

Statement of Common Ground between Crawley Borough Council and Reigate and Banstead Borough Council on the submission Crawley Local Plan

December 2014

Housing:

RBBC Comment/Concern:

Reigate and Banstead borough is able to provide sufficient housing to meet the full need arising from the local population; however, it is not able to fully meet its objectively assessed housing needs: this was confirmed at the Core Strategy examination in 2013.

The adopted Core Strategy housing requirement does include an element for continuing in-migration from other areas, but this allowance is lower than that assumed in government projections, and migration 'allowances' from individual boroughs/districts are not quantified in the Core Strategy due to the complexities of the housing market area for Reigate and Banstead and the inability to control where those who purchase market housing in the borough originate from.

The Reigate and Banstead Core Strategy plans for around 2,400 new homes in the southern part of the borough, the majority to be delivered through a new community to the north west of the town of Horley.

RBBC accepts that there is some housing market relationship between the southern parts of Reigate and Banstead and Crawley, however, Reigate and Banstead borough as a whole falls within the East Surrey Housing Market Area, and is strongly influenced by the presence of London.

Our own evidence suggests that the majority of inward migration flows to the borough come from other East Surrey authorities and adjoining London boroughs. Census 2011 data suggests that in the year prior to the Census there was a net outflow of over 100 people to Crawley. This trend is supported by ONS mid-year estimates which show an average net outflow from Reigate and Banstead to Crawley, since 2006, of around 80 people per year.

Therefore, whilst RBBC notes the figure of 50 dwellings per year identified in the CBC Local Plan supporting documentation (Topic Paper 5), we wish to clarify that this is not derived from or supported by RBBC policy or evidence.

CBC Response:

The role and function of Horley as part of the Northern West Sussex HMA was considered in the Strategic Housing Market Assessment (SHMA) prepared on behalf of the three northern West Sussex authorities by GVA in 2009. This concluded that the town had some characteristics in common with the northern part of the Northern West Sussex HMA (including the travel to work catchment area of Crawley extending widely in the Gatwick Diamond area and encompassing Horley).

However, it is acknowledged that Horley is fundamentally separated from the rest of the Northern West Sussex HMA by the significant physical divide created by Gatwick Airport and the A23 and M23 spur road, and the town is also included within the East Surrey Housing Market Area SHMA (completed in 2008 by DCA).

The Northern West Sussex SHMA update (2014) confirms that Horley is identified as falling principally into the East Surrey HMA, but with some recognised overlap with the Northern West Sussex HMA.

CBC considers that a part of the housing growth in RBBC (primarily in Horley, as the closest urban centre to Crawley) will be to assist Crawley in meeting its unmet housing needs, particularly as, in the future, Crawley becomes increasingly constrained and less land is available for further residential development, leading to changes in migration patterns with increased flows away from Crawley. It is important that future needs of residents who would have historically gravitated to, or remained within, the borough are adequately met in appropriate locations close to Crawley and in similar affordability levels, in so far as is reasonably and sustainably possible.

Position of Agreement:

RBBC Core Strategy allows for some continuing in-migration from other local authorities including those within the East Surrey and North West Sussex housing market areas (a total of around 90 – 130 dwellings per year).

There is some relationship between the North West Sussex Housing Market Area and the Horley area, in which 2,440 dwellings are allocated between 2012 and 2027.

However, given the complexities of the housing market area for Reigate and Banstead and the inability to control where those who purchase market housing in the borough originate from it is not possible for the Crawley Local Plan to quantify the total or proportion of its needs that will be met in Reigate and Banstead and, subsequently, the Local Plan does not rely on this.

An approximate, low figure of potential numbers per annum is included in the CBC evidence base to help illustrate where unmet needs may be addressed, whilst recognising that planned and committed new dwellings in close proximity to Crawley borough's borders do not technically count towards its housing delivery. This figure is not derived from or supported by RBBC.

CBC and RBBC will continue to work together with neighbouring authorities to maximise sustainable housing development opportunities across the wider area.

Employment:

RBBC Comment/Concern:

The RBBC 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.

RBBC does not object to the overall approach to employment land provision, however, seeks clarification in relation to some of the content of the Topic Paper 5 (Unmet Need), in particular:

- Table 5: the employment development currently planned in Reigate and Banstead is to meet local, rather than strategic, needs.
- Appendix B: the green 'planned strategic employment locations' shown in Reigate and Banstead are incorrect.

CBC Response:

CBC welcome RBBC recognition of the significant land supply challenges faced in accommodating a significant demand for business land over the Plan period, as identified by the EGA (NLP, 2014), and its support for the approach of Local Plan Policy EC1.

To inform the approach of Local Plan Policy EC1, CBC has worked positively with land owners and developers to bring forward an Employment Land Trajectory (ETL). This explores the possible opportunities within Crawley (subject to Gatwick Airport safeguarding) to accommodate the identified need for business land. However, with safeguarding representing a delivery constraint at present, it is recognised that locations at or beyond Crawley's administrative boundary may need to be considered through joint working in the event that safeguarding remains. In this regard, the council welcomes the continuation of the positive joint working with RBBC and the other Gatwick Diamond authorities.

