

Duty to Cooperate Statement

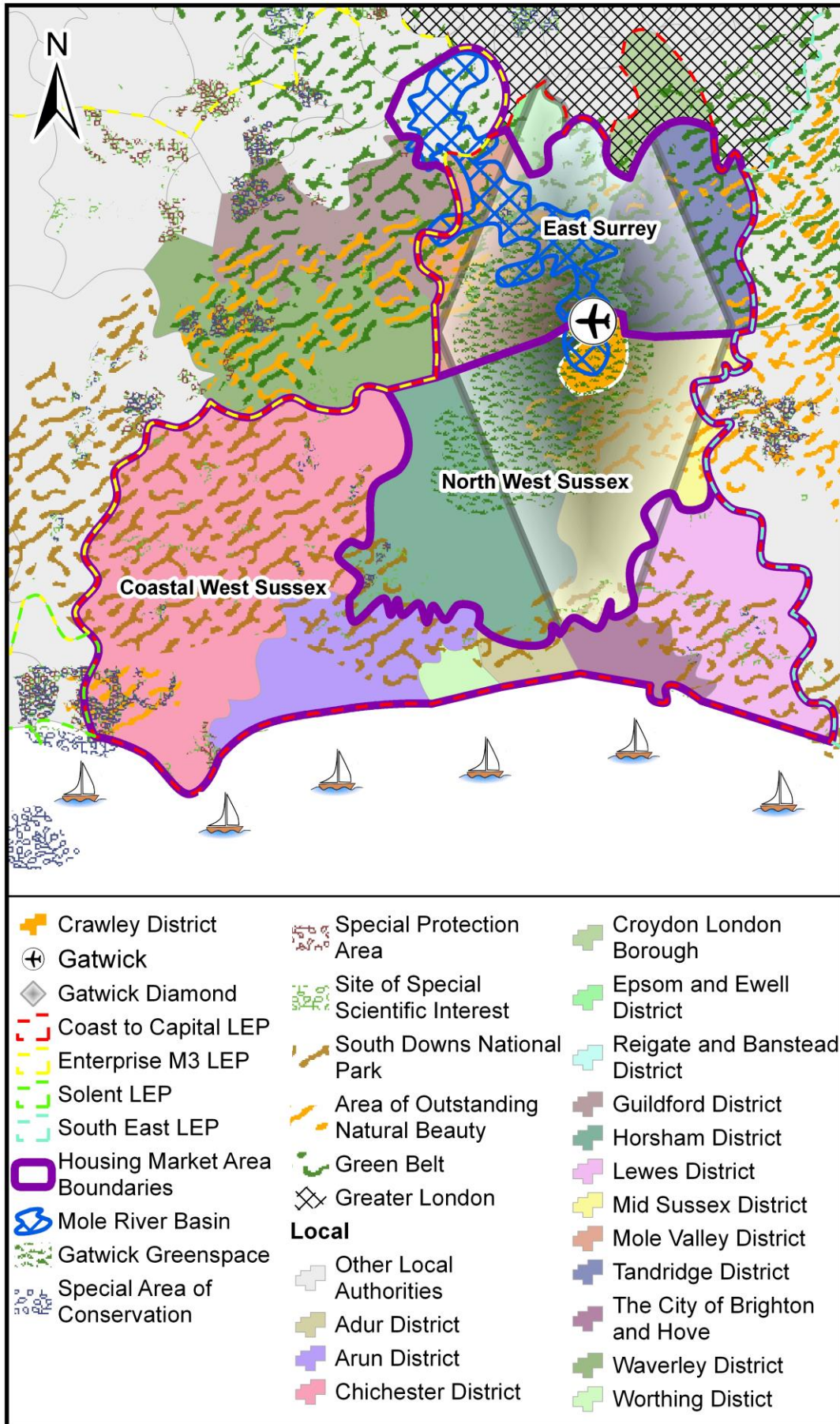
for the Crawley Borough Local Plan 2015-2030

November 2014



Crawley Borough Local Plan Duty to Cooperate Statement

November 2014



Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Contents		Page
Summary		5
1	Introduction	12
2	Context	13
3	Framework for Cooperation	18
Issue A	Meeting Housing Needs	25
Issue B	Gypsy, Traveller and Travelling Showpeople	36
Issue C	Economic Growth	39
Issue D	Gatwick Airport	44
Issue E	Key Transport Routes	48
Issue F	Flooding and Flood Risk	51
Issue G	Climate Change and Low Carbon Economy	56
Issue H	Broadband Infrastructure	59
Issue I	Green Infrastructure	61
Issue J	Water and Wastewater Infrastructure	66
	Appendix A: Timeline for Key Duty to Cooperate Milestones	68
	Appendix B: Summary of Joint Evidence Base Documents	76
	Appendix C: List of Prescribed Bodies and Statutory Consultees	78
	Maps: Local Authority Areas	79
	Maps: Gatwick Diamond Authorities	80
	Maps: Housing Market Areas	81
	Maps: Coast to Capital Local Enterprise Partnership Local Authorities	82
	Appendix D: Strategic Joint Working Mechanisms	83
	Appendix E: Prescribed Bodies Responses to Draft Duty to Cooperate Statement	102
	Appendix F: Crawley Borough Council Duty to Cooperate Request (August 2014)	121
	Appendix G: Local Authority Responses to CBC Duty to Cooperate Request	127

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Summary

This statement illustrates how the Crawley Borough Council Local Plan has been prepared within the context of, and shaped by, continual and effective cooperation across administrative boundaries on key strategic issues; ensuring that impacts beyond Crawley's borders have been effectively addressed.

This has involved participation in an evolving collaborative approach with all partner bodies relevant to each specific issue identified. Crawley Borough Council, at officer and member level, has been a leading and adaptable participant in a wide range of formal and informal groupings, delivering practical outcomes and solutions to cross boundary and strategic issues. These have been in the forms of:

- Substantial joint technical evidence documents – including strategic matters such as Strategic Housing Market Assessment and Economic Growth Assessment, down to specific assessments aimed at finding solutions, resulting in documents such as the At Crawley, Bio City, and New Market Town studies.
- A Joint Area Action Plan with Horsham District Council delivering a new neighbourhood including 2,500 dwellings and a range of public services including green infrastructure and a new neighbourhood centre in the form of an urban extension immediately outside of Crawley's administrative boundaries.
- Understanding of the need to maximise capacity for Crawley to meet needs within the borough boundary as far as is possible and re-distribute unmet objectively assessed needs according to the principles of sustainable development.
- An agreed overarching Local Strategic Statement (LSS) setting the spatial approach for the Gatwick Diamond functional economic area.
- A Section 106 agreement and supporting Memorandum of Understanding for the management and control of environmental impacts from Gatwick Airport on a wide area surrounding the airport, and shared information and the monitoring of noise and air pollution at Gatwick Airport.
- Common policies/approaches for many planning policy topic areas, including broadband, tackling climate change and water management.
- Agreements for continual joint working to identify longer term solutions, particularly for meeting housing and economic growth needs, including with the local authorities across Gatwick Diamond and West Sussex. Particularly by improving links with the Coastal West Sussex local authorities including Brighton and Hove and Lewes and delivering the challenges identified in the two complementary sub-regional Local Strategic Statements, recognising the overlaps between the economic and housing market areas.

Crawley is the largest town between London and the South Coast and continues to grow both as a place to live and as a place to work. However, it has tight administrative boundaries, and its recent history as a comprehensively planned New Town means there is little available land within the built up area as every undeveloped area has a specific purpose such as structural landscaping or public open space. There is also only a limited amount of land beyond the existing built up area which might be considered for development. Some of this already has outline planning consent for a new neighbourhood, with development anticipated to commence in 2015, and another portion is constrained by nationally-led policies

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

which safeguard land for a possible second runway at Gatwick Airport. These constraints have shaped the way in which the council has sought to address the strategic planning issues which the town faces – making best use of what land is available to support the growing economy, ‘leaving no stone unturned’ in a search for suitable sites to help meet future housing and economic needs and working with other local authorities first to understand and then to address issues which cannot be resolved solely within the borough.

The council recognises that it has not been possible to achieve a complete solution to all the issues which it has identified. However, its commitment to cooperation with adjoining authorities throughout the plan-making process has led to their acknowledgement of Crawley’s needs, amendments to emerging local plans in neighbouring areas in recognition of Crawley’s needs, and formal agreement on the way in which neighbouring authorities will help meet Crawley’s unmet needs.

This is not the end of the process and the council is continuing to work with other authorities to investigate and find solutions to long-term strategic issues which face both them and Crawley borough. A network of working arrangements has evolved to address the pressures of meeting existing and future needs across the wider area. As these arrangements have developed, the working relationships between the partner organisations have strengthened offering confidence that emerging and new issues that may arise over the Plan period can be addressed in a similarly constructive manner. The boundaries within which issues need to be addressed are not always clearly defined and the council will work with others to ensure that the working arrangements evolve to reflect this.

The Crawley Local Plan includes a commitment to monitoring and review to ensure the continuing deliverability of the Plan. This will be undertaken through the council’s monitoring report which will assess whether the Local Plan is meeting its strategic objectives, and that the planned housing, employment growth and infrastructure is being delivered. Alongside this monitoring, the ongoing joint working, and outcomes of meeting the duty to cooperate will be reported, to ensure that the commitments are effective.

Details of the outcomes in meeting the Duty to Cooperate are provided in the main body of this report and in the appendices. However, a brief overview of the framework which has evolved and within which the council has sought to address its duty to cooperate and of the main strategic issues being worked through jointly is set out below, summarising the key current outcomes and positions established through the ongoing cooperation.

The Framework for Cooperation

The framework within which cooperation takes place has evolved over the period within which the Plan has been prepared and will continue to evolve to reflect the particular issues which Crawley and neighbouring authorities face. References to the different components of this framework and the way they have contributed to the cooperation between Crawley and other bodies are included in the main body of the report. Key components are:

1. **The Gatwick Diamond Local Authorities.** The Gatwick Diamond Local Authorities, covering north West Sussex and East Surrey, came together to provide a forum for cooperation and joint working at a strategic level. Working under the umbrella of the Gatwick Diamond Initiative, now one of the Coast to Capital LEP’s core area partnerships and a gateway for the local authorities to the LEP, outputs include a jointly prepared Local Strategic Statement and a Memorandum of Understanding, both of which have been integral to the way in which the council’s Local Plan has evolved. The presence of this forum has

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

supported formal and informal cooperation at both officer and member level, enabling difficult and sometimes sensitive cross boundary issues to be discussed and addressed, including consideration of the needs arising from London.

2. **The West Sussex Joint Planning Board.** The West Sussex Joint Planning Board, and the Chief Planning Officer network which supports it, has facilitated a wider understanding of strategic issues as they relate to West Sussex as a whole. This Board was expanded to include the remaining Coastal Sussex Authorities (Brighton and Hove City, Lewes District and East Sussex County Councils). In addition, underpinning this, a series of joint officer meetings have taken place to understand the housing needs and capacity issues and discuss solutions.
3. **Northern West Sussex Local Authorities.** The northern West Sussex Local Authorities have facilitated cooperation on both housing and economic issues. Working within the wider framework of the Gatwick Diamond, the authorities have continued to work together on focused issues and have produced a formal Position Statement setting out what has been done and what outcomes have been achieved.
4. **Groupings established to address specific issues.** These include:
 - the Gatwick Local Authorities, established to consider issues specifically relating to Gatwick Airport
 - the Upper Mole Group, established to work on flood management issues
 - Gatwick Greenspace partnership, established to provide the strategic framework for green infrastructure planning.
5. **One to one discussions with other local authorities, prescribed bodies and other infrastructure providers when appropriate.**
6. **Internal Borough Council meetings.** Including regular updates on issues relating to the Duty to Cooperate as part of the cross-party members' Local Plan Working Group.

Meeting Housing Needs

It has been recognised since early in the Local Plan process, as far back as the initial Issues and Options consultation in 2009, that Crawley's housing needs could not be fully met from within the borough boundary. The council has responded by seeking to ensure that every reasonable opportunity to deliver new housing from within the borough has been secured whilst working with other authorities to ensure that, so far as possible, unmet needs are met within the wider housing market area. Joint studies have been undertaken on potential options for housing delivery, and formal agreements, including a Joint Area Action Plan, prepared through cooperation at officer and member level.

Crawley's Local Plan now proposes a 'supply-led' figure which will meet approximately 60% of the total objectively assessed housing need for the town over the Plan period to 2030. This results in an anticipated total shortfall of around 3,120 dwellings over the Plan period.

Agreement has been reached across the northern West Sussex Housing Market Area (HMA) that Crawley is doing all it can to maximise its capacity for housing development within the constrained borough boundaries. A Joint Position Statement has been signed acknowledging this, recognising that, at this stage, emerging local plans are not meeting the full needs of the housing market area, and confirming that the other local authorities are doing the maximum which they consider reasonable to meet objectively assessed housing needs, not just from within their own areas, but

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

from across the housing market area as a whole¹. Following joint working with Reigate and Banstead Borough Council and representations from Crawley to its emerging Core Strategy, the adopted Reigate and Banstead Core Strategy also now contains an acknowledgement that its housing figure, which allows for some continuing in-migration, would contribute to meeting unmet needs of other local authorities, including those within the wider East Surrey and North West Sussex HMAs.

Pressure is placed on all the local authority areas across West Sussex and Surrey to meet increasing housing need and demand, and solutions for both the short and longer term will need to be identified and agreed to ensure meeting this provision delivers truly sustainable development. The council is committed to continued working with other authorities to help in understanding and addressing these needs.

Gypsy, Traveller and Travelling Showpeople

The needs of Gypsies, Travellers and Travelling Showpeople were recognised as an issue which could require cooperation and joint working.

A standardised methodology, building on joint working from the Surrey Authorities and utilising 'good practice' examples from authorities within Coastal West Sussex, was examined by the Gatwick Diamond local authorities. This survey work was subsequently further refined to meet the very specific needs of Crawley whereby the largest proportion of the existing Gypsy and Traveller community live within bricks and mortar accommodation, and there are no existing public sector-run sites within the borough.

Joint working recognised that each administrative area within the Gatwick Diamond and West Sussex could and should make provision to meet the permanent accommodation needs of Gypsies, Travellers and Travelling Showpeople arising from within its own area. Accordingly, the Crawley Local Plan allocates a reserve site for meeting needs potentially arising from the local community within the Plan period.

Joint working across West Sussex authorities and in partnership with Sussex Police has identified a solution to meeting the wider area needs for a transit site. A site has been planned in Chichester District to serve the whole West Sussex county area. All West Sussex authorities will share the costs of this provision.

Economic Growth

Consistent evidence has shown that Crawley holds a dominant and important strategic role in the economic function and growth of the wider area.

The Gatwick Diamond Initiative was founded by local authority and business partners to ensure the area surrounding Gatwick Airport continues to compete and succeed in a national and global market. This joint working, encapsulated in the Gatwick Diamond LSS, agrees a hierarchical and complementary role provided by the existing and planned main employment locations and town centres across the Gatwick Diamond authority areas.

The Local Plan for Crawley has been prepared within the approach agreed at the Gatwick Diamond level that, within the short and medium term, the primary focus for new business development would be in the areas around Crawley and Gatwick. It reflects the Diamond's longer term direction which seeks to secure growth focused on sustainable locations within the Diamond and on improvements to existing business areas. The Crawley Local Plan seeks to maximise the supply of business floorspace to meet the predicted objectively assessed need. However, it is currently restricted in promoting and delivering the most sustainable location for the provision

¹ Crawley Borough, Horsham District, Mid Sussex District, and Reigate and Banstead Borough.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

of a significant quantum of floorspace, including the possibility of a new strategic employment location, due to the need to continue to safeguard land that may be required for a second runway at Gatwick Airport.

The council will continue to cooperate with the authorities in the Gatwick Diamond to help address longer term issues and, following a government decision on the future of UK aviation capacity growth, the longer term options for delivery of a strategic employment location within the safeguarding area to support economic growth in relation to qualitative and quantitative demand will be considered.

Gatwick Airport

As the world's busiest single runway airport, Gatwick Airport creates a number of economic and environmental issues which extend beyond Crawley's administrative boundaries.

Well-established joint working arrangements, led by the borough council and the county council, have successfully delivered successive Section 106 Agreements for controlling environmental impacts created by the airport, supported by joint monitoring arrangements. The joint monitoring arrangements continue at both officer and member level and preparations are being made for a further review of the Section 106 agreement which expires in 2015.

Whilst individual responses were made to the Airports Commission on the Stage 1 submission by Gatwick Airport for a second runway, joint evidence was prepared to aid understanding of the impacts for the surrounding authorities. Joint discussions involving the surrounding local authorities and Gatwick Airport have also been held and mechanisms are in place to continue this now Gatwick's proposals have been shortlisted for consideration in Stage 2.

Key Transport Routes

Crawley sits on the boundary of two county councils, and has a mainline railway and motorway running through the borough. Its bus network links into neighbouring districts. Strategic transport issues were identified for the Gatwick Diamond, through joint working, highlighting three areas on which transport policy should be focused:

- Improvement of public transport
- Investment into sustainable transport at the regional hubs: Crawley/Gatwick and Reigate/Redhill
- Improvement of strategic links to provide connectivity beyond the Gatwick Diamond.

West Sussex and Surrey County Councils provide the role of the Local Highway Authority. Whilst the detailed individual technical evidence work needed to support each local authority Local Plan has been prepared primarily on a borough-wide basis, this has been set within the strategic context of Gatwick Diamond and county-wide information and priorities, and has involved the sharing of information. This includes ensuring the work is coordinated across the county level by the county council and across the county boundaries into Surrey, between the two adjoining county authorities.

Critical improvements are currently being carried out or are programmed to be carried out to the strategic network by the Highways Agency to the M23 and A23. Similarly, works to improve the Brighton mainline railway and Gatwick Station are being undertaken by Network Rail and the airport. The Thameslink project is due to finish in 2018, for which Three Bridges will be the operations centre with new signalling centre and maintenance facilities.

Flooding and Flood Risk

Crawley borough sits at the southern end of the Mole River catchment, with the river flowing northwards. Measures to manage and understand fluvial flood risk on a strategic level are supported by expertise from the Environment Agency, whilst the management of surface water flooding is supervised by the County Council. Consenting and enforcement of changes to smaller watercourses has been delegated down to the district and borough level within West Sussex.

For Crawley, development (particularly where it increases runoff into the river system) could impact on river flooding downstream within the River Mole catchment. This flows northwards towards the Thames and has implications for Gatwick Airport and neighbouring authorities, particularly Reigate and Banstead and Mole Valley. Measures including agreed Local Plan policy wording in relation to development and flood risk have evolved from joint working across the Upper Mole flood group and the preparation of a Local Flood Risk Management Strategy from working together with the County Council through joint Flood Risk Management meetings. Crawley's Strategic Flood Risk Assessment has been prepared in partnership with the Environment Agency within the context of the wider river basin area.

Climate Change and Low Carbon Economy

Crawley Borough Council is committed to supporting the town in achieving carbon neutrality and zero waste by 2050. The challenges of global warming are similarly recognised across the wider area.

Sharing technical evidence and emerging policies ensures a consistent approach is being taken across the various authority areas, whilst allowing these to be adapted and appropriate for the differing circumstances relevant to each administrative area.

Commitments between the Gatwick Diamond Authorities particularly establish a strong foundation for joint working to develop and support innovative projects which will help reduce the Diamond's carbon footprint.

Broadband Infrastructure

Broadband coverage was identified as an issue which needed addressing strategically across the area, as it affected the economic growth of rural areas and main employment areas alike.

The outcomes from this joint working have resulted in the inclusion of a consistent policy approach within the emerging Local Plans across the Gatwick Diamond and West Sussex county areas, and the roll-out of highspeed broadband in the areas identified previously as without coverage.

Green Infrastructure

Crawley was planned and designed as a New Town set within the countryside and had many green spaces and landscaped areas integrated within the neighbourhoods from the outset. This establishes Crawley's opportunities to maintain its position as an 'urban forest' through implementation of the 'character' and open space policies within the Local Plan and to support the government's aim to create an overall net gain in biodiversity.

Whilst the local policies within the Local Plan can ensure the implementation on a site-by-site basis of improvements, enhancements and extensions to the green infrastructure network, it is acknowledged that nature and landscapes do not respect administrative boundaries.

By identifying the strategic linkages and critical habitats and areas of importance for the purposes of nature, flood alleviation and recreation across the strategic area,

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

each individual administrative area understands the role it plays within this wider picture. The important elements necessary for protection and enhancement can be identified, forming the basis of a hierarchical approach for sound policy development. This will ensure green infrastructure at a landscape wide level can be properly planned for. This is led by the Gatwick Greenspace partnership.

Water and Waste Water Infrastructure

As a Local Authority in south east England, Crawley suffers from water-stress, and the water usage of its residents and businesses have implications on the water availability across the wider area. It is also the location for one of the waste water treatment works in the area, and as such the infrastructure network is critical to supporting deliverable developments.

The Outline Gatwick Water Cycle Study was jointly commissioned by the local authority partners, the Environment Agency and the water companies operating across the area. A Crawley-focused update was commissioned recently.

The outcomes of this joint working have led to a consistent policy approach across the area in relation to water management, and an understanding of the quantity of development currently capable of being catered for by the Crawley Wastewater Treatment Works, which will ensure any further development delivery beyond that already planned will require phasing in line with upgrades to the system.

1. Introduction

- 1.1 The Localism Act 2011² and the National Planning Policy Framework 2012 (NPPF) place a Duty to Cooperate on local planning authorities and other prescribed bodies to address strategic planning issues relevant to their areas in the preparation of their Local Plans and other planning documents and to work together on such issues.
- 1.2 The Duty applies to all local planning authorities, national park authorities and county councils in England, and to a number of other public bodies. The new duty:
 - relates to development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
 - requires that councils set out planning policies to address such issues;
 - requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies;
 - requires councils to consider joint approaches to plan making.
- 1.3 The NPPF provides further guidance on meeting the Duty to Cooperate in plan-making. It reaffirms the principle that local planning authorities should work collaboratively to ensure that strategic priorities across local authority boundaries are properly coordinated and clearly reflected in individual local plans, and indicates that joint working should enable local authorities to work together to meet development requirements which cannot be wholly met within their own areas³.
- 1.4 The NPPF does not specify in detail the issues on which local planning authorities should cooperate but puts particular emphasis on cross boundary issues relating to the five 'strategic priorities' which the government considers should be addressed in Local Plans:
 - Homes and jobs
 - Retail, leisure and other commercial development
 - Infrastructure
 - Community facilities
 - Climate change and adaptation and the natural and historic environment.

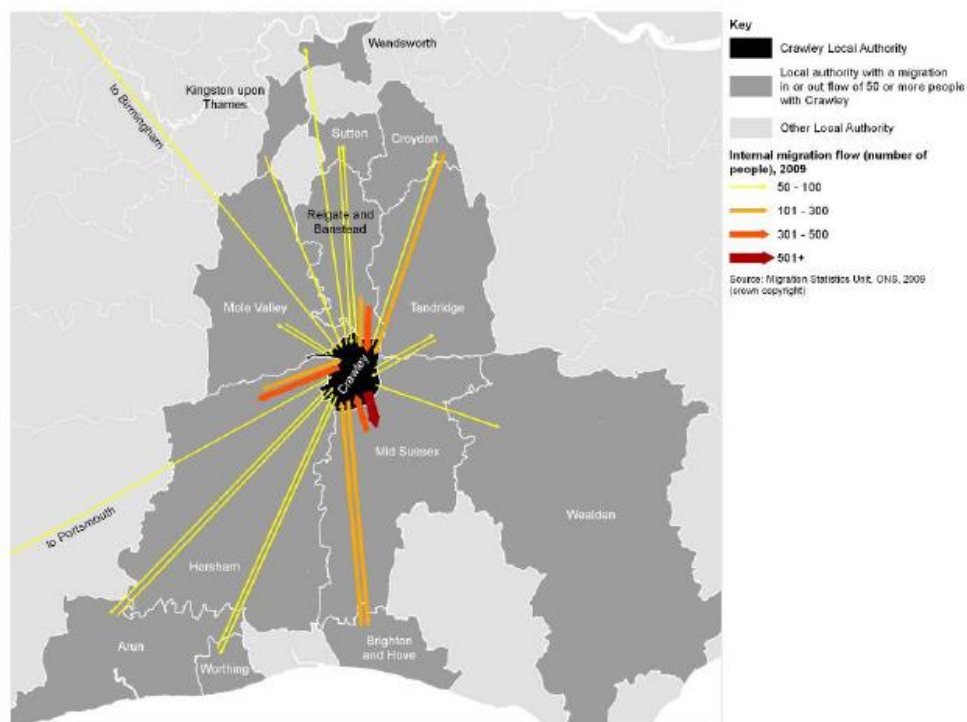
² Section 110 of the Localism Act provides the legislative basis for the Duty by transposing it into a new Section 33a of the Planning & Compulsory Purchase Act 2004.

³ Paragraph 179, National Planning Policy Framework, Department for Communities and Local Government (2012)

2. Context

- 2.1 Crawley is located between London and the south coast; situated in the north eastern part of the county of West Sussex. It shares its boundaries with Horsham district to the west, Mid Sussex district to the south and east, and districts in the county of Surrey to the north of the borough, beyond Gatwick Airport. Its administrative boundaries are tightly drawn around the town itself, with very little land falling outside of the built up area.
- 2.2 Migration patterns for Crawley (see Figure 1) show a strong relationship with neighbouring areas of Mid Sussex, Horsham and Reigate and Banstead, as well as areas further south such as Arun, Worthing, and Brighton and Hove. Similarly, commuting patterns provide some indication of the role Crawley plays across this wider area in providing employment for significant numbers of people; including those living in Brighton and Hove, Chichester and Eastbourne to the south, and from residents located within Surrey authorities to the north – in particular Reigate and Banstead and Croydon.

Figure 2.8 Internal Migration Patterns for Crawley Borough, 2009



Source: ONS Migration Statistics Unit, 2009 / NLP analysis

Figure 1: Internal Migration Patterns for Crawley Borough, 2009

Source: Crawley Borough Council Locally Generated Housing Needs Assessment (2011) Nathaniel Litchfield & Partners

- 2.3 Due to Crawley's central location within the Gatwick Diamond, it is expected that the majority of cross-boundary and strategic planning issues will be focused within existing joint working structures which are already well-established between the council and the adjoining authorities. However, there are a number of issues which may have a wider than Gatwick Diamond concern, such as across the Coast to Capital Local Economic Partnership area. These have involved building on the cross-partnership work between the Coastal West Sussex and Gatwick Diamond Authorities.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

2.4 Other issues have very different geographies of influence. These include Gatwick Airport and the Upper Mole River catchment area. For these matters specific mechanisms at the appropriate levels and with involvement of appropriate bodies have been formed.

2.5 The strategic issues relating to the future development of Crawley over the Local Plan period have been identified as including:

- a) Meeting housing needs
- b) Gypsy, Traveller and Travelling Showpeople
- c) Economic growth and retail offer
- d) Gatwick Airport
- e) Key transport routes
- f) Flooding and flood risk
- g) Climate change and low carbon economy
- h) Broadband Infrastructure
- i) Green Infrastructure
- j) Water and Wastewater Infrastructure

Other issues, such as education, health, and other types of infrastructure provision, do involve discussions with West Sussex County Council, neighbouring authorities, or organisations working beyond the borough boundary. However, these deal with specific matters, usually on a one-to-one basis, and are not therefore considered to be strategic in terms of the Duty to Cooperate. The outcomes of these discussions are set out in the Infrastructure Plan accompanying the Local Plan.

2.6 The strategic issues are currently discussed beyond the borough's administration within a wide and evolving framework of cooperation. Much of the joint working has been based on well-established and successful partnerships and these have been adapted as new issues have emerged, and the narrowing down of evidence has allowed for more focused working to establish and deliver outcomes. The different forms of cooperation are set out below, with the key **outcomes** highlighted in bold:

- Individual discussions on a one-to-one basis with neighbouring authorities: Mid Sussex District Council, Horsham District Council, Mole Valley District Council and Reigate and Banstead Borough Council at an officer and Member level. Including as part of the preparations for the **adopted Joint Area Action Plan** for the West of Bewbush neighbourhood adjoining Crawley boundaries, within Horsham District administrative areas, and establishing the **recognition in the Reigate and Banstead Borough Council Core Strategy and the draft submission Horsham District Planning Framework** that making provision for some in-migration in the authorities' housing targets will help to accommodate unmet need from neighbouring authorities.
- Meetings with Northern West Sussex Authorities, with Mid Sussex District Council and Horsham District Council, at senior officer/Chief Executive and Member level; and commissioning joint evidence base such as the Strategic Housing Market Assessment and the Economic Growth Assessment, and **establishing full understanding of housing and employment needs and strategic sites/broad locations across the North West Sussex area** in developing the **Joint Position Statement for Strategic Issues** and the **joint SHLAA Appendix**.
- Participating at a Gatwick Diamond level, with the Gatwick Diamond Authorities (crossing the County boundary between West Sussex and Surrey) and Business representatives, at an officer and Member level.

Jointly preparing and signing up to the **Gatwick Diamond Memorandum of Understanding, Local Strategic Statement** (particular implications for Crawley are identified below), **Local Strategic Statement Delivery Plan**, and **Sustainability Appraisal/Strategic Environmental Assessment Statement**, and links into the Coast to Capital Local Economic Partnership. The GROW sub-group of the Gatwick Diamond successfully achieved a collective push for **broadband roll-out** and **consistent policy requirement in all Local Plans to ensure connectivity for fibre**. Links through the Surrey Authorities also includes consideration of longer term issues relating to needs arising from the growth of London. Joint responses from the Gatwick Diamond were submitted to the Further Alterations of the London Plan, with all the Diamond authorities represented by a Gatwick Diamond representative at the Examination Hearings. A joint response was also submitted to the London Infrastructure Plan.

- Considering County issues, through meeting with West Sussex Authorities at officer and Member levels. These were extended to include all the Coastal Authorities including Brighton and Hove City and Lewes District adjoining to the east of Mid Sussex District and forming part of the Brighton Housing Market Area, as well as East Sussex County to ensure this representation offers joined-up, deliverable solutions. This work has ensured a **commitment to consider solutions for meeting the longer term housing needs emerging from the whole area**.
- Involvement on a river catchment management level as part of the Upper Mole flood group, alongside similarly affected Authorities and the Environment Agency. This joint working has established the **Gatwick Water Cycle Study** the **Crawley SFRA** and **Local Plan policies relating to flooding and water management**.
- There are a number of established groupings relating to the functioning and development of Gatwick Airport, these include monitoring of airport-related noise and flight path tracking, improvements to surface access and transport links and the agreements of a **Memorandum of Understanding** that ensures the **monitoring of S106 actions and implementation**. These groups are currently engaged in responding to the Airports Commission's assessment of Gatwick Airport's second runway proposals.

Joint Approaches to Plan Making

- 2.7 A successful Joint Area Action Plan was completed through joint working with Horsham District Council for the new neighbourhood west of Crawley, now on site. If similar situations arise in the future, a similar process would be considered.
- 2.8 The Gatwick Diamond Local Authorities Memorandum of Understanding established a broad framework for cooperation across the Gatwick Diamond area. Within this context the opportunities for producing a Joint Local Plan both across the Gatwick Diamond or across the northern West Sussex Area have been considered and agreed would not be necessary.
- 2.9 Initially, at the Gatwick Diamond level, it was agreed that a Local Strategic Statement for the whole area would provide sufficient spatial context and commitment to ensure detailed matters could be implemented through the preparation of each individual Local Plan. This was a pragmatic decision, allowing for the differing timescales and status of the individual Local Plans in each authority area.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

- 2.10 The merit in preparing a joint plan was, however, reconsidered by the three northern West Sussex Authorities as part of the focused look and scope of the Position Statement. At this stage, it remained a conclusion that a Joint Plan across the three administrative areas would not be necessary due to the very positive and effective joint working carried out between the authorities, the continuing differing timescales and advanced progression of the emerging Plans and the differing, although complementary, priorities of each Authority. Therefore, work continued on separate plans.

Joint Evidence Base

- 2.11 Evidence to support the Local Plan has been carried out at a variety of levels, depending on the appropriate scale of the information required and issue being considered. Consideration has been given at every stage in commissioning new evidence as to whether it would be necessary or advantageous to carry it out at a wider than borough level, and, if so, what would be the appropriate level to ensure the evidence remains meaningful and adds value for all partners. In some cases, it has been concluded that evidence is sufficient on a borough-wide basis, particularly where Crawley's very uniqueness sets it apart from the neighbouring areas – for example, the borough-wide detailed heritage studies have been able to focus on the unique character of the town's recent history as a twentieth century planned New Town. Other detailed evidence has taken existing strategic information to focus on a local level: for example, the Landscape Character Assessment for the town builds upon the West Sussex and English Nature studies and those of the neighbouring authorities within which much of the setting of the town is located.
- 2.12 However, joint working on evidence studies has long been recognised as the most appropriate form in many cases. This has continued through the preparation of the new Local Plan, with work being taken forward and updated where necessary. Joint evidence base work includes Strategic Housing Market Assessments, economic growth assessments and studies on appropriate locations for strategic housing. Appendix B summarises all of this evidence. This evidence was either prepared in collaboration with neighbouring authorities or other prescribed bodies, and looks beyond borough boundaries and considers cross boundary challenges and solutions.

The Influence Cooperative Working has had on the Local Plan

- 2.13 Crawley's Local Plan has continually been influenced by its sub-regional context and the ongoing discussions. The full timeline of the Local Plan preparation alongside key Duty to Cooperate milestones is set out in Appendix A. The Plan has regularly been updated and amended to reflect emerging evidence in relation to the responsibilities and influences generated by the borough. This is clearly shown by the development of the Plan from the early Issues and Options Topic Papers and Strategic Development locations published for stimulating discussion on the scope of the Core Strategy Review in 2009. This debate was revisited in the second Issues and Options period in January 2012. All comments and discussions from both the 2009 and 2012 Issues and Options consultations and the other elements of ongoing joint working (including that in relation to the Gatwick Diamond Local Strategic Statement) fed into the preparation of the preferred strategy Local Plan.
- 2.14 Responses from Prescribed Bodies as part of the preferred strategy consultation and ongoing discussions in the formal meetings led to further evidence being sought and additional sites being consulted on for their development allocation or protection designation, the outcomes of which

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

combined with the other evidence and information to produce the submission version Local Plan. Further changes to address specific issues raised by neighbouring authorities in response to the submission consultation are also proposed as modifications.

- 2.15 The Local Plan has been prepared with the continual adaptation of policy approaches based on clear understanding of technical evidence and joint responsibilities as this has emerged.
- 2.16 In addition, a crucial element of ensuring the preparation of the Local Plan meets the Duty to Cooperate has been ensuring good internal Member involvement. This has included reporting the Duty to Cooperate responsibility and progress regularly to the Local Plan Working Group as part of its considerations of the challenges for the Local Plan. Establishing a high level of member understanding of the responsibilities of Crawley in relation to joint working has ensured difficult decisions regarding allocation of sites for development and critically re-assessing areas of protective designations (including Historic Parks and Gardens and open spaces) have been considered seriously. The involvement of Portfolio Holders, Leaders and Chief Executives throughout the process has ensured the responsibilities have been met in a coordinated, positive and constructive manner.

3. Framework for Cooperation

- 3.1 Following the announcement of the revocation of regional plans and the indications relating to the introduction of the Duty to Cooperate through the Localism Bill and the consultation draft National Planning Policy Framework in 2011, the framework for ensuring continual and effective engagement and cooperation throughout the development of the Local Plan to address the cross-boundary strategic issues was left for local authorities to develop as they considered appropriate to fit the needs of their area(s).
- 3.2 For Crawley, at that stage, the borough's central role in the Gatwick Diamond was understood and appreciated and therefore the structures already in place supporting cooperative working across this geographic area were considered to form an appropriate basis on which to progress. The framework of the Gatwick Diamond offered additional cross-county linkages which is particularly important to Crawley's location on the northern boundary of West Sussex. Alongside this, established county-wide groups involving the West Sussex authorities retained connections and cooperation with coastal West Sussex districts.
- 3.3 The structure of both the Gatwick Diamond and West Sussex organisations involve meetings at both member and senior officer levels. The following table sets out the three main groups in which Crawley has been an active member in establishing a framework in which to address strategic needs and achieve cooperation.

	Scope	Members
Gatwick Diamond Initiative	<p>Established in 2003. A business led private/public sector partnership; consisting of Businesses, Leaders, Portfolio Holders, & Officers. Meetings are held at:</p> <ul style="list-style-type: none"> • Gatwick Diamond Initiative – consisting of representatives from the councils and businesses across the Diamond. • Gatwick Diamond Local Authority Members – Portfolio Holders for Planning at Gatwick Diamond Authorities. • Gatwick Diamond GROW Strategy Project Group – Planning Policy Managers from Gatwick Diamond Authorities. 	<p>Epsom and Ewell District Council Crawley Borough Council Horsham District Council Mid Sussex District Council Mole Valley District Council Reigate & Banstead Borough Council Surrey County Council Tandridge District Council West Sussex County Council Business Representations</p>
West Sussex	<p>There are a number of very well established West Sussex county wide groupings, of particular relevance to the Local Plan has been:</p> <ul style="list-style-type: none"> • Leaders and Chief Executives of West Sussex County Council and District and Borough Councils. • Joint Planning Board – consists of Cabinet members responsible for planning and senior officers, and acts as a political forum to discuss issues relating to Duty to Cooperate and other joint planning issues within the County. The work includes the relationship between the highways 	<p>Adur & Worthing Councils Arun District Council Brighton and Hove City Council Chichester District Council Crawley Borough Council East Sussex County Council Horsham District Council Lewes District Council Mid Sussex District Council South Downs National Park Authority West Sussex County Council</p>

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

	Scope	Members
	<p>authority (West Sussex County Council) and the planning authorities.</p> <ul style="list-style-type: none"> • Chief Planning Officers Group – support the work of the Joint Planning Board and the agenda reflects that of the member group. • Planning Policy Officers Group – undertakes the work on behalf of the Chief Planners Group. The Duty to Cooperate is a standing item on the agenda. • Issue-focus Groups including West Sussex Strategic Flood Risk Management Board and Group. 	
Northern West Sussex Authorities	<p>There is a long history of joint working between the three Local Authorities located in the Strategic Housing Market Area which has been identified as covering the northern half of West Sussex, distinct from that of the West Sussex Coastal Authorities.</p> <p>Meetings and discussions have taken place between Leaders, Chief Executives, Portfolio Holders, Chief Planning Officers and Planning Officers.</p> <p>A number of joint evidence studies have been commissioned, including: Strategic Housing Market Area Assessment and its updates, At Crawley Study, New Market Town Study, Employment Land Review, and Economic Growth Study, Strategic Sites/Broad Locations joint SHLAA Appendix.</p>	<p>Crawley Borough Council Horsham District Council Mid Sussex District Council</p>

- 3.4 There is also a long-established and formal working relationship set out in a S106 Agreement and accompanying Memorandum of Understanding between the district and county councils affected by Gatwick Airport. As this framework relates to one specific, albeit highly complex issue, it is covered in the Gatwick section, Issue D, below.
- 3.5 The expansion and adaptation of these groupings has taken place as understanding of the different critical strategic issues has increased. For example, emerging information about the difficulties the Coastal West Sussex Authorities were having in meeting their housing needs has led to increased cooperation between the Gatwick Diamond and the northern West Sussex Authorities with the Coastal Authorities. This has been particularly effective though the Coast to Capital Local Enterprise Partnership (LEP) framework (see Figure 2 below). Some other issues have needed tailored groupings either to consider a specific matter in more detail or because the geographic nature of the issue differs from the county or economic functional areas.
- 3.6 Some groups and joint working predate the introduction of the Duty to Cooperate, but have proved effective in securing positive outcomes from cooperation for the preparation of the Local Plan.

Coast to Capital Area Local Partnerships

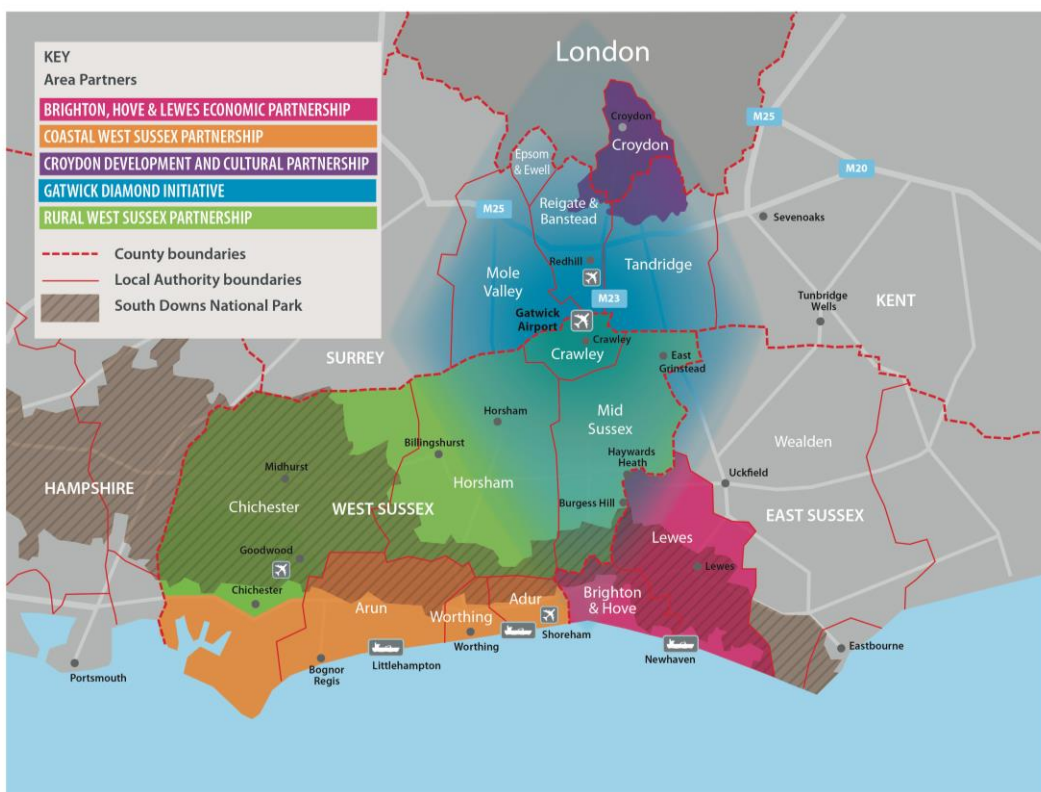


Figure 2: Area Partnerships within the Coast to Capital Local Enterprise Partnership area

Source: Coast to Capital Local Enterprise Partnership Strategic Economic Plan (March, 2014)

3.7 The council has been engaged in developing the Local Plan since 2009 (originally as a review to the Core Strategy). A number of formal stages of consultation have been undertaken throughout this process, and are summarised below.

Issues & Options (Core Strategy Review)	May 2009
Issues & Options: Crawley 2029	19 January – 1 March 2012
Preferred Strategy Local Plan	22 October – 3 December 2012
Preferred Strategy: Additional Sites	3 June – 1 July 2013
Proposed Submission Local Plan	1 September – 13 October 2014

3.8 As part of these formal consultation stages all statutory consultees (listed in Appendix C) were formally notified of the consultation and the relevant documentation associated with the preparation of the Local Plan at each stage.

3.9 In addition, in advance of the Crawley 2029 Issues and Option stage in early 2011, it was considered that engagement with the above organisations should not be limited or restricted to the formal consultation periods. As new issues emerged active engagement through the sharing of information and meetings sought to resolve these, and clarify the position for the Local Plan.

3.10 A wide range of meetings have taken place within the framework of cooperation established between Crawley and its wider neighbours as set out in Appendix D: Strategic Joint Working Mechanisms. The work, discussions and conclusions

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

of these meetings has influenced the preparation of the Local Plan, as explained in the Issues sections. The main bodies are set out below:

- Gatwick Diamond Initiative; Gatwick Diamond Local Authorities
- Coast to Capital Local Enterprise Partnership
- West Sussex Joint Planning Board; Chief Planning Officers Group; Planning Policy Officers Group, and issue based groupings.
- Northern West Sussex Authorities
- Gatwick Airport Groups: Gatwick Airport Consultative Committee; Gatwick Airport Noise and Track Monitoring Advisory Group; Gatwick Joint Local Authorities Group; Gatwick Officers Group: supporting GJLA and GATCOM; Gatwick Airport Transport Forum
- Upper River Mole Strategy Working Group
- Gatwick Greenspace Partnership

3.11 It is recognised that some issues arise which do not fit into the remit of established groupings set out above, or which need the more focused attention of a smaller group, and Crawley Borough Council has taken a flexible and responsive approach to addressing strategic and cross-boundary issues. This has included 1-1 meetings and discussions with individual authorities and bodies where the matter can be effectively dealt with outside of wider groupings, and also attending discussions with much wider groupings where the issues being raised go beyond the geographical limits of established groups.

3.12 In relation to the 1-1 meetings, these have been particularly effective and relevant for the following areas and issues:

- Horsham District Council: housing numbers, strategic development sites. Joint evidence documents have been commissioned between the two authorities, including the recent Viability (CIL and Affordable Housing) study. A Joint Area Action Plan (for the new Kilnwood Vale Neighbourhood – now currently under construction) was prepared and adopted by both Authorities;
- Reigate and Banstead Borough Council: housing numbers, strategic employment growth, retail, Gypsy, Travellers and Travelling Showpeople's needs;
- Mid Sussex District Council: housing numbers, transport infrastructure, economic growth, Gypsy, Traveller, and Travelling Showpeople;
- Mole Valley District Council: housing needs and constraints – green belt, Gatwick, noise, flooding, transport infrastructure; Gypsy, Travellers and Travelling Showpeople's needs; London pressures;
- Copthorne Parish Council: Neighbourhood Plan, strategic development site adjoining Crawley, transport, wastewater, education and health infrastructure;
- Slaugham Parish Council: Neighbourhood Plan, infrastructure, coalescence of settlements and residential development;
- Gatwick Airport: second runway potential: safeguarded land status and associated noise contours, parking, non-airport-related employment use within the airport boundary;
- Environment Agency: Strategic and Local Flooding issues;
- Thames Water: wastewater treatment infrastructure.

3.13 Crawley has also been invited to attend discussions to consider not only matters arising from within Crawley but also those arising from outside of the borough affecting other authority areas and the implications and opportunities Crawley can offer. These requests have been varied and at different times,

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

although many follow similar themes. Crawley has either attended each meeting or agreed representation via Mid Sussex or Horsham District Council officers for follow-on meetings in areas geographically distant from Crawley such as Guildford and Brighton and Hove, and has sought to remain engaged in the discussions taking place.

- 3.14 The meetings which have taken place are not conclusive, with further meetings programmed or mechanisms for progression identified. Key outcomes from these discussions so far have highlighted those local authorities with similar constraints faced by Crawley, the importance of identifying solutions to meeting housing needs, transportation linkages, and economic growth, reflecting similar strategic issues to those identified for Crawley. Recently, these have involved:

Duty to Cooperate Workshops and Meetings		
Adur and Worthing	Purpose	To share information relating to needs and constraints across the local authority areas and to address the outcomes of the Coastal Sussex Duty to Cooperate housing needs study, including the need to recommendation for working with the Local Planning Authorities to the north of the Coastal districts, and the forthcoming Coastal West Sussex Local Strategic Statement.
	Invitees	Adur and Worthing Councils, Arun District Council, Brighton and Hove City Council, Chichester District Council, Crawley Borough Council, Horsham District Council, Lewes District Council, Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council
	Outputs	Initial meeting, setting out positions at that time, and follow-on, more detailed, meeting held. Furthering understanding of current options and emerging evidence.
Brighton and Hove	Purpose	Formally requesting adjoining planning authorities to consider the extent to which they are able to assist in meeting the City's housing requirements.
	Invitees	Adur and Worthing Councils, Brighton and Hove City Council, Crawley Borough Council, Eastbourne Borough Council, East Sussex County Council, Horsham District Council, Lewes District Council, Mid Sussex District Council, South Downs National Park Authority, Wealden District Council, West Sussex County Council
	Outputs	Provision of Housing – A Statement of Common Ground signed by authorities.
Horsham District	Purpose	To understand the key strategic issues for Horsham and the wider area and invited local authorities and the extent of Prescribed Bodies affected.
	Invitees	Adur and Worthing Councils, Brighton and Hove City Council, Chichester District Council, Coast to Capital LEP, Crawley Borough Council, Epsom and Ewell Borough Council, Gatwick Diamond Initiative, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, South Downs National Park Authority, Southern Water, Surrey County Council, Tandridge District Council, Thames Water, Waverley Borough Council, West Sussex County Council
	Outputs	Three separate Duty to Cooperate Workshops run by Planning Advisory Service (PAS) – the final one including attendance by Members. Horsham Duty to Cooperate Report.
Guildford Borough	Purpose	To understand the key strategic issues for Guildford and invited local authority areas and the extent of Prescribed Bodies affected.
	Invitees	Epsom and Ewell Borough Council; Elmbridge Borough Council; Horsham District Council; Mid Sussex District Council; Mole Valley District Council; Reigate and Banstead Borough Council;

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Duty to Cooperate Workshops and Meetings		
		Runnymede Borough Council; Spelthorne Borough Council; Surrey County Council; Tandridge District Council; Waverley Borough Council; Woking Borough Council.
	Outputs	Furthering understanding of current strategic issues arising across wider Surrey and emerging implications between West Sussex.

Documents Establishing Agreed Framework

3.15 Whilst the information within the detailed sections below relating to each issue pulls out the critical outcomes and agreements; the key documents currently agreed setting out the framework for undertaking the duty to cooperate and joint working arrangements are listed below:

- **Gatwick Diamond Local Strategic Statement (2012)**
Between Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Surrey County Council, and West Sussex County Council.
- **Gatwick Diamond Memorandum of Understanding (2012)**
Between Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Surrey County Council, Tandridge District Council and West Sussex County Council.
- **Northern West Sussex Position Statement (Revised July 2014)**
Between Crawley Borough Council, Horsham District Council, and Mid Sussex District Council.
Prepared and updated to support MSDC/HDC examinations. This document is anticipated for further update following additional working being carried out within the Mid Sussex District regarding strategic sites and capacity, and following the release of updated household projections from the DCLG.
- **Horsham District Council & 'Coast to Capital' LEP Authorities (March 2013) Incorporating Strategic Issues into Local Plans – Summary Report of Duty to Cooperate Workshops**
Prepared to support HDC examination.
- **RBBC and CBC Statement of Common Ground on meeting strategic housing needs (2013)**
Between Reigate and Banstead Borough Council and Crawley Borough Council.
Prepared for RBBC examination.
- **RBBC and CBC Statement of Common Ground on meeting the Duty to Co-operate and Retail issues relating to Reigate & Banstead Borough Council Draft Core Strategy (2012)**
Between Reigate and Banstead Borough Council and Crawley Borough Council.
Prepared for RBBC examination.
- **Duty to Cooperate: Statement of Common Ground; Cross-boundary working and meeting housing needs (2014)**
Between Lewes District Council, South Downs National Park Authority, Adur District Council, Arun District Council, Brighton and Hove City Council, Chichester District Council, Crawley Borough Council, Eastbourne Borough Council, Hastings Borough Council, Horsham District Council, Mid Sussex

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

District Council, Rother District Council, Wealden District Council, Worthing Borough Council.

Prepared for LDC examination.

- **Provision of Housing – A Statement of Common Ground (2013)**
Between Adur District Council, Arun District Council, Brighton and Hove City Council, Chichester District Council, Crawley Borough Council, Eastbourne Borough Council, Horsham District Council, Lewes District Council, Mid Sussex District Council, South Downs National Park Authority, Wealden District Council and Worthing Borough Council.
Prepared for BHCC examination.
- **Gatwick Airport Memorandum of Understanding and S106 Agreement (2008)**
Between Crawley Borough Council, East Sussex County Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Surrey County Council, Tandridge District Council, West Sussex County Council.
Originally agreed in 2001, and subsequently updated with the latest agreed in 2008.
- **Local Flood Risk Management Strategy 2013 – 2018**
Identifies the responsibilities for flooding within the county and enables a range of organisations to work together to improve the management of flood risk.
Between Adur District Council, Arun District Council, Crawley Borough Council, Chichester District Council, Horsham District Council, Mid Sussex District Council, Worthing Borough Council, South East Coastal Group, West Sussex County Council, Environment Agency, Southern Water.

Issue A: Meeting Housing Needs

Extent of the Issue

- A.1 Crawley is a New Town with tight administrative boundaries. Due to the age profile of the town and its residents, it has a high housing demand arising from the existing population. Based on Crawley's independent evidence base, it is contended that Crawley's objectively assessed housing need is driven by its baseline demographic change, which would require housing at the levels anticipated by the ONS assumptions and projections. Housing at this level would continue to meet the economic needs of the town, as the population projections are primarily caused by the positive natural change of births exceeding deaths over the Plan period, and exceed that projected to be needed to meet economic growth needs.
- A.2 Over the Plan period (2015 – 2030) this equates to a total objectively assessed housing need arising from Crawley of **8,100 net new dwellings**.
- A.3 Crawley's development as a series of comprehensive planned neighbourhoods, many of which have also accommodated a significant amount of infill housing in the last decade, means that the capacity of the built up area to accommodate further housing is limited. The planned areas of open space (both formal and informal) within the neighbourhoods are highly valued by local residents for their amenity and recreational value, as evidenced by consultation responses to Issues and Options, Preferred Strategy and Additional Sites Consultation, and through an independent open space study. The tight relationship between the Built-up Area Boundary and the borough's administrative boundary further limits capacity. The need to safeguard land for a potential second runway at Gatwick Airport together with the noise contours associated with both a single and potential two runway scenario significantly limits the potential for additional housing in the northern parts of the borough.
- A.4 Construction has commenced on two new neighbourhoods, created as urban extensions to the existing built up area of the town. These neighbourhoods reflect the commitment of the borough and its neighbouring authorities to seek to meet as much of the development needs arising from the town within or as close to Crawley where this constitutes sustainable development and where sufficient infrastructure capacity allows. The identification of the two neighbourhoods followed extensive evidence gathering and formal planning procedures. One of the neighbourhoods lies within the borough's administrative boundaries (Forge Wood, 1,900 dwellings) and the other falls outside within Horsham District Council's administrative boundaries (Kilnwood Vale, 2,500 dwellings).
- A.5 Taking into account the suitability, availability, achievability and deliverability of housing sites within the borough, Crawley's Strategic Housing Land Availability Assessment (SHLAA)⁴ has identified a housing land supply which provides a total of 5,350 dwellings (over the period 2013/14 – 2029/30), including 5,010 over the Plan period (2015 – 2030). This includes the development of Forge Wood but excludes Kilnwood Vale (the housing associated with which is identified in Horsham District's SHLAA).

⁴ Crawley Strategic Housing Land Availability Assessment (CBC, November 2014) and Housing Trajectory (CBC, September 2014)

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

- A.6 This housing land supply meets approximately 60% the total objectively assessed housing need and **results in a shortfall of around 3,120 dwellings over the Plan period.**

Nature of Cooperation

- A.7 Crawley's housing market functions within a wider housing market area (HMA), known as the northern West Sussex HMA, which is predominately within the local administrative areas of Crawley Borough, Horsham and Mid Sussex Districts; extending northwards into the administrative area of Reigate and Banstead to a lesser degree. A joint Strategic Housing Market Assessment (SHMA) was commissioned by the three northern West Sussex Authorities (originally in 2009, with subsequent updates in 2012 and 2014)⁵. This evidence highlights the strong relationship between the authority areas as a functional housing market.
- A.8 However, it is also acknowledged that the northern West Sussex HMA does not function independently and the edges between adjoining housing market areas are not clearly defined boundaries; it is also understood that housing market areas operate as a layered system of tiers, and particularly some housing market areas have less clearly identified areas of movement in terms of inter-migration and travel to work. This is the case for the South East overall, and particularly across the Coast to Capital Local Enterprise Partnership (LEP) area. This means that the pressures associated with Coastal Sussex – in particular Brighton and Hove City, and the wider London context must also be taken into account when considering the implications of delivering Crawley's unmet housing needs within its adjoining local authority areas.
- A.9 The matter of under-provision of planned housing against predicted housing needs is one which extends across the south east, with many areas generating higher levels of demographic needs than they can accommodate because of physical, environmental or green belt/National Park constraints: including London, Brighton and Hove, Adur, Worthing, Hastings and Lewes in addition to Crawley. This is further exacerbated by the strong economic base and the attraction of the region resulting in high levels of in-migration.
- A.10 On-going detailed discussions about housing continue through a variety of existing and adapted joint working arrangements, including:
- one-to-one between adjoining authorities⁶;
 - northern West Sussex authorities (at officer, Chief Executive, Portfolio Holder and Leaders levels);
 - Gatwick Diamond Authorities (at officer, Chief Executive, Portfolio Holder and Leaders levels);
 - West Sussex Leaders and Chief Executives, and Joint Planning Board (Members meetings of Portfolio Holders for planning across the county area; supported by meetings between the Chief Planning Officers, and Planning Policy Officers);

⁵ Northern West Sussex Strategic Housing Market Area Assessment, Final Report March 2009 (GVA Grimley, 2009); Northern West Sussex – Crawley/Horsham/Mid Sussex; Strategic Housing Market Assessment Update, October 2012 (GVA, 2012); Northern West Sussex Housing Market Area Affordable Housing Needs Model Update, October 2014 (Chilmark Consulting Ltd, 2014)

⁶ including CBC and Reigate and Banstead Borough Council; CBC and Horsham District Council; CBC and Mid Sussex District Council, and including Worth Parish Council representation particularly in relation to progression of the Copthorne Neighbourhood Plan and potential urban extension(s) on the eastern side of Crawley.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

- meetings between northern and Coastal West Sussex (including the South Downs National Park Authority, Brighton and Hove City Council and Lewes District Council); and
- broadening out of involvement where it has been understood to be necessary or relevant (such as Horsham's meetings including Waverley Borough Council and Guildford's meeting including the remainder of Surrey Authorities and Hampshire County Council).

A.11 The importance of accommodating the demographic needs within the Gatwick Diamond was acknowledged in the Gatwick Diamond Local Strategic Statement (paragraphs 5.6 and 5.7). The issue of Crawley's inability to meet all of its housing need was raised early in discussions with neighbouring authorities through the Gatwick Diamond partnership⁷.

A.12 Crawley's constrained position has been a clear concern of the Local Plan from its commencement as the Core Strategy Review. In 2009 Topic Paper 1 set out the challenges and consequences of meeting the South East Plan housing requirements – at least 7,500 dwellings from 2006 to 2026. At that stage the delivery of the North East Sector neighbourhood (now known as Forge Wood) within Crawley was not certain because of the outstanding appeals and uncertainty regarding a second runway at Gatwick Airport, and the topic paper suggested three scenarios for the development strategy of the Plan:

Scenario 1: A sub region with a South East regional focus

Scenario 2: A sub regional focus

Scenario 3: Crawley Borough Focus

In addition, this Topic Paper anticipated that "West of Bewbush and possibly up to two further neighbourhoods may have been developed, or be under construction, possibly including the North East Sector". The Housing Topic Paper at that same time further considered detailed questions regarding "at Crawley" potential extensions and how far this should contribute towards meeting Crawley's housing needs. These topic papers formed part of the Issues and Options Consultation and were shared and discussed with neighbouring authorities several of which recognised that Crawley's needs could not be met within its boundaries.

A.13 In 2011, in light of the anticipated revocation of regional plans, Crawley commissioned NLP Consultancy to undertake a detailed assessment of housing needs for the borough. This indicated demographic objectively assessed housing needs levels above those set out in the South East Plan suggesting the South East Plan had taken the constrained nature of the borough into account in distributing housing numbers across the region. Despite Forge Wood (the North East Sector) receiving planning permission, the ability of the new Local Plan to meet the level set out in the South East Plan or the higher need figure within its constrained boundaries became increasingly unrealistic. A significant proportion had been anticipated to come forward through the previously proposed Town Centre North development (originally anticipated in the Core Strategy at 800 dwellings) but this level of residential within the scheme was demonstrated to be unviable.

A.14 Whilst an actual capacity figure for Crawley's Local Plan was not known at this stage, it was made clear through Gatwick Diamond GROW Strategy Project

⁷ Gatwick Diamond Strategy Project Group, 17 April 2012; Gatwick Diamond Local Authorities Strategic Housing Issues – Towards A Common View Briefing Note for Project Group, Members, Chief Executives and Senior Planners meeting, 7 March 2012; Gatwick Diamond Strategy Project Group, 11 June 2012.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Group (officer-level) meetings, in late 2011, and Members meetings that the demographic figure set out in the NLP study was higher than the South East Plan figure, and, although the council would do everything it could to meet this through its revised land supply studies⁸, it was likely that some of the need would have to be met adjacent to, or beyond, Crawley, requiring joint working to address the unmet need.

- A.15 At the 2012 Issues and Options consultation stage, the Topic Papers were updated and reissued in order to stimulate debate and detailed consideration. Topic Paper 1 set out three similar broad strategic development options to those in 2009. The Housing Topic Paper built upon this, setting out the changes which had occurred since 2009 and highlighting the housing need for the borough and supply constraints. Four broad levels of housing provision were consulted on and the key implications for each level were articulated for considered decisions to begin to be made as part of the early stages of the new Local Plan preparations. As in 2009, neighbouring authorities were closely involved in the consultation and Horsham District Council and Mid Sussex District Council responded specifically with regard to the issue of Crawley's housing need summarised in A.19.
- A.16 In addition to discussions as part of the Gatwick Diamond, Northern West Sussex Authorities, and the West Sussex Authorities, and the formal consultation on the Preferred Strategy document which took place in October – December 2012, as further evidence emerged clarifying the extent of Crawley's unmet need, CBC included this in all its formal representations to neighbouring authorities' planning documents⁹ and through correspondence between CBC and Brighton and Hove City Council.
- A.17 A December 2013 draft version of this Duty to Cooperate Statement was circulated to all prescribed bodies set out in Appendix C (local authorities, agencies and infrastructure providers); the comments made to this are set out in Appendix E along with the council's response.
- A.18 In order to formalise the detailed discussions already taking place across the northern West Sussex, West Sussex (including Coastal West Sussex) and Gatwick Diamond, each of the neighbouring authorities (including those authorities which do not share a boundary with Crawley directly, but do share a boundary with the northern West Sussex Housing Market Area) were formally notified of Crawley's constrained position and current understanding of objectively assessed development needs (both housing and employment land)¹⁰; see Appendix F: Crawley Borough Council Duty to Cooperate Request (August 2014). This clearly set out the identified unmet need arising from within Crawley over the Plan period, and asked whether this could be met outside of the borough's boundaries. At the same time as this, the draft Crawley Borough Council Duty to Cooperate Statement (August 2014) was circulated to all prescribed bodies set out in Appendix C (local authorities, agencies and

⁸ Crawley Urban Capacity Study (CBC, 2014)

⁹ Formal notification of Crawley's shortfall in meeting housing need:

- CBC representation to Reigate & Banstead Core Strategy Proposed Submission (March 2012);
- CBC response to Mid Sussex District Plan Consultation Document (January 2012);
- CBC representation to Mid Sussex Proposed Submission District Plan (June 2013);
- CBC representation to Horsham District Planning Framework Consultation (April 2012);
- CBC representation to Horsham District Planning Framework Preferred Strategy (October 2013);
- CBC representation to Horsham District Planning Framework Submission Consultation (June 2014).

¹⁰ CBC letter to Prescribed Bodies, 20 August 2014.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

infrastructure providers) for their final comments ahead of the formal, statutory stage of consultation on the submission Local Plan. The draft Duty to Cooperate Statement was published alongside the Local Plan as part of the supporting evidence for the public consultation (1 September – 13 October 2014).

A.19 Responses have been received from the following authorities each setting out their position (see Appendix G: Local Authority Responses to CBC Duty to Cooperate request):

- Adur and Worthing Councils
- Arun District Council
- Chichester District Council
- Guildford District Council
- Lewes District Council
- Mid Sussex District Council
- Mole Valley District Council
- Reigate and Banstead Borough Council
- Tandridge District Council

Each council that responded appreciated the constraints in Crawley and broadly accepted that Crawley could not meet its own employment and housing needs. However, no authority suggested the unmet need could be addressed through development in its area.

A.20 Authorities Involved

Northern West Sussex Authorities:	Crawley Borough Council Horsham District Council Mid Sussex District Council
Gatwick Diamond East Surrey Authorities:	Epsom and Ewell Borough Council Mole Valley District Council Reigate and Banstead Borough Council Tandridge District Council
Coastal West Sussex Authorities:	Adur District Council Arun District Council Brighton and Hove City Council Chichester District Council Lewes District Council South Downs National Park Authority Worthing Borough Council
County Councils:	East Sussex County Council Surrey County Council West Sussex County Council
Wider Surrey & London Authorities:	London Borough of Croydon Guildford Borough Council Waverley Borough Council

Outcomes from Cooperation & Resolution of Issue

Crawley Local Plan

A.21 Crawley's Local Plan clearly acknowledges the high need for housing in the borough, and has been based on critical consideration of all possible opportunities for meeting its own internally generated housing needs.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

- A.22 The supply-led nature of the Local Plan housing approach and the endeavour to meet needs as far as possible can be demonstrated through the changing housing figure at every stage of the Plan's development:
- The 2009 Topic Paper questions whether the Plan should be seeking to exceed the South East Plan figure (through urban extensions); meet the South East Plan figure (with urban extensions); or, if the North East Sector appeal decision dismissed the application, then deduct the North East Sector capacity from the South East Plan figure.
 - The 2012 Housing Topic Paper sets out the implications of four bands of housing development levels.
 - Responses from neighbouring authorities at the issues and options stages clearly indicated awareness of the high level of need in Crawley, and the importance of Crawley maximising its own housing land supply.
 - The preferred strategy document consulted on the supply-led approach, with the Plan making provision for 3,543 net dwellings based upon the whole housing trajectory of sites for the Plan period, but excluding windfalls.
 - Responses from neighbouring authorities at the preferred strategy stage reflected the progress made through the joint working: acknowledging the high level of housing need generated by Crawley's demographic projections, the constraints of the borough and supporting Crawley in the supply-led approach whilst continuing to challenge the council to ensure the maximum capacity within the borough boundary is identified.
 - The Additional Sites Consultation considered further potential sites to increase capacity within the borough, including controversial public open space sites, and this has been taken into account in preparing the Submission Local Plan which sets a supply-led figure of 5,000 net dwellings, based on the whole housing trajectory of sites for the Plan period and including an element for windfalls.
- A.23 Work undertaken by the council to ensure it meets its responsibilities to maximise the opportunities to address Crawley's housing needs within the borough's administrative boundaries have included an Urban Capacity Study and a thorough review of the SHLAA – reconsidering all previously-assumed policy constraints; a review of the 2007 open space study¹¹; review of the Built-Up Area Boundary¹²; and a review of the 2009/10 Employment Land Review¹³. Consultation was then undertaken on a number of sites to consider their potential for additional housing development, this included open space sites, employment sites and sites outside of the Built-up Area Boundary.
- A.24 Further work was also undertaken on the capacity of known housing sites to ensure each site's potential to maximise delivery of housing would be realised.
- A.25 Full details of the approach taken to housing land supply within the borough for the Local Plan is set out in Topic Paper 3: Housing Land Supply (CBC, 2014).

Urban Extensions to Crawley

- A.26 One-to-one discussions have continued with neighbouring authorities and relevant developers/landowner consortiums to positively explore further potential urban extensions immediately adjacent to the Crawley urban area. In the past this has been effective with the Joint Area Action Plan for West of

¹¹ Crawley Open Space Study (JPC Strategic Planning and Leisure Limited, 2013) and Crawley Playing Pitch Assessment (JPC Strategic Planning and Leisure Limited, 2013)

¹² Crawley Built Up Area Boundary Review (CBC, 2012)

¹³ Northern West Sussex Economic Growth Assessment (NLP, 2014)

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Crawley being prepared jointly and adopted by both Crawley Borough and Horsham District Councils and resulting in the new Kilnwood Vale neighbourhood which has outline consent for 2,500 dwellings. The first phase of this development is under construction with some homes now occupied. There is also a joint agreement for CBC to have 50% of the nomination rights for the affordable housing within the development, helping to address the affordable housing need within Crawley.

