

CRAWLEY BOROUGH COUNCIL

LOCAL PLAN REVIEW

Crawley 2024 – 2040: Duty to Cooperate Statement

Appendix K: Responses from Prescribed Bