

## 1. List of Parties involved

- Crawley Borough Council (CBC)
- Mid Sussex District Council (MSDC)

## 2. Signatories



**Date 11/07/23**  
**Crawley Borough Council**  
**Clem Smith, Head of Economy and Planning**



**Date 27/07/23**  
**Mid Sussex District Council**  
**Head of Service**

## 3. Strategic Geography

The Statement of Common Ground (SOCG) covers the local authority areas of Crawley Borough Council (CBC) and Mid Sussex District Council (MSDC) and is a sound basis for co-operation on strategic cross boundary matters identified in this SOCG.

Crawley and Mid Sussex are located within the county of West Sussex and share a common boundary. The authorities are separated to the east/south east of Crawley by the A23/M23 strategic highway.

Both authorities are located within the Gatwick Diamond sub-region and within the Coast to Capital Local Enterprise Partnership (LEP) Area and work cooperatively across the West Sussex and Greater Brighton strategic planning area. The two authorities have a long history of positive and active engagement on cross-boundary matters, including through Statements of Common Ground agreed as part of the Northern West Sussex Authorities, along with Horsham District Council (initially agreed in September 2013 and revised in July 2014, February and March 2015, March 2016 and May 2020, which included West Sussex County Council) as well as a bilateral SoCG between the two authorities reached through the Mid Sussex Site Allocations Development Plan Document, agreed in May 2020 (adopted 2022). The Northern West Sussex Statement of Common Ground is being updated and a separate Housing-specific Statement of Common Ground is being prepared and agreed between the three Northern West Sussex district/borough authorities.

The map below shows the authorities in relation to each other (i.e. indicated with the red administrative boundaries).



A scale map of the Gatwick Diamond Authorities is provided in Appendix A.

#### 4. Strategic Matters

Both parties have a collective and shared view of the long term priorities and have identified specific strategic objectives:

- to work collaboratively on Housing Need, including affordable housing, self- and custom-build and Gypsy, Traveller and Travelling Showpeople needs, across the Northern West Sussex Housing Market Area;
- Economic Growth;
- to continue and develop the existing shared approach to Gatwick Airport, having regard to its economic and social benefits, and also its environmental impacts including those relating to air quality, noise pollution, and surface access;

- to develop an agreed position on the transport impacts of Local Plan proposals, in particular from strategic allocation sites close to authority boundaries;
- to establish a common and agreed position on secondary education need and provision arising between the two authorities;
- to identify and develop opportunities for health provision if required through evidence;
- to develop an agreed position on cross boundary flooding impacts;
- to develop an agreed position in relation to water supply and waste water treatment impacts of strategic allocation sites.

Strategic matters agreed between the two authorities are set out in:

- Northern West Sussex Statement of Common Ground (June/July 2023)
- Northern West Sussex Statement of Common Ground Housing Extract (June/July 2023)
- Water Neutrality Statement of Common Ground (June/July 2023)
- Gatwick Diamond Local Strategic Statement (2016)

This Statement of Common Ground is focused on the cross-boundary matters specifically affecting the two authorities.

**Agreements** reached for each of the matters are set out below:

#### Housing Need

The parties agree:

1. Both authorities are primarily located in the Northern West Sussex (NWS) Housing Market Area.
2. A robust and appropriate Strategic Housing Market Assessment has been completed for each local authority.
3. Each authority has assessed the ability of its area to accommodate housing development. They each consider that they are doing the maximum reasonable to meet the housing needs. MSDC has shared and invited comments from CBC on the methodology and conclusions of its Site Selection Process for its Regulation 18 draft and CBC.
4. CBC and MSDC will engage through the Northern West Sussex Authorities, the Gatwick Diamond Authorities and the West Sussex and Greater Brighton Authorities, as a wider Duty to Cooperate forums, with other neighbouring authorities in relation to housing related matters, including affordability, large scale developments and opportunities for meeting unmet need.
5. The Northern West Sussex authorities agree that, subject to meeting individual housing needs and establishing that there is potential to assist other authorities with unmet needs, assistance will be prioritised as follows:
  - Priority 1: Northern West Sussex HMA
  - Priority 2: Coastal West Sussex HMA
  - Priority 3: Other adjacent and nearby HMAs where it is justified by each individual authority.
6. The draft Crawley Local Plan identifies that Crawley's land supply allows for 42% of its overall housing needs to be met on sites within the borough's administrative boundaries: a minimum totalling 5,030 dwellings over the Plan period (2024 – 2040). This leaves a total unmet need figure of 7,050 dwellings (441dpa) to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development. In light of this unmet need, Crawley Borough