- A.27 An outline application has recently been permitted by Mid Sussex District Council for a 500 dwelling development adjoining Crawley's eastern boundary to the west of Copthorne.
- A.28 Recognition of the significance of the High Weald AONB landscape precludes consideration of any major extension of Crawley to the south and safeguarding and aircraft noise constraints to the north mean the focus for consideration of possible urban extensions is to the east and west.
- A.29 This evidence has continued to inform the positive discussions between the authorities, including consideration of the infrastructure capacity and environmental constraints of further urban extensions to the east and west of the borough:
- West of Ifield: Joint meetings have been held over a number of years with the West of Ifield developer consortium and Crawley Borough, Horsham District and West Sussex County Councils to consider the potential for development in this location and the associated constraints and opportunities. Whilst substantial progress has been made, agreement has not been reached that this would constitute the most sustainable location for strategic development, particularly when taking into account the quantum of development already planned for to the west of Crawley and north/east of Horsham in the short-medium term. In addition, development impacts particularly the cumulative impacts on transport network, flooding (both fluvial and surface water) and other infrastructure (including capacity of the Sewage Treatment Works and secondary schooling) have not been resolved. The site is not being promoted by Horsham's District Planning Framework for this Plan period.
 - Crabbet Park: Whilst this scheme was proposed by a developer in 2008, it has not subsequently been promoted. The waste water infrastructure constraints pose a significant viability constraint to the progression of substantial development in this location.
 - Pease Pottage: this site is located in the High Weald Area of Outstanding Natural Beauty, and has subsequently been considered inappropriate for major development through the Mid Sussex District Council's Sustainability Appraisal and SHLAA process, alongside discussions with Crawley Borough Council. However, a number of appeals for smaller sites adjacent to Pease Pottage in the AONB have recently been allowed.

Strategic Sites Elsewhere in the northern West Sussex Housing Market Area

- A.30 Evidence to explore strategic housing delivery options and opportunities within the wider Northern West Sussex area has been jointly commissioned by Crawley, Horsham and Mid Sussex Councils including the At Crawley Study, the New Market Town Study¹⁴, and the Bio City Study¹⁵. More recently, joint work has progressed between the three northern West Sussex Authorities to

¹⁴ jointly commissioned by Crawley Borough Council, Horsham District Council and Mid Sussex District Council

¹⁵ jointly commissioned by Crawley Borough Council, Horsham District Council and West Sussex County Council (2011)

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

identify the strategic sites and broad housing locations across the Housing Market Area within the administrative boundaries of Crawley, Horsham and Mid Sussex, which is set out in a shared appendix to each authority's SHLAA¹⁶. This has been accompanied by further exploration into the infrastructure capacity of Crawley to accommodate expansion beyond that recommended by the At Crawley Study, 2009¹⁷.

- A.31 The Local Plan reflects the outcomes of all of the above work and acknowledges the shortfall between the objectively assessed need and the minimum anticipated supply-led housing delivery figure set within the Policy and therefore the need to work with neighbouring authorities.

Supporting Agreements

- A.32 RBBC and CBC Statement of Common Ground on Meeting Strategic Housing Needs (2013):

Acknowledgement that the Reigate and Banstead housing figure reflects the level of constraint within that borough, but in providing for some in-migration as well as internally generated natural change the housing would contribute towards meeting unmet needs of other local authorities including those within the wider East Surrey and North West Sussex HMA (RBBC & CBC Statement of Common Ground on meeting strategic housing needs, 2013, paragraph 5.3).

"The borough is planning for the provision of a total of at least 6,900 homes over the plan period from 2012-2027, equivalent to an annual average provision of 460 homes per year..."

"This amount of housing recognises the need to provide homes for local people and to support economic growth. It provides for internally-generated natural change and some continuing net in-migration to the borough which would contribute towards meeting unmet needs of other local authorities including those within the wider East Surrey and North West Sussex HMAs..."
(RBBC Core Strategy paragraphs 7.4.1 – 7.4.4, 2013)

- A.33 Northern West Sussex Authorities Position Statement (Revised July 2014):
It is recognised that Crawley is doing all it can to maximise its capacity for housing development within the borough boundaries and thereby reducing the shortfall across the Housing Market Area (NWS Position Statement Update, July 2014, para. 6.13).

Agreement has been reached across wider Housing Market Area to seek to meet needs as a whole, taking into account local constraints, local aspirations and the need for sustainable development, and, having assessed the ability of its area, each authority considers it is doing the maximum reasonable to meet

¹⁶ Crawley Strategic Housing Land Availability Assessment, Appendix K: Strategic Housing Sites (Broad Locations of Search) within the Northern West Sussex Housing Market Area (CBC/HDC/MSDC, 2014)

¹⁷ CBC Infrastructure Position Statements and 'At Crawley' sites infrastructure updates:

- CBC letter, 4 August 2014;
- Highways Agency, email 5 September 2014;
- Southern Water, email 15 September 2014;
- Sussex Police, letter 28 August 2014;
- Network Rail, Position Statement 5 August 2014;
- Gatwick Airport, letter 23 September 2014
- Environment Agency, letter 9 September 2014;
- Thames Water Utilities Ltd., letter 5 September 2014
- West Sussex County Council Local Education Authority, Position Statement September 2014;
- West Sussex County Council Waste and Recycling, Position Statement August 2014;
- NHS 5 Communities Executive Summary 2014/15: consultation Plan for Crawley, Horsham and Mid Sussex CCGs.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

the objectively assessed housing needs of the area as a whole (NWS Position Statement Update, July 2014, para. 6.16).

A.34 The Horsham District Planning Framework (May 2014) includes the following acknowledgement in its supporting text:

“...460 homes per year would be needed to allow for population change, household change and maintain the same size workforce...;”

“...560 homes per year is the lowest level of housing that would be needed to allow for population and household change as well as economic growth...;”

“...For this reason, a figure of 650 homes per year has been proposed as a housing target to allow for increases in the population, support economic growth and also to support the wider economy of Gatwick Diamond...”

(Horsham District Planning Framework, paragraph 6.3, May 2014).

“...The significant growth required by nearby Crawley has been accommodated in its boundaries in the past, as well as in the new neighbourhood of Kilnwood Vale, which is located in Horsham District. Over the next 10 years, Crawley will be reaching its capacity within its boundary which is drawn tightly around the town. Under the Duty to Cooperate Horsham District has sought to plan for growth from these constrained areas. This will maintain, as far as possible the ability to accommodate growth by continuing to plan for in-migration which reflects the key functional linkages between where people live and work within the District and the housing market areas beyond the District boundary. This will contribute to meeting the housing need of other local authorities including those generated by London” (Horsham District Planning Framework, paragraph 6.6, May 2014).

Outstanding Issue & Ongoing Cooperation

A.35 As set out in the Northern West Sussex Position Statement (Revised July 2014), the combined objectively assessed housing need across the housing market area exceeds the anticipated delivery levels set out by the three Northern West Sussex Authorities (see Table 1 extract below). The delivery figure reflects the supply-led constrained position of Crawley Borough, and the market delivery reality and the need to meet sustainability objectives within Horsham and Mid Sussex Districts. The proposed housing provision will be tested at each individual local authority’s Local Plan Examination to ensure it is sound and reflects the maximum sustainable development considered achievable within each administrative area.

Table 1: Objectively Assessed Housing Needs and proposed housing provision (per annum) – Northern West Sussex Authorities

	Mid Sussex	Crawley	Horsham	TOTAL
Objectively Assessed Need	516dpa	535dpa	560dpa	1,611dpa
Proposed Housing Provision	530dpa	326dpa	650dpa	1,506dpa

A.36 Whilst some of the shortfall may be able to be met within the southern part of Reigate and Banstead (particularly in the Horley area) this is not anticipated to meet the full unmet objectively assessed need for the Northern West Sussex Housing Market Area given the level of constraint in Reigate and Banstead and the characteristics of the East Surrey and North West Sussex HMAs.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

- A.37 At the point of understanding the quantum of unmet need across the Housing Market Area pressure was also being placed on Mid Sussex and Horsham Districts from the Coastal Authorities to help meet their housing needs, and emerging indications from the Gatwick Diamond Surrey Authorities are suggesting potential higher levels of housing need from their own areas and uncertainty around future need arising from London.
- A38 All authorities involved are also already aware of Crawley's shortfall in delivering housing against its objectively assessed needs and the nature of its constraints. Discussions have widened out within the existing framework of Cooperation (as set out in section 3) for, initially, understanding and sharing of information and to consider the strategic options for meeting the needs over the longer term to ensure decisions made are truly deliverable and sustainable.
- Action: Ongoing discussions are necessary between Crawley and its adjoining authorities, in relation to the potential for further urban extensions to the borough, in particular to assess any new evidence in relation to infrastructure capacity and environmental constraints, and whether such development would constitute the most appropriate longer term sustainable location for strategic development in the context of the development strategies of the Local Plans for the adjoining authorities, in light of the wider housing pressures from the coastal authorities and Surrey/London.**
- Action: Ensuring shared understanding and agreement between all authorities in the wider sub-region to clarify needs and capacity.**
- A.39 The Coastal Sussex Authorities' Duty to Cooperate Housing Study (May 2013) provides an assessment of housing requirements in each authority in the Sussex Coast housing market area, as well as an assessment of housing land supply and capacity in each. The study indicates the implications of a potential shortfall in housing provision across the Sussex Coast area and how this might be addressed.
- A.40 Two further statements of agreement¹⁸ have been prepared between the authorities in Sussex establishing the framework and committing the authorities to ongoing constructive and effective joint working to find longer term solutions to meet housing need. These have followed a number of meetings involving the Northern West Sussex and Coastal Sussex authorities during 2013. The Joint Planning Board agreed in 2013 to extend the membership of this group to include invitations to Brighton and Hove City Council, Lewes District Council and East Sussex County Council to join in order to facilitate strategic discussions to positively direct the delivery of meeting housing needs.
- A.41 Alongside this, Green Belt Districts, such as Tandridge, Guildford and Waverley in Surrey, are also now recognising they have to be able to demonstrate how their housing needs can be met, and acknowledging they are likely to come under increasing pressure from London to help meet the unmet needs of the Capital City. Even though there may be some focused reviews of the Green Belt carried out as part of Local Plan developments, they (and indeed the GLA) may well conclude that not all of these needs can be met without looking further south.
- A.42 Tandridge District Council informed Crawley Borough Council of their intention to commence a Strategic Housing Market Assessment (SHMA) and invited

¹⁸ Duty to Cooperate Agreement for Joint Working (JPB 22 November 2013) and Provision of Housing – A Statement of Common Ground (Brighton & Hove City Council, October 2013)

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Crawley Borough Council to participate in a joint commission. Crawley Borough Council confirmed that, in light of the evidence attached to the letter (which showed a very small interrelationship between Crawley and Tandridge in terms of housing migration – which appeared as a zero net level in the period 2006-11), it was not considered appropriate for Crawley Borough Council to commission a further SHMA jointly with Tandridge District Council. However, it is recognised that overlaps between the Housing Market Areas do occur, and on this basis, the SHMAs should consider links between them. Shared methodology and data in this case is considered would help to ensure compatibility is maintained.

Action: Ensure Crawley plays an active role in discussions with the wider Local Authorities across the adjoining housing market areas (including, but not restricted to, Coastal West Sussex, Northern West Sussex and East Surrey) relating to strategic delivery of meeting housing needs to ensure the needs emerging from the residents within Crawley are reflected in the solutions identified and the outcomes from discussions are sustainable and deliverable.

A.43 The three northern West Sussex authorities are committed to working with the Sussex Coastal HMA to understand how the projected housing shortfall can be reduced and are working with the Coast to Capital LEP to see how barriers and constraints to development particularly in relation to infrastructure requirements, in the Gatwick Diamond and along the Sussex Coast can be removed (NWS Position Statement, Revised July 2014, para. 6.17). For Crawley, this has included providing up-to-date information in relation to progress on the Local Plan; the relationship between housing and economic growth within the borough; and infrastructure needs for delivery of sites to support its emerging Strategic Economic Plan and bids to the Single Local Growth Fund.

Action: The involvement of the Coast to Capital Local Enterprise Partnership is crucial, partially to ensure infrastructure constraints are addressed as far as possible and partially to coordinate an understanding of the physical capacity, opportunities and solutions for the most sustainable forms of development in the longer term.

Issue B: Gypsy, Traveller and Travelling Showpeople

Extent of the Issue

- B.1 The Housing Act 2004 requires all local authorities to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople, take account of their needs in accommodation assessments, and outline how identified needs will be met. Furthermore, the National Planning Policy for Traveller Sites requires that local planning authorities make an assessment of their accommodation needs for the purposes of planning and to develop fair and effective strategies to meet this need through the identification of land for sites.
- B.2 Consideration of meeting the needs of Gypsies, Travellers and Travelling Showpeople is a complex matter, as this covers a variety of geographic, cultural and personal circumstances.
- B.3 Accommodation needs in relation to Spatial Planning can be summarised as including:
- permanent site provision for Gypsies and Travellers (pitch sites)
 - permanent site provision for Travelling Showpeople (plot sites)
 - transit provision for Gypsies and Travellers
 - transit provision for Travelling Showpeople
 - stopping sites provision
 - accommodation for travelling families within 'bricks and mortar' housing.
- B.4 For Crawley, the assessment into the needs of Gypsies, Travellers and Travelling Showpeople within the borough boundaries identified approximately 30 Gypsy, Traveller and Travelling Showpeople households living within Crawley; with 77 individuals identifying themselves as 'White Gypsy or Irish Traveller' within the 2011 Census. There are currently two authorised Gypsy and Traveller sites in Crawley, for four pitches in total, and one authorised site for Travelling Showpeople, with the remainder of the known population living within bricks and mortar accommodation.
- B.5 Whilst the survey work completed for those in bricks and mortar accommodation has not identified any immediate need for additional sites, it is inherently improbable that within the next 15 year period there will be no new households formed requiring additional site provision. Therefore, it is calculated that there may be a potential future need of up to ten permanent pitches for Gypsies and Travellers arising from the existing population within Crawley.
- B.6 The borough is heavily constrained by its administrative boundaries, which in most parts of the borough do not extend significantly beyond the Built-up Area, and the built-up area itself is characterised by a planned urban form with limited capacity for infilling. The presence of Gatwick Airport also renders a significant amount of land in the north of the borough unsuitable for residential development (particularly Gypsy and Traveller accommodation) due to noise constraints; and other areas of land are constrained by flood risk. These factors limit the opportunities for providing suitable sites for permanent caravan accommodation. None of the surveyed Gypsy and Travellers indicated that they owned land which they wished to be considered for a Gypsy and Traveller site.

Nature of Cooperation

- B.7 The issue of meeting the needs of Gypsies and Travellers across the wider area has been acknowledged since before the revocation of the Regional Spatial Strategy (the South East Plan), and is identified in the 2012 timetable

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

set out within the agreed Gatwick Diamond Local Strategic Statement with a priority identified to “*Work together to assess the needs of gypsies, travellers and travelling show people and develop an agreed approach*”.

- B.8 As every authority is able to identify land for housing, and housing land is generally considered appropriate for Gypsy and Traveller pitches¹⁹, it has been agreed across the Gatwick Diamond Authorities that each authority will seek to meet its own Gypsy, Traveller and Travelling Showpeople permanent pitch/plot needs arising from within its own area²⁰. Emerging Local Plans for the adjoining authorities set need requirements for pitch provision to be delivered through detailed local plan, site allocations and development management Development Plan Documents. This option was not considered suitable for Crawley due to the constrained nature of the borough limiting options for land use beyond those identified for allocation and designation within the Local Plan.
- B.9 A similar methodology for assessing the needs has been used, as far as appropriate, for each authority. As the majority of Crawley’s Gypsy and Traveller population reside in bricks and mortar accommodation it was clear from the initial surveys that the methodology suitable for authorities with larger populations on sites in caravan accommodation had limitations which required a more refined approach to ensure the needs were adequately assessed.
- B.10 Crawley Borough Council has been approached by Mid Sussex District, Mole Valley District and Reigate and Banstead Borough Councils in relation to their own work regarding identification of Gypsy and Traveller sites and the sharing of information, particularly where there might have been indications of cross-boundary interest shown by Travelling families. To aid this cooperation, Crawley Borough Council undertook a telephone interview and was one of a wide number of interested stakeholders in attendance at a Mid Sussex-held workshop to understand the movements and requirements of Travellers across the sub-region. The phone interview and the meeting were facilitated by an independent organisation and the meeting included representatives from the Travelling community in Sussex. Each of the neighbouring authorities is currently progressing with a planned approach to meeting the permanent accommodation needs of Gypsies, Travellers and Travelling Showpeople within their districts and boroughs.
- B.10 Joint work has also been undertaken in understanding the issue of transit and ‘stopping’ sites requirements across West Sussex, reflecting the wider geography needed for addressing the requirement in the locations where the sites would truly function as transit provision.

B.11 Authorities Involved

Permanent Sites: Gatwick Diamond Authorities

Transit Sites: West Sussex Authorities

Outcomes from Cooperation & Resolution of Issue

Crawley Local Plan

- B.12 The Crawley Local Plan identifies a site for allocation as a reserve permanent Gypsy and Traveller Site large enough to accommodate up to ten pitches identified to potentially be required by the Needs Assessment survey work. A

¹⁹ Paragraph 11, Planning Policy for Traveller Sites (DCLG, 2012)

²⁰ Gatwick Diamond Local Authority Members Meeting, 16 April 2013

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

modification is also proposed to reference ongoing cross-boundary discussions on this matter.

Identification of Shared Transit Site

B.13 The location of a transit site within West Sussex to meet the needs across the county has been identified through joint working across West Sussex (which has included the West Sussex Police Commission working alongside all of the councils and the National Park Authority). Due to the greater need along the south coast the site has been permitted in Chichester district accessible to the A27 and local amenities. Crawley Borough Council will be an equal partner with all the West Sussex authorities in supporting the capital and revenue costs associated with delivery and management of this site.

Supporting Agreements

B.14 *Gatwick Diamond Local Strategic Statement*

Work together to assess the needs of gypsies, travellers and travelling show people and develop an agreed approach

(Gatwick Diamond Local Strategic Statement, Delivering the Strategic Direction, Delivery Plan, 2012)

B.15 *Gatwick Diamond Local Authorities Members' Meeting, 7 March 2012*

Gypsies and Travellers – Agreed it is important to share information on this. Surrey has a methodology which has been shared with the 3 Sussex District Authorities.

B.16 *Gatwick Diamond Local Authority Members' Meeting, 16 April 2013*

...those at the meeting endorsed an approach in which:

- the evidence base with respect to the needs of the travelling community is shared and examined on a collaborative basis
- each district or borough looks to address within its own boundaries any need for permanent sites identified in its assessments
- the local authorities work together to gain a greater understanding of the need for transit accommodation, liaising with the Counties and the Gatwick Diamond and, as appropriate, with other local authorities.

Outstanding Issue & Ongoing Cooperation

Action: Ongoing joint working will need to continue to understand the evolving nature of the travelling families within the borough and the interactions across the wider area.

Issue C: Economic Growth

Extent of the Issue

- C.1 Crawley, primarily due to the strength of Manor Royal and Gatwick Airport, represents the largest and most significant commercial centre within the sub-region, accommodating 48% of all employment floorspace in northern West Sussex. Its locational strengths, including proximity to an international airport at Gatwick, the M23/motorway network and fast rail links to London and the South Coast combined with employment land offer mean that Crawley doesn't directly compete with other smaller centres in West Sussex but instead with larger centres in the South East such as Croydon, Basingstoke and Guildford.
- C.2 Evidence indicates that Crawley's economy is recovering well from recession and is forecast to grow significantly during the Local Plan period. Significant baseline demand for economic development is identified at Crawley, forecasting need for a minimum of 16,500 additional total jobs. In spatial terms this creates a need for a minimum of **77 hectares additional employment land take for B Class uses**²¹, of which only 42 hectares can be delivered through existing land supply²². Even allowing for the intensification and retention of land and buildings for employment uses within the Main Employment areas, particularly Manor Royal, this leaves **a shortfall in employment land provision of 35 hectares**.
- C.3 It is considered that this shortfall should be accommodated through strategic employment development delivered in the medium to long term, and ideally this should be located in the north of the borough as this area is in close proximity to Gatwick Airport, would complement Manor Royal and cannot accommodate housing development because of aircraft noise thereby representing the most sustainable use of land. However, policies which safeguard land for a possible new runway at Gatwick currently prevent land to the north of Manor Royal and south/east of Gatwick being considered for development until such time that there is certainty on safeguarding.

Nature of Cooperation

- C.4 The Gatwick Diamond Local Strategic Statement acknowledges that given the strength of Crawley/Gatwick as a business location and the concentration of demand, this area is expected to be the main focus for future economic development, at least in the short and medium terms.
- C.5 There is an evidenced inter-dependency between the three northern West Sussex authority areas for employment, with Crawley attracting daily commuting flows from both Horsham and Mid Sussex, amounting to nearly 15,000 people, and a reverse flow from Crawley to Mid Sussex amounting to just over 2,000 people.
- C.6 The three northern West Sussex authorities jointly commissioned an Employment Land Review (ELR) (2009/10) and a subsequent NPPF-compliant update Economic Growth Assessment (EGA) (2014). The EGA brought the economic factors and projections together across the wider area. The joint EGA clarifies and evidences the inter-dependency of the North West Sussex area recognising how the areas are inter-related and the issues of land supply and demand within a Gatwick Diamond context.

²¹ Northern West Sussex Economic Growth Assessment (NLP, 2014)

²² Crawley Employment Land Trajectory (CBC, 2014)

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

- C.7 Both Horsham and Mid Sussex have current shortfalls of supply to meet their own baseline requirements but are promoting new sites through their emerging plans to provide employment space. If Crawley's employment land needs are not able to be met within the borough because safeguarding constraints are not removed, then, in order to ensure the economic strength of the Gatwick Diamond is maintained, employment land would need to be identified in adjoining local authority areas. The delivery programme set out within the Gatwick Diamond Local Strategic Statement acknowledges the need for the Gatwick Diamond Authorities to work together to secure an agreed approach towards a strategic business location(s) in the longer term.
- C.8 The potential constraints of Crawley in meeting strategic economic needs at the heart of the Diamond have long been recognised. The 2009 Core Strategy Review Topic Paper 1, Scenario 2, identified that work with neighbouring authorities would be necessary to examine the potential for strategic employment to establish a sub regional spatial economic vision, with potential allocations at (but not necessarily within) Crawley.
- C.9 The council also has contributed to the West Sussex Delivery and Investment Framework (2013), a study being progressed by West Sussex County Council to identify potential development and infrastructure investment opportunities across West Sussex and facilitate their delivery.
- C.10 Crawley sits within the Coast to Capital Local Enterprise Partnership area, which is "focused on delivering growth for one of Britain's most economically important areas which includes the airport economy surrounding London Gatwick Airport" (Coast to Capital Profile, October 2013). The council's links with the LEP have primarily been through its close working with the Gatwick Diamond. The LEP produced its Strategic Economic Plan (SEP) in March 2014. This document confirms the importance of improvements to the 'Heart of the Gatwick Diamond' which includes Crawley, Manor Royal and the North of Horsham allocation.
- C.11 The letter sent to neighbouring authorities referred to above in A.18 (CBC, 20 August 2014) and set out in Appendix F expressed Crawley's unmet economic growth needs of 35ha for B Use Classes over the Plan period, explained the sequential approach established through the emerging Crawley Local Plan (in the first instance this is land within Crawley; if this is not possible then land 'at Crawley'; and then, finally, to land near Crawley/Gatwick) and asked whether this could be met outside of the borough's boundaries. In particular, Reigate and Banstead Borough Council (6 October 2014) confirmed it was in the process of commissioning work to scope out the possibility of additional employment development in the borough to meet 'strategic needs' (defined as growth that falls outside of local demand and needs). However, they do not yet have the conclusions of this work, nor have policy provisions for such development (see Appendix G).

Retail

- C.12 Discussions have also taken place between Reigate and Banstead Borough Council and Crawley Borough Council and between Horsham District Council and Crawley Borough Council in relation to the scale, extent and phasing of retail development and the extent to which there can be maintained a complementary relationship between the town centres. The Gatwick Diamond LSS identifies a hierarchy of town centres, particularly identifying the potential for growth in Crawley and Redhill town centres. CBC submitted a representation to the Reigate and Banstead Core Strategy (subsequently resolved) seeking clarity about their new retail proposals, and ensuring the

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

impact on neighbouring town centres would be considered. Reigate and Banstead Borough Council has made a similar representation to the Crawley Local Plan.

C.13 Authorities Involved

Gatwick Diamond Authorities

Northern West Sussex Authorities

Coastal West Sussex Authorities

Outcomes from Cooperation & Resolution of Issue

Crawley Local Plan

C.14 Reflecting Crawley's key role in the sub-region, the Local Plan policies have been prepared to protect and consolidate its existing main employment areas for economic development purposes in order to meet the short-term needs of business, and commit to further assessment of land for new economic development following a decision on the potential runway expansion at Gatwick Airport. Should it be necessary to identify land at the periphery of Crawley or beyond its borough boundary, the Local Plan identified that the council is committed to working closely alongside the Gatwick Diamond authorities to identify a sustainable location for economic development that complements the role and function of the town in the sub-region.

Retail

C.15 Crawley has been working closely with development partners to try and deliver a step-change retail-led development, but changes in the national retail market, including a huge increase in online retailing, has meant this has not proved deliverable at this time. However, significant town centre mixed use redevelopment opportunities are allocated in the Local Plan and additional wording is proposed to clarify the anticipated scale of retail growth.

Supporting Agreements

C.16 Gatwick Diamond Local Strategic Statement:

Given the strength of Crawley/Gatwick as a business location and the concentration of demand there, this area is expected to be the main focus for future economic development, at least in the short and medium term. Redhill/Reigate and, to the edge of the Diamond, Leatherhead, with their locations close to the M25, attract a slightly different business market and are also expected to continue to be important locations for business development. This does not mean that business development in other locations is precluded. In general, that development is likely to reflect the particular attributes of the smaller settlements and support local communities rather than providing strategic employment growth (Gatwick Diamond Local Strategic Statement, para. 4.5).

** The Gatwick Diamond Local Authorities will plan for economic growth with employment levels rising to reflect a strengthening and repositioning of the Diamond economy and the character and structure of individual local economies.*

** In the short and medium term the primary focus for new business development will be the areas around Crawley and Gatwick reflecting their existing strength as a business location and the potential for attracting growth to this location.*

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

(Gatwick Diamond Local Strategic Statement, Local Strategic Direction for the Short to Medium Term).

- C.17 Northern West Sussex Authorities Position Statement (September 2013):
The aim agreed by the three authorities is to secure policies which support realistic and sustainable levels of economic growth, tailored to the particular needs of the individual local authority areas (NWS Position Statement, revised July 2014, para. 5.1).

Building on existing initiatives and policies, the three Local Plans, with a positive approach to sustainable economic growth will assist delivery of the ambitions of the LSS and the LEP Economic Plan (NWS Position Statement, revised July 2014)

- C.18 Coast to Capital Local Enterprise Partnership Strategic Economic Plan:
At the heart of the Gatwick Diamond – are the towns of Horsham and Crawley, both with important business locations, with the UK's largest industrial estate, Manor Royal in Crawley.
We are going to focus on protecting and enhancing those business areas... Adequate transport infrastructure very often lies at the heart of what we are trying to achieve... (Coast to Capital Strategic Economic Plan, 2014, page 52).

- C.19 Manor Royal Business Group Ltd Position Statement:
The Manor Royal Business Group released a statement in October 2013 which states that the Business District is an important economic hub that should be valued, protected and enhanced so that it is well placed to continue to effectively compete and contribute to the economic success of the Gatwick Diamond into the future. The statement also states that: "MRBD Ltd. maintains the firm belief that a strong and successful Manor Royal is key to the economic and social wellbeing of Crawley, West Sussex and the Gatwick Diamond.

Retail

- C.20 Although Crawley is the largest settlement, the Diamond lacks a single town centre that can compete effectively with places such as Croydon, Brighton, Kingston, Bluewater and Guildford, particularly in terms of retailing. Crawley is best positioned to fulfil that role and enable local people to access the quality of shopping and services available in other parts of the South East... The scale of any retail growth should not, however, be such as to prevent other town centres continuing to play an effective role for their local communities. These other town centres have their own character and provide a more local shopping environment which should continue to attract people even though larger, more regional facilities may be at Crawley. In particular, in recognition of its hub status, Redhill is also acknowledged as a strategic centre of significance which will undergo change of a sub-regional scale in support of the role Crawley will perform (Gatwick Diamond Local Strategic Statement, para. 4.5).

** The role of Crawley Town Centre will be enhanced, enabling it to fulfil a more effective role in competing with major retail centres elsewhere in the South East. Whilst retail-led, the changes should also provide an environment which makes Crawley Town Centre a more attractive place to visit.*

(Gatwick Diamond Local Strategic Statement, Local Strategic Direction for the Short to Medium Term).

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

C.21 RBBC and CBC Statement of Common Ground on Meeting the Duty to Cooperate and Retail Issues relating to Reigate and Banstead Borough Council Draft Core Strategy (April 2012):
Minor amendments to the RBBC Core Strategy agreed between the authorities have clarified that Reigate and Banstead is not currently pursuing 'step-change' retail development in the short term and will ensure testing the impact of retail development on other town centres.

Outstanding Issue & Ongoing Cooperation

Action: As recognised in the Local Plan, following the government's decision on UK Airport expansion, a focused assessment of land for delivering Strategic Employment Site(s) will be carried out in accordance with the following hierarchy:

- Land within Crawley, in the north of the borough;
- Land at Crawley/Gatwick, in the areas immediately adjoining the borough;
- Land near Crawley/Gatwick.

The ongoing joint working will need to continue with the Gatwick Diamond authorities to assess the most appropriate and sustainable options for strategic employment locations to support the economy of the Gatwick Diamond, in the vicinity of Crawley/Gatwick.

Issue D: Gatwick Airport

Extent of the Issue

- D.1 Gatwick Airport is a key driver for the local economy, with its influence extending across the Gatwick Diamond. As the second largest airport in the UK and the busiest single runway airport in the world, it is not only a major provider of jobs but also a factor in the location of many businesses. It is currently used by around 34 million passengers per annum (mppa), which is expected to rise to 40 mppa by 2020 and potentially up to 45 mppa by 2030.
- D.2 A key issue in relation to future planning policies regarding Gatwick Airport is the nature of national policy in relation to aviation and runway capacity. The government is currently in the process of investigating national aviation policy through the independent Airports Commission chaired by Sir Howard Davies. Until there is a new national policy on airport development issued by the government, the National Aviation Policy published in March 2013 makes it clear that land outside existing airports which may be required for airport development in the future needs to be protected against development which would be incompatible with the potential development of future runways.
- D.3 For Crawley this means continuing the safeguarding policy which is based on the land identified in Gatwick Airport's masterplan (July 2012) as being needed for a wide-spaced second runway. An interim report published by the Airports Commission in December 2013 confirmed that Gatwick Airport Limited's proposal for a second runway was shortlisted for further assessment. The Airports Commission published its assessment of the shortlisted proposals for consultation between November 2014 and February 2015. The final report by the Airports Commission to the government is anticipated in the summer of 2015.
- D.4 There is a legal agreement, drawn up in 1979, between West Sussex County Council and Gatwick Airport Limited, preventing the building of a second runway at Gatwick before 2019.

Nature of Cooperation

- D.5 Whilst Gatwick Airport is located within Crawley Borough Council's administrative boundaries, a range of impacts affect a much wider area. Reflecting this, there are a number of established groupings relating to the functioning and development of Gatwick Airport, across a range of administrative and professional and technical areas.
- D.6 Well-established joint working arrangements have successfully delivered a Section 106 Agreement for controlling environmental impacts created by the airport, supported by joint monitoring arrangements. It has been agreed that Reigate and Banstead lead on air quality issues reflecting the prevailing wind direction, Crawley Borough Council on noise. The latest S106 Agreement was signed in 2008 and expires in 2015. The scope of the review has already been discussed between West Sussex County Council, Crawley Borough Council and Gatwick Airport, and preparation are underway for its revision.
- D.7 There is also a Memorandum of Understanding between Crawley Borough Council and West Sussex County Council and all the surrounding districts and counties (Horsham District Council, East Sussex County Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Surrey County Council, and Tandridge District Council). This MOU sets out how the two authorities will represent the interests of and consult with

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

all the other local authorities in discussions relating to the airport. This includes the requirement for meetings of the Gatwick Officers Group and Gatwick Joint Local Authorities (Members) to take place regularly. The original MOU was signed in 2001, and the latest in 2008.

D.8 These existing working arrangements have formed the basis of ongoing work and discussions in relation to Airports Commission work. Whilst individual responses were made by the local authorities to the Airports Commission on the Stage 1 submission by Gatwick Airport for a second runway, joint evidence was prepared to aid understanding of the impacts for the surrounding authorities. Ongoing work is taking place within sub-groups of the Gatwick Officers Group which are meeting Gatwick Airport Limited to discuss matters in relation to:

- Employment and Housing;
- Surface Access;
- Noise;
- Air Quality;
- Relocation of businesses.

D.9 The Airports Commissioners and Secretariat visited the Gatwick area on 9 July 2014. This was arranged by West Sussex County Council and Crawley Borough Council, who conducted a tour of the area. Council Leaders and Chief Executives from authorities surrounding Gatwick were invited to a meeting with the Commission in the morning, and there was a question and answer session in the afternoon with a wider representation from community groups, local councillors and business leaders from a wide area surrounding the airport. The Commission was interested in receiving joint evidence of issues from these audiences and this work is continuing. A further joint forum with the Airports Commission and Leaders of the local authorities in the Gatwick area, including Crawley, is to take place on 16 December 2014.

D.10 Other issues relating to the airport are also monitored and controlled jointly, for example Annual Parking Surveys carried out jointly with Enforcement officers from all the surrounding districts.

D.11 Authorities Involved

Gatwick Diamond Authorities

Gatwick Officers Group

East Sussex County Council
Surrey County Council
West Sussex County Council
Crawley Borough Council
Horsham District Council
Mid Sussex District Council
Mole Valley District Council
Reigate and Banstead Borough Council
Tandridge District Council

Gatwick Joint Local Authorities Group

Members from above Councils

Gatwick Airport Consultative Committee:

Local Authorities

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Businesses
Tourism
Community
Environmental
Gatwick Airport
Department for Transport

Noise and Track Monitoring Advisory Group

Gatwick Transport Forum

Outcomes from Cooperation & Resolution of Issue

Crawley Local Plan

- D.12 Crawley's Local Plan is prepared in the context of growth of Gatwick Airport to 45 million passengers per annum within its existing configuration of a single runway; two terminal airport, subject to new environmental controls being agreed through an updated s106 agreement.
- D.13 This involves the policies within the Plan to ensure development within the airport contributes to the safe and efficient operation of the airport and satisfactory safeguards are in place to mitigate the impact of the operation of the airport on the environment including noise, air quality, flooding, surface access, visual impact and climate change.
- D.14 It is acknowledged in section 1 (paragraphs 1.38 – 1.43) of the Local Plan that the outcome of government decisions on the future of aviation runway expansion will affect the scope and proposals within the Local Plan in some form, regardless of the decision made, and this will, therefore, trigger some review and assessment of the Crawley Local Plan at that stage. Crawley Borough Council is closely involved in discussions with the Airports Commission.

