MCA<sup>4</sup> will be considered and WSCC will be consulted during the preparation of local plans and neighbourhood plans for non-mineral development that fall within a MCA<sup>5</sup>. The LPA should take account of the views of WSCC.
- 7.10 The Parties agree that safeguarding mineral resources and infrastructure should be raised at pre-allocation stage to ensure that it is taken into consideration at the earliest opportunity.
- 7.11 The Parties agree that proposals for non-mineral development that fall within the MCA should be accompanied by the appropriate information as set out in the latest Minerals and Waste Safeguarding Guidance to assist in the consideration of the policy implications.

#### Waste Disposal

- 7.12 The Parties agree that WSCC will provide information on the required need for investment into future waste disposal infrastructure, which may include contributions towards waste handling and transfer of waste disposal infrastructure (such as transfer stations).

#### Education

- 7.13 The Parties agree that WSCC will provide consultation responses on, and support the delivery of, school places for primary, secondary and sixth **form, early year's** and provision for those with Special Education Needs and Disabilities (SEND) in the preparation of local plans, neighbourhood plans, and IDPs.

#### Transport

- 7.14 The Parties agree that the WSCC will provide advice and support during the preparation of local plans (including providing input into evidence base to assess the impact of future growth and to identify mitigation measures), neighbourhood plans and IDPs.

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<sup>4</sup> The Mineral Consultation Areas (MCAs) are based on the Mineral Safeguarding Areas (MSAs).

<sup>5</sup> For consultation criteria, please refer to the Minerals and Waste Safeguarding Guidance ([www.westsussex.gov.uk/mwdf](http://www.westsussex.gov.uk/mwdf)).



## Flood Risk Management

- 7.15 The Parties agree that the WSCC will provide the LPA with consultation responses on the surface water drainage provisions associated with the preparation of local plans, neighbourhood plans, strategic flood risk assessments, and other planning documents produced by LPA. The Parties agree to take account of **the 'West Sussex LLFA Policy for the Management of Surface Water, 2018'**([https://www.westsussex.gov.uk/media/12230/ws\\_llfa\\_policy\\_for\\_management\\_of\\_surface\\_water.pdf](https://www.westsussex.gov.uk/media/12230/ws_llfa_policy_for_management_of_surface_water.pdf)) when preparing local plans.

## Libraries

- 7.16 The Parties agree that WSCC will provide information on, and support the delivery of, the provision of library facilities during the preparation of local plans, neighbourhood plans, and IDPs.

## Public Health

- 7.17 The Parties agree that they will work with LPAs to identify policy approaches to support public health in local plans, local plans, neighbourhood plans, and IDPs.

## Adults Services

- 7.18 The Parties agree that they will work together to ensure that appropriate provision is made, where relevant, for older people through policies and site allocations in local plans, neighbourhood plans, and IDPs.

## Fire and Rescue Service

- 7.19 The Parties agree that they will work together on infrastructure delivery to support the implementation of local plans, neighbourhood plans, and IDPs.

## 8.0. Signatories

West Sussex County Council (WSSCC)

*Michael Elkington, Head of Planning Services*



and

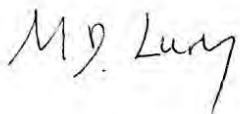
Adur District Council (ADC)

*James Appleton, Head of Planning and Development, Adur and Worthing Councils*



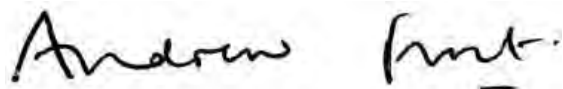
Arun District Council (ArDC)

CLlr Martin Lury (Cabinet Member for Planning, Arun District Council).



Chichester District Council (CDC)

*Andrew Frost, Director Planning and Environment*



Crawley Borough Council (CBC)

*Clem Smith, Head of Economy and Planning*



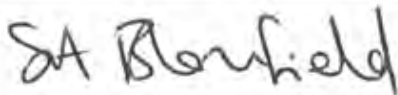
Horsham District Council (HDC)

*Catherine Howe, Head of Strategic Planning*



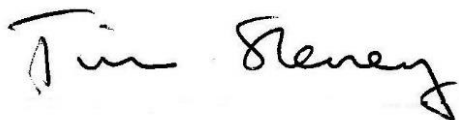
Mid Sussex District Council (MSDC)

*Sally Blomfield, Divisional Leader Planning and Economy*



South Downs National Park Authority (SDNPA)

*Tim Slaney, Director of Planning*



Worthing Borough Council (WBC)

*James Appleton, Head of Planning and Development, Adur and Worthing Councils*



Appendix A

Statement of Common Ground Template

[Name of Plan]

## Statement of Common Ground

[Signatory authorities]

[Date]

Version	Plan making stage	Date

## Introduction

### Purpose

*[Summary of what the SCG is about including Governance arrangements]*

### Roles and Responsibilities

*[Authorities involved]*

### Spatial Geography

*[Geographical area covered by the SCG including a map]*

### Joint Working

*[Discussion about areas of joint working]*

### Strategic Matters and General Matters

*Set out each matter; evidence of activities undertaken to address them; if any agreement has been reached/not reached; what is being done to address it matters that have not been agreed; links to evidence. Matters may include the following:*

- *Proposed development requirements and distribution as set out in the Local Plan;*
- *Infrastructure requirements as set out by WSCC;*
- *Matters relating to mineral and waste, including safeguarded areas, safeguarded infrastructure and site allocations.*

### Signatories

*[List signatories involved]*

Timetable for agreement, review and update

Current Plan stage	Target Reg. 18 date	Target Reg. 19 date	Target Submission date	Proposed Plan review date



Statement of Common Ground

as agreed between

Tandridge District Council and Crawley  
Borough Council

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**1. Introduction**

*The basis for preparing this Statement of Common Ground*

**2. Key Matters**

*Housing*

*Travellers*

*Infrastructure*

**3. Actions going forward**

**4. Signatories**

**Appendix A: Administrative Areas**

## 1. Introduction

### The basis for preparing this Statement of Common Ground

- 1.1 This Statement of Common Ground (SCG) has been prepared by Tandridge District Council (TDC) together with Crawley Borough Council (CBC). It reflects the agreed position between the parties.
- 1.2 The purpose of this SCG is to set out the basis on which TDC and CBC have actively and positively agreed to work together to meet the requirements of the Duty to Cooperate. TDC have prepared their Local Plan for Regulation 19 consultation during the summer of 2018. This statement also describes the established mechanisms for ongoing cooperation on strategic matters.
- 1.3 Under section 33A of the Planning and Compulsory Purchase Act 2004 (amended by section 110 of the Localism Act 2011), and in accordance with the National Planning Policy Framework (NPPF) 2012, it is a requirement under the Duty to Cooperate for local planning authorities, county councils and other named bodies to engage constructively, actively and on an on-going basis in the preparation of development plan documents and other local development documents. This is a test that local authorities need to satisfy at the Local Plan examination stage, and is an additional requirement to the test of soundness.
- 1.4 The Duty to Cooperate applies to strategic planning issues of cross boundary significance. Local authorities all have common strategic issues and as set out in the National Planning Practice Guidance (NPPG) "*local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.*" The statutory requirements of the Duty to Cooperate are not a choice but a legal obligation. Whilst the obligation is not a duty to agree, cooperation should produce effective and deliverable policies on strategic cross boundary matters in accordance with the government policy in the NPPF, and practice guidance in the NPPG.
- 1.5 The administrative areas set out in Appendix A show that TDC and CBC share a common boundary and hence are required to work cooperatively in an effective way to address key strategic matters pertaining to these areas.

## 2. Key Matters

### 2.1 Housing

- 2.1.1 Government policy places much emphasis on housing delivery as a means for ensuring economic growth and addressing the current national shortage of housing. Paragraph 47 of NPPF is very clear that '*local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this framework...*'.

- 2.1.2 The evidence undertaken through both authorities' Strategic Housing Market Assessments (SHMAs) identifies that, whilst the two authorities share a geographical boundary, they fall within different Housing Market Areas (HMAs). Crawley is part of the Northern West Sussex HMA with Mid Sussex and Horsham, whilst Tandridge does not form part of a distinctive HMA. Tandridge overlaps with part of the Northern West Sussex HMA and both authorities have a relationship with Reigate and Banstead. However, the relationships vary to a considerable degree.
- 2.1.3 TDC prepared a HMA Paper<sup>1</sup> as part of their SHMA in 2015 and updated this in 2018. The HMA papers set out that *"...evidence points towards Tandridge being a functional component of a HMA including Croydon, Reigate and Banstead and Mid Sussex."*
- 2.1.4 TDC's SHMA identifies that Crawley forms part of the wider Northern West Sussex housing market area, which extends to include Horsham and Mid Sussex, and to a lesser extent Reigate and Banstead (particularly in relation to Horley). Several housing evidence base studies have been jointly commissioned across this geography, most recently in 2014.
- 2.1.5 TDC's 2015 SHMA has identified an objectively assessed housing (OAN) need for the district of 470 houses per annum which amounts to 9,400 dwellings over 20 years. Following the publication of the 2018 household projections, TDC updated their OAN paper in line with the NPPF 2012<sup>2</sup>, which includes the uplift of the projections based on market signals. The 2018 paper identified an OAN of 398 dwellings per annum.
- 2.1.6 TDC's Housing Land Supply Paper 2018 sets out when considering all the evidence, including the constraints within the District, a total of 6,150 dwellings over 20 years is the maximum capacity achievable in the District. This includes a buffer of 5%. This will lead to an unmet housing need of approximately 1,904 dwellings in Tandridge based against the OAN 2018. In seeking to meet their unmet housing need, TDC has engaged with neighbouring councils within their HMA to explore the possibility of them assisting TDC to meet this need.
- 2.1.7 Paragraph 179 states *"Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework"*.
- 2.1.8 CBC's adopted Local Plan acknowledges an unmet need for approximately 5,000 homes over its plan period (2015 – 2030) and confirms the Council's intention to work closely with its neighbours – particularly those in Northern West Sussex – to explore how this need can be met in sustainable locations. Contributions to meet this unmet need in full has been provided via the Horsham District Plan and the Mid Sussex District Plan. However, the combined three adopted Plan housing target figures fall short of the total unmet need identified to be arising from Crawley, by a total of approximately 300 dwellings. This is anticipated only to occur towards the end of the Plan period, by 2030. The Mid Sussex District Plan commits to monitoring housing delivery against this need and will look to

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<sup>1</sup><https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Evidence%20base%20and%20technical%20studies/SHMA-2018-Defining-Housing-Market-Area.pdf>

<sup>2</sup> TDC are aiming to submit their Local Plan by January 2019, which is within the 6 month transitional window where existing plans are to be examined against the NPPF 2012.

include it in its review of the Mid Sussex District Plan. On this basis, the Northern West Sussex Housing Market Area is able to meet its own objectively assessed housing needs. The constrained land supply and high housing need, which strongly characterise and influence planning within Crawley borough, demonstrate that CBC is unable to help TDC meet their unmet need. However, both councils will continue to work together through a governance arrangement to be agreed within the next two years so that joint strategic plans can be prepared to consider where unmet need could be met.

## Actions

- TDC and CBC will engage through a wider Duty to cooperate forum with other neighbouring authorities outside TDC HMA in relation to housing related matters, including unmet need, five year housing trajectory, best fit HMAs, affordability, large scale developments and opportunities for meeting unmet need.
- TDC to undertake a 5 year review of the Local Plan.

## 2.2 Travellers

- 2.2.1 In 2011, the Gatwick Diamond authorities (which include Crawley, Mid Sussex, Horsham, Tandridge, Reigate & Banstead and Mole Valley) agreed to seek to meet their own need for additional Traveller provision. As part of the Gatwick Diamond Authorities, the authorities meet up four times a year to discuss Traveller issues and share information
- 2.2.2 In March 2014, TDC issued a “call for sites” to establish land in the District that may be suitable for traveller accommodation, but there was a limited response. TDC also reviewed existing unauthorised sites and temporary permissions. However, through a robust assessment of the sites, insufficient sites have been identified to meet the need of 5 traveller sites and 21 travelling showpeople plots.
- 2.2.3 There are currently some planning applications submitted to TDC that could assist in meeting the 5 traveller sites; these applications are to be determined by the end of the year. However, there are no suitable sites in the first 10 years, until the Garden Community comes forward for travelling showpeople.
- 2.2.4 There has been a need to cooperate with neighbouring authorities to assist in meet TDC unmet need.
- 2.2.5 As with bricks and mortar housing, Crawley’s constrained land supply and unacceptable noise levels for residential, and particularly caravan, accommodation associated with Gatwick Airport 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’s gypsy and traveller need is currently being safeguarded to meet the future needs arising from the existing population within Crawley. This means that CBC is unable to assist TDC with their unmet need. Both Councils will continue existing joint working arrangements to ensure that suitable provision can be made as appropriate.

**Actions:**

- TDC and CBC engage through the wider Duty to cooperate forum with other neighbouring authorities outside TDC HMA in relation to housing related matters, including traveller provision.
- TDC to undertake a 5 year review of the Local Plan.

**2.3 Infrastructure**

**Gatwick / Junction 9 M23**

2.3.1 CBC and TDC are part of the Gatwick Officers Group and Gatwick Joint Authorities and GATCOM, which are all forums / boards where issues relating to Gatwick are discussed. There is a signed memorandum of understanding with the joint authorities to reflect the day to day monitoring of Gatwick Action Plan.

2.3.2 Gatwick have recently announced their plans for a new masterplan, where the growth anticipated will rise from 46 million passengers to 70 million passengers, and still seeks to continue safeguarding for 95mppa in future. The joint authorities are liaising on this particular subject to discuss matters of mutual interest and sharing of proposed responses. Any impacts this has on Junction 9 of the M23 will continue to be discuss with the Gatwick Diamond Authorities and Highways England as an ongoing matter.

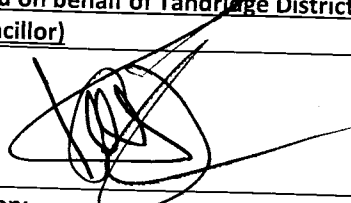

**Action:**



- TDC and CBC engage through the Gatwick Joint Authorities and Gatwick Officers Group to prepare their responses to the 2019 Airport masterplan.

**3. Actions going forward**

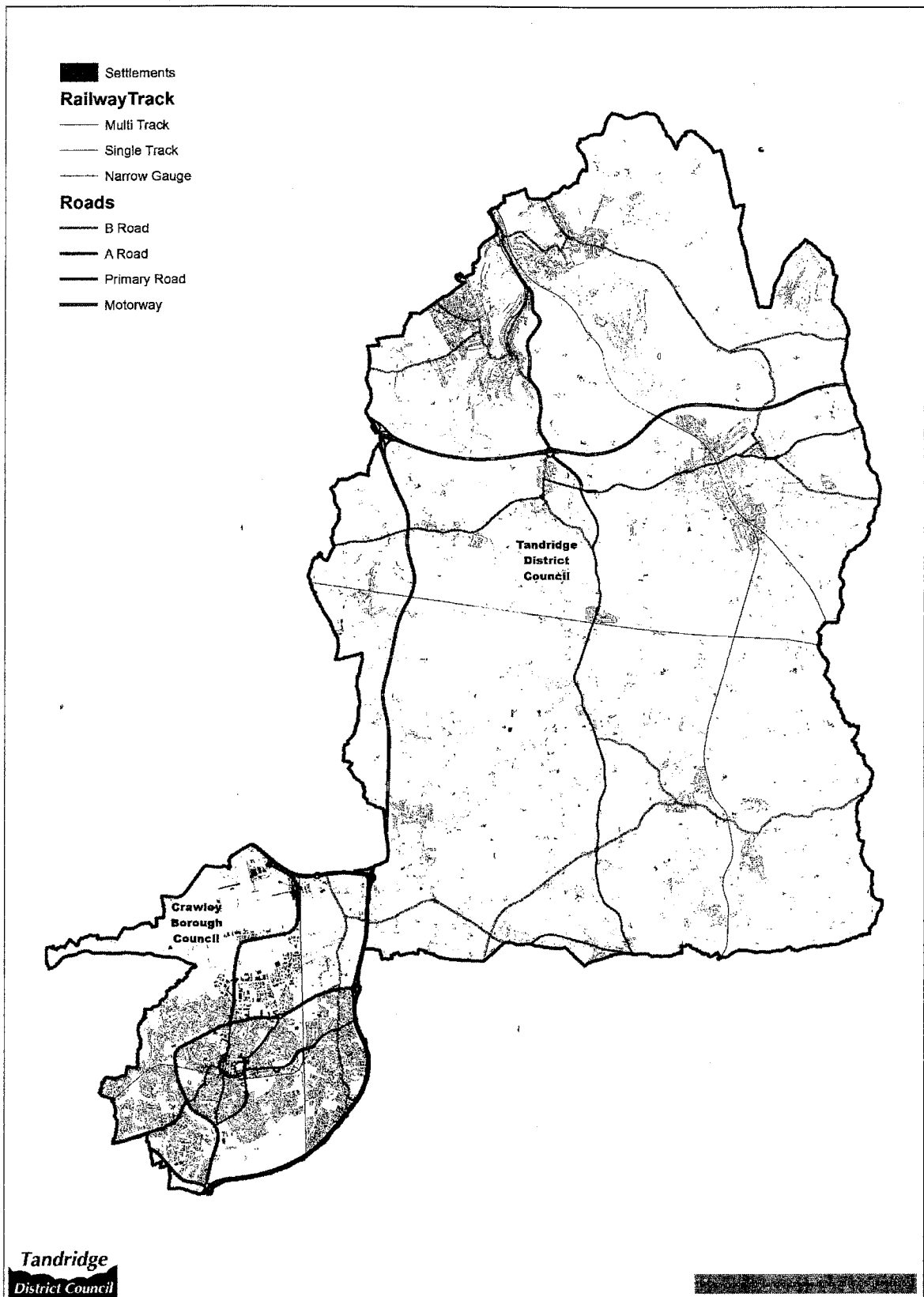
Key Issue	Agreed Action	Other comments
Housing / Gypsy and Traveller	TDC and CBC will engage through the wider Duty to Cooperate forum on all housing related matters to identify where unmet need will be met, as part of the authorities' respective Local Plan Reviews.	
Gatwick	TDC and CBC to liaise on proposed responses to the 2019 Airport masterplan and continue to discuss any impacts on Junction 9 of the M23.	

