

CRAWLEY BOROUGH LOCAL PLAN EXAMINATION

Crawley Borough Council Response to Inspector's
Matters, Issues and Questions

Matter 1: Legal Compliance and Procedural Matters
Appendices

February 2015



MATTER 1: LEGAL COMPLIANCE AND PROCEDURAL MATTERS APPENDICES

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 - **Mid Sussex District Plan:**
 - **Preferred Strategy (January 2012)**
 - **Publication: Housing and Economy Representation (June 2013)**
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 - **Horsham District Planning Framework:**
 - **Housing Numbers Consultation (April 2012)**
 - **Preferred Strategy (October 2013)**
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APPENDIX A: TIMELINE FOR KEY DUTY TO COOPERATE MILESTONES (FEBRUARY 2015)

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
Adoption of West of Crawley Joint Area Action Plan	July 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
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>

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

Milestone	Date
Gatwick Diamond Initiative GROW Group	26 June 2012
West Sussex Chief Planning Officer Group	6 July 2012
Northern West Sussex Authorities Planning Officers: Position Statement	13 July 2012
West Sussex Joint Planning Board	13 July 2012
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

Milestone	Date
<i>Crawley/West Sussex County Council: Transport Modelling</i>	13 December 2012
<i>Crawley/Reigate & Banstead: RBBC Core Strategy</i>	8 January 2013
<i>Gatwick Airport Transport Forum Steering Group</i>	9 January 2013
<i>West Sussex Planning Policy Officers CIL Group</i>	9 January 2013
<i>Crawley/Mid Sussex: MSDC District Planning Gypsy and Traveller Assessment telephone interview</i>	17 January 2013
<i>Gatwick Officers Group</i>	23 January 2013
<i>Gatwick Diamond GROW Strategy Project Group</i>	23 January 2013
<i>Green Infrastructure Network</i>	23 January 2013
<i>Crawley/Gatwick Airport: Crawley Local Plan</i>	25 January 2013
<i>Crawley/Horsham: Strategic Urban Extensions</i>	30 January 2013
<i>Gatwick Airport Consultative Committee</i>	31 January 2013
Economic Assessment of Growth at Gatwick Airport, Berkeley Hanover Consulting Limited (BHC)	February 2013
<i>Gatwick Airport Noise and Track Monitoring Advisory Group</i>	14 February 2013
<i>AONB Officer Steering Group</i>	25 February 2013
<i>Mid Sussex Gypsy, Traveller and Travelling Showpeople Workshop</i>	27 February 2013
<i>West Sussex Planning Policy Officers Group</i>	8 March 2013
<i>Northern West Sussex Authorities Chief Executives Strategic Planning</i>	13 March 2013
<i>Crawley/Horsham: Viability Workshop</i>	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
<i>AONB Joint Advisory Committee</i>	25 March 2013
<i>Northern West Sussex Authorities Planning Officers: EGA</i>	26 March 2013
<i>Gatwick Joint Local Authorities</i>	27 March 2013
<i>Gatwick Airport Transport Forum Steering Group</i>	24 April 2013
<i>Northern West Sussex Authorities Planning Officers: Position Statement</i>	24 April 2013
<i>Gatwick Diamond GROW Strategy Project Group</i>	10 April 2013
<i>Gatwick Diamond Local Authorities Portfolio Holders</i>	16 April 2013
<i>Gatwick Airport Consultative Committee</i>	16 April 2013
<i>Gatwick Diamond GROW Strategy Project Group</i>	23 April 2013
<i>Northern West Sussex Authorities Planning Officers: Position Statement</i>	24 April 2013
<i>Crawley/Southern Water</i>	2 May 2013
<i>Northern West Sussex Authorities Planning Officers: EGA</i>	10 May 2013
<i>Northern West Sussex Authorities Planning Officers: EGA</i>	13 May 2013
<i>Gatwick Airport Noise and Track Monitoring Advisory Group</i>	16 May 2013
<i>Crawley/Mid Sussex: Strategic Urban Extensions</i>	22 May 2013
Local Plan Crawley 2029 Additional Sites Consultation Starts	3 June 2013
<i>West Sussex Planning Policy Officers Group</i>	7 June 2013
West Sussex Local Flood Risk Management Strategy	10 June 2013
<i>Crawley/Mid Sussex: MSDC District Planning</i>	11 June 2013
<i>Gatwick Officers Group</i>	11 June 2013
<i>Northern West Sussex Authorities Planning Officers: EGA</i>	12 June 2013
<i>Northern West Sussex Authorities Planning Officers: Position Statement</i>	14 June 2013
Crawley Borough Council response to Mid Sussex District Plan Proposed Submission consultation	17 June 2013
<i>Gatwick Diamond GROW Strategy Project Group</i>	18 June 2013
<i>Green Infrastructure Network</i>	27 June 2013
Local Plan Crawley 2029 Additional Sites Consultation Ends	1 July 2013

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

Milestone	Date
<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
Email out draft CBC DtC statement to all Prescribed Bodies for comment and fact-checking	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>Gatwick Diamond Management Board Meeting</i>	21 January 2014
<i>Biodiversity Record Centre</i>	21 January 2014
<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 Meeting</i>	22 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 Diamond Leaders Growth Strategy Meeting</i>	30 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 Meeting</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>West Sussex Local Authorities Leaders Event</i>	9 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>West Sussex Chief Executives Meeting</i>	23 April 2014
<i>Publication of Economic Growth Assessment (EGA), NLP</i>	23 April 2014
<i>Gatwick Diamond Management Board Meeting</i>	29 April 2014
<i>West Sussex County Joint Leaders</i>	7 May 2014
<i>Northern West Sussex: Strategic Sites & Broad Location SHLAA</i>	7 May 2014

Milestone	Date
<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
Crawley Borough Council officer comments to HDC draft Duty to Cooperate Report	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>West Sussex Chief Executives Meeting</i>	2 June 2014
<i>Gatwick Officers Group</i>	4 June 2014
<i>West Sussex Planning Policy Officers Group</i>	6 June 2014
<i>Gatwick Diamond Overview Forum Meeting</i>	13 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
Crawley Borough Council response to the submission Horsham District Planning Framework	26 June 2014
Crawley Borough Council response to the Horsham District Council Duty to Cooperate formal request	26 June 2014
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>	1 July 2014
<i>Gatwick Area Airports Commission Visit</i>	9 July 2014
<i>Gatwick Airport Sub-Groups: Housing and Employment</i>	9 July 2014
<i>Gatwick Diamond Management Board Meeting</i>	15 July 2014
<i>Crawley/Horsham/WSCC/West of Ifield Consortium Consultants</i>	15 July 2014
<i>Northern West Sussex Senior Planning Officers: Position Statement Update</i>	16 July 2014
<i>Gatwick Airport Sub-Groups: Transport Working Group</i>	17 July 2014
<i>Gatwick Airport Transport Forum Steering Group</i>	17 July 2014
<i>Northern West Sussex: SHMA</i>	18 July 2014
<i>Gatwick Airport Consultative Committee</i>	24 July 2014
<i>Gatwick Diamond GROW Strategy Project Group</i>	28 July 2014
Crawley Borough Council response to the Tandridge District Council Joint SHMA request	28 July 2014
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>	14 August 2014
Email out draft CBC DtC Statement to all Prescribed Bodies for comment and fact-checking	19 August 2014
Formal Letter to all Neighbouring Authorities to clarify Crawley Borough level of unmet needs	19 August 2014
<i>Crawley/Brighton and Hove: Strategic Planning & Unmet Needs</i>	22 August 2014
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>	2 September 2014
<i>Northern West Sussex: SHMA</i>	5 September 2014

Milestone	Date
<i>Crawley/Mole Valley: Crawley Local Plan & Planning Policy in Mole Valley</i>	9 September 2014
<i>West Sussex Planning Policy Officers Group</i>	12 September 2014
<i>Crawley/West Sussex County Council: Transport Modelling & Infrastructure</i>	18 September 2014
<i>West Sussex County Chief Executives Meeting</i>	22 September 2014
<i>Gatwick Diamond GROW Strategy Project Group</i>	22 September 2014
CBC signed Lewes District Council's Duty to Cooperate Statement of Common Ground	30 September 2014
<i>Crawley/Mid Sussex: Objectively Assessed Housing Needs</i>	1 October 2014
<i>Crawley/Horsham: Horsham District Planning Framework</i>	1 October 2014
<i>Crawley/Reigate and Banstead: Crawley Local Plan</i>	8 October 2014
CBC response to Tandridge District Council's Duty to Cooperate Scoping Report	9 October 2014
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>	29 October 2014
<i>Bedford 51 Joint Letter, on behalf of 60 local authorities in the South East, Response to London Infrastructure Plan</i>	31 October 2014
<i>Northern West Sussex Authorities Planning Officers: Horsham District Planning Framework</i>	31 October 2014
West Sussex County Joint Leaders and Chief Executives	3 November 2014
<i>Crawley/Horsham: participation at Horsham District Planning Framework Examination Hearing</i>	4 November 2014
<i>Crawley/Horsham: participation at Horsham District Planning Framework Examination Hearing</i>	5 November 2014
<i>Crawley/Horsham: attendance at Horsham District Planning Framework Examination Hearing</i>	14 November 2014
<i>Crawley/West Sussex County Council/Highways Agency</i>	18 November 2014
<i>Gatwick Diamond Overview Forum Meeting</i>	21 November 2014
Submission of Crawley 2030: Local Plan 2015 – 2030 for Examination	26 November 2014
<i>Gatwick Officers Group</i>	27 November 2014
<i>Gatwick Diamond GROW Strategy Project Group</i>	27 November 2014
<i>Crawley/Mid Sussex: Sustainability Assessment of Unmet Needs</i>	8 December 2014
<i>Gatwick Officers Group: Employment and Housing Group</i>	8 December 2014
<i>Crawley/West Sussex County Council/Gatwick Airport Limited</i>	8 December 2014
Circulation of draft HEDNA consultant brief: email to adjoining authorities for comments	11 December 2014
Comments received from Mole Valley District Council on draft HEDNA consultant brief	15 December 2014
Comments received from Reigate and Banstead Borough Council on draft HEDNA consultant brief	18 December 2014
Comments received from Mid Sussex District Council on draft HEDNA consultants brief	18 December 2014
<i>West Sussex Chief Executives/Gatwick Airport Limited</i>	7 January 2015
<i>Gatwick Officers Group</i>	7 January 2015
<i>Gatwick Diamond GROW Strategy Project Group</i>	7 January 2015
Gatwick Joint Local Authorities (GOG Members)	13 January 2015
<i>West Sussex Planning Policy Officers Group</i>	13 January 2015
Crawley Borough Council response to Mid Sussex District Plan Regulation 18 consultation	16 January 2015
<i>Gatwick Diamond Management Board Meeting</i>	20 January 2015
<i>Crawley/Mid Sussex: Mid Sussex Numbers</i>	4 February 2015

Milestone	Date
<i>West Sussex Chief Planning Officer Group</i>	<i>6 February 2015</i>
Reigate and Banstead Borough Council and Crawley Borough Council Statement of Common Ground on Crawley Local Plan	9 February 2015
<i>Crawley/Reigate & Banstead: Strategic Employment</i>	<i>10 February 2015</i>
<i>NWS Evidence Meeting</i>	<i>11 February 2015</i>
<i>Crawley/Mid Sussex/Horsham: NWS Position Statement</i>	<i>12 February 2015</i>
Crawley Borough Council and Horsham District Council Statement of Common Ground on Climate Change	23 February 2015
Northern West Sussex Position Statement Revised February 2015: signed by LA Planning Portfolio Holders	26 February 2015
Environment Agency and Crawley Borough Council Statement of Common Ground	26 February 2015
<i>Gatwick Officers Group</i>	<i>26 February 2015</i>
<i>Gatwick Diamond GROW Strategy Project Group</i>	<i>26 February 2015</i>
<i>Horsham Duty to Cooperate Workshop: Portfolio Holders</i>	<i>2 March 2015</i>
<i>West Sussex Planning Policy Officers Group</i>	<i>10 March 2015</i>
<i>West Sussex County Chief Executives</i>	<i>13 March 2015</i>
Examination Hearing Sessions for Crawley 2030: Local Plan 2015 – 2030	16 March 2015 – 27 March 2015
<i>Greater London Wider South East Summit: Leaders</i>	<i>19 March 2015</i>
<i>Gatwick Diamond Management Board Meeting</i>	<i>28 April 2015</i>
<i>West Sussex County Chief Executives</i>	<i>7 June 2015</i>
<i>West Sussex Planning Policy Officers Group</i>	<i>9 June 2015</i>
<i>Gatwick Diamond Overview Forum Meeting</i>	<i>19 June 2015</i>
<i>Gatwick Diamond Management Board Meeting</i>	<i>14 July 2015</i>
<i>West Sussex County Chief Executives</i>	<i>7 September 2015</i>
<i>West Sussex Planning Policy Officers Group</i>	<i>8 September 2015</i>
<i>Gatwick Diamond Management Board Meeting</i>	<i>20 October 2015</i>
<i>West Sussex County Chief Executives</i>	<i>25 November 2015</i>
<i>Gatwick Diamond Overview Forum Meeting</i>	<i>27 November 2015</i>
<i>West Sussex Planning Policy Officers Group</i>	<i>8 December 2015</i>

APPENDIX B: CORRESPONDENCE IN RELATION TO CRAWLEY'S UNMET NEEDS

CBC submissions to adjoining authorities Local Plans

- 1. Reigate and Banstead Core Strategy**
- 2. Mid Sussex District Plan**
- 3. Horsham Planning Framework**