Supporting Agreements

- D.15 Gatwick Diamond Local Strategic Statement
- * *Growth of Gatwick to its maximum capacity as a single runway, two terminal airport will be supported subject to ongoing agreements and commitments to manage the environmental impacts.*
 - * *The Gatwick Diamond Local Authorities and their partners in the Gatwick Diamond Initiative will work together and with Gatwick Airport to secure a high quality environment for travellers at the airport and a range of routes which meet the needs of business users as well as those of the wider tourist market. (Gatwick Diamond Local Strategic Statement, Local Strategic Direction for the Short to Medium Term).*
 - * *The Gatwick Diamond Local Authorities will share information and views on long term strategic issues relating to government air transport policy. (Gatwick Diamond Local Strategic Statement, Longer Term Local Strategic Direction).*
- D.16 S106 Agreement and Memorandum of Understanding 2008.
The Section 106 Agreement requires reviewing before the end of 2015 which CBC and WSCC as signatories will work with all the other local authorities as well.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Outstanding Issue & Ongoing Cooperation

Action: Joint working and evidence gathering on issues related to a potential second runway will continue, particularly to support authorities' responses to the Airports Commission consultation November 2014 – February 2015.

Action: The outcome of the Airports Commission recommendation and government decision will focus the future working of the local authorities within the area of influence of Gatwick Airport.

Issue E: Key Transport Routes

Extent of the Issue

- E.1 Crawley has excellent transport connections, lying adjacent to the M23, close to the M25 and on the main railway line linking London to the south coast.
- E.2 The town itself is served by an extensive bus service network including a guided bus service, Fastway, as well as four railway stations and a network of green corridors which provide attractive pedestrian and cycle routes through the neighbourhoods and into the town centre and out into the countryside.
- E.3 The National Cycle Routes NCR20 (London to Brighton) and NCR21 (from Greenwich to Eastbourne, and forming part of the “Avenue Verte” Greenway, linking London to Paris) also run through the borough.
- E.4 The principle of the need for a ‘western relief road’ for Crawley has long been established and remains an aspiration of the West Sussex County Council. Transport modelling carried out by both Horsham District and Crawley Borough Councils indicate that the development strategy would be able to be delivered, subject to mitigation measures to manage peak traffic impacts.

Nature of Cooperation

- E.5 Strategic transport issues were identified for the Gatwick Diamond, through joint working, highlighting three areas on which transport policy should be focused:
- Improvement of public transport
 - Investment into sustainable transport at the regional hubs: Crawley/Gatwick and Reigate/Redhill
 - Improvement of strategic links to provide connectivity beyond the Gatwick Diamond.
- E.6 Whilst the detailed individual technical evidence work needed to support each local authority Local Plan has been prepared primarily on a borough-wide basis, this has been set within the strategic context of Gatwick Diamond and county wide information and priorities, and has involved the sharing of information. This includes ensuring the work is coordinated across the county level by the county council and across the county boundaries into Surrey, between the two adjoining county authorities.
- E.7 The transport modelling work which has been completed to support the Crawley Local Plan includes consideration of impacts on the strategic road network outside the borough. Substantial technical input and support has been provided by West Sussex County Council as the Local Highway Authority throughout the commissioning of these studies – including preparation of the brief, joint meetings with the consultants, working directly with the consultants to create an accurate and up-to-date model which connects into the wider county models, feedback on draft documents and final sign-off.
- E.8 Discussions have taken place between Crawley Borough Council, Horsham District Council and West Sussex County Council regarding potential differences of outcomes in the two authorities’ strategic transport modelling studies. These discussions have clarified and explained the anomalies. It has been agreed that further assessment should be carried out to clarify cross-boundary impacts and take into account planned development at North Horsham.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

E.9 Authorities Involved

West Sussex County Council

Gatwick Diamond Authorities

Transportation Infrastructure Providers: Highways Agency
 National Rail
 Metrobus

Outcomes from Cooperation & Resolution of Issue

Crawley Local Plan

E.10 Crawley's Local Plan is supported by an Infrastructure Plan which sets out the agreements and position statements with key infrastructure providers. This ensures the Local Plan has been prepared on a realistic and deliverable basis, and obstacles to the implementation of growth and development are understood and addressed. The transport impacts of the development sites in the Local Plan have been assessed, both within and beyond the borough.

E.11 Involvement of County Council as the Highway Authority in the evidence studies across all of the Districts ensures continuity across areas and all data is derived from and fed back into the County model.

Supporting Agreements

E.12 Gatwick Diamond Local Strategic Statement

Increasing congestion on the transport network is an acknowledged issue, and improvement on the transport infrastructure is vital to the success of the Gatwick Diamond. Progress has been made, for example, through the 'Fastway' bus system and the Thameslink improvements, when delivered, will increase rail capacity and connectivity. However, without a resolution of the transport issues which face the area, the Diamond will not be able to realise its full potential (NWS Position Statement, Sept 2013, para. 6.1).

** At a strategic level, transport policies will be focused with the aim of securing:*

- *investment in sustainable transport to, between and within the two regional hubs.*
- *enhanced rail connectivity and reliability to London.*
- *public transport connectivity to Gatwick and the main urban areas.*
- *enhancement to the operation of the road network providing strategic access to Gatwick.*
- *no deterioration of congestion beyond current levels, both in terms of delay and journey time reliability.*

(Gatwick Diamond Local Strategic Statement, Local Strategic Direction for the Short to Medium Term).

E.13 Critical improvements are currently being planned by the Highways Agency to the M23 and A23. The Highways Agency is planning to introduce managed motorways on the M23 which would enable mechanisms such as hard shoulder running to be used.

E.14 Improvements are being planned for Three Bridges Station and Gatwick Airport Station.

Outstanding Issue & Ongoing Cooperation

E.15 Investment into a further station as part of the new Kilnwood Vale neighbourhood.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

E.16 Extension of the 'Fastway' bus system beyond Crawley.

Action: Implications of any future extensions to Crawley or increasing traffic into Crawley from major strategic new development planned in neighbouring authorities must be fully understood to enable appropriate mitigation to be in place.

Action: Commissioning of joint further modelling where in-house assessments could be supported.

Issue F: Flooding and Flood Risk

Extent of the Issue

- F.1 The borough of Crawley falls entirely within the upper reaches of the River Mole catchment which flows northwards to the Thames, and the town's proximity to the catchment has meant that several areas are identified by the Environment Agency as at risk of flooding. It is currently estimated that 846 properties in the borough are at a 'significant' risk of flooding (i.e. have a greater than 0.1% chance of flooding in any particular year). This risk also extends beyond the borough boundary to affect a number of properties in the neighbouring borough of Reigate and Banstead.
- F.2 Flash flooding from surface water run-off and/or sewer overload has also been an issue across the borough, following heavy localised rainfall events. This issue is not limited to areas identified by the Environment Agency flood risk maps. It is a critical issue for Crawley as the clay soil and density of urban development increases the volume of surface water run-off and of run-off via the sewage system. Further development could increase the risk of this type of flooding if not designed properly, potentially increasing flood risk within and beyond the borough.

Nature of Cooperation

- F.3 Measures into management and understanding of fluvial flood risk on a strategic level are supported by expertise driven by the Environment Agency, whilst the management of surface water flooding has been devolved by the County Council down to the district and borough level within West Sussex. For Crawley, development (particularly where it increases runoff into the river system) could impact on river flooding downstream within the River Mole catchment. This flows northwards towards the Thames and has implications for Gatwick Airport and neighbouring authorities, particularly Reigate and Banstead. Measures including agreed Local Plan policy wording in relation development and flood risk have evolved from joint working with the Environment Agency in particular having fed into this process.
- F.4 The Upper River Mole Strategy Working Group was established in 2007, following the government requirement for ensuring all areas are covered by Strategic Flood Risk Assessments (SFRA). A key objective of the group was to guide the joint commission and preparation of SFRA for each authority on a collective basis in order to establish full coverage across the river basin catchment. Crawley's Strategic Flood Risk Assessment has been updated in partnership with the Environment Agency within the context of the wider river basin area to ensure it provides the most accurate position from which to plan.
- F.5 The rationale for undertaking the work through a joint working group was to address the whole river catchment collectively rather than by individual local authorities. In some of the larger districts, only a small area may be affected, for example only a small part of the Horsham area is covered by the River Mole catchment boundary, with none of their main settlements affected. Therefore, Horsham District Council's involvement in the Working Group was primarily to enable sustainable delivery of potential extensions to Crawley covered by the Area of Search in the West Sussex Structure Plan, and now being taken forward as the new Kilnwood Vale neighbourhood to the west of Bewbush.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

- F.6 Alongside the Local Authorities covered by the River Mole catchment, a key partner was the Environment Agency and this included representatives from both of their south east regional offices: Southern and Thames.
- F.7 In addition to the Upper River Mole Strategy Working Group, the Upper Mole Flood Alleviation Scheme has also been brought forward on a cross-authority basis. This is an Environment Agency-led initiative involving five separate components within a single scheme designed to reduce flooding caused within Crawley. This programme of works is continuing to be rolled forward as funding for each component's implementation is confirmed.
- F.8 Works on the Upper Mole Scheme have been progressed to the stage where two elements, Worth Farm and Tilgate Lake, are functioning as designed. The completion of these two schemes will allow communities downstream to benefit from the reduction in flood risk offered. Construction of the scheme at Clays Lake is planned to commence in September 2014, with a completion date of September 2016. The Environment Agency is continuing to investigate the feasibility of the provision of a flood attenuation scheme within the Ifield area, and is working with local stakeholders and undertaking further works to understand the full benefits a scheme in this area could offer. In addition, the Environment Agency is continuing to explore opportunities to secure external funding for flood alleviation works for the Ifield area.
- F.9 The council has also worked alongside Gatwick Airport and the Environment Agency to support the production of the *Flood Risk Management and Reduction at Gatwick Airport* report. GAL and the Environment Agency published the approach to be taken to manage and reduce the flood risks at Gatwick Airport in the report in 2011. The report set out a strategic approach to reducing flood risk, as well as practical approaches to be considered and adopted for new and existing developments at the airport. This recognises that although the airport is at risk of flooding, development within its boundary is necessary to facilitate its continued operation. Therefore, the document sets out an agreed approach between Gatwick Airport and the Environment Agency to manage the balance between development and flood storage capacity, by ensuring that new development is designed and brought forward in a manner that does not increase flood risk.
- F.10 The West Sussex Strategic Flood Risk Management Board is made up of senior officers from WSCC, all West Sussex borough and districts councils, EA and Southern Water. The group's role is to take a strategic overview of the entirety of flood risk and drainage management across West Sussex. The West Sussex Flood Risk Management Group comprises WSCC, the EA (Southern & Thames), Southern Water Services and all the borough and district councils within West Sussex. Its role is to plan and act to reduce the risk and consequence of flooding now and in the future in West Sussex.
- F.11 The West Sussex Local Flood Risk Management Strategy sets out the current levels of risk and how the risk management authorities (including Crawley Borough Council) will work together over the next five years to achieve the following objectives:
- Understand the areas that flood
 - Manage the flood risk in West Sussex
 - Enable people, communities, business and public bodies to work together more effectively
 - Put communities at the heart of the work and help West Sussex residents during flood events, and recover as quickly as possible after incidents.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Among the duties mentioned in the strategy that are common to all risk management authorities are the duty to cooperate on flood risk and the duty to contribute towards the achievement of sustainable development. The strategy is currently progressing through approval by all the district and borough councils and will then get adopted by West Sussex County Council in March/April 2014.

F.12 Authorities Involved

Upper River Mole Strategy Working Group:	Crawley Borough Council Horsham District Council Mid Sussex District Council Mole Valley District Council Reigate and Banstead Borough Council Surrey County Council Tandridge District Council West Sussex County Council Environment Agency (Southern and Thames Regions) Gatwick Airport
Upper Mole Flood Alleviation Scheme:	Environment Agency Crawley Borough Council Horsham District Council Mid Sussex District Council Gatwick Airport
Flood Risk Management and Reduction at Gatwick Airport	Gatwick Airport Limited Environment Agency Crawley Borough Council
Lead Local Flood Authorities	West Sussex County Council Surrey County Council

Outcomes from Cooperation & Resolution of Issue

Local Plan

F.13 The majority of Crawley's key housing sites lie outside flood risk areas. Of the sites allocated by the Local Plan for residential development, three sites are situated in areas partially affected by Flood Zone 2 and/or Flood Zone 3a; these being: Breezehurst Drive, Bewbush; Bewbush West Playing Fields (Henty Close), Bewbush and Land adjacent Desmond Anderson, Tilgate. The principle of development at each of these sites has been agreed by the Environment Agency, subject to applicants demonstrating, through a Flood Risk Assessment, that proposals are acceptable in terms of flood risk.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

- F.14 The policy within the Plan also ensures development must not increase the risk of flooding elsewhere particularly downstream in the River Mole catchment, by mitigation measures and techniques for the reduction of surface water run-off. This reflects feedback from consultation and close joint working alongside the Environment Agency.

Supporting Agreements

- F.15 Upper River Mole Strategy Working Group: Terms of Reference
Work in close collaboration with other disciplines, in recognition of the impact that flooding has on environmental, economic and social issues.
(Upper River Mole Strategy Working Group Terms of Reference, Principle 2.)

Ensure that development sites, land use planning and other strategic plans prepared by partner organisations do not adversely impact adjoining local authorities.
(Upper River Mole Strategy Working Group Terms of Reference, Principle 4.)

Support/promote sustainable flood alleviation schemes that are proposed by developers or lead local flood authorities, as well as initiatives which reduce flood risk from all sources of flooding as carried out by member authorities.
(Upper River Mole Strategy Working Group Terms of Reference, Principle 5.)

To achieve co-ordinated strategic flood risk management of the Upper Mole catchment.
(Upper River Mole Strategy Working Group Terms of Reference, Aim.)

Within the Upper Mole catchments: Local Authorities, relevant flood protection agencies, infrastructure providers, large landowners/developers (in particular the Gatwick Airport operator) and any others which the group deems would contribute to the groups aims.
(Upper River Mole Strategy Working Group Terms of Reference, Membership.)
- F.16 Gatwick Water Cycle Study
The Gatwick Water Cycle Study (see Section J) recognises surface water flooding as a material planning consideration, and recommends that sustainable drainage techniques should be implemented to control flood risk.

Outstanding Issue & Ongoing Cooperation

- F.17 Whilst the cross-boundary, catchment-level work has established a foundation for ensuring plans and developments within each local authority area are considered in their wider context and the implications for downstream impacts can be taken into account and managed and mitigated against, this information must continue to be updated and dialogue continued between the authorities and organisations involved. This includes updating all of the information across the whole basin following the completion of the alleviation schemes to understand the improvements and benefits they may offer to other development opportunities within the river catchment.
- F.18 The implications on the river basin flood management approach of potential expansion at Gatwick Airport are being scrutinised in detail to ensure the necessary mitigations are put in place, if the government decides a second runway should be provided at Gatwick following the Airports Commission's recommendation. This would need to be understood in light of the additional new developments coming forward within the separate local authority areas, as a new runway and associated development would constitute a substantial hard surfacing of currently greenfield land.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

F.19 The Upper River Mole Strategy Working Group and the contacts made through the commissioning of direct evidence base and physical improvement works will continue to function as an appropriate forum to address any new and emerging issues.

Action: Cross-boundary and cross-body working is necessary to ensure the remaining flood alleviation schemes not currently progressing (the Ifield Flood Detention Reservoir) are able to commence or a suitable alternative meets the originally identified needs of the area.

Action: Any progression of further proposed extensions to either, or both, the east and west side of Crawley will require continuing ongoing partnership working between the relevant authorities and the Environment Agency to ensure this can be accommodated without causing substantial problems of flooding downstream.

Action: The implication of potential future expansion at Gatwick Airport on the river basin continue to be assessed, particularly to support authorities' responses to the Airports Commission in the autumn 2014.

Issue G: Climate Change and Low Carbon Economy

Extent of the Issue

- G.1 Crawley Borough Council is committed to supporting the town in achieving carbon neutrality and zero waste by 2050. The challenges of global warming are similarly recognised across the wider functional economic area of the Gatwick Diamond.
- G.2 At a national level, the Climate Change Act enshrines the government's commitment to tackle climate change and this is reflected in the work done locally. The need to develop lifestyles and businesses which are sustainable in the long term represent a theme which should run through strategies and policies at all levels.

Nature of Cooperation

- G.3 Sharing technical evidence and emerging policy approaches have ensured a consistent approach is being taken across the various authority areas, including those in West Sussex and Reigate and Banstead, whilst allowing these to be adapted and appropriate for the differing circumstances relevant to each administrative area.
- G.4 Commitments between the Gatwick Diamond Authorities establish a strong foundation for joint working to develop and support innovative projects which help reduce the Diamond's carbon footprint.
- G.5 In developing a longer term local strategic direction, the LSS indicates that the authorities will: *"look at a range of joint initiatives including a more coordinated approach towards the standards set for new development, the preparation of a Diamond based element for the Community Infrastructure Levy to support projects which cross local authority boundaries, the pooling of knowledge and resources to secure more sustainable forms of power generation attuned to the particular potential of the Diamond and the possibility of a joint energy services company (ESCo)"*.
- G.6 The Gatwick Diamond LSS acknowledges that the local authorities and the Gatwick Diamond Initiative are already engaging in a range of cross-boundary projects designed to help reduce carbon emissions, including the sustainable transport initiatives of 'Easit' and research into woodfuel energy supplies.
- G.7 Crawley Borough Council and Horsham District Council have a strong working relationship in relation to climate change and energy planning policy. Regular meetings have taken place with officers from Strategic Planning and the Environment sections of the two authorities over the last two years. These meetings have been used to share expertise in relation to the development and delivery of decentralised energy networks within the respective administrative boundaries and explore any cross boundary working, where appropriate. The meetings have also been used to discuss evolving government policy in relation to climate change and energy issues, as well as respective evidence bases and relevant planning applications and decisions.

G.8 Authorities Involved

Gatwick Diamond Authorities

West Sussex:

Crawley Borough Council

Horsham District Council

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

West Sussex County Council

Reigate and Banstead

Outcomes from Cooperation & Resolution of Issue

Local Plan

- G.9 Crawley's Local Plan builds on the unique characteristics of the borough and opportunities that it offers for low carbon and sustainable design solutions. The policies ensure new developments at least meet the current government standards for energy use. In addition the Plan introduces the development of district energy networks within the town, and indicates the key locations where evidence has highlighted should be priority areas for such networks.
- G.10 The discussions and cooperation between Crawley Borough Council and Horsham District Council have helped to shape the development of the Local Plan climate change policies and have resulted in amendments to policies as they have evolved.

Supporting Agreements

G.11 Gatwick Diamond Local Authorities Members Group – 21 May 2012

G.12 Gatwick Diamond Local Strategic Statement

The aspiration of the Diamond to minimise its carbon footprint can be addressed through all of its strategic aims and should be a central theme to future growth and development.

(Gatwick Diamond Local Strategic Statement, paragraph 8.1).

** The Gatwick Diamond Local Authorities will develop and maintain strategies for securing more sustainable forms of development and a more efficient low carbon economy.*

** The Gatwick Diamond Local Authorities will work together and with partners in the Gatwick Diamond Initiative to develop and support innovative projects which help reduce the Diamond's carbon footprint.*

(Gatwick Diamond Local Strategic Statement, Local Strategic Direction for the Short to Medium Term).

** The Gatwick Diamond Local Authorities will work together to establish a coordinated approach to the development of a lower carbon economy in areas and on issues where there is clear added value from working across local authority boundaries*

(Gatwick Diamond Local Strategic Statement, Longer Term Local Strategic Direction)

G.13 Horsham and Crawley Climate Change and Decentralised Energy Statement
Agreed principles and policy approach and commitment to working together on cross boundary issues.

Given the close geographical proximity of the two authorities the council's recognise that there are similarities and opportunities arising from planning policies on these issues.

Both authorities are committed to continue this joint working and information exchange on these issues as part of the duty to cooperate and beyond land use planning considerations, as well as sharing expertise, good practice and lessons learnt when dealing with specific developments and enquiries.

Further work streams such as Supplementary Planning Documents and working together on cross boundary issues and any relevant applications will also ensure that this approach is continued throughout the Plan period to 2030.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Outstanding Issue & Ongoing Cooperation

G.14 There is a recognition that to meet the challenging targets set within the Climate Change Act, it will, amongst other things, be necessary for much wider involvement of the business community, for whom there are significant potential advantages in long term resource efficiency and energy resilience. This provides strong justification for continual ongoing cooperation and sharing of information and approaches across the Gatwick Diamond economic functional area; providing consistency and economies of scale from initiatives and policy-based requirements.

G.15 The Gatwick Diamond LSS confirms that the existing cross-boundary approach to initiatives which benefit from joint working will be sustained.

Action: The potential for supporting larger scale low carbon energy providers will continue to be assessed and explored through joint working across appropriate administrative areas as opportunities arise.

Issue H: Broadband Infrastructure

Extent of the Issue

- H.1 An objective for the planning system is to facilitate the growth of new and existing telecommunication systems. Advanced, high quality communications infrastructure is essential for economic growth.
- H.2 The development of high speed broadband technology and other communications networks also play a vital role in the provision of local community facilities and services.

Nature of Cooperation

- H.3 Broadband coverage has been identified as an issue to consider and address strategically across the area, having been raised across both the Gatwick Diamond and the West Sussex Authority areas, as it affects the economic growth of rural areas and main employment areas alike.

H.4 Authorities Involved

Gatwick Diamond Grow Group

West Sussex Authorities

Outcomes from Cooperation & Resolution of Issue

Local Plan

- H.5 The outcomes from this joint working have resulted in the inclusion of a consistent policy approach within the emerging Local Plans across the Gatwick Diamond and West Sussex county areas.
- H.6 Crawley Borough Council Local Plan now includes a policy explicitly relating to the strategic delivery of telecommunications infrastructure, ensuring that fibre optic or other cabling would not need to be retrofitted to any new residential, employment and commercial developments.

Supporting Agreements

H.7 Gatwick Diamond Local Strategic Statement

High quality access to superfast broadband is increasingly seen as a major factor for business and, as work patterns change and more work is done from home, it is important that this access is widely available across the Diamond (Gatwick Diamond Local Strategic Statement, para. 6.4).

** Partners in the Gatwick Diamond Initiative will continue to work with providers to extend and improve superfast broadband across the Diamond.*
(Gatwick Diamond Local Strategic Statement, Local Strategic Direction for the Short to Medium Term).

H.8 West Sussex Better Connected

A West Sussex County Council project – West Sussex Better Connected is aiming to ensure that recent funding from central government will mean that 90% of West Sussex will have access to superfast broadband by April 2015. This is directing funding to the areas where the financing of improvements is not being met by the market.

Outstanding Issue & Ongoing Cooperation

Action: Ongoing work will continue to monitor the implementation of the complementary policies as they become adopted into Local Plans, and

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

the coverage of broadband and up-to-date telecommunications infrastructure in a continually evolving technological world, to ensure the Gatwick Diamond functional economic area remains nationally and internationally competitive. This information gathering will be carried out at local authority level and across the Gatwick Diamond and county areas.

Issue I: Green Infrastructure

Extent of the Issue

- I.1 Whilst the local policies within the Local Plan can ensure the implementation on a site-by-site basis of improvements, enhancements and extensions to the green infrastructure network, it is acknowledged that nature and landscapes do not respect administrative boundaries. The High Weald Area of Outstanding Natural Beauty, Priority Habitat Areas, Ancient Woodland and Landscape Character Areas are examples of such areas. In recent years it has become apparent that to reverse the national decline in biodiversity and to withstand future pressures such as climate change there needs to be an integrated landscape scale approach. This moves away from site based conservation to understanding how the landscape functions to support people and wildlife. The correct scale of this conservation is often broad; a leading example being the High Weald Area of Outstanding Natural Beauty (AONB). This is a nationally important landscape where great weight should be given to conserving the landscape and scenic beauty of the designation – a small area of the High Weald AONB lies within the southern boundary of the borough.
- I.2 The green landscaping in and around the built environment is a key part of Crawley’s New Town character, as is the setting of the town, with a clear distinction between the urban area and countryside providing a sense of place for residents and visitors and ensuring accessible countryside remains within easy reach by foot. Connections to public rights of way which can be used for multiple types of recreation extend beyond the borough boundary.

Nature of Cooperation

- I.3 By identifying the strategic linkages and critical habitats and areas of importance for the purposes of nature, flood alleviation and recreation, across the wider area each individual administrative area understands the role it plays within this wider picture; and can highlight the important elements necessary for protection and enhancement. This will ensure green infrastructure at a landscape wide level can be properly planned for.
- I.4 Figure 3 shows the coverage of the Gatwick Greenspace Partnership area, highlighting primarily the green landscape areas which provide the setting for the towns and smaller settlements.

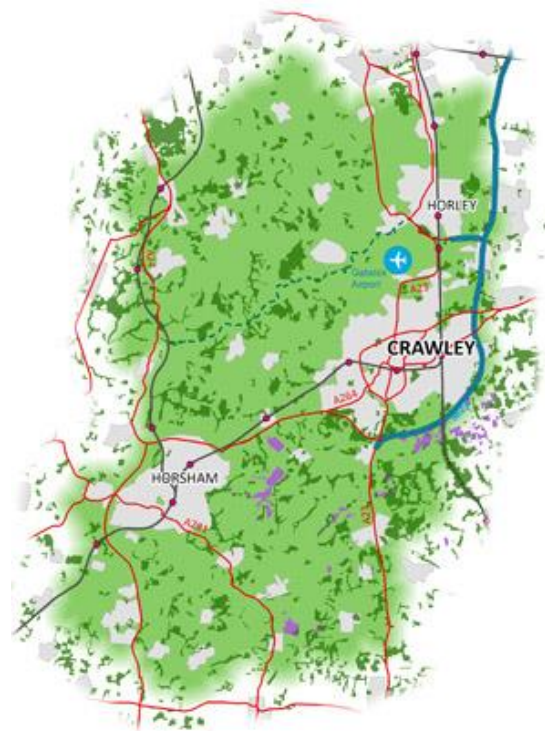


Figure 3: Gatwick Greenspace Partnership Living Landscapes Map

http://www.sussexwildlifetrust.org.uk/gatwick_greenspace/page00001.htm

- I.5 Much of this work has been led by the well-established Gatwick Greenspace Partnership. Since 1994, the partnership has been working across some 200 square kilometres of countryside and in the adjacent towns of Reigate, Dorking

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

and Horley, in Surrey and Crawley and Horsham in Sussex, with Gatwick Airport in the middle.

- I.6 The Gatwick Diamond LSS acknowledges that the joint work already being carried out has started to show the value of mapping green infrastructure at a strategic level, and confirms that the role of the Diamond Initiative is primarily one of support to the already strongly developed local level joint working on countryside issues. However, it commits the local authorities to work together to prepare a Diamond-based green infrastructure plan.
- I.7 The Sussex Biodiversity Record Centre Partnership manage and disseminate biodiversity data. There has been also been partnership working to create an Ancient Woodland Inventory for Sussex as well as the Biodiversity Action Plans and Opportunity Areas that cross administrative boundaries. Projects within these areas have been identified and will be implemented through Community Infrastructure Contributions.
- I.8 West Sussex County Council have historically retained and maintained records for biodiversity and nature conservation across the county. This includes the designation of local nature conservation areas and Biodiversity Action Plans for both habitats and species. This information is shared with the borough council to include in planning policy and development control decisions. This role provided at a county-wide level ensures consistency in the assessment of sites and habitats.
- I.9 Whilst only a small part of Crawley is covered by the AONB, the High Weald AONB covers a much larger area and is managed through a Partnership Agreement. This provides continuity and stability to the arrangements of the AONB Partnership whose aim is to deliver duties and obligations arising from the Countryside and Rights of Way (CROW) Act 2000 which includes the operation and management of an AONB partnership. The partnership includes Natural England and the 15 Local Authorities that cover the High Weald AONB. Responsibilities of each member include: contributing to the costs of the partnership based on the amount of AONB within the administrative boundary; working with East Sussex County Council and Natural England in relation to the management of the AONB; and working with local government members to promote the role and value of AONBs to society. This is done through the Officer Steering Group and the Joint Advisory Committee made up of councillors and officers from the member authorities. A Management Plan has been prepared and approved by the member authorities to conserve and enhance the natural beauty of the AONB to 2019.

I.10 Authorities Involved

Gatwick Diamond Local Authorities

Gatwick Greenspace Partnership:

Surrey County Council
West Sussex County Council
Crawley Borough Council
Horsham District Council
Mole Valley District Council
Reigate and Banstead Borough Council
Horley Town Council
Sussex Wildlife Trust
Gatwick Airport Limited

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

	Arcadia, the charitable foundation of Lisbet Rousing and Pater Baldwin
High Weald AONB:	Ashford Borough Council Crawley Borough Council East Sussex County Council Hastings Borough Council Horsham District Council Kent County Council Mid Sussex District Council Rother District Council Sevenoaks District Council Surrey County Council Tandridge District Council Tonbridge and Malling Borough Council Tunbridge Wells Borough Council Wealden District Council West Sussex District Council
Green Infrastructure Network:	Adur District Council Arun District Council Chichester District Council Crawley Borough Council East Sussex County Council Horsham District Council Mid Sussex District Council Natural England South Downs National Park Authority Sussex Wildlife Trust West Sussex County Council Worthing Borough Council
Biodiversity Record Centre Partnership:	Borough and District Councils in Sussex East Sussex County Council Environment Agency High Weald AONB Unit Natural England South Downs National Park Authority Southern Water Sussex Wildlife Trust

Outcomes from Cooperation & Resolution of Issue

Local Plan

I.11 Crawley was planned and designed as a New Town set within the countryside and having many green spaces and landscaping integrated within the neighbourhoods from the outset. This establishes Crawley's opportunities to maintain its position as an 'urban forest' through implementation of the

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

'character' and open space policies within the Local Plan and support the government aim to create an overall net gain in biodiversity.

- I.12 Through a range of policies, the Local Plan seeks to achieve the provision, retention and/or enhancement of the specific functions of the green infrastructure within the borough's administrative boundaries and extensions of links into the wider countryside beyond the borough, including:
- Publicly accessible open space including formal sports facilities and informal amenity space;
 - The High Weald Area of Outstanding Natural Beauty;
 - Beyond the built up area where landscape character areas have been defined;
 - Value of existing soft landscaping – character and appearance, structure, screening or softening;
 - Requirements of new development – amenity spaces including private gardens, landscape schemes, street trees, green roofs and walls and links to and between areas of public open space and accessible countryside;
 - Areas of biodiversity value such as Sites of Nature Conservation Importance, Local Nature Reserves, adjacent SSSIs, Biodiversity Opportunity Areas and Ancient Woodland;
 - Heritage assets;
 - Opportunities to meet open space, sport and recreation needs;
 - Green spaces for flood storage, conveyance and SUDs.
- I.12 To ensure Crawley's urban environment does not extend uncontrolled into the countryside primarily located within the neighbouring authorities' administrative areas and to plan against unrestricted coalescence of the towns, the Local Plan introduces policy approach based on the Landscape Character Assessment, which complements and builds on those prepared by West Sussex County Council and English Nature, and those of the adjoining local district authorities.
- I.13 Recognition of the significance of the High Weald AONB landscape precludes consideration of any major extension of Crawley to the south, focusing consideration to the east and west.

Supporting Agreements

- I.14 **Gatwick Greenspace Partnership**
This is an agreement to fund a living landscape project covering Horley, Crawley and Horsham to inform, educate and involve urban communities with the natural surroundings. This include improving and managing links between habitats and encouraging the public to use them.
- I.15 **High Weald AONB Partnership Agreement**
An agreement to fund and work within a partnership which conserves and enhances the natural beauty of the AONB.
- I.16 **Sussex Biodiversity Partnership Agreement**
An agreement to fund the Biodiversity Record Centre which provides biodiversity data to support decision making.
- I.17 **Gatwick Diamond Local Strategic Statement**
** The Gatwick Diamond Local Authorities will look to safeguard and enhance the intrinsic character of the countryside, maintaining the opportunities it provides for employment, recreation and renewable energy.*

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

** Greenfield development and loss of countryside will be kept to a minimum. (Gatwick Diamond Local Strategic Statement, Local Strategic Direction for the Short to Medium Term).*

** As part of joint working at a district level, the Gatwick Diamond Local Authorities will develop work already done into a green infrastructure plan for the Gatwick Diamond. (Gatwick Diamond Local Strategic Statement, Longer Term Local Strategic Direction).*

Outstanding Issue & Ongoing Cooperation

- I.18 Any progression with further proposed extensions to either, or both, the east and west side of Crawley would require continuing ongoing partnership working between the relevant authorities, either through the Gatwick Greenspace Partnership or on a one-to-one basis to ensure that this can be accommodated without causing unrestricted coalescence between towns. Impacts on the important functions of green infrastructure would need to be minimised, managed and mitigated and the green infrastructure network extended and enhanced through high quality design, landscaping proposals and considered layouts.
- I.19 This should be set in a continually updated framework of information through monitoring of biodiversity and losses and gains across the wider area, particularly monitoring the movement of species caused by climate change and other influences.

Action: Crawley Borough Council will support the progression of Biodiversity Opportunity Areas within the borough and identify ways for delivering these through Green Infrastructure SPD.

Issue J: Water & Wastewater Infrastructure

Extent of the Issue

- J.1 As a Local Authority in south east England, Crawley suffers from water-stress, and its water usage has implications on the water availability across the wider area.
- J.2 It is also the location for one of the waste water treatment works in the area, and as such the infrastructure network is critical to supporting deliverable developments.

Nature of Cooperation

- J.3 The Gatwick Water Cycle Scoping Study (2010) was produced jointly, in-house by the four local authorities (Crawley, Horsham, Mid Sussex and Reigate and Banstead), with a follow-up Outline Study (2011) jointly commissioned by the local authority partners, with partnership support from the Environment Agency and the water companies operating across the area. A Crawley-focused update was commissioned recently (2013).
- J.4 The Gatwick Sub-Regional Scoping Study (2010) identified that the level of development required in the area will have a significant impact upon the water environment unless appropriate infrastructure or mitigation can be put in place and therefore the Outline WCS Study was undertaken.
- J.5 The follow-up Outline Water Cycle Study (2011) was undertaken on behalf of the above authorities, in partnership with the Environment Agency and infrastructure providers responsible for water provision and wastewater treatment. Collectively, the organisations involved in progressing the study were referred to as the Water Cycle Steering Group. This study met a requirement set by the now-revoked South East Plan, which required the Gatwick Diamond authorities to undertake an assessment across the area, due to its water stress location. The project was Crawley Borough Council-led, taking the initiative and contacting all of the Gatwick Diamond Authorities at the time. Tandridge and Mole Valley District Councils declined, as the majority of their development was concentrated in the London-focused areas of their districts. The Outline Study involved a review of the existing requirements for water in the study area, highlighting issues and opportunities associated with housing and commercial growth, as well as an assessment of the requirements for water infrastructure to facilitate development and identification of potential environmental constraints. In addition, the study reviewed and incorporated findings of the flooding constraints in the study area, and also identified issues that required more detailed analysis.
- J.6 Crawley recently re-commissioned the original consultants of the Water Cycle Study to review the findings of the Gatwick Water Cycle Study, on the basis of renewed development levels included the emerging Local Plan, changes to national guidance and updated technical information. Prior to commissioning, all previous local authority partners were asked if they wanted to be involved in an update, and all declined. An ongoing dialogue was also maintained with the relevant water infrastructure providers in the build-up to commissioning the updated work. The study was carried out by the original consultants and was based on the same principles as the initial final report.
- J.7 Of particular interest for understanding the future development potential of Crawley, is an understanding of the quantity of additional new development currently capable of being catered for by the Crawley Wastewater Treatment

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Works. The capacity considered has included the development currently planned for within Crawley's administrative boundaries and Kilnwood Vale, immediately adjoining its edges. The review study indicates that any further development delivery beyond that already planned will require phasing in line with upgrades to the system.

J.8 Strategic development beyond the eastern boundary would also be expected to link into the Wastewater Treatment Works at Crawley. However, this has been assessed as requiring a costly solution to cross the motorway. Smaller scale developments in this location could potentially seek to connect into the existing sewage system serving Copthorne.

J.9 Authorities Involved

Local Authorities:	Crawley Borough Council Horsham District Council Mid Sussex District Council Reigate and Banstead Borough Council
Water Companies:	East Sutton and Surrey Water South East Water Southern Water Thames Water
Environment Agency	Southern and Thames Regions

Outcomes from Cooperation & Resolution of Issue

Local Plan

J.10 The outcomes of this joint working have led to a consistent policy approach across the area in relation to water management.

J.11 Crawley's Local Plan is supported by an Infrastructure Plan which sets out the agreements and position statements with key infrastructure providers. This ensures the Local Plan has been prepared on a realistic and deliverable basis, and obstacles to the implementation of growth and development are understood and addressed.

Supporting Agreements

J.12 **Gatwick Water Cycle Study**
Establishes an understanding of the quantity of development currently capable of being catered for by the Crawley Wastewater Treatment Works.

Outstanding Issue & Ongoing Cooperation

Action: Any further development delivery beyond that already planned will require phasing in line with upgrades to the Crawley Wastewater Treatment Works.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

APPENDIX A: TIMELINE FOR KEY DUTY TO COOPERATE MILESTONES

Key

Key Stages:

Bold, Black Text: National Changes

Bold, Orange Text: Formal Local Plan Stages

Outcomes:

Bold, Blue Text: Duty to Cooperate Agreements & Documents

Blue Text: Joint Evidence Base Documents

Orange Text: Local Plan informal consultation/engagement

Purple Text: CBC responses to other Local Authorities highlighting Crawley's constraints and anticipated unmet needs

Meetings:

Italic, Green Text: Duty to Cooperate Strategic Planning Councillor meetings

Italic, Black Text: Duty to Cooperate Strategic Planning Officer meetings

Milestone	Date
Publication of West Sussex Landscape Character Assessment, West Sussex County Council	2003
Signing of Gatwick Airport Memorandum of Understanding	2008
Core Strategy Review Consultation Workshop	May 2009
Publication of Strategic Housing Market Assessment (SHMA), GVA	May 2009
Publication of Employment Land Review (ELR) Part 1, GL Hearn	September 2009
Publication of At Crawley Study, GL Hearn	October 2009
Publication of West Sussex Energy Study, CSE	October 2009
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>12 November 2009</i>
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>6 January 2010</i>
<i>Water Cycle Study Steering Group</i>	<i>5 February 2010</i>
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>24 February 2010</i>
<i>Water Cycle Study Steering Group</i>	<i>15 March 2010</i>
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>25 March 2010</i>
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>9 April 2010</i>
<i>Water Cycle Study Steering Group</i>	<i>26 April 2010</i>
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>12 May 2010</i>
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>20 May 2010</i>
<i>Water Cycle Study Steering Group</i>	<i>3 June 2010</i>
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>21 July 2010</i>
Publication of New Market Town Study, GL Hearn	August 2010
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>24 August 2010</i>
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>23 September 2010</i>
Publication of Employment Land Review (ELR) Part 2, GL Hearn	October 2010
Publication of Bio City Pre-Feasibility Study, Bio City Development Company	November 2010
Adoption of West of Crawley Joint Area Action Plan	July 2009
Publication of Gatwick Water Cycle Study, Entec UK Limited	January 2011
<i>Flood Risk Management and Reduction at Gatwick Airport</i>	<i>14 February 2011</i>
<i>West Sussex Planning Policy Officers CIL Group</i>	<i>7 April 2011</i>
<i>West Sussex Planning Policy Officers CIL Group</i>	<i>15 July 2011</i>
<i>Gatwick Diamond GROW Strategy Project Group</i>	<i>6 September 2011</i>
<i>West Sussex Planning Policy Officers Group</i>	<i>2 September 2011</i>
<i>Gatwick Diamond GROW Strategy Project Group</i>	<i>26 September 2011</i>
<i>Crawley/Horsham: Strategic Urban Extensions</i>	<i>4 October 2011</i>
<i>West Sussex Planning Policy Officers CIL Group</i>	<i>1 November 2011</i>
<i>Crawley Borough Council response to Reigate and Banstead Outstanding Issues Core Strategy consultation</i>	<i>11 November 2011</i>

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Milestone	Date
<i>Gatwick Diamond GROW Strategy Project Group</i>	14 November 2011
Localism Act	15 November 2011
<i>Crawley/Horsham: Strategic Urban Extensions</i>	16 November 2011
<i>Crawley/Mid Sussex: Strategic Urban Extensions</i>	22 November 2011
<i>Crawley/Environment Agency</i>	24 November 2011
Approval of Gatwick Diamond Local Strategic Statement and Signing of Memorandum of Understanding	March 2012
<i>Crawley/Mid Sussex: MSDC District Planning</i>	1 December 2011
<i>West Sussex Planning Policy Officers Group</i>	2 December 2011
<i>Crawley/Reigate & Banstead: RBBC Core Strategy</i>	20 December 2011
<i>Crawley Borough Council response to Mid Sussex District Plan Preferred Strategy consultation</i>	4 January 2012
Local Plan Crawley 2029 Issues & Options Consultation Starts	19 January 2012
<i>Northern West Sussex Authorities Planning Officers: SHMA</i>	19 January 2012
<i>Gatwick Diamond GROW Strategy Project Group</i>	23 January 2012
<i>Crawley/West Sussex County Council: Transport Modelling</i>	24 January 2012
<i>Gatwick Airport Consultative Committee</i>	26 January 2012
<i>Northern West Sussex Authorities Planning Officers: SHMA</i>	1 February 2012
<i>Crawley/Gatwick Airport: Crawley Local Plan</i>	2 February 2012
<i>Crawley/Environment Agency</i>	23 February 2012
<i>Gatwick Officers Group</i>	23 February 2012
<i>Gatwick Diamond GROW Strategy Project Group</i>	27 February 2012
Local Plan Crawley 2029 Issues & Options Consultation Ends	1 March 2012
<i>Gatwick Diamond Portfolio Holders, Chief Executive and Senior Planners</i>	7 March 2012
<i>West Sussex Planning Policy Officers Group</i>	9 March 2012
<i>AONB Joint Advisory Committee</i>	23 March 2012
<i>Green Infrastructure Network</i>	26 March 2012
National Planning Policy Framework	27 March 2012
<i>Northern West Sussex Authorities Planning Officers: Position Statement</i>	29 March 2012
<i>West Sussex Planning Policy Officers CIL Group</i>	29 March 2012
<i>Crawley Borough Council response to Horsham District Framework Housing Numbers consultation</i>	5 April 2012
<i>West Sussex Chief Planning Officer Group</i>	12 April 2012
<i>Crawley Borough Council response to Reigate and Banstead Core Strategy Proposed Submission consultation</i>	16 April 2012
<i>Gatwick Diamond GROW Strategy Project Group</i>	17 April 2012
<i>Crawley/Reigate & Banstead: RBBC Core Strategy</i>	17 April 2012
<i>West Sussex Joint Planning Board</i>	20 April 2012
<i>Crawley/Environment Agency</i>	26 April 2012
<i>Gatwick Airport Consultative Committee</i>	26 April 2012
<i>Gatwick Officers Group</i>	1 May 2012
<i>Crawley/Thames Water</i>	4 May 2012
<i>Gatwick Airport Transport Forum Steering Group</i>	9 May 2012
<i>AONB Officer Steering Group</i>	10 May 2012
<i>Crawley/West Sussex County Council: Transport Modelling</i>	21 May 2012
<i>Gatwick Diamond Local Authorities Portfolio Holders</i>	21 May 2012
<i>Gatwick Joint Local Authorities</i>	30 May 2012
<i>Gatwick Diamond GROW Strategy Project Group</i>	11 June 2012
<i>Coastal & Northern West Sussex Authorities</i>	18 June 2012
<i>Gatwick Diamond Initiative GROW Group</i>	26 June 2012
<i>West Sussex Chief Planning Officer Group</i>	6 July 2012
<i>Northern West Sussex Authorities Planning Officers: Position Statement</i>	13 July 2012
<i>West Sussex Joint Planning Board</i>	13 July 2012

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Milestone	Date
Gatwick Diamond GROW Strategy Project Group	18 July 2012
Northern West Sussex Authorities Planning Officers: Position Statement	18 July 2012
Gatwick Airport Consultative Committee	19 July 2012
Crawley/West Sussex County Council: Transport Modelling	25 July 2012
Northern West Sussex Authorities Planning Officers: SHMA	31 July 2012
Crawley/Reigate & Banstead: RBBC Core Strategy	10 August 2012
Reigate and Banstead Borough Council and Crawley Borough Council Statement of Common Ground on meeting the Duty to Cooperate and Retail issues relating to Reigate and Banstead Borough Council Draft Core Strategy	24 August 2012
Crawley/Reigate & Banstead: attendance at RBBC Core Strategy Exploratory Meeting	29 August 2012
Gatwick Airport Transport Forum Steering Group	5 September 2012
Gatwick Officers Group	6 September 2012
West Sussex Planning Policy Officers Group	7 September 2012
Crawley/Horsham: Strategic Urban Extensions	17 September 2012
Gatwick Diamond GROW Strategy Project Group	19 September 2012
Crawley/Reigate & Banstead: RBBC Core Strategy	19 September 2012
Email out Cabinet Report and Preferred Strategy Document prior to formal consultation start to all Gatwick Diamond and West Sussex Authorities	28 September 2012
Publication of Strategic Housing Market Assessment (SHMA) Update, GVA	October 2012
Crawley Transport Modelling Stage 1, Amey Consulting	October 2012
Crawley/Mid Sussex: MSDC District Planning	16 October 2012
AONB Officer Steering Group	17 October 2012
Gatwick Airport Consultative Committee	18 October 2012
Local Plan Crawley 2029 Preferred Strategy Consultation Starts	22 October 2012
Gatwick Joint Local Authorities	24 October 2012
West Sussex Joint Planning Board	25 October 2012
Duty to Cooperate Crawley Borough Council Response to Brighton and Hove City Council Request for assistance in delivering unmet Housing Requirement	2 November 2012
Crawley/Mid Sussex: MSDC District Planning	6 November 2012
Gatwick Officers Group	6 November 2012
West Sussex Joint Planning Board	13 November 2012
AONB Joint Advisory Committee	14 November 2012
Crawley/Gatwick Airport: Crawley Local Plan	16 November 2012
Gatwick Diamond GROW Strategy Project Group	19 November 2012
Northern West Sussex Authorities Planning Officers: EGA	27 November 2012
Gatwick Diamond Initiative GROW Group	28 November 2012
Gatwick Airport Noise and Track Monitoring Advisory Group	29 November 2012
Local Plan Crawley 2029 Preferred Strategy Consultation Ends	3 December 2012
Northern West Sussex Authorities Planning Officers	4 December 2012
Coastal & Northern West Sussex Authorities	6 December 2012
West Sussex Planning Policy Officers Group	7 December 2012
Northern West Sussex Authorities Chief Executives Strategic Planning	10 December 2012
Crawley/West Sussex County Council: Transport Modelling	13 December 2012
Crawley/Reigate & Banstead: RBBC Core Strategy	8 January 2013
Gatwick Airport Transport Forum Steering Group	9 January 2013
West Sussex Planning Policy Officers CIL Group	9 January 2013
Crawley/Mid Sussex: MSDC District Planning Gypsy and Traveller Assessment telephone interview	17 January 2013
Gatwick Officers Group	23 January 2013

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Milestone	Date
Gatwick Diamond GROW Strategy Project Group	23 January 2013
Green Infrastructure Network	23 January 2013
Crawley/Gatwick Airport: Crawley Local Plan	25 January 2013
Crawley/Horsham: Strategic Urban Extensions	30 January 2013
Gatwick Airport Consultative Committee	31 January 2013
Economic Assessment of Growth at Gatwick Airport, Berkeley Hanover Consulting Limited (BHC)	February 2013
Gatwick Airport Noise and Track Monitoring Advisory Group	14 February 2013
AONB Officer Steering Group	25 February 2013
Mid Sussex Gypsy, Traveller and Travelling Showpeople Workshop	27 February 2013
West Sussex Planning Policy Officers Group	8 March 2013
Northern West Sussex Authorities Chief Executives Strategic Planning	13 March 2013
Crawley/Horsham: Viability Workshop	19 March 2013
Reigate and Banstead Borough Council and Crawley Borough Council Statement of Common Ground on meeting Strategic Housing Needs	21 March 2013
Revocation of South East Plan	25 March 2013
AONB Joint Advisory Committee	25 March 2013
Northern West Sussex Authorities Planning Officers: EGA	26 March 2013
Gatwick Joint Local Authorities	27 March 2013
Gatwick Airport Transport Forum Steering Group	24 April 2013
Northern West Sussex Authorities Planning Officers: Position Statement	24 April 2013
Gatwick Diamond GROW Strategy Project Group	10 April 2013
Gatwick Diamond Local Authorities Portfolio Holders	16 April 2013
Gatwick Airport Consultative Committee	16 April 2013
Gatwick Diamond GROW Strategy Project Group	23 April 2013
Northern West Sussex Authorities Planning Officers: Position Statement	24 April 2013
Crawley/Southern Water	2 May 2013
Northern West Sussex Authorities Planning Officers: EGA	10 May 2013
Northern West Sussex Authorities Planning Officers: EGA	13 May 2013
Gatwick Airport Noise and Track Monitoring Advisory Group	16 May 2013
Crawley/Mid Sussex: Strategic Urban Extensions	22 May 2013
Local Plan Crawley 2029 Additional Sites Consultation Starts	3 June 2013
West Sussex Planning Policy Officers Group	7 June 2013
West Sussex Local Flood Risk Management Strategy	10 June 2013
Crawley/Mid Sussex: MSDC District Planning	11 June 2013
Gatwick Officers Group	11 June 2013
Northern West Sussex Authorities Planning Officers: EGA	12 June 2013
Northern West Sussex Authorities Planning Officers: Position Statement	14 June 2013
Crawley Borough Council response to Mid Sussex District Plan Proposed Submission consultation	17 June 2013
Gatwick Diamond GROW Strategy Project Group	18 June 2013
Green Infrastructure Network	27 June 2013
Local Plan Crawley 2029 Additional Sites Consultation Ends	1 July 2013
Northern West Sussex Authorities Planning Officers: Position Statement	3 July 2013
Northern West Sussex Authorities Planning Officers: EGA	4 July 2013
West Sussex Chief Planning Officer Group	5 July 2013
Northern West Sussex Authorities Chief Executives Strategic Planning	8 July 2013
West Sussex Joint Planning Board	July 2013
Gatwick Airport Transport Forum Steering Group	17 July 2013

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Milestone	Date
<i>Horsham Duty to Cooperate Workshop</i>	23 July 2013
<i>Gatwick Airport Consultative Committee</i>	23 July 2013
<i>Gatwick Diamond Local Authority Portfolio Holders</i>	24 July 2013
<i>Crawley/Horsham: Horsham Preferred Option Local Plan</i>	1 August 2013
<i>Coastal & Northern West Sussex Authorities</i>	9 August 2013
<i>Gatwick Joint Local Authorities</i>	11 September 2013
<i>Gatwick Airport Noise and Track Monitoring Advisory Group</i>	12 September 2013
<i>Gatwick Airport Transport Forum Steering Group</i>	18 September 2013
<i>Northern West Sussex Authorities Planning Officers: Position Statement</i>	13 August 2013
<i>Gatwick Diamond GROW Strategy Project Group</i>	21 August 2013
<i>Northern West Sussex Authorities Planning Officers: EGA</i>	22 August 2013
<i>Gatwick Officers Group</i>	4 September 2013
<i>West Sussex Planning Policy Officers Group</i>	6 September 2013
<i>Crawley/Gatwick Airport: Crawley Local Plan</i>	6 September 2013
Northern West Sussex Position Statement signed by LA Leaders	9 September 2013
<i>Northern West Sussex Authorities Planning Officers: Mid Sussex District Plan</i>	11 September 2013
<i>Gatwick Airport Sub-Groups: Housing and Employment</i>	13 September 2013
<i>Crawley/Mid Sussex: attendance at Mid Sussex District Plan Exploratory Meeting</i>	16 September 2013
<i>Gatwick Diamond Local Authority Portfolio Holders</i>	17 September 2013
<i>Gatwick Airport Sub-Groups: Transport Working Group</i>	18 September 2013
<i>Viability Assessment: Community Infrastructure Levy, Affordable Housing and Local Plan viability, Nationwide CIL Service</i>	October 2013
<i>Biodiversity Record Centre</i>	1 October 2013
<i>AONB Officer Steering Group</i>	8 October 2013
<i>Gatwick Airport Sub-Groups: Transport Working Group</i>	16 October 2013
<i>Crawley Borough Council response to Horsham District Framework Preferred Strategy consultation</i>	17 October 2013
<i>Gatwick Airport Consultative Committee</i>	17 October 2013
Provision of Housing – a Statement of Common Ground	21 October 2013
<i>Guildford Duty to Cooperate Workshop</i>	7 November 2013
<i>AONB Joint Advisory Committee</i>	8 November 2013
<i>Gatwick Officers Group</i>	12 November 2013
<i>Crawley/West Sussex County Council: Transport Modelling</i>	14 November 2013
<i>West Sussex Joint Planning Board</i>	22 November 2013
Agreement to Expand Joint Planning Board to include BHCC, LDC, and ESCC	22 November 2013
Signing by Portfolio Holders Joint Planning Board of Duty to Cooperate Agreement for Joint Working	22 November 2013
<i>Gatwick Airport Noise and Track Monitoring Advisory Group</i>	28 November 2013
<i>Northern West Sussex Authorities Planning Officers</i>	29 November 2013
<i>Gatwick Airport Sub-Groups: Housing and Employment</i>	3 December 2013
<i>West Sussex Planning Policy Officers CIL Group</i>	5 December 2013
<i>Gatwick Airport Sub-Groups: Transport Working Group</i>	11 December 2013
<i>West Sussex Planning Policy Officers Group</i>	12 December 2013
<i>Gatwick Airport Sub-Groups: Air Quality</i>	13 December 2013
<i>Gatwick Airport Sub-Groups: Land Use</i>	13 December 2013
<i>Email out draft CBC DtC statement to all Prescribed Bodies for comment and fact-checking</i>	23 December 2013
<i>Gatwick Diamond GROW Strategy Project Group</i>	7 January 2014
<i>Gatwick Airport Transport Forum Steering Group</i>	8 January 2014
<i>Horsham Duty to Cooperate Workshop</i>	9 January 2014
<i>West Sussex Chief Planning Officer Group</i>	9 January 2014
<i>Biodiversity Record Centre</i>	21 January 2014

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Milestone	Date
<i>Crawley/Adur/Horsham/Worthing: Housing Numbers</i>	22 January 2014
<i>Gatwick Diamond Local Authorities Portfolio Holders</i>	22 January 2014
<i>Gatwick Diamond Local Authorities Leaders</i>	January 2014
<i>West Sussex Local Authorities Leaders</i>	January 2014
<i>Gatwick Airport Sub-Groups: Housing and Employment</i>	27 January 2014
<i>Gatwick Airport Sub-Groups: Transport Working Group</i>	29 January 2014
<i>Gatwick Airport Consultative Committee</i>	30 January 2014
<i>Northern West Sussex Authorities Planning Officers: EGA</i>	10 February 2014
<i>Crawley Borough Council response to Coast to Capital LEP Strategic Economic Plan</i>	11 February 2014
<i>Crawley Borough Council response to Mid Sussex Duty to Cooperate Gypsy and Traveller Request</i>	17 February 2014
<i>Gatwick Airport Noise and Track Monitoring Advisory Group</i>	27 February 2014
<i>Crawley/Reigate and Banstead</i>	28 February 2014
<i>Horsham Duty to Cooperate Workshop</i>	4 March 2014
<i>Gatwick Diamond GROW Strategy Project Group</i>	5 March 2014
Planning Practice Guidance Launched	6 March 2014
<i>West Sussex Planning Policy Officers Group</i>	7 March 2014
<i>Copthorne Neighbourhood Plan Stakeholder Workshop</i>	10 March 2014
<i>Northern West Sussex Senior Planning Officers</i>	11 March 2014
<i>Gatwick Airport Sub-Groups: Transport Working Group</i>	19 March 2014
<i>Gatwick Diamond Local Authority Portfolio Holders</i>	25 March 2014
<i>Gatwick Officers Group</i>	26 March 2014
<i>Gatwick Joint Local Authorities</i>	26 March 2014
<i>Gatwick Airport Sub-Groups: Noise</i>	27 March 2014
<i>Northern West Sussex: Strategic Sites & Broad Location SHLAA</i>	1 April 2014
<i>Northern West Sussex: Housing Needs</i>	4 April 2014
Coast to Capital Local Enterprise Partnership Strategic Economic Plan (March 2014) Published	4 April 2014
<i>Crawley/Crawley CCG</i>	8 April 2014
<i>Horsham Issue draft Duty to Cooperate Workshops Report: Horsham District Council & 'Coast to Capital' LEP Local Authorities, March 2014, Incorporating Strategic Issues into Local Plans – Summary Report of Duty to Cooperate Workshops (PAS)</i>	9 April 2014
<i>Gatwick Airport Transport Forum Steering Group</i>	9 April 2014
<i>Gatwick Airport Consultative Committee</i>	10 April 2014
<i>Northern West Sussex: EGA</i>	22 April 2014
<i>Publication of Economic Growth Assessment (EGA), NLP</i>	23 April 2014
<i>Northern West Sussex: Strategic Sites & Broad Location SHLAA</i>	7 May 2014
<i>Crawley/Horsham/WSCC: Transport Modelling</i>	7 May 2014
<i>Gatwick Diamond GROW Strategy Project Group</i>	12 May 2014
<i>West Sussex Chief Planning Officers Group</i>	13 May 2014
<i>Gatwick Airport Noise and Track Monitoring Advisory Group</i>	13 May 2014
<i>Crawley Borough Council officer comments to HDC draft Duty to Cooperate Report</i>	15 May 2014
<i>Northern West Sussex: Strategic Sites & Broad Location SHLAA</i>	21 May 2014
<i>Northern West Sussex: SHMA Inception Meeting</i>	27 May 2014
<i>Gatwick Officers Group</i>	4 June 2014
<i>West Sussex Planning Policy Officers Group</i>	6 June 2014
<i>Gatwick Diamond GROW Strategy Project Group</i>	18 June 2014
<i>Gatwick Airport Sub-Groups: Air Quality</i>	18 June 2014
Local Flood Risk Management Strategy 2013 - 2018	18 June 2014
<i>Crawley Borough Council response to the submission Horsham District Planning Framework</i>	26 June 2014
<i>Crawley Borough Council response to the Horsham District Council Duty to Cooperate formal request</i>	26 June 2014

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Milestone	Date
Final HDC Duty to Cooperate Report Issued: Horsham District Council & 'Coast to Capital' LEP Local Authorities, March 2014, Incorporating Strategic Issues into Local Plans – Summary Report of Duty to Cooperate Workshops (PAS)	26 June 2014
<i>Northern West Sussex: Strategic Sites & Broad Location SHLAA</i>	<i>1 July 2014</i>
<i>Gatwick Area Airports Commission Visit</i>	<i>9 July 2014</i>
<i>Gatwick Airport Sub-Groups: Housing and Employment</i>	<i>9 July 2014</i>
<i>Crawley/Horsham/WSCC/West of Ifield Consortium Consultants</i>	<i>15 July 2014</i>
<i>Northern West Sussex Senior Planning Officers: Position Statement Update</i>	<i>16 July 2014</i>
<i>Gatwick Airport Sub-Groups: Transport Working Group</i>	<i>17 July 2014</i>
<i>Gatwick Airport Transport Forum Steering Group</i>	<i>17 July 2014</i>
<i>Northern West Sussex: SHMA</i>	<i>18 July 2014</i>
<i>Gatwick Airport Consultative Committee</i>	<i>24 July 2014</i>
<i>Gatwick Diamond GROW Strategy Project Group</i>	<i>28 July 2014</i>
<i>Crawley Borough Council response to the Tandridge District Council Joint SHMA request</i>	<i>28 July 2014</i>
Horsham and Crawley Joint Climate Change Statement of Agreement, Crawley Borough Council and Horsham District Council	5 August 2014
Northern West Sussex Strategic Sites & Broad Locations SHLAA Appendix	5 August 2014
Northern West Sussex Position Statement Revised July 2014: signed by LA Planning Portfolio Holders	7 August 2014
<i>Northern West Sussex: Strategic Sites</i>	<i>14 August 2014</i>
<i>Email out draft CBC DtC Statement to all Prescribed Bodies for comment and fact-checking</i>	<i>19 August 2014</i>
<i>Formal Letter to all Neighbouring Authorities to clarify Crawley Borough level of unmet needs</i>	<i>19 August 2014</i>
<i>Crawley/Brighton and Hove: Strategic Planning & Unmet Needs</i>	<i>22 August 2014</i>
Crawley Borough submission draft Local Plan 2015 – 2030 Publication Consultation Starts	1 September 2014
<i>Gatwick Diamond Representation at Further Alterations of London Plan Examination Hearings Session 2: Housing</i>	<i>2 September 2014</i>
<i>Northern West Sussex: SHMA</i>	<i>5 September 2014</i>
<i>Crawley/Mole Valley: Crawley Local Plan & Planning Policy in Mole Valley</i>	<i>9 September 2014</i>
<i>West Sussex Planning Policy Officers Group</i>	<i>12 September 2014</i>
<i>Crawley/West Sussex County Council: Transport Modelling & Infrastructure</i>	<i>18 September 2014</i>
<i>West Sussex County Chief Executives</i>	<i>22 September 2014</i>
<i>Gatwick Diamond GROW Strategy Project Group</i>	<i>22 September 2014</i>
<i>CBC signed Lewes District Council's Duty to Cooperate Statement of Common Ground</i>	<i>30 September 2014</i>
<i>Crawley/Mid Sussex: Objectively Assessed Housing Needs</i>	<i>1 October 2014</i>
<i>Crawley/Horsham: Horsham District Planning Framework</i>	<i>1 October 2014</i>
<i>Crawley/Reigate and Banstead: Crawley Local Plan</i>	<i>8 October 2014</i>
<i>CBC response to Tandridge District Council's Duty to Cooperate Scoping Report</i>	<i>9 October 2014</i>
Crawley Borough submission draft Local Plan 2015 – 2030 Publication Consultation Ends	13 October 2014
<i>Gatwick Diamond Joint Letter Response to London Infrastructure Plan</i>	<i>29 October 2014</i>
<i>Bedford 51 Joint Letter, on behalf of 60 local authorities in the South East, Response to London Infrastructure Plan</i>	<i>31 October 2014</i>
<i>Northern West Sussex Authorities Planning Officers: Horsham District Planning Framework</i>	<i>31 October 2014</i>

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Milestone	Date
<i>West Sussex County Joint Leaders and Chief Executives</i>	<i>3 November 2014</i>
<i>Crawley/Horsham: attendance at Horsham District Planning Framework Examination Hearing</i>	<i>4 November 2014</i>
<i>Crawley/Horsham: attendance at Horsham District Planning Framework Examination Hearing</i>	<i>5 November 2014</i>
<i>Crawley/Horsham: attendance at Horsham District Planning Framework Examination Hearing</i>	<i>14 November 2014</i>
Reigate and Banstead Borough Council and Crawley Borough Council Statement of Common Ground on Crawley Local Plan	November 2014
Submission of Crawley 2030: Local Plan 2015 – 2030 for Examination	26 November 2014
<i>Gatwick Diamond GROW Strategy Project Group</i>	<i>27 November 2014</i>
<i>West Sussex Planning Policy Officers Group</i>	<i>12 December 2014</i>

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

APPENDIX B: SUMMARY OF JOINT EVIDENCE BASE DOCUMENTS

Document	Joint Authorities	Study Scope
West of Bewbush Joint Area Action Plan (July 2009) Crawley Borough Council and Horsham District Council	Crawley, Horsham	Adopted Area Action Plan Development Plan Document for strategic neighbourhood development adjacent to Crawley within Horsham District.
Strategic Housing Market Assessment (SHMA) (May 2009) GVA	Crawley, Mid Sussex, Horsham	Housing Market & Affordable Housing Need
Strategic Housing Market Assessment (SHMA) Update (October 2012) GVA	Crawley, Mid Sussex, Horsham	Housing Market & Affordable Housing Need
Northern West Sussex Housing Market Area Affordable Housing Needs Model Update (October 2014) Chilmark Consulting	Crawley, Mid Sussex, Horsham	Housing Market & Affordable Housing Need
Employment Land Review Part 1 (September 2009) GL Hearn	Crawley, Mid Sussex, Horsham	Employment Land requirement
Employment Land Review Part 2 (October 2010) GL Hearn	Crawley, Mid Sussex, Horsham	Employment Land requirement
Economic Growth Assessment (January 2014) NLP	Crawley, Mid Sussex, Horsham	Employment Land requirement
At Crawley Study (October 2009) GL Hearn	Crawley, Mid Sussex, Horsham	Strategic Housing Sites/new neighbourhood potential adjacent to Crawley within Crawley, Mid Sussex and Horsham
New Market Town Study (August 2010) GL Hearn	Crawley, Mid Sussex, Horsham	Strategic Housing development/new town potential within Northern West Sussex
Gatwick Water Cycle Study (January 2011) Entec UK Limited	Crawley, Mid Sussex, Horsham, Reigate and Banstead	Understanding issues relating to water infrastructure provision and flood risk
Economic Assessment of Growth at Gatwick Airport (February 2013) Berkeley Hanover Consulting Limited (BHC)	West Sussex County Council, Surrey County Council, Crawley, Mid Sussex, Horsham, Reigate and Banstead	Understanding the economic implications of a second runway at Gatwick, as well as the implications of not having a second runway at Gatwick and the additional runway capacity going elsewhere in the south east.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Document	Joint Authorities	Study Scope
Bio City Study (November 2010) Bio City Development Company	West Sussex County Council, Crawley Borough Council, Horsham District Council	Strategic Health-led, Housing development/new town potential within Horsham District.
Viability Assessment: Community Infrastructure Levy, Affordable Housing and Local Plan viability (October 2013) Nationwide CIL Service	Crawley Borough Council, Horsham District Council	A jointly-commissioned viability study across the two local authority areas to consider CIL, affordable housing and Local Plan viability.
West Sussex Energy Study (October 2009) CSE	Arun District Council, Chichester District Council, Horsham District Council, Mid Sussex District Council, and Worthing Borough Council)	Report considering low carbon technologies (due to Crawley Borough Council's advanced position at that stage rather than being a paying partner in the study information and expertise was shared)
Horsham and Crawley Joint Climate Change Statement (January 2014) Crawley Borough Council and Horsham District Council	Crawley Borough Council, Horsham District Council	Agreement to joint planning principles
West Sussex Landscape Character Assessment (2003) West Sussex County Council	West Sussex County Council	
Local Plan Transport Study	Crawley Borough Council, West Sussex County Council	Transport Modelling Stage 1 and 2.