4. Signatories/Declaration

<b>Signed on behalf of Tandridge District Council (Councillor)</b>	<b>Signed on behalf of Tandridge District Council (Chief Executive)</b>
	
<b>Position:</b>	<b>Position:</b> CHIEF EXECUTIVE
<b>Date:</b>	<b>Date:</b> 11/12/18

<b>Signed on behalf of Crawley Borough Council (Councillor)</b>	<b>Signed on behalf of Crawley Borough Council (Officer)</b>
	
<b>Cllr. Peter Smith</b>	<b>Clem Smith</b>
<b>Position:</b> Portfolio Holder for Planning and Economic Development	<b>Position:</b> Head of Economy and Planning
<b>Date:</b> 10/12/2018	<b>Date:</b> 10/12/2018

Appendix A: Administrative Areas





# Ashdown Forest Statement of Common Ground

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Prepared by The South Downs National Park Authority, Chair of the  
Ashdown Forest Working Group

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**Appendix 1: Ashdown Forest SAC Reasons for Designation**

**Appendix 2: Location map of Ashdown Forest (to be provided)**

**Appendix 3: Meeting notes from the Ashdown Forest Working Group meetings May 2017 – January 2018**

**Appendix 4: Housing numbers table**

**Appendix 5: Traffic modelling table**

**Appendix 6: Air quality calculations table**

## I. Introduction

### The basis for preparing this Statement of Common Ground

- I.1 This Statement of Common Ground (SCG) has been prepared by the South Downs National Park Authority (SDNPA) and is signed by the following members of the Ashdown Forest Working Group (AFWG):<sup>1</sup> the SDNPA, Lewes District Council, Eastbourne Borough Council, Tunbridge Wells Borough Council, Mid Sussex District Council, Tandridge District Council, Crawley Borough Council, Sevenoaks District Council, Rother District Council, East Sussex County Council (as the relevant Minerals and Waste Planning Authority), West Sussex County Council and Natural England. It should be noted that Wealden District Council (WDC) is a member of the AFWG and were involved in the drafting of this document; WDC did not sign the SCG. The signatories of this SCG have been self-selected and come from the AFWG. Further details of this group are set out below. The preparation of the SCG has been facilitated by the Planning Advisory Service (PAS).
- I.2 The purpose of this SCG is to address the strategic cross boundary issue of air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) arising from traffic associated with new development. It provides evidence on how the authorities have approached the Duty to Co-operate, clearly setting out the matters of agreement and disagreement between members of the AFWG.
- I.3 The first section of the SCG introduces the document and explains the background to this cross boundary strategic issue. The second section sets out six key matters on HRA methodology for plan-making with which authorities either agree or disagree with or have no position on. Finally, actions going forward and summary conclusions are given.
- I.4 The SCG highlights a number of different approaches towards undertaking HRA work. It identifies that participating local planning authorities (LPAs) consider they have taken a robust and proportionate approach to the evidence base in plan making, producing in combination assessments which they consider to have been undertaken soundly. Natural England notes that some of the approaches differ and consider that it is up to individual LPAs to determine the specific approach they use. Natural England advise that approaches proportionate to the risk are acceptable and it is not necessary for all LPAs to use exactly the same approach.
- I.5 The different LPAs have used different consultants to undertake their Habitats Regulations Assessments (HRAs). AECOM are the HRA consultants for the SDNPA, Lewes District Council, Tunbridge Wells Borough Council, Tandridge District Council, East Sussex County Council and Sevenoaks District Council. Urban Edge Environmental Consulting, Amey and Arup are the HRA consultants for Mid-Sussex District Council. Crawley Borough Council, Eastbourne Borough Council and Rother District Council have not currently engaged HRA consultants as they have up to date adopted Local Plans.
- I.6 Ashdown Forest is also designated as a Special Protection Area (SPA). It should be noted that this Statement addresses the potential impact pathway of air quality on the Ashdown Forest SAC only and does not discuss matters of recreational pressure on the Ashdown Forest SPA.

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<sup>1</sup> Tonbridge and Malling Borough Council are members of the Working Group but are not a signatory of this Statement on the basis of advice from Natural England. T&MBC continue to be part of the group to observe.

This is addressed through the working group of affected authorities that have assisted in the production of the Strategic Access Management and Monitoring Strategy.

## **Background to the issue**

### **Ashdown Forest SAC**

- 1.6 Ashdown Forest is a Natura 2000 site and is also known as a European site. It is a Special Area of Conservation (SAC) designated for its heathland habitat (and a population of great crested newt). Further details regarding the reason for its designation are set out in Appendix 1. Ashdown Forest SAC is located in Wealden District, East Sussex as shown on the map in Appendix 2.

### **Habitats Regulations Assessment**

- 1.7 The Conservation of Habitats and Species Regulations 2017 (known as the Habitats Regulations) require an appropriate assessment of the implications for the site in view of that site's conservation objectives to be carried out for any plan or project where there are likely to be significant effects on a European site, alone or in combination with other plans or projects. The Ashdown Forest SAC features are vulnerable to atmospheric pollution from a number of sources including motor vehicles. There is a potential impact pathway from new development and associated increases in traffic flows on the roads such as the A275, A22 and A26, which traverse or run adjacent to the SAC. The emissions from these vehicles may cause a harmful increase in atmospheric pollutants which may adversely affect the integrity of the European site.

### **High Court Judgement**

- 1.8 In March 2017 a legal challenge from Wealden District Council (WDC) was upheld by the High Court on the Lewes District and South Downs National Park Authority Joint Core Strategy (Lewes JCS)<sup>2</sup> on the grounds that the HRA was flawed because the assessment of air quality impact on the Ashdown Forest SAC was not undertaken 'in combination' with the increase in vehicle flows likely to arise from the adopted Wealden Core Strategy. This resulted in the quashing of Policies SP1 and SP2 of the Lewes JCS, insofar as they apply to the administrative area of the South Downs National Park, at the High Court on 20 March 2017.

### **Wealden DC Responses to other LPAs Plan Making and Decision Taking**

- 1.9 It should be noted that the representation from WDC on the Pre-Submission version of the South Downs Local Plan and to the draft Lewes Local Plan Part 2 objects to their HRAs. Objections have also been made by WDC to the Main Modifications consultation on the Mid Sussex Local Plan. The South Downs National Park Authority, Lewes District Council and Mid Sussex District Council do not accept the objections made by Wealden District Council on the HRA work undertaken for their Local Plans and consider that the assessments undertaken are robust, reasonable and sound.
- 1.10 Since work started on this Statement of Common Ground, WDC have objected to planning applications in Tunbridge Wells Borough, Rother District, Lewes District, Mid Sussex District, Tandridge District, Horsham District, Sevenoaks District, Hastings Borough and Brighton & Hove City. The objections all centre on the issue of nitrogen deposition on Ashdown Forest.

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<sup>2</sup> Wealden District Council vs Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority, and Natural England. [2017] EWHC 351 (Admin) <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>

This Statement of Common Ground is about plan-making rather than the determination of planning applications and so does not address these letters of objection.

## **Ashdown Forest Working Group**

- 1.11 Following the High Court judgement, the SDNPA led on convening and now chairs the AFWG, which first met in May 2017. The group's members are listed in paragraph 1.1 of this SCG. This HRA matter has arisen for these authorities through their Local Plan work, through WDC objections to planning applications, or due to proximity to strategic roads traversing Ashdown Forest. As set out in legislation, Natural England is a statutory consultee on HRA and is providing advice on the outputs from the air quality modelling. The county councils, as well as the independent consultants mentioned in paragraph 1.5 provide advice in regard to transport evidence that has and is being undertaken to inform Local Plans.
- 1.12 The shared objective of the working group is to ensure that the impacts of development proposals in emerging local plans on Ashdown Forest are properly assessed through HRA and that, if required, a joint action plan is put in place should such a need arise. The Working Group has agreed to work collaboratively on the issues, to share information and existing work, and to prepare this Statement of Common Ground. The notes of the meetings are set out in Appendix 3.

## **2. Key matters**

### **Proportionality**

- 2.1 There is no universal standard on proportionality and the issue relates to what is the 'appropriate' level of assessment required for Local Plans. Paragraph 182 of the National Planning Policy Framework (NPPF) states that for a local plan to be considered sound it needs to be justified and based on proportionate evidence. The draft CLG guidance<sup>3</sup> makes it clear that when implementing HRA of land-use plans, the appropriate assessment should be undertaken at a level of detail that is appropriate and proportional:

*'The comprehensiveness of the assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources than is useful for its purpose.'*

- 2.2 The AFWG has discussed the issue of proportionality and the following principles were put forward:
- Where effects are demonstrably small the level of assessment can be justifiably less complex than a bespoke model.
  - Use of the industry standard air quality impact assessment methodology<sup>4</sup> can, if carried out robustly, provide the necessary evidence to inform HRA on the potential effects of a development plan on the Natura 2000 network and Ramsar sites.

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<sup>3</sup> CLG (2006) Planning for the Protection of European Sites, Consultation Paper

<sup>4</sup> The principles in Annex F of the Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07) for the assessment of impacts on sensitive designated ecosystems due to highways works, which Highways England use for all their HRAs, but with the DMRB spreadsheet tool replaced by an appropriate dispersion model e.g. ADMS-Roads and, with appropriate allowance for rates of future improvement in air quality.

- Members of the working group are entitled, but not required, to carry out non-standard or bespoke assessments; and other members may have regard to the results of those non-standard or bespoke assessments when conducting their own HRAs.

**Table 1: Signatory position regarding proportionality of assessments**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority			
Tunbridge Wells Borough Council			
Sevenoaks District Council			
Lewes District Council			
Eastbourne Borough Council			
East Sussex County Council			
Natural England			
Crawley Borough Council			
Tandridge District Council			
West Sussex County Council			
Mid Sussex District Council			
Rother District Council			

2.3 The named authorities agree with this approach for the following reasons. The approach outlined above sets out parameters for a robust and sound HRA, which is proportionate to the nature of the proposals and likely impacts. Where the spatial extent of the affected area is small then the risk to the integrity of the site needs to be approached in a reasonable and proportionate manner as concluded in the Natural England Research Report (NECR205)<sup>5</sup> on small scale effects i.e. for much of the ‘affected habitat’ SAC features are not present and therefore can be excluded from consideration. With the remaining ‘affected area’ a proportionate approach to how this area contributes to the overall site integrity should be adopted.

### Local Plan Housing Numbers

2.4 The quantum of development expected in each Local Planning Authority (LPA) area is an important matter as it is a key input into any traffic model. The AFWG has discussed this matter and the following approach is proposed as a general principle for the purpose of making forecasting assumptions relating to neighbouring planning authorities for in combination assessment of plan going forward:

<sup>5</sup> CHAPMAN, C. & TYLDESLEY, D. 2016. Small-scale effects: How the scale of effects has been considered in respect of plans and projects affecting European sites - a review of authoritative decisions. Natural England Commissioned Reports, Number 205.

- Where a Local Plan is less than 5 years old, the adopted Local Plan figures should be used, unless the LPA advise in writing that, due to a change in circumstance, an alternative figure should be used or
- Where an emerging Local Plan is at or beyond the pre-submission consultation stage and the LPA undertaking the modelling can be confident of the figures proposed, then the emerging Local Plan figure should be used, or
- For Local Plans that are over 5 years old and considered out of date, and the emerging Local Plan has not progressed, then the OAN/Government Standard Methodology (once confirmed by CLG) should be used, unless otherwise evidenced.

**Table 2: Signatory position on statements above on the approach to identifying appropriate local plan housing numbers to include in modelling for the purposes of forecasting assumptions for HRA air quality modelling.**

Agree	Disagree	No position	Reserve judgement
South Downs National Park Authority		Natural England	
Lewes District Council		Tandridge District Council	
Tunbridge Wells Borough Council		East Sussex County Council	
Sevenoaks District Council		West Sussex County Council	
Eastbourne Borough Council			
Crawley Borough Council			
Mid Sussex District Council			
Rother District Council			

- 2.5 The named authorities agree with this approach for the following reasons: The approach outlined above provides a reasonable and practical way forward to ensure that housing numbers used in future modelling work are selected in a consistent and transparent way and are most robust to inform HRA work.
- 2.6 These named authorities have no position in regards to this approach for the following reasons:
- Tandridge District Council: will apply this approach for consistency and the Duty to Cooperate.
  - West Sussex County Council: WSCC is not an LPA for housing.
  - East Sussex County Council: ESCC is not an LPA for housing.
- 2.7 Based on the above principle set out in paragraph 2.5, Appendix 4 of the Statement sets out agreed housing numbers at the time of drafting this Statement (December 2017). It is recognised that housing numbers would change often due to the number of authorities that

are signatories to this Statement, and therefore these numbers represent a snapshot in time. In light of this, a further three principles are put forward:

- It is expected that each LPA will confirm housing numbers with individual authorities before running models;
- Housing numbers will be a standing item on the agenda for the Working Group going forward. AFWG members shall notify the working group immediately if events take place (relevant to paragraph 2.5) which require an amendment to Appendix 4. In the absence of any objection within 14 days of notification, Working Group members may use the amended figures pending formal sign-off of the changes to Appendix 4 at the next Working Group meeting.
- The agreement of specific housing numbers as set out in Appendix 4, as updated from time to time is applicable to future modelling runs and does not involve retrospectively re-running models. The focus of future modelling is agreed to be to assess the (in combination) impacts of forthcoming Local Plans, not to retrospectively reassess existing adopted Local Plans.

**Table 3: Signatory position on the statements above regarding housing numbers and air quality modelling.**

Agree	Disagree	No position	Reserve judgement
South Downs National Park Authority		Natural England	
Lewes District Council		East Sussex County Council	
Sevenoaks District Council		West Sussex County Council	
Tandridge District Council			
Eastbourne Borough Council			
Crawley Borough Council			
Tunbridge Wells Borough Council			
Mid Sussex District Council			
Rother District Council			

2.8 The named authorities agree with this approach for the following reasons. The approach outlined above provides a reasonable and practical way forward for LPAs to work together in sharing the latest information on housing numbers to inform future modelling work.

2.9 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council: WSCC is not an LPA for housing.
- East Sussex County Council: ESCC is not an LPA for housing.



## Traffic Modelling

- 2.10 The key elements of the various traffic modelling approaches are set out in Appendix 5 of this Statement. Appendix 5 includes analysis of the major differences<sup>6</sup>, minor differences and commonalities in traffic modelling undertaken. The AFWG has discussed these approaches for the purpose of future in combination assessments and agree/disagree with the following:

### Geographical Coverage

- 2.11 This SCG does not set out specific geographical coverage for traffic modelling work. It is a matter for each LPA to determine if modelling is necessary having regard to other sources of traffic flow information, and, to the extent that modelling is considered necessary, the geographic coverage should be sufficiently extensive to enable reasonable and proportionate modelling of flows on Ashdown Forest roads.

**Table 4: Signatory position on geographical coverage of their traffic modelling**

Agree	Disagree	No position	Reserve judgement
South Downs National Park Authority			
Lewes District Council			
Tunbridge Wells Borough Council			
Tandridge District Council			
Mid Sussex District Council			
Sevenoaks District Council			
Eastbourne Borough Council			
Rother District Council			

- 2.12 The named authorities agree with this approach for the following reasons. The nature of the issue is such that it is not appropriate for a set geographical boundary to be drawn. The above approach outlines a practical, proportionate and robust way forward in combination with the other parameters agreed in the subsections below.

### Road Network in Ashdown Forest

- 2.13 The following roads through or adjacent to Ashdown Forest are modelled: A22 (Royal Ashdown Forest Golf Course), A22 (Wych Cross), A22 (Nutley), A275 (Wych Cross) and A26 (Poundgate). For peripheral authorities (i.e. those that do not host the SAC) it is considered that impacts would manifest on main (A) roads in the first instance and in usual circumstances. Therefore, it is logical and reasonable to begin by modelling the roads where

<sup>6</sup> The words 'major' and 'minor' are given their common usage, and are not to be restricted to the definition of major development in the Town and County Planning (Development Management Procedure) (England) Order 2015, or to proposals that raise issues of national significance

the impact will be highest and if, when modelling A roads, a conclusions of no likely significant effects is identified then it is not considered necessary to go on to model B and minor roads.

