Crawley Borough Council

Authority's Monitoring Report 1 April 2013 – 31 March 2015



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AUTHORITY'S MONITORING REPORT (AMR)

Executive Summary

This Authority's Monitoring Report covers the period from 1 April 2013 to 30 March 2015. It also contains more up-to-date information from 2015-16, including housing and economic data for the first two quarters of 2015-16, and updates on progress with the Crawley Borough Local Plan and other documents. It is produced and set out in accordance with Regulation 34 of the Town and Country (Local Planning) (England) Regulations 2012.

The key topic areas and points of the report are as follows:

Progress on Local Plan and Local Development Scheme (LDS) Implementation

- The council's Local Development Scheme has been updated to take account of the course of the Crawley Borough Local Plan Examination.
- Progress on the documents included in the Local Development Scheme is currently on course, as follows:
 - The Crawley Borough Local Plan was adopted by resolution of Full Council on 16 December 2015.
 - Progress has been made towards the adoption of a Community Infrastructure Levy Charging (CIL) Schedule in line with the LDS timetable, with a Draft Charging Schedule being publicly consulted on in autumn 2015 and submitted for examination in December 2015. The Inspector's Report, recommending approval of the Charging Schedule, was received on 7 March 2016.
 - Preparation of the suite of Supplementary Planning Documents detailed in the LDS has begun in accordance with the LDS timetable.
 - Work on the other documents (Development Briefs and Conservation Area Statements) detailed in the LDS is at an early stage.

Monitoring Policy Effectiveness

- In light of the recent adoption of the Local Plan, this report focuses on a narrow range of indicators as follows:
 - Policy H1: Housing Provision. Housing completions during the monitoring period have been in line with the numbers set out in the September 2013 Housing Trajectory published with the 2013 AMR.
 - Policy H4: Affordable and Low Cost Housing. The provision of affordable and low cost housing, calculated as a proportion of total housing completions, has exceeded the 40% target in Policy H4.
 - Policy EC1: Sustainable Economic Growth. The available supply of employment land is being taken up primarily by employment uses, with completed losses to other uses currently remaining at anticipated levels.
 - Policy EC6: Development Sites within the Town Centre Boundary. Proposals for the development of the named sites are at various stages, in the context of an encouraging overall picture.

Neighbourhood Development Plans/Orders

• No Neighbourhood planning documents have been made by the council.

Duty to Cooperate

• The council has acted in line with the Duty to Cooperate, as detailed in Part 5 and Appendix C below.

Part 1. Introduction

Nature and purpose of document

- 1.1. This Authority's Monitoring Report (AMR) details the Crawley Borough Council's progress in developing, adopting and implementing local planning policies. Regulation 34 of the Town and Country (Local Planning) (England) Regulations 2012 requires AMRs to be produced and specifies requirements as to their content and scope. The approach and indicators used in this AMR also conform to the council's own Monitoring and Implementation Framework (MIF), which was published in 2015.
- 1.2. The present AMR is the first to be published since the Annual Monitoring Report for 2012-13. It covers the period from 1 April 2013, which marked the close of the monitoring period of that report. In the intervening period there has been frequent publication of further information as part of the submission and examination of the Crawley Borough Local Plan.
- 1.3. Crawley Borough Council intends to continue its monitoring framework and reporting arrangements on an 'at least' annual basis, to make relevant information available to the public. Should new information be available more frequently, it will be made available at the earliest opportunity, rather than waiting for the production of a new AMR.

Contents and Structure

- 1.4. This AMR is divided into sections covering the following areas:
 - **Part 2:** Progress made with documents detailed in the council's Local Development Scheme (LDS), including the Local Plan and Community Infrastructure (CIL) Charging Schedule;
 - **Part 3:** Account of policy implementation focusing on four 'critical' indicators identified in the Monitoring and Implementation Framework as being particularly central to meeting the council's overall vision for the future growth of the borough;
 - **Part 4:** Details of any neighbourhood plans or neighbourhood development orders made by the council;
 - **Part 5:** Details of co-operation undertaken with other local planning authorities, county councils or other bodies in line with the Duty to Cooperate set out in section 110 of the Localism Act 2011.

Part 2. Progress on Local Plan and Local Development Scheme (LDS) Implementation

Introduction

- 2.1. Section 15 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to prepare and maintain a Local Development Scheme, giving details of proposed local planning policy documents and timetables for their preparation and adoption. AMRs are required to detail progress in the preparation of these documents and the extent to which the relevant timetables have been followed.
- 2.2. Over the last year, the council has been working to an LDS published in November 2014 and it is against this that any relevant tests concerning the legal compliance of the Local Plan's preparation was assessed. This document was superseded on 3 December 2015 by an updated LDS, which takes account of the timetable followed by the examination of the Local Plan, and is used for the purposes of this AMR. Appendix A lists the documents specified in the updated LDS, and the timetables for their preparation.
- 2.3. The remainder of this section will describe current progress on each document, beginning with the Local Plan. This is the only Local Development Document in the LDS to enjoy the status of 'Development Plan Document' (DPD), reflecting its importance as the key source of Crawley's local planning policies. Thereafter details are provided regarding progress on Crawley's Community Infrastructure Levy (CIL) Charging Schedule, and on the suite of Supplementary Planning Documents (SPDs) and other documents being prepared in support of the Local Plan.

Local Plan

- 2.4. The Local Plan contains the policies that guide development in the borough during the period to which it corresponds. For the purposes of this AMR the Local Plan is 'Crawley 2030', covering the period 2015-2030. Throughout this AMR period, the Local Plan was prepared for submission to the Secretary of State for its independent examination.
- 2.5. The Plan was submitted on 26 November 2014, further to approval at Full Council on 23 July 2014, and Publication Consultation (Regulation 19) held between September and October 2014. Examination hearing sessions were held during spring 2015. The Inspector's Final Report was issued on 2 November 2015 and concluded the Plan to be legally compliant and 'sound' subject to main modifications. The Crawley Borough Local Plan was adopted by resolution of Full Council on 16 December 2015.
- 2.6. In order to be found 'sound' and capable of adoption by a Local Planning Authority, a Local Plan must be accompanied by a number of additional documents when submitted for examination by the Planning Inspectorate:
 - A Sustainability Appraisal;
 - A Local Plan Map;
 - A Consultation Statement;
 - Copies of representations made in response to public consultation.
- 2.7. In addition to these, Crawley Borough Council prepared a substantial number of evidence base documents as part of the consultations held and for submission. Additional documents were published following the Local Plan's submission in order to support the examination, including those provided in

response to the Inspector's note of 1 April 2015 and as part of the modifications consultation. The full set of supporting and evidence base documents published during this AMR period is set out in Appendix B.

Progress

- 2.8. For the purpose of establishing the legal compliance of the Local Plan its content and timetable were assessed against the November 2014 LDS as part of the examination of the Plan. The Inspector concluded that the Plan was compliant with the LDS. Following the conclusion of the examination (marked by the issue of the Inspector's Report from the Planning Inspectorate), the Local Plan has proceeded in accordance with the details provided in the updated December 2015 LDS.
- 2.9. Since 1 April 2013 the following progress has been made towards the adoption of the Local Plan:

Date	Stage
4 June – 1 July 2013	Additional Site Allocation Consultation
23 July 2014	Full Council approval was given for Publication Consultation and Submission
1 September – 13 October 2014	Publication (Submission) Consultation on submission Plan
26 November 2014	Local Plan and supporting documents submitted
17 – 27 March 2015	Public examination hearings held
18 May 2015	Additional hearing session
26 May & 23 June 2015	The Inspector's preliminary findings were communicated to the council
1 July-12 August 2015	Consultation on proposed modifications
18 August – 18 September 2015	Consultation on further major modification to Policy H4 following legal judgment in case [2015] EWHC 2222 (Admin) on 31 July 2015
2 November 2015	The Inspector's final report and associated schedule of modifications required to make the Plan sound were communicated to the council.
2 December 2015	CBC Cabinet recommendation for adoption of the Plan by Full Council
16 December 2015	Plan adopted by resolution of Full Council

Community Infrastructure Levy Charging Schedule

2.10. The Community Infrastructure Levy (CIL) was introduced by the Planning Act 2008 and came into force through the CIL Regulations 2010, which have subsequently been amended. The purpose of CIL is to raise funds from developers to help pay for infrastructure that is required to support new development across the borough.

- 2.11. Crawley Borough Council intends to use CIL to secure contributions towards infrastructure. The CIL regulations require that in order to do this, a Local Planning Authority must first adopt a Charging Schedule. A CIL Charging Schedule is not a Development Plan Document like the Local Plan, but remains an important document subject to specific preparation and adoption procedures which are set out in the regulations.
- 2.12. Work towards introducing a CIL Levy across Crawley borough commenced with the preparation of a viability study undertaken in 2013. However, due to the need for timing the introduction of CIL to coincide with the adoption of the new Local Plan, consultation on a Preliminary Draft Charging Schedule was undertaken in spring 2015. Consultation on the Draft Charging Schedule was carried out in autumn 2015, with submission for its independent examination taking place in December 2015. On 7 March 2016, the council received the Inspector's Report, which concluded that the Draft Charging Schedule provides an appropriate basis for the collection of the Levy in the area.
- 2.13. Since 1 April 2013, a number of evidence base documents have been published to support the council's proposed approach to charging for CIL:

Preliminary Draft Charging Schedule Consultation:

- Crawley Borough Council Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment (October 2013)
- Crawley Whole Plan and CIL Viability Assessment (April 2015)
- Crawley Infrastructure Delivery Schedule (2015)
- Preliminary Draft Charging Schedule (2015).