For clarity, reference within the Unmet Needs Paper (CBC Topic Paper 5) to 'strategic sites' in RBBC is intended to refer to the scale and size of development, rather than viewing the sites as potentially accommodating (in part) Crawley's unmet business land requirements. It is appreciated that the intention of these sites is to meet RBBC's own objectively assessed needs, though recognised that commuter movements within the Gatwick Diamond will mean that there is likely to be some cross-over. CBC welcomes emerging work being undertaken by RBBC to consider whether there is the scope and/or opportunity for further employment development within its borough to help meet strategic needs for the economic growth of the sub-region.

Position of Agreement:

Appendix B of Topic Paper 5 has been amended to show the correct location of the main employment sites in Reigate and Banstead (see Annex).

Clarity has been provided in Topic Paper 5 that Table 5 refers to employment sites defined by scale and size rather than sites that could potentially accommodate Crawley's unmet business needs.

CBC and RBBC will continue discussions regarding employment land. CBC will feed into RBBC's work to explore the potential for strategic employment development as part of the considerations for meeting needs following the outcome of the Airport Commission's investigation into additional runway capacity in the south east.

Retail:

RBBC Comment/Concern:

RBBC supports the principle of the growth of Crawley Town Centre, subject to this being of a scale that allows the potential of Redhill to also be fulfilled. However, RBBC considers that the Crawley Local Plan does not currently provide certainty about the planned level of retail growth. Without an identified quantum of growth, or phasing information, RBBC cannot be sure that proposals for retail growth in Redhill and Crawley are complementary.

Retail floorspace figures should be set out in the Crawley Local Plan policy to limit the risk that future proposals for Crawley town centre (for example, a revived Town Centre North scheme) will be proposed that could have an adverse impact on the role, market share and vitality of nearby town centres and the viability of any committed or planned investments in them.

CBC Response:

The submission Local Plan recognises that Town Centre North (TCN) will not now be brought forward within the Plan period, and no longer proposes a formal site allocation for retail-led step-change regeneration at this location. Town Centre opportunity sites are still identified

in the Local Plan, as potential mixed use sites with a focus on residential development alongside retail, leisure, or office development, but no specific retail proposals are currently being progressed. Without TCN, the council recognise that the overall capacity for comparison retail floorspace during the Plan period is reduced, from 32,900 square metres down to 26,650 square metres. This reduced figure results from the recognition that without TCN Crawley is less able to 'claw back' expenditure from other centres. The impact on other centres is reduced from that identified within the 2013 DTZ analysis, and it is, therefore, considered that even if the reduced level of retail floorspace identified in the Local Plan evidence base was all developed, it would not result in a significant impact on the vitality and viability of Redhill or other nearby retail centres.

CBC remains supportive of plans within the adopted Reigate and Banstead Core Strategy to deliver additional convenience and comparison retail across the borough over its Plan period, and is committed to continuing the positive joint working between the two local planning authorities. On this basis, it is agreed that the Local Plan would benefit from more clearly referencing the identified capacity of retail floorspace in Crawley over the Plan period, and it is suggested that wording to this effect is added to the supporting text of Local Plan Policy EC7.

Position of Agreement:

RBBC and CBC acknowledge the similar roles of Crawley and Redhill town centres as sub-regional strategic centres of significance in the retail hierarchy, as identified in the Gatwick Diamond Local Strategic Statement. Both authorities are committed to working together to ensure a coordinated approach to retail can be taken where both Crawley and Redhill can fulfil their respective roles.

The identified capacity of retail floorspace in Crawley over the Plan period will be included in the supporting text of the Crawley Local Plan Policy EC6, as follows:

5.56 As identified within the Crawley Retail Capital and Impact Study (2013), there is capacity to support up to 26,650 square metres of comparison (non-food) retail development up to 2030. This represents a modest increase in floorspace, and is significantly less than levels previously envisaged in the Core Strategy (2008) at Town Centre North, which is no longer being progressed. Any retail growth up to this level is not of a scale that would change the market shares of expenditure attracted from the wider catchment area, and, therefore, unlikely to have any significant negative retail impact on other town centres.

Along with a commitment in the Local Plan to monitor the delivery of floorspace in the town centre.

G&T:

RBBC Comment/Concern:

Whilst RBBC is committed to meeting its identified needs as far as possible, the council has not concluded the technical work needed to be able to conclude whether or not 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.

Whilst RBBC recognises the variety of constraints that different authorities are faced with, it is keen to work closely with CBC and other nearby districts/boroughs to understand – in the

event that Reigate and Banstead is unable to meet its own needs – if, and how, these could be met across the wider area.

CBC Response:

CBC welcomes the confirmation from RBBC to the commitment to meeting identified Traveller accommodation needs as far as possible, in line with the agreed approach across the Gatwick Diamond endorsed at the meeting of Gatwick Diamond Authority Members, held on 16 April 2013:

- 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 within the counties and the Gatwick Diamond and, as appropriate, with other local authorities.