**Table 5: Signatory position on which roads through or adjacent to Ashdown Forest are modelled**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	Mid Sussex District Council
Lewes District Council		Natural England	
Tunbridge Wells Borough Council			
Tandridge District Council			
Eastbourne Borough Council			
Crawley Borough Council			
Sevenoaks District Council			
West Sussex County Council			

2.14 These named authorities agree with this statement for the following reasons: The above approach sets out a reasonable and logical approach for determining likely significant effects in such a way that is robust and also proportionate. Beginning by modelling the more strategic busiest routes, where impacts will be highest, is an appropriate way to identify likely significant effects. These routes have the greatest current and future flows and are also routes likely to experience greatest change in growth, especially those most likely to be used by residents of authorities some distance from the SAC.

2.15 Mid Sussex District Council reserves judgement in regards the approach set out above for the following reasons: Mid Sussex agrees with this practical approach, but has found that in its case it has been appropriate to consider traffic changes on forest roads, which link to mid Sussex District, including the B1110.

**Data types for base year validation**

2.16 The data type for the modelling base year is the 24hr Annual Average Daily Traffic (AADT) and uses base flow data provided by WDC for 2014.

**Table 6: Signatory position on the data types for base year validation**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	Mid Sussex District Council
Lewes District Council		Rother District Council	
Tunbridge Wells Borough Council			
Tandridge District Council			

Eastbourne Borough Council			
Crawley Borough Council			
Natural England			
Sevenoaks District Council			
West Sussex County Council			

- 2.17 Rother District Council has no position in regards to the approach set out above for the following reasons: While Rother District Council agrees with the use of AADT as a basis for assessing traffic flows, it has not undertaken recent traffic modelling outside of Bexhill area, so has not considered the use of base flow data. Rather, it draws on the most recent traffic survey results from East Sussex County Council.
- 2.18 Mid Sussex District Council reserves judgement in regards the approach set out above for the following reasons: Mid Sussex believes that this should be the most recent robust and validated data source and this may refer to more recent years.

### ***Trip Generation Methodology***

- 2.19 Use of TRICS<sup>7</sup> rates. TRICS is the national standard system of trip generation and analysis in the UK, and is used as an integral and essential part of the Transport Assessment process. The system allows its users to establish potential levels of trip generation for a wide range of development and location scenarios.

**Table 7: Signatory position on trip generation methodology**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		Natural England	
Lewes District Council			
Tunbridge Wells Borough Council			
Tandridge District Council			
Eastbourne Borough Council			
East Sussex County Council			
Crawley Borough Council			
Sevenoaks District Council			
West Sussex County Council			
Mid Sussex District Council			
Rother District Council			

<sup>7</sup> <http://www.trics.org/>

2.20 These named authorities agree with this approach for the following reasons. The approach outlined above is supported on the basis that TRICS is the most robust available system for LPAs to use in their respective modelling exercises.

***Demand changes assessed in study***

2.21 The demand changes assessed are housing and employment. Employment figures are either provided directly by the local authority or TEMPRO includes allowances for growth in jobs. Housing numbers are identified using the methodology set out in paragraphs 2.5 and 2.8 of this SCG. These are per annum based on Local Plans, or alternatively Objectively Assessed Need (as agreed in this Statement) to be used in the National Trip End Model Program (TEMPRO). The growth rate is adjusted according to each scenario as appropriate.

**Table 8: Signatory position on the demand changes assessed in study**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		Natural England	
Lewes District Council			
Tunbridge Wells Borough Council			
Eastbourne Borough Council			
Sevenoaks District Council			
Tandridge District Council			
West Sussex County Council			
Crawley Borough Council			
Mid Sussex District Council			
Rother District Council			
East Sussex County Council			

2.22 The named authorities agree with this approach for the following reasons. TEMPRO is an industry standard database tool across Great Britain, provided by the Department for Transport and therefore forecasting using TEMPRO has a high degree of consistency. TEMPRO can be adjusted with emerging plan figures (as agreed in this Statement) to reflect the latest updates in expected growth.

***Forecasting Growth***

2.23 There are two key elements to the forecasting of growth arising from Local Plans:

- In combination assessment of the proposed Local Plan with other plans. For this the ‘Do Something’ (i.e. the proposed Local Plan) compared with the Base (i.e. all expected traffic growth over the assessment period).
- The relative contribution of the Local Plan in question to that in combination change. This is difference between Do Something (i.e. with Local Plan) and Do Nothing (without the

Local Plan). To forecast the ‘Do nothing’ background growth, which is the likely growth of traffic to arise without the proposals set out in the development plan being assessed, the current issued version of TEMPRO available at the date of commencing transport study work is used. TEMPRO is based on a combination of trend based and plan based forecasting, including growth totals for households and jobs at Local Planning Authority level from adopted Local Plans at the time when updating started for the TEMPRO version being used. TEMPRO does not assume that specific housing or employment site allocations or planning consents do or do not go ahead. The difference between the ‘Do Nothing’ scenario and the scenario which includes the development plan being assessed, shows the relative contribution of that development plan to changes in traffic movements.

**Table 9: Signatory position on forecasting background growth**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		Natural England	Mid Sussex District Council
East Sussex County Council			
Tandridge District Council			
Lewes District Council			
Eastbourne Borough Council			
Sevenoaks District Council			
West Sussex County Council			
Crawley Borough Council			
Tunbridge Wells Borough Council			
Rother District Council			

- 2.24 The named authorities agree with this approach for the following reasons: The approach outlined above follows a logical, clear and robust methodology and uses TEMPRO - an industry standard database tool across Great Britain and therefore forecasting using TEMPRO has a high degree of consistency. It shows the predicted in combination growth of a Local Plan with other plans and projects along with the predicted relative contribution of that Local Plan to any change.
- 2.25 Mid Sussex District Council reserves judgement in regards the approach set out above for the following reasons: Mid Sussex agrees with the use of TEMPRO as a source of basic growth assumptions, but suggests that care is needed in the specification of the ‘do nothing’ or reference case and development plan case.

**Air quality calculations**

2.26 The key features of the air quality calculations methodology are set out in Appendix 6 of this Statement. The AFWG has discussed the following elements of air quality calculations, which are used to support the air quality HRA work and agree/disagree with the following:

**Chemicals monitored and assessed in forecasting**

2.27 Nitrogen oxides (NO<sub>x</sub> which includes nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>)), Nitrogen deposition (N), Acid Deposition, and ammonia (NH<sub>3</sub>). The chemicals listed here (excluding ammonia) are those included within the standard methodology<sup>8</sup>.

**Table 10: Signatory position on the chemicals to be monitored and assessed in forecasting**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	
Lewes District Council		West Sussex County Council	
Eastbourne Borough Council			
Natural England			
Crawley Borough Council			
Sevenoaks District Council			
Tunbridge Wells Borough Council			
Rother District Council			
Tandridge District Council			
Mid Sussex District Council			

2.28 The named authorities agree with this approach for the following reasons. The approach outlined above is based on the industry standard methodology. Ammonia is agreed to be included as best practice going forward in assessment of Ashdown Forest on the basis of specific suitable evidence available.

2.29 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council: WSCC are not actively involved in this work to date.
- East Sussex County Council: ESCC are not actively involved in this work to date.

**Conversion rates from NO<sub>x</sub> to N**

2.30 This process involves two stages. Firstly, NO<sub>x</sub> to NO<sub>2</sub> conversion is calculated using Defra’s NO<sub>x</sub> to NO<sub>2</sub> calculator. Secondly, for N deposition, the NO<sub>2</sub> value is multiplied by 0.1, as set

<sup>8</sup> Design Manual for Roads and Bridges, Chapter 11, Section 3, Annex F

out in the Design Manual for Roads and Bridges<sup>9</sup> (DMRB) guidance. The multiplication of NO<sub>x</sub> concentrations by a factor is a standard approach set out in DMRB and in Environment Agency guidance<sup>10</sup> or as provided in updated guidance.

**Table II: Signatory position on conversion rates from NO<sub>x</sub> to N**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		West Sussex County Council	Mid Sussex District Council
Lewes District Council		East Sussex County Council	
Eastbourne Borough Council			
Crawley Borough Council			
Natural England			
Sevenoaks District Council			
Tandridge District Council			
Tunbridge Wells Borough Council			
Rother District Council			

- 2.31 The named authorities agree with this statement for the following reasons. The approach outlined follows established guidance as set out in the Design Manual for Roads and Bridges and by the Environment Agency.
- 2.32 These named authorities have no position in regards to this approach for the following reasons:
- West Sussex County Council: WSCC are not actively involved in this work to date
  - East Sussex County Council: ESCC are not actively involved in this work to date.
- 2.33 Mid Sussex District Council reserves position in regards the approach set out above for the following reasons: Mid Sussex reserves its position and will take advice from its advisors on this issue at the point of future assessment.

**Background improvement assumptions**

- 2.34 The only Government guidance on this issue (from Defra and DMRB) indicates that an improvement in background concentrations and deposition rates of 2% per annum should be assumed. However, the modelling undertaken by AECOM takes a more cautious approach. Improvements in background concentrations and emission rates follow Defra/DMRB assumed improvements up to 2023, but with background rates/concentrations then being frozen for

<sup>9</sup> The Design Manual for Roads and Bridges:  
<http://www.standardsforhighways.co.uk/ha/standards/dmrb/index.htm>

<sup>10</sup> Environment Agency. (2011). *Air Quality Technical Advisory Group 06 - Technical guidance on detailed modelling approach for an appropriate assessment for emissions to air.*

the remainder of the plan period. This is considered a realistic worst case and, averaged over the plan period, is in line with known trends in nitrogen deposition.

**Table 12: Signatory position on background improvement assumptions set out in paragraph 2.39**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	Mid Sussex District Council
Lewes District Council		West Sussex County Council	
Tandridge District Council		Crawley Borough Council	
Eastbourne Borough Council			
Natural England			
Sevenoaks District Council			
Tunbridge Wells Borough Council			
Rother District Council			

2.35 The named authorities agree with this statement for the following reasons: The approach outlined above is considered robust and reasonable. It takes a precautionary approach using a realistic worst case scenario. There is a long history of improving trends in key pollutants (notably NO<sub>x</sub>) and in nitrogen deposition rates, and there is no reason to expect that will suddenly cease; on the contrary, there is every reason to expect the rate of improvement to increase as more national and international air quality improvement initiatives receive support.

2.36 These named authorities have no position in regards to this approach for the following reasons:

- Crawley Borough Council; the evidence to support the adopted Local Plan screened out the need to undertake an air quality assessment and therefore Crawley has no position as we have not commissioned expertise
- West Sussex County Council: WSCC are not actively involved in this work to date.
- East Sussex County Council: ESCC are not actively involved in this work to date.

2.37 Mid Sussex District Council reserves position in regards the approach set out above for the following reasons: Mid Sussex reserves its position and will take advice from its advisors on this issue at the point of future assessment.

***Rate of dispersal from the road***

2.38 The use of the dispersion model ADMS-Roads, by Cambridge Environmental Research Consultants, calculating at varied intervals back from each road link from the centre line of the road to 200m, with the closest distance being the closest point to the designated sites to the road.



**Table 13: Signatory position on the rate of dispersal from the road used**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	Mid Sussex District Council
Lewes District Council		West Sussex County Council	
Tandridge District Council			
Eastbourne Borough Council			
Natural England			
Crawley Borough Council			
Sevenoaks District Council			
Tunbridge Wells Borough Council			
Rother District Council <sup>11</sup>			

2.39 The named authorities agree with this statement for the following reasons: This approach follows the Department of Transport’s Transport Analysis Guidance which advises “Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant”. In modelling work undertaken for the HRA for the South Downs Local Plan and Lewes District Local Plan, modelled transects show that NOx concentrations and nitrogen deposition rates are forecast to fall to background levels well before 200m from the roadside, therefore there is no value in extending transects any further.

2.40 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council: WSCC are not actively involved in this work to date
- East Sussex County Council: ESCC are not actively involved in this work to date.

2.41 Mid Sussex District Council reserves position in regards the approach set out above for the following reasons: Mid Sussex reserves its position and will take advice from its advisors on this issue at the point of future assessment.

***Type of habitat included in the assessment e.g. woodland and heathland***

2.42 Taking the precautionary approach it is assumed that pristine heathland (the SAC feature) is present, or could be present in the future, at any point on the modelled transects irrespective of existing habitat at that location. However, it is recognised that in practice there are affected areas in which heathland is not present and may never be present (as outlined by Natural England below) and this would need including in ecological interpretation of results’.

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<sup>11</sup> RDC’s position is one of agreement, on the express basis (perhaps as a footnote) that this is accepted as being the reasonable the position of Natural England, as the Government’s advisors.

**Table 14: Signatory position on the type of habitat included in the assessment**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	
Tandridge District Council		West Sussex County Council	
Lewes District Council			
Eastbourne Borough Council			
Natural England			
Crawley Borough Council			
Tunbridge Wells Borough Council			
Sevenoaks District Council			
Rother District Council <sup>12</sup>			
Mid Sussex District Council			

2.43 Natural England add: This is an appropriate method for screening but on the ground it is rarely the case that all areas of a designated site will include all designated features. There are a number of reasons for this; sometimes features are SSSI notified but not part of the SAC/SPA notification and often a site boundary runs to a recognisable feature such as a field boundary or road for practicality reasons. Therefore areas of site may be considered site fabric as they do not contain and never will contain notified features of an N2K designation. This is something that is considered on a site by site basis dependant on specifics and on conservation objectives. If required the “on the ground” characteristics may be used for more detailed screening or if further assessment is required to ascertain whether plans or projects will have an adverse effect on the integrity of the site.

2.44 The named authorities agree with this statement for the following reasons. The approach outlined above takes an appropriate, precautionary and practical approach in modelling and ecological interpretation.

2.45 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council are not actively involved in this work to date
- East Sussex County Council are not actively involved in this work to date.

**Ecological Interpretation**

2.46 The section covers principles and methodology for the interpretation of the air quality modelling work to understand the impact of air quality changes on the ecology of Ashdown Forest SAC.

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<sup>12 12</sup> RDC’s position is one of agreement, on the express basis (perhaps as a footnote) that this is accepted as being the reasonable the position of Natural England, as the Government’s advisors.

- 2.47 The development of dose-response relationships for various habitats<sup>13</sup> clarifies the rate of additional nitrogen deposition that would result in a measurable effect on heathland vegetation, defined as the loss of at least one species from the sward. For lowland heathland it is indicated that deposition rates of c. 10-15kgN/ha/yr (representative of the current and forecast future deposition rates using background mapping) an increase of 0.8-1.3kgN/ha/yr would be required for the loss of one species from the sward<sup>14</sup>. The sites covered in the research had a range of different 'conditions' but the identified trends were nonetheless observable. The fact that a given heathland site may not have been included in the sample shouldn't be a basis for the identified trend to be dismissed as inapplicable. On the contrary, the value of the dose-response research is precisely in the fact that it covered a range of sites, subject to a mixture of different influences, meaning that consistent trends were identified across sites despite differing conditions at the sites involved. Based on the consistent responses (in terms of trend) across the range of habitats studied there is no reason why the identified trends (which have been identified as applying to bogs, lowland heathland, upland heathland, dunes and a range of other habitats) should not apply to all types of heath.
- 2.48 There is a legal need to consider/identify whether there is an 'in combination' effect. However, there is no automatic legal assumption that all contributors to any effect must then mitigate/address their contribution, no matter how small. Not all contributors to an effect will be equal. Far more likely is that there will be a small number of contributors who are responsible for the majority of the exceedance. The identification of those contributors who need to mitigate must be ultimately based on whether mitigating/removing their specific contribution will actually convey any protection to the European site in terms of achieving its conservation objectives (since this is the purpose of the Habitats Directive) and/or whether mitigating the contribution of certain contributors to any effect will sufficiently mitigate that effect.
- 2.49 Within the context of a forecast net improvement in nitrogen deposition, rather than a forecast net deterioration, available dose-response data make it possible to gauge whether the air quality impact of a given plan is not just of small magnitude (which could still meaningfully contribute to an effect 'in combination') but of such a small magnitude that its contribution may exist in theory (such as in the second decimal place of the air quality model) but not in practice on the ground. Such a plan would be one where it could be said with confidence that: (a) there would not be a measurable difference in the vegetation whether or not the plan proceeded, and (b) there would not be a measurable effect on the vegetation whether or not the contribution of the plan was 'mitigated' (i.e. reduced to the extent that it did not appear in the model at all). It would clearly be unreasonable to claim that such a plan would cause adverse effect 'in combination' or that it should be mitigated.

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<sup>13</sup> Caporn, S., Field, C., Payne, R., Dise, N., Britton, A., Emmett, B., Jones, L., Phoenix, G., S Power, S., Sheppard, L. & Stevens, C. 2016. Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance. Natural England Commissioned Reports, number 210.

<sup>14</sup> The cited rates are presented Table 21, page 59 of Caporn et al 2016, to illustrate the trends identified (which apply not just to species richness but, as illustrated by other tables in the same report, to other parameters). That table states that at a background rate of 10kgN/ha/yr an additional 0.3 kgN/ha/yr was associated with a reduction in species richness of '1' in lowland heathland sites. At a background rate of 15kgN/ha/yr the same effect was associated with an incremental increase of 1.3 kgN/ha/yr.

**Table 15: Signatory position on ecological interpretation as part of assessments**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		West Sussex County Council	
Lewes District Council		East Sussex County Council	
Tandridge District Council			
Eastbourne Borough Council			
Natural England			
Crawley Borough Council			
Tunbridge Wells Borough Council			
Sevenoaks District Council			
Rother District Council <sup>15</sup>			
Mid Sussex District Council			

2.50 These named authorities agree with this opinion for the following reasons: The approach outlined above takes an appropriate, precautionary and practical approach in modelling and ecological interpretation.

2.51 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council are not actively involved in this work to date.
- East Sussex County Council are not actively involved in this work to date.

**Need for mitigation or compensation measures**

2.52 The AFWG has discussed the possible findings of air quality work currently being undertaken, including the potential need for mitigation or compensation for air quality impacts associated with growth identified in Local Plans.

2.53 At present, published HRAs for adopted or emerging Local Plans have not concluded that mitigation or compensation is currently required. However, it is also recognised that the outcomes of ongoing technical modelling and assessments cannot be predicted or pre-determined. In this light, the AFWG recognises the value of early discussion of as a ‘back-pocket’ exercise, just in case they subsequently prove necessary. It is emphasised that initial suggestions and consideration of potential mitigation/solutions/compensation should not be interpreted as either a recognition that they will prove necessary, nor as a commitment to eventually pursuing such measures.

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<sup>15</sup> <sup>15</sup> RDC’s position is one of agreement, on the express basis (perhaps as a footnote) that this is accepted as being the reasonable the position of Natural England, as the Government’s advisors.

2.54 It is recognised that Wealden District Council as the SAC host, and Natural England, will necessarily have the key lead roles in identifying potential mitigations and/or compensation to benefit the SAC, although all parties may contribute. It is agreed to maintain a table of mitigation options in a transparent manner on an ongoing basis. This should enable all parties to be fully prepared for the possibility of needing to address effects on the SAC, enabling them to do so (if required) without causing undue delay to the planning process.

**Table 16: Signatory position with regard to the need for mitigation or compensation measures**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	
Sevenoaks District Council		West Sussex County Council	
Lewes District Council			
Eastbourne Borough Council			
Tandridge District Council			
Tunbridge Wells Borough Council			
Crawley Borough Council			
Natural England			
Rother District Council			
Mid Sussex District Council			

2.55 These named authorities have no position in regards to this opinion for the following reasons:

- West Sussex County Council are not actively involved in this work to date.
- East Sussex County Council are not actively involved in this work to date.

### 3. Actions going forward

3.1 The members of the AFWG will continue to work together constructively, actively and on an on-going basis toward a consensus on the matter of air quality impacts on Ashdown Forest SAC associated with growth identified in Local Plans. The AFWG will continue to share evidence and information, and will work cooperatively together to discuss potential mitigation measures just in case need for these should arise, and will consider other measures to reduce the impact of nitrogen deposition around the Forest as matter of general good stewardship.



3.2 The Government consultation document ‘Planning for the right homes in the right places’ proposes as a minimum that SCG will need to be updated each time a signatory authority reaches a key milestone in the plan making process. The AFWG recognises that this SCG will need to be updated regularly in line with emerging Government policy and in order to reflect emerging evidence and established knowledge of air quality impact on European nature conservation designations.

**Table 17: Signatory position on actions going forward for the AFWG**

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority			
Sevenoaks District Council			
Tandridge District Council			
Lewes District Council			
East Sussex County Council			
Eastbourne Borough Council			
Crawley Borough Council			
Natural England			
West Sussex County Council			
Tunbridge Wells Borough Council			
Rother District Council			
Mid Sussex District Council			

#### **4. Summary conclusions**

- 4.1 This Statement of Common Ground has been signed by the following authorities and will be submitted by the SDNPA as part of the evidence base supporting the South Downs Local Plan in April 2018.



Signature: 
Logo: 
Date: 12/04/2018
Position: Director of Planning
Authority: South Downs National Park Authority

Signature 
Logo: 
Date 03/04/2018
Position: Head of Planning (Officer)
Authority: Lewes District and Eastbourne Borough Councils

Signature: 
Logo: 
Date: 09/04/2018
Position: Head of Strategic Housing and Planning Services (Officer)
Authority: Crawley Borough Council

Signature : 
Logo: 
Date: 12/04/2018
Position: Chief Executive
Authority: Mid Sussex District Council

Signature: 
Logo: 
Date: 04/04/2018
Position: Head of Planning & Environment
Authority: East Sussex County Council

Signature: 
Logo: 
Date 09/04/2018
Position: Sustainable Development Senior Adviser - Sussex and Kent Team
Organisation: Natural England

Signature: 
Logo: 
Date: 12/04/2018
Position: Director of the Strategy & Planning Service
Authority: Rother District Council

Signature: 
Logo: 
Date: 03/04/2018
Position: Head of Planning and Transportation
Authority: Tunbridge Wells Borough Council

Signature: 
Logo: 
Date: 06/04/2018
Position: Chief Planning Officer
Authority: Sevenoaks District Council

Signature: 
Logo: 
Date: 09/04/2018
Position: Head of Planning Services
Authority: West Sussex County Council

Signature: 
Logo: 
Date: 30/03/2018
Position: Strategic Director of Place
Authority: Tandridge District Council



## **Appendix I: Ashdown Forest SAC Reasons for Designation**

The text below is extracted from the Habitats Regulations Assessment for the Pre-submission South Downs Local Plan, published for consultation in September 2017.

### **I.1 Introduction**

Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England, with both European dry heaths and, in a larger proportion, wet heath.

### **I.2 Reasons for Designation**

#### SAC criteria

The site was designated as being of European importance for the following interest features:

Wet heathland and dry heathland

Great crested newts

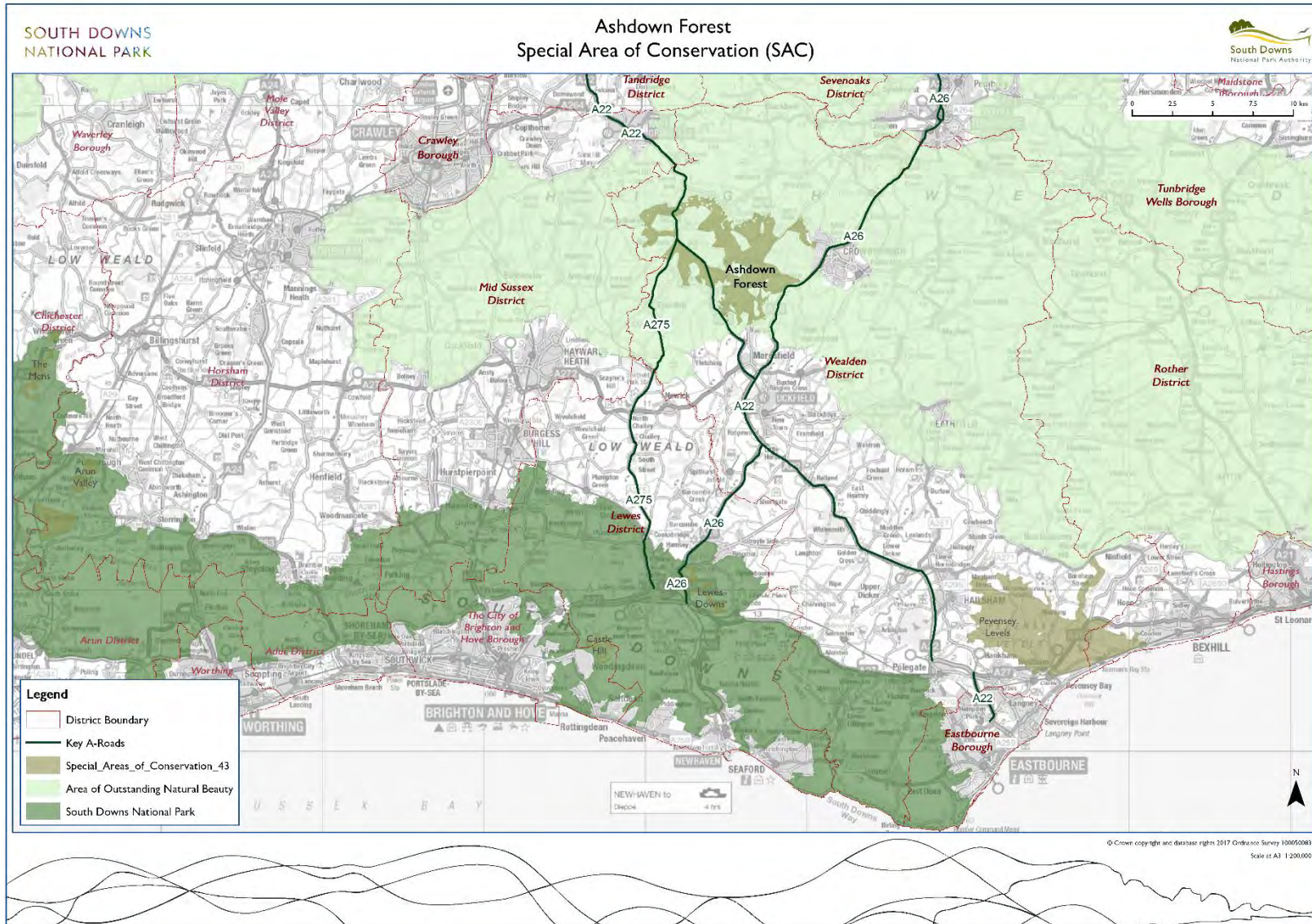
### **I.3 Historic Trends and Current Pressures**

During the most recent condition assessment process, 99% of the SSSI was considered to be in either 'favourable' or 'unfavourable recovering' condition.

The following key environmental conditions were identified for Ashdown Forest SAC/SPA:

- Appropriate land management
- Effective hydrology to support the wet heathland components of the site
- Low recreational pressure
- Reduction in nutrient enrichment including from atmosphere.

## Appendix 2: Map of Ashdown Forest



### **Appendix 3: Notes from Ashdown Forest Working Group meetings: May 2017 to January 2017**

These meeting notes are a summary of officer discussions. The SCG sets out the final positions of each of the signatory organisations at the time of signing and where there are discrepancies the SCG takes precedence.

NOTES OF MEETING ASHDOWN FOREST 10:00 AM, 9<sup>TH</sup> MAY 2017 EASTERN AREA OFFICES, STANMER PARK, BRIGHTON & HOVE

Attendees:

Marian Ashdown (MA) – Natural England  
 Marina Briggingshaw (MB) – Wealden District Council  
 Sharon Evans (SE) - Tunbridge Wells Borough Council  
 Jennifer Hollingum (JH) - Mid Sussex District Council  
 Ellen Reith (ER) – East Sussex County Council  
 Kelly Sharp (KS) – Wealden District Council  
 Tondra Thom (TT) – Lewes and Eastbourne Councils  
 Sarah Thompson (ST) – Tandridge District Council  
 Chris Tunnell (CT) – Mid Sussex District Council  
 Lucy Howard (LH) – South Downs National Park Authority  
 Sarah Nelson (SN) - South Downs National Park Authority  
 Kate Stuart (KS) - South Downs National Park Authority  
 Alma Howell (AH) - South Downs National Park Authority

<b>1. Introductions and Reasons for Meeting</b>	<b>Actions</b>
LH outlined the aims of this meeting which are to discuss: <ul style="list-style-type: none"> <li>• agreeing to work collaboratively on the issues;</li> <li>• agreeing to share information and existing work to assist in traffic modelling for HRA work;</li> <li>• setting up a working group.</li> </ul>	
<b>2. Key stages with Local Plans and HRA timetables</b>	
SDNPA's Local Plan - Pre-Submission Consultation in September 2017 Tunbridge Wells Local Plan - Issues and Options consultation this Autumn Wealden Local Plan - Pre-Submission Consultation this Autumn Lewes Local Plan Part 2 – Allocations and DM Policies - Pre-Submission Consultation this Autumn Tandridge Local Plan - Pre-submission public consultation early next year Mid Sussex Local Plan – At Examination	

<p><b>3. Moving on from High Court Decision</b></p> <p>LH highlighted that we now need to draw a line under the High Court decision as there will be no appeals or cross appeals. She explained that the group should agree to move forward together to address in combination effects of traffic generation on Ashdown Forest SAC and other affected SAC's.</p>	<p>All agreed to acknowledge the ruling and agreed to move forward together to address the in combination effects of traffic generation on Ashdown Forest SAC and other SACs</p>
<p><b>4. Wealden DC's latest work on HRA and Ashdown Forest</b></p> <p>LH introduced this item explaining that WDC had undertaken a large amount of work on this matter and that it would be very useful to the group if WDC could set out the main studies, timetables and output for this work. This is because all local authorities affected by this issue need to be broadly using the same information and working from the same base conditions.</p> <p>MB and KS outlined the work that Wealden had undertaken over the last four years which includes air pollution monitoring on the forest, traffic monitoring, ecology work and transport modelling of future scenarios looking at Wealden's growth alone and in combination with other local authorities. MB agreed to set out in an email to the group the methodologies of the work undertaken so far.</p> <p>LH also mentioned the email that David Scully from Tunbridge Wells had sent to her in advance of the meeting raising a number of technical questions with regards to Wealden's work. MB agreed to try and answer the queries if the email could be sent directly to her and she would copy her response to all. It was also suggested that it would be helpful if this email also explained the issue with using 1000 AADT as the threshold rather than 1% process contribution.</p>	<p>MB to send an email to all setting out the details of methodology of work undertaken so far.</p> <p>LH to send David Scully's email to MB and cc all</p> <p>MB to reply including in her response the issue re:1000 AAD and cc all</p>
<p><b>5. Natural England's latest work on air quality methodology for HRA's</b></p> <p>MA explained that in combination effects relating to air pollution on SAC's are complex and widespread and that this is a national issue and a priority for NE. NE has set up a project group to look specifically at this issue in relation to all protected sites in the South East that have exceeded their critical load. New internal guidance is being prepared to help NE specialists provide advice to local authorities undertaking HRA's and will be available in mid-June. This will include where to obtain data, habitat trends, APIS information etc. as well as guidance on policy, avoidance and compensatory measures. The group agreed that it would be useful if some of this information could be sent directly to them.</p> <p>MA questioned why Rother had not been included in this group. It was agreed that Rother, Crawley and Brighton and Hove should be included. MB agreed to check with their consultants where they felt the main traffic movements were occurring and which authorities were affected.</p>	<p>MA to send to group useful information from this guidance</p> <p>LH to invite Rother, Crawley and B&amp;H to be part of group and attend future meetings.</p>

	<p>MB to check with consultant s which other local authorities are likely to be affected by this issue</p>
<p><b>6. Sharing and Understanding evidence</b></p> <p>LH said that we need to share what information we have and need.</p> <p>The first year of Wealden’s air pollution monitoring baseline data is in the public domain. Wealden are unable to share other year’s data and outcomes at the present time as they need to be sure, before it enters the public arena, that it is robust and the peer review has been completed. The peer review of this work is being undertaken by academics at The Centre of Hydrology and Ecology. A report setting out the results of this work would likely be published in July/August of this year. Wealden are willing to give raw data to Natural England for their specialist to interpret. NE will specify what they need to MB/KS who will endeavour to provide this.</p> <p>Mid Sussex has used the West Sussex Transport Model and TEMPRO data to assess in combination effects. They are looking at possible areas of the District where development here would not generate traffic on Ashdown Forest.</p>	<p>LH to circulate table to ascertain who has what information</p> <p>MA to speak to NE’s air pollution specialists to identify what data they need. MA then to email MB/KS who will supply the data and cc the group</p>
<p><b>7. Policy solution options to Nitrogen deposition</b></p> <p>The group discussed possible wider longer term solutions such as the creation of a Low Emission Zone and improvements to A27.</p> <p>MA explained that NE wished to encourage the creation of Shared Nitrogen Action Plans (SNAPs) which is something this group could establish and lead on as a way of reducing background levels of Nitrogen. The biggest contributor to nitrogen deposition on the Ashdown Forest is agriculture. All agreed that this would be a useful way forward for the group and would highlight that the local authorities were working collaboratively and identifying solutions. Developer contributions could be used to fund projects identified from this to reduce Nitrogen levels</p> <p>JH highlighted that there was some information on SNAPs on the NE website and she would send the links to this to the group.</p>	<p>JH to send web link to SNAPs to group. All agreed that this group should establish a SNAP as a way forward and longer term solution</p>
<p><b>8. Working Collaboratively as an Officer Group</b></p> <p>All agreed that the setting up of this group was extremely useful and that we should meet monthly. SDNPA would service the group in terms of chair, agenda and minutes. The venue would alternate between Stanmer and Mid Sussex and possibly a community centre in Wealden. MA explained that Tuesdays were not a good day for her to meet and the group proposed Wednesday as an alternative.</p>	<p>All agreed to set up a working group on Ashdown Forest</p> <p>SDNPA to send out notes of meeting and make arrangements for next monthly meeting.</p>

<p>In terms of cross boundary working and Member Briefing it was felt that the East Sussex Local Planning Managers Group and East Sussex Strategic Planning Members Group might be useful bodies to report to. However it was recognised that Mid Sussex, Tandridge and Tunbridge Wells were not members of these groups. It was important that officers reported back to their own members.</p>	
<p><b>9. AOB</b>                  CT raised the issue of current planning applications that are caught by the High Court Ruling and whether Grampian conditions might be a way forward. MB suggested that this should only be considered once an HRA of the application had been carried out. However in the first instance she advised that a legal opinion should be sought.</p>	

NOTES OF MEETING ASHDOWN FOREST 10:00 AM, 21<sup>st</sup> JUNE 2017 EASTERN AREA OFFICES, STANMER PARK, BRIGHTON & HOVE

Attendees:

- Marian Ashdown (MA) – Natural England
- Marina Briggingshaw (MB) – Wealden District Council
- Sharon Evans (SE) - Tunbridge Wells Borough Council
- Hannah Gooden (HG) – Sevenoaks District Council
- Lucy Howard (LH) – South Downs National Park Authority
- Pat Randall (PR) – East Sussex County Council
- Ellen Reith (ER) – East Sussex County Council
- Vivienne Riddle (VR) – Tandridge District Council
- David Scully (DS) – Tunbridge Wells Brough Council
- Kate Stuart (KS) - South Downs National Park Authority
- Tondra Thom (TT) – Lewes and Eastbourne Councils
- Sarah Thompson (ST) – Tandridge District Council
- David Marlow (DM) - Rother District Council

<p><b>10. Introductions and reasons for meeting</b></p> <ul style="list-style-type: none"> <li>• Group introduced themselves and welcomed new attendees.</li> </ul>	<p><b>Actions</b></p>
<p><b>11. Minutes and actions from last meeting</b></p> <p>Group went through the minutes to check actions were completed.                  Key updates to note:</p>	<ul style="list-style-type: none"> <li>• LH to ask Mid Sussex for contact at Crawley</li> <li>• LH to invite West Sussex County</li> </ul>

<ul style="list-style-type: none"> <li>• Natural England Guidance – not yet available as it is still being developed. The internal guidance document will be made available to staff at Natural England and it is hoped that the salient points can be picked out in order to assist LPAs with their Appropriate Assessments.</li> <li>• Attendees of the group – agreed that Crawley, Brighton (Steve Tremlett suggested as contact point) and West Sussex to be invited to the group, and that Kent and Surrey County Councils should be made aware of the group.</li> <li>• Evidence table (outlines the evidence held by authorities which are part of the group) – agreed that completing this now is premature as there is a lot of evidence/assessment currently being undertaken/finalised. Agreed that it should be filled out in the autumn.</li> <li>• NE were to make a detailed request to WDC about what data they would like to see – NE and WDC are in discussion.</li> </ul>	<p>Council and Brighton to next meeting</p> <ul style="list-style-type: none"> <li>• LH to make Kent and Surrey County Councils aware of the group</li> </ul>
<p><b>12. Legal advice sought on Ashdown Forest</b></p> <ul style="list-style-type: none"> <li>• Legal advice already sought by TWBC.</li> <li>• Technical advice intended to be sought by WDC (primarily to do with PDL) and also LDC and SDNPA.</li> <li>• Advised that the latest position from Mid Sussex is available on their website. MSDC hearings regarding Ashdown Forest to be held on 24/25<sup>th</sup> July.</li> </ul>	<ul style="list-style-type: none"> <li>• LH to share QC comments on Ashdown Forest from the Minerals Conference</li> <li>• ALL – those getting legal advice to share the gist of that advice with the group.</li> </ul>
<p><b>13. Air quality and traffic modelling updates</b></p> <ul style="list-style-type: none"> <li>• All agreed in principle to use broadly the same modelling approach (other than WDC as already progressed with own model).</li> <li>• All agreed in principle to share data to ensure consistency of inputs in models.</li> <li>• It is noted that all except WDC and MSDC are using AECOM for HRA work.</li> <li>• Discussed at what point development levels are taken into account – adoption/submission/publication? It was noted that TEMPRO uses growth figures as of 2014 TEMPRO can be adjusted to take into account subsequent Local Plan proposals.</li> <li>• It was noted that WDC have assessed all roads across Ashdown Forest, not just A roads.</li> <li>• It was commented that using travel to work data in the model may underestimate movements and therefore the associated impact of visitor numbers.</li> <li>• WDC do not have a date for the release of their HRA work – likely end of August.</li> </ul>	<ul style="list-style-type: none"> <li>• ALL – agreed to share data inputs for model.</li> <li>• LDC/SDNPA ask James Riley re. impact of visitors.</li> </ul>
<p><b>14. Progress with Local Plans</b></p> <ul style="list-style-type: none"> <li>• All progressing with Local Plans as per previous meeting.</li> <li>• WDC advised there is a delay in their timetable. WDC are looking to commence pre-submission consultation by the end of the year. WDC met with DCLG and had a positive meeting – no discussion of the phasing policy.</li> </ul>	
<p><b>15. Long term solutions including Strategic Nitrogen Action Plans (SNAP)</b></p>	

<ul style="list-style-type: none"> <li>• Agreed that this item would be held until a future meeting once HRA work has been progressed by authorities and findings are available.</li> <li>• Noted that Cath Jackson of NE is to be covering Ashdown Forest. Cath Jackson will be at the next meeting and a possible SNAP could be discussed then.</li> <li>• There was a discussion about SNAP. NE advise that SNAP is not suitable as mitigation because it doesn't have sufficient certainty.</li> </ul>	
<p><b>16. Wealden DC to provide an update on their transport model</b></p> <ul style="list-style-type: none"> <li>• Technical note on transport model circulated to authorities for their information. Update now received which looks at contribution from other authorities. WDC advise they are happy to circulate update.</li> </ul>	<p>MB – circulate update to office group.</p>
<p><b>17. AOB</b></p> <ul style="list-style-type: none"> <li>• WDC noted that there is an article in the HRA Journal that may be of interest which queries the 1%. Advised that the journal is subscription only.</li> <li>• WDC advise they are happy to share evidence individually with authorities, but also advise that some evidence is not yet feasible to share.</li> <li>• Agreed that the next meeting would be in August and held at MSDC offices in Haywards Heath.</li> </ul>	<p>LH – arrange next meeting for August JH – arrange meeting room at MSDC offices in Haywards Heath.</p>

NOTES OF MEETING ASHDOWN FOREST 10:00 AM, 30<sup>th</sup> AUGUST 2017 MID SUSSEX DISTRICT COUNCIL, HAYWARDS HEATH

Attendees:

Marian Ashdown (MA) – Natural England (NE)

Marina Briggishaw (MB) – Wealden District Council (WDC)

Kelly Sharp (KS) – Wealden District Council

Nigel Hannam (NH) – Wealden District Council

Hannah Gooden (HG) – Sevenoaks District Council

Jennifer Hollingum (JH) – Mid Sussex District Council (MSDC)

Lucy Howard (LH) – South Downs National Park Authority

Katharine Stuart (KS) – South Downs National Park Authority

David Marlow (DM) – Rother District Council

Ellen Reith (ER) – East Sussex County Council (ESCC)

Edward Sheath (ES) – East Sussex County Council



David Scully (DS) – Tunbridge Wells Borough Council (TWBC)

Aidan Thatcher (AT) – Lewes and Eastbourne Councils

Tondra Thom (TT) – Lewes and Eastbourne Councils (LDC)

Roger Comerford (RC) – Tandridge District Council

Ian Bailey – Tonbridge & Malling Borough Council

<b>AGENDA ITEM</b>	<b>ACTION</b>
<p><b>18. Introductions and minutes from last meeting</b></p> <ul style="list-style-type: none"> <li>• Group introduced themselves and welcomed new attendees.</li> <li>• LH apologised for the lateness in sending out the minutes. Two corrections were agreed and revised minutes to be circulated. The following actions were still noted as outstanding:               <ul style="list-style-type: none"> <li>- LH to contact Crawley BC, WSCC, Surrey CC and Brighton &amp; Hove CC</li> <li>- Update on WDC transport model not yet published although a technical note is available on line<sup>16</sup>.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• LH to ask Mid Sussex for contact at Crawley</li> <li>• LH to invite West Sussex County Council and Brighton to next meeting</li> <li>• LH to make Kent and Surrey County Councils aware of the group</li> </ul>
<p><b>19. Wealden DC to provide update on air quality and ecology monitoring (MB)</b></p> <ul style="list-style-type: none"> <li>• WDC have received draft air quality reports on Pevensey Levels and Lewes Downs</li> <li>• WDC have received draft reports on air quality and ecology for Ashdown Forest. These are being checked through. Changes are needed to explain the outcomes from the model and statistical analysis more clearly.</li> <li>• Once agreed with consultants WDC will share with NE.</li> <li>• WDC committed to share with members of group after NE and before publication on website. This will hopefully be in September 2017.</li> <li>• LH queried the background nitrogen deposition text to A22 which at 50kgN/ha/year is much higher than the Defra mapping levels. MB explained that the Defra figures are the average across the SAC, whereas the WDC figures are by 2metres squared, i.e. more finely grained analysis.</li> <li>• NH explained that WDC and ESCC were working on expression of interest bids to the Housing &amp; Infrastructure Fund on the introduction of mitigation and compensatory work for Ashdown Forest. The focus would be on low emission zones. Support from members of the group would help the expression of interest. A very swift turn around on the bid is</li> </ul>	<ul style="list-style-type: none"> <li>• WDC to share air quality and ecology monitoring first with NE then the wider group in September or shortly afterwards.</li> <li>• NH/ES/LH to draft wording and circulate around the group for agreement.</li> </ul>

<sup>16</sup>

[http://www.wealden.gov.uk/Wealden/Residents/Planning\\_and\\_Building\\_Control/Planning\\_Policy/CoreStrategy/CoreStrategyLibrary/Planning\\_Evidence\\_Base\\_Habitat\\_Regulations\\_Assessment.aspx](http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/CoreStrategy/CoreStrategyLibrary/Planning_Evidence_Base_Habitat_Regulations_Assessment.aspx)

AGENDA ITEM	ACTION
<p>required. The group agreed that this had to be very high level and not set out any detail.</p>	
<p><b>20. Transport modelling and in combination assessments (JH)</b></p> <ul style="list-style-type: none"> <li>• MSDC is updating their District Plan HRA following their Local Plan Hearings. MSDC is using the WSCC County Highways Model. The model takes account of background growth and growth in surrounding areas, using the National Trip End Model (NTEM) and TEMPRO assumptions. Amey are the consultants and JH will ask if data can be shared.</li> <li>• Discussion on the correct figures to use, i.e. 876 or 1,090 dwellings for MSDC. The Inspector verbally agreed at the Hearings that there are grounds for adoption of the District Plan at 876 dwellings per year to 2023/24 and then a figure of 1,090 dwellings per year thereafter subject to the Habitats Regulations Assessment.</li> <li>• It was agreed that we should agree all our housing figures to be used in our transport models in the statement of common ground.</li> <li>• Discussion on TEMPro. This includes allocations and permissions but there is a gap 2014-2017. All authorities present are using TEMPro in their modelling work.</li> <li>• Discussion on future NOx reductions. WDC are using figures different to Defra.</li> </ul>	<ul style="list-style-type: none"> <li>• JH to query sharing traffic data with Amey</li> </ul>
<p><b>21. Brief updates with Local Plans and HRAs</b></p> <ul style="list-style-type: none"> <li>• Covered elsewhere in meeting.</li> </ul>	
<p><b>22. A statement of common ground (SCG) on Ashdown Forest (LH)</b></p> <ul style="list-style-type: none"> <li>• We all need to meet the Duty to Cooperate and engage constructively, actively and on an ongoing basis on strategic cross boundary issues. The officer working group is a good starting point and a SCG on Ashdown Forest would help to formalise and drive the work forward.</li> <li>• LDC directors met with PAS who offered to work with the group on the statement. TT will progress with PAS.</li> <li>• TWBC have drafted a bilateral statement between themselves and WDC and are awaiting WDC response. DS agreed to share with group.</li> </ul> <p>The following was agreed by the group:</p> <ul style="list-style-type: none"> <li>• To be completed and agreed by January 2018</li> <li>• It would set out matters that the group agreed and didn't agree on.</li> <li>• It would cover air quality matters only and not other matters such as recreational pressure</li> <li>• It would relate only to Ashdown Forest but there was the potential to replicate it for other international designations</li> <li>• It would agree the methodology assumptions for transport and air quality</li> <li>• It would agree housing numbers for all the LPAs to be used for traffic modelling</li> <li>• It would agree to share evidence and findings</li> </ul>	<ul style="list-style-type: none"> <li>• TT to contact PAS and invite to October meeting and find out level of support available</li> <li>• DS to circulate draft statement of common ground</li> <li>• NE to consider being a signatory</li> </ul>

AGENDA ITEM	ACTION
<ul style="list-style-type: none"> <li>• It would explain the role of the officer working group</li> <li>• It would cover planning policy and not planning applications. Neighbourhood plans would be covered under planning policy</li> <li>• NE to consider whether it should be a signatory. The feeling of the group was that NE is a very necessary partner to the statement</li> <li>• All LPAs present happy to progress and be signatory subject to content</li> </ul>	
<p><b>23. Update from Natural England (MA)</b></p> <ul style="list-style-type: none"> <li>• MA explained to the group that the guidance on HRAs was for internal use at NE. The group discussed that there was general confusion on the matter both at a local and national level.</li> </ul>	
<p><b>24. Current approach to planning applications (DS)</b></p> <ul style="list-style-type: none"> <li>• TWBC has received an objection to a planning application from WDC and have sought legal advice.</li> <li>• No other LPAs have received any objections</li> <li>• WDC confirmed that they are scrutinising weekly lists and objecting if an HRA has not been done when there is a net increase in traffic.</li> <li>• MSDC is undertaking a HRA screening for planning applications</li> <li>• WDC has not determined any planning applications that would result in a net increase in traffic. No appeals have been lodged on non-determination.</li> </ul>	
<p><b>25. AOB</b></p> <ul style="list-style-type: none"> <li>• NH said that a developer, planning agent and landowner stakeholder forum has been set up for Ashdown Forest and that WDC has been invited to the next meeting in September.</li> <li>• Next working group meeting to be held on 9<sup>th</sup> or 13<sup>th</sup> October.</li> </ul>	<p>LH – arrange next meeting for 9<sup>th</sup> or 13<sup>th</sup> October.                      JH – arrange meeting room at MSDC offices in Haywards Heath.</p>

NOTES OF MEETING ASHDOWN FOREST 10:00 AM, 13<sup>th</sup> OCTOBER 2017 MID SUSSEX DISTRICT COUNCIL, HAYWARDS HEATH

Attendees:

- Marian Ashdown (MA) – Natural England (NE)
- Kelly Sharp (KSh) – Wealden District Council (WDC)
- Nigel Hannam (NH) – Wealden District Council
- Jennifer Hollingum (JH) – Mid Sussex District Council (MSDC)
- Lois Partridge (LP) – Mid Sussex District Council (MSDC)
- Lucy Howard (LH) – South Downs National Park Authority (SDNPA)
- Katharine Stuart (KSt) – South Downs National Park Authority
- Ellen Reith (ER) – East Sussex County Council (ESCC)

Edward Sheath (ES) – East Sussex County Council

David Scully (DS) – Tunbridge Wells Borough Council

Hannah Gooden (HG) – Sevenoaks District Council

Tondra Thom (TT) – Lewes and Eastbourne Councils

Roger Comerford (RC) – Tandridge District Council

Guy Parfect (GP) – West Sussex County Council

Jenny Knowles (JK) – Tonbridge and Malling Borough Council

Stephen Barker (SB) – Planning Advisory Service (PAS)

AGENDA ITEM	ACTION
<p><b>1. Introductions and minutes from last meeting (LH)</b></p> <ul style="list-style-type: none"> <li>• Group introduced themselves and welcomed new attendees.</li> <li>• Run through of actions from previous meeting:               <ul style="list-style-type: none"> <li>○ NH and ES: bid submitted by ESCC focussing on Hailsham linked to AF mitigation. Letter of support submitted. No response yet. ES will circulate documents. NH thanked group for support.</li> <li>○ Regarding HRA work undertaken by WDC, see below.</li> <li>○ RC queried if LPA contributions would be disaggregated. GP advises that this is problematic traffic may reroute differently.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• ES to circulate Expression of Interest documents to group</li> </ul>
<p><b>2. Wealden DC and Natural England to provide update on air quality and ecology monitoring (KS &amp; MA)</b></p> <ul style="list-style-type: none"> <li>• WDC have sent draft reports on Ashdown Forest SAC, Pevensey Levels SAC and Lewes Downs SAC to NE for their review.</li> <li>• These reports will be circulated to this officer group toward the end of week commencing 16th October 2017, and will be published on WDC website one week after circulation.</li> <li>• The work shared and published will be methodology and air quality work for Ashdown Forest – it will not include the ecology work as WDC have commissioned further work on this.</li> <li>• WDC has a DAS agreement with NE</li> <li>• NE will review the work produced by WDC and will include their in house air quality specialist.</li> <li>• KSh for WDC raised concerns regarding ammonia pollution arising from catalytic converters fitted to vehicles. MA notes that ammonia dissipates quickly.</li> </ul> <p>Discussion then began regarding Strategic Nitrogen Action Plans (SNAP):</p> <ul style="list-style-type: none"> <li>• MA confirmed that NE sees merit in a SNAP for Ashdown Forest. SNAP would reduce background nitrogen.</li> <li>• RC circulated a table of potential mitigation and solutions</li> </ul>	<ul style="list-style-type: none"> <li>• WDC to circulate reports to the officer group toward end of week commencing 16th October 2017.</li> <li>• LH to add SNAP to a future full officer group meeting (not SCG subgroup meeting).</li> <li>• MA to invite NE officer to SNAP meeting when date known.</li> <li>• MA to confirm that NE input into SNAP wouldn't be charged.</li> </ul>

<p>options, requesting that group members take shared ownership of this as a continuing ‘live’ piece of work, adding comments, updates and suggestions as they see fit. MA advise that the habitat management options would not be suitable as this would conflict with the reasons for the site designation. Other suggests could usefully feed into a SNAP. MA reiterated the key role of agriculture in the high background levels. To a lesser extent emissions from power stations on the continent also contribute. Noted that due to dispersal of pollution, Gatwick Airport was not a specific direct issue, rather a wider regional issue.</p> <ul style="list-style-type: none"> <li>• TT reiterated, and MA confirmed LPAs, take action based on their own relative contribution – process contribution.</li> <li>• Officer Group agrees to produce a SNAP. SNAP to be added to the agenda for a future meeting (full officer group meeting rather than SCG sub-group meetings).</li> <li>• Advisor for management of Ashdown Forest from NE to attend future SNAP meeting. Cath Jackson likely to not be</li> </ul>	
<p><b>3. Update on South Downs Local Plan, HRA and background paper (KSt)</b>  Local Plan update</p> <ul style="list-style-type: none"> <li>• Reg 19 Pre-Submission South Downs Local Plan consultation began on 26th September. It will run for 8 weeks until 21st November.</li> </ul> <p>HRA work</p> <ul style="list-style-type: none"> <li>• Air quality Appropriate Assessment work is set out in two sections: <ul style="list-style-type: none"> <li>o Ashdown Forest: commissioned jointly with LDC and the methodology and results are set out in an addendum at the back of the report.</li> <li>o Other designations in and round the National Park: methodology is set out in section 2.6 and the results discussed in section 5.3.</li> <li>o Link to HRA:  <a href="https://www.southdowns.gov.uk/wpcontent/uploads/2016/11/SDNPA-HabitatsRegulations-Assessment.pdf">https://www.southdowns.gov.uk/wpcontent/uploads/2016/11/SDNPA-HabitatsRegulations-Assessment.pdf</a></li> </ul> </li> <li>• Methodology: In-combination assessment undertaken using TEMPRO. Adjusted for the higher expected development likely to come forward in Local Plan around Ashdown Forest. Then air quality calculations for NOx and N were undertaken. Ecological interpretation was then done to establish the extent and significance of any changes expected. No thresholds (e.g. 1000 AADT) were used – all road links were subject to assessment at all stages.</li> <li>• Results: <ul style="list-style-type: none"> <li>o Traffic: 5 key links modelled. In-combination traffic increase on all links between c.950 and c.3000 AADT. LDC/SDNPA contribution small between 0 and 260 AADT.</li> <li>o Air Quality: Currently above critical level for NOx on 3 of the routes. All expected to reduce to below critical level over the plan period even with AADT increases expected. For N deposition, improvements in background more than offset the additional from car movements. On A26 and A275 the LDC/SDNPA contributions slow this slightly within the first 5m of the road by 0.01kgN/ha/yr.</li> </ul> </li> <li>• Conclusion re. Ashdown Forest: No adverse effect on integrity on the Ashdown Forest SAC alone or in combination with other plans and projects.</li> </ul>	<ul style="list-style-type: none"> <li>• KSt to circulate links (found in the minutes)</li> </ul>

<ul style="list-style-type: none"> <li>• Conclusion re. other designations: Same as above, but with a recommendation to monitor designations close to the A3 corridor, which brings in line with the approaches of other nearby Local Plans.</li> <li>• NH queried the reduction in background N deposition. KSt responded that a % assumption in N reduction is used based on guidance from Institute of Air Quality Management and DMRB. 2% is the DMRB recommendation. SDNP/LDC have taken a precautionary approach and applied 2% for the first half and no improvement for the last half of the plan period – averaging to 1%. Principle was agreed.</li> <li>• Biodiversity background paper published on SDNPA website.</li> </ul>	
<p>4. Update from Mid-Sussex on HRA (JH)</p> <ul style="list-style-type: none"> <li>• Agenda item not discussed.</li> </ul>	
<p>5. PAS support for the Statement of Common Ground (SCG) looking at (SB):</p> <ul style="list-style-type: none"> <li>• SB introduces SCG and role of PAS: <ul style="list-style-type: none"> <li>o Right Homes in the Right Places consultation introduces mandatory SCG</li> <li>o PAS and DCLG are keen to get some early learning on them</li> <li>o The purpose of SCG is to help the challenges around Duty to Co-operate – to make sure that opportunities to address matters prior to examination are taken and to clearly set out the key strategic cross boundary issues and actions to planning inspectors.</li> <li>o It is thought that SCG would consist of two parts: (1) geography and issues and (2) action plan</li> <li>o SCG would be a short document, signed by LPAs and other, and would generally need political sign off. It would be a living breathing document that would be updated whenever a signatory gets to a new stage in the plan making process.</li> <li>o SCG could be a helpful mechanism for unlocking infrastructure funding and other government funding.</li> <li>o PAS would like to work with 8 or so pilot groups to gather key learning ahead of the NPPF redraft – key window is next 9 weeks. NPPF draft is expected for a consultation (on wording rather than principles of content which were consulted upon over the last year or so) in January 2018 and final publish in March 2018.</li> <li>o In principle, DCLG would like preliminary SCG to be published by all authorities 6 months after publish of NPPF redraft (Sept 2018) and a full SCG 6 months after that (Mar 2019).</li> <li>o PAS can facilitate meetings and support write up of SCG.</li> </ul> </li> <li>• LH confirms interest of the group in becoming a PAS supported pilot, and confirms that the group are working toward completing a draft SCG for January.</li> </ul>	
<p>6. A Statement of Common Ground on Ashdown Forest: follow on discussion (LH)</p> <ul style="list-style-type: none"> <li>• Format of document: <ul style="list-style-type: none"> <li>o SB advises that, as currently set out, each authority is expected to produce one SCG which sets out the various strategic cross boundary issues and actions, and other LPAs and stakeholders are signatories to the relevant parts of the document e.g. meeting housing need would be one section of the SCG and members of the HMA would be signatories to that part.</li> <li>o The group discussed and considered that this approach wouldn't work due nature of the issue, the large number of signatories and the timetable needs of the officer group.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• All-Further work required to establish geographical scope and signatories</li> <li>• SB to provide risk register template to LH/KSt</li> <li>• SB to advise LH</li> </ul>

<p>o SB and group agree that the Ashdown Forest Officer group will produce an AF specific SCG which can be cross referred to in LPAs wider SCG.</p> <p>o Agreed that the SCG on AF itself will cover multiple issues and not everyone needs to sign up to everything. For example: MA says that NE will be a signatory but only to issues on which they have a view.</p> <ul style="list-style-type: none"> <li>• Geographical scope:</li> </ul> <p>o The group recognised that establishing the geographical scope of the SCG would be a key issue for determining signatories. What is the extent of influence to warrant being a signatory? The scale of each LPA's contribution (process contribution) to the issue will also be a relevant factor for determining signatories. This will require further work by the group.</p> <ul style="list-style-type: none"> <li>• A risk register will need to be produced. LH asks if SB can provide a template. SB agreed.</li> <li>• SB advises that there is no SCG template yet – the pilots will help in producing one which may be included within the redrafted NPPF.</li> <li>• PAS facilitator will not be SB – SBV to advise LH and TT of who they will be.</li> <li>• Way forward:</li> <li>• All-Further work required to establish geographical scope and signatories</li> <li>• SB to provide risk register template to LH/KSt</li> <li>• SB to advise LH and TT who the PAS facilitator will be</li> <li>• All to provide information on their LP timetable, sign off process and housing numbers.</li> <li>• LH to circulate meeting invites for 10<sup>th</sup> November and week commencing 20<sup>th</sup> November</li> </ul> <p>o A series of meetings will be scheduled to work on these issues and draft the SCG: (1) geographical scope, signatories, governance arrangements, risks, establishing what the other elements of the scope are (previously agreed as air quality matters, methodology assumptions, housing numbers, sharing evidence and policy not applications), LP timetables.</p> <p>(2) all day workshop on issues and actions. Further meetings will be required to be decided depending on outcomes of the above.</p> <p>o Meetings to be attended by a self-selected subgroup</p> <p>o SDNPA will provide administrative support for the group.</p> <p>o All will need to speak with members regarding sign off and provide info to the group on their sign off process.</p>	<p>and TT who the PAS facilitator will be</p> <ul style="list-style-type: none"> <li>• All to provide information on their LP timetable, sign off process and housing numbers.</li> <li>• LH to circulate meeting invites for 10<sup>th</sup> November and week commencing 20<sup>th</sup> November</li> </ul>
<p>7. Any other business (LH)</p> <ul style="list-style-type: none"> <li>• None.</li> </ul>	

**Attendees:**

Edward Purnell (EP) – Wood on behalf of Planning Advisory Service (PAS)

Marian Ashdown (MA) – Natural England (NE)

Kelly Sharp (KSh) – Wealden District Council (WDC)

Jennifer Hollingum (JH) – Mid Sussex District Council (MSDC)

Lucy Howard (LH) – South Downs National Park Authority (SDNPA)

Katharine Stuart (KSt) – South Downs National Park Authority

Hannah Gooden (HG) – Sevenoaks District Council

Tondra Thom (TT) – Lewes and Eastbourne Councils

Roger Comerford (RC) – Tandridge District Council

Guy Parfect (GP) – West Sussex County Council

Sharon Evans (SE) – Tunbridge Wells Borough Council (TWBC)

Michael Hancock?? (??) – Tunbridge Wells Borough Council (TWBC)

Apologies: Nigel Hannam (WDC), Marina Briggishaw (WDC), Ellen Reith (ESCC), Edward Sheath (ESCC), David Scully (TWBC), David Marlow (Rother District Council)

AGENDA ITEM	ACTION
<p><b>I. Minutes and actions from last meeting (LH)</b>                      All the actions arising from the meeting on 13<sup>th</sup> October had been actioned. LH questioned why WDC had redacted key parts of their Ashdown Forest SAC Air Quality Monitoring &amp; Modelling report. KSh confirmed that the redaction had been put in place to disguise the exact locations of the monitoring stations due to previous problems with vandalism, theft and sabotage. KSh confirmed that there was an exclusion under EIR regs to protect the ongoing study under public interest. LH confirmed that it was not possible for others to plug the information into their models without exact locations and again the unredacted information was requested by those using the AECOM model. KSh refused to share the data on the grounds detailed above. TT stressed the need to understand the abnormally high NOx figures in the WDC study. TT suggested we seek advice on how the data could be shared with other authorities without being subject to EIR requests and asked if WDC would consider any potential solutions to data sharing put forward by the group. KSh agreed WDC could consider data sharing proposals put forward. LH also requested WDC provided year 1 and 2 measurements separately. It was noted that NE had seen an early draft of the Air Quality and Ecology Monitoring Report . There was a brief discussion on the risk register.</p>	<ul style="list-style-type: none"> <li>• KSh to send link to years 1 and 2 monitoring data</li> <li>• All to investigate sharing of information</li> <li>• EP to send risk register for SoCG</li> </ul>



<p>RC noted that TDC were in the process of appointing Aecom to undertake traffic, air and ecological modelling, but the redactions in place meant it would be difficult to utilise the WDC data.</p>	
<p><b>2. Introductions and reasons for the meeting</b>                  EP explained that the role of PAS was to provide skeletal but not detailed drafting of the SoCG. The SoCG was a mechanism for demonstrating Duty to Cooperate. The SoCG will not go into technical detail.</p>	
<p><b>3. Roles and responsibilities for the SoCG</b>                  LH confirmed that the SDNPA will draft the SoCG.</p>	
<p><b>4. Geographical scope of the SoCG</b>                  There was a discussion on the initial geographic approach relating to the 7km zone of influence for recreational disturbance for the SPA and then modified by journeys to work. It was noted that the 7km zone is not directly relevant to the SAC. However, due to the complexity of this work and the need to make progress it was decided by all that instead of 'geographic scope' the SoCG would refer to the 'geographical area defined by the membership of the Ashdown Forest Working Group.' The following authorities were defined as members and it was agreed to contact Crawley and Brighton &amp; Hove again about membership.</p> <ul style="list-style-type: none"> <li>• South Downs National Park Authority</li> <li>• Lewes District Council</li> <li>• Wealden District Council</li> <li>• Eastbourne Borough Council</li> <li>• Rother District Council</li> <li>• Tunbridge Wells Borough Council</li> <li>• Sevenoaks District Council</li> <li>• Tandridge District Council</li> <li>• Mid Sussex District Council</li> <li>• Crawley Borough Council</li> <li>• Brighton &amp; Hove Council</li> <li>• East Sussex County Council</li> <li>• West Sussex County Council</li> </ul> <p>It was discussed that the geographic areas having a bearing on Ashdown Forest air quality may in practice bisect individual lpa boundaries.</p> <p>KSh confirmed that WDC had received their transport model for Ashdown Forest this week.</p> <p>RC raised the option of widening the scope of the SoCG to encompass all Ashdown Forest issues (i.e. also including issues related to the SPA and recreational impacts). The Group decided to continue with current scope focusing solely on air quality.</p>	<ul style="list-style-type: none"> <li>• JH to contact Crawley BC about membership</li> <li>• LH to contact B&amp;H CC about membership of group</li> </ul>
<p><b>5. Other elements of scope</b>  <b>(a) Local Plan Housing numbers</b></p>	<ul style="list-style-type: none"> <li>• KSt to re-circulate Housing Figures</li> </ul>

<p>Most of this table had already been completed. Awaiting figures from Crawley, TWBC, T&amp;MBC and Brighton &amp; Hove if they choose to join the group. Figures for those districts partly covered by the National Park needed to be disaggregated for inside/outside the National Park to prevent double counting. The figures would then be agreed on 23<sup>rd</sup> November and frozen for a set period yet to be determined.</p>	<p>table for all to complete by 20-11-17</p> <ul style="list-style-type: none"> <li>• KSt to disaggregate housing figures in regard to the National Park and circulate by 20-11-17</li> </ul>
<p><b>5. Other elements of scope</b>  <b>(b) Methodology assumption headlines</b>          It was agreed that there are 3 groups of assumptions each of which was discussed as follows:</p> <p><b>(i) Transport modelling</b>          Three different models had been used by the group namely West Sussex model used by MSDC, the Wealden model used by WDC and the AECOM model used by everyone else. The key differences between them were:</p> <ul style="list-style-type: none"> <li>• What the model deals with e.g. residential, employment, visitors</li> <li>• Background future forecasting e.g. 2009/2014</li> <li>• Input e.g. geographical unit such as Census super output area</li> <li>• Origin/destination zones</li> <li>• Outputs e.g. AADT</li> <li>• Roads</li> <li>• Other SACs</li> <li>• Model structure e.g. growth factors and base year</li> <li>• Input data e.g. Census and TRICs</li> <li>• Use of OAN or plan-based figures for neighbouring Ipas 'in-combination' housing number.</li> </ul> <p>GP to draft the headings of a table and circulate for all to complete.</p> <p><b>(ii) Air quality calculations</b>          The principles of the following topics were discussed:</p> <ul style="list-style-type: none"> <li>• Chemicals monitored</li> <li>• Forecasting assumptions for methodology</li> </ul> <p>Circulation of another table was discussed. It was agreed however, that all parties would look into their own air quality calculations methodology for a discussion at the workshop.</p> <p><b>(iii) Ecological interpretation</b>          It was decided that there should be a discussion but not a table on ecological interpretation focusing on the following:</p> <ul style="list-style-type: none"> <li>• 1% contribution process</li> <li>• Key HRA regs arguments</li> </ul>	<ul style="list-style-type: none"> <li>• GP to draft and circulate table of transport modelling by 15-11-17 and all to complete and return to KSt by 20-11-17</li> </ul>

<p>There was discussion about mitigation and whether it should be addressed in the SoCG. It was agreed that it shouldn't but should be discussed by the group in the New Year once the SoCG was finalised.</p> <p>RC requested that consideration of potential mitigation and compensation be included in the scope of the SoCG. TT noted that evidence does not exist to justify the need for compensation. The consensus was to not include this on the basis that it is a later HRA stage and would not necessarily be required. RC felt it should be covered as there is a risk that it may be required and we needed to be prepared for this eventuality. Alternatively, RC requested that the SoCG could at least include a statement to the effect that the Group agreed to work in partnership on mitigation/compensation in the event of such measures proving necessary. It was agreed that the group would look at Strategic Nitrogen Action Plans (SNAP) after the completion of the SoCG.</p>	
<p><b>6. Local Plan timetables</b> Table to be completed by all.</p>	<ul style="list-style-type: none"> <li>• All to complete table and return to KSt by 20-11-17</li> </ul>
<p><b>7. Sign off arrangements and timelines for SoCG</b> Table to be completed by all.</p>	<ul style="list-style-type: none"> <li>• All to complete table and return to KSt by 20-11-17</li> </ul>
<p><b>8. Planning for our workshop on 23rd November</b> The workshop is expected to last approximately 6 hours. It was agreed that by the end of the workshop we needed enough information to draft the SoCG. NE will only be able to attend part of the workshop and it was thought most useful if this was the second half. The agenda would follow the same broad headings of today's meeting.</p> <p>There was a discussion about whether expert consultants should be allowed to attend the workshop. Their role would be to draw out the differences between the different assumptions but not the credence of the different models. EP to ask PAS whether James Riley's (SDNP, TWBC and LDC's HRA Consultant) attendance would be appropriate bearing in mind that WDC and MSDC Consultants are unlikely to be able to attend. EP/PAS to report back to the group with recommendations. All to ascertain availability of consultants for workshop.</p> <p>It was clarified that even if consultants were unable to attend, there would be an opportunity for the draft SoCG to be circulated to them post-workshop.</p>	<ul style="list-style-type: none"> <li>• LH to circulate draft agenda 20-11-17</li> <li>• EP to confirm with group whether it is appropriate or not for a Consultant(s) to attend next SoCC workshop.</li> <li>• All to confirm whether consultant(s) are available, as appropriate.</li> </ul>
<p><b>9. AOB</b> None</p>	

**Post meeting notes:**

- Tonbridge & Malling Borough Council have requested not to appear in the Statement of Common Ground on the advice given by Natural England on 13<sup>th</sup> October.
- The membership of East and West Sussex County Councils is to be discussed at the next meeting of the group.