Council wrote to MSDC in January 2020 and in April 2023 to request whether Mid Sussex District Council is able to assist in contributing to these unmet needs.

7. The draft Mid Sussex District Plan (Regulation 18) was published in November 2022. The draft Mid Sussex District Plan covers the plan period 2021 – 2039 and will supersede the current adopted District Plan (2014-2031) upon adoption. It is based on a housing requirement of 1,119 dwellings per annum (20,142 for the full plan period) set by the Standard Methodology. Once accounting for existing commitments and completions, the draft Plan identifies a residual housing need of 8,169 dwellings. The draft Plan allocates three Sustainable Communities (mixed-use sites with over 1,000 dwellings and supporting infrastructure such as retail, community uses, education and open space), 21 housing sites and a windfall allowance – in total 8,471 dwellings. The draft Plan therefore aims to meet Mid Sussex housing need with an over-supply of 302 dwellings.
8. Crawley has an affordable housing need of 739 dwellings per year. The amount of affordable housing being met within the borough, through the Local Plan, is anticipated to equal 108dpa (15% of the overall need). The parties agree to consider opportunities to address affordable housing needs and appropriate housing mix as evidenced through the CBC SHMA and any subsequent updates, subject to viability, particularly, but not restricted to, where development may take place adjacent to Crawley. In such circumstances, the councils will seek to reach formal agreement in relation to shared nomination rights for the affordable housing provision.
9. Mid Sussex has an affordable housing need of 470 dwellings per annum (rented) and 455 dwellings per annum (other AHO products), indicating a pressing need for affordable housing in the district which forms the starting point for setting policy which will need to be weighed against the amount of housing that can be viably provided.
10. Due to Crawley's predominantly urban nature, with a high proportion of higher density residential schemes proposed, and the limited area of land outside the existing Built-Up Area Boundary, with the exception of the land affected by aircraft noise constraints, there are limited opportunities for self-build to take place within the borough's administrative boundaries. The current number of individuals and groups on the council's Self- and Custom-Build Register is 90; of which 73 are Part 1 entries (i.e. those which satisfy local eligibility criteria) and a further 17 are Part 2 entries. The parties acknowledge that those with a desire to self-build in the area will be able to register with the relevant authority subject to local eligibility criteria. The parties therefore agree that the outcomes of emerging policies will be monitored and policies reviewed in future if appropriate.
11. Both authorities will each seek to meet their own need for additional Traveller provision.

#### Employment, Economic Development and Retail

The parties agree:

12. CBC and MSDC are located within the Northern West Sussex Functional Economic Market Area.
13. An Economic Growth Assessment (2020) has been undertaken, and subsequently updated (September 2020 and January 2023) which identifies a total employment land requirement for Crawley of 26.2ha new business land, resulting in an outstanding requirement for a minimum of 13.73ha new B8 storage and distribution land.
14. A proposed new industrial-led (B8 storage and distribution) Strategic Employment Location at Gatwick Green, is planned to ensure this need is met within Crawley's boundary. This is considered to complement the offer of Burgess Hill Science and Technology Park, allocated

in the adopted Mid Sussex Site Allocations Development Plan Document (2022) which will not be providing B8 storage & distribution floorspace.

15. The “Town Centre First” approach for each authority is appropriate and neither are proposing strategic scale retail development.

#### Gatwick Airport

The parties agree:

16. Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.
17. As part of the submission Local Plan, CBC propose to allocate 13.73ha of land east of Balcombe Road, and south of the M23 Spur, referred to as Gatwick Green, for a strategic employment site. This site is identified by the Gatwick Airport Masterplan (2019) for safeguarding as to be utilised for a large area of surface car parking. CBC does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of their borough, and is of the view that the airport could accommodate parking more efficiently through decked parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport’s surface access obligations stated in the S106 legal agreement. Therefore, the CBC submission Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur.
18. Airport related parking should be located on-airport as the most sustainable location and should be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.
19. The appropriate noise contours for decision-making are the Gatwick Master Plan 2019 Additional Runway Summer Day 2040 contours (Plan 31) until such time as these are superseded by subsequent noise contours that are published by Gatwick Airport and approved by the CAA.
20. Each authority will work collaboratively with Gatwick Airport, the other Gatwick local authorities and the LEP to understand the implications of the proposed Northern Runway Nationally Significant Infrastructure Project (NSIP) on the environment, community and economy, and to respond to the Development Consent Order (DCO) application.
21. They will work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal Agreement, to share expertise on airport related matters including noise, air quality and parking.

#### Education

The parties agree:

22. Planning for education in Crawley borough will require discussions between the authority areas (CBC and MSDC), involving West Sussex County Council and the Department for Education.

#### Health

The parties agree:

23. Planning for health provision, particularly in relation to strategic sites adjacent to Crawley, will require discussions across the two authority areas (MSDC and CBC), involving NHS.

## Flooding

The parties agree:

24. Cross boundary flooding matters will be worked on at a strategic mitigation level, alongside the County Lead Local Flood Authority (West Sussex).

## Strategic Sites

The parties agree:

25. Development of Strategic Sites adjacent to the administrative boundary between the two authorities will be Local Plan-led to comply with the policies set out in the Mid Sussex District Local Plan and for the Crawley Borough Local Plan to also be a material consideration.
26. Where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together, along with the two county councils (Surrey and West Sussex) and Highways England, to establish a joint planning policy position to support positive and sustainable development management and maximise infrastructure and sustainability benefits. Robust transport modelling will be used to ensure that growth will not result in severe transport impacts upon the road networks in CBC and MSDC. They will continue to discuss any impacts on the strategic and local road network and will jointly explore opportunities for transport improvements, including public transport, through discussions with West Sussex County Councils. Appropriate higher densities and access to neighbourhood facilities should be explored between the parties and the site promoter to maximise active travel and public transport usage.
27. To work together to seek opportunities to ensure housing mix in terms of dwelling type, size and tenure meets the agreed need of the local communities, based on the Strategic Housing Market Assessments for both authorities, appropriate for an "At Crawley" location. Such opportunities to reflect local housing mix will be explored further as any allocation on/adjacent to the authority border proceeds through the Local Plan process. In particular, the Affordable Housing provision must explore opportunities to meet needs considered to be most acute and appropriate for a strategic development in this location. The councils will seek to reach formal agreement in relation to shared nomination rights for the affordable housing provision.
28. They will continue to work together to consider any impacts on other infrastructure, such as health, education, water supply and waste water.

## 5. Governance Arrangements

The authorities are committed to working positively together, sharing information and best practice and continuing to procure evidence jointly, where appropriate, 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.

This Statement of Common Ground is signed at Head of Service level and will be reviewed at each key stage of plan-making. It will be updated to reflect progress made through effective cooperation.

In terms of governance, the authorities agree:

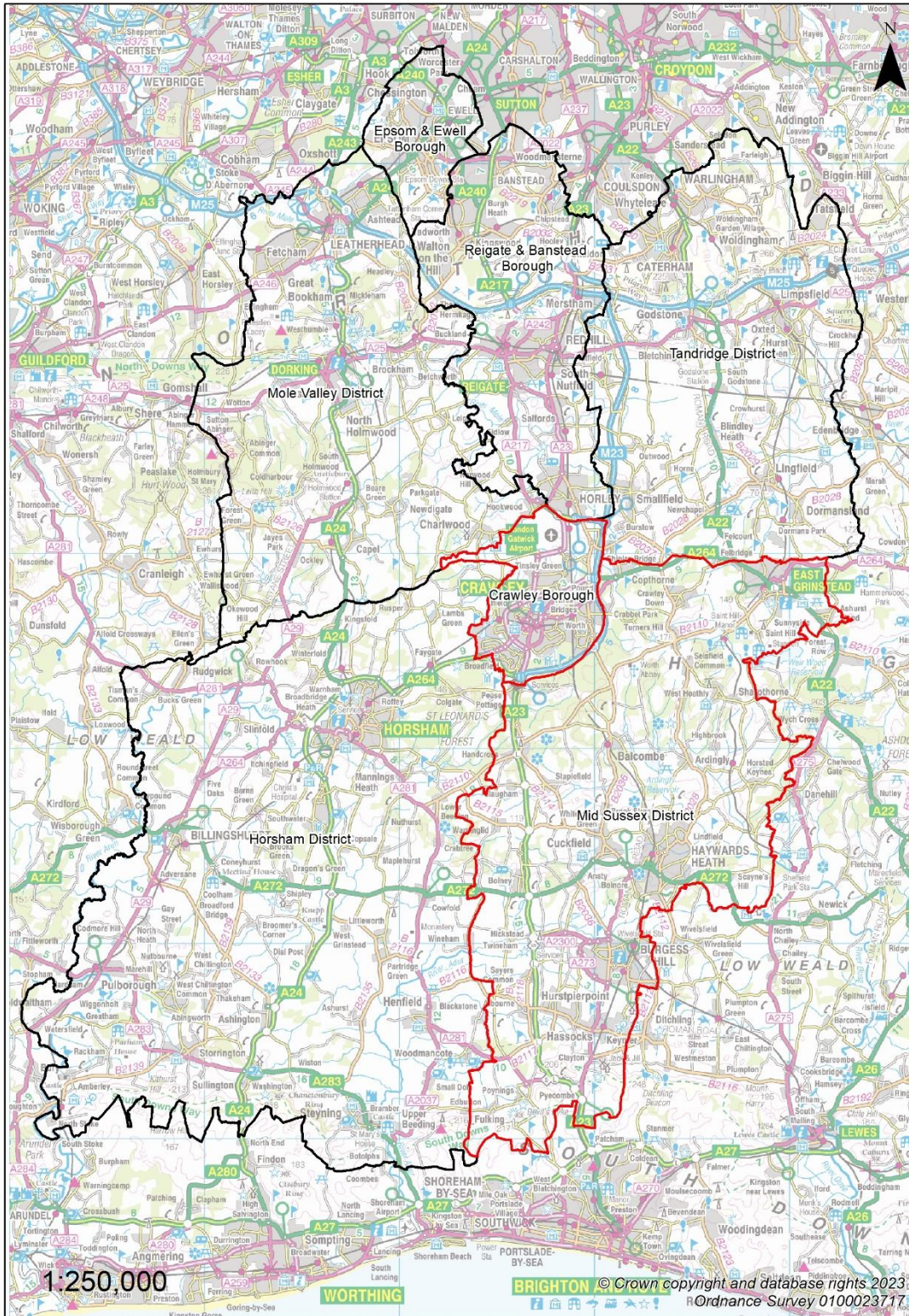
29. that they have engaged on an ongoing basis throughout preparation of the Local Plan Reviews and on this basis that the Duty-to-Cooperate has been met;

30. to continue to work with the other Northern West Sussex authorities on housing, employment, Gatwick Airport and other strategic issues affecting the Northern West Sussex Housing and Economic Market Area as a whole;
31. to work collaboratively on plan preparation and evidence, whilst acknowledging each other's timetables and timescales.
32. to respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities;
33. to meet at member and officer level to review the situation and respond to new issues and changing circumstances; and
34. to update this SoCG as progress continues through the preparation of the local plans and development plan documents for each of the authorities.

#### 6. Timetable for review and ongoing cooperation

LPA	Present Plan Adoption	Proposed Plan Review Date	Reg.18 Date	Target Reg.19 Date	Target Submission Date
<b>Crawley Local Plan</b>	Dec 2015	2019 - 2024	July 2019	Jan 2020/Jan 2021/May 2023	July 2023
<b>Mid Sussex District Plan</b>	March 2018	2022 - 2024	Nov 2022	Autumn 2023	Winter 2023

# APPENDIX A - GATWICK DIAMOND AUTHORITIES





## APPENDIX B: BACKGROUND SUPPORTING CONTEXT

### Housing Need:

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	<p>Working collaboratively on Housing Need including affordable housing across the Northern West Sussex Housing Market Area as far as is relevant.</p>
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Strategic Housing Market Assessment (2019)</li> <li>• Crawley Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (draft 2023 Review)</li> <li>• Mid Sussex Council Gypsy and Traveller Accommodation Assessment (2022)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Crawley and Mid Sussex lie within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham District.</li> <li>• Crawley can meet 41% of its overall housing need and 15% of its affordable housing need.</li> <li>• There is no immediate need arising from Crawley’s Gypsy, Traveller and Travelling Showpeople population for new pitch or plot sites. However, there may be a need arising later within the Plan period. A review is currently underway to confirm this remains the position.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• The parties agree that each authority has assessed the ability of its area to accommodate housing development. They each consider that they are doing the maximum reasonable to meet the housing needs.</li> <li>• The two authorities continue to work jointly to discuss and seek to resolve meeting housing needs, as well as part of Northern West Sussex authorities, Gatwick Diamond authorities and West Sussex Greater Brighton authorities.</li> <li>• The Gatwick Diamond authorities (which include Crawley, Mid Sussex, Horsham, Tandridge, Reigate &amp; Banstead and Mole Valley) agree to seek to meet their own need for additional Traveller provision.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• As each of the housing supply or updated housing market evidence is completed, the findings will be shared with between the councils.</li> </ul>

#### Employment and economic development:

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	To establish a common understanding of the employment Land requirement.
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Northern West Sussex Economic Growth Assessment (January 2020)</li> <li>• Mid Sussex Economic Growth Assessment Update (September 2022)</li> <li>• Crawley Focused EGA Update (September 2020)</li> <li>• Crawley Focused EGA Update (January 2023)</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• The NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA).</li> <li>• Influential economic linkages also exist with Coastal West Sussex, Reigate and Banstead (Horley) and East Sussex.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• The CBC submission Local Plan seeks to meet the most recently identified office and industrial (storage and distribution) needs in its borough.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• The authorities will continue to work together with the other Northern West Sussex, Gatwick Diamond and West Sussex and Greater Brighton authorities on housing, employment and other strategic issues affecting the wider sub-region.</li> </ul>

#### Gatwick Airport:

<ul style="list-style-type: none"> <li>• Key objective</li> </ul>	To develop a shared approach to Gatwick Airport including the impact of air quality and noise pollution.
<ul style="list-style-type: none"> <li>• Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>• Annual Airport Parking Surveys</li> <li>• Gatwick Airport Masterplan 2019</li> <li>• Gatwick Airport, WSCC, CBC Section 106 Legal Agreement 2018</li> </ul>
<ul style="list-style-type: none"> <li>• Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>• Gatwick Airport influences the environment, economy and community in the area.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.</li> <li>• Airport related parking should be located on-airport as the most sustainable location, and should be justified by a demonstrable need in the context of proposals for</li> </ul>

	achieving a sustainable approach to surface transport access to the airport.
<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>The authorities will continue to work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal Agreement, to share expertise on airport related matters including noise, air quality and parking.</li> </ul>

Education:

<ul style="list-style-type: none"> <li>Key objective</li> </ul>	To establish a common and agreed position of Secondary Education.
<ul style="list-style-type: none"> <li>Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>Crawley draft Infrastructure Plan (2023)</li> <li>Mid Sussex Infrastructure Delivery Plan (2022)</li> </ul>
<ul style="list-style-type: none"> <li>Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>CBC has needs for secondary education provision within the vicinity over their Local Plan period.</li> </ul>
<ul style="list-style-type: none"> <li>Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>CBC and MSDC agree that planning for secondary education will require discussions involving West Sussex County Council.</li> </ul>
<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>Discussions to be arranged across the authority areas (CBC, MSDC), involving West Sussex County Councils.</li> </ul>

Health:

<ul style="list-style-type: none"> <li>Key objective</li> </ul>	To identify and develop opportunities for Health provision if required through evidence.
<ul style="list-style-type: none"> <li>Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>Crawley draft Infrastructure Plan (2023)</li> <li>Mid Sussex Infrastructure Delivery Plan (2022)</li> </ul>
<ul style="list-style-type: none"> <li>Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
<ul style="list-style-type: none"> <li>Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>CBC and MSDC agree that planning for health provision will require discussions across the two authority areas, involving NHS.</li> </ul>

<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>Discussions to be arranged across the two authority areas (CBC, MSDC), involving NHS.</li> </ul>
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#### Transport Infrastructure:

<ul style="list-style-type: none"> <li>Key objective</li> </ul>	<p>To develop an agreed position on the transport impacts of strategic allocated sites.</p>
<ul style="list-style-type: none"> <li>Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>Crawley Local Plan Transport Modelling (June 2022)</li> <li>Crawley Infrastructure Plan (2023)</li> <li>Crawley New Directions Transport Strategy 2020</li> <li>Mid Sussex Transport Study (2022)</li> <li>Mid Sussex Infrastructure Delivery Plan (2022)</li> </ul>
<ul style="list-style-type: none"> <li>Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
<ul style="list-style-type: none"> <li>Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>CBC and MSDC agree that where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive development management and maximise infrastructure benefits.</li> </ul>
<ul style="list-style-type: none"> <li>Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>Where strategic development is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint Planning Policy position to support positive Development Management and maximise infrastructure benefits.</li> <li>The authorities agree to jointly explore opportunities through discussions with West Sussex County Council.</li> </ul>

#### Water Supply and Waste Water Infrastructure:

<ul style="list-style-type: none"> <li>Key objective</li> </ul>	<p>To develop an agreed position on the water supply and waste water impacts of strategic allocated sites.</p>
<ul style="list-style-type: none"> <li>Relevant studies, intelligence or evidence base completed or to do</li> </ul>	<ul style="list-style-type: none"> <li>Gatwick Water Cycle Study (2020)</li> <li>Crawley draft Infrastructure Plan (2023)</li> <li>Mid Sussex Infrastructure Delivery Plan (2022)</li> </ul>
<ul style="list-style-type: none"> <li>Key conclusions from the evidence</li> </ul>	<ul style="list-style-type: none"> <li>The conclusions of the Gatwick Water Cycle Study confirm that the South East remains an area of serious water stress.</li> </ul>

	<ul style="list-style-type: none"> <li>• Water Neutrality affects the Sussex North Water Resource Zone. This extends across much of CBC. MSDC mostly falls outside of this area.</li> <li>• Crawley WwTWs is scored as “red” by Thames Water indicating that future upgrades will be required.</li> </ul>
<ul style="list-style-type: none"> <li>• Agreement that has been reached or progress made</li> </ul>	<ul style="list-style-type: none"> <li>• CBC and MSDC agree that where development with strategic implications is proposed close to the authorities’ common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive development management and maximise infrastructure benefits.</li> </ul>
<ul style="list-style-type: none"> <li>• Any further actions / governance requirements etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Where strategic development is proposed close to the authorities’ common administrative boundary, the authorities will work together to establish a joint Planning Policy position to support positive Development Management and maximise infrastructure benefits.</li> <li>• The authorities agree to jointly explore opportunities through discussions with the relevant Water Companies.</li> </ul>