Draft Charging Schedule Consultation:

- Crawley Infrastructure Plan (2014)
- CIL Viability Assessment Update with Appendices and individual Residential and Commercial Viability Appraisals (August 2015)
- Crawley CIL Draft Charging Schedule (September 2015)
- Draft Regulation 123 List (September 2015)
- Crawley Infrastructure Delivery Schedule (September 2015).

Progress

2.14. Preparation of the CIL Charging Schedule over the monitoring period has successfully met the timetable set out in the LDS. Since 1 April 2013 the following progress has been made:

Date	Stage
16 February – 30 March 2015	Preliminary Draft Charging Schedule Consultation
9 September 2015	Cabinet approval given for Consultation on CIL Draft Charging Schedule
29 September – 10 November 2015	Draft Charging Schedule Consultation
21 December 2015	Submission of Charging Schedule for Examination
7 March 2016	Receipt of Inspector's Report recommending approval of the Charging Schedule

Supplementary Planning Documents

- 2.15. Supplementary Planning Documents (SPDs) provide guidance on how to fulfil the requirements set out in the policies of the Local Plan. They do not themselves contain or change policies.
- 2.16. The preparation and adoption of SPDs is subject to special requirements, requiring a period of 'early engagement' as well as a subsequent formal public consultation.
- 2.17. The following SPDs are listed in the Local Development Scheme:
 - Affordable Housing
 - Planning and Climate Change
 - Green Infrastructure
 - Town Centre Wide
 - Urban Design
 - Development of Gatwick Airport
- 2.18. All of the SPDs have a shared timetable in the Local Development Scheme apart from the Development of Gatwick Airport SPD, which has a separate timetable which will be dependent on a further government announcement regarding the expansion of airport capacity in the South East of England.
- 2.19. A guidance note, to accompany the introduction on the CIL Charging Schedule, in relation to planning obligations and S106 Agreements is identified in the LDS, updating and replacing the existing Planning Obligations and S106 Agreements SPD (2008).

Progress

- 2.20. Progress towards the adoption of the SPDs has successfully met the timetable set out in the LDS. In September 2015, the council commenced a period of 'early engagement' regarding the five SPDs with linked timetables. A wide range of internal and external stakeholders were invited to sign up to be kept informed of the progress of the documents, and to answer general questions regarding the coverage of the SPDs.
- 2.21. A formal public consultation commenced for two of the documents: Planning and Climate Change and Urban Design SPDs, on 1 March 2016, taking place over a four-week period until 29 March 2016.

Other Planning Documents

- 2.22. A number of additional documents are being prepared to support the planning process. These fall into different categories but generally have the role of amplifying the guidance contained in the Local Plan or SPDs by providing more specific, detailed and technical information about the kind of development the council would like to encourage in smaller geographical areas.
- 2.23. Since these documents are not Supplementary Planning Documents, it is not a requirement that the timetable for their preparation be covered by the LDS. However, in light of their important contribution to planning within the borough, and in order to demonstrate the council's commitment to their timely progression and preparation, they have been included in the LDS.
- 2.24. The key types of documents include:
 - Development Briefs
 - Conservation Area Statements

Development Briefs

- 2.25. Development Briefs seek to support and influence the development of particular sites allocated in the Local Plan by providing detailed information about their characteristics and how landowners and developers can best accommodate these in their proposals. Development Briefs for the following sites allocated by Policy H2 of the Local Plan are under preparation:
 - Tinsley Lane
 - Breezehurst Drive Playing Fields
 - Land East of Balcombe Road/Street Hill

Progress

2.26. Formal steps towards the adoption of the Development Briefs are due to begin with a period of 'early engagement' beginning in early 2016.

Conservation Area Statements

- 2.27. Conservation Area Statements reinforce and support the designation of individual Conservation Areas by describing in greater detail the special architectural, historical and environmental qualities which make them distinctive and worthy of designation. They also provide development guidance informed by these qualities and suggest improvements which have the potential to enhance the areas' special character.
- 2.28. Updated Conservation Area Statements are being prepared for each of Crawley's Conservation Areas as follows:
 - Brighton Road
 - Dyers Almshouses
 - Forestfield and Shrublands
 - Hazelwick Road
 - High Street
 - Ifield Village
 - Malthouse Road
 - St Peters
 - Southgate Neighbourhood Centre
 - Sunnymead Flats
 - Worth
- 2.29. Work on the Conservation Area Statements is being led by Crawley's Conservation Area Advisory Committees (CAACs), rather than by council officers. CAACs are groups affiliated to the council which are made up of local people and others with an interest in the area and its heritage.

Progress

2.30. On account of the role played by the CAACs in the preparation of Conservation Area Statements, the LDS does not set out a definitive timetable for their adoption. However, the groups are working with the council to have the Statements in place by winter 2016.

Part 3. Monitoring Policy Effectiveness

- 3.1. The Local Plan regulations state that an Authority's Monitoring Report must identify any Local Plan policies which are not being implemented. Reasons should be given for the failure to achieve or implement policies, and any appropriate measures should be identified to rectify the situation, either by finding means to overcome obstacles to implementation or by reviewing the policy.
- 3.2. This is the first AMR following the adoption of the Local Plan. The approach that the council proposes to take in monitoring implementation of policies in the Plan is set out in its Monitoring and Implementation Framework (MIF), published in 2015. This identifies key indicators, further indicators, objectives and milestones for the various policies included in the Plan.
- 3.3. Because the Local Plan has only just been adopted, and was not the adopted Development Plan for the borough over the monitoring period, it is not at present feasible or meaningful to assess performance against most of the indicators detailed in the MIF. Instead, this report will focus on those four policies and associated key indicators which are identified in the MIF as forming 'a more critical element of meeting the council's overall vision for the future growth of the borough', namely:
 - Policy H1: The delivery of net housing against the annualised average housing number;
 - Policy H4: The delivery of net affordable housing against the annual average affordable housing requirement;
 - Policy EC1: The provision and delivery of total employment floorspace against the Economic Growth objectively assessed need;
 - Policy EC6: The delivery of the Town Centre Opportunities sites allocated in the Policy.
- 3.4. Therefore, this AMR will provide the baseline data from which to monitor progress against these key indicators. Future AMRs, published on an 'at least' annual basis, will also cover a wider range of policies and indicators to illustrate the effective implementation of the Crawley Borough Local Plan and highlight any early signs of policies not being implemented, in conformity with the Local Planning regulations. In accordance with the MIF, their scope in monitoring the policies of the Local Plan will reflect the most appropriate timescales for the monitoring of the implementation of individual policies against the relevant indicators.
- 3.5. Once the CIL Charging Schedule is adopted by the council, subsequent AMRs produced by the council will monitor the implementation of CIL in accordance with the requirements set out in the Local Plan and CIL regulations.

Policy H1: Housing Provision

- 3.6. Policy H1 makes provision for the development of a minimum of 5,100 net additional dwellings in the borough over the period 2015-2030. This equates to an annual average figure of 340 dwellings. Two key factors should be borne in mind when considering this figure:
 - The H1 target is informed by an assessment of the borough's Objectively Assessed Housing Need which includes allowance for under-delivery in the years before the commencement of the Local Plan period.
 - The H1 figure is at the same time 'supply-led', reflecting the constrained availability of land in the borough and the finite supply of sites available

for housing. As detailed in updates to the borough's Housing Trajectory, performance against the annualised average figure will closely reflect progress in the development of allocated sites. This is expected to be slow at the outset, reflecting the lead-in times on larger sites and the relatively recent nature of the economic recovery, before accelerating in the middle period as the major sites currently under way reach completion. Housing delivery is then expected to slow again in the final years of the Plan period.

- 3.7. The implementation of Policy H1 is assessed in Tables 3.1 and 3.2, which cover the period 2013-15 and the first two quarters of 2015-16 respectively. Because the years covered in Table 3.1 fall outside the Local Plan period, the most appropriate measure of performance was judged to be the projected housing completions for those years that were contained in the September 2013 Housing Trajectory which was published with the 2012-13 AMR. However, for purposes of illustration, the 2013-15 net completions are also shown in relation to the Local Plan Policy H1 target of 340 dwellings per annum. Table 3.2 uses the relevant Policy H1 average target (i.e. 85 dwellings per quarter) as the sole point of comparison.
- 3.8. Table 3.1 shows that the total number of net dwellings completed over the period 2013-15 (420) exceeds the projection from the September 2013 Housing Trajectory (404), albeit with a different distribution between the two years. While completions over this time did not approach the annual average Policy H1 rate, they are encouraging as an indicator of the realism of the council's Housing Trajectory in predicting future completions.

Table 3.1: Gross and net housing completions 2013-15, measured against projections in the September 2013 Housing Trajectory and the Local Plan policy H1 average annual target¹

Year	Gross delivery	Losses	Net delivery	Sept 2013 HT Projection	As % of HT figure	H1 average annual target	As % of H1 target
2013- 14	197	3	194	107	181%	340	57%
2014- 15	227	1	226	297	76%	340	66%

3.9. The figures in Table 3.2 indicate that housing completions during the first half of 2015-16 have lagged some way behind the corresponding H1 average annual target. The final annual monitoring for the 2015-2016 period will be published in the next AMR.

¹ The completion figures in Table 3.1 are derived from a combination of sources with the aim of making them as complete as possible. The sources include West Sussex County Council monitoring data, Building Control completions information provided by Sussex Building Control and NHBC, and some internal monitoring. Figures based on other criteria may differ.

Period	Gross delivery	Losses	Net delivery	H1 average quarterly target	As % of H1 target
Q1 2015-16	5 15	0	15	85	18%
Q2 2015-16	5 15	0	15	85	18%

Table 3.2: Gross and net housing completions in quarters 1 and 2 of 2015-16, measured against the corresponding average target from policy H1²

3.10. An updated Housing Trajectory with a base date of September 2015 is provided in Appendix D. This updates the previous June 2015 Trajectory (base date April 2015) which is included in the Local Plan and was considered as part of the examination process. The latest Housing Trajectory omits some of the completions recorded in Table 3.1, primarily because units created using permitted development rights are counted as windfalls and so excluded from the Trajectory totals.

Policy H4: Affordable and Low Cost Housing

- 3.11. Policy H4 requires all residential developments to include 40% affordable housing unless it is shown that this would make the development unviable, in which case requirements will be relaxed in order of cascading priority.
- 3.12. Table 3.3 assesses current implementation of this policy by detailing gross and net affordable housing completions for 2013-14, 2014-15 and the first two quarters of 2015-16. The net totals are shown as a proportion of total net completions for the relevant periods, and are also compared to the annual average affordable housing target implied by Policy H4 (i.e. 136 per annum and 34 per quarter, or 40 per cent of the corresponding H1 average targets).
- 3.13. The table shows that over the period 2013-15 affordable completions were a high proportion of the total. In fact, they comprised 46 per cent of all net completions over the two years, thus exceeding the 40 per cent target. The fact that total net completions remained some way below the average targets from Policy H1 nonetheless dictated that affordable completions lagged behind the corresponding average rate of delivery implied by Policy H4.

Period	Gross delivery	Losses	Net delivery	As % of H4 target					
2013-14	70	0	70	36%	136	51%			
2014-15	122	0	122	54%	136	90%			
Q1 2015-16	0	0	0	0%	34	0%			
Q2 2015-16	0	0	0	0%	34	0%			

Table 3.3: The delivery of gross and net affordable housing against the average annual/quarterly figures from policy H4³

² The completion figures in Table 3.2 are collated from data from Sussex Building Control and NHBC recording the issuing of completion certificates. Figures based on other criteria may differ.

³ The figures given in Table 3.3 have been compiled by extracting figures for affordable housing from the totals recorded in Tables 3.1 and 3.2, and, therefore, reflect the methods used to obtain those figures. Figures based on other criteria may differ.

Policy EC1: Sustainable Economic Growth

- 3.14. Policy EC1 identifies a deliverable supply of B-class employment land of 23 hectares. This is derived from the 2015 Crawley Economic Growth Assessment (EGA) Update⁴. The EGA Update estimates that on the basis of predicted levels of growth (the 'baseline' scenario) there will be demand for 58 hectares in total, including allowance for losses, during the Plan period. The identified business land supply pipeline total of 23ha falls considerably short of the identified need, but represents the available supply of land that is considered to be deliverable during the first five years of the Plan period.
- 3.15. Table 3.4 assesses implementation of this target by providing gross figures for the completion of B-class employment land in 2013-14, 2014-15, and the first two quarters of 2015-16. In keeping with the wording of the Policy, the figures represent overall land take, expressed in hectares, rather than actual employment floor space. The land take figures are derived from floor space figures using the same assumptions as in the EGA Update. A floor space/land take ratio of 4:10 is thus assumed for manufacturing and distribution uses as well as for 50% of office space, with a ratio of 2:1 being assumed for the remaining 'high density' element of office space. The gross total is measured against the average figure for the corresponding period implied by the 23ha total. As suggested by the EGA Update, this average is based on a five year period rather than the Plan period as a whole. In order to establish whether the rate of loss of B-class land to other uses is as anticipated by Policy EC1, Table 3.4 also measures losses against the loss allowance proposed in the 2015 EGA.
- 3.16. Table 3.4 shows that the rate of completion of B-class floor space was below the implied average rate in 2013-14 and 2014-15 before accelerating during the first two quarters of 2015-16, with the completion of floorspace estimated to be equivalent to 10 hectares. This would seem to underline the picture presented in the EGA, with strong demand meaning that the 23ha available business land supply identified in the Local Plan is likely to be taken up in the early years of the Plan period.
- 3.17. Further light is shed on the potential future trajectory of losses by Table 3.5. This focuses on B1 employment land, whose conversion to residential use has benefitted from permitted development rights since May 2013. The 2015 EGA identified these rights as a potential factor constraining the delivery of the 23ha target and advised further monitoring of the policy's impact on Crawley. Table 3.5 records the quantity of B1 floorspace given planning permission or prior approval to change to other uses (i.e. as opposed to completed losses) during each period, with an equivalent estimate in terms of land take provided on the basis of the EGA method detailed above.
- 3.18. Table 3.5 shows that a considerable, and growing, quantity of B1 floor space has been granted consent to change to other uses each year since 2013-14. During that year the total was comparatively low, meaning that the completed loss of 3.4 hectares of B-class land that year, shown in Table 3.4, is likely to have arisen primarily from other causes. Since that year the rate of completed losses has slowed, meaning that the average loss rate over the whole 20-month monitoring period is only marginally above that allowed for by the EGA. However, consented losses have risen year-on-year, indicating that the permitted development rights could yet make substantial inroads into the available employment land supply.

⁴ 'Crawley Economic Growth Assessment Update: Final Report', NLP: 2015.

Table 3.4: Completions and losses of B-class employment land compared with the23ha figure given in Policy EC1 and loss allowance from 2015 EGA

Period	Gross delivery (ha.)	Corresponding EC1 allowance	Gross delivery as % of EC1 allowance	Losses (ha.)	Corresponding average loss allowance (EGA)	Losses as % of average allowance
2013-14	3.82	4.6	83%	3.4	1.74	195%
2014-15	2.97	4.6	65%	0.35	1.74	20%
Q1 2015-16	2.98	1.15	259%	0.37	0.44	84%
Q2 2015-16	6.87	1.15	597%	0.29	0.44	66%

 Table 3.5: Consented B1 losses via planning permission and prior approval

Period	B1 floorspace loss consented via prior approval (m ²)	B1 floorspace lost consented via planning permission (m ²)	Total loss consented (m ²)	Estimated equivalent land take (ha.)
2013-14	4,944	216	5,160	0.77
2014-15	13,471	2,047	15,518	2.33
Q1 2015-16	14,821	0	14,821	2.22
Q2 2015-16	2,374	0	2,374	0.36

Policy EC6: Development Sites within the Town Centre Boundary

- 3.19. Policy EC6 identifies eight under-utilised sites within the Town Centre boundary whose development for appropriate uses is supported.
- 3.20. Four of these sites are identified as being appropriate for flexible mixed-use schemes comprising main town centre uses and/or residential development. The current status of these sites is as follows:
 - Parkside Car Park: the site is identified within the Local Plan as a 'broad location' for housing, and is considered suitable for development of up to 10 residential units, with ground floor retail below. Continued liaison will be required with the landowner to scope site delivery options.
 - Traders Market, High Street: the site has planning permission (CR/2014/0781/FUL) for development of 6 x ground floor retail units and 5 residential apartments above.
 - Central Sussex College (East of Tower): a planning application for a development on this site comprising 90 apartments (CR/2016/0089/FUL) was submitted in February 2016.
 - Brittingham House, Orchard Street: the site is identified within the Local Plan as a 'broad location' for housing, potentially suitable for development of approximately 24 residential units. Land assembly issues suggest that the site is likely to come forward for development in the medium to longer term (6-10 years), and continued liaison will be required with the landowner to scope site delivery options.
- 3.21. The remaining four 'Key Opportunity Sites' are identified in Policy H2 for a minimum cumulative delivery of 499 net residential units. Their current status is as follows:
 - County Buildings: The site is owned by WSCC, who are currently exploring options for redevelopment of the site as part of a mixed-use scheme.
 - Telford Place: The site is subject to a lapsed planning permission for a mixed use residential/retail development comprising of 312 dwellings (CR/2007/0114/OUT). The buildings on the site have now been demolished and the site had a temporary planning permission to provide public parking over a 24 month period until December 2015 (CR/2012/0421/FUL). The council have now acquired the site and are exploring options for redevelopment.
 - Crawley Station and Car Parks: The council is involved in active detailed pre-application discussions with the landowner for a high density residential scheme of approximately 300 apartments and station improvements.
 - Land North of the Boulevard: Prior approval was granted in May 2015 for change of use from offices to residential for 185 flats at Woodhall Duckham House and work has now started on this scheme. Other sites within this area have been subject to pre-application interest, with discussions still ongoing.