NOTES OF MEETING ASHDOWN FOREST SAC WORKSHOP 10:00 AM, 23<sup>rd</sup> NOVEMBER 2017  
MID SUSSEX DISTRICT COUNCIL, HAYWARDS HEATH

**Attendees:**

Edward Purnell (EP) – Wood on behalf of Planning Advisory Service (PAS)

Marian Ashdown (MA) – Natural England (NE)

Kelly Sharp (KSh) – Wealden District Council (WDC)

Marina Briggishaw (MB) – Wealden District Council

Jennifer Hollingum (JH) – Mid Sussex District Council (MSDC)

Lucy Howard (LH) – South Downs National Park Authority (SDNPA)

Katharine Stuart (KSt) – South Downs National Park Authority

Hannah Gooden (HG) – Sevenoaks District Council

Tondra Thom (TT) – Lewes and Eastbourne Councils

Roger Comerford (RC) – Tandridge District Council

Guy Parfect (GP) – West Sussex County Council

Sharon Evans (SE) – Tunbridge Wells Borough Council (TWBC)

David Scully (DS) – Tunbridge Wells Borough Council

Michael Hammacott (MH) – Tunbridge Wells Borough Council (TWBC)

David Marlow (DM) – Rother District Council (RDC)

Jenny Knowles (JK) – Tonbridge and Malling Borough Council (T&MBC)

Apologies: Nigel Hannam (WDC), Ellen Reith (ESCC), Pat Randall (ESCC), Edward Sheath (ESCC), Tom Nutt (Crawley)

<b>AGENDA ITEM</b>	<b>ACTION</b>
<b>I. Introductions and minutes from last meeting (LH)</b>	<ul style="list-style-type: none"><li>• LH to request data from WDC</li></ul>

<ul style="list-style-type: none"> <li>• Group went through the minutes and then actions from the previous meeting, discussing the amendments received by email prior to the meeting. A number of changes to the minutes were discussed and the final minutes were agreed by all. Further actions were also identified.</li> <li>• LH asked for a link to the separate Year 1 and Year 2 monitoring data to be circulated. KSh advised that only Year 1 was published in a standalone report and suggested we set out exactly what we are seeking in a question to be sent direct.</li> <li>• TT asked again for the redacted air quality monitoring locations, suggesting that the data could be shared consultant to consultant which would be exempt for EIR. KSh advised that when consultants hold information used for a public body, they are in effect equivalent to ‘an arm’ of the authority and would be subject to the same EIR risks.</li> <li>• WDC advised that they have instructed counsel on a number of Ashdown Forest/HRA related issues, including the request for the redacted air quality monitoring locations and the forthcoming SCG.</li> <li>• Feedback from Crawley BC was that they did want to join the group but could not attend today’s meeting.</li> <li>• Feedback from Brighton &amp; Hove CC was that they did not currently want to join the group but would like to be kept up to date on progress.</li> <li>• EP reiterated the role of PAS as a facilitator to support the preparation of the SoCG which will:             <ul style="list-style-type: none"> <li>○ assist in demonstrating that parties have co-operated;</li> <li>○ draw out any differences and identify what may need to be done to resolve those differences</li> <li>○ be concise and non-technical</li> </ul> </li> </ul>	<p>in line with email from AECOM.</p> <ul style="list-style-type: none"> <li>• KSt to make agreed changes to minutes and circulate finalised version.</li> </ul>
<p><b>2. Sign off arrangements (table) (KSt)</b></p> <ul style="list-style-type: none"> <li>• KSt outlined the table and noted that there were unlikely to be showstoppers for signoff by March.</li> <li>• RDC noted that they have provided two scenarios for sign off options depending on the content of the SoCG.</li> <li>• Queries arose regarding which authorities would be signatories. These are addressed under item 4 of the agenda.</li> </ul>	<ul style="list-style-type: none"> <li>• All to advise Chair (LH) of any changes in expected sign off process.</li> </ul>
<p><b>3. Local Plan housing numbers (table) (KSt)</b></p> <p>It was discussed whether housing numbers could be agreed, how long they might be frozen for and how these numbers should be used in modelling. It was agreed:</p> <ul style="list-style-type: none"> <li>• The position at the last meeting was confirmed: any agreement around housing numbers would be just applicable to future modelling runs rather than retrospectively re-running models.</li> </ul>	<ul style="list-style-type: none"> <li>• KSt, in due course, to update table with disaggregated housing figures for the National Park following discussion with</li> </ul>

<ul style="list-style-type: none"> <li>• Numbers would always be changing and any agreement would be a snapshot of the numbers as they stand upon signing the SoCG.</li> <li>• Housing numbers would be a standing item on the agenda for the Working Group going forward to update at key stages in plan making.</li> <li>• Each LPA to confirm housing numbers with individual authorities before running models.</li> <li>• A general principle in the agreement of housing numbers as follows:             <ul style="list-style-type: none"> <li>○ If a LP is less than 5 years old use the adopted figure</li> <li>○ If an emerging LP is nearing pre-submission and the LPA is confident then use the emerging figure</li> <li>○ If the adopted LP is over 5 years old and an emerging plan has not progressed use the OAN/standard methodology (once confirmed by CLG) unless otherwise evidenced.</li> </ul> </li> </ul> <p>The group went through the table and indicated the preferred current housing figure to use.</p>	<p>respective authorities.</p> <ul style="list-style-type: none"> <li>• KSt to compile housing table for the SoCG with the housing figures to use for each authority highlighted in bold</li> <li>• LH to add housing numbers as a standing item to future agendas.</li> </ul>
<p><b>4. Geographical area defined by the membership of the Working Group (KSt)</b></p> <p>It was agreed at the previous SoCG meeting that signatories of the SoCG would be self-selecting and broadly make up the membership of the Working Group.</p> <p>At this workshop it was agreed:</p> <ul style="list-style-type: none"> <li>• Tonbridge and Malling Borough Council would be removed from the signatories list on the basis of advice from Natural England that they did not foresee TMBC being involved in the SoCG. T&amp;MBC would like to continue to be part of the group to observe.</li> <li>• Add Crawley BC</li> <li>• Remove Brighton and Hove CC</li> <li>• Rother included on a precautionary basis</li> <li>• West and East Sussex County Councils to be added</li> <li>• Surrey CC and Kent CC would be added to the circulation list for information, but would not be signatories.</li> <li>• Membership of the group and signatories may change based on emerging evidence</li> <li>• The list of signatories was confirmed as:             <ul style="list-style-type: none"> <li>○ South Downs National Park Authority</li> <li>○ Lewes District Council</li> <li>○ Wealden District Council</li> <li>○ Eastbourne Borough Council</li> <li>○ Rother District Council</li> <li>○ Tunbridge Wells Borough Council</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• KSt to contact Crawley to add their data to the tables.</li> </ul>

<ul style="list-style-type: none"> <li>○ Sevenoaks District Council</li> <li>○ Tandridge District Council</li> <li>○ Mid Sussex District Council</li> <li>○ Crawley Borough Council</li> <li>○ East Sussex County Council</li> <li>○ West Sussex County Council</li> </ul>	
<p><b>5. Transport modelling (table) (KSt &amp; GP)</b></p> <ul style="list-style-type: none"> <li>● It was agreed that the table did not cover all elements required. It was agreed: <ul style="list-style-type: none"> <li>○ GP to rework the table and recirculate to the Working Group, providing guidance on how to complete the table. The table will be circulated on Monday 27<sup>th</sup> November.</li> <li>○ Authorities will complete the table and return to GP by Monday 4<sup>th</sup> December.</li> <li>○ GP will analyse the table and identify commonalities, minor differences and major differences. These will be colour coded.</li> <li>○ GP will circulate this analysis for comment on Monday 11<sup>th</sup> December.</li> <li>○ The table will need to be finalised by the end of December,</li> <li>○ GP to provide narrative to the table to go into SOCG</li> </ul> </li> <li>● It was agreed that the table would provide a snapshot of some of the main differences/similarities and to get the full methodology for looking properly at the models.</li> <li>● The possibility of agreeing common elements of transport modelling for future work was discussed but not agreed at this time.</li> <li>● This topic would just deal with transport modelling drawing out the commonalities, major differences and minor differences.</li> <li>● The use of models and proportionality was raised by TT with regard to the differing scale of additional AADT. Matter discussed further under agenda item 6.</li> </ul>	<ul style="list-style-type: none"> <li>● GP will rework the table and circulate to the Working Group on Monday 27<sup>th</sup> November,</li> <li>● Authorities will complete the table and return to GP by 4<sup>th</sup> December.</li> <li>● GP will undertake analysis of the table and will circulate on Monday 11<sup>th</sup> December.</li> </ul>
<p><b>10. Risk Register (EP)</b></p> <p>An example risk register was circulated by PAS for consideration. The Working Group agreed that it didn't add value to the SoCG process and that the risk register related more to the preparation of individual local plans. It was agreed that the Working Group may wish to revisit the idea of a risk register once the SoCG is drafted.</p>	
<p><b>6. Proportionality (TT)</b></p>	<ul style="list-style-type: none"> <li>● WDC to provide the reasons and explanation for</li> </ul>

<p>TT introduced this item- there is no universal standard on proportionality and the issue relates to what is the ‘appropriate’ level of assessment required for LPs? Where effects are demonstrably small can the level of assessment be justifiably less complex than WDC’s bespoke approach? TT queried what justification there is for objections from WDC to accepted industry standard methodology being used by those authorities where their evidenced contribution to any potential impact is proportionally, substantially smaller. The inference from the Habitats Regulations and government guidance is that the assessment should be proportionate to the likely scale of impact. LH pointed out that the NPPF states that Local Plan evidence should be proportionate. Objections to industry standard robustly carried out assessments may unnecessarily frustrate plan-making therefore TT posed agreement for the accepted industry standard methodology. Initial responses:</p> <ul style="list-style-type: none"> <li>• SDNPA: agree</li> <li>• TWBC: agree</li> <li>• LDC: agree</li> <li>• EBC: agree</li> <li>• WDC: does not agree and will not move on the standard methodology on the basis of work already undertaken. WDC contend that the standard methodology does not meet the requirements of the Ashdown Forest context. This work was undertaken in response to the Wealden Core Strategy EiP. WDC have used the Mott Macdonald methodology as amended.</li> <li>• NE: agree with TT with regard to proportionality. Polluter pays. NE not objecting to the use of the standard methodology.</li> <li>• WDC say that the APIS calculation are slightly wrong with regard to deposition. WDC use a finer grained 2m<sup>2</sup> rather than 5km<sup>2</sup>.</li> <li>• TWBC: standard methodology and result are not wrong, WDC grid squares just more refined. Justifiable to use best practice unless a clear reason not to do so.</li> <li>• TWBC asked WDC to confirm the reasons for taking such a pessimistic approach within their methodology and the absence of any allowance of background improvements to air quality. WDC replied that this approach was justified by the application of the precautionary principle.</li> <li>• WDC advise they will get legal advice regarding proportionality and will run their data through the standard methodology and make available. WDC advise their air quality experts will be busy until Christmas.</li> </ul> <p>Rother and Tandridge reserved their position. All others generally agree to use standard methodology except WDC. Ask that WDC</p>	<p>methodology deviation to go into the SoCG.</p>
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<p>provide the reasons and explanation for deviation to go into the SoCG.</p>	
<p><b>7. Air quality calculations</b>          The following points were briefly discussed:</p> <ul style="list-style-type: none"> <li>• WDC also assess non-standard ammonia and the 24-hr NOx mean.</li> <li>• MA – new cars don't emit as much ammonia – specific type of catalytic converter</li> <li>• WDC air quality report recognised both positive and negative limitations</li> <li>• WDC – ammonia and NOx interact in the atmosphere and this impacts N deposition.</li> <li>• NE will be signatory on air quality/ecological interpretation elements but not on housing numbers or traffic modelling parts of the SoCG</li> <li>• It was agreed that the standard responses on all the items on the SoCG were Agree, Disagree, or No position.</li> </ul> <p>It was agreed that a table would be helpful for this. KSt to prepare a table based around key headings below and circulate on Monday 27<sup>th</sup> November. Working group to provide their responses by 11<sup>th</sup> December.</p> <ul style="list-style-type: none"> <li>• Chemicals monitored and assessed in forecasting</li> <li>• Conversion ratios from NOx to N</li> <li>• Background improvement assumptions</li> <li>• Rate of dispersal from the centre line of the road up to 200m</li> <li>• Type of habitat included in the assessment – e.g. woodland in roadside vegetation.</li> </ul> <p>There may be other aspects of the methodology others may wish to note.</p>	<ul style="list-style-type: none"> <li>• KSt to prepare a table based around key headings below and circulate on Monday 27<sup>th</sup> November. Working group to provide their responses by 11<sup>th</sup> December.</li> <li>• KSt will send to AECOM for help in completing on behalf of all authorities using the AECOM model approach/standard methodology.</li> </ul>
<p><b>8. Ecological interpretation</b>          Three items were put forward for discussion:</p> <ol style="list-style-type: none"> <li>(1) 1% process contribution</li> <li>(2) Additional harm above the critical load/level</li> <li>(3) Type of habitat included in the assessment – e.g. woodland in roadside vegetation.</li> </ol> <p>(1) NE advise: 1% or more process contribution triggers Appropriate Assessment as there is considered to be a likely significant effect. The threshold is not arbitrary and is based on robust science – process contributions below 1% cannot be properly modelled and changes in air quality cannot be seen in the ecology at these levels. Above 1% does not mean an adverse impact but should check through AA process.</p>	<ul style="list-style-type: none"> <li>• KSt to add topic into the SoCG as something that may need to be addressed in the future.</li> </ul>

<p>All use or are likely to use except WDC who have not drawn a conclusions on this matter but will consider.</p> <p>(2) NE: look at sensitivity of impact. Dose response is curvilinear. Key thing is loss of species richness in heathland.</p> <p>(3) Covered in agenda item above.</p> <p>Overall, NE advise that it is too soon for the authorities in the Working Group to consider ecological interpretation as there is currently no evidence (for example through AA) published which says that such measures are required. The Mid Sussex and AECOM HRA screening for LSE work touches on ecological interpretation but this is beyond requirement for LSE screening.</p> <p>All agreed this was a topic that would go into the SoCG but as something that may need to be addressed in the future.</p>	
<p><b>9. Site Nitrogen Action Plan (SNAP)</b>          Phrasing and nature of the approach was discussed.          All agreed that paragraph 4.2.8 of the LDC/SDNPA HRA addendum will be included in the draft SoCG for consideration.</p> <p>Noted that a SNAP is not mitigation or compensation as there is not enough measurable certainly of the results. But may include some elements of mitigation. One of the ‘soft measures’ to address background levels from a range of sources. NE would lead on a SNAP working with other partners.</p>	<ul style="list-style-type: none"> <li>• KSt to include paragraph 4.2.8 of the LDC/SDNPA HRA in the draft SoCG for consideration</li> </ul>
<p><b>10. Actions and timetable going forward</b></p> <ul style="list-style-type: none"> <li>• LH read out list of actions to the Working Group</li> <li>• When comment on or signing the SoCG as ‘disagree’ it is incumbent upon that party to say why, but be concise.</li> <li>• Noted that CIEEM are undertaking an internal consultation for members only on new air quality methodology guidance.</li> <li>• KSh recommended a style of table for setting out comments on the draft SoCG – KSh to email to LH/KSt</li> <li>• Agreed to meet in mid-January to discuss the draft SoCG</li> </ul>	<ul style="list-style-type: none"> <li>• KSh recommended a style of table for setting out comments on the draft SoCG – KSh to email to LH/KSt</li> <li>• LH/KSt to circulate a draft SoCG by mid-December for the group to review.</li> <li>• LH/JH to arrange meeting in mid-January.</li> </ul>