1. Reigate and Banstead Core Strategy

Part B: Please use a separate sheet for each representation			
(2) Name/Organisation	<input type="text" value="Crawley Borough Council"/>		
(3) To which part of the Core Strategy: Proposed Submission Document does this representation relate?			
Policy	<input type="text"/>	Paragraph	<input type="text"/>
		Box/map	<input type="text"/>
(4) Do you consider the Core Strategy: Proposed Submission Document...			
(a) Legally compliant?	Yes	<input type="text"/>	No
			<input type="text" value="X"/>
(b) Sound?	Yes	<input type="text"/>	No
			<input type="text" value="X"/>
<i>If you have answered 'no' to question 4(b) please continue to Question 5. In all other circumstances, please go to Question 6.</i>			
(5) Do you consider the Core Strategy is unsound because it is <u>not</u> :			
(a) Justified	<input type="text" value="X"/>		
(b) Effective	<input type="text"/>		
(c) Consistent with national policy	<input type="text" value="X"/>		
(d) Positively prepared	<input type="text"/>		
(6) Please give details of why you consider the Core Strategy Proposed Submission Document is not legally compliant or is unsound. Please be as precise as possible referring to the compliance matters and test of soundness. If you wish to support the legal compliance or soundness of the Core Strategy Proposed Submission Document, please also use this box to set out your comments.			
<p>Crawley Borough Council welcomes the positive approach which Reigate & Banstead Borough Council has been taking towards strategic issues which cross local authority boundaries. It is pleased to note that, along with other local authorities, including Crawley, the Council has approved the Local Strategic Statement for the 'Gatwick Diamond' area and signalled its commitment to further joint work on these strategic issues. Crawley Borough Council believes that, through a spirit of cooperation and joint working, it should be possible to maintain a broad but consistent approach towards strategic planning and development issues whilst respecting the discretion of the individual authorities to determine the future planning of their areas.</p> <p>However, this work remains on-going and as such Crawley Borough Council considers there are 2 main areas in which the Reigate and Banstead Core Strategy does not appear to be currently supported by sufficient evidence and justification to provide Crawley Borough Council with the comfort that strategic priorities are being met. In line with the spirit of the Gatwick Diamond Local Strategic Statement and its associated Memorandum of Understanding, it is anticipated that the two Councils will work together to address these issues in advance of the Examination and, if possible, enable Crawley Borough Council to withdraw its representations.</p> <p><u>Housing Market Area</u> The newly published National Planning Policy Framework (NPPF) confirms that Local Plans must</p>			

seek to meet the objectively assessed needs for market and affordable housing in the housing market area (para. 47).

From the evidence base accompanying the Submission Core Strategy (provided by the Housing Context Technical Paper) it appears that the chosen housing figure of 460 dwellings per annum (dpa) meets the demographic needs (incorporating a more balanced migration pattern) and equates with identified supply. To this extent Crawley Borough Council are supportive of Reigate and Banstead's positive approach to meeting their demographic housing needs within their boundaries.

Beyond this, however, Crawley Borough Council are concerned that the evidence fails to appreciate fully the wider housing markets in which Reigate and Banstead's administrative boundary sits. The 2009 Housing Market Update Report provides evidence on Housing Needs across the East Surrey Housing Market Area (Epsom and Ewell, Mole Valley, Tandridge and Reigate and Banstead). However, the 2012 SHMA update and associated evidence solely looks at Reigate and Banstead's needs and not the demographic needs across the Housing Market Area. There is no explanation in this document about the nature of the Housing Market Areas in Reigate and Banstead.

The Housing Technical Paper (August 2011) identifies the demographic housing needs within Reigate and Banstead and not across the wider Housing Market Area; this is in conflict with paragraphs 47 and 159 of the NPPF which talk about using evidence base to meet objectively assessed needs for market and affordable housing in the Housing Market Area and using a Strategic Housing Market Assessment (SHMA) to assess full housing needs, and to work with neighbouring local authorities where Housing Market Areas cross boundaries.

Based on the information provided, the proposed Submission Document (March 2012) appears to cater for the housing needs of the borough only to 2027 with no consideration or reference to meeting needs across the wider Housing Market Areas. Whilst the SHMA is part of the wider East Surrey Housing Market area – it is essentially an assessment of the Borough's needs only, with little explanation of how the Local Housing Market functions. This is probably due to the age of the document, which would have been prepared when Regional Spatial Strategies would have provided the strategic context for housing delivery across the wider area beyond Local Authority Boundaries.

Furthermore, much of the housing market work which has been done is Surrey based with the adjoining three authorities, and there is no explanation with the Northern West Sussex Housing Market Area. It is considered likely that a small percentage of Crawley residents looking for a new home will look to, and find accommodation in Reigate and Banstead – particularly to the south of the borough in the Horley area. It is acknowledged that affordability may be a significant constraint to the wider borough of Reigate and Banstead meeting needs of Crawley residents, and this may arguably point to the larger proportion of Crawley's housing needs being met within the West Sussex area of the Gatwick Diamond – however, this relationship is yet to be fully explored and understood.

Retail

Crawley Borough Council is broadly supportive of aspirations to deliver 25,800m² comparison and 11,700m² convenience in Reigate and Banstead over the plan period, with approximately 15,480m² comparison and 7,020m² convenience directed to Redhill (Box 4, page 21).

In responding to the Redhill Area Action Plan, the Council has expressed some concerns regarding the possible allocation of the Brighton Road site for a further 8,500-18,500m² comparison floorspace in addition to that identified in the Core Strategy. In particular, it was felt that in referring to the delivery of 'at least' 25,800m² the plan creates uncertainty, with concern

raised as to the impact this further quantum of retail floorspace could have on the deliverability of the identified Town Centre North allocation in Crawley.

(7) Please set out what change(s) you consider necessary to make the Core Strategy Proposed Submission Document legally compliant or sound, having regard to the test you have identified at question (5) above where this relates to soundness.
 You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Housing

The Gatwick Diamond Local Strategic Statement indicates that the Local Authorities will 'seek to secure sufficient housing... to meet the needs of those who live or work in the area, including needs arising from a repositioned Gatwick Diamond economy'.

Crawley Borough Council is currently doing all it can to maximise the potential for meeting housing needs within its own boundaries – including reviewing every possible option by undertaking further critical urban capacity study assessments and reassessing site capacity yields. However, it is becoming increasingly clear, through early evidence, that it will be unable to achieve a supply which can satisfy the baseline figure identified through the Locally Generated Housing Needs Assessment for meeting its demographic growth (circa. 540 dwellings per annum). This is due to the very real and practical constraints to physical capacity within Crawley – including noise contours, limited opportunities for infill development and tight administrative boundaries.

Crawley Borough Council would therefore like to work with our neighbouring authorities to see how these demographic needs might be addressed in the context of the wider Gatwick Diamond area and to establish if there are any solutions which can be agreed as acceptable. This strategic discussion, as far as possible, should take place during the preparation of the respective Development Plans for each of the Local Authorities, rather than on a piecemeal basis. In this context, we fully support partnership working carried out so far to produce the Gatwick Diamond Local Strategic Statement and Memorandum of Understanding. It is important that this positive partnership working is continued in practice to demonstrate evidence of successful cooperation in planning for strategic priorities.

It is hoped that through continual work at the Gatwick Diamond level will provide sufficient information to support assumptions regarding the housing market areas within, and effecting, the Gatwick Diamond authorities; particularly in relation to the economic context and travel to work areas. On this basis, Crawley Borough Council seek to secure mutual agreement on strategic housing issues building on evidence undertaken at the local level within each authority area and reflecting the aspirations of local communities.

Retail

Having discussed the proposals at officer level, it is now understood that Reigate and Banstead is not currently pursuing 'step-change' retail development in the short term. Rather, Reigate and Banstead Borough Council has identified Brighton Road as a provisional site which may come forward towards the end of the plan period subject to a number of triggers having been met. In this regard, the retail position in the Reigate and Banstead Borough Council Core Strategy could be made clearer by more closely linking to the policy triggers identified in the Redhill Area Action Plan, making clear the factors that would need to be satisfied before the Brighton Road site comes forward.

If possible, Crawley Borough Council would also request that the Core Strategy/AAP add an additional trigger requiring that modelling is undertaken to consider the impact of additional comparison floorspace coming forward at Brighton Road on the vitality and viability of Crawley

Town Centre as existing, and also on deliverability of a step-change retail-led development at the allocated Town Centre North site. This approach would reflect the requirement of NPPF paragraph 26.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

(8) If your representation is seeking a change to the Core Strategy Proposed Submission Document, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

(9) If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The fundamental concerns relate to recent changes in national, regional, sub-regional and local planning are such that discussion through examination may be necessary to fully explore the matter.

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

2. Mid Sussex District Plan

Contact: Tom Nutt

Date: January 4th 2012

Direct Line: 01293 438585

Email: tom.nutt@ Crawley.gov.uk

Peter Browning
Environment and Housing Directorate

District Plan Consultation
Planning Policy and Economic Development
Mid Sussex District Council at Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

CONSULTATION RESPONSE - MID SUSSEX DISTRICT PLAN CONSULTATION DOCUMENT

Dear Sir/Madam

Thank you for providing Crawley Borough Council with the opportunity to comment on the Mid Sussex District Plan Consultation Draft. This response is submitted at an officer level, but has been endorsed by the Council's Cabinet Member for Planning and Economic Development.

We note the Council's intention to plan for and allocate sufficient land for the development of 530 dwellings per annum and to bring forward a strategic employment allocation at Burgess Hill.

Before formalising our position on these proposals, we believe that there is a need to develop our partnership working in line with the Gatwick Diamond Local Strategic Statement and Memorandum of Understanding. In particular, it is important that full consideration is given to:

i) the housing requirements across the wider Gatwick Diamond and the functional dependencies across planning authority boundaries. This is especially the case now that Mid Sussex District Council has reduced its housing figures substantially below the South East Plan requirements.

ii) the case for a strategic employment allocation within the Gatwick Diamond, building upon the conclusions and recommendations of the North West Sussex Employment Land Review. In addition, consideration needs to be given to the most appropriate location for it and the wider economic implications of varying scales and forms of development. If it is indeed determined that such an allocation would be best located at Burgess Hill, we would also wish to see an evidence base developed which demonstrates that the proposal would not jeopardise the economic strategies of adjoining authorities. For Crawley, a key issue will be ensuring that the scale and form is appropriate and would not jeopardise the regeneration of the Manor Royal Business Estate.

Recognising your ambitious programme for completing work on the local plan, we would be happy to work with you at the earliest opportunity to address these key issues. We would also welcome the opportunity to work together to determine a sub-regional approach to the provision of sites for Gypsies, Travellers and Travelling Showpeople.

We hope that through this joint working we will be able to resolve our concerns about the strategic housing and employment provisions of your draft plan, in good time to suit your published programme.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Nutt', with a long horizontal stroke extending to the left.

Tom Nutt
Planning Officer

3. Effective

[Empty box for response to question 3]

4. Consistent with national policy

[Empty box for response to question 4]

6a) If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected 'unsound' for any of these tests please also complete question 6b

Crawley Borough Council supports the Mid Sussex District Council District Plan, subject to agreement being reached on the position statement and clear outcomes achieved through the ongoing joint working.

This representation provides a detailed explanation of Crawley Borough Council's understanding of the strategic context and the way in which this influences the scope of the Mid Sussex District Plan.

Duty to Cooperate:

Crawley Borough Council confirms that it considers the Mid Sussex District Plan to be both legally compliant and 'sound' in relation to meeting the Duty to Cooperate.

Joint working across the two local authority areas pre-dates its formalisation through the Gatwick Diamond Initiative and the statutory duty to cooperate imposed by the Localism Act 2011. Critically, this representation has been prepared in the context of continual joint working between Crawley Borough Council and Mid Sussex District Council, including, following a history of joint working as neighbouring authorities, the commissioning of joint strategic evidence base as part of the three Northern West Sussex Authorities and the ongoing joint working as part of the Gatwick Diamond, including the adoption of the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement.

The representation is made on the basis of the emerging joint Position Statement between Crawley Borough Council, Horsham District Council and Mid Sussex District Council and the assumption that this will be agreed before the District Plan examination hearings.

A number of strategic evidence base documents have been recently prepared to support the preparation of the individual authorities' Local Plans; these were jointly commissioned by Crawley Borough Council, Horsham District Council and Mid Sussex District Council, and include:

- Joint Northern West Sussex Strategic Housing Market Assessment (2009)
- Joint Northern West Sussex Economic Appraisal and Employment Land Review (2009/2010)
- At Crawley Study (2009)
- New Market Town Study (2010)
- Joint Northern West Sussex Strategic Housing Market Assessment Update (2012)
- Joint Northern West Sussex Economic Growth Assessment (pending)

It is also pertinent to note that the three authorities have carried out individual assessments into their own objectively assessed housing needs. The results from the three assessments have been discussed and analysed between the Northern West Sussex local authorities at both officer and member level. The outcomes of these studies and discussions will form the basis for the position statement, along with the emerging new evidence in relation to the economic growth agenda.

The Position Statement is expected to show how the housing market area is intending to meet its objectively assessed housing and economic needs, as far as is consistent with the policies set out in the NPPF and the local evidence base prepared as part of the Local Plan process, to ensure each local authority area achieves sustainable development to support positive economic growth.

Gatwick Diamond:

In addition, the Gatwick Diamond Authorities jointly prepared and signed a Memorandum of Understanding (published March 2012), which formalised the framework for cooperation between the (then) eight 'Gatwick Diamond' local authorities with respect to strategic planning and development

issues, it sets out the way in which the authorities consult one another and work together on matters which affect more than one local authority area.

Both Crawley Borough Council and Mid Sussex District Council are also among the authorities who have adopted the Gatwick Diamond Local Strategic Statement. This document provides a strategic level context and direction across the economic sub-region, and clarifies the roles of the places which make up the Gatwick Diamond area to achieve the wider Gatwick Diamond vision: "by 2016 the Gatwick Diamond will be a world-class, internationally recognised business location achieving sustainable prosperity". The Statement recognises the need to deliver sufficient housing to support the growth of the Gatwick Diamond economy in accordance with the Gatwick Diamond vision.