Part 4. Neighbourhood Development Plans/ Orders

- 4.1. The Localism Act 2011 created new planning policy documents called Neighbourhood Development Plans and Neighbourhood Development Orders, with associated procedures for their preparation and adoption.
- 4.2. Neighbourhood Development Plans provide a means by which, subject to various legal and policy requirements, local communities can shape the development of their immediate area. When brought into force by the Local Planning Authority they become part of the statutory development plan for their area.
- 4.3. Neighbourhood Development Orders can be used, subject to certain limitations, to grant planning permission for certain types of development within a particular area.
- 4.4. The Local Plan regulations require that details of any Neighbourhood Development Order or Plan made by an LPA be included as part of an AMR.

Matters to report

4.5. During the period covered by this AMR the council has not made any such document. The council is aware that a number of bodies are considering the option of proceeding with a Neighbourhood Development Plan or Order, and has provided support in helping them to decide whether this would be the best way of achieving their objectives.

Part 5. Duty to Cooperate

- 5.1. The Localism Act 2011 introduced a legal duty for Local Planning Authorities (LPAs) to cooperate with other LPAs as well as County Councils and other prescribed organisations on strategic planning matters, including the preparation of planning policy documents which have strategic implications, for example in the form of having significant cross-boundary impacts. In such cases, cooperation must take the form of constructive, active and ongoing engagement in relation to any relevant processes.
- 5.2. The Local Plan regulations require an AMR to give details of actions undertaken in accordance with the Duty to Cooperate.

Matters to report

- 5.3. As required by the Localism Act, the submission Local Plan was accompanied by a Duty to Cooperate Statement detailing the actions which had been undertaken in accordance with the Duty up to that point as part of the preparation of the Plan. Consideration of whether the actions detailed in the Statement satisfy the requirements of the Duty has formed a key element of the examination of the Plan. Since the council's actions in this regard have already been separately detailed and examined, the contents of the Statement are not repeated here, although Appendix C provides a summary of all relevant actions undertaken since 1 April 2013.
- 5.4. In addition to the summary provided in Appendix C, a more detailed account of the outcomes of actions which have been undertaken in accordance with the Duty to Cooperate since the submission of the Local Plan in November 2014 is set out below:
- 5.5. <u>Statement of Common Ground between Crawley Borough Council and</u> <u>Reigate and Banstead Borough Council on the submission Crawley Local</u> <u>Plan (December 2014)</u>

This statement addresses a number of cross-boundary issues arising between the two councils, including housing, employment land, retail land, and gypsy and traveller accommodation. It outlines the distinct positions of each authority in relation to each issue as well as identifying the area of agreement between them.

- 5.6. <u>Statement of Common Ground between Crawley Borough Council and Gatwick Airport Limited (GAL) (March 2015)</u> This statement highlights those elements of the Local Plan which are supported by GAL, while also drawing attention to certain areas where GAL supports the policies but seeks the incorporation within them of additional elements.
- 5.7. <u>Northern West Sussex Authorities Position Statement Update (March 2016)</u> Crawley Borough Council, Horsham District Council and Mid Sussex District Council have updated their joint Position Statement, first issued in September 2013 and subsequently revised in July 2014, February 2015 and, most recently, March 2016. This describes and justifies the terms by which the three authorities propose to work together in relation to cross-boundary planning issues, as well as the terms by which they propose to work together in the context of larger frameworks such as the Gatwick Diamond group and the Coast to Capital Local Enterprise Partnership. It further sets out actions and objectives which have jointly been agreed and/or undertaken in relation to certain key issues. The latest version shows that the outcome of the meetings between the three Northern West Sussex authorities has resulted in

increasing housing numbers in both Mid Sussex and Horsham, and a recognition of the role this plays in meeting some of Crawley's unmet needs due to the interactions across the housing market area.

- 5.8. Statement of Common Ground between Crawley Borough Council, the Environment Agency and West Sussex County Council (April 2015) This statement was issued in the course of the Local Plan examination following the publication of Non-Statutory Technical Standards for Sustainable Drainage Systems by DEFRA and associated changes to Planning Practice Guidance. It considered the implications of the announcement for Local Plan policy ENV8 (Development and Flood Risk), and concluded that the Policy – as proposed to be modified – was consistent with the new guidance.
- 5.9. <u>Statement of Common Ground between Crawley Borough Council, the</u> <u>Highways Agency (now Highways England), and West Sussex County</u> <u>Council (April 2015)</u>

This statement was prepared in order to clarify the implications for the strategic highways network of the new housing numbers proposed in the Local Plan, in response to concerns raised by the Inspector. It set out the shared view that proposed mitigation measures for junction 9 of the M23 were feasible and adequate to meet the traffic arising from the additional housing proposed.

5.10. Attendance at Local Plan examination hearings

Cooperation among the northern West Sussex authorities (Crawley, Horsham and Mid Sussex) has included attendance at Local Plan examination hearings by planning policy officers from the other authorities, including the contribution of evidence on relevant issues. This has been a feature both of the hearings relating to the Horsham District Planning Framework and those for the Crawley Borough Local Plan.

5.11. Update to Section 106 Agreement between Gatwick Airport, Crawley Borough Council and West Sussex County Council, and accompanying update to Memorandum of Understanding with Adjoining Authorities (December 2015) A new legal agreement was entered into by Gatwick Airport, Crawley Borough Council, and West Sussex County Council, for the purpose of supporting the airport's continued growth on a one runway two terminal configuration, mitigating the associated environmental impacts, and facilitating cooperation and information sharing between the parties and with other stakeholders. The agreement updated and extended the previous agreement signed in 2008. It was accompanied by a Memorandum of Understanding in which the signatories were joined by East Sussex County Council, Surrey County Council, Horsham District Council, Mid Sussex District Council, Reigate and Banstead Borough Council, Mole Valley District Council, and Tandridge District Council. This replaced an earlier MoU of 2009, and sets a framework to ensure that the interests of the different parties are accommodated in the consideration of environmental issues arising from the activities of the airport.

Appendix A: Timetables for Preparation of Documents mentioned in Crawley Local Development Scheme 2015-2018

Crawley Borough Cour	awley Borough Council's Local Development Scheme Programme 2015 – 2018																																				
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Development Plan Docur	nents						-				-	-	- 1	_		-	r r	-	-	-	<u> </u>	_	-			-	-	1 1	_	_	-	-			_	-	
Local Plan																																					
Supplementary Planning	Docu	ment	S																																		
Affordable Housing SPD																																					
Planning & Climate Change SPD																																					
Design SPD																																					
Green Infrastructure SPD																																					
Town Centre Wide SPD																																					
Development of Gatwick SPD (review)																																			Ι		
Community Infrastructure	e Lev	У	-	1	r r	_	-			_	_					-	r r	-	-	-	<u> </u>	_	-			-	-	1 1	_	_	-	-			_	-	
Charging Schedule																																					
S106 Planning Obligations Guidance Other Planning Documen																		Ι													Ι				Ι	Ι	
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Statements*																																					
Tinsley Lane Development Brief																																					
Breezehurst Drive Development Brief																																					
Land East Balcombe Road/Street Hill Dev Brief																																					
Non Statutory Consultation (R Proposed Submission (Reg 19 Submission		ultation					Exar	minati ector'	inatic ion 's Rep		eting	9					Draf Subi	t Cha nissi	rging on an	Sche d CIL	arging dule Propo Itation	osed							SPI	D Coi	rly En nsulta optior		ment				

Appendix B: Local Plan Evidence Base and Supporting Documents Produced & Published 2013 – 2015

Additional Sites Consultation (June – July 2013):

- Open Space Study Update (May 2013) JPC
- Playing Pitch Study (May 2013) JPC
- Historic Parks and Gardens Review (May 2013) Sussex Gardens Trust
- Crawley Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (Interim Draft, May 2013) CBC
- Sustainability Appraisal of the Local Plan Preferred Strategy Additional Sites Consultation Document (May 2013) CBC
- Site Allocations Consultation Reports (September 2013) CBC

Publication Consultation (September – October 2014):

- Crawley Submission Local Plan (September 2014) CBC
- Crawley Submission Local Plan Local Plan Map (September 2014) CBC
- Crawley Borough Council Community Infrastructure Levy, SHLAA and Affordable Housing Viability Assessment (October 2013) NCS
- Crawley Submission Local Plan Habitats Regulations Screening Report (November 2013) CBC
- Crawley Retail Capacity and Impact Study Update (July 2013) DTZ
- Crawley Borough Council Urban Capacity Study (2013) CBC
- Strategic Housing Land Availability Assessment (SHLAA) update (September 2013) CBC
- Crawley Water Cycle Study Update (October 2013) CBC and Amec Environment and Infrastructure UK Limited
- North West Sussex Economic Growth Assessment Emerging Findings for Crawley (November 2013) NLP
- Air quality and Emissions mitigation advice for Sussex authorities (2013) (prepared for Sussex Local Planning Authorities) (update January 2014) Sussex Air Quality Partnership
- North West Sussex Economic Growth Assessment (commissioned jointly by Crawley Borough Council, Horsham District Council and Mid Sussex District Council) (April 2014) NLP
- Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (August 2014) CBC
- Crawley Strategic Flood Risk Assessment (August 2014) CBC
- Crawley Local Plan Transport Strategy Stage 2 (August 2014) Amey Consulting

Submission (November 2014):