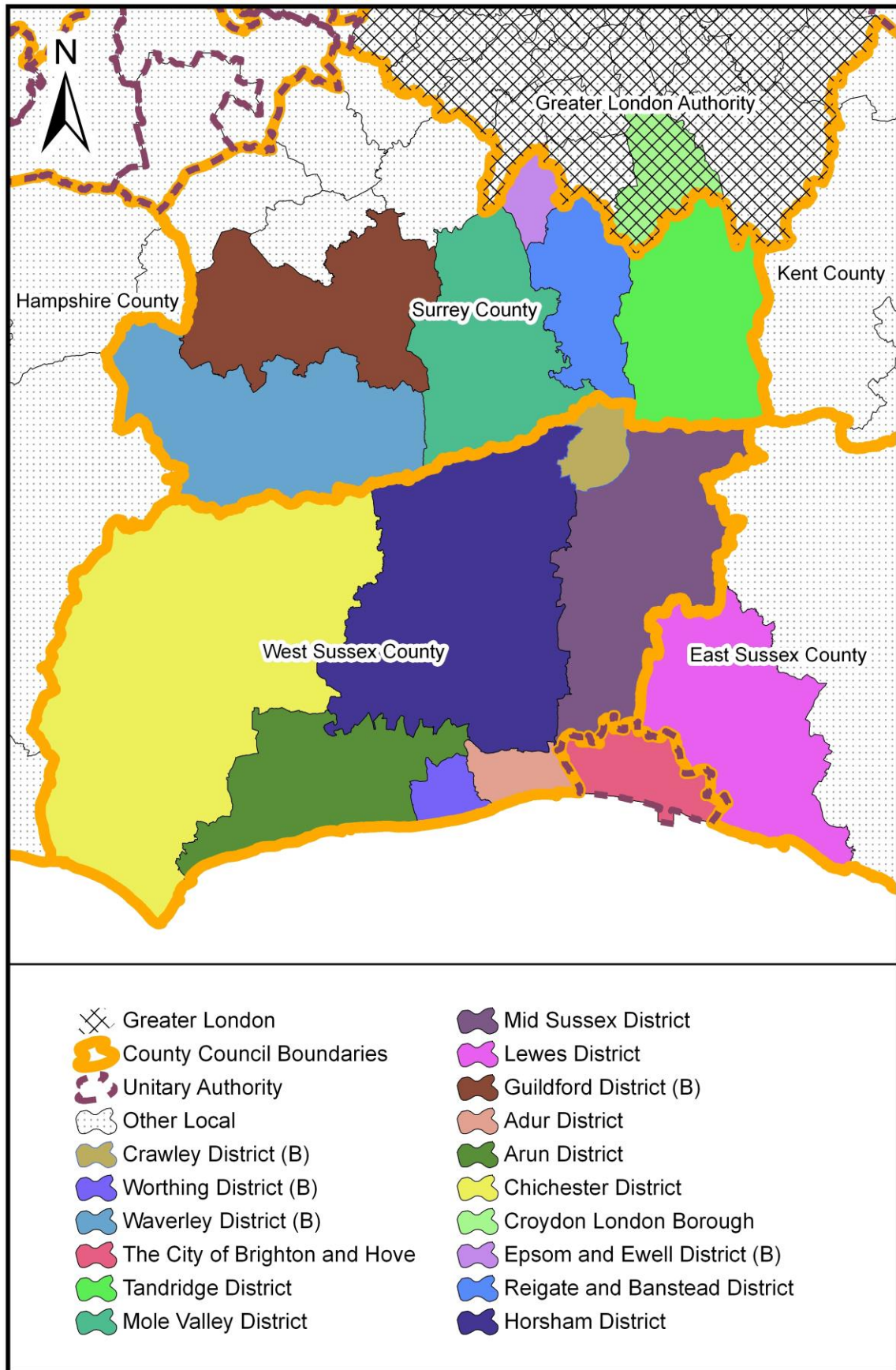
Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

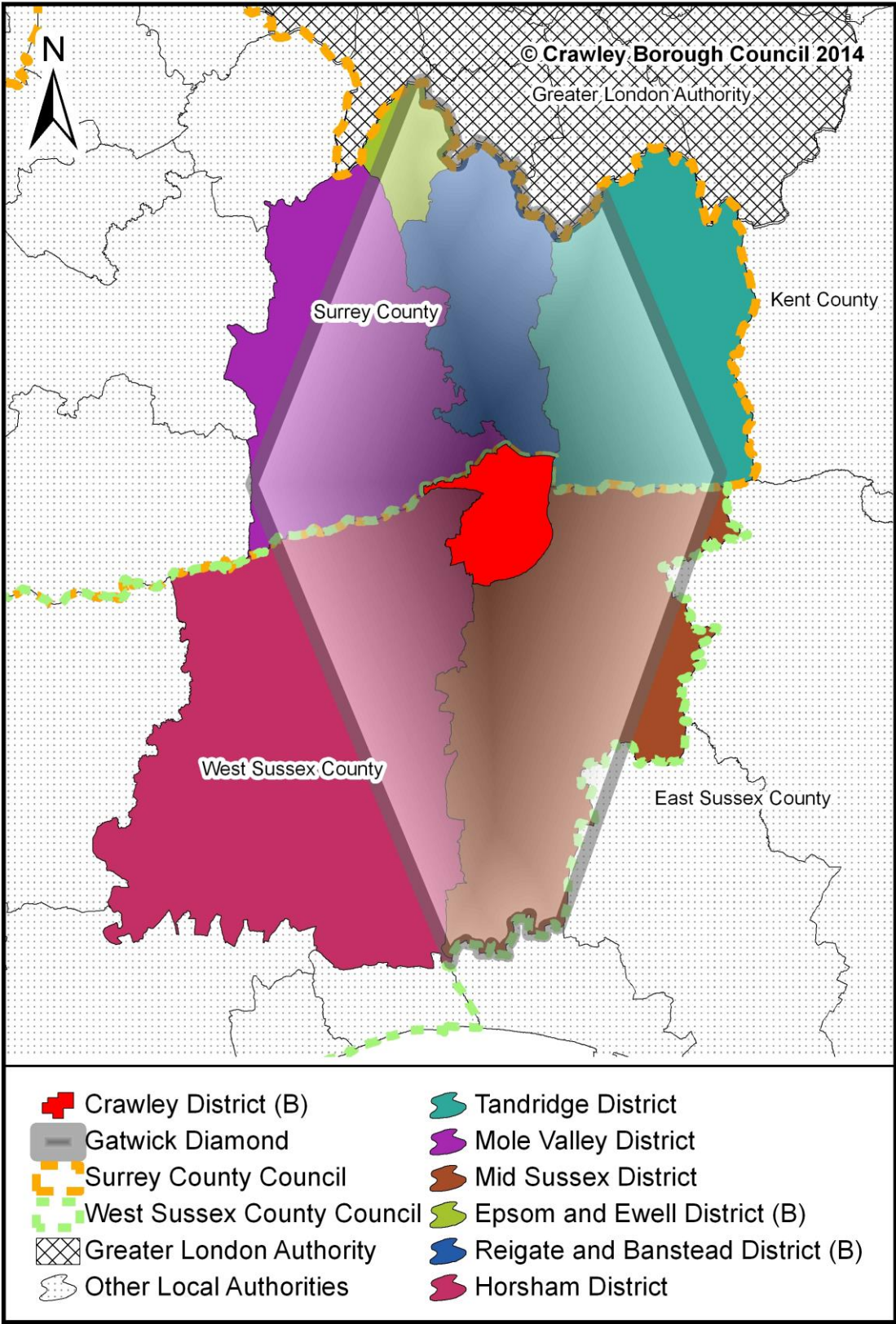
APPENDIX C: LIST OF PRESCRIBED BODIES AND STATUTORY CONSULTEES

Duty to Cooperate Prescribed Bodies	Local Plan Statutory Consultees
<p>County Council: West Sussex County Council</p>	<p>County Council: West Sussex County Council</p>
<p>Adjoining Authorities: Horsham District Council Mid Sussex District Council Mole Valley District Council Reigate and Banstead Borough Council Tandridge District Council Surrey County Council</p>	<p>Adjoining Authorities: Horsham District Council Mid Sussex District Council Mole Valley District Council Reigate and Banstead Borough Council Tandridge District Council Surrey County Council</p>
<p>Other Gatwick Diamond Authorities: Epsom and Ewell District Council</p>	<p>Official Agencies: Environment Agency English Heritage Natural England Network Rail Infrastructure Limited Highways Agency Local Police Authority Strategic Health Authority Communications Water and Energy Providers Homes and Communities Agency.</p>
<p>West Sussex Coastal Authorities: Adur and Worthing Councils Arun District Council Chichester District Council South Downs National Park Authority</p>	
<p>Other Coastal Housing Market Area Authorities: Brighton and Hove City Council Lewes District Council</p>	
<p>Other East Surrey Authorities: Guilford District Council Waverley District Council</p>	
<p>Other Prescribed Bodies: English Heritage Environment Agency Highways Agency Natural England</p>	
<p>Local Economic Partnership: Coast to Capital LEP</p>	

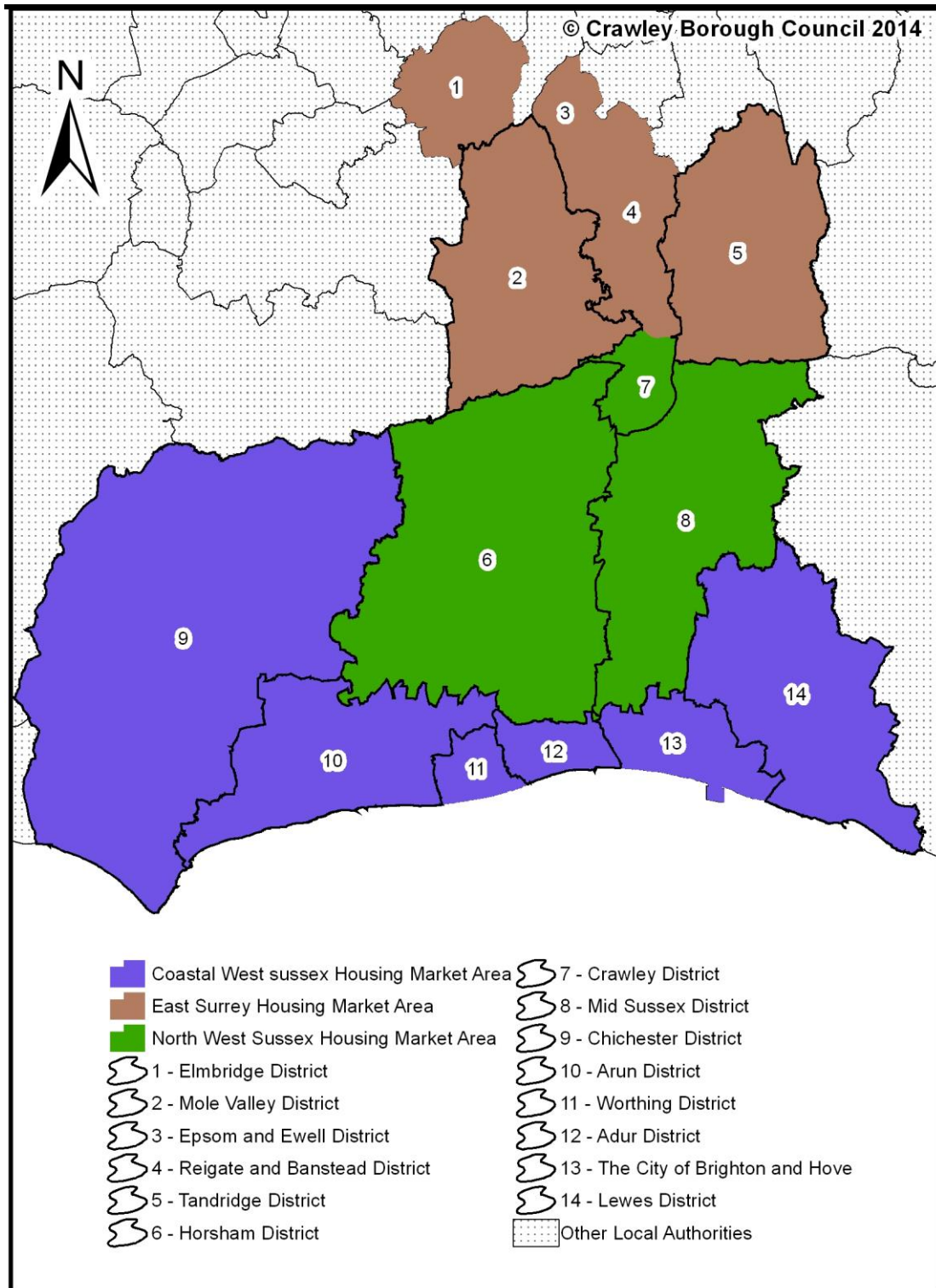
LOCAL AUTHORITY AREAS



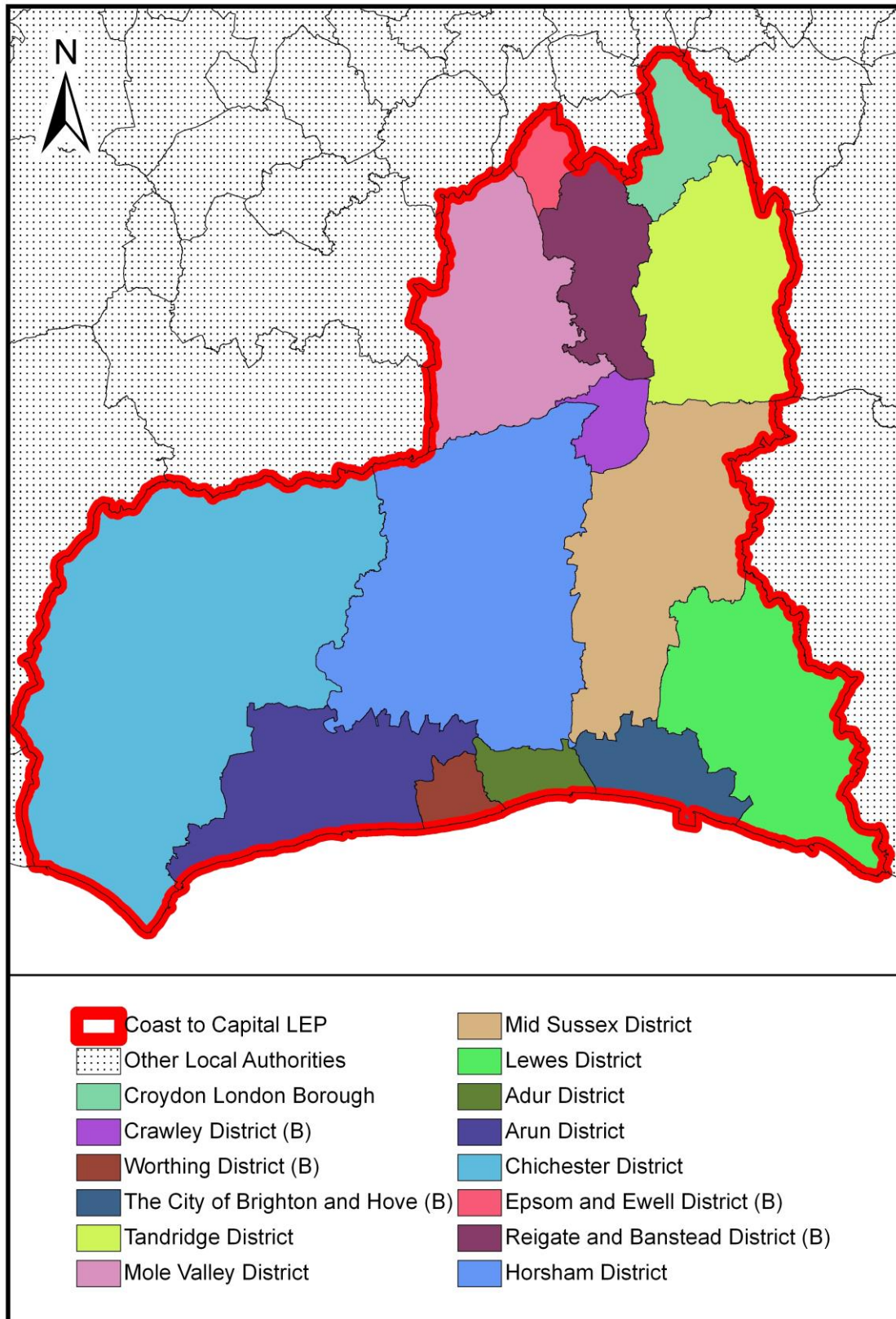
GATWICK DIAMOND AUTHORITIES



HOUSING MARKET AREAS



COAST TO CAPITAL LOCAL ENTERPRISE PARTNERSHIP LOCAL AUTHORITIES



Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

APPENDIX D: STRATEGIC JOINT WORKING MECHANISMS

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
Gatwick Diamond	Gatwick Diamond Members	Councillors: Portfolio Holders for Planning at Epsom and Ewell, Crawley, Horsham, Mid Sussex, Mole Valley, Reigate and Banstead, Surrey, Tandridge, West Sussex Councils.	<ul style="list-style-type: none"> • Memorandum of Understanding. • Local Strategic Statement. • Delivery Programme. 	22 January 2014 17 September 2013 24 July 2013 16 April 2013 25 March 2013 21 May 2012	<ul style="list-style-type: none"> → Memorandum of Understanding (2012) → Gatwick Diamond Local Strategic Statement (2012) → Delivery Plan (2012) → Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26; 2.34–2.35; 5.8–5.22; Policy EC1; 6.34–6.41; Policy H1.
	Gatwick Diamond Initiative: GROW Group	Representatives from the councils and business community across the Gatwick Diamond	<ul style="list-style-type: none"> • Infrastructure needs. 	28 November 2012 26 June 2012	
	Gatwick Diamond GROW Strategy Project Group	Planning Officers from Epsom and Ewell, Crawley, Horsham, Mid Sussex, Mole Valley, Reigate and Banstead, Surrey, Tandridge, West Sussex Councils.	<ul style="list-style-type: none"> • Preparation of Memorandum of Understanding and Local Strategic Statement. • Supporting preparation of Local Plans. • Sharing of information. • Understanding critical cross boundary and strategic issues, including: <ul style="list-style-type: none"> ○ Building the Diamond Economy ○ People, Places 	22 September 2014 28 July 2014 18 June 2014 12 May 2014 5 March 2014 7 January 2014 21 August 2013 18 June 2013 23 April 2013 10 April 2013 23 January 2013 19 November 2012 19 September 2012 18 July 2012 11 June 2012 17 April 2012	<ul style="list-style-type: none"> → Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26; 2.34–2.35; 5.8–5.22; Policy EC1; 6.34–6.41; Policy H1. → Reigate and Banstead Borough Council adopted Core Strategy (2014) paras: 7.4.1–7.4.4. → Horsham District submission Horsham District Planning Framework (paras 6.3 and 6.6)

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
			<ul style="list-style-type: none"> ○ and Communities ○ Transport and Communications ○ Countryside and Landscape ○ Towards a Low Carbon Economy. 	27 February 2012 23 January 2012 14 November 2011 26 September 2011 6 September 2011	
Northern West Sussex Authorities	Chief Execs Strategic Planning		<ul style="list-style-type: none"> • Duty to Cooperate Position Statement: Housing Numbers and Economic Growth. • Travellers. 	8 July 2013 13 March 2013 10 December 2012	→ Duty to Cooperate Position Statement Update (2014): signed by the Planning Portfolio Holders of the councils. → Duty to Cooperate Position Statement (2013): signed by Leaders of the councils. → Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26; 2.34–2.35; 5.8–5.22; Policy EC1; 6.34–6.41; Policy H1.
	Northern West Sussex Planning Officers	Planning Officers from Crawley Borough Council, Horsham District Council and Mid Sussex District Council	<ul style="list-style-type: none"> • Duty to Cooperate Position Statement: Housing Numbers and Economic Growth. • Travellers. 	16 July 2014 4 April 2014 11 March 2014 29 November 2013 11 September 2013 13 August 2013 3 July 2013 10 July 2013 14 June 2013 24 April 2013 28 March 2013 4 December 2012 18 July 2012 13 July 2012	→ Joint Strategic Sites SHLAA Appendix → Housing Needs Update technical appendix paper (2013) → Crawley submission Local Plan (2014): paras: 5.8–5.22; Policy EC1; 6.34–6.41; Policy H1; 6.68–6.73; Policy H5.

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				29 March 2012	
			<ul style="list-style-type: none"> • SHMA. 	5 September 2014 18 July 2014 27 May 2014 31 July 2012 1 February 2012 19 January 2012	→ Joint Strategic Housing Market Assessment (GVA, 2009); 2012 Update (GVA); and 2014 Affordable Housing Needs Update (2014) → Crawley submission Local Plan (2014): paras: 6.14–6.18; Policy H1; 6.51 – 6.68; Policy H3; Policy H4.
			<ul style="list-style-type: none"> • Economic Growth Assessment/ (workshop). • Employment Land Review. 	22 April 2014 10 February 2014 22 August 2013 4 July 2013 12 June 2013 10 May 2013 13 May 2013 26 March 2013 27 November 2012	→ Joint northern West Sussex Economic Growth Assessment (NLP, 2013) → Joint Employment Land Review (GL Hearn, 2009 and 2010) → Crawley submission Local Plan (2014): paras: 5.8–5.22; Policy EC1.
			<ul style="list-style-type: none"> • Strategic Sites. 	14 August 2014 1 July 2014 21 May 2014 7 May 2014 1 April 2014	→ SHLAA Joint Appendix K: Strategic Sites/Broad Locations in the Housing Market Area → At Crawley Study (2009) → New Market Town Study (2010) → Crawley submission Local Plan (2014): paras: 2.25–2.26; 6.21; 6.37; 6.40; 6.41; Policy H1.
West Sussex County Wide	Leaders and Chief Executives	Councillors: Leaders of West Sussex District and County Councils	Duty to Cooperate is a standard item on the agenda at these meetings.	3 November 2014 22 September 2014 (Chief Executives)	
	Joint Planning Board	Councillors: Portfolio Holders for Planning	<ul style="list-style-type: none"> • Duty to Cooperate Housing Agreement. 	22 November 2013 July 2013	→ West Sussex Joint Planning Board Terms of Reference

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		at West Sussex District and County Councils Chief Planning Officers at West Sussex District and County Councils	<ul style="list-style-type: none"> • CIL. • Local Plans. 	13 November 2012 25 October 2012 13 July 2012 20 April 2012	<ul style="list-style-type: none"> → Duty to Cooperate Agreement for Joint Working (2013) → Agreement to extend membership and invitation to Brighton and Hove, Lewes and East Sussex Councils. → Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26.
	Chief Planning Officer Group	Chief Planning Officers at West Sussex District and County Councils	<ul style="list-style-type: none"> • Duty to Cooperate Housing Agreement. • Links with LEP. • Extensions beyond West Sussex Authorities. 	13 May 2014 9 January 2013 5 July 2013 6 July 2012 12 April 2012	→ Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26.
	Planning Policy Officers Group	Local Plan Lead Planning Officers at West Sussex District and County Councils	<ul style="list-style-type: none"> • Duty to Cooperate is a standard item on the agenda. • Local Plan Timetables and progress. • Evidence Base Updates. • Information Sharing. 	12 September 2014 6 June 2014 7 March 2014 12 December 2013 6 September 2013 7 June 2013 8 March 2013 7 December 2012 7 September 2012 9 March 2012 2 December 2011 2 September 2011	
	Planning Policy Officers CIL Group	CIL Lead Planning Officers at West Sussex District and County Councils	<ul style="list-style-type: none"> • Delivery of critical Infrastructure. • CIL Viability Testing. • Preparation of CIL Charging Schedules. • Governance. 	24 September 2014 5 December 2013 9 January 2013 29 March 2012 1 November 2011 15 July 2011 7 April 2011	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
	West Sussex Strategic Flood Risk Management Board	Senior officers from WSCC, all Borough and Districts Councils, EA and Southern Water.	<ul style="list-style-type: none"> The group's role is to take a strategic overview of the entirety of flood risk and drainage management across West Sussex. 	31 March 2014 16 December 2013 8 July 2013 26 March 2013 16 January 2013 30 September 2011 20 April 2011 16 December 2010	→ Joint Flood Risk Management Work Programme (to be worked on in 2014) → Local Flood Risk Management Strategy (2013/2014) → Delegated powers to District and Borough for Ordinary Watercourse Consenting (2012) – with legal agreement → West Sussex Interim Position Statement on SuDs (2011) → Preliminary Flood Risk Assessment (2011)
	West Sussex Flood Risk Management Operational Group	WSCC, the EA (Southern & Thames), Southern Water Services and all the Borough and District Councils within West Sussex.	<ul style="list-style-type: none"> Its role is to plan and act to reduce the risk and consequence of flooding now and in the future in West Sussex. 	11 March 2014 20 December 2013 10 September 2013 11 June 2013 11 February 2013 13 December 2011 13 April 2011 20 December 2010 30 September 2010 20 January 2010 26 November 2009	
Sussex Wide		East & West Sussex District and County Councils	<ul style="list-style-type: none"> Noise and Air Quality. 		→ Air Quality and Emissions Guidance for Sussex (2013) Sussex Air → Planning and Noise Advice Document: Sussex (2013) East and West Sussex Authorities → West Sussex Energy Study → Crawley submission Local Plan

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
					(2014): paras: 7.87; Policy ENV11; 7.91; Policy ENV12.
	Biodiversity Record Centre	East & West Sussex District and County Councils	<ul style="list-style-type: none"> Biodiversity 	21 January 2014 1 October 2013	→ SBRC datasets that meet Local Authority's needs. → Crawley submission Local Plan (2014): paras: 7.18–7.19; Policy ENV2.
	Green Infrastructure Network	Adur District Council; Arun District Council; Chichester District Council; Crawley Borough Council; East Sussex County Council; Horsham District Council; Mid Sussex District Council; Natural England; South Downs National Park Authority; Sussex Wildlife Trust; West Sussex County Council; Worthing Borough Council	<ul style="list-style-type: none"> Green Infrastructure Issues 	27 June 2013 23 January 2013 26 March 2012	→ Information sharing → Crawley submission Local Plan (2014): paras: Policy ENV1.
	Coastal & Northern West Sussex Authorities	Chief Planning Officers and Local Plan Lead Planning Officers at: Adur and Worthing, Arun, Brighton and Hove, Chichester. Crawley, Horsham, Lewes, Mid	<ul style="list-style-type: none"> Horsham DtC. Brighton and Hove DtC. Housing Numbers. 	9 January 2014 9 August 2013 23 July 2013 6 December 2012 18 June 2012	→ Provision of Housing – A Statement of Common Ground (2013): signed by Portfolio Holder

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Sussex, South Downs National Park, and West Sussex Councils			
Sussex and Surrey Wide			<ul style="list-style-type: none"> Gypsy & Travellers Needs Assessment. 		→ Similar methodology for undertaking initial Gypsy, Traveller and Travelling Showpeople Needs Assessments. → Crawley submission Local Plan (2014): paras: 6.68 – 6.73; Policy H5.
	Mid Sussex Gypsy and Traveller Assessment		<ul style="list-style-type: none"> Gypsy & Traveller site needs Site Assessments Traditional Movements and Incursions 	17 January 2013 27 February 2013	→ Telephone interview to support the preparation of the Mid Sussex Gypsy and Traveller site assessment → Attendance at Workshop – clear outcomes of site suitability criteria and known patterns of Traveller movements across the sub-region, from north-south and east-west, along with historic reasons for patterns and implications of modern life. → Mid Sussex District Council Gypsy and Traveller consultation documents (2013/2014)
Coast to Capital Local Enterprise Partnership		Chairman & Vice Chairman Private Sector – Business Representatives Public Sector –	Coast to Capital extends from London to the South East Coast. The role of Local Enterprise Partnerships is to re-balance the economy and		→ Crawley submission Local Plan (2014): paras: 2.5–2.7.

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Leader Representatives Higher/Further Education Representative	to promote private sector employment growth. The LEP vision is to create an outward facing, high performing international business economy, with a reputation for being a good place to do business. Business and economic performance will be transformed so the area can compete in the global marketplace.		
Kent, Surrey and Sussex Wide	AONB Joint Advisory Committee	Ashford Borough Council; Crawley Borough Council; East Sussex County Council; Hastings Borough Council; Horsham District Council; Kent County Council; Mid Sussex District Council; Rother District Council; Sevenoaks District Council; Surrey County Council; Tandridge District Council; Tonbridge and	<ul style="list-style-type: none"> High Weald AONB issues 	12 November 2014 8 November 2013 25 March 2013 14 November 2012 23 March 2012	→ Crawley submission Local Plan (2014): paras: 4.46 – 4.48; Policy CH10.

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Malling Borough Council; Tunbridge Wells Borough Council; Wealden District Council; West Sussex District Council			
	AONB Officer Steering Group	As above	<ul style="list-style-type: none"> High Weald AONB issues. 	25 September 2014 8 October 2013 25 February 2013 17 October 2012 10 May 2012	→ High Weald AONB Management Plan
Adjoining Authorities (1-1)	Horsham/Crawley	Portfolio Holder Member and Planning Officer Leads from Crawley Borough Council and Horsham District Council	<ul style="list-style-type: none"> Horsham Preferred Option Local Plan. 	1 August 2013	→ West of Bewbush Joint Area Action Plan (2009) adopted by both Full Councils → Bio City Study (with West Sussex County Council) → Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26; 2.34–2.35; 5.8–5.22; Policy EC1; 6.34–6.41; Policy H1.
		Planning Officer Leads from Crawley Borough Council and Horsham District Council	<ul style="list-style-type: none"> West of Ifield (with and without developers). Infrastructure capacity. Strategic objectively assessed needs. 	1 October 2014 15 July 2014 7 May 2014 30 January 2013 17 September 2012 16 November 2011 4 October 2011	→ Understanding of potential strategic site and necessary infrastructure and planning policy considerations should it progress through the Horsham District Planning Framework process or be submitted as a planning application. → Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26; 2.34–2.35; 6.34–6.41; Policy H1.

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Planning Officers from Crawley Borough & Horsham District Councils	<ul style="list-style-type: none"> Viability Study (workshop). 	19 March 2013	→ Joint Viability Study (2013)
		Planning Officer Leads from Crawley Borough & Horsham District Councils	<ul style="list-style-type: none"> Climate Change meetings with officers and environmental managers. 	Monthly meetings ongoing	→ Horsham and Crawley Climate Change and Decentralised Energy Statement (2013) → Crawley submission Local Plan (2014): paras: Policy ENV6; Policy ENV7; Policy ENV9.
	Adur/ Crawley/ Horsham/ Worthing	Planning Officer Leads & Planning Policy Housing Officers from Crawley Borough, Adur and Worthing, & Horsham District Councils	<ul style="list-style-type: none"> Housing Needs forecasts – predictions; type Housing Supply – urban capacity; constraints Redistribution – what type, where? 	22 January 2013	→ Understanding of timetables and positions of Local Plan progressions across the four authority areas. → Understanding of quantum and types of housing needs arising. → Understanding of supply and physical and market constraints across the four areas. → Agreement for scoping of future working – following understanding of wider West Sussex and Gatwick Diamond/Coastal Sussex decisions. → Agreement to extend invitation to Mid Sussex and Brighton and Hove for inclusion in wider conversation.
	Mid Sussex/ Crawley	Portfolio Holder Member and Planning Officer Leads from Crawley Borough & Mid Sussex District	<ul style="list-style-type: none"> Housing Development potential adjacent to Crawley Neighbourhood Plans 	22 May 2013	→ Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26; 2.34–2.35; 5.8–5.22; Policy EC1; 6.34–6.41; Policy H1.

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Councils			
		Planning Officer Leads from Crawley Borough & Mid Sussex District Councils	<ul style="list-style-type: none"> • Mid Sussex District Plan. • Mid Sussex Gypsy, Traveller & Travelling Showpeople Workshop. • Mid Sussex Gypsy & Traveller tele-interview. • Transport Modelling. 	11 June 2013 27 February 2013 17 January 2013 6 November 2012 16 October 2012 1 December 2011	→ Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26; 2.34–2.35; 5.8–5.22; Policy EC1; 6.34–6.41; Policy H1; 6.68–6.73; Policy H5.
	Mid Sussex Neighbourhood Plans	Copthorne/ Crawley/ Mid Sussex	<ul style="list-style-type: none"> • Potential strategic development site adjacent to Crawley boundary and consideration of infrastructure capacity. • Timetable for the Copthorne Neighbourhood Plan. • Attendance at Copthorne Neighbourhood Plan stakeholder workshop. 	10 March 2014 22 May 2013 22 November 2011	→ Understanding of potential strategic site and necessary considerations should it progress through the Neighbourhood Plan process or be submitted as a planning application. → Crawley submission Local Plan (2014): paras: 2.5–2.7; 2.22–2.26; 2.34–2.35; 6.34–6.41; Policy H1.
	Reigate & Banstead/ Crawley	Portfolio Holder Member and Planning Officer Leads from Crawley Borough Council and Reigate & Banstead Borough Council	<ul style="list-style-type: none"> • Statement of Common Ground on Crawley Local Plan issues – housing; employment; retail and Gypsies and Travellers • Statement of Common Ground on Housing 		→ RBBC and CBC Statement of Common Ground on Crawley's Local Plan (2014) → RBBC and CBC Statement of Common Ground on meeting the Duty to Cooperate and Retail issues relating to Reigate and Banstead Borough Council Draft Core Strategy

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
			<ul style="list-style-type: none"> needs. Statement of Common Ground on Duty to Cooperate and Retail issues. 		(2012) → RBBC and CBC Statement of Common Ground on meeting strategic housing needs (2013) → Reigate and Banstead Borough Council adopted Core Strategy (2014) paras: 7.4.1–7.4.4. → Crawley submission Local Plan (2014): paras: 2.23; 2.24; 2.26.
		Planning Officer Leads from Crawley Borough Council and Reigate & Banstead Borough Council	<ul style="list-style-type: none"> Crawley Local Plan: housing, employment, retail and Gypsies and Travellers Reigate & Banstead Core Strategy. Housing Market Area. Housing Numbers. Retail. 	8 October 2014 28 February 2014 8 January 2013 19 September 2012 29 August 2012 (attendance at Exploratory Meeting for RBBC Core Strategy) 10 August 2012 17 April 2012 20 December 2011	
	Crawley/Brighton	Planning Officer Leads from Crawley Borough Council and Brighton & Hove City Council	<ul style="list-style-type: none"> Housing need and constraints. London pressures. 	22 August 2014	
	Crawley/Mole Valley	Planning Officer Leads from Crawley Borough Council and Mole Valley District Council	<ul style="list-style-type: none"> Local Plan Updates, timetables and strategies. Housing need and constraints: <ul style="list-style-type: none"> - Green Belt; 	9 September 2014	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
			<ul style="list-style-type: none"> - Gatwick Airport; - Noise and Flooding. • London pressures. • Gypsy & Traveller Needs. 		
Infrastructure Providers/ Stakeholder Agencies	EA		<ul style="list-style-type: none"> • SFRA. • Water Cycle Study. • Flood Risk Management and Reduction at Gatwick Airport. 	26 April 2012 23 February 2012 24 November 2011 3 June 2010 26 April 2010 15 March 2010 5 February 2010 14 February 2011 23 September 2010 24 August 2010 21 July 2010 20 May 2010 12 May 2010 9 April 2010 25 March 2010 24 February 2010 6 January 2010 12 November 2009	→ Strategic Flood Risk Assessment (2007) and Update (2013) → Outline Gatwick Water Cycle Study (2011) → Flood Risk Management and Reduction at Gatwick Airport → Crawley submission Local Plan (2014): paras: 7.56 – 7.74; Policy ENV8; Policy ENV9.
	West Sussex County Council Local Highway Authority	Crawley Borough Council, West Sussex County Council, Amey Consulting	<ul style="list-style-type: none"> • To jointly commission and approve the Crawley Local Plan Transport Studies Part 1 and 2. 	18 September 2014 14 November 2013 29 May 2013 (Infrastructure general) 13 December 2012 25 July 2012 1 June 2012 21 May 2012	→ Transport Modelling Part 1 (2012) Amey Consulting → Transport Modelling Part 2 (2014) Amey Consulting → Local Plan Policies: IN1, IN3, IN5, IN6. → Supporting evidence for delivery of development allocation sites (housing and economic).