Housing Market Area:

Crawley Borough Council considers that the Mid Sussex District Plan has been prepared in a positive manner by identifying a housing target of 530 new homes per year (paragraph 3.8); a figure which exceeds the district's demographic housing needs, and one which seeks to achieve realistic economic growth over the Plan period to 2031, in accordance with the requirements of the NPPF.

Paragraph 47 of the NPPF states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (HMA). Further, paragraph 182 of the NPPF requires that Plans are prepared on the basis of a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities as a test of being positively prepared and this forms one of the tests of soundness upon which the Plan will be examined.

Crawley Borough Council acknowledges the positive joint working that has been carried out during the preparation of the Mid Sussex District Plan across the Gatwick Diamond and locally across the North West Sussex Housing Market Area. Crawley Borough Council welcomes the timely progression of the joint Position Statement between the three North West Sussex Authorities (Crawley Borough Council, Horsham District Council and Mid Sussex District Council). This will provide the clarity of the issues the Housing Market Area is facing, and demonstrate that the planned housing figure of 530 homes per annum within Mid Sussex over the Plan period, provides for internally-generated natural change and some continuing net in-migration to the district, principally from the main towns within the Northern West Sussex HMA.

To clarify this further, it is considered that the District Plan should recognise the manner in which the housing market functions in Mid Sussex, in particular the existence of the Northern West Sussex Sub-Regional Housing Market Area, which was identified as the key housing market area extending across northern West Sussex, centred around Crawley and including the main towns within Mid Sussex and Horsham and Horley within Reigate and Banstead.

A suggested minor amendment could be to include recognition within the supplementary text in relation to Meeting Local Housing Need (paragraphs 3.8 – 3.13) and the Location and Delivery of Housing Development which supports DP5 – Housing:

- Firstly, the existence of the Northern West Sussex Housing Market Area; and
- Secondly, that the planned housing figure of 530 homes per annum over the Plan period, provides for internally-generated natural change and some continuing net in-migration to the district, principally from the main towns within the Northern West Sussex HMA.

This would help make the Plan more explicit in terms of which Housing Market its additional homes are serving, although Crawley Borough Council accept this is not a matter of soundness as it is accepted that (as long as the Position Statement is agreed) that the technical work already demonstrates this case.

The Northern West Sussex Sub-Regional Housing Market Area has been identified as the key housing market area extending across northern West Sussex, centred around Crawley and including the main towns within Mid Sussex and Horsham, and Horley within Reigate and Banstead. Whilst there is some overlap between housing market areas, it is clear from the Joint Northern West Sussex Strategic Housing Market Assessment (2009) and its update (October 2012) that the Northern West Sussex Housing Market Area is distinct from the Coastal West Sussex HMA both in terms of primacy of migration within the HMAs and commuting patterns.

However, neighbouring authorities within the adjoining housing market areas, particularly those in the Coastal Sussex Housing Market Area, have expressed concerns regarding their own constraints and emerging housing needs (see attached formal request from Brighton and Hove Council which was received by Crawley Borough Council on 24 September 2012).

Crawley's Current Position:

Crawley Borough Council recently published its preferred strategy Local Plan for public consultation, extracts attached. This document confirms that an independent study into locally generated housing needs identified levels of housing need for the borough ranging from 428-664 dwellings per annum (based on the demographic scenarios). The preferred strategy document suggests the figure of 542 dwellings per annum (demographic 'natural change') is its objectively assessed housing need (see pages 34-36 of the attached Crawley Locally Generated Housing Need Study, NLP, 2011) The economic scenarios fall below those for demographic change (from 120 – 400 dwellings per annum), indicating that any population growth above this level would have to be supported by employment outside of Crawley Borough.

In light of Crawley's tight administrative boundaries, Gatwick Airport 'safeguarded' land and physical constraints such as aircraft noise contours, flooding, nature conservation constraints and limited infill opportunities due to the age and nature of the new town, there is very limited land within the borough for accommodating further development. The preferred strategy therefore indicated a supply-led housing requirement figure for the borough should be set at approximately 340 dwellings per annum (3,543 net new dwellings over the Plan period).

Crawley Borough Council is currently consulting on a number of further sites following further evidence base work in relation to its open spaces. This may have a limited effect on the overall supply-led figure, but is not likely to be significant over the Plan period. The final additional contribution on housing number potentially achieved by these sites may be between 30 and 400 additional dwellings; this reflects the difficulties in confirming these sites are suitable, developable and deliverable. Concerns relating to these sites, and which are currently being assessed, include viability, traffic, air quality studies and loss of playing fields possibly contrary to Sport England and NPPF policies. In addition, viability work is being undertaken in relation to increasing the capacity of the town centre, particularly for the latter part of the Plan.

However, it is clear that there will remain a significant gap between the shortfall in the objectively assessed housing need and the capacity of Crawley to meet this within its borough boundaries. This position was historically acknowledged in the South East Plan which accepted Crawley would not be able to meet its demographic need and spread the required housing throughout the housing market area.

Neighbourhood Plans:

Crawley Borough Council welcomes the progress being made on the 19 Neighbourhood Plans, particularly those which have been published for consultation. The importance of these documents in delivering the residual 2,000 homes required to meet the identified housing target set out in DP5 is recognised, and the success of this process relies on the remaining parish and town councils ensuring the homes are planned for, through their emerging Neighbourhood Plans, with sufficient sites identified to meet this requirement.

The reference in the supplementary text (paragraph 3.21, and second paragraph under Policy DP5) and commitment in the Mid Sussex Local Development Scheme to bringing forward a Site Allocations Development Plan Document if housing delivery through the 19 Neighbourhood Plans does not come forward as anticipated is supported.

Conclusion:

As the NPPF's priority is for such objectively assessed needs to be met within housing market areas (where consistent with the other policies in the Framework), the work carried out between the three Northern West Sussex Authorities is considered critical, and the Mid Sussex District Plan housing requirement figure above its own internally generated demographic need, to meet the wider needs of the Housing Market Area and promote its own economic growth, is supported. At a Gatwick Diamond level it is recognised that, across the Diamond area, local authorities will seek to ensure sufficient housing to meet the needs of those who live and work in the area. This is translated into the joint working within the Northern West Sussex housing market area and the emerging position statement. As the relationship between the authorities within the housing market area is not specified within the Plan itself, the Borough Council's support for the approach is given on the basis of the emerging joint position statement and the assumption that it will be agreed.

Notwithstanding the current gaps in information within the draft emerging Position Statement, Crawley Borough Council supports the Mid Sussex approach of providing housing to meet the aspirations of a growing economy; as referred to above, Crawley's demographic projections exceed the population needed to meet our economic requirements, and therefore residents will have to move out of Crawley for

work as well as housing. It is therefore, recognised and supported that Mid Sussex will be offering this positive opportunity within the same Housing Market Area.

Crawley Borough Council strongly urges Mid Sussex District Council to continue to commit to the ongoing joint working with Crawley Borough and Horsham District Councils in relation to the strategic issues across the housing market area. In particular, it is critical that the joint position statement offers the clear understanding of how the housing market area will accommodate Crawley's own emerging needs in line with the requirement set out in paragraphs 47 and 182 of the NPPF and how this distribution will constitute sustainable development and meet the requirements of positive, economic growth. This is particularly important in light of the known housing need pressures from other authorities adjoining the Housing Market Area.

Crawley Borough Council therefore supports the Mid Sussex District Plan on the basis of this continuing joint work and the final agreed Position Statement.

6b) Please give details of why you consider the Mid Sussex District Plan is not legally compliant or is unsound. Please be as precise as possible

7) Please set out what change(s) you consider necessary to make the Mid Sussex District Plan legally compliant or sound, having regard to the reason you have identified at Q5 above where this relates to soundness

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A suggested minor amendment could be to include recognition within the supplementary text in relation to Meeting Local Housing Need (paragraphs 3.8 – 3.13) and the Location and Delivery of Housing Development which supports DP5 – Housing:

- Firstly, the existence of the Northern West Sussex Housing Market Area; and
- Secondly, that the planned housing figure of 530 homes per annum over the Plan period, provides for internally-generated natural change and some continuing net in-migration to the district, principally from the main towns within the Northern West Sussex HMA.

This would help make the Plan more explicit in terms of which Housing Market its additional homes are serving, although Crawley Borough Council accept this is not a matter of soundness as it is accepted that (as long as the Position Statement is agreed) that the technical work already demonstrates this case.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

Part B (cont) - Examination

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8) If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination?

Yes, I wish to participate at the oral examination

9) If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Crawley Borough Council would like to request a place at table to support MSDC and explain housing numbers across HMA.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10) Please notify me when:

(i) The Plan has been submitted for Examination

(ii) The publication of the recommendations from the Examination

(iii) The District Plan is adopted

3. Effective

4. Consistent with national policy

6a) If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected 'unsound' for any of these tests please also complete question 6b

Crawley Borough Council supports the Mid Sussex District Council District Plan, subject to agreement being reached on the position statement and clear outcomes achieved through the ongoing joint working.

This representation provides a detailed explanation of Crawley Borough Council's understanding of the strategic context and the way in which this influences the scope of the Mid Sussex District Plan.

Duty to Cooperate:

Crawley Borough Council confirms that it considers the Mid Sussex District Plan to be both legally compliant and 'sound' in relation to meeting the Duty to Cooperate.

Joint working across the two local authority areas pre-dates its formalisation through the Gatwick Diamond Initiative and the statutory duty to cooperate imposed by the Localism Act 2011. Critically, this representation has been prepared in the context of continual joint working between Crawley Borough Council and Mid Sussex District Council, including, following a history of joint working as neighbouring authorities, the commissioning of joint strategic evidence base as part of the three Northern West Sussex Authorities and the ongoing joint working as part of the Gatwick Diamond, including the adoption of the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement.

The representation is made on the basis of the emerging joint Position Statement between Crawley Borough Council, Horsham District Council and Mid Sussex District Council and the assumption that this will be agreed before the District Plan examination hearings.

A number of strategic evidence base documents have been recently prepared to support the preparation of the individual authorities' Local Plans; these were jointly commissioned by Crawley Borough Council, Horsham District Council and Mid Sussex District Council, and include:

- Joint Northern West Sussex Strategic Housing Market Assessment (2009)
- Joint Northern West Sussex Economic Appraisal and Employment Land Review (2009/2010)
- At Crawley Study (2009)
- New Market Town Study (2010)
- Joint Northern West Sussex Strategic Housing Market Assessment Update (2012)
- Joint Northern West Sussex Economic Growth Assessment (pending)

The outcomes of the housing studies and the emerging new evidence in relation to the economic growth agenda will form the basis for the position statement. The Position Statement is expected to show how the housing market area is intending to meet its objectively assessed housing and economic needs, as far as is consistent with the policies set out in the NPPF and the local evidence base prepared as part of the Local Plan process, to ensure each local authority area achieves sustainable development to support positive economic growth.

Gatwick Diamond:

In addition, the Gatwick Diamond Authorities jointly prepared and signed a Memorandum of Understanding (published March 2012), which formalised the framework for cooperation between the (then) eight 'Gatwick Diamond' local authorities with respect to strategic planning and development issues. It sets out the way in which the authorities consult one another and work together on matters which affect more than one local authority area.

Both Crawley Borough Council and Mid Sussex District Council are also among the authorities who have

adopted the Gatwick Diamond Local Strategic Statement. This document provides a strategic level context and direction across the economic sub-region, and clarifies the roles of the places which make up the Gatwick Diamond area to achieve the wider Gatwick Diamond vision: "by 2016 the Gatwick Diamond will be a world-class, internationally recognised business location achieving sustainable prosperity".

Economic Growth:

All existing and proposed evidence base studies, commissioned by the Local Authorities (Crawley Borough Council, Mid Sussex District Council and Horsham District Council) within the context of cooperation and positive strategic planning, highlight the relationship and interdependencies that occur across the wider area, formally understood to be the Gatwick Diamond, and which includes Crawley Borough, Horsham District and Mid Sussex District (as well as the adjoining authorities to the north in Surrey). This is demonstrated by the travel to work area with commuting between the areas being a fundamental component in the Northern West Sussex Housing Market Area.

The Gatwick Diamond Local Strategic Statement (LSS) highlights Crawley/Gatwick as the primary business location in the sub-region for economic growth, and this location is expected to be the focus for future economic development. However, it is also clarified in the LSS that this does not mean that business development in other locations is precluded. In general, it is expected to reflect the particular attributes of the smaller settlements and support local communities rather than providing strategic employment growth.

It is understood that the jobs target of 7,600 jobs, set out in the Mid Sussex District Plan relates to the 3% anticipated growth identified by the Northern West Sussex Employment Land Review and closely relates to the housing figure of 10,600 new homes over the 20 year period.

Notwithstanding the current gaps in information within the draft emerging evidence base, and therefore the joint Position Statement, Crawley Borough Council supports the Mid Sussex approach of providing housing to meet the aspirations of a growing economy. As set out in Crawley Borough Council's representation in relation to the proposed Housing policies to the submission District Plan: Crawley's demographic projections exceed the population needed to meet our economic requirements, and therefore residents will have to move out of Crawley for work as well as housing. It is therefore, recognised and supported that Mid Sussex will be offering this positive opportunity within the same Housing Market Area. It is also noted that the interrelationship between Crawley and Mid Sussex depends on residents in Mid Sussex commuting in to Crawley/Gatwick, providing vital employment that underpins the economy of both Crawley and Mid Sussex.