- Crawley Submission Modifications Draft Local Plan (November 2014) CBC
- Schedule of Main Modifications to the Submission Local Plan (November 2014) CBC
- Schedule of Minor Modifications to the Submission Local Plan (November 2014) CBC
- Crawley Submission Local Plan Local Plan Map Proposed Main Modifications (November 2014) CBC
- Crawley Submission Local Plan Sustainability Appraisal (November 2014) CBC
- Crawley Local Plan Consultation Statement (November 2014) CBC
- Crawley Infrastructure Plan (November 2014) CBC

- Crawley Duty to Cooperate Statement (November 2014) CBC
- Crawley 2030 Housing Implementation Strategy (November 2014) CBC
- Crawley Borough Council's Local Plan Local Development Scheme 2013 2014 (November 2014) CBC
- Crawley Strategic Housing Land Availability Assessment SHLAA (November 2014) CBC
- Crawley Housing Trajectory (September 2014) CBC
- North West Sussex Housing Market Area Affordable Housing Needs Model Update (commissioned jointly by Crawley Borough Council, Horsham District Council and Mid Sussex District Council) (October 2014) Chilmark Consulting
- Crawley Employment Land Trajectory (November 2014) CBC
- Establishing a Windfall Allowance for the Local Plan Period (2015-2030) (November 2014) CBC
- Topic Paper 1: Future of Gatwick Airport & Local Plan Review (November 2014) CBC
- Topic Paper 2: Housing Needs (November 2014) CBC
- Topic Paper 3: Housing Land Supply (November 2014) CBC
- Topic Paper 4: Economic Growth (November 2014) CBC
- Topic Paper 5: Unmet Needs (November 2014) CBC
- Topic Paper 6: Green Infrastructure (November 2014) CBC
- Topic Paper 7: Climate Change (November 2014) CBC

Post-Submission:

- CBC/001 Written Statement Matter 1: Legal Compliance and Procedural Matters (February 2015) CBC
- CBC/002 Written Statement Matter 2: Overall Spatial Development Strategy (February 2015) CBC
- CBC/003 Written Statement Matter 3: Housing; Issue 1: Objectively Assessed Housing Needs (February 2015) CBC
- CBC/004 Written Statement Matter 3: Housing; Issue 2: Housing Supply (February 2015) CBC
- CBC/005 Written Statement Matter 3: Housing; Issue 3: Housing Delivery (February 2015) CBC
- CBC/006 Written Statement Matter 3: Housing; Issue 4: Housing Mix (February 2015) CBC
- CBC/007 Written Statement Matter 4: Economy, Employment and Retail; Issue 1: Objectively Assessed Employment Needs (February 2015) CBC
- CBC/008 Written Statement Matter 4: Economy, Employment and Retail; Issue 2: Employment Land Supply (February 2015) CBC
- CBC/009 Written Statement Matter 4: Economy, Employment and Retail; Issue 3: Main Employment Areas and Gatwick Airport (February 2015) CBC
- CBC/010 Written Statement Matter 4: Economy, Employment and Retail; Issue 4: Retail Development and the Town Centre (February 2015) CBC
- CBC/011 Written Statement Matter 5: Character and Environment; Issue 1: Crawley's Character (February 2015) CBC
- CBC/012 Written Statement Matter 5: Character and Environment; Issue 2: Environmental Protection, Open Space and Sustainable Construction (February 2015) CBC
- CBC/013 Written Statement Matter 6: Infrastructure Provision, Implementation and Monitoring (February 2015) CBC
- Crawley Economic Growth Assessment Update Final Report (February 2015) NLP

- Crawley Local Plan Employment (Business) Land Trajectory 2015-2030: Guidance Note (February 2015) CBC
- Crawley Viability Assessment Update (February 2015) NCS
- Objective Assessment of Crawley's Housing and Employment Needs (February 2015) Chilmark Consulting
- Objective Assessment of Crawley's Housing and Employment Needs (March 2015 update) Chilmark Consulting
- CBC/014 Written Response to DCLG Publication of 2012-Based Household Projections (March 2015) CBC
- CBC/015 Written Response to Policy GAT3: Gatwick Airport Related Car Parking (March 2015) CBC
- Housing Market Signals Sales, Transactions and PRS Note (March 2015) Chilmark Consulting
- CBC/033 Statement on Land East of Street Hill (March 2015) DGC (Historic Buildings) Consultants
- Crawley Whole Plan and CIL Viability Assessment and appendices (April 2015) NCS
- Crawley Borough Council Individual Viability Assessments (April 2015) NCS
- Housing Trajectory (April 2015) CBC
- CBC/055 Written Statement on Changes to Planning Practice Guidance: Housing for Older People (April 2015) CBC
- Local Plan Built Up Area Boundary Review 2015 (June 2015) CBC
- Strategic Housing Land Availability Assessment (June 2015) CBC
- Crawley 2030: Crawley Borough Local Plan 2015 2030 Modifications Consultation Draft (June 2015) CBC
- Crawley Sustainability Appraisal/Strategic Environmental Assessment; Sustainability Report for the Modifications Local Plan (June 2015) CBC
- Consultation Statement Update (August 2015) CBC
- CBC/060 Written Response to Inspector's Note on Wind Energy (July 2015) CBC
- CBC/061 Written Response on High Court Judgement and Revision to PPG and Implications for Policy H4: Affordable and Low Cost Housing (August 2015) CBC
- Residential Individual Viability Assessments (August 2015) NCS

Post-Adoption:

- Adoption Statement (December 2015) CBC
- Crawley 2030: Crawley Borough Local Plan 2015 2030 (December 2015) CBC
- Local Plan Map (December 2015) CBC
- Sustainability Appraisal/Strategic Environmental Assessment Post Adoption Statement (December 2015) CBC
- Sustainability Appraisal/Strategic Environmental Assessment (December 2015) CBC

Appendix C: Summary of Duty to Cooperate Actions 2013-2015

Key:

Bold, Black Text: National Changes

Bold, Blue Text: Duty to Cooperate Agreements & Documents Blue Text: Joint Evidence Base Documents Italic, Green Text: Duty to Cooperate Member meetings Italic, Black Text: Duty to Cooperate Officer meetings Bold, Orange Text: Local Plan Stages Orange Text: Local Plan pre-formal stages consultation

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

Milestone	Date
Gatwick Diamond GROW Strategy Project Group	10 April 2013
Gatwick Diamond Local Authorities Portfolio Holders	16 April 2013
Gatwick Airport Consultative Committee	16 April 2013
Gatwick Diamond GROW Strategy Project Group	23 April 2013
Northern West Sussex Authorities Planning Officers:	24 April 2013
Position Statement	-
Gatwick Airport Transport Forum Steering Group	24 April 2013
Crawley/Southern Water	2 May 2013
Northern West Sussex Authorities Planning Officers: EGA	10 May 2013
Northern West Sussex Authorities Planning Officers: EGA	13 May 2013
Crawley/Mid Sussex: Strategic Urban Extensions	22 May 2013
Local Plan Crawley 2029 Additional Sites Consultation	3 June 2013
Starts	
West Sussex Planning Policy Officers Group	7 June 2013
West Sussex Local Flood Risk Management Strategy	10 June 2013
Crawley/Mid Sussex: MSDC District Planning	11 June 2013
Gatwick Officers Group	11 June 2013
Northern West Sussex Authorities Planning Officers: EGA	12 June 2013
Northern West Sussex Authorities Planning Officers:	14 June 2013
Position Statement	
Crawley Borough Council response to Mid Sussex District	17 June 2013
Plan Proposed Submission consultation	
Gatwick Diamond GROW Strategy Project Group	18 June 2013
Green Infrastructure Network	27 June 2013
Local Plan Crawley 2029 Additional Sites Consultation	1 July 2013
Ends	
Northern West Sussex Authorities Planning Officers:	3 July 2013
Position Statement	
Northern West Sussex Authorities Planning Officers: EGA	4 July 2013
West Sussex Chief Planning Officer Group	5 July 2013
Northern West Sussex Chief Executives Strategic	8 July 2013
Planning	
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
Crawley/Horsham: Horsham Preferred Option Local Plan	1 August 2013
Coastal & Northern West Sussex Authorities	9 August 2013

Northern West Sussex Authorities Planning Officers: 13 August 2013 Position Statement 21 August 2013 Gatwick Difficers Group 21 August 2013 Gatwick Difficers 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 9 September 2013 LA Leaders 11 September 2013 Gatwick Joint Local Authorities Planning Officers: Mid 11 September 2013 Gatwick Airport Noise and Track Monitoring Advisory 12 September 2013 Group Crawley/Mid Sussex: attendance at Mid Sussex District 16 September 2013 Plan Exploratory Meeting Gatwick Airport Transport Forum Steering Group 18 September 2013 Gatwick Airport Transport Forum Steering Group 18 September 2013 Viability Assessment: Community Infrastructure Levy, Affordable Housing and Local Plan viability, Nationwide 17 October 2013 Crawley Borough Council response to Horsham District Framework Preferred Strategy consultation 17 October 2013 ADNB Officer Steering Group 21 October 2013 Active Airport Consultative Committee 17 October 2013	Milestone	Date
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Gatwick Airport Transport Forum Steering Group 8 January 2014		7 Januarv 2014
	Horsham Duty to Cooperate Workshop	9 January 2014

