

Reigate & Banstead and Crawley Borough Council

Statement of Common Ground on meeting strategic housing needs

This statement has been produced in co-operation between Crawley Borough Council (CBC) and Reigate & Banstead Borough Council (RBBC). It responds to concerns highlighted by the Inspector in his Key Concerns (ID/1) and during the Exploratory Meeting (ID/4) regarding the strategic matter of scale and distribution of housing development.

1. Purpose of the Statement:

- 1.1 In paragraph 6 of ID/1 the Inspector questioned whether or not neighbouring authorities are fully meeting their own assessed needs and if not, the arrangements that are in place for cross boundary provision. At the Exploratory Meeting it was concluded on the housing issue between Reigate and Banstead Borough Council (RBBC) and Crawley Borough Council (CBC) further information, including the outcome of ongoing discussions between the two authorities, would be sought.
- 1.2 This statement of common ground seeks to outline the progress made and highlight the agreed outcomes of the cooperation.
- 1.3 It confirms that the commitments to on-going joint working, and the additional clarification that RBBC is suggesting to include in the Core Strategy, mean that CBC feels able to withdraw its remaining objection to the RBBC Core Strategy in relation to housing provision, and reiterate its comments in support of the Core Strategy: Further Amendments as set out in its representations to the recent consultation.

2. Duty to Cooperate:

- 2.1 CBC welcomes the increased emphasis RBBC has shown in its Core Strategy Further Amendments and supporting evidence base documents to meeting the Duty to Cooperate and joint working, particularly across the Gatwick Diamond sub-regional area. CBC notes Reigate and Banstead's commitment to the Gatwick Diamond Local Strategic Statement (LSS) and Memorandum of Understanding for their consistent strategic direction for the area on planning and economic issues (para 3.2b, RBBC/3 Duty to Cooperate: Additional Statement, August 2012), and the reflection of this in relation to Core Strategy priorities for the location of housing growth (paras 6.3b; 6.13 and 6.15).
- 2.2 As confirmed by the Statement of Common Ground (dated August 2012) on meeting the Duty to Cooperate and Retail issues relating to Reigate & Banstead Borough Council Draft Core Strategy (RBBC/8), CBC withdrew its previous objection on the matter of legal compliance in relation to the Duty to Cooperate, along with its objection to the soundness of the Core Strategy in relation to retail. This was as a result of further discussions which included a suggested minor modification (no. 61) by RBBC to amend paragraph 6.6.6 to clarify the position in relation to the provision for retail development at Brighton Road, Redhill and set out a clear commitment to an on-going process of engagement and cooperation in relation to meeting the legal requirements of the Localism Act.
- 2.3 In accordance with the objection on the grounds of soundness in relation to housing policy, further discussions have continued to understand the detailed strategic issues relating to housing. This has included a meeting between

officers from Reigate and Banstead and Crawley Borough Councils; officer meetings held at the Gatwick Diamond level; and the sharing of the emerging evidence base.

- 2.4 The outcomes of these meetings led to CBC's representation of support (dated 4 February 2013) to the Reigate and Banstead further amendments Core Strategy and the latest proposed modifications offered by Reigate and Banstead Borough Council.

3. Crawley's Housing Needs:

- 3.1 As highlighted in Crawley's representation to the Reigate and Banstead Core Strategy Proposed Submission Document March 2012, and further clarified by the work undertaken to develop Crawley's Local Plan Preferred Strategy Consultation Draft (Crawley 2029, published for public consultation in October 2012), despite doing all it can to maximise the potential for housing provision, Crawley is unable to achieve a supply of housing land to meet all of its housing needs within its own boundaries. This is due to very real and practical constraints to physical capacity within Crawley – including aircraft and motorway noise contours, airport land safeguarding, environmental policy constraints (sites of nature conservation importance, local nature reserves, open space), limited opportunities for infill development and tight administrative boundaries.
- 3.2 Crawley's Preferred Strategy explains the outcomes of Crawley's Locally Generated Housing Needs Assessment carried out to support the evidence base for the emerging Local Plan. This confirms a range of annual housing requirements, needed to meet the outcomes of 9 scenarios (4 of which are demographic, 4 economic and 1 of which considers affordable housing needs). These provide a range of between 120 (static employment) and 664 (short term past migration) dwellings per annum. It is considered the baseline: demographic 'natural change' scenario (542 dwellings per annum) provides a reasonable indication of housing needs emerging from within Crawley itself; multiplying up over the Plan period to provide a total locally generated housing need figure of 8,100 new homes.
- 3.3 Crawley's Strategic Housing Land Availability Assessment (September 2012) identifies a housing land supply which provides a total of 3,543 dwellings within the borough (equating to approximately 240 dwellings per annum). Crawley's Preferred Strategy set this 'supply led' figure, as the minimum housing provision across the Plan period: substantially to be met through the delivery of 9 Key Housing Sites. The largest of these is Crawley's new neighbourhood, commonly referred to as the 'North East Sector', for which outline planning permission has been granted for 1,900 new dwellings on land immediately adjoining Crawley's existing built up area.