An Economic Growth Assessment has been commissioned jointly by Crawley Borough Council, Horsham District Council and Mid Sussex District Council, to update the economic position across the Northern West Sussex area in light of the recent changes to national planning policy and legislation. This will provide an up-to-date understanding of the nature and amount of employment provision required, and the interactions and relationships of economic development across and between the three authority areas. The study is expected to illustrate that Crawley is still the economic driver in the wider area and that land availability with the tri-authority area must address how best the land can be allocated and provided to accommodate increased economic growth in the area.

The council welcomes the opportunity to discuss this further following the results of the Economic Growth Assessment.

Conclusion:

Therefore, Crawley Borough Council supports Policy DP2, subject to clarification and agreement that the relationship between Mid Sussex District and Crawley Borough, in the wider sub-regional economic area, is critically interrelated.

Crawley Borough Council strongly urges Mid Sussex District Council to continue to commit to the ongoing joint working with Crawley Borough and Horsham District Councils in relation to the strategic issues across the economic sub-region.

Crawley Borough Council supports the Mid Sussex District Plan on the basis of this continuing joint work, particularly through the emerging Economic Growth Assessment and the final agreed Position Statement.

Part B (cont) - Examination

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8) If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination?

Yes, I wish to participate at the oral examination

9) If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Crawley Borough Council would like to request a place at table to support MSDC and explain the interrelationship between and across the strategic economic area.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10) Please notify me when:

(i) The Plan has been submitted for Examination

(ii) The publication of the recommendations from the Examination

(iii) The District Plan is adopted

Strategic Housing & Planning Services

Contact: Elizabeth Brigden Date: 16 January 2015
Direct Line: 01293 438624 Email: elizabeth.brigden@ Crawley.gov.uk



Director: Lee Harris
Chief Executive's Directorate

Dear Claire Tester,

MID SUSSEX DISTRICT PLAN 2014 – 2031 CONSULTATION DRAFT

Crawley Borough Council welcomes the opportunity to provide comments on the Regulation 18 consultation draft of the emerging Mid Sussex District Plan 2014 – 2031. These comments have been made at an officer level with the endorsement of the Cabinet Member for Planning and Economic Development.

Crawley Borough Council supports the progress being made on the Mid Sussex District Council's District Plan, and the ongoing joint working which has included Crawley Borough Council throughout the Plan-making process.

This letter is written in the context of this continual joint working which has been formalised in an agreed Position Statement between the three Northern West Sussex Authorities¹ (updated in July 2014, and anticipated for further updating prior to Crawley Borough Council's Local Plan Examination hearing sessions) and through the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement (2012).

Crawley Borough Council, therefore, welcomes the positive references throughout the consultation draft District Plan in relation to the wider economic context within which Mid Sussex district lies and the Plan has been prepared, and the confirmation that the Plan has been informed by the discussions the District Council has had with neighbouring authorities regarding needs and planning issues of cross-boundary importance.

Crawley Borough Council is pleased to note the joint evidence base undertaken across northern West Sussex has directly influenced the strategy and policies in the Plan, and in particular the acknowledgment of the strong housing and economic links between the three authority areas and the role Mid Sussex can play in the future economic prosperity for the area and in helping address housing needs.

Crawley's Current Position

Through the continual joint work as part of the Gatwick Diamond, northern West Sussex Authorities and as adjoining authorities, I am confident that Mid Sussex District Council is very familiar with Crawley's high objectively assessed development needs and substantial constraints. The total unmet need, assessed against the objectively assessed needs for both housing and employment, arising over the Plan period (2015 – 2030), as set out in Crawley's submitted Local Plan², is:

- Housing: 3,120 dwellings
- Employment: 35ha of land for B Use Classes.

¹ Crawley Borough Council, Horsham District Council and Mid Sussex District Council

² Crawley 2030, The Crawley Borough Local Plan 2015 – 2030; Submission Modifications Draft November 2014

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 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; and undertaking additional public consultation, technical and viability studies on the potential of additional sites.

Housing

Crawley's Local Plan (submitted for Examination on 26 November 2014) confirms that the supply-led capacity figure over the 15 year Plan period to 2030 for Crawley is a minimum of 5,000 net dwellings. This is against a current objectively assessed housing need equal to 8,100 dwellings over the same Plan period.

Crawley Borough Council is in the process of commissioning an update into the Objectively Assessed Needs for the borough, which will incorporate the requirements of the Planning Practice Guidance and may include the updated DCLG household projections should they be released in advance of the Local Plan's examination hearings.

Employment

In addition to the unmet housing needs, joint working undertaken across northern West Sussex, through the joint commissioning of the Economic Growth Assessment (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, particularly the continued uncertainty in relation to a potential second runway at Gatwick Airport and the requirement to safeguard a large area of land in the north of the borough, Crawley is currently anticipating a shortfall of 35ha of employment land for B Use Classes, against an objectively assessed need of 77ha, as emerged from the EGA.

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, and complementary to the approach promoted by the Coast to Capital Local Enterprise Partnership's Strategic Economic Plan.

Crawley Borough Council is keen to explore the scale, location and detail of both the science park and employment site (Policy DP8) and how they might help meet the economic needs of the wider economic sub-region. The council would welcome the opportunity to continue to work with Mid Sussex District Council in regard to strategic allocations that support the economic growth of the Gatwick Diamond.

Conclusions

Crawley Borough Council draws Mid Sussex District Council's attention to Topic Paper 5: Unmet Needs (November 2014) which has been prepared to support the submission Local Plan, and which set out the position in relation to unmet needs and strategic development locations at that point.

The Inspector's Initial Findings into the Horsham District Planning Framework (19 December 2014) may also be of interest, paragraph 13 of this confirms that "Depending on the position of other Councils, particularly Mid Sussex, up to 100 dpa could be considered an appropriate allowance for the needs of Crawley".

Crawley Borough Council is supportive of the approach being taken by Mid Sussex District Council that the final housing number to be included in the pre-submission of the Plan will be informed by the current ongoing work on the housing land supply and an assessment of the unmet development needs of neighbouring authorities. Crawley Borough Council thanks Mid

Sussex District Council for ensuring Crawley's involvement in the work which has already been undertaken and remains available to continue its support in the work outstanding.

I trust this information is of assistance to you, in terms of setting out the key messages which you will already be familiar with. Please contact 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 the challenging strategic issues.

Yours sincerely,

A handwritten signature in black ink that reads "Diana Maughan". The signature is written in a cursive style with a large initial 'D'.

Diana Maughan
Head of Strategic Housing and Planning Services

3. Horsham District Planning Framework

Contact: Elizabeth Brigden

Date: 5 April, 2012

Direct Line: 01293 438624

Email: elizabeth.brigden@crawley.gov.uk

Peter Browning
Environment and Housing Directorate

Head of Planning Policy
Horsham District Council
West Sussex

CONSULTATION RESPONSE – HORSHAM DISTRICT PLANNING FRAMEWORK

Dear Sir/Madam

Thank you for providing Crawley Borough Council with the opportunity to comment on the Horsham District Planning Framework Consultation. This response is submitted at an officer level, but has been endorsed by the Council's Cabinet Member for Planning and Economic Development.

We welcome the positive approach which Horsham District Council has been taking towards strategic issues, such as housing, which cross local authority boundaries. We are pleased to note that, along with other local authorities, including Crawley, the District Council has approved the Local Strategic Statement for the 'Gatwick Diamond' area and signalled its commitment to further joint work on these strategic issues. We believe that, through a spirit of cooperation and joint working, it should be possible to maintain a broad but consistent approach towards strategic planning and development issues whilst respecting the discretion of the individual authorities to determine the future planning of their areas.

Against this background, we support the approach of consulting on the four housing levels set out in the consultation document and would like to make the following comments.

The Local Strategic Statement indicates that the Local Authorities will 'seek to secure sufficient housing... to meet the needs of those who live or work in the area, including needs arising from a repositioned Gatwick Diamond economy'. We are currently doing all we can to maximise the potential for meeting housing needs within its own boundaries – including reviewing every possible option by undertaking further critical urban capacity study assessments and reassessing site capacity yields. However, it is becoming clear, through early evidence, that we will be unable to achieve a supply which can satisfy the baseline figure identified through the Locally Generated Housing Needs Assessment for meeting its demographic growth (circa. 540 dwellings per annum). This is due to the very real and practical constraints to physical capacity within Crawley – including noise contours, limited opportunities for infill development and tight administrative boundaries.

We would therefore like to work with our neighbouring authorities to see how these demographic needs might be addressed in the context of the wider Gatwick Diamond area and to establish if there are any solutions which can be agreed as acceptable. This strategic discussion, as far as possible, should take place during the preparation of the respective Development Plans for each of the Local Authorities, rather than on a piecemeal basis. In this context, we fully support partnership working carried out so far to produce the Gatwick Diamond Local Strategic Statement and Memorandum of Understanding. It is important that this positive partnership working is continued in practice to demonstrate evidence of successful cooperation in planning for strategic priorities.

All four of the options put forward for consultation, involve housing provision at above the rate needed to meet natural demographic change in Horsham's resident population and to this extent all could contribute at a wider strategic level to ensuring that the demographic needs of the Gatwick

Diamond area are met. However, the two lower options would not appear to address the need for housing to support a growing local economy. In light of this, there is a concern it may be difficult currently to justify either of these two lower housing figures suggested as part of this consultation.

The opportunities that Options 3 and 4 offer in relation to supporting the long term strategic direction set out in the Local Strategic Statement which includes commitments to the economic as well as the demographic needs of the area, are welcomed, although the Borough Council recognises that, as levels of housing provision increase, the potential impacts of new development on the character of local settlements will become an increasing concern and will have to be taken into account.

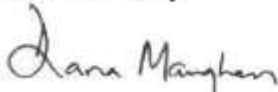
In conclusion, we would wish to emphasise that it is important for all authorities within the Gatwick Diamond to work together to establish housing figures for each local authority area which seek to meet the overall demographic and economic needs of the area recognising the functional dependencies across planning authority boundaries. Therefore, it is strongly considered that this issue is not restricted to the administrative boundaries of either Horsham or Crawley Councils, and that all authorities within the Gatwick Diamond must work positively to meet the needs of the area as a whole.

We would like to take this opportunity to stress that we are not recommending or seeking a top-down "Gatwick Diamond" housing figure in the same way as the South East Plan intended, but seeking to secure mutual agreement on strategic housing issues building on evidence undertaken at the local level within each authority area and reflecting the aspirations of local communities.

With this in mind, we wish continued engagement with Horsham District Council and neighbouring authorities in the interests of sustainable development and use of land which would have a significant impact across local authorities' boundaries.

If you have any queries regarding the Council's response, please do not hesitate to contact Elizabeth Brigden, Forward Planning Manager.

Yours sincerely



Diana Maughan
Head of Strategic Housing and Planning Services

DEVELOPMENT AND RESOURCES DIRECTORATE

Contact: Elizabeth Brigden
Direct line: 01293 438624

Email: elizabeth.brigden@ Crawley .gov.uk
Date: 17 October 2013



David Covill, Director
Development and Resources Directorate

Head of Planning Policy
Strategic Planning
Horsham District Council
Park North, North Street
Horsham
West Sussex, RH12 1RL

Dear Sir/Madam,

Thank you for providing Crawley Borough Council with the opportunity to comment on the Horsham District Planning Framework Preferred Strategy. This response is submitted at an officer level, but has been endorsed by the council's Cabinet Member for Planning and Economic Development.

The District Council's commitment to delivering a properly considered strategy is supported and we welcome the positive approach which Horsham District Council has been taking towards strategic issues, such as housing and economic development which cross local authority boundaries. We are pleased to note that, in addition to continuing the joint working arrangements as Gatwick Diamond Authorities, the District Council has signed a Position Statement alongside Crawley Borough Council and Mid Sussex District Council, establishing the current position in relation to key strategic issues jointly affecting the three Northern West Sussex authority areas and committing the three Authorities to furthering this work.

Housing

The Northern West Sussex Authorities Position Statement commits the three authorities to collectively meet the objectively assessed housing needs of the housing market area insofar as is reasonable taking account of local constraints, local aspirations and the need for sustainable development. Based on the information provided in paragraph 6.1, it is noted that the proposed figure of 575 new homes per year within Horsham District, exceeds the number of homes required to meet the needs arising from the existing population (190), and economic growth (560), with the express understanding this will support the wider economy of the Gatwick Diamond. This approach is strongly supported by Crawley Borough Council.

Draft Policy 13

The focus for strategic development on the two existing strategic sites at West of Horsham and Kilnwood Vale, and for a new strategic development to the north of Horsham, in line with the proposed Plan's development hierarchy to delivery sustainable development is supported.

Reference to West of Ifield as an alternative strategic development option that has been discounted at this stage is noted and the approach set out by the preferred strategy is supported. Crawley Borough Council has previously expressed objection to the development of West of Ifield. The council's position remains in line with the concerns raised previously about the lack of infrastructure capacity, increased traffic and the impact on the environment.



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These concerns are generally reflected by the Horsham District Planning Framework Interim Sustainability Appraisal; although Crawley Borough Council takes this opportunity to confirm that the current draft Infrastructure Plan for Crawley also raises concerns in relation to secondary school capacity for significant new development impacting on the existing provision. New evidence has not been provided by the developer consortium for either council to be able to consider whether development in this location would be the most sustainable approach to meeting housing needs. Crawley Borough Council seeks the opportunity to work closely with Horsham District Council to consider any new information relating to proposals in this location should it emerge through the Horsham Planning Framework process.

Economic Growth

Crawley Borough Council supports the Horsham District Planning Framework's positive approach to economic growth. It is anticipated that the level of employment floorspace to be delivered during the Plan period will be informed by the joint Economic Growth Assessment (EGA) evidence study being carried out on behalf of the three Northern West Sussex authorities.

In line with the Northern West Sussex Position Statement, Crawley Borough Council continues to support the positive joint working on employment and economic development as the authorities progress with their Plans and economic development strategies to reflect the particular needs of the individual local authority areas and the wider Gatwick Diamond.