Milestone	Date
West Sussex Chief Planning Officer Group	9 January 2014
Gatwick Diamond Management Board Meeting	21 January 2014
Biodiversity Record Centre	21 January 2014
Crawley/Adur/Horsham/Worthing: Housing Numbers	22 January 2014
Gatwick Diamond Local Authorities Portfolio Holders	22 January 2014
Gatwick Diamond Local Authorities Leaders	22 January 2014
West Sussex Local Authorities Leaders	January 2014
Gatwick Airport Sub-Groups: Housing and Employment	27 January 2014
Gatwick Airport Sub-Groups: Transport Working Group	29 January 2014
Gatwick Diamond Leaders Growth Strategy Meeting	30 January 2014
Gatwick Airport Consultative Committee	30 January 2014
Northern West Sussex Authorities Planning Officers: EGA	10 February 2014
Crawley Borough Council response to Coast to Capital	11 February 2014
LEP Strategic Economic Plan	
Crawley Borough Council response to Mid Sussex Duty to	17 February 2014
Cooperate Gypsy and Traveller Request	
Gatwick Airport Noise and Track Monitoring Advisory	27 February 2014
Group	
Crawley/Reigate and Banstead	28 February 2014
Horsham Duty to Cooperate Workshop	4 March 2014
Gatwick Diamond GROW Strategy Project Group	5 March 2014
Planning Practice Guidance Launched	6 March 2014
West Sussex Planning Policy Officers Group	7 March 2014
Copthorne Neighbourhood Plan Stakeholder Workshop	10 March 2014
Northern West Sussex Senior Planning Officers	11 March 2014
Gatwick Airport Sub-Groups: Transport Working Group	19 March 2014
Gatwick Diamond Local Authority Portfolio Holders	25 March 2014
Gatwick Officers Group	26 March 2014
Gatwick Joint Local Authorities	26 March 2014
Gatwick Airport Sub-Groups: Noise	27 March 2014
Northern West Sussex: Strategic Sites & Broad Location	1 April 2014
SHLAA	•
Northern West Sussex: Housing Needs	4 April 2014
Coast to Capital Local Enterprise Partnership	4 April 2014
Strategic Economic Plan (March 2014) Published	0.4. // 0.0.4.4
Crawley/Crawley CCG	8 April 2014
Horsham Issue draft Duty to Cooperate Workshops	9 April 2014
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)	
West Sussex Local Authorities Leaders Event	9 April 2014
Gatwick Airport Transport Forum Steering Group	9 April 2014
Gatwick Airport Consultative Committee	10 April 2014
Northern West Sussex: EGA	22 April 2014
West Sussex Chief Executives Meeting	23 April 2014
Publication of Economic Growth Assessment (EGA), NLP	23 April 2014
Gatwick Diamond Management Board Meeting	29 April 2014
West Sussex County Joint Leaders	7 May 2014
Northern West Sussex: Strategic Sites & Broad Location	7 May 2014
SHLAA	7 Way 2014

Milestone	Date
Crawley/Horsham/WSCC: Transport Modelling	7 May 2014
Gatwick Diamond GROW Strategy Project Group	12 May 2014
West Sussex Chief Planning Officers Group	13 May 2014
Gatwick Airport Noise and Track Monitoring Advisory	13 May 2014
Group	,
Crawley Borough Council officer comments to HDC draft	15 May 2014
Duty to Cooperate Report	-
Northern West Sussex: Strategic Sites & Broad Location	21 May 2014
SHLAA	27 1 / 2011
Northern West Sussex: SHMA Inception Meeting	27 May 2014
West Sussex Chief Executives Meeting	2 June 2014
Gatwick Officers Group	4 June 2014
West Sussex Planning Policy Officers Group	6 June 2014
Gatwick Diamond Overview Forum Meeting	13 June 2014
Gatwick Diamond GROW Strategy Project Group	18 June 2014
Gatwick Airport Sub-Groups: Air Quality	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	26 June 2014
District Council Duty to Cooperate formal request	20 00110 2011
Final HDC Duty to Cooperate Report Issued: Horsham	26 June 2014
District Council & 'Coast to Capital' LEP Local	
Authorities, March 2014, Incorporating Strategic	
Issues into Local Plans – Summary Report of Duty to	
Cooperate Workshops (PAS)	
Northern West Sussex: Strategic Sites & Broad Location	1 July 2014
SHLAA	
Gatwick Area Airports Commission Visit	9 July 2014
Gatwick Airport Sub-Groups: Housing and Employment	9 July 2014
Crawley/Horsham/WSCC/West of Ifield Consortium	15 July 2014
Consultants	-
Northern West Sussex Senior Planning Officers: Position	16 July 2014
Statement Update	
Gatwick Airport Sub-Groups: Transport Working Group	17 July 2014
Gatwick Airport Transport Forum Steering Group	17 July 2014
Northern West Sussex: SHMA	18 July 2014
Gatwick Airport Consultative Committee	24 July 2014
Gatwick Diamond GROW Strategy Project Group	28 July 2014
Crawley Borough Council response to the Tandridge	28 July 2014
District Council Joint SHMA request	-
Horsham and Crawley Joint Climate Change	5 August 2014
Statement of Agreement, Crawley Borough Council	
and Horsham District Council	
Northern West Sussex Strategic Sites & Broad	5 August 2014
Locations SHLAA Appendix Northern West Sussex Position Statement Revised	7 August 0044
July 2014: signed by LA Planning Portfolio Holders	7 August 2014
Northern West Sussex: Strategic Sites	14 August 2014
Email out draft CBC DtC Statement to all Prescribed	19 August 2014
Bodies for comment and fact-checking	. e / lagaet 2011
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Milestone	Date
Formal Letter to all Neighbouring Authorities to clarify	19 August 2014
Crawley Borough level of unmet needs	22 August 2014
Crawley/Brighton and Hove: Strategic Planning & Unmet Needs	22 August 2014
Crawley Borough submission draft Local Plan 2015 -	1 September 2014
2030 Publication Consultation Starts	
Gatwick Diamond Representation at Further Alterations of	2 September 2014
London Plan Examination Hearings Session 2: Housing	
Northern West Sussex: SHMA	5 September 2014
Crawley/Mole Valley: Crawley Local Plan & Planning	9 September 2014
Policy in Mole Valley	
West Sussex Planning Policy Officers Group	12 September 2014
Crawley/West Sussex County Council: Transport	18 September 2014
Modelling & Infrastructure	
West Sussex County Chief Executives	22 September 2014
Gatwick Diamond GROW Strategy Project Group	22 September 2014
CBC signed Lewes District Council's Duty to	30 September 2014
Cooperate Statement of Common Ground	
Crawley/Mid Sussex: Objectively Assessed Housing	1 October 2014
Needs	
Crawley/Horsham: Horsham District Planning Framework	1 October 2014
Crawley/Reigate and Banstead: Crawley Local Plan	8 October 2014
CBC response to Tandridge District Council's Duty to	9 October 2014
Cooperate Scoping Report	42 October 2014
Crawley Borough submission draft Local Plan 2015 –	13 October 2014
2030 Publication Consultation Ends Gatwick Diamond Joint Letter Response to London	29 October 2014
Infrastructure Plan	29 OCIODEI 2014
Bedford 51 Joint Letter, on behalf of 60 local authorities in	31 October 2014
the South East, Response to London Infrastructure Plan	
Northern West Sussex Authorities Planning Officers:	31 October 2014
Horsham District Planning Framework	
West Sussex County Joint Leaders and Chief Executives	3 November 2014
Crawley/Horsham: attendance at Horsham District	4 November 2014
Planning Framework Examination Hearing	
Crawley/Horsham: attendance at Horsham District	5 November 2014
Planning Framework Examination Hearing	
Crawley/Horsham: attendance at Horsham District	14 November 2014
Planning Framework Examination Hearing	
Crawley/West Sussex County Council/Highways Agency	18 November 2014
Gatwick Diamond Overview Forum Meeting	21 November 2014
Submission of Crawley 2030: Local Plan 2015 – 2030	26 November 2014
for Examination	
Gatwick Officers Group	27 November 2014
Gatwick Diamond GROW Strategy Project Group	27 November 2014
Crawley/Mid Sussex: Sustainability Assessment of Unmet	8 December 2014
Needs	
Circulation of draft HEDNA consultant brief: email to	11 December 2014
adjoining authorities for comments	
West Sussex Planning Policy Officers Group	12 December 2014
Comments received from Mole Valley District Council	15 December 2014
on draft HEDNA consultant brief	

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 West Sussex Chief Executives/Gatwick Airport Limited 7 January 2015 Gatwick Officers Group 7 January 2015 Gatwick Joint Local Authorities (GOG Members) 13 January 2015 Vest Sussex Planning Policy Officers Group 13 January 2015 Crawley Borough Council response to Mid Sussex District 16 January 2015 Plan Regulation 18 consultation 20 January 2015 Gatwick Diamond Management Board Meeting 20 January 2015 Grawley/Mid Sussex Khid Sussex Numbers 4 February 2015 West Sussex Chief Planning Officer Group 6 February 2015 Grawley/Reigate & Banstead: Strategic Employment 10 February 2015 Crawley/Reigate & Banstead: Strategic Employment 10 February 2015 Crawley/Mid Sussex Horsham: NWS Position Statement 12 February 2015 Crawley/Reigate & Banstead: Strategic Employment 16 February 2015 Crawley/West Sussex County Council: CBLP Examination 16 February 2015 Crawley/Reigate & Banstead: Strategic Project Group 26 February 2015	Milestone	Date
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West Sussex County Council Statement of Common GroundGatwick Diamond Management Board Meeting28 April 2015Crawley/Horsham: Strategic Planning Update Meeting29 April 2015Crawley Borough Council response to Horsham District12 May 2015		24 April 2015
Gatwick Diamond Management Board Meeting28 April 2015Crawley/Horsham: Strategic Planning Update Meeting29 April 2015Crawley Borough Council response to Horsham District12 May 2015	West Sussex County Council Statement of Common	
Crawley/Horsham: Strategic Planning Update Meeting29 April 2015Crawley Borough Council response to Horsham District12 May 2015	Ground	
Crawley Borough Council response to Horsham District 12 May 2015		28 April 2015
Crawley Borough Council response to Horsham District 12 May 2015		
Planning Framework Modifications consultation	Crawley Borough Council response to Horsham District	12 May 2015
	Planning Framework Modifications consultation	

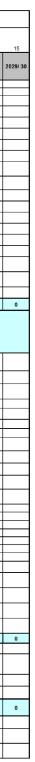
Milestone	Date
Crawley Borough Council response to Reigate & Banstead	12 May 2015
Borough Council Development Management Plan Duty to	
Cooperate Scoping Statement	
Examination Hearing Sessions for Crawley 2030:	18 May 2015
Local Plan 2015 – 2030	
Gatwick Officers Group	20 May 2015
Gatwick Diamond GROW Strategy Project Group	20 May 2015
Northern West Sussex Authorities Planning Officers: Mid	4 June 2015
Sussex District Plan Housing Numbers 2012-Based	
Household Projections	
Coast to Capital Local Enterprise Partnership	4 June 2015
Infrastructure Study Findings; West Sussex & Gatwick	
Diamond Infrastructure Study Findings; Utilities	
Infrastructure Partners; & Horsham Duty to Cooperate	
Workshop	
West Sussex County Chief Executives	8 June 2015
Crawley Borough Council informal officer response to	8 June 2015
Tandridge District Council on Green Belt Review Duty to	
Cooperate Workshop	
Gatwick Diamond Overview Forum Meeting	19 June 2015
West Sussex Planning Policy Officers Group	30 June 2015
Crawley/Horsham: attendance at Horsham District	3 July 2015
Planning Framework Examination Hearing: Crawley	
Housing Numbers & Unmet Needs	
Gatwick Diamond Management Board Meeting	14 July 2015
Gatwick Officers Group	14 July 2015
Gatwick Diamond GROW Strategy Project Group	14 July 2015
Crawley/Reigate & Banstead/Mid Sussex/Horsham: RBBC	14 July 2015
Development Management DPD Crawley/Mid Sussex/Horsham: Mid Sussex District Plan &	22 10/02/15
NWS Position Statement	22 July 2015
Crawley Borough Council response to Mid Sussex District	24 July 2015
Plan Regulation 19 Submission consultation	21000.92010
Crawley Borough Council officer comments to West	18 August 2015
Sussex Infrastructure Study Presentations	-
Gatwick Officers Group	1 September 2015
Gatwick Diamond Strategy Project Group	1 September 2015
West Sussex County Chief Executives	7 September 2015
Gatwick Joint Local Authorities	7 September 2015
West Sussex Planning Policy Officers Group	8 September 2015
Crawley/Horsham: Strategic Planning	21 September 2015
Crawley/Environment Agency: Supplementary Planning	23 September 2015
Documents	
Tandridge Reg 18 Local Plan Meeting	30 September 2015
Crawley/Mid Sussex: Strategic Development Site – Pre-	15 October 2015
Application	
Gatwick Diamond Strategy Project Group	20 October 2015
Gatwick Diamond Management Board Meeting	20 October 2015
Crawley/Mid Sussex: Mid Sussex District Plan & Strategic	11 November 2015
Allocation	
Coastal West Sussex Local Strategic Statement Workshop	12 November 2015
West Sussex County Chief Executives	25 November 2015

Milestone	Date
Gatwick Diamond Overview Forum Meeting	27 November 2015
Gatwick Diamond Initiative Prosper Forum	1 December 2015
Gatwick Diamond Strategy Project Group	2 December 2015
Crawley/Mid Sussex: Mid Sussex District Plan & Strategic	3 December 2015
Allocation	
West Sussex Planning Policy Officers Group	8 December 2015
Crawley/Mid Sussex: Mid Sussex District Plan & Strategic	7 January 2016
Allocation	
Crawley Borough Council response to Mid Sussex District	15 January 2016
Plan Regulation 19 Focused Amendments consultation	
Gatwick Airport Transport Forum Steering Group	21 January 2016
CBC feedback to MSDC Transport Modelling draft	22 January 2016
Consultant's Brief	
Gatwick Officers Group	26 January 2016
Gatwick Airport Consultative Committee (GATCOM)	28 January 2016
Crawley/Mid Sussex: Mid Sussex District Plan & Strategic	2 February 2016
Allocation	
West Sussex Planning Policy Officers Group	8 March 2016
Arun District Council Duty to Cooperate Workshop	14 March 2016
Northern West Sussex Position Statement Revised	15 March 2016
February 2015: signed by LA Planning Portfolio	
Holders	
Crawley Borough Council response to Tandridge District	17 March 2016
Local Plan Regulation 18 Issues and Approaches	
consultation	
Gatwick Diamond Strategy Project Group	31 March 2016

Appendix D: Housing Trajectory update (base date 30 September 2015)

												Past Year	Current Year					Anticipa	ted Delive	ry of Dwo	ellings 201	5-2030 (L	Local Plan	1)			
											Completed	Completed	Anticipated Completed 1	2	3	4	5	6	7	8	9	10	11	12	13	14	
	Planning Application Reference	site Address	Neighbourhoo d	Issue Date	Lapses Date	Approved or Allocated (gross)	Proposed Losses	Approved or Allocated (net)	Total Completed (net)	Total Outstanding Commit (gross)	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	20
per	CR/2010/0266/FUL	100 - 104 THREE BRIDGES ROAD	Three Bridges	26/08/2010	01/10/2010	14	1	13	14	0	14																Ŧ
otem	CR/2011/0323/ARM CR/2010/0703/FUL	WOODHALL & LITTLE PADDOCKS LAND AT DORSTEN SQUARE	lfield Bewbush	05/09/2011 27/09/2011	05/09/2014 27/09/2014	27 21		27	27 21	0	1 21												\vdash	<u> </u>	\vdash		+
) Sel	CR/2011/0678/FUL	DEERSWOOD LODGE SITE, IFIELD	lfield	11/04/2012	11/04/2015	14		14	14	0	14														\vdash		+
at 3(CR/2011/0677/FUL	CROSSWAYS, BALCOMBE ROAD	Pound Hill	30/08/2012	30/08/2015	7	1	6	7	0		7													\vdash		+
sion	CR/2012/0441/FUL	OAK, MAPLE & BEECH HOUSES, WATERSIDE CLOSE	Bewbush	30/01/2013	30/01/2016	14		14	14	0	14																+
in in its second	CR/2012/0557/FUL	ALPINE WORKS, OAK ROAD	Southgate	01/02/2013	01/02/2016	6	1	6	6	0			6														+
6 B	CR/2012/0324/FUL	CRAWLEY COMMUNITY CHURCH, 40 SPRINGFIELD	Southgate	18/03/2013	18/03/2016	8		8		8			8														+
unin	CR/2013/0388/FUL	SCOUT GROUP AND GUIDES HALL LARK RISE	Langley Green	24/09/2013	24/09/2016	9		9	9	0		9															\top
ant Pla								9	9			9											\vdash	<u> </u>	\vdash		+
axtar 15 (1	CR/2012/0492/FUL	LANGLEY GREEN YOUTH CENTRE, LARK RISE	Langley Green	13/12/2012	13/12/2016	9			9	0		9											\vdash	<u> </u>	──┨		+
Aith 20	CR/2012/0394/FUL	KINGSLAND COURT, THREE BRIDGES ROAD	Three Bridges	13/11/2013	13/11/2016	10		10		10			10										\vdash	<u> </u>	──┨		+
its)	CR/2013/0536/FUL CR/2013/0632/RG3	6 - 10 IFIELD ROAD BRUNEL HALL, BRUNEL PLACE	West Green	05/02/2014	05/02/2017 12/02/2017	14 22	-	14		14 0			14										\vdash	<u> </u>	+		+
59 nr			Northgate	03/04/2007		6		6	22 6	-	6	22											\vdash	<u> </u>	\vdash		+
9	CR/2007/0820/FUL CR/2013/0576/FUL	LAND OFF CLITHEROW GARDENS AND MALTHOUSE RD 110-112 SPENCERS ROAD	Southgate West Green	13/05/2014	IMPLEMENTED 13/05/2017	10		10	0	0	0		10	<u> </u>									\vdash	⊢ '	──┨		+
sites	CR/2013/05/62/FUL	19 - 21 QUEENSWAY	Northgate	03/03/2014	03/03/2017	10		10	10	0		10	10											<u> </u>	──┨		+
s Bui		Shaw House formation of additional floor (pursuant to							10			10											\vdash	<u> </u>	├──┨		+
snop	CR/2014/0811/FUL	CR/2014/0159/PA3)	West Green	05/02/2015	05/02/2018	7		7		7				7										<u> </u>	\square		\perp
de F	CR/2015/0110/FUL	40 Queens square	Northgate	13/05/2015	13/05/2018	6		6		6				6									1 1	'			
Ľ	CR/2015/0137/FUL	21 Broad Walk	Northgate	02/06/2015	02/06/2018	7		7		7				7													+
			Tot	al Large Sites wi	th PP (6-29 units)	221	2	219	159	62	70	57	48	20	0	0	0	0	0	0	0	0	0	0	0	0	
I Housing 6 units or 1 with PP (B)	(100% of small sites commenced = 31 net plus 45% of commitment (54) = 26 = 57 units					57	3			54	29	19	27	16	11	0	0										
Small Sites (f	Small Sites deliverable spread over 5 years		Total Small H	lousing Sites wit	h PP (5 or less)																						
(erable,	CR/2011/0189/OUT CR/2014/0317/NCC	FAIRFIELD HOUSE, WEST GREEN LANE	West Green	05/10/2011	05/10/2014	92	0	92		92				92													\perp
Deliv	CR/2012/0253/ARM	WSCC Professional Centre, Furnace Drive	Furnace Green	29/10/2012	29/10/2015	76	0	76	76	0	59	17											\square	<u> </u>	\vdash		+
are	CR/2012/0446/ARM/ CR/2014/0686/NCC	5 - 7 BRIGHTON ROAD	Southgate	19/11/2012	19/11/2015	48		48		48				48									1 1	1 '			
that	CR/2013/0066/FUL	BREEZEHURST DRIVE	Bewbush	07/05/2013	07/05/2016	112		112	112	0		112															
H2)	CR/2013/0015/FUL	15 - 29 BROADWAY UPPER FLOORS	Northgate	08/08/2013	08/08/2016	57		57		57						57											
olicy	CR/2012/0223/FUL		Southgate	17/12/2013	17/12/2016	59		59		59					59	70	70						\square	<u> </u>	\vdash		_
e (Pe	CR/2013/0517/OUT CR/2012/0357/ARM	SOUTHERN COUNTIES, (27 - 45 IFIELD ROAD)	West Green	04/03/2014	04/03/2017	218		218		218			400	000	70	70	78	475	175	175	175	475			\vdash		+
(C)	CR/2013/0610/ARM	FORGE WOOD (FORMERLY THE NORTH EAST SECTOR)	Pound Hill	14/03/2014	14/03/2017	1900		1900	32	1868			100	200	200	200	200	175	175	175	175	175	95	30	\vdash		+
NIOCE	CR/2014/0046/FUL	Land Adj to Langley Green Primary School, Langley Drive	Langley Green	06/11/2014	06/11/2017	30		30		30			30										\vdash	⊢′	\vdash		+
ing /	Allocation	IFIELD COMMUNITY COLLEGE	lfield			125		125		125				65	60								\square	<u> </u>	\vdash		_
snop	Allocation	TINSLEY LANE	Three Bridges			120		120		120						60	60						1 1	'			
(ey ł	Allocation	LAND ADJ DESMOND ANDERSON	Tilgate			100		100		100					28	72											
lan	Allocation	KILNMEAD CAR PARK	Northgate			40		40		40					40												+
les H	Allocation	GOFFS PARK DEPOT	Southgate			30		30		30					30									<u> </u>			
۲	Allocation	FORMER TSB SITE, RUSSELL WAY OAKHURST GRANGE	Three Bridges Southgate			40		40		40 55					20 27	20 28							├ ──┤	<u> </u>	├──┨		+
Man Ising ons H2) re able	Allocation	BREEZEHURST DRIVE PLAYING FIELDS	Bewbush			65		65		65								32	33								
D al Planar at arc alopa	Allocation	LONGLEY BUILDING, EAST PARK Henty Close, Bewbush	Southgate Bewbush			48 24	-	48		48 24								12	12	48				<u> </u>			+-
(Police Police Local Local Local Local Allocation Choice Police Line Line Line Line Line Line Line Lin	Allocation	Land East of St Hill	Pound Hill			15		15		15								15	12						\vdash		+
1 Town +	Allocation	TELFORD PLACE / HASLETT AVENUE	Three Bridges			99		99		99					99											·	t
Local Plan Key Centre Opportu Sites (Policy H2) units) (E)	Allocation	Crawley Station and Car Parks	Northgate	-		308		308		308						90	87	131						ļ'			\perp
al Ple unit	Allocation	County Buildings	Northgate			50		50		50						25	25										
C Ce Sites	Allocation	Land N of the Boulevard	Northgate	Total K	ey Housing Sites	50 3761	0	50 3254	220	50 3034	59	129	130	405	633	622	450	365	50 270	223	175	175	95	30	0	0	
ast 5+		102 - 112 London Road & 2 -4 Tushmore Lane	Northgate	Total I	cy nousing ence	44	8	36	220	44	55	125	130	403	000	440	450	44	210	225	113	113					+
Broad Location (East of London Road) 6+ Units (F)		116 - 136 London Road	Northgate			64	11	53		64										32	32						T
Unit		138 - 144 London Road	Northgate		1	27	4	23	1	27													27				\top
3roac 3f Lo		21, 25, 27 & 29 Tushmore Lane	Northgate			63	4	59		63			1								30	33					+
				d Logation /Erst	of London Bo - 4															20						•	
é		Central Sussex College (East of Tower)	Total for Broad	u Location (East	of London Road) 198 36	27	171 36	0	198 36	0	0	0	0	0	0	0	44 36	0	32	62	33	27	0	0	0	+
Cen		Fire Station, Ifield Avenue	West Green			48		48		48			1											48			+
n Town its (F)		Brittingham House, Orchard St	West Green			24		24		24											24		┢━━┥	<u> </u>	+		+
nt stir		Pritangham House, Orchard or	West Green			24		24		24											24		L				

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												Past Year	Current Year					Anticipa	ated Delive	ery of Dwr	ellings 201	15-2030 (I	Local Plar	1)		
											Completed	Completed	Anticipated Completed 1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Planning Application Reference	Site Address	Neighbourhoo d	Issue Date	Lapses Date	Approved or Allocated (gross)	Proposed Losses	Approved or Allocated (net)	Total Completed (net)	Total Outstanding Commit (gross)	2013/14	2014/15	2015/16	2016/1	7 2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24					2028/29
ocatic 6+ ur		1-7 Pegler Way	West Green			20		20		20												20				
ad Lo		Parkside Car Park	Northgate			10		10		10											10					
ä		The Old Vicarage, Church Walk	Northgate			18		18		18										\square	\square	18				
			Total f	for Broad Locati	on (Town Centre)) 156	0	156	0	156	0	0	0	0	0	0	0	36	0	0	34	38	0	48	0	0
tion (Forge orth East idual Land ts (F)		Land Adj to Steers Lane	Pound Hill			75		75		75													75			
Broad Location (Forg Wood North East Sector Residual Land 6+ Units (F)		Land to the Southeast of Heathy Farm, Balcombe Road	Pound Hill			75		75		75														75		
			Total for Br		orge Wood North or Residual Land)		0	150	0	150	0	0	0	0	0	0	0	0	0	0	0	0	75	75	0	0
e (6 -		Traders Market, High Street	West Green			6		6		6					6											
itable SHLAA Sites are Deliverable (6 - 29 units) (G)		Oak Tree Filling Station, 114 London Road	Northgate			17		17		17					17											
Suitable that are 29	CR/2014/0777/FUL	Gales Place	Three Bridges	18/06/2015	18/06/2018	13		13		13				13												
				Total Deliver	able SHLAA Sites	\$ 36	0	36	0	36	0	0	0	13	23	0	0	0	0	0	0	0	0	0	0	0
AA 5-29		2 - 12 Friston Walk	lfield			21	6	15		21								21								
(H)		Rear Gardens, Dingle Close/Ifield Road	West Green			18		18		18								18								
Suitable SHLAA Sites that are Developable (6-29 Units) (H)		Rear Gardens, Snell Hatch/Ifield Road	West Green			15		15		15								15								
<u>B</u> N		Ambulance Station, Ifield Avenue	Langley Green			16		16		16											16					
				Total Develop	able SHLAA Sites	5 70	6	64	0	70	0	0	0	0	0	0	0	54	0	0	16	0	0	0	0	0
Housing Windfalls (includes allowance for prior approvals)				т	otal for Windfalls	825	0	825	0	825	0	0	55	55	55	55	55	55	55	55	55	55	55	55	55	55

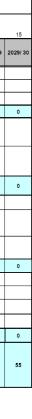
Gross Housing Delivery for All Categories	5474	38	5235	122	5114	158	205	260	509	722	677	505	554	325	310	342	301	252	208	55	55	
			Total Losses	for All Catego	ries per annum	2	3	1	0	0	0	6	8	24	0	4	0	4	0	0	0	
			Net Housing D	Delivery for Al annum	l Categories per	156	202	259	509	722	677	499	546	301	310	338	301	248	208	55	55	

Gross Approvals/Allocations	5534
minus Proposed Loses	38
equals	5496 net units
minus net completions 13/14	156 net units
minus net completions 14/15	202 net units
equals	5138 net units at 30 September 2015

Notes :

To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achieveable with a realistic prospect that housing will be delivered on site within 5 years and in particular, that development in viable (NPPF, para 47)
 To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged (NPPF, para 47)

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