4. Housing Market Area:

- 4.1 CBC reiterates its support for the positive approach taken by RBBC towards strategic issues across local authority boundaries as set out in its representations to the Core Strategy Proposed Submission Document March 2012 (dated 16 April 2012). In particular the proposed amended wording which included the commitment in paragraph 2.4c. to continuing to assess the key issues in partnership with adjoining authorities in relation to securing balanced and sustainable housing growth "across the sub-region".

- 4.2 The Gatwick Diamond Authorities are working closely to assess jointly housing needs studies and housing supply forecasts, whilst leaving it to individual authorities to determine most appropriate locations for new housing, to help address needs across the Gatwick Diamond, including Crawley's needs. In particular joint working is taking place between Crawley Borough Council, Horsham District Council and Mid Sussex District Council, because the three northern West Sussex authorities share a Housing Market Area (HMA). Whilst evidence varies on the exact location of the northern boundary of the NW Sussex HMA, both RBBC and CBC recognise the existence of localised movements between the South of Reigate & Banstead (Horley) and Crawley and it is appropriate that these are therefore considered by both authorities. Discussions between CBC and RBBC are therefore also being fed into the approach being taken within this Housing Market Area.
- 4.3 This approach demonstrates how local planning authorities are working together to provide for the local housing needs of the Gatwick Diamond area, in line with the Gatwick Diamond Local Strategic Statement, and to comply with the National Planning Policy Framework (NPPF) to meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework (para. 47; bullet point 1). Working together will also enable the local planning authorities to explore how to jointly meet development requirements which cannot wholly be met within a single local authority area; examples of why this may be the case include a lack of physical capacity, the presence of restrictive designations or significant harm to the principles and policies of the Framework (para. 179).
- 5. Housing Figure:**
- 5.1 CBC is satisfied that the overall figure of 460 dwellings per annum set out in the Reigate and Banstead Borough Council's Core Strategy meets the local demographic need as well as providing for an element of in-migration from adjoining Local Authorities both within East Surrey HMA and the North West Sussex HMA. This figure also reflects the level of constraint in Reigate & Banstead Borough, including through the presence of Green Belt but also areas of flood risk in non-Green Belt countryside.
- 5.2 Modifications suggested at Further Amendments stage (December 2012) confirming that the amount of housing proposed by the Core Strategy "provides for some continuing net in-migration to the borough" (para 7.4.3, Core Strategy Further Amendments consultation document) are welcomed and supported by Crawley Borough Council.
- 5.3 This has been further strengthened by an additional reference, proposed by Reigate and Banstead Borough Council (by email dated 31 January 2013) to clarify:
'provides for internally generated natural change and some continuing net in-migration into 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'.
- 5.4 RBBC would also like to confirm to the Inspector that the 'Housing Need and Demand Paper' (December 2012) should be read in the context of RBBC's position in wider housing market areas in terms of its references to in-migration.
- 5.5 Ongoing discussions between the two adjoining authorities; as part of the Gatwick Diamond Authorities; and the detailed work in relation to the North

West Sussex Housing Market Area will continue to ensure the housing needs of the housing market area are satisfactorily addressed as part of the emerging Core Strategy, Local Plans and any subsequent Development Plan Documents, and in their monitoring and review.

5.6 **Agreed Position:** The additional modification proposed by RBBC is strongly supported by CBC. CBC confirms that, along with the clarification about the read-across between evidence papers and the continual joint working and cooperation, this satisfies its concerns in relation to the housing figures and provides Crawley with the adequate level of support necessary for determining how its unmet internally generated housing needs are to be accommodated.

6. Housing Supply:

6.1 **Agreed Position:** Whilst there are inevitably some uncertainties about longer term housing land supply RBBC and CBC will continue to work together and with other adjoining authorities as site allocations and supporting policies are developed to ensure that the objectives of the Gatwick Diamond Local Strategic Statement can be secured. Crawley Borough Council will support, through future joint working and in meeting the duty to cooperate, Reigate and Banstead Borough Council in the preparation of its Development Management Policies (and site allocations) Development Plan Document.