Retail

Crawley Borough Council continues to support the sustainable growth of Horsham's retail offer in a manner that complements Crawley's recognised role as the major retail centre within the Gatwick Diamond.

Draft Policy 5

Crawley Borough Council supports the enhancement of Broadbridge Heath as an out-of-town retail location, subject to confirmation through detailed evidence that this will not cause significant negative impact on the vitality and viability of other centres, as existing or planned, within the retail catchment. Any impact on Crawley's Town Centre aspirations should be demonstrated.

Gypsy and Traveller Accommodation

Crawley Borough Council supports the proposals within the preferred strategy for meeting the existing and future Gypsy and Traveller needs arising within the District.

Gatwick Airport

Crawley Borough Council suggests that it would be helpful for the Horsham District Planning Framework to identify on the Local Plan Map the area currently safeguarded for a potential second runway at Gatwick which lies to the west of Crawley's boundary.



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If you have any queries please do not hesitate to contact me using the details at the top of this letter.

Kind regards,

A handwritten signature in black ink, appearing to read "E. Brigden", written in a cursive style.

Elizabeth Brigden
Planning Policy Manager

Strategic Housing & Planning Services

Contact: Elizabeth Brigden Date: 26 June 2014
Direct Line: 01293 438624 Email: elizabeth.brigden@ Crawley.gov.uk



Director: David Covill
Development & Resources Directorate

Dear Cllr. Vickers,

I write in response to your request for confirmation regarding whether and to what extent Crawley Borough Council requires assistance to meet its identified needs and in what role I consider Horsham District can assist.

In light of Crawley's tight administrative boundaries, Gatwick Airport 'safeguarded' land and physical constraints such as aircraft noise contours, flooding, nature conservation constraints and limited 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 over the Plan period (2015 – 2030) is:

- Housing: 3,125 dwellings
- Employment: 35ha of land for B Use Classes

As you are aware our two Authorities have a long history of positive joint working and this has resulted already in practical outcomes in the delivery of housing to meet the needs of the northern West Sussex Housing Market, including unmet housing needs arising from Crawley. This letter is written in the context of this continual joint working which it is anticipated will be formalised in an agreed updated Position Statement for the three northern West Sussex Authorities (Crawley, Horsham and Mid Sussex).

Housing

Through the continual joint work as part of the Gatwick Diamond, northern West Sussex Authorities and as adjoining authorities, I am confident that Horsham District Council is very familiar with Crawley's high objectively assessed housing need and substantial constraints. These have clearly been expressed throughout the preparation of the Horsham District Planning Framework (Crawley's response to 'How much housing does Horsham District need?' consultation, dated 5 April 2012, the northern West Sussex Position Statement published for the Mid Sussex Examination, September 2013, and throughout Horsham's Duty to Cooperate workshops – draft final report dated March 2014).

Horsham has repeatedly confirmed its awareness of Crawley's unmet housing need through the various stages of preparation of Crawley's own Local Plan (anticipated for publication consultation in autumn 2014), acknowledging it in response to Crawley's Issues and Options consultation (February 2012), consultation on the preferred strategy (December 2012) and additional sites consultation (July 2013).

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 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; and undertaking additional public consultation, technical and viability studies on the potential of additional sites. This work has

ensured the total supply of land for housing within the borough has been increased by a capacity of 1,150 net dwellings*.

Crawley's draft submission Local Plan confirms that the supply-led capacity figure over the 15 year Plan period to 2030 for Crawley is a minimum of 4,950 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 3,075 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 this level of unmet housing needs 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 emerging Local Plans. 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 is unable to be met within the borough's administrative boundaries.

Crawley's unmet housing needs also result in an associated level of unmet affordable housing needs which will continue to remain unmet unless agreement is reached between authorities to address this concern alongside that for market housing.

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 (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, within which Horsham town also falls. The draft 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, and 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 draft 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 Horsham and neighbouring authorities to scope locations for accommodating unmet economic needs.

I trust this information is of assistance to you, in terms of setting out the key messages which you will already be familiar with. Please contact me or my officer, Elizabeth Brigden, should you have any questions or require further clarification with any of the content included above.

* from 3,800 dwellings in the preferred strategy Crawley Local Plan (October 2012) to 4,950 dwellings in the draft submission Crawley Local Plan (July 2014)

I look forward to continuing to work with you in the future to seek positive solutions to the 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 Council Formal Representation to the Horsham District Planning Framework

Paragraph 3.15 & General

Crawley Borough Council supports the Horsham District Planning Framework proposed submission (May 2014), subject to agreement being reached on the updated position statement and clear outcomes achieved through the ongoing joint working.

This representation provides a detailed explanation of Crawley Borough Council's understanding of the strategic context and the way in which this influences the scope of the Horsham District Planning Framework.

Duty to Cooperate:

Crawley Borough Council confirms that it considers the Horsham District Planning Framework to be both legally compliant and 'sound' in relation to meeting the Duty to Cooperate.

Joint working across the two local authority areas pre-dates its formalisation through the Gatwick Diamond Initiative and the statutory duty to cooperate imposed by the Localism Act 2011. Critically, this representation has been prepared in the context of:

- continual joint working as neighbouring authorities;
- the delivery of 2,500 new homes in a new neighbourhood adjacent to Crawley through the **West of Bewbush Joint Area Action Plan** (2009), prepared and adopted jointly by both authorities;
- the commissioning of joint strategic evidence, in conjunction with Mid Sussex District Council as part of the Northern West Sussex Authorities; and
- the ongoing joint working as part of the Gatwick Diamond, including the adoption of the **Gatwick Diamond Memorandum of Understanding** and **Local Strategic Statement**.

The representation is made on the basis of the signed **joint position statement** between Crawley Borough Council, Horsham District Council and Mid Sussex District Council (September, 2012), and the assumption that an updated position will be agreed before the District Planning Framework examination hearings.

A number of strategic evidence base documents have recently been prepared to support the preparation of the individual authorities' Local Plans; these were jointly commissioned by Crawley Borough Council, Horsham District Council and Mid Sussex District Council, and include:

- Joint Northern West Sussex Strategic Housing Market Assessment focused update (pending)
- Joint Northern West Sussex Strategic Housing Land Availability Assessment – strategic sites (pending, prepared jointly 'in-house')
- Joint Northern West Sussex Economic Growth Assessment (2014)
- Joint Northern West Sussex Housing Market Assessment update (2012)
- New Market Town Study (2010)
- At Crawley Study (2009)
- Joint Northern West Sussex Economic Appraisal and Employment Land Review (2009/2010)
- Joint Northern West Sussex Strategic Housing Market Assessment (2009)

The outcomes of the housing and employment studies form the basis for the updated Position Statement. The 2013 Position Statement shows how the northern West Sussex Authorities intend to meet their objectively assessed housing and economic needs, as far as is consistent with the policies set out in the NPPF and the local

evidence base prepared as part of the Local Plan process, to ensure each local authority achieves sustainable development to support positive economic growth.

The updated position statement will be informed by the most recent and emerging evidence in relation to housing delivery and the economic growth agenda.

In addition, the Gatwick Diamond Authorities jointly prepared and signed a Memorandum of Understanding (published March 2012), which formalised the framework for cooperation between the (then) eight 'Gatwick Diamond' local authorities with respect to strategic planning and development issues. It sets out the way in which the authorities consult one another and work together on matters which affect more than one local authority area.

Both Crawley Borough Council and Horsham District Council are among the authorities who have adopted the Gatwick Diamond Local Strategic Statement. This document provides a strategic level context and direction across the economic sub-region, and clarifies the roles of the places which make up the Gatwick Diamond area to achieve the wider Gatwick Diamond vision: "by 2016 the Gatwick Diamond will be a world-class, internationally recognised business location achieving sustainable prosperity". The statement recognises the need to deliver sufficient housing to support the growth of the Gatwick Diamond economy in accordance with the Gatwick Diamond vision.

General Housing:

Crawley Borough Council is currently preparing its new Local Plan with publication consultation on a submission draft document anticipated in September 2014. The Crawley Local Plan is based on substantial technical evidence studies, including those in relation to housing needs and housing supply. The position for the Local Plan is based on an evolving picture as the national population and household projections have been updated and as local land supply and viability has changed within the borough over the years leading up to the submission version of the Plan.

Crawley's draft submission Local Plan confirms that Crawley has an objectively assessed housing need of 535 dwellings per annum (totalling a need of 8,025 net new dwellings over the 15 year Plan period).

In light of Crawley's tight administrative boundaries, Gatwick Airport 'safeguarded' land and physical constraints such as aircraft noise contours, flooding, nature conservation constraints and limited 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 draft submission Local Plan, therefore, indicates a supply-led housing requirement figure for the borough of a minimum of 4,950 dwellings over the 15 year Plan period to 2030; offering an annualised average of 330 dwellings per annum. This figure takes into account further work which has sought to maximise the extent to which needs arising from Crawley can be accommodated within the borough's boundaries. This has included 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; and undertaking additional public consultation, technical and viability studies on the potential of additional sites. This work has ensured the total supply of land for housing within the borough has been increased by a capacity of 1,150 net dwellings*.

* from 3,800 dwellings in the preferred strategy Crawley Local Plan (October 2012) to 4,950 dwellings in the draft submission Crawley Local Plan (July 2014)

It is clear, therefore, that there will remain a significant gap, of about 3,075 dwellings over the Plan Period, between the shortfall in the objectively assessed housing need and the capacity of Crawley to meet this within its borough boundaries. This position was historically acknowledged in the South East Plan which accepted Crawley would not be able to meet its demographic need and spread the required housing throughout the housing market area.

The northern West Sussex sub-regional Housing Market Area (HMA) has been identified as the key housing market area extending across northern West Sussex, centred around Crawley and including the main towns within Horsham and Mid Sussex, and Horley within Reigate and Banstead. Whilst there is some overlap between housing market areas, it is clear from the Joint Northern West Sussex Housing Market Assessment (2009) and its update (2012) that the northern West Sussex HMA is distinct from the Coastal West Sussex HMA both in terms of primacy of migration and commuting patterns.

Crawley acknowledges the positive joint working that has been carried out during the preparation of the Horsham District Planning Framework across the Gatwick Diamond and locally across the northern West Sussex Housing Market Area. In September 2012 the northern West Sussex Authorities' Position Statement was signed, setting out the agreed position, at that time, between the three authorities. This set out the combined housing need figures for the three main administrative areas within the Housing Market Area alongside the combined intended housing supply figure from each authority's published document.

Crawley welcomes the timely progression of an updated position statement between the three northern West Sussex authorities, and seeks to ensure this is based on updated and comparable objectively assessed housing needs and an agreed strategic sites assessment, including broad locations, across the whole housing market area.

Crawley Borough Council strongly urges Horsham District Council to continue to commit to the ongoing joint working with Crawley Borough and Mid Sussex District Councils in relation to the strategic issues across the housing market area. In particular, it is critical that the updated joint position statement offers the clear understanding of how the housing market area will accommodate Crawley's own emerging needs in line with the requirement set out in paragraphs 47 and 182 of the NPPF and how this distribution will constitute sustainable development and meet the requirements of positive, economic growth. This is particularly important in light of the known housing need pressures from other authorities adjoining the housing market area (including from Coastal West Sussex, Brighton and Hove, East Sussex, Surrey and potentially Greater London).

Crawley Borough Council, therefore, supports the Horsham District Planning Framework on the basis of this continuing joint work and the final updated, agreed Position Statement and strategic sites assessment.

Crawley supports the inclusion of paragraph 6.6 within the Horsham District Planning Framework, as it expressly refers to meeting Crawley's needs ("as far as possible...").

Economic Growth:

All existing evidence base studies, commissioned by the Local Authorities (Crawley Borough Council, Horsham District Council and Mid Sussex District Council) within the context of cooperation and positive strategic planning, highlight the relationship and interdependencies that occur across the wider economic sub-region: known as the Gatwick Diamond area. This is demonstrated by the travel to work area with commuting between the areas being a fundamental component in the northern West Sussex Housing Market Area.

The Gatwick Diamond Local Strategic Statement recognises the role of Crawley/Gatwick at the heart of the Gatwick Diamond, highlighting its function as the primary business location in the sub-region for economic growth, and outlining that the area is expected to be the focus for future economic development. However, it is also clarified in the LSS that this does not mean that business development in other locations is precluded.

An Economic Growth Assessment (EGA) was commissioned jointly by Crawley Borough Council, Horsham District Council and Mid Sussex District Council, to update the economic position across the northern West Sussex area. The EGA identifies future economic growth requirements (in terms of job growth and land take) on an individual and cross-authority basis, recommending how growth can be accommodated through emerging Local Plans. It does not consider policy or growth implications arising from a possible second runway at Gatwick, though is written in the context of the ongoing requirement to safeguard land at the north of Crawley for potential development of a second runway, and has regard to the continued land supply constraint this creates.

The EGA is clear that the economy is recovering, and that the Gatwick Diamond is well placed for economic growth, identifying significant need for additional employment land across the three Local Authority areas. Within a Crawley context it is recognised that there is particular need for B-Class business land, with the EGA identifying baseline demand for an additional 77.2 hectares land to accommodate business growth over the plan period. Given Crawley's constrained land supply position, the draft Submission Crawley Local Plan takes a supply-led approach to identify a total of 42 hectares available land supply, leaving a shortfall of approximately 35 hectares.

For this reason the draft Submission Crawley Local Plan promotes Manor Royal as the premier location for business and business supporting development to ensure that the existing available supply of business land is maximised. It is however recognised that it will be necessary to identify additional land for business use during the plan period, potentially including the identification of a Strategic Employment Location, for which there is identified qualitative and quantitative need. Therefore a sequential approach is applied in the draft Submission Crawley Local Plan, seeking to appraise options respectively (i) within Crawley (subject to certainty on safeguarding), (ii) at Crawley (immediately adjoining the borough), or (iii) near to Crawley/Gatwick within the Heart of the Gatwick Diamond.