## Ashdown Forest SAC Statement of Common Ground Workshop

10:00 am Thursday 18 January 2018

Mid Sussex District Council Offices, Haywards Heath

### PLEASE NOTE THESE MEETING NOTES ARE DRAFT

#### Attendees:

Edward Purnell (EP)– on behalf of the Planning Advisory Service (PAS)

Lucy Howard (LH) – South Downs National Park Authority (SDNPA)

Kate Stuart (KSt) - South Downs National Park Authority (SDNPA)

Jennifer Hollingum (JH) - Mid Sussex District Council (MSDC)

Marian Ashdown (MA) – Natural England (NE)

Marina Briggingshaw (MB) – Wealden District Council (WDC)

Kelly Sharp (KSh) – Wealden District Council (WDC)

Tondra Thom (TT) – Lewes and Eastbourne Councils (LDC)

Aiden Thatcher (AT) – Lewes and Eastbourne Councils (LDC)

David Scully (DS) – Tunbridge Wells Borough Council (TWBC)

Sharon Evans (SE) - Tunbridge Wells Borough Council (TWBC)

Edward Sheath (ES) – East Sussex County Council (ESCC)

Roger Comerford (RC) – Tandridge District Council (TDC)

Guy Parfect (GP) – West Sussex County Council (WSCC)

David Marlow (DM) – Rother District Council (RDC)

Tom Nutt (TN) – Crawley District Council (CDC)

Helen French (HF) – Sevenoaks District Council (SDC)

Mark McLaughlin (MM) – Horsham District Council (HDC)

Agenda Item	Actions
1. Introductions and reasons for meeting: <ul style="list-style-type: none"><li>• EP commends all for getting to this point in process and said the SoCG was a clear demonstration of the group's efforts to meet the Duty to Cooperate.</li><li>• Advises that extra level of detail is required for arguments agreeing as well as disagreeing key matters.</li><li>• The SoCG is intended for a Planning Inspector to pick up and understand the issues.</li></ul>	None
2. Minutes from last meeting <ul style="list-style-type: none"><li>• Proposed amendments from TWBC agreed.</li><li>• All actions identified had been actioned other than 'WDC to provide the reasons and explanation for methodology deviation.'</li></ul>	LH/MB/KS to follow up deviation from standard methodology

<p>3. Focused discussion on the following proposed changes to the SoCG</p>	<p>(a.) Summary of the High Court judgement, pages 4-5 (Tandridge District Council). Tandridge District Council suggest in their comments that this summary should be removed.</p> <ul style="list-style-type: none"> <li>• Agree to delete majority of this section, retaining paragraph 1.8</li> </ul>	<ul style="list-style-type: none"> <li>• KS to make changes to the draft SoCG as agreed in the meeting and recirculate on approximately 26<sup>th</sup> January – members of the group to then feed back.</li> <li>• MA will let the group know a rough date when internal guidance may be shared with LPAs.</li> <li>• MA to provide some revised wording for ‘Types of habitat to be included in the assessment’ section.</li> </ul>
	<p>(b.) The use of agreed housing numbers in future model reruns, page 6, paragraph 2.3 (Wealden District Council). The text currently says that the agreed numbers would not involve retrospectively re-running models. Wealden District Council propose to add ‘for adopted local plans’.</p> <ul style="list-style-type: none"> <li>• General disagreement with the proposed change from WDC. KS to add WDC disagree to the relevant table and WDC to provide reasons when next draft circulated.</li> </ul>	
	<p>(c.) Geographical coverage for transport modelling, pages 6-7</p> <ul style="list-style-type: none"> <li>• NE noted that it has been asked if internal guidance may be shared with LPAs in due course and MA will let the group know a rough date when available.</li> </ul> <p>(i.) Lewes District Council comment that this section should be deleted as the geographical coverage for in combination is a matter for each local authority to justify. (Lewes District Council)</p> <ul style="list-style-type: none"> <li>• Agreed that geographical coverage within modelling work should be determined by each LPA and the following text reflecting this is to replace current wording in this section. ‘It has been agreed that it is a matter for each LPA to determine the geographical coverage of their traffic modelling.’ Table to be deleted.</li> </ul> <p>(ii.) Wealden District Council comment that modelling should include, but not be limited to the proposals from the authorities listed (Wealden District Council).</p> <ul style="list-style-type: none"> <li>• Agreed that this item no longer needed to be discussed as superseded by agreed changes above.</li> </ul>	
	<p>(d.) Roads to be included in modelling of Ashdown Forest, page 7 (West Sussex County Council) West Sussex County Council propose additional wording regarding modelling of B roads and minor roads.</p> <ul style="list-style-type: none"> <li>• Change agreed</li> </ul>	
	<p>(e.) Types of habitat to be included in the assessment, page 11 (Natural England) Natural England comment that they disagree with the approach set out in the SoCG.</p> <ul style="list-style-type: none"> <li>• Agreed that MA would provide some amended text and KSt to remove from ‘not agree’ column.</li> </ul>	
	<p>(f.) Precautionary principle, page 14 (Wealden District Council). Wealden District Council propose additional wording including the phrase <i>guarantee</i> no reasonable doubt.</p> <ul style="list-style-type: none"> <li>• MA disagrees with WDC’s wording but MB said that it was wording from their barrister</li> </ul>	
	<p>General item 3 comments:</p>	

	<ul style="list-style-type: none"> <li>• Every signatory to give their position in each table</li> <li>• Additional column titled 'reserve judgement' to be added</li> <li>• Space added for explanations on each position</li> </ul>	
<p>4. Letters of objection to various planning applications by Wealden DC</p>	<ul style="list-style-type: none"> <li>• MB outlines the broad content of the letter and advises the letter is authored by the development management part of WDC. The letters are broadly the same with the last part of the letter tailored to each authority.</li> <li>• Purpose of the letters was to raise the need to undertake HRA</li> <li>• Tandridge District Council has received 11 objections, 3 of which relate to sites North of the M25</li> <li>• Separate meeting is offered by WDC</li> <li>• The problem of separate letters coming from the policy and DM parts of WDC is raised and noted. Group say that a joint policy and DM response from WDC would be helpful.</li> <li>• Issue raised by affected LPAs that these letters have come forward with no discussion/prior warning and this has caused consternation amongst members and officers.</li> <li>• Some of the queries raised include:             <ul style="list-style-type: none"> <li>○ How will WDC pursue the letter?</li> <li>○ Why have these applications been chosen to receive the letter? Criteria for selecting applications which would receive the letter.</li> <li>○ Are HRAs being objected to?</li> <li>○ Clarification on the differences of the final paragraphs of each letter</li> <li>○ Clarification of the approach with adopted and emerging plans.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• MB to take questions from the group and discuss with Nigel Hannam</li> <li>• WDC will provide clarification to the group's questions by the 26th January in the form of a letter or statement</li> <li>• WDC to provide suggested dates for a meeting in early Feb to discuss the planning application objection letters.</li> </ul>
<p>5. The timetable for the way forward with the SCG</p>	<ul style="list-style-type: none"> <li>• Recognise that there is not a lot of time before the SoCG is needed in mid-March. Dates were discussed and agreed.</li> <li>• Wording of section 3 'actions going forward' was discussed. It was agreed that it is important for the group to determine a way forward which all can sign up to. KS to rework this section to reflect discussion.</li> </ul>	<ul style="list-style-type: none"> <li>• Version 1 to circulate on approx. 26<sup>th</sup> Jan for people to state their position and provide explanations</li> <li>• Version 2 circulated approximately 9<sup>th</sup> Feb for final review and minor tweaks to position</li> <li>• Signatory version circulated approximately 16<sup>th</sup> Feb to be signed off by all by mid-March.</li> <li>• KS to reword section 3 to reflect discussion</li> </ul>
<p>6. AOB</p>	<ul style="list-style-type: none"> <li>• Mitigation discussed as raised by RC:</li> </ul>	<ul style="list-style-type: none"> <li>• KS to make changes as agreed</li> </ul>

<ul style="list-style-type: none"><li>○ Agreed that phrasing of 'mitigation/compensation' should be changed on the basis that these two are very different.</li><li>○ Discussed SNAP (and associated mitigation table) and agreed that it should be reflected in actions going forward</li><li>● Appendix 5 transport modelling table raised by GP. Agreed that a table with less detail would be more appropriate, focusing on GP analysis.</li></ul>	<ul style="list-style-type: none"><li>● GP to provide KS with revised Appendix 5 transport modelling table</li></ul>
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## Appendix 4 – Housing numbers

This table sets out the various housing numbers approaches for each local planning authority. The numbers in **bold** are those which have been agreed by the Ashdown Forest Working Group at the time of drafting this Statement of Common Ground following the methodology outlined in section 2 of the Statement.

Authority Name	Adopted Local Plan housing number	OAN	DCLG new methodology	Numbers used for own LP (and in any modelling work undertaken so far if different)	Numbers used for other LPAs in modelling work	HMA figure
Crawley Borough Council	5,100 dwellings total <b>340</b> dwellings per annum annualised average	675 dwellings per annum	476 dwellings per annum			Northern West Sussex HMA: as for Mid Sussex District Council below
East Sussex County Council	n/a	n/a	n/a	n/a	n/a	n/a
Eastbourne Borough Council	5,022 by 2027 240 per annum	<b>400</b>	336 (capped)	No modelling undertaken to date	No modelling undertaken to date	Eastbourne & South Wealden HMA number TBD
Lewes District Council	6,900 <b>345</b> per annum	520	483	345 LP plus an additional +50% allowance for Newick	Tunbridge Wells – OAN 648 per annum Sevenoaks – OAN 620 per annum Wealden – OAN 832 per annum Mid Sussex – inspector figure 1,026 per annum	520 (higher end) Lewes District (including the Park) within the Coastal West Sussex HMA

Authority Name	Adopted Local Plan housing number	OAN	DCLG new methodology	Numbers used for own LP (and in any modelling work undertaken so far if different)	Numbers used for other LPAs in modelling work	HMA figure
					Tandridge – OAN 470 per annum	
Mid Sussex District Council	<p>The emerging Mid Sussex District Plan 2014-2031 sets a minimum housing provision figure of 16,390 homes.</p> <p>For the purposes of calculating the five-year housing land supply a ‘stepped trajectory’ will be applied through the calculation of a 5-year rolling average. The annual provision in this stepped trajectory is <b>876 dwellings per annum for years 2014/15 until 2023/24 and thereafter, from 1st April 2024, 1,090 dwellings per annum until 2030/31</b>, subject to future HRA on further allocated sites, to meet unmet needs of neighbouring authorities.</p>	14,892 (an average of 876 dwellings per annum) for 2014-2031	1,016 dwellings per annum for 2016-2026	See second column	<p>Growth assumptions for surrounding authorities used in the transport model:</p> <p>Crawley – 6,908                      Wealden – 8,988                      Lewes – 6,032                      Brighton &amp; Hove – 14,301                      Horsham – 16,701                      Tandridge – 6,395</p>	<p>Northern West Sussex HMA</p> <p>Crawley – 675                      Horsham – 650                      Mid Sussex – 876</p> <p>= 2,201 dwellings per annum</p>
Rother District Council	335 net dwellings pa	363 pa	469 pa (capped) 737 pa (uncapped)	n/a	n/a	Hastings and Rother HMA (as at 2014): 767 pa



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<b>Authority Name</b>	<b>Adopted Local Plan housing number</b>	<b>OAN</b>	<b>DCLG new methodology</b>	<b>Numbers used for own LP (and in any modelling work undertaken so far if different)</b>	<b>Numbers used for other LPAs in modelling work</b>	<b>HMA figure</b>
Sevenoaks District Council	165 / yr 3,300 over 20 year (2006-2026)	12,400 (2015-35) 620 pa	698pa	<b>620 / 698</b>	n/a	Tonbridge & Malling Tunbridge Wells
South Downs National Park Authority	There are several figures currently operating across the National Park but not one park-wide figure	447	Not applicable	<b>250</b>	Tunbridge Wells – OAN 648 per annum Sevenoaks – OAN 620 per annum Wealden – OAN 832 per annum Mid Sussex – inspector figure 1,026 per annum Tandridge – OAN 470 per annum	Coastal Sussex HMA : 274 Eastbourne and Wealden HMA: 14 Northern West Sussex HMA: 14 Central Hants : 144
Tandridge District Council	125 dpa	<b>470</b>	645	TBC	470	470
Tunbridge Wells Borough Council	The adopted Core Strategy figure is 300 per anum	<b>648</b> (SHMA 2015)	692	648	As above	Tunbridge Wells Borough is considered to be in a HMA which includes Sevenoaks, Tonbridge and Tunbridge Wells and extends to include Crowborough, Hawkhurst and Heathfield.

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<b>Authority Name</b>	<b>Adopted Local Plan housing number</b>	<b>OAN</b>	<b>DCLG new methodology</b>	<b>Numbers used for own LP (and in any modelling work undertaken so far if different)</b>	<b>Numbers used for other LPAs in modelling work</b>	<b>HMA figure</b>
Wealden District Council	450 dwellings per annum or 9,600 in total 2008 - 2027	950 DPA	1247 (check)	11,456 (total) for Ashdown Forest modelling 11,724 for Lewes Downs and Pevensey Levels (revised figures post March 2017 Draft WLP).	2014 tempo data	Not yet determined.
West Sussex County Council	n/a	n/a	n/a	n/a	n/a	n/a

## Appendix 5 - Ashdown Forest Transport Model Analysis

This table sets out the key elements of the transport modelling undertaken as part of HRA work for the respective local planning authorities. It also sets out some analysis prepared by West Sussex County Council on the major and minor differences and commonalities of the approaches taken.

Key	Model Base Year	Geographical Coverage	Road Network in Forest	Origin to Destination Demand Data Sources	Data Types for Base Year Validation	Origin to Destination Zone Definition	Forecasting Years	Trip Generation Methodology	Demand Changes Assessed in Study	Forecasting Background Growth	Time Periods Directly Modelled	Modelled Responses to Congestion	Other European Designated Sites Assessed?
<b>Assessment of level of difference between Models:</b>													
Colour Coding													
Comments	Two models are grown from older bases, whilst other models are all from 2014	Whilst all models include the Ashdown Forest SPA, there is wide variation in the choice and extent of which other areas are included, reflecting the location of the client authorities	All models include all the A class roads. Two models have represented B class roads and one minor road, although the assignment did not use them. One model also represents a number of Class C roads	There is a split between those models which use roadside interview data, - which captures all journey purposes but is based on a sample which requires infilling with data such as NTEM and NTS – and those which use 2011 census journey to work which captures only one journey purpose but with universal spatial coverage in UK and very high response rate	All models use continuous automatic traffic counters as a primary source of volumetric data. The extent to which manually observed data for junction turning movements or links is used varies and only two models have reported journey time observations.	All model zoning systems are based on Census areas, but the level of aggregation between models and and uniformity across parts of individual models is varied.	The headline forecasting year has a relatively narrow range from 2028 to 2033 (five years) No models have yet assessed intermediate forecast years for plan phasing. One model with an older base year has also used a present day forecast for comparison.	Universal use of TRICS for site specific trip generation. There will be some minor variations in use of site selection parameters where information is available.	All models assessed planned housing and employment. There is some difference in approach to smaller sites which may not vary in overall quantum from unplanned development trends. Some models concentrate mainly on individually modelled strategic sites with others treating all sites included in a Local Plan together by adjusting NTEM totals.	All models use TEMPro/NTEM with the version used reflecting the time when the model forecasting was started. There is some difference in approach to how TEMPro/NTEM is applied and the definition of what is background, with some models treating small non-strategic allocations or planned dispersed development along with background, whilst others treating all sites included in Local Plan together.	There is a split between those models which assess AADT traffic directly and those which simulate hourly flows, with AADT forecasts being calculated by factoring derived from observations.	All but one model allow re-routing. One model uses fixed routings; although there can be two alternative routings between O-D pairs, this does not vary according to travel times/costs. Two models allow destination choice, with only one model allowing mode choice.	This varies greatly according to the geographical extent of the model and study area, in particular the location of the client planning authority in relation to other designated sites.

## Appendix 6 - Ashdown Forest Air Quality Calculations Methodology Information

This table sets out the key elements of the air quality calculations undertaken as part of HRA work for the respective local planning authorities.

Authority & consultant	Chemicals monitored and assessed in forecasting	Conversion ratios from NO <sub>x</sub> to N	Background improvement assumptions	Rate of dispersal from the centre line of the road up to 200m	Type of habitat included in the assessment – e.g. woodland in roadside vegetation.
South Downs National Park Authority, Lewes District Council, Tunbridge Wells Brough Council, and likely Tandridge District Council - AECOM	NO <sub>x</sub> , N deposition, Acid Deposition	NO <sub>x</sub> to NO <sub>2</sub> conversion calculated using Defra's NO <sub>x</sub> to NO <sub>2</sub> calculator. Then NO <sub>2</sub> multiplied by 0.1 for N deposition as per DMRB guidance.	For N deposition -2% applied up to 2023 (equivalent of 1% per year for plan period to 2030). Improvements in background concentrations and emission rates assumed following Defra assumed improvements up to 2023.	Modelled using dispersion model ADMS-Roads, written by CERC.	A precautionary assumption was made that pristine heathland (the SAC feature) was present, or could be present in the future, at any point on the modelled transects irrespective of existing habitat at that location. Therefore heathland was the only modelled habitat.