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				24 January 2012	→ Infrastructure Plan → Local Plan viability study → Emerging Strategic Infrastructure Package (WSCC Schedule of identified schemes)
	Thames Water		<ul style="list-style-type: none"> Wastewater Treatment Works and sewage capacity and implications of upgrades and improvements to technology alongside the changing development levels in the Local Plan. 	4 May 2012	→ Infrastructure Plan – position statement
	Southern Water		<ul style="list-style-type: none"> Southern Water Asset Management Plan and Local Plan Water Management Policy approach. 	2 May 2013	→ Infrastructure Plan – position statement
	Upper River Mole Strategy Working Group	Crawley Horsham Mid Sussex Mole Valley Reigate and Banstead Surrey Tandridge West Sussex Environment Agency Gatwick Airport	<ul style="list-style-type: none"> Working group of local authorities on flood prevention in upper Mole area. Production of the Strategic Flood Risk Assessment River Catchment Management. 	Regular meetings in build up to SFRA commission. Twice yearly meetings post SFRA completion.	→ Upper River Mole Strategy Working Group Terms of Reference → SFRA (2007)
	Upper Mole Flood Alleviation Scheme	Environment Agency Crawley Horsham Mid Sussex Gatwick Airport	<ul style="list-style-type: none"> Environment Agency-led initiative: 5 separate components designed to reduce 		→ Upper Mole Flood Alleviation Scheme – completion of three schemes. A further scheme anticipated to commence in 2014.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
			flooding caused within Crawley.		→ The final scheme no longer considered to be viable in full, therefore alternative options are currently being considered.
	Gatwick Water Cycle Study	Crawley Horsham Mid Sussex Reigate and Banstead Environment Agency East Sutton and Surrey Water Thames Water Southern Water South East Water	<ul style="list-style-type: none"> • River Catchment Management. • River Flooding. • Water Supply Capacity. • Surface Water Drainage. • Wastewater. 	28 July 2010 3 June 2010 22 April 2010 15 March 2010 5 February 2010	→ Gatwick Water Cycle Scoping Study (2010) → Outline Gatwick Water Cycle Study (2011) → Crawley submission Local Plan (2014): paras: 7.56 – 7.74; Policy ENV8; Policy ENV9.
Gatwick Greenspace Partnership	Gatwick Greenspace Partnership	Sussex Wildlife Trust Crawley Horsham Reigate and Banstead Mole Valley West Sussex County Surrey County Horley Town Council Charitable Trust	<ul style="list-style-type: none"> • Partnership of local authorities and interested groups promoting environmental improvements in the Gatwick area. • Led by Sussex Wildlife Trust. 		
Gatwick Airport	Gatwick Airport Consultative Committee	Local authorities, business, tourism, community, environmental, Gatwick Airport Ltd (GAL), Department for Transport.	<ul style="list-style-type: none"> • Statutory consultative body for Gatwick Airport (Civil Aviation Act 1982), 28 representatives from wide range of interests. 	4 meetings per year. Last 2 years: 24 July 2014 10 April 2014 30 January 2014 17 October 2013 23 July 2013 16 April 2013 31 January 2013	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				18 October 2012 19 July 2012 26 April 2012 26 January 2012	
	Noise and Track Monitoring Advisory Group	Gatwick Airport Limited, Dept for Transport, CAA, NATS, Airlines, Nominated representatives from Gatcom incl. local authorities.	<ul style="list-style-type: none"> Group monitoring airport-related noise and flight path tracking. 	4 meetings per year: 13 May 2014 27 February 2014 28 November 2013 12 September 2013 16 May 2013 14 February 2013 29 November 2012	
	Gatwick Joint Local Authorities Meeting	Crawley Borough Council, East Sussex County Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Surrey County Council, Tandridge District Council, West Sussex County Council.	<ul style="list-style-type: none"> Member group supporting Gatwick Officer Group. 	2 meetings per year. Last 2 years: 26 March 2014 11 September 2013 27 March 2013 24 October 2012 30 May 2012	<ul style="list-style-type: none"> → Gatwick Memorandum of Understanding. → Monitoring S106 Agreement Actions and Implementation. → Discussion and liaison on matters relating to Gatwick Airport. → Greater knowledge across county boundaries. → Crawley submission Local Plan (2014): paras: 9.12 – 9.15; Policy GAT1.
	Gatwick Officers Group	Crawley Borough Council, East Sussex County Council,	<ul style="list-style-type: none"> Officer group supporting GJLA, also monitoring S106 	4 meetings per year. Last 2 years:	<ul style="list-style-type: none"> → Gatwick Memorandum of Understanding. → Monitoring S106 Agreement Actions

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Surrey County Council, Tandridge District Council, West Sussex County Council.	actions and implementation.	4 June 2014 26 March 2014 12 November 2013 4 September 2013 11 June 2013 23 January 2013 6 November 2012 6 September 2012 1 May 2012 23 February 2012	and Implementation. → Discussion and liaison on matters relating to Gatwick Airport. → Greater knowledge across county boundaries.
	Gatwick Airport Transport Forum Steering Group	Gatwick Airport Limited, Metrobus, Highways Agency, Network Rail, West Sussex County Council, Surrey County Council, TfL, Crawley Borough Council	<ul style="list-style-type: none"> Forum to discuss improvements to surface access and future transport links with and in vicinity of the airport. 	17 July 2014 9 April 2014 8 January 2014 18 September 2013 17 July 2013 24 April 2013 9 January 2013 5 September 2012 9 May 2012	
	Gatwick Airport Sub-Groups	Gatwick Airport Limited and members of Gatwick Officers Group	<ul style="list-style-type: none"> To liaise with Gatwick Airport and more fully understand Gatwick's proposals for a second runway in the context of the Airports Commission process and to share this with other local authorities. 	Transport Working Group: 17 July 2014 19 March 2014 29 January 2014 11 December 2013 16 October 2013 18 September 2013 Employment and Housing: 9 July 2014	→ Greater understanding of second runway issues

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				27 January 2014 3 December 2013 13 September 2013 Noise: 27 March 2014 Air Quality: 18 June 2014 13 December 2013 Land Use: 13 December 2013	
	Gatwick Airport 1-1 Local Plan discussions (In addition to these CBC Chief Exec meets with senior Gatwick officials twice yearly, and there are regular monthly meetings between Gatwick Airport and CBC Principal Planning Officer).		<ul style="list-style-type: none"> • Crawley Borough Local Plan. • Safeguarding Land for potential Second Runway. • Non-airport Employment Use of Land within the Airport Boundary. • Airport Parking. • Noise Contours and Implications. • Flood Risk Management and Reduction at Gatwick Airport. 	6 September 2013 (noise contours) 25 January 2013 16 November 2012 2 February 2012 14 February 2011 23 September 2010 24 August 2010 21 July 2010 20 May 2010 12 May 2010 9 April 2010 25 March 2010 24 February 2010 6 January 2010 12 November 2009	<ul style="list-style-type: none"> → 2008 Legal Agreement between CBC, WSCC and the airport provider. → Gatwick Airport SPD. → Upper River Mole Strategy Working Group Terms of Reference. → Upper Mole Flood Alleviation Scheme. → Flood Risk Management and Reduction at Gatwick Airport.
Crawley Borough Local Plan Consultations	Email notifications prior to formal consultation periods	All Gatwick Diamond and West Sussex Authorities and Prescribed Bodies	<ul style="list-style-type: none"> • Preferred Strategy document. • Draft Duty to Cooperate Statement • Second Draft Duty to 	28 September 2012 23 December 2013 19 August 2014	→ Detailed responses back from neighbouring authorities raising cross-boundary concerns and support on which further detailed discussions could be held to

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
			Cooperate Statement		address issues. → Detailed responses back from prescribed bodies on the factual and detail of the initial officer-level draft DtC Statement (set out in Appendix E)

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

APPENDIX E: PRESCRIBED BODIES RESPONSES TO DRAFT DUTY TO COOPERATE STATEMENT

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
Adur District Council and Worthing Borough Council	3/1/14	Thanks for the opportunity to comment on your Duty to Co-operate Statement. I attach officer comments from the Adur and Worthing Planning Policy team which I hope you will find useful. Generally we consider the Statement to be very clear and comprehensive and a good example of what such a Statement should be like. However you may wish to note the attached comments and in particular the need to strengthen the Statement with regard to links to the coast.		
		This is a very good and comprehensive Statement. However you may wish to note the following comments which we hope you will find useful:		
		Summary: should there be a little more on links to the coast – referring to the Coastal West Sussex Local Strategic Statement which has recommendations for working with LPAs to the north (e.g. in paras 2.17 and 2.18). The last bullet on page 3 just refers to the Agreements for continual joint working with West Sussex etc. but more could be included here and elsewhere on the CWS Local Strategic Statement and links. The housing markets areas overlap and whilst acknowledging the housing shortfalls on the coast (as well as in Crawley) there could be greater clarity as to the economic and housing links between the 2 sub regions (actually referred to later on page 11).	✓ ✓ ✓	
		Given the delay to the Crawley Local Plan, greater reference could be given to joint Officer meetings now taking place between the coastal and north Sussex LPAs to understand the housing needs and capacity issues and to discuss solutions. The first meeting took place last August where concepts such as new	✓	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		settlements/neighbourhoods were discussed.		
		Page 5: para 3. Insert word 'out' after setting.	✓	
		Page 6: second para refers to the need for longer term solutions to meet housing needs. The CWS Local Strategic Statement refers to short as well as long term solutions needed. Therefore is the issue being kicked into the long grass notwithstanding the need to get current local plans adopted?	✓	
		Page 16 – table: For the West Sussex section, the Members now include Lewes and Brighton and Hove.	✓	
		Page 19 - para 3.7: Is it worth putting more here on the outcomes of these Duty to Co-operate requests notwithstanding that these requests are not easy to collate information for – they have been varied and at different times?	✓	
		Page 23 - para A8: suggest you include a reference to a number of coastal districts in West Sussex with similar constraints e.g. Adur and Worthing.	✓	
		Page 28: this page refers to the housing targets for the 3 LPAs of Horsham, Crawley and Mid Sussex but to what extent do these figures relate to actual capacity. Mid Sussex may be exceeding its objectively assessed needs but do the target housing provision targets reflect capacity or other issues such as market delivery and the need for sustainability.	✓	
		Page 29 – para A.30: The first sentence of the Action should also refer to on-going discussions with other LPAs e.g. in West Sussex which will be impacted – if such strategic housing development is to help meet coastal needs.		This action relates to exploring the potential for meeting Crawley's needs immediately adjacent to its boundaries through urban extensions, in terms of assessing factual matters such as infrastructure and environmental capacity. The second action relates to the wider discussions necessary with the wider sub-regional authorities.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		Page 29 – para A.32: The reference to a series of meetings may not be quite accurate – but rather a number of meetings have taken place. Some meetings that have been held are PAS training events rather than progressing outcomes for duty to co-operate purposes.	✓	
		Page 35 – para C11: Add word ‘been’ to penultimate line.	✓	
		Page 38 – para D3: Need to up-date the Airport reporting dates.	✓	
		Page 60 – Appendix A: Useful to add dates for a number of studies listed.	✓	
Reigate and Banstead Borough Council	6/1/14	General points: it is Reigate and Banstead <u>Borough</u> and Epsom and Ewell <u>Borough</u>	✓	
		Top of page 6: amend as follows, to better reflect exactly what our CS says: ‘... the Reigate and Banstead Core Strategy also now contains an acknowledgement that its <u>housing figure, which allows for some continuing in-migration, would contribute to meeting unmet needs of other local authorities, including those within the wider East Surrey and North West Sussex HMAs</u> .of its contribution to meeting unmet need from within the North West Sussex housing market area’ Page 8 – second para: also refer to implications for Mole Valley (as well as R&B)?	✓	
		Para 2.6 first bullet: ‘...Reigate and Banstead <u>Borough</u> Council...’	✓	
		Para 2.6 first bullet: the clause ‘...and establishing the recognition in the Reigate and Banstead <u>Borough</u> District Council Core Strategy...of Crawley’s housing need’ needs clarification. Our CS recognises the principle that in making provision for some in-migration our housing target will help accommodate unmet need in neighbouring authorities, but that provision is not	✓	

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		allocated specifically to CBC's needs.		
		Para A17: ' <u>...Reigate and Banstead Borough Council...</u> '	✓	
		Para A25: suggest this wording mirrors the actual SCG and RBBC CS wording as closely as possible, e.g.: 'Acknowledgement that the Reigate and Banstead housing figure reflects the level of constraint within that borough, but in providing for some in-migration as well as internally generated natural change the housing would contribute towards meeting unmet needs of other local authorities including those within the wider East Surrey and North West Sussex HMA...' etc.	✓	
		Para A30: 'Whilst some of the shortfall is anticipated to be met <u>may be able to be met</u> within the southern part of Reigate and Banstead (particularly in the Horley area) this is not anticipated to meet the full unmet objectively assessed need for the Northern West Sussex Housing Market Area given the level of constraint in <u>Reigate & Banstead and the characteristics of the East Surrey and North West Sussex HMAs.</u> '	✓	
		Para B9: just by way of clarification, we are not planning on doing a specific Gypsy and Traveller DPD – it will be included within our Development Management Policies DPD.	✓	
		Para C9: ' <u>...in relation to the scale, and extent and phasing of retail development...</u> CBC submitted a representation to the Reigate and Banstead Core Strategy (<u>subsequently resolved</u>) seeking securing clarity ...'	✓	
		Para C16: 'Minor amendments to the RBBC Core Strategy <u>agreed between the authorities</u> requested by Crawley Borough Council have ...'	✓	
		Green infrastructure section – general comment: list of authorities on p55 seems to suggest that GI stops at the		Reigate and Banstead are the first Local Authority referred to at the top of Page 55.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		county boundary. We are doing a GI strategy, and can share with you any cross boundary priorities that we identify in the south of RBBC so ensure joined up GI planning as far as possible.		The other references relate specifically to members of organised groups. Information noted.
		P79: yes, we did meet on 10 August 2012!	✓	
Natural England	9/1/14	Thank you for consulting Natural England on your Duty to Cooperate Statement. I have no comments.		Response noted and acknowledged.
Thames Water	9/1/14	Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above on behalf of Thames Water. As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory sewerage undertaker for the Borough and are hence a " specific consultation body " in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the document on behalf of Thames Water:		Position acknowledged in Appendix C: Local Plan Statutory Consultee and through Infrastructure Plan position statements.
		Issue J: Water and Wastewater Infrastructure Thames Water support the recognition that wastewater infrastructure is an 'Outstanding Issue' and the action that " <i>Any further development delivery beyond that already planned will require phasing in line with upgrades to the Crawley Wastewater Treatment Works.</i> "		Support noted.
		Thames Water agree that there has been co-operation regarding wastewater issues in relation to the existing Core Strategy/Local Plan as set out in the previous Position Statement with Thames Water.		Agreement noted.
		As set out in May 2013 in relation to the Position Statement, the Upgrade of Crawley Wastewater		Noted.

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		Treatment Works STW had recently been completed to accommodate future growth demands up until at least 2021 (as outlined in the adopted Core Strategies of the relevant local authorities).		
		Thames Water support continued co-operation regarding the planning for wastewater treatment infrastructure beyond that already planned and consider that the Water Cycle Study should be updated as led by the Local Authority/Environment Agency.		Support noted.
		A key issue would be if the Environment Agency (EA) were to amend the Crawley Wastewater Treatment Works discharge consent and this will need to be raised with the EA in relation to the review of the Water Cycle Study.		Noted.
		In relation to ensuring that the necessary wastewater treatment infrastructure is provided in time to service new development, Thames Water have requested amendments to Policy IN1: Infrastructure as per the representations submitted in November 2012.		Noted
		Thames Water would be happy to meet to discuss the wastewater infrastructure requirements of future development in association with the new Local Plan.		Noted
Tandridge District Council	14/1/14	...I have no comments to make... <i>informal officer-level discursive comments included, raising some concerns regarding the structures in place and their influence over plan preparation across the Gatwick Diamond, and recommending maximising 'the effectiveness of the preparation of the Plan'.</i>		
West Sussex County Council	14/1/14	Thank you for your consultation upon the Borough Council's draft Duty to Cooperate Statement. Our officer comments are set out below:		
		Summary <u>Key Transport Routes</u>		

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		It would be helpful to make more explicit the role of the two county councils as the Local Highway Authority. The improvements being made by the Highways Agency and Network Rail are on the strategic network. The Thameslink project (due to finish in 2018) should be referenced as Three Bridges will be the operations centres with new signalling centre and maintenance facilities.	✓	
		<u>Flooding and Flood Risk</u> General: There is no reference to working together at joint Flood Risk Management meetings or Local Flood Risk Management Strategy.	✓	
		1 st paragraph – 2 nd sentence: Amend wording as follows (changes shown in red font): “Measures to manage and understand of fluvial flood risk on a strategic level are supported by expertise from the Environment Agency, whilst the management of surface water flooding has been developed is supervised by the County Council. Consenting and enforcement of changes to smaller watercourses has been delegated down to the district and borough level within West Sussex.	✓	
		3. Framework for Cooperation Para 3.1: In the second row of the table dealing with West Sussex the generic reference to “...very well established West Sussex county wide groupings...” is noted. Suggest mentioning the West Sussex Strategic Flood Risk Management Board and/or West Sussex Flood Risk Management Group if sufficiently relevant to the Local Plan.	✓ ✓	
		<u>Documents Establishing Agreed Outcomes</u> Para 3.8: There is no mention of the Local Flood Risk Management Strategy 2013-2018 in the list of key documents. Also under the final bullet point (Gatwick	✓	

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		Airport Memorandum of Understanding) there is a reference to West Sussex District Council - should this read West Sussex County Council?	✓	
		Issue C: Economic Growth <u>Nature of Cooperation</u> In paragraph C.10 it is suggested that a date (2013) is given for the West Sussex Delivery and Investment Framework.	✓	
		Issue E: Key Transport Routes At present there is little mention of the extent of Crawley Borough Council/West Sussex County Council joint working on the Local Plan Transport Study, the County Council's involvement being only briefly mentioned. Whilst the Borough Council has both commissioned the consultants and funded the study there have been significant County Council inputs throughout the study including contributions in kind. It is suggested that more information about the study be set out in this section including outcomes after the consultants' work is complete.	✓	
		Issue F: Flooding and Flood Risk There is a lack of references to the West Sussex Local Flood Risk Management Strategy. This sets out the current levels of risk and how the risk management authorities (including Crawley Borough) will work together over the next five years to achieve the following objectives: <ul style="list-style-type: none">• Understand the areas that flood• Manage the flood risk in West Sussex• Enable people, communities, business and public bodies to work together more effectively• Put communities at the heart of what we do and help West Sussex residents during flood events, and	✓	
			✓	

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		recover as quickly as possible after incidents Amongst the duties mentioned in the strategy that are common to all risk management authorities are the duty to cooperate on flood risk and the duty to contribute towards the achievement of sustainable development. The strategy is currently going through approval by all the district and borough councils and will then get adopted by WSCC. This will happen in April/March 2014.	✓	
		It would also be appropriate to mention West Sussex and Surrey County Councils' roles as lead local flood authority for their respective areas.	✓	
		<u>Nature of Cooperation</u> Suggest mentioning the West Sussex Strategic Flood Risk Management Board and/or West Sussex Flood Risk Management Group if sufficiently relevant to the Local Plan.	✓	
		Appendix A: Summary of Joint Evidence Base Documents It is suggested that the Local Plan Transport Study be included in this summary.	✓	
		Appendix B: List of Prescribed Bodies and Statutory Consultees Gatwick Diamond Authorities diagram should make clear that membership of this group includes Surrey County Council and West Sussex County Council.	✓	Gatwick Diamond Local Authorities map has been amended to include reference to the County Council areas.
		Appendix C: Strategic Joint Working Mechanisms It is suggested that references to the following are included: 1. Flood Risk Management meetings and Local Strategy 2. Transport Studies	✓ ✓	
		Subject to the comments above and given that the Local Plan Transport Study is not yet complete, I am able to confirm WSCC support for the Statement in relation to its		Support Noted.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		content, the outcomes of joint working set out within the Local Plan strategic approach and the mechanisms for further consideration of the outstanding issues.		
	23/1/14	<p>Further to your questions about the Flood Risk Management meetings and Local Strategy I hope that the following information provides what you need: CBC representation:</p> <ul style="list-style-type: none"> • At West Sussex Flood Risk Management Operational Group: John Braidley (Drainage Engineer) and Ray Hook (Built Environment Manager) • At West Sussex Flood Risk Management Board: Peter Allen (Head of Property) <p>Past Meetings*:</p> <ul style="list-style-type: none"> • West Sussex Flood Risk Management Operational Group: 26/11/2009, 20/01/2010, 30/09/2010, 20/12/2010, 13/04/2011, 13/12/2011, 11/02/2013 , 11/06/2013, 10/09/2013, 20/12/2013 with next meeting due on 11/03/2014 • West Sussex Flood Risk Management Board: 16/12/2010, 20/04/2011, 30/09/2011, 16/01/2013, 26/03/2013, 08/07/2013, 16/12/2013 with next meeting due on 31/03/2014 <p>*Notes of these meetings have normally been circulated to attendees but not made publicly available.</p> <p>Outcomes:</p> <ul style="list-style-type: none"> • Joint flood risk management work programme (will be worked on in 2014) • Local Flood Risk Management Strategy(2013/2014) • Delegated powers to Districts and Borough for Ordinary Watercourse Consenting (2012) – with legal agreement • West Sussex Interim Position Statement on SuDs 	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		<p>(2011)</p> <ul style="list-style-type: none"> • Preliminary Flood Risk Assessment (2011) <p>Regarding the Transport Studies I have made a couple of amendments (in red) to the list of meetings in your email. The meeting on 29/05/2013 that you mentioned was held to discuss infrastructure planning particularly in relation to the future needs of WSCC services in the context of the draft Crawley Local Plan.</p> <p>Rachel and James attended and I also introduced the emerging WSCC schedule of identified schemes known as the Strategic Infrastructure Package. This is the only other meeting I am aware of that it might be appropriate to mention in your Statement which I believe includes all of the relevant groupings through which CBC/WSCC joint working on infrastructure has been taking place.</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
Arun District Council	16/1/14	<p>Thank you for including Arun District within the group of authorities that you provided the original Draft Duty to Co-operate Statement.</p> <p>No significant issues have been raised but please find attached some note and queries that you may find helpful.</p>		
		<p>Thank you for the chance to comment on the Crawley Duty to Co-operate Statement. The following points are made in the order in which they appear in the document and referred to by the pages.</p>		
		<p>Page 13: The second sentence under the bullet point called Considering County issues on page 13 should be amended to 'These have now been extended to include the Coastal authorities including Brighton and Hove...' as the current wording is unclear.</p>	✓	
		<p>Page 20: the end of paragraph 3.8 mentions documents that are agreed or in preparation. Recent advice from the Planning Inspectorate and especially mindful of the Mid</p>	✓	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		Sussex decision, it seems that only agreed documents and actions can be taken into account when the Duty to Co-operate is being considered. As such the following minor amendment is recommended 'the key documents currently agreed or in preparation setting out...'		
		Page 24: correction or amendment needed to A15. In this section, though the point is understood, the third sentence does not make sense as currently written. It is suggested to one of the following: '...level set out in the South East Plan or the higher need figure met within its boundaries within the constrained borough became..' 'level set out in the South East Plan or the higher need figure met within its boundaries within the constrained borough became...'	✓	Sentence re-worded as a combination of the two suggestions: '...level set out in the South East Plan or the higher need figure met within its constrained boundaries within the constrained borough became...'
		Page 25: is the Authorities Involved section intended to be a summary of those mentioned throughout section A as a whole or linked to A17?		Throughout Section A – this format is used in each section of the document.
		Page 29: minor correction needed. In the first sentence the following minor correction is needed: '...in the Coastal Sussex Sussex Coast housing..'	✓	
		In A32: the 2nd paragraph suggests that the intention of the meetings was the production of the documents agreed, however these were not always to discuss the duty but it was raised as an issue. The use of the word 'series' suggests that all meetings were organised with one aim from the beginning, whereas it is more accurate to say that there were a number of meetings.	✓	
		Page 73: Coastal & Northern West Sussex Authorities – Arun is listed within the Membership of this group and the outcome includes a statement of common ground signed by the Portfolio Holder. We are not certain whether this is		This was in reference to the document agreed in relation to the Brighton examination. It is considered to be an outcome of the previous officer-level meeting which allowed for

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		the Statement of Common Ground that was formed in relation to the Brighton examination or if this is another. As such we are uncertain as to whether this is a definite outcome from this group.		this agreement to progress. The reference to this action from meeting minutes are now in the outcomes for clarification.
Chichester District Council	17/1/14	This is a very comprehensive statement, and Chichester concurs with all of the comments made by Adur and Worthing Councils, so I will not repeat them here. In addition to these, please find the following:		
		Page 8 Flooding and Flood Risk – first paragraph, second sentence: remove word 'of' after 'understand'.	✓	
		Page 28: it would be useful for Reigate and Banstead to be shown in table 1 as they are helping to pick up some of the northern West Sussex Authorities shortfall.		This table was extracted from the Position Statement and through the RBBC Core Strategy examination it has not been possible to quantify the actual amount of Crawley's unmet need will be met within Reigate and Banstead. However, the Unmet Needs paper now provides some degree of understanding of where housing developments in close proximity to Crawley are progressing.
		Page 44: F8 First sentence – remove word 'behalf'.	✓	
	Page 46. F.11 First sentence: the word 'catchment' is spelt incorrectly.	✓		
	20/1/14	Page 29: It is suggested that future discussions are held to look at how unmet housing needs will be provided for.		Noted and future discussions are welcomed and encouraged. Crawley Borough Council is already taking an active role in these, for example meeting jointly with Adur, Worthing and Horsham (22/1/14).
Brighton and Hove City Council	17/1/14	...have checked the references to BHCC and there is nothing that raises a concern.		Response noted and acknowledged.
Horsham District Council	12/2/14	The statement of Common Ground produced by Crawley Borough Council is commended by Horsham District Council as a comprehensive and helpful piece of work. These comments are made in a constructive way as a		Support noted.

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		party that is a strategic authority, to aid with the Duty to Cooperate process. Horsham District Council supports the document and its findings to date.		
		Page 7: For Transport Improvements is the western bypass on the list of future infrastructure?		This is the strategic overview – however, it has been picked up and included as reference as part of the Transport Infrastructure Issue section.
		Page 8: River Mole is in Horsham District, it starts by Rusper and that area is in the highest level of its catchment.		The waterways within Crawley are tributaries for the River Mole – they all feed in to the river in Horsham and therefore form part of the river catchment.
		Green Infrastructure: HDC can help with providing this.		Noted and welcomed.
		Context: Community patterns and relationship with Horsham – could we explain this?		Further discussion necessary to understand how best to address this suggestion.
		Para. 2.3: Existing joint working – great, support.		Support noted.
		Para. 2.4: Basin area should say catchment.	✓	
		Para. 2.5: Strategic issues – yes, we agree with this.		Support noted.
		Para. 2.6: Say senior officer or CEO to show that support is up to the highest level. As per the wording in our NWS Position Statement. Check throughout document. A9 as well.	✓	
		Para. 2.7: what is the GD LSS; how did it come about? Perhaps use GD paper or have in an annex?		The Gatwick Diamond LSS is a clear output of historic joint working prior to the formal requirement for meeting the Duty to Cooperate.
		This section talks a lot about meetings but outcomes are what the Inspector is looking for.		Mid Sussex Inspector's letter made clear that it was critical to ensure the framework for Cooperation was clearly articulated as well as showing how this has led to outcomes. Particularly where the outcomes may not be the end of the story (such as meeting housing needs). This addresses some of the requirements for meeting the legal duty. The remainder of the document deals with the

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
				issues and picks up the detail of outcomes in addition to the meetings.
		Para. 3.5: Is this DtC if it is 121 or just 2 authorities?		The Duty applies to all prescribed bodies in relation to development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council. Sometimes the one-to-one meetings are a necessary way of ensuring delivering effective outcomes which will have a wider strategic significance.
		Para. 3.7: Did CBC attend or engage in this?	✓	
		Para. 3.8: The GD MOU is part of the LSS, isn't it?		These are two separate, linked documents. The MOU is the only one of the two which is signed by Tandridge District Council.
		Gatwick Airport is part of the S106.	✓	
		Issue A: Mention more clearly and up front about West of Bewbush as the only way for Crawley to expand.	✓	Reference is made to the current urban extensions to Crawley – both Kilnwood Vale and Forge Wood.
		A15: typo – development	✓	
		A15: adjacent or beyond Crawley	✓	
		A18 – 20: Set out that Crawley has too much growth to accommodate in its own boundary. Therefore, there is a need to look elsewhere, outwards or something else, but no stone has been left unturned.		This is explained in paragraph A.21.
		A22: West of Ifield – this section needs expansion to explain how this site is being considered by both LPAs.	✓	
		A25: RBBC get their report in January.		Acknowledged.
		A28: HDC...		
		A30: This is an area for, initially, understanding and the sharing of information. The way forward and outcome should be about shared understanding and agreement.	✓	But it is still contended that the aim should be to seek a solution not just understanding.
		A33: What does this mean?	✓	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		C5: HDC and BCC counting, ok.		Acknowledged.
		C6: Acknowledgement of the interdependency is supported.		Support noted.
		C7: HDC pick up the employment shortfall? Clarify.		This is tied to the evidence as set out in the joint northern West Sussex Economic Growth Assessment.
		C9: The retail issue is rather lost in this employment section. Perhaps consider a separate town centres section where retailing is considered as well as the role of town centres.	✓	
		C10: What infrastructure is about.		Further discussion necessary to understand how best to address this query.
		C12: Further work is needed beyond the NW Sussex area to understand the employment patterns. Ongoing work should take place to monitor the working patterns in NWS.		Currently awaiting the final release of Census 2011 Travel to Work data.
		C14: Is it the best town to compete with Guildford, Bluewater? What is the offer and what do other towns such as Horsham contribute and do to help?	✓	Text amended by some of it reflects the position agreed by the Gatwick Diamond LSS and is a direct quotation from the document.
		Issues and outcomes are a bit confused about economy and retail. As per C9 above.	✓	
		Airport: Explain the dependency on the airport clearer.		This is picked up in detailed evidence base documents such as the Employment Land Review 2009/10 and the Economic Growth Assessment 2014.
		HDC agree with the single runway, two terminal – Review of all plans as a result of the second runway. Joint work no doubt.		Support noted.
		Kilnwood Vale Station?		This is referred to in E.13
		F5: Horsham link to flood attenuation measures and JAAP, please acknowledge.		Further discussion necessary to understand how best to address this query.
		URMSG also includes Gatwick Airport and Water Utilities.	✓	
		F8: GD is a water stress area, explain why update was		Further discussion necessary to understand

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Prescribed Body	Date of comment	Comment	Amendment Made?	CBC response
		not necessary for HDC.		how best to address this query.
		The water study and water supply is repeated in two sections. Suggest it would be better in the infrastructure section, not flooding.	✓	
		F10: What sites are 2&3? Name these.	✓	
		Second runway and flood risk?	✓	
		West of Ifield will allow for flood alleviation.		Further discussion necessary to understand how best to address this query.
		Extensions to Crawley: where, how?		Further discussion necessary to understand how best to address this query.
		Climate change: what about issue of waste to energy proposals.	✓	
		Joint Initiative of LSS.		Further discussion necessary to understand how best to address this query.
		G10: Needs expansion as this is not clear.		This is currently still being worked upon jointly with colleagues in Horsham District Council.
		Issue H Broadband: totally support but why is it particularly important to Crawley that it warrants mention here? e.g. HDC it will benefit the rural areas.		Manor Royal experienced poor broadband coverage and it and many of the employment areas have benefited from improvements to the broadband network – particularly in terms of speed and capacity.
		H1: Relationship to HDC is unclear.		Further discussion necessary to understand how best to address this query.
		Green Infrastructure: This is a helpful section to show the relationship and collaboration between HDC and CBC. GD mapping exercise could be mentioned.		Support noted.
		I18: Numbering has gone wrong.	✓	
		AONB and location in HDC could be explained.		Further discussion necessary to understand how best to address this query.
		I15: Can we expand upon the coalescence issue? A264 gap.		Further discussion necessary to understand how best to address this query.
		Water repeated again.	✓	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

**APPENDIX F: CRAWLEY BOROUGH COUNCIL DUTY TO COOPERATE
REQUEST (AUGUST 2014)**

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Strategic Housing & Planning Services

Contact: Elizabeth Brigden Date: 20 August 2014
Direct Line: 01293 438624 Email: elizabeth.brigden@crawley.gov.uk



Director: David Covill
Development & Resources Directorate

Dear Councillor,

Crawley Borough Local Plan 2015 – 2030: Duty to Cooperate

As you may be aware, the Crawley Borough Local Plan 2015 – 2030 was approved for publication and submission at the Full Council meeting held on 23 July 2014. The publication consultation will take place for a 6-week period commencing **Monday 1 September until Monday 13 October 2014**. The Local Plan has been prepared in the context of substantial, positive, ongoing cross-boundary working carried out over the various functional strategic areas in which Crawley forms part and I acknowledge and thank you for this.

The purpose of this letter is to draw your attention to the critical outcomes of the Crawley Local Plan in relation to meeting objectively assessed development needs, to invite your comments on the information provided and to formally request confirmation of the role in your authority to be able to play in assisting my council in addressing identified unmet development needs under the Duty to Cooperate provisions.

I have extended the range of this letter to those authorities considered to have some degree of strategic planning relationship with Crawley even where administrative boundaries are not shared.

More detail of Crawley Borough Council's understanding of all the joint working is provided in the Local Plan Duty to Cooperate Statement (July 2014). I have enclosed an internal pre-consultation draft of this document with this letter for your information and would welcome comments on this, preferably in advance of our formal publication consultation (i.e. by 28 August 2014). However, I recognise this is a tight deadline and we are in the holiday period. Therefore, if this is not possible, then comments as part of the consultation period would also be valued.

In light of Crawley's tight administrative boundaries, Gatwick Airport 'safeguarded' land for a potential second runway and physical constraints such as aircraft noise contours, flooding, nature conservation constraints and few infill opportunities due to the age and planned nature of the new town, there is very limited land within the borough for accommodating further development.

The total **unmet need**, assessed against the objectively assessed needs for both housing and employment, arising from within Crawley over the Plan period (2015 – 2030) is:

- Housing: 3,130 dwellings
- Employment: 35ha of land for B Use Classes

The following sections of this letter set out a summary of Crawley's position in relation to its housing and employment needs. Comments would be welcomed in relation to whether your authority is in agreement with the conclusions reached.