With safeguarding representing a fundamental delivery constraint at present, it is recognised that locations at or beyond Crawley's administrative boundary may need to be considered. Should it not be possible to identify location(s) within Crawley, Crawley Borough Council is committed to working alongside Horsham, Mid Sussex, and other adjoining authorities such as Reigate & Banstead Borough Council, to scope the feasibility of identifying land outside Crawley for a Strategic Employment Location, either 'at Crawley/Gatwick immediately adjoining the borough', and if this cannot be achieved, land near to Crawley within the wider Heart of the Gatwick Diamond. This approach has been endorsed and agreed by the three partner authorities (Crawley BC, Horsham DC and Mid Sussex DC) through the Northern West Sussex EGA.

There is a high degree of economic and commercial property market inter-relationship between the three Northern West Sussex local authorities, and planning policy decisions relating to provision of employment land made within any one of the local authorities potentially has a bearing on the locational and growth decisions of businesses across the sub-region and, therefore the scale and distribution of future job growth. The EGA clearly identifies significant economic growth needs for Crawley,

Horsham, and Mid Sussex, and Crawley Borough Council consider the Horsham approach in meeting its identified economic needs to represent positive and sound planning. But it will be vital to continue working positively under Duty to Cooperate to plan positively for sustainable economic growth at the Heart of the Gatwick Diamond. In this context, it is recognised that there may be a requirement for unmet economic needs from Crawley to be accommodated in adjoining authorities (including Horsham District) and it is therefore imperative that the established joint working between Crawley, Horsham and Mid Sussex and other neighbouring authorities are maintained in planning positively for future economic growth within the Gatwick Diamond. This is reflected within the draft submission Crawley Local Plan, which confirms Crawley's commitment to working with neighbouring authorities to address this unmet need in the most appropriate manner and locations.

A handwritten signature in black ink, appearing to read 'Diana Maughan'. The signature is written in a cursive, flowing style.

Diana Maughan

Head of Housing and Planning Strategic Services

APPENDIX C: NORTHERN WEST SUSSEX POSITION STATEMENT – UPDATE FEBRUARY 2015

NORTHERN WEST SUSSEX AUTHORITIES **POSITION STATEMENT (revised February 2015)**

1. Purpose of this Position Statement

- 1.1 The purpose of this statement is to set out how the three authorities have worked together on strategic planning matters in relation to the identified Northern West Sussex housing market area. In doing so, it demonstrates how the three authorities have sought to and continue to address the legal Duty to Co-operate requirements (Localism Act 2011) and tests of the National Planning Policy Framework (NPPF) paragraphs 178-182 (Appendix A and Appendix B). It updates the Position Statement agreed by the three Northern West Sussex Authorities in September 2013 and revised in July 2014.

2. Background

- 2.1 Crawley Borough Council, Horsham District Council and Mid Sussex District Council (the Northern West Sussex Authorities) have a long history of working together on issues of mutual importance and across a wide range of services. For example, the councils have mature shared service arrangements and routinely work together on procurement of goods and services. The three authorities share planning and administrative boundaries. There is a particularly strong history of joint working and collaboration on planning policy matters.
- 2.2 Over the years a number of planning studies have been procured jointly and, when proposals at Crawley involved development beyond the borough boundary, a joint area action plan between Horsham and Crawley was produced. With the introduction of the Localism Act and the Duty to Cooperate, joint working has continued and strengthened with the three authorities collaborating together on a number of strategic issues.
- 2.3 The authorities also work with partners in the wider ‘Gatwick Diamond’¹ area to address strategic planning issues. The aim of this work is to promote the continued prosperity of the Gatwick Diamond and plan for its future growth. As part of this wider area, the three authorities have worked on and signed up to the Gatwick Diamond Local Strategic Statement and the Memorandum of Understanding². This sets out a vision to help ensure that ‘*by 2016 the Gatwick Diamond will be a world-class, internationally recognised business location achieving sustainable prosperity.*’ In doing so, the statement recognises the strength of the Gatwick Diamond as a business location, and has regard to the strong demand to locate there.
- 2.4 More recently, the three authorities became part of the new ‘Coast to Capital’ Local Enterprise Partnership. This area stretches from Chichester in the south west, along

¹ Crawley Borough Council, Epsom and Ewell Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, West Sussex County Council, Surrey County Council and Tandridge District Council

² Which can be accessed from each of the northern West Sussex authorities’ websites:

Crawley -

http://www.crawley.gov.uk/pw/Planning_and_Development/Planning_Policy/GatwickDiamondLocalStrategicStatement/index.htm;

Horsham - <http://www.horsham.gov.uk/planningpolicy/planning-policy/gatwick-diamond>;

Mid Sussex - <http://www.midsussex.gov.uk/8573.htm>.

the coast to Brighton and Newhaven and Seaford through Mid Sussex and Crawley to Croydon on the outskirts of London. The Coast to Capital Local Enterprise Partnership (LEP) has published its Strategic Economic Plan (2014) which aims to encourage growth across the Coast to Capital region as well as supporting its thriving business base. This strategy has the potential to be a significant factor in the way in which resources are prioritised and directed to infrastructure projects. The three authorities are working together with other authorities in the Gatwick Diamond to continue effective input into the LEP. They will be urging the LEP to assist in unlocking stalled housing and employment sites within the LEP area, including within the Gatwick Diamond area and along the Sussex Coast, in order to achieve its aim to be one of the leading economic regions in the UK whilst maintaining its special/high environmental quality which attracts investment to the area.

- 2.5 A Strategic Housing Market Assessment has been produced for the three authority areas since 2009. The assessment initially identified, and subsequent reviews have confirmed that the County had two separate Housing Market Areas. Crawley Borough Council, Horsham District Council and Mid Sussex District Council were identified as sharing a common Housing Market Area, the 'Northern West Sussex Housing Market Area' centred around Gatwick Airport. This area is distinct from that of the West Sussex Coastal Authorities (Adur District Council, Arun District Council, Chichester District Council and Worthing Borough Council together with the South Downs National Park Authority).
- 2.6 Whilst recognising that housing markets are not totally discrete, the three authorities continue to work and plan for this distinct Housing Market Area, and are building upon this evidence in the preparation of their respective Local Plans. The Northern West Sussex Authorities have engaged with the West Sussex Coastal Authorities and additionally Brighton and Hove and Lewes, in a number of ways (at Member and Chief Executive officer level), whilst work on the delivery of housing continues to progress based on the separate housing market areas within the Sussex Coast and the Gatwick Diamond. In a similar way, and with the agreement of the other authorities in the Gatwick Diamond area, the Northern West Sussex housing market area has been treated separately from the East Surrey housing market area. Where overlaps between these two housing market areas exist, these are being considered with the other authorities within the context of the Local Strategic Statement and the Memorandum of Understanding, and in Local Plan references, such as Reigate and Banstead.
- 2.7 The three local authorities have continued to commission joint evidence, including: the Employment Land Review started in 2009 (updated in 2010 and 2014), the Strategic Housing Market Assessment 2009 (updated in 2012 and 2014), the New Market Town Study (2009), the At Crawley Study (2010) and an update to the Employment Land Review, including an Economic Growth Assessment (2014). The authorities have also worked collaboratively on other studies relevant to the wider Gatwick Diamond area including the Gatwick Water Cycle Study 2011 and catchment based flood risk assessments. The authorities, as a matter of course, share methodologies and emerging evidence to ensure consistency and compatibility throughout the area, even if studies are being produced separately. These include Locally Generated Housing Needs Studies/Local Housing Assessments, Strategic Sites and Broad Locations across the Housing Market Area (SHLAA appendix) and Gypsy and Traveller Accommodation Needs Assessments. Further information on the work by the three authorities in relation to the housing evidence is set out in Section 6.

3. Principles of Joint Working

3.1 The Gatwick Diamond Local Authorities Memorandum of Understanding, to which the three authorities are party, established a broad framework for cooperation across the Gatwick Diamond Area. Within this context, the three authorities agreed the following additional principles to guide their joint working:

- To plan positively and achieve sustainable development in line with the National Planning Policy Framework requirements;
- To respect each other's right to develop their own plans that fit the specific circumstances of the District/Borough's communities;
- To work to produce a joint evidence base on relevant issues; and
- To meet regularly at Member and officer level to review the situation and respond to new issues and changing circumstances.

3.2 It has been agreed between the three authorities that:

- A joint Local Plan does not need to be produced (although an adopted local Joint Area Action Plan exists between Crawley Borough and Horsham District Councils);
- Joint policies would not be appropriate;
- Each authority will determine its own employment and housing targets but in so doing will consider them in the context of the key strategic issues and the particular circumstances of the other authorities; and,
- They will continue to work with the other Gatwick Diamond authorities on housing, employment and other strategic issues affecting the Gatwick Diamond as a whole.

3.3 The specific strategic matters which the three authorities have determined are relevant across the boundaries of the authorities are:

- Employment and economic development.
- Housing need.
- Specific aspects of infrastructure development.

4. Limitations on Joint Working

4.1 The three authorities recognise that there are limits to joint working including:

- Each authority has different local circumstances;
- Each authority is at a different stage in the process of producing their plans; and,
- There are issues better addressed through bilateral or other arrangements, examples of these are described in Section 8 below.

Despite these limits, the three authorities are committed to working positively together and as part of the Gatwick Diamond, sharing information and best practice and continuing to procure evidence jointly, where relevant, throughout the plan preparation phase and beyond. This co-operation and collaboration takes place at senior Member, Chief Executive and senior officer as well as at technical officer level.

5. Employment and Economic Development

Aim

5.1 The aim agreed by the three authorities is to secure policies which support realistic and sustainable levels of economic growth in the area, tailored to the particular needs of the individual local authority areas.

Action Taken to Date

5.2 The Northern West Sussex Authorities are located within the wider economic areas of the Coast to Capital Local Enterprise Partnership and the Gatwick Diamond. Between 2009 and 2010, the three local authorities worked closely together to

commission a joint, PPS4 compliant, Employment Land Review (part 1 and part 2) to inform their respective plans. In 2012, the Authorities (along with Mole Valley District Council, Reigate & Banstead Borough Council, Surrey and West Sussex County Councils) endorsed the Gatwick Diamond Local Strategic Statement which included agreement to a broad approach designed to support the growth of the Gatwick Diamond economy. The three authorities through the LSS and their individual planning policies will seek to collectively promote sustainable economic growth across the wider economic areas of the Gatwick Diamond and the LEP.

- 5.3 Ongoing work has continued to ensure that the authorities are informed and can plan for and promote the economy of the area. The Northern West Sussex Authorities' Economic Growth Assessment, published in April 2014, provides an overview of the potential economic future growth of the Northern West Sussex economic area as well as necessary, specific information for each of the three authorities with information on the local economy and its potential for growth to contribute to the development of Local Plans and corporate economic development policies. 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.

Outcomes

- 5.4 *Crawley* – The submission Local Plan focuses on the sub-regional employment function of Crawley as the main economic driver in the Gatwick Diamond. It encourages sustainable economic growth by directing employment uses to Crawley's existing main employment areas, whilst taking a more managed approach to its largest employment area - Manor Royal as the priority employment location for B-class uses. It is recognised within the Local Plan that a significant demand for employment floorspace, coupled with a limited supply of land available for economic development use, means that it may be necessary to assess opportunities for new economic development locations(s) at Crawley over the Plan period, potentially at a strategic site.
- 5.5 *Horsham* - The Horsham District Planning Framework which has progressed to Examination³ recognises the wider context of the Gatwick Diamond, the role of Horsham town as the primary location and focus for employment in the District which is complemented by the surrounding rural hinterland with its vibrant rural economy. It builds upon the established transport connections and the niche market offer within the District. It supports growth in employment land and communications to provide a diverse, resilient and flexible range of business premises which will provide good quality jobs and the opportunity of living close to where people work. A new significant amount of new floorspace is planned within a high value business park in a new strategic allocation north of and adjoining Horsham town. It also seeks to protect and enhance existing employment floorspace throughout the hierarchy of settlements as well as promoting starter units and move on accommodation to nurture and support growth of smaller businesses and attract inward investment.
- 5.6 *Mid Sussex* - The Mid Sussex District Plan seeks to support sustainable communities and a robust local economy by encouraging opportunities for residents to work within their towns and villages. It included provision and promotion of new employment land to meet its needs without impinging upon its neighbours. Regulation 18 consultation on the draft District Plan was carried out between November 2014 and January 2015.

³ The Inspector examining the HDPF has published his Initial Findings (December 2014) in which he found the Plan legally compliant and did not find significant issues with most aspects of the Strategy. He considers that HDC needs to do some more work to accommodate higher levels of housing.

The submission District Plan is due to be considered at Full Council in spring 2015, to be followed by Regulation 19 consultation.

6. Housing Need

Aim

- 6.1 The aim agreed by the three authorities is to as far as possible, within constraints, meet housing need in the Housing Market area which plays a significant role in supporting the economy of the wider Gatwick Diamond.