CBC has undertaken a detailed accommodation needs assessment for its Travelling community and on this basis has identified a potential, reserve site for meeting permanent needs which may arise from the community currently living within the borough over the Plan period. As a constrained borough this has proven extremely difficult and, following an assessment of 40 sites over a number of years, only one site has been short-listed as possible for meeting such a potential need; the remainder of the sites are subject to environmental health constraints such as noise from the airport or flooding, or are within the built up area and therefore subject to access or amenity constraints, due to the planned nature of the new town.

Whilst the site identified has numerous constraints, including lying within the High Weald Area of Outstanding Natural Beauty, adjacent to a country park and SSSI, and has significant highway access difficulties, it is deliverable if required to meet the potential need in Crawley, and is therefore believed to be the appropriate ‘sound’ approach to take to meet the legal and policy responsibilities expected of the council, given the extremely constrained nature of land in Crawley.

The site itself only partly falls within Crawley borough and this area is further reduced by the land take necessary for road improvements needed to create a safe access for caravans and bunding and screening required for mitigation of impact of development in the AONB. Therefore, there is no capacity remaining to meet other needs arising from outside of the borough.

Position of Agreement:

Include reference in the reasoned justification to Policy H5 to continued joint/cross boundary working as follows:

6.71 ... future expansion of Gatwick Airport. The council will continue to work cooperatively with its neighbouring authorities to maintain constructive joint working across the Gatwick Diamond.

CBC and RBBC will continue to work towards meeting needs arising from within each authority area within that authority area for this Plan period, so far as this is consistent with national policy.

CBC and RBBC will continue to work with each other and other neighbouring authorities to explore how any unmet needs may be met in the future.

Signed for Reigate and Banstead Borough Council:

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Name:

Position:

Dated:

Signed for Crawley Borough Council:

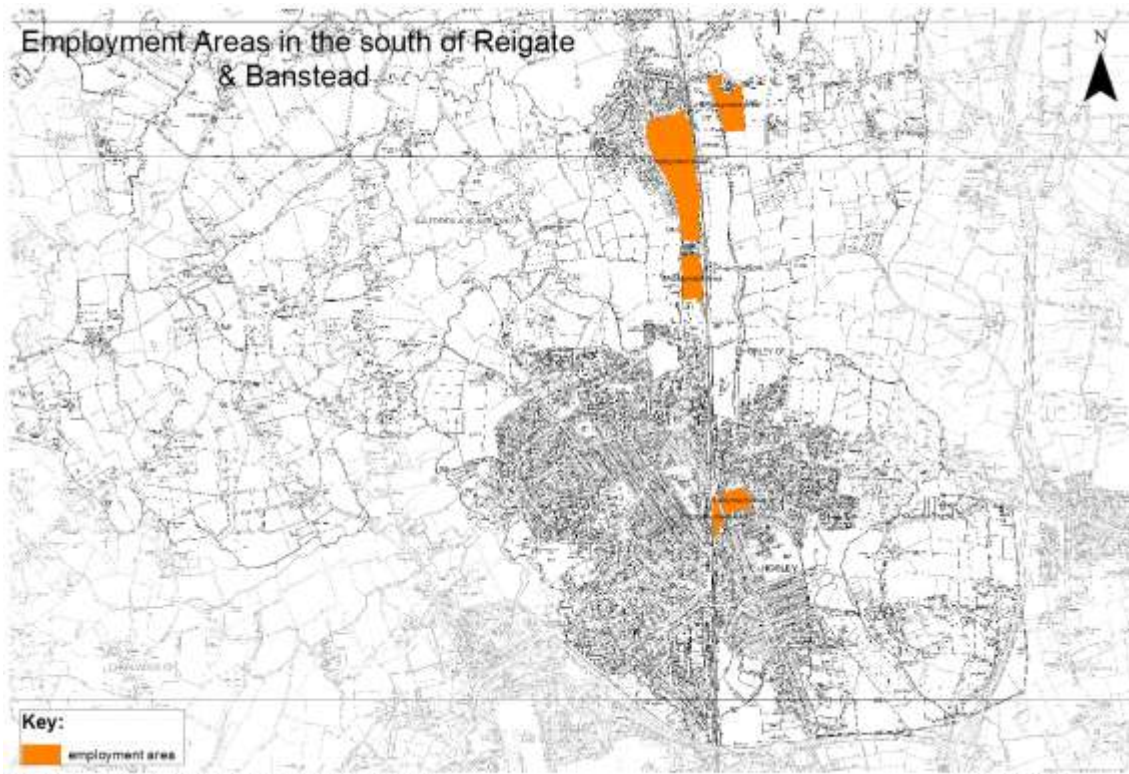
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Name:

Position:

Dated:

ANNEX



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Identified land parcels are for options analysis and appraisal only. Site allocations will be set out in the Development Management Policies DPD.

Scale 1:20,000