Housing

Ongoing work undertaken by Crawley Borough Council seeks to maximise the extent to which needs arising from Crawley can be accommodated within the borough's boundaries. This has included

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

undertaking a substantial Urban Capacity Study revisiting every potential site within each of the town's neighbourhoods; removing all policy constraints and reassessing these in light of the competing need to provide land for development; undertaking additional public consultation, technical and viability studies on the potential of additional sites, and reassessing the potential for windfalls in light of the new Planning Practice Guidance. This work has ensured the total supply of land for housing within the borough has been increased by a capacity of 1,095 net dwellings: from 3,800 dwellings in the preferred strategy Crawley Local Plan (October 2012) to 4,895 dwellings in the submission Crawley Local Plan (September 2014).

Crawley's submission Local Plan confirms that the supply-led capacity figure over the 15 year Plan period to 2030 for Crawley is a minimum of 4,895 net dwellings. This is against an objectively assessed housing need equal to 535 dwellings per annum; totalling 8,025 net dwellings over the same Plan period. This leaves a total unmet needs figure of 3,130 to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

It is continued to be expected that the majority of this unmet housing need arising from Crawley will be accommodated within the wider northern West Sussex Housing Market Area. Agreement has already been formally reached with Reigate and Banstead Borough Council through an acknowledgement confirmed within the Reigate and Banstead Core Strategy (2013) that some of the housing anticipated to meet in-migration into the borough will help address unmet needs arising from Crawley. The northern West Sussex Authorities' Position Statement (2012) also indicated that some of Crawley's unmet needs will be accommodated within the wider housing market area, through housing delivery levels proposed by Horsham and Mid Sussex District Councils within draft Local Plans. The emerging update to the Position Statement continues to indicate that this is the case. Paragraph 6.6 set out in the draft submission Horsham District Planning Framework confirms that the housing level set out in the Plan provides a degree of accommodation for housing need arising from within Crawley which it recognises is unable to be met within our administrative boundaries.

Economic

In addition to the unmet housing needs, joint working undertaken across northern West Sussex through the joint commissioning of the recent Economic Growth Assessment (EGA), 2014, has highlighted significant anticipated levels of economic growth in the economic sub-region. Much of the identified growth is associated with the economic strength of Crawley and Gatwick.

Due to the land supply constraints faced by the borough, and particularly the continued uncertainty in relation to a potential second runway at Gatwick Airport, Crawley is currently anticipating a shortfall of 35ha of employment land for B Use Classes, against an objectively assessed identified need of 77ha, as emerged from the EGA. In accordance with the Local Enterprise Partnership's Strategic Economic Plan (2014), this unmet need should first be directed to the Heart of Gatwick (Crawley and North Horsham).

The submission Crawley Local Plan confirms Crawley's commitment to working with neighbouring authorities to address this unmet need in the most appropriate manner and locations, and sets out the hierarchy suggested by the Northern West Sussex Economic Growth Assessment, which is complementary to the approach promoted by the Coast to Capital Local Enterprise Partnership's Strategic Economic Plan. Through positive joint working under Duty to Cooperate, and utilising the sequential approach established through Crawley's submission Local Plan (in the first instance this is land within Crawley; if this is not possible then land 'at Crawley'; and then, finally, to land near Crawley/Gatwick), Crawley Borough Council is committed to working alongside its neighbouring authorities to scope locations for accommodating unmet economic needs.

I would welcome a written response from your local authority by 28 August, to help formalise the understanding between us with regard to whether your authority is able to assist Crawley in meeting its unmet needs and whether you consider the Crawley Local Plan Duty to Cooperate Statement accurately describes the progress to date.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Similarly, please let me know if your authority considers there are any other strategic issues not sufficiently covered or ways in which you believe Crawley may be able to assist you in your strategic planning needs.

Please contact me or my officer, Elizabeth Brigden, should you have any questions or require further clarification with any of the content included above.

I look forward to continuing to work with you in the future to seek positive solutions to these challenging strategic issues.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter Smith', with a horizontal line underneath.

Cllr. Peter Smith
Cabinet Member for Planning and Economic Development

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

APPENDIX G: LOCAL AUTHORITY RESPONSES TO CBC DUTY TO COOPERATE REQUEST

Local Authority	Date	Response	Officer or Member Level
Arun District Council	28 August 2014	<p>We understand from the paper presented that Crawley does not have space for the following needs:</p> <ul style="list-style-type: none"> · Housing: 3,130 dwellings · Employment: 35ha of land for B Use Classes <p>Arun's Officer Response:</p> <p>Housing. Your strategy (statement of common ground) has been for Crawley to work with Reigate & Banstead, Horsham and Mid Sussex to assist with its unmet needs. At present we consider Horsham and Mid Sussex are intending to provide for some of the unmet needs for Crawley whilst Reigate and Banstead's recent Examination Report makes it clear that R&B will be accommodating some of Crawley's needs.</p> <p>We understand that CBC is working closely with its adjacent authorities who have agreed to seek to accommodate CBC's unmet needs. At present, it is not known how much of these needs will be able to be met by these authorities. Arun can not therefore determine if there would be a legitimate call for sites in Arun for CBC.</p> <p>Within Arun's own housing market area our adjacent local planning authority of Chichester has determined that it can not meet its objectively assessed needs whilst our other adjacent local planning authority of Worthing considers it is very unlikely to be able to accommodate its own needs. Arun's objectively assessed housing range (incorporating the parts of the district within the South Downs local planning authority) is 550-650 homes per annum and the maximum deliverable has been established as 700 units per annum. Arun's submission target for the district needs is 580 units per annum. It is unknown what range, if any, of unmet needs may be requested from Chichester and Worthing or beyond. Arun's publication Local Plan makes it clear that active and ongoing evidence gathering and strategy development on the larger than local issues – including housing needs will continue to be considered through the framework of Coastal West Sussex and Greater Brighton Strategic Planning Board.</p> <p>Employment: We support CBC's sequential approach to employment land. This approach means that jobs will be located as close as possible to the centre of Crawley. For this reason Arun does not consider it to be appropriate to seek to accommodate the employment growth needs of Crawley.</p>	Officer-interim

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Local Authority	Date	Response	Officer or Member Level
Mid Sussex District Council	29 August 2014	<p>Thank you for your letter of 20th August about your Council's future housing and employment needs which, for the reasons you outline, you will not be able to provide for in full in the Borough Local Plan.</p> <p>The Northern West Sussex Authorities' Position Statement, the update of which I signed earlier this month, acknowledges that Crawley and Mid Sussex, together with Horsham District Council, have a long history of working together on issues of mutual importance. Our three authorities share planning and administrative boundaries, and there is a particularly strong history of joint working and collaboration on planning policy matters.</p> <p>Our authorities lie within the same Housing Market Area and the recently released 2011 Census travel to work data confirms that there continue to be strong employment linkages between Crawley and Mid Sussex.</p> <p>Your officers are aware that we are currently undertaking an assessment of the sustainability of meeting or contributing to our immediate neighbours' unmet development needs. In parallel with this, we are assessing our own capacity to accommodate new development and we expect that both workstreams will be substantially complete by the end of September. Until this time, we shall not be in a position to advise on the extent to which Mid Sussex may be able to assist your Council in meeting its unmet housing and employment needs.</p> <p>We are happy to endorse the conclusions on housing and economic development issues set out in your letter. We are also happy to support your Local Plan and would be pleased to continue to cooperate proactively and in partnership with your Council as we prepare our own revised District Plan.</p>	Member (Councillor Norman Webster, Cabinet Member for Planning)
Guildford Borough Council	29 August 2014	<p>Guildford Borough Council is currently in the process of finalising a West Surrey SHMA with Woking and Waverley borough councils. Whilst this area has been identified as our core housing market area, we acknowledge that we share linkages with other nearby housing markets areas. In spite of this the linkages we share with Crawley is limited. We are currently undertaking a 12 week consultation on our draft Local Plan. This proposes a housing target of 652 homes per year which is the lower end of a range identified in the draft Guildford SHMA. Given that the NPPF requires that housing need is assessed and met over a housing market area we will need to continue working, in the first instance at least, with Waverley and Woking as the other authorities in our HMA. It is likely that there will be unmet need arising from our own area.</p> <p>We are currently finalising our Employment Land Assessment. This will look at our employment</p>	Officer

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Local Authority	Date	Response	Officer or Member Level
		<p>needs and sites within the context of our functional economic area which also covers Woking and Waverley borough councils.</p> <p>Once complete both these studies will help inform our emerging new Local Plan and future duty to cooperate discussions. At this time we do not feel we have the capacity or the justification to accommodate some of your unmet housing or employment needs within our borough.</p>	
Tandridge District Council	2 September 2014	<p>I refer to the letter from Councillor Peter Smith and the enclosed Duty to Cooperate Statement.</p> <p>I consider that the Statement is an accurate reflection of the strategic issues with cross boundary implications and as far as I can tell represents the progress to date accurately. I welcome the inclusion of the information concerning our recent contact regarding the possibility of joint working on a SHMA. I am not aware of any other issues that should be included.</p> <p>As far as helping to meet future development needs arising in Crawley is concerned I note the 'sequential approach' however it should be noted that as far as Tandridge is concerned the areas nearest to Crawley are Green Belt and Tandridge would be unable to agree to take any unmet needs within this Green Belt area. The only settlement in the vicinity, that is not in the Green Belt, is Smallfield, this is defined as Larger Rural Settlement in the Core Strategy, and the Core Strategy indicates that Smallfield will not be expanded, although development to meet the needs of the community through infilling and on sites allocated for affordable housing will be acceptable. Therefore under the present spatial strategy I do not consider Smallfield can be considered as a location to help meet Crawley's unmet needs.</p> <p>Given the 'very small interrelationship between Crawley and Tandridge in terms of housing migration – which appeared as a zero net level in the period 2006-11'²³ and given the geographical separation, it does not seem appropriate for the District's northern built up areas of Oxted, Caterham, Warlingham/Whyteleafe to be considered as potential locations to take development to assist with meeting any unmet need from Crawley. These areas will be under considerable pressure to absorb outmigration from London generally and the London Borough of Croydon more specifically.</p> <p>As Tandridge is 94% Green Belt with considerable areas of AONB there will be significant challenges in meeting the likely level of housing need required within Tandridge itself. Given these constraints I do not consider that Tandridge will be able to help in meeting any unmet need from</p>	Officer (Paul Newdick, Head of Planning Policy)

²³ Paragraph A.38 of the Crawley Borough Local Plan - Duty to Cooperate Statement.

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p>Crawley Borough.</p> <p>Please note that we have not yet considered the Crawley 2030 – statutory submission consultation document. If we have any comments on this we will let you have these before the closing date.</p>	
Adur and Worthing	5 September 2014	<p>Thank you for your letter of the 20th August 2014 inviting comments on the critical outcomes of the Crawley Local Plan in relation to meeting objectively assessed development needs and your formal request for the confirmation of whether or not Adur and Worthing can assist in addressing Crawley’s unmet development needs under the Duty to Co-operate provisions. I provide a response on this further below.</p> <p>You have also requested comments on your Duty to Co-operate Statement ideally before the 28 August 2014. Whilst we are unable to provide comments on the Statement by this date, we will aim to comment as part of the Local Plan Publication consultation. However, we note that the majority of amendments we requested be made to the previous draft Statement have been made and we thank you for that.</p> <p>Housing Provision needs</p> <p>It is understood that Crawley’s unmet housing need is for 3,130 dwellings. However, the work that Crawley has undertaken to assess the potential of the borough to accommodate new housing appears comprehensive and is appreciated. It is also understood that there is very limited land within the borough to accommodate further development, in part due to the Gatwick Airport ‘safeguarded’ land for a potential second runway. It is noted in your letter that it is expected that the majority of the unmet housing need will be accommodated within the wider northern West Sussex Housing Market Area (Horsham and Mid Sussex) as well as in Reigate and Banstead. However, it is not known how much of these needs will be able to be met by these authorities. You ask the question as to whether Adur and Worthing is able to assist Crawley in meeting unmet needs and the response is detailed below:</p> <p>Adur</p> <p>With regard to Adur, it is proposed (subject to Member approval) to publish a pre-submission draft of the Local Plan for consultation in October and November of this year.</p> <p>The Local Plan provides for a minimum total of between 3047 and 3197 homes over the plan period 2011 to 2031 (between 152 and 160 dwellings per annum). The provision in the Local Plan does not meet Adur’s objectively assessed needs. The Coastal West Sussex Housing Needs study of April 2014 indicates that the objectively assessed housing need for Adur between 2011 and</p>	<p>Member (Councillor Pat Beresford, Cabinet Member for Regeneration – Adur District Council and Councillor Bryan Turner, Cabinet Member for Regeneration – Worthing District Council)</p>

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p>2031 is between 3,600 and 4,800 (180 to 240 homes per annum). The upper figure in the range is to address affordable housing needs and to ensure a sufficient workforce for the local economy.</p> <p>The capacity constraints to providing new housing development in Adur are highlighted in the Coastal West Sussex Housing study – Duty to Co-operate study of 2013. This study notes the location of the district sandwiched between the sea and the South Downs National Park and it highlights the flood risk and landscape constraints. There are also congestion problems on the A27 and A259 which limits the amount of development even with mitigation measures in place. The wider constraints of the coast are also highlighted in the Coastal West Sussex Local Strategic Statement. Notwithstanding these constraints Adur is ‘leaving no stone unturned’ in trying to meet objectively assessed needs in the Local Plan. As stated in the Coastal West Sussex Housing study – Duty to Co-operate study of 2013, ‘ In addition to capacity within the existing urban area, considerable work has been undertaken to consider development potential at Shoreham Harbour. The Council is already considering the potential for significant development outside of the built-up area boundaries within the Lancing/Sompting-Worthing and Lancing-Shoreham Green Gaps through the preparation of its new Local Plan. The potential for development within these areas is affected by both tidal and fluvial flooding, infrastructure and landscape capacity.’ The study concludes that ‘ the Council is evidently making serious attempts to meet needs.’ In addition to the strategic allocations in the draft Adur Local Plan, the Council is undertaking further work to help meet housing needs which includes a current review of Strategic Housing Land Availability (SHLAA) sites, a recently completed Employment Land Review and allowing for the use of housing windfall sites. Shoreham Harbour represents the main brownfield site opportunity in Adur to secure 1,100 new dwellings which will be provided at a higher density than the strategic allocations on the edge of the urban areas.</p> <p>Because Adur is unable to meet its own objectively assessed needs, it is unable to assist Crawley in meeting its housing provision needs. Adur is currently working with other local authorities within West Sussex which are within or about the housing market area to address housing needs under the duty to co-operate. Active and ongoing evidence gathering and strategy development on the larger than local issues – including housing needs - will continue to be considered through the framework of the Coastal West Sussex and Greater Brighton Strategic Planning Board; the Greater Brighton City Deal as well as through the Coast to Capital Local Economic Partnership.</p> <p>Worthing</p> <p>With regard to Worthing, the adopted Core Strategy (2011) seeks to deliver a total of 4,000</p>	

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p> dwellings to 2026 (200 dwellings/year) which was the requirement set for the Borough within the South East Plan. This is a figure that takes into account the lack of opportunities for any more significant growth in and around Worthing and as such, the key focus of the local strategy is regeneration. There was never any suggestion that this level of development would meet all of Worthing's housing needs. Through the AMR the Council has been able to demonstrate that against the requirements of the Core Strategy the Borough has met (and often surpassed) the 200 dwelling a year requirement.</p> <p>It is recognised that the significant changes made to the planning system, in particular, how each authority must now assess its housing needs, means that a full review of the local policy position is now required. The Coastal West Sussex Housing Needs study of April 2014 indicates that objectively assessed needs for Worthing is between 500 and 600 dwellings per year and further work to provide more information on this has recently been commissioned. The outcomes of this work will help to inform the timetable for the full Plan review to be set out within a revised Local Development Scheme. This will be prepared for consideration by Members later this year.</p> <p>A full and positive review of the Worthing SHLAA is currently being undertaken and careful consideration will be given to the potential allocation of additional sites (including greenfield opportunities) to help meet development needs. Although the SHLAA review has yet to be finalised, it is clearly apparent that opportunities to deliver new housing are extremely limited. Even though the development potential of every opportunity in and around Worthing will be tested, there is still no realistic or sustainable prospect of ever being able to identify sufficient housing sites to completely meet objectively assessed housing need. Even if every realistic opportunity were to be developed the lack of available land and other constraints will mean that there would still be a significant shortfall.</p> <p>The Coastal West Sussex Housing study – Duty to Co-operate study of 2013 notes that Worthing is a relatively small local authority and that the urban area is sandwiched between the sea to the south and the South Downs National Park to the north. Most of the land outside of the built-up area to the north of the town falls within the South Downs National Park. Development potential is also affected by two river flood zones, and significant congestion on the A259 and the A27 which runs as a single carriageway road through much the Borough. The study concludes that whilst further work is needed, 'it is unlikely that delivery of more than 250 homes per annum over a sustained period can realistically be achieved in the Borough.'</p>	

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p>Because it is highly likely that Worthing will be unable to meet its own objectively assessed needs, it is also highly probable that it will be unable to assist Crawley in meeting its housing provision needs. As stated above in relation to Adur, Worthing Council is currently working with other local authorities within West Sussex which are within or abut the housing market area to address housing needs under the duty to co-operate. Strategic issues including housing needs will continue to be considered through the framework of the Coastal West Sussex and Greater Brighton Strategic Planning Board; the Greater Brighton City Deal as well as through the Coast to Capital Local Economic Partnership.</p> <p>Economic</p> <p>The significant anticipated levels of economic growth in the economic sub region, with much of this associated with Crawley and Gatwick is noted in your letter. You refer to the land supply constraints faced by the borough and the continued uncertainty in relation to the potential second runway at Gatwick Airport which means that there is a shortfall of 35 ha of employment land for B Use Classes against an objectively assessed need of 77 ha. As part of a sequential approach which seeks to locate as much of unmet need as close as possible to Crawley, you are scoping locations under the duty to co-operate working with neighbouring authorities and you ask the question as to whether Adur and Worthing can assist Crawley in meeting its needs. Such a sequential approach which seeks to locate jobs as close as possible to Crawley is supported by Adur and Worthing Councils as long as sufficient housing in the Gatwick Diamond area is provided to ensure workers can live close to their jobs and travel to work sustainably. A detailed response to your question is provided below:</p> <p>Adur</p> <p>The 2014 Employment Land Review for Adur indicates that the Adur Local Plan should make provision for between 15,000 and 20,000 sqm net floorspace for offices and research and development and between 35,000 and 40,000 for warehousing over the 2011 and 2031 period in addition to 18,750 sq m of employment floorspace to be relocated from Shoreham Harbour and provided elsewhere within Adur. However, due to capacity constraints (as referred to above in relation to housing - i.e. Adur's size and location, flood risk and landscape quality), the Local Plan can only allocate 41,000 sq m of floorspace for employment generating uses (not specifically B class uses). As such, co-operation with neighbouring local planning authorities is required under the duty to co-operate to seek to address and shortfall. Provision close to Adur is sought as part of</p>	

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p>a sustainable approach.</p> <p>As above for housing, because Adur is likely to be unable to meet its own employment floorspace needs, it is unable to assist Crawley in meeting its economic floorspace needs. However, both our authorities should benefit from the wider regeneration and growth aspirations within the LEP area and work together to ensure that mutual sustainable advantages are gained to benefit our communities. This would encompass jobs, skills and training. Adur is currently working with other local authorities within West Sussex to address employment and economic floorspace needs under the duty to co-operate. As with housing, active and ongoing evidence gathering and strategy development on the wider economic needs - will continue to be considered through the framework of the Coastal West Sussex and Greater Brighton Strategic Planning Board; the Greater Brighton City Deal as well as through the Coast to Capital Local Economic Partnership.</p> <p>Worthing</p> <p>The Worthing Core Strategy indicates a need to provide 780,000 sq ft of industrial and warehousing floorspace and 240,000 sq ft of office space up to 2026. Monitoring reveals that this amount is unlikely to be provided if current completion rates continue. Furthermore, changes made to planning policy at the national level have increased pressures on employment land in the borough from residential uses. In response to this, a recent Worthing Employment Land Review Update (Dec 2013) concluded that the Council's protectionist policy towards the retention of employment land is still valid and that there will continue to be a need to deliver additional employment land to help achieve economic growth.</p> <p>As part of the full review of the Council's Core Strategy a new Employment Land Review will be commissioned. This will provide more robust and up-to-date information on the type, scale and tenure of employment needs. This in turn will help to inform consideration of the location of this employment land within Worthing and within the context of the duty to co-operate. As above in relation to housing, there are significant constraints to meeting new development needs including the size and location of the Borough and a large part of the area falling within the South Downs National Park. Due to the scarcity of available sites to deliver new employment needs, co-operation with neighbouring local planning authorities will be required.</p> <p>Because it is highly likely that Worthing will be unable to meet its own employment floorspace needs, it is also highly probable that it will be unable to assist Crawley in meeting its economic needs. However, as referred to above, both our authorities should benefit from the wider</p>	

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p>regeneration and growth aspirations within the LEP area and work together to secure this. Worthing is currently working with other local authorities within West Sussex to address employment and economic floorspace needs under the duty to co-operate. Strategic issues including employment and economic needs will continue to be considered through the framework of the Coastal West Sussex and Greater Brighton Strategic Planning Board; the Greater Brighton City Deal as well as through the Coast to Capital Local Economic Partnership</p> <p>Summary Whilst the above concludes that both Adur and Worthing Council are unable to assist Crawley in meeting its unmet housing and economic needs given our own shortfalls, we wish you every success with your Local Plan. We have been engaging and co-operating with Crawley throughout all stages of our respective plans and we look forward to continuing this positive relationship.</p>	
Chichester District Council	5 September 2014	<p>It is understood from your letter that Crawley's draft Local Plan cannot meet its objectively assessed needs in full for housing and employment, and that the Plan identifies a shortfall of 3,130 dwellings and 35ha of employment land for B Use Classes.</p> <p>As a result of the shortfalls identified in the Crawley Local Plan, and to demonstrate that Crawley has complied with the duty to cooperate, you are firstly asking whether Chichester District Council is able to pick up any of Crawley's unmet needs, secondly, asking for our opinion regarding whether Crawley Duty to Cooperate Statement accurately describes the progress to date.</p> <p>To answer your first question, Chichester District Council is unable to meet all of its own objectively assessed housing needs in full, and is therefore unable to assist Crawley in meeting its housing shortfall. Given the employment needs link with the expansion of Gatwick Airport, Chichester would not be a sustainable location to meet employment needs as it does not have good direct road links to Crawley.</p> <p>In our opinion Crawley's Duty to Cooperate Statement does accurately describe the progress to date.</p>	Officer (Andrew Frost, Head of Planning Services)
Lewes District Council	8 September 2014	<p>Lewes District Council understands the difficulties that Crawley Borough Council faces in attempting to meet its development needs. I can advise that our current position in terms of assisting in meeting your unmet needs is as follows:</p> <p><u>Housing Needs</u> Lewes district's Objectively Assessed Need for housing has been agreed by LDC and SDNPA as being in the range of 9,200 – 10,400 in the period 2010 – 2030. The Joint Core Strategy, which is</p>	Member (Councillor Tom Jones, Cabinet Members for Strategy and Development)

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p>expected to be submitted to the Secretary of State for examination in mid-September, has a housing target of a minimum of 5,600 for the same period. This target leaves us with some 3,600 – 4,800 unmet housing needs over the plan period. The shortfall is due to the well documented environmental and infrastructure constraints of the district: including that 56% of the geographical area (including all of Lewes town) lies within the national park boundary; highways capacity constraints; and flood risk.</p> <p>As a result, this district is not in a position to assist in meeting Crawley Borough’s unmet housing needs.</p> <p><u>Employment Needs</u> Lewes district is able to meet its own employment land requirements to 2030. However, we do not have a surplus of employment land and our Employment and Economic Land Assessment highlights the need to safeguard our existing employment sites from encroachment by other uses, except where there is a demonstrated economic viability or environmental amenity reasons for not doing so. This safeguarding is required in order to maintain an adequate supply and choice of land for the plan period in order to encourage economic development and to avoid lack of supply being a barrier to economic development in the district.</p> <p>As a result, this district is not in a position to assist in meeting Crawley Borough’s unmet employment land needs. Notwithstanding this position, given the relative lack of proximity between Lewes district and Crawley, the different functional economic areas and the very limited commuting flows from the borough to this district, it is unlikely that Lewes district would be a spatially appropriate location for seeking to meet the borough’s employment land needs anyway.</p> <p><u>Duty to Cooperate Statement</u> We have no comments to make on your draft Duty to Cooperate Statement, which we agree is a comprehensive description of cooperative working to date, insofar as we have been involved with the Crawley Borough Local Plan 2015-2030.</p> <p>Similarly, we will shortly be circulating our draft Duty to Cooperate Statement and associated Statement of Common Ground in support of the Lewes District Joint Core Strategy 2010-2030. We very much hope that you will be able to agree to its content insofar as it relates to cooperative working with you.</p>	

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p><u>Future Cooperation</u> Lewes District Council is committed to working collaboratively in seeking to find solutions to strategic planning issues, with particular focus in our case on meeting housing needs. In this pursuit we are actively engaged with our partner authorities in the Sussex Coast Housing Market Area, together with other authorities in East Sussex and yourselves in the North West Sussex group of authorities.</p> <p>Thank you for your assurances of your intent to continue to work together in the future to seek positive solutions to the challenging strategic planning issues faced in this sub-region. Similarly we look forward to ongoing collaboration with you in this quest.</p>	
Reigate and Banstead Borough Council	6 October 2014	<p>I note the details of Crawley Borough's development needs set out in your letter and the challenges faced by your authority in planning to meet these needs. You will already be aware that Reigate & Banstead Borough also faces considerable constraints which limit our own ability to accommodate growth.</p> <p><u>Housing</u> Through the Reigate & Banstead Core Strategy examination process it was recognised that, whilst the borough was able to provide sufficient housing to meet the full need arising from the local population, it was not able to fully meet its objectively assessed housing needs. Our housing figure does, however allow for some continuing in-migration from other local authorities including those within East Surrey and North West Sussex (a total of around 90 – 130 dwellings per year).</p> <p>Our Core Strategy does not make specific (quantified) allowances for in-migration from individual boroughs, given the complexities of the housing market area for Reigate & Banstead and the inability to control where those who purchase market housing in the borough originate from. Whilst we note the figure of 50 dwellings per year identified in your Local Plan supporting documentation (Topic Paper 5), this is not derived from our own policy or evidence base.</p> <p><u>Employment</u> The Reigate & Banstead Core Strategy makes provision for employment land to meet identified local employment needs. No provision is currently made to meet either the local needs of neighbouring authorities or wider strategic needs. We have recently commissioned work to scope out the possibility of additional employment development in the borough to meet 'strategic needs' (defined as growth that falls outside of local demand and needs). However we do not yet have the conclusions of this work, nor have we made any policy provisions for such development.</p>	Member (Councillor Tony Schofield, Executive Member for Planning and Development)

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p><u>Other strategic needs</u> Your letter asks whether there are any other strategic issues that are not sufficiently covered or ways in which Crawley may be able to assist in our strategic planning needs.</p> <p>Specifically in relation to Gypsy and Traveller accommodation, whilst we are committed to meeting our identified needs as far as possible, we have not yet been able to conclude whether sites can be allocated to meet the full need identified within our Traveller Accommodation Assessment without compromising the purposes or integrity of the Green Belt. We will keep you informed of our ongoing work on this matter through our existing joint working arrangements.</p>	
Mole Valley District Council	13 October 2014	<p>This letter follows consideration of the Statement and additional discussions between Planning Policy Officers in both Councils. While I thank you for seeking my Council's views, on the evidence available to date, I do not believe Mole Valley is in a position to assist Crawley in meeting its unmet needs. This letter sets out the issues and constraints which lie behind that conclusion.</p> <p>Mole Valley District Council (MVDC) recognises the physically constrained nature of Crawley. MVDC further recognises Crawley Borough Council's (CBC) need to work together with adjoining authorities, in order to deliver urban extensions to reduce the shortfall in housing land supply.</p> <p>As set out in the Statement, co-operation between MVDC and CBC has focussed mainly on established networks between the Gatwick Diamond authorities. As is recognised in the Statement, migration links between Mole Valley and Crawley are relatively weak, compared with the levels of migration between Crawley and, for example, Horsham, Mid Sussex or Reigate and Banstead.</p> <p>There are also significant physical and policy constraints affecting the south eastern part of Mole Valley, adjacent to Crawley, which limit the potential for growth in this area, as well as people's ability to commute between Crawley and Mole Valley.</p> <p>Direct transport links 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 Crawley BC 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 no direct rail connection and only a limited bus service in the rural areas of Mole Valley.</p> <p>Gatwick Airport is a major constraint, both in physical terms and in terms of the consequences of air traffic on the southern part of Mole Valley. The attached Map 1 shows the areas of Mole Valley</p>	Member (Councillor John Northcott, Executive Member for Planning)

Crawley Borough Local Plan Duty to Cooperate Statement

November 2014

Local Authority	Date	Response	Officer or Member Level
		<p>District where development is restricted due to the noise contours around Gatwick Airport. The south eastern part of Mole Valley is also significantly impacted by flooding, as illustrated on attached Map 2, which shows the areas within Flood Zones 2 and 3 within Mole Valley District.</p> <p>Three quarters of Mole Valley District, including all the land in the south eastern quadrant, is within the Metropolitan Green Belt (see attached Map 3). The only exceptions near the Crawley boundary are very limited areas within the villages of Charlwood and Hookwood. In both cases, the land which is excluded from the Green Belt is already substantially developed.</p> <p>In general, the southern part of Mole Valley is of a rural character, with sporadic village settlements and limited infrastructure. Mole Valley District as a whole is also subject to further constraints. 36% of the District is within the Surrey Hills Area of Outstanding Natural Beauty and 45% is within the Surrey Area of Great Landscape Value (these designations overlap). There are also significant areas subject to biodiversity designations, including 1,900ha (7.6% of the District) which is designated as SSSI and/or Special Area of Conservation.</p> <p>MVDC's Core Strategy was adopted in 2009. The Core Strategy directs development to the five most sustainable built up areas in Mole Valley, namely Leatherhead, Dorking, Ashted, Fetcham and Bookham. Of these, the closest settlement to Crawley is Dorking, some 25-30km distant, depending on route and mode of transport.</p> <p>The Core Strategy also allows for infilling and minor development in six larger rural villages which are inset from the Green Belt. These include Charlwood and Hookwood, as above. In terms of housing needs, MVDC's Core Strategy is based on the Regional Spatial Strategy housing requirement of 3,760 new homes in the period 2006-2026. The Core Strategy recognises that there is not enough previously developed land within the above settlements to meet the District's housing requirements in full. It commits MVDC to a review of the existing Green Belt boundary through a site allocations plan, now known as the Housing and Traveller Sites Plan.</p> <p>Preparation of the Housing and Traveller Sites Plan is progressing. MVDC has:</p> <ul style="list-style-type: none"> • undertaken and consulted on a Green Belt Boundary Review focussed on the settlements listed above; • undertaken a call for sites, which resulted in around 100 sites being promoted for housing purposes, of which the vast majority are in the Green Belt; • prepared relevant evidence base documents including an Employment Land Review and Travellers Accommodation Assessment. 	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Local Authority	Date	Response	Officer or Member Level
		<ul style="list-style-type: none"> • carried out public consultations in January-February 2013, January-March 2014 and June-July 2014, covering the Green Belt Boundary Review, options to provide additional traveller sites and potential housing sites. <p>At the time of writing, the intention is that the draft Housing and Traveller Sites Plan will be presented to Council in January 2015, with a view to delivering the residual Core Strategy requirement which currently stands at 1,980 dwellings by 2026. The intention is that this will be met through a combination of current permissions and allocations, windfalls and site allocations.</p> <p>The Council has given priority to preparing the Housing and Traveller Sites Plan to expedite the identification of sufficient deliverable housing sites to meet the residual housing requirements of the Core Strategy, ensure there is a five year supply of deliverable housing sites and identify additional sites and pitches for the traveller community. The Council decided to take this course of action in 2013, rather than prepare a full new Local Plan for the District in view of:</p> <ul style="list-style-type: none"> • A shortage of identified housing sites in Mole Valley. Mole Valley has demonstrated an improving housing land supply position over the last few years, but has not yet achieved a five year housing land supply; the current figure standing at 4.7 years. • Significant uncertainty about the extent to which London can meet its future housing needs and the consequences for the housing market area for Mole Valley which includes London Boroughs. • Uncertainty about whether Gatwick airport will be chosen as the preferred location for a new runway and if so what the consequences would be for Mole Valley in terms of pressure to accommodate development associated with airport expansion. • The need to retain the flexibility to review the strategic priorities and preferred locations for new development in the Core Strategy in the light of the preceding two major strategic issues. <p>The Council is committed to the preparation of a new Local Plan that addresses the need to identify the District's objectively assessed needs in the light of the consequences of London's growth and the potential growth of Gatwick airport. The Local Development Scheme sets a target date of 2018 for adoption of a new Local Plan. In preparing the Local Plan, MVDC will be mindful of the constrained nature of the District and there is no certainty that Mole Valley's objectively assessed needs will be able to be met within the District boundary, bearing in mind the constraints outlined above.</p> <p>In light of the fact that there are significant uncertainties about Mole Valley's objectively assessed</p>	

Crawley Borough Local Plan Duty to Cooperate Statement
November 2014

Local Authority	Date	Response	Officer or Member Level
		needs, and in view of the constraints described above, MVDC agrees with paragraphs A.3 and A.24 of the Statement, which state that the scope for urban extensions to the north of Crawley is seriously constrained. MVDC agrees that Crawley BC is right to focus on collaborative approaches with other authorities, as set out in the Statement and in the draft Local Plan.	

Prescribed Body/ Local Plan Statutory Consultee	Date	Response
Natural England	29 September 2014	Thank you for your draft Duty to Cooperate Statement. I have no comments on the document, but look forward to commenting shortly on the submission version of your plan.
Southern Water	10 October 2014	Southern Water is the statutory water supplier for most of Crawley Borough South of Gatwick Airport. Southern Water is not a public body and we do not consider that the planning authority needs to include us when demonstrating that they have met the duty to co-operate. However, we are a specific consultation body in relation to Local Plans and we expect to be consulted in accordance with the requirements set out in regulations. Southern Water is committed to participating in the plan making process. As such, we are preparing our response to The Crawley Borough Local Plan 2015-2030 Submission Consultation Draft. If we identify any concerns as a result of the proposals set out in a Local Plan, for example any service capacity issues that we consider the planning authority would need to consider in co-operation with neighbouring authorities, we would highlight these in our consultation responses.