Action Taken to Date

- 6.2 Within the Gatwick Diamond, the Local Strategic Statement indicates that the local authorities will seek to secure sufficient housing and infrastructure to meet the needs of those who live or work in the area, focusing on the needs arising from the Gatwick Diamond economy. Crawley, Horsham and Mid Sussex have continued to work with the other Gatwick Diamond authorities and the wider LEP area as Local Plans are being prepared. In accordance with the National Planning Policy Framework, the local authorities have a clear understanding of and are planning for the housing needs their area.
- 6.3 A joint understanding of the constraints of the housing market area is also needed. Each authority has particular issues which can impact the delivery of housing whilst seeking to meet objectively assessed needs and to support the economy. The three authorities have set out the key constraints below.
- 6.4 Horsham and Mid Sussex share some environmental designations such as the High Weald Area of Outstanding Natural Beauty and both planning authorities are affected by the South Downs National Park.
- 6.5 Mid Sussex District Council has recently published a Capacity Study which demonstrates that 92% of the District is covered by primary constraints (such as AONB) or secondary constraints (such as low landscape capacity). A further 4% is already built upon. An important secondary constraint is the Ashdown Forest (Special Protection Area and Special Area of Conservation) where new housing development within 7km of the Forest has an impact on the protected bird populations. Although small-scale housing development (with mitigation) is likely to come forward within that 7km zone, it does limit the deliverability of large scale development, particularly at East Grinstead, which is also constrained by the A22/A264 acknowledged congestion problems.
- 6.6 Consultants commissioned by MSDC have undertaken a sustainability assessment of cross-boundary options for the Mid Sussex District Plan and, as part of this process, MSDC wrote on the 5th August 2014 to neighbouring local planning authorities, including Crawley Borough Council and Horsham District Council, to confirm formally whether they have unmet needs that they are seeking assistance with, and the detailed nature of any such needs.
- 6.7 The results of the sustainability assessment were shared with the neighbouring authorities, including CBC and HDC. MSDC has also shared the results of its updated work on housing need and supply. This evidence indicates an objectively assessed housing need of 627 homes per annum 2014-2031. A supply of 650 homes per annum is recommended in the proposed District Plan over the same period. The sustainability assessment advises that any supply in excess of local need is most likely to be absorbed by Crawley and Brighton & Hove, which have the strongest economic and functional links with Mid Sussex.

- 6.8 Within Horsham, just over 14.3% lies within the South Downs National Park and there is also the High Weald AONB, covering around 7% of the District situated in the north-east of the District, adjacent to the main towns of Horsham and Crawley. Due to historic patterns of land use, much of the landscape of the District is still heavily wooded, a considerable amount of which, over 6% is classified as ancient woodland. Approximately 8% of the land is designated for its importance in nature conservation terms, including the Arun Valley Special Protection Area and the Mens Woodland SAC, which are of international importance. The Mens Woodland SAC has a secondary area of constraint relating to the protection of bats which forage beyond the Internationally-designated site. Any new housing within secondary protection areas identified by the buffer zones around the SPAs has the potential to impact on protected species and the integrity of the protected habitat. The string of settlements located at the base of the South Downs scarp slope are bounded to the south by the South Downs National Park and flood plains of the river Arun or Adur to the north. These settlements are, therefore, particularly constrained. 6% of the district is located within functional floodplain, however, the majority of the district is very rural in character with its natural fluvial and surface water management role.
- 6.9 The Inspector undertaking the examination of the Horsham District Planning Framework issued his Initial Findings on 19 December 2014. This highlighted a need for additional work to be undertaken to accommodate a higher level of new housing than that proposed in the submission plan particularly to meet the needs of the NWS HMA. The Inspector concluded that he expected the council would be able to show that it has a five year supply of housing against a revised minimum target of 750dpa.
- 6.10 Infrastructure constraints are covered in more detail in Section 7, with waste water treatment works, including at Gatwick Waste Water Treatment Works and Goddards Green Waste Water Treatment Works (particularly the impact of the latter on the water quality of the River Adur) and transport (focusing on capacity on the A264/A22 and A23/M23) being the main issues within the area.
- 6.11 Crawley is the most constrained of the three authorities in terms of space in which to develop within the planning authority boundary. This affects the ability of the authority to deliver significant levels of housing. Crawley's boundaries are drawn tightly around the town. The M23 motorway forms the borough boundary to the east; to the west the urban boundary forms much of the borough boundary and to the south lies the High Weald Area of Outstanding Natural Beauty. Gatwick Airport is located within the borough to the north of the town. The land between the town and the airport is heavily constrained by noise and safeguarding including within Horsham District for the potential future development of the airport. Other land within the borough is highly valued for its ecology/biodiversity, open space, structural landscaping functions, important to the quality of life and amenity of residents within the town. Some areas of land are also constrained by flooding.
- 6.12 Each District and the Borough has undertaken an assessment of the amount of housing need with close working with each other as detailed above in paragraphs 2.5 – 2.7. This is informed by two key elements of evidence. Firstly, individual "Housing Assessment" reports have been prepared which include a range of demographic need and economic growth scenarios for each authority. These have continued to be updated in light of the release of new projections and further government national planning policy guidance⁴. Secondly, the Northern West Sussex Strategic Housing

⁴ Crawley Borough Council's Objective Assessment of Crawley's Housing and Employment Needs (OACHEN) (2015) Chilmark Consulting; Horsham District Council's housing needs assessment (2015) GL Hearn; Mid Sussex Council's Housing and Employment Development Needs (HEDNA) (2015) Mid Sussex District Council

Market Assessment (including the update in 2012 and 2014) has been undertaken, based on market and affordable housing need which covers the three authority areas jointly.

- 6.13 This work requires an understanding of the starting point in housing need terms of “objectively assessed need”. The three authorities have shared the methodologies and conclusions of each assessment. As the Mid Sussex Local Housing Assessment was prepared ‘in-house’, it has been possible to run all of the respective authorities’ data and assumptions through the Mid Sussex model as a check. This revealed broadly similar results to each authority’s published study. The three authorities are therefore in agreement that the methodologies, assumptions and results of each of the three Needs Assessments are broadly comparable and compatible. The data, according to the stage each local authority has been at in plan preparation, has been updated to take account of more detailed Census information and will, as required, be in draft format as the DCLG Household Projections are anticipated to be released 27 February 2015 and would subsequently need to be analysed.

Outcomes

- 6.14 The technical work involved in comparing the three authorities’ needs assessments has led to a detailed understanding between the authorities on the factors that influence population growth in the Housing Market Area, and consequently the need for new homes looking forward 20 years including the critical areas to plan for to support economic growth. This has involved detailed discussions and understanding of natural change (i.e. the number of births and deaths) and migration (internal and international) in each authority area.
- 6.15 Crawley’s growth is predominantly due to high levels of natural change (more births than deaths) which matches their lower age profile. Horsham and Mid Sussex experience lower levels of natural change, with migration more of a factor in increasing population numbers. For Mid Sussex, natural change only accounts for a housing need of 166dpa out of a baseline objectively assessed need of 570dpa. For Horsham this figure is 190dpa.
- 6.16 Work has also been undertaken to understand migration between the three authorities, this has been largely balanced in recent years which reinforces the strong relationship between the three authorities in the Housing Market Area.
- 6.17 Table 1 sets out the three authorities’ respective objectively assessed housing need. These are: Crawley 586 homes per annum⁵, Horsham 696⁶ homes per annum and Mid Sussex 627⁷ homes per annum. Therefore, it is estimated that a total of 1,913 net dwellings per annum would be required to meet the objectively assessed needs across the Northern West Sussex Authorities. This is the need that arises naturally from increasing birth rates, decreasing death rates, historic levels of net migration, plus a market uplift and taking account of housing needs generated by economic growth.
- 6.18 Table 1 also details the total proposed provision of 334 dwellings per annum (dpa) for Crawley, alongside a figure of 650dpa for Mid Sussex and 750⁸ for Horsham based on the most up-to-date progress in Local Plans. This would result in a total provision figure of 1,734 dpa for the Housing Market Area. Whilst this currently represents a

⁵ Crawley OACHEN Report (February 2015) Chilmark

⁶ Horsham District Planning Framework Inspector’s Initial Findings (December 2014)

⁷ Mid Sussex Submission District Plan Scrutiny Committee for Planning and Economic Development (March 2015)

⁸ Horsham District Planning Framework Inspector’s Initial Findings (December 2014)

shortfall in meeting the objectively assessed need in the Housing Market Area, the figures show an improved position from that at September 2013 and July 2014, reflecting that all three authorities are doing all they can to maximise capacity for housing development within their boundaries and thereby reduce the shortfall across the Housing Market Area which reflects the ongoing work and indicates effective and constructive cooperation has taken place.

Table 1 – Objectively Assessed Housing Needs and proposed housing provision – Northern West Sussex Authorities

	Mid Sussex	Crawley	Horsham	TOTAL
Demographic Need – Natural Change (Zero Net Migration)	166	395	190	751
Baseline Demographic Need (including migration)	570	533	600	1,703
Objectively Assessed Need	627	586	696	1,909 net dwellings per annum
Proposed Housing Provision	650	334	750	1,734 net dwellings per annum

- 6.19 Table 1 above shows that the Northern West Sussex Housing Market Area will be meeting its own internal demographic growth needs, including migration, in full. The housing shortfall in the objectively assessed need arises primarily from the market uplift and, as all three authorities are meeting their five year housing land supply requirements, this shortfall will arise in the latter part of the Plan period. Appropriate solutions to meet this shortfall will continue to be sought as revisions to plans are progressed, infrastructure provision is addressed and major issues, such as the decision on a possible second runway at Gatwick Airport are resolved which will have major implications for this area.
- 6.20 The three authorities have acknowledged each other's positions and have a clear understanding of the objectively housing requirements within the Northern West Sussex Housing Market Area. Due to the different stages of plan preparation across the area, the technical joint working on housing requirements and discussions on housing delivery will continue.
- 6.21 The three authorities recognise that, across the North West Sussex housing market area as a whole, the local plans they are producing will not fully meet objectively assessed housing needs, a shortfall generated primarily from within Crawley where a variety of constraints dictate a capacity-led approach to meeting housing needs. Each authority has assessed the ability of its area to accommodate further housing development in the light of this shortfall. They each consider that they are doing the maximum reasonable to meet the objectively assessed housing needs of the area as a whole, taking into account local constraints, and the need for sustainable development.
- 6.22 The Sussex Coastal Housing Market Area has identified a significant shortfall of housing provision, and the three northern West Sussex authorities will continue to work with the Sussex Coastal authorities and within the Northern West Sussex

Housing Market Area to understand how the projected housing shortfalls in both areas can be reduced. In particular, they will be working with the LEP to see how they can help remove barriers and constraints to development in the Gatwick Diamond and along the Sussex Coast. The three authorities, as part of the Gatwick Diamond, have also engaged with the Further Alterations to the London Plan. It is assumed by the Northern West Sussex authorities that, in those local planning authority areas which are proposing not to meet their needs, they will leave “no stone unturned” to ensure that as much housing as possible can be delivered in their boundaries.

7. Infrastructure

Aims

- 7.1 The aim agreed by the three authorities is to understand which cross boundary infrastructure issues, needs or projects should appropriately be addressed jointly by the Northern West Sussex Authorities in the context of their emerging plans to manage patterns of growth to maximise development in sustainable locations and to secure infrastructure to deliver planned growth. The three authorities also aim to ensure that the level of development is consistent with infrastructure required to deliver development in the Northern West Sussex area over the lifetime of the respective plans.

Action Taken to Date

- 7.2 An assessment of the capacity of the Waste Water Treatment Works at Crawley was undertaken in the ‘At Crawley Study’⁹ and subsequently reinforced by updated information sought from the infrastructure providers during August/September 2014. This has confirmed that there is only capacity prior to 2021 at the Crawley treatment works to accommodate two strategic sites. These are Kilnwood Vale and Forge Wood at Crawley, which are both now under construction. The Gatwick Water Cycle Study was also commissioned in 2011 to look at the issue of Waste Water Treatment Works and the implication of development on water quality in the area. The Gatwick Water Cycle Study indicates that the Environment Agency has a clear position on private sewage treatment works: they will not normally grant discharge consents for a private sewerage treatments system where it is more reasonable to connect to a public foul sewer.
- 7.3 The capacity of Goddards Green Wastewater Treatment Works near Burgess Hill in Mid Sussex area has an enforced limit of the level of development acceptable within the catchment area of the treatment works which is imposed by a) the capacity of the works and b) the limit of the discharge license approved by the Environment Agency. This relates to the already poor water quality in the River Adur, into which this Waste Water Treatment Works discharges. Southern Water have confirmed that due to changes in discharge licences arrangements with the Environment Agency in 2013, capacity has increased slightly and the Treatment Works can accommodate the development proposed in the Mid Sussex District Plan. This arrangement will not cover any additional development beyond that was proposed in the Mid Sussex District Plan submitted in July 2013 (since withdrawn).
- 7.4 An assessment of the transport requirements for strategic locations at Crawley was undertaken in the ‘At Crawley Study’. This identified that significant investment would be needed in highway infrastructure including the need for a western relief road around Crawley in the event of significant further development west of Crawley.

⁹ Crawley Borough Council, Horsham District Council & Mid Sussex District Council “At Crawley Study 2009” Final Report (October 2009) GL Hearn

- 7.5 Each authority has undertaken individual Transport Studies, using shared methodology and overseen by WSCC, as part of their evidence base. Horsham and Crawley have worked together over production of a joint evidence base for the Joint Area Action Plan and Mid Sussex and Crawley have liaised with each other to make sure that cross-boundary transport impacts are understood in relation to potential development sites close to the boundaries of the two authorities. Issues focus on the A264/A22 corridors which severely constrains development at East Grinstead and in Mid Sussex close to the boundary with Crawley, as well as the M23/A23 constrained junctions which impact on any potential development on the boundary between the three authorities. Although undertaking separate studies, Crawley and Mid Sussex commissioned the same transport consultant to undertake the work using the similar transport modelling data for both authorities.
- 7.6 Horsham undertook a Transport and Development Study to determine the cumulative impact on the highway network and public transport as a result of three main locations, future potential development in Horsham town centre and the planned strategic growth proposed by the Horsham District Planning Framework at land north of Horsham town, Southwater and Billingshurst.
- 7.7 Further assessments will be carried out to understand the combined models and ensure consistency of data/messages and cumulative impact of all three Plans. Horsham District Council are modelling 750 dwellings per annum.

Outcomes

- 7.8 The Northern West Sussex Authorities are in agreement that waste water capacity is a constraint to development in the area, over the lifetime of the respective plans. Additional work may need to be undertaken by the three authorities to look in detail at what long-term actions are necessary to inform the future business plans of the water companies that deliver waste water treatment within the area in conjunction with the Environment Agency and the water companies.
- 7.9 The Northern West Sussex Authorities are in agreement that transport infrastructure required to deliver development in the north of the area is a significant constraint over the lifetime of the respective plans. The three councils will continue to share information as transport studies are updated and will work together where necessary to resolve any cross-boundary issues alongside the LEP, West Sussex County Council or the Highways Agency.

8. Matters to be dealt with elsewhere

- 8.1 As indicated earlier in this statement the Northern West Sussex Authorities will continue to work on the full range of strategic issues with the other Gatwick Diamond authorities. Some issues between two authorities and those across the wider Gatwick Diamond will need to be dealt with separately from this statement as set out below.
- 8.2 Those matters that the Northern West Sussex Authorities have specifically agreed to exclude from this Statement are:
- a. Gatwick Airport and additional airport capacity will be covered primarily through joint working with the Gatwick Diamond Local Authorities and Gatwick Joint Local Authorities grouping: including the Airports Commission recommendation and the subsequent government decision;
 - b. Flood risk is a particular concern to Crawley Borough Council, but it does not have a similar impact on the other two authorities, (joint working has previously existed between the Environment Agency, Crawley Borough Council, Mid Sussex District Council, Horsham District Council, Mole Valley District Council and

Reigate and Banstead Borough, Surrey County Council and Tandridge District Council in relation to the Upper River Mole catchment).

- c. Alongside an agreement across the Gatwick Diamond, the local authorities will share information about the needs of the gypsy and travelling show people communities, and each authority will work towards accommodating the needs of the permanent Traveller population that have been identified within its own area. A Transit site has been granted planning permission in Chichester to serve the whole of the West Sussex County following a study, commissioned in July 2013 (by Mid Sussex on behalf of the West Sussex authorities), looking at the issue of unauthorised encampments;
- d. The Gatwick Diamond Local Authorities have agreed to maintain a coordinated approach to the review of Town Centres and their roles and the Northern West Sussex Authorities will continue joint work within that framework. The potential growth of Crawley Town Centre has been accepted through the Gatwick Diamond Local Strategic Statement, but it is also accepted that the character and supporting roles of other town centres needs to be recognised with some regeneration to perform vital roles for their community; and,
- e. The low carbon economy is to be dealt by the individual authorities working either on their own or, as appropriate, with others. They will maintain an awareness of initiatives which are coming forward so that joint working can be put in place if appropriate.

9. Process for Review and Further Engagement

- 9.1 The three authorities will continue to collaborate extensively as the Northern West Sussex Authorities and through the Gatwick Diamond to ensure that the on-going requirements of the Duty to Co-operate are met. This includes continued engagement with adjacent housing market and economic areas such as the Coastal Authorities and London. All three authorities are working together on the housing and economic growth requirements. There is senior Member and officer commitment to continue to collaborate and develop joint solutions to issues. The three authorities have developed a strong understanding of the housing market area and will continue to respond to new issues and changing circumstances together, as the three authorities' plans progress to submission and approval.

Signature



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

A handwritten signature in cursive script, appearing to read 'Claire Vickers', written in black ink.

Horsham District Council
Councillor Claire Vickers, Cabinet member for Living and Working Communities

A handwritten signature in cursive script, appearing to read 'Norman Webster', written in black ink.

Mid Sussex District Council
Councillor Norman Webster, Cabinet Member for Planning

NWS Position Statement APPENDIX A: Localism Act 2011 – Duty to Co-operate

110 Duty to co-operate in relation to planning of sustainable development

- (1) In Part 2 of the Planning and Compulsory Purchase Act 2004 (local development) after section 33 insert—

“33A Duty to co-operate in relation to planning of sustainable development

- (1) Each person who is—
- (a) a local planning authority,
 - (b) a county council in England that is not a local planning authority, or
 - (c) a body, or other person, that is prescribed or of a prescribed description,
- must co-operate with every other person who is within paragraph (a), (b) or (c) or subsection (9) in maximising the effectiveness with which activities within subsection (3) are undertaken.
- (2) In particular, the duty imposed on a person by subsection (1) requires the person—
- (a) to engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and
 - (b) to have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3).
- (3) The activities within this subsection are—
- (a) the preparation of development plan documents,
 - (b) the preparation of other local development documents,
 - (c) the preparation of marine plans under the Marine and Coastal Access Act 2009 for the English inshore region, the English offshore region or any part of either of those regions,
 - (d) activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) that are, or could be, contemplated, and
 - (e) activities that support activities within any of paragraphs (a) to (c), so far as relating to a strategic matter.
- (4) For the purposes of subsection (3), each of the following is a “strategic matter”—
- (a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and
 - (b) sustainable development or use of land in a two-tier area if the development or use—
 - (i) is a county matter, or
 - (ii) has or would have a significant impact on a county matter.

- (5) In subsection (4)—
- “county matter” has the meaning given by paragraph 1 of Schedule 1 to the principal Act (ignoring sub-paragraph 1(1)(i)),
 - “planning area” means—
 - (a) the area of—
 - (i) a district council (including a metropolitan district council),
 - (ii) a London borough council, or
 - (iii) a county council in England for an area for which there is no district council,but only so far as that area is neither in a National Park nor in the Broads,
 - (b) a National Park,
 - (c) the Broads,
 - (d) the English inshore region, or
 - (e) the English offshore region, and
 - “two-tier area” means an area—
 - (a) for which there is a county council and a district council, but
 - (b) which is not in a National Park.
- (6) The engagement required of a person by subsection (2)(a) includes, in particular—
- (a) considering whether to consult on and prepare, and enter into and publish, agreements on joint approaches to the undertaking of activities within subsection (3), and
 - (b) if the person is a local planning authority, considering whether to agree under section 28 to prepare joint local development documents.
- (7) A person subject to the duty under subsection (1) must have regard to any guidance given by the Secretary of State about how the duty is to be complied with.
- (8) A person, or description of persons, may be prescribed for the purposes of subsection (1)(c) only if the person, or persons of that description, exercise functions for the purposes of an enactment.
- (9) A person is within this subsection if the person is a body, or other person, that is prescribed or of a prescribed description.
- (10) In this section—
- “the English inshore region” and “the English offshore region” have the same meaning as in the Marine and Coastal Access Act 2009, and
 - “land” includes the waters within those regions and the bed and subsoil of those waters.”
- (2) In section 16 of the Planning and Compulsory Purchase Act 2004 (applying Part 2 for purposes of a county council’s minerals and waste development scheme) after subsection (4) insert—
- “(5) Also, subsection (3)(b) does not apply to section 33A(1)(a) and (b).”

- (3) In section 20(5) of the Planning and Compulsory Purchase Act 2004 (development plan documents: purpose of independent examination) after paragraph (b) insert “; and
 - (c) whether the local planning authority complied with any duty imposed on the authority by section 33A in relation to its preparation.”

NWS Position Statement APPENDIX B: National Planning Policy Framework extract – Duty to Co-operate

Planning strategically across local boundaries

Include para 159 as this is quoted in the Position Statement.

‘178. Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the **strategic priorities** set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

179. Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.

180. Local planning authorities should take account of different geographic areas, including travel-to-work areas. In two tier areas, county and district authorities should cooperate with each other on relevant issues. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. Local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers.

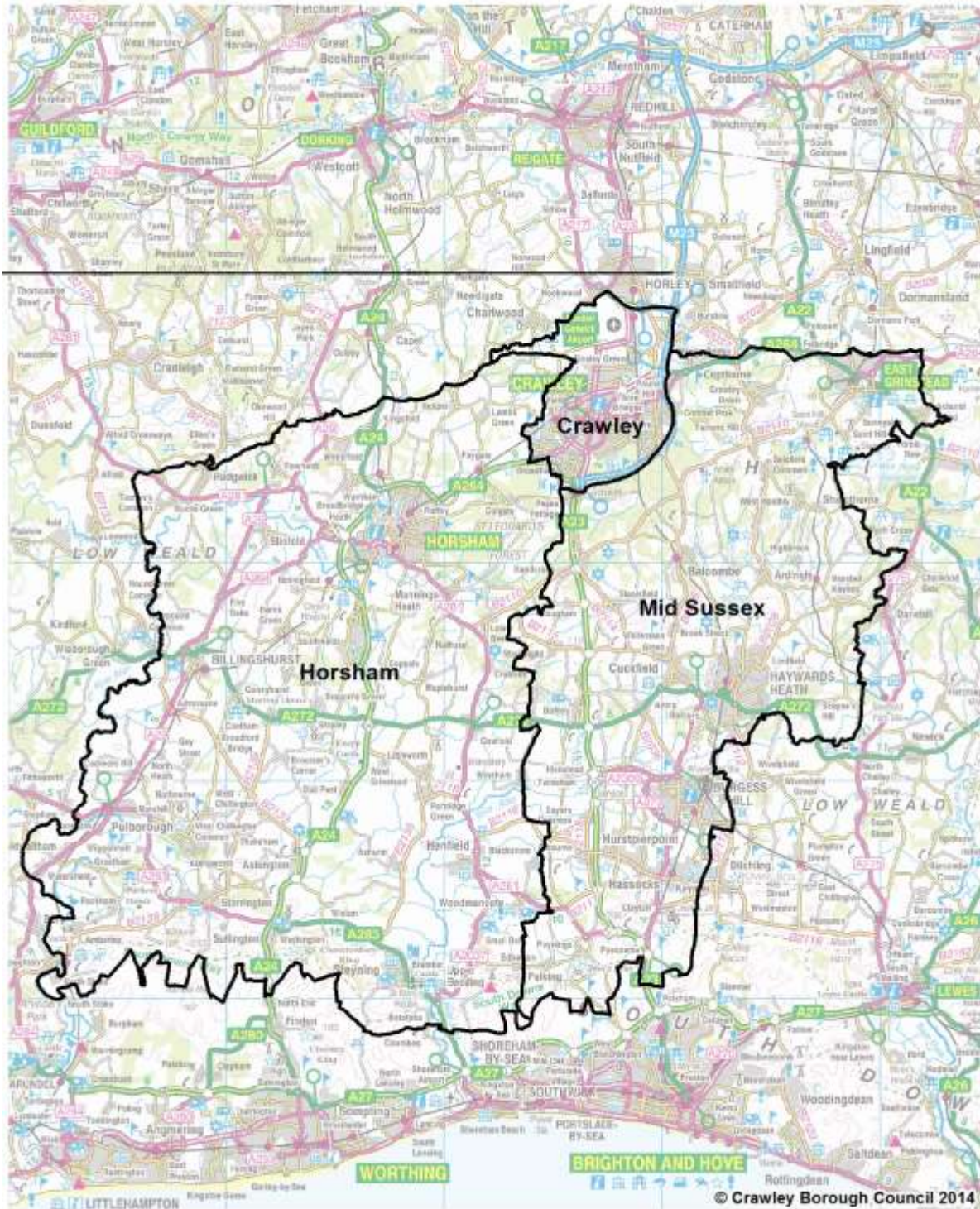
181. Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

Examining Local Plans

182. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;’

NWS Position Statement APPENDIX C: MAP OF THE NORTHERN WEST SUSSEX AUTHORITIES



APPENDIX D: CORRESPONDENCE FROM NATURAL ENGLAND ON HABITAT REGULATIONS

Brigden, Elizabeth

From: Lister, John (NE) <John.Lister@naturalengland.org.uk>
Sent: 29 November 2013 12:58
To: Webster, James
Subject: 101590 - Habitats Regulation Assessment for Crawley's Local Plan

Dear James,

Thank you for consulting Natural England on your HRA.

On the basis of the documents to hand, Natural England concurs that your plan is not likely to have significant effect on internationally important wildlife sites, either alone or in combination with other projects and plans.

Yours sincerely,

John Lister

Lead Adviser
Land Use Services Team - Ashford
Natural England

Mobile - 0790 060 8172

www.naturalengland.org.uk

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

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APPENDIX E: LOCAL DEVELOPMENT SCHEMES TIMETABLES

Planned Timetable	CBC LDS 2008	CBC LDS 2013	CBC LDS July 2014	CBC LDS November 2014
Total Production Period	January 2008 – April 2012	January 2008 – January 2008	January 2008 – October 2015	January 2008 – October 2015
Target date for Non Statutory Consultation (Regulation 18)	(Regulation 25) May – June 2009	Early engagement: January – March 2012 Consultation on the council's preferred strategy document: October – December 2012 Site Allocations Consultation: May – June 2013	Early Engagement: January – March 2012 Consultation on council's preferred strategy document: October – December 2012 Site Allocations Consultation: June – July 2013	Early Engagement: January – March 2012 Consultation on council's preferred strategy document: October – December 2012 Site Allocations Consultation: June – July 2013
Target date for proposed submission period for representation (Regulation 19)	(Regulation 27) September – October 2010	November – December 2013	September – October 2014	September – October 2014
Target Date for Submission	April 2011	January 2014	November 2014	November 2014
Target Date for pre-examination meeting	June 2011	March 2014	January 2015	January 2015
Target Date for start of hearing sessions	September 2011	May – June 2014	March 2015	March 2015
Target Date for receipt of Inspector's Report	January 2012	September 2014	June 2015	June 2015
Target Date for Adoption and Publication	April 2012	Cabinet & Full Council: November – December 2014 Adoption: December 2014/ January 2015	Cabinet & Full Council: September – October 2015 Adoption: October/November 2015	Cabinet & Full Council: September – October 2015 Adoption: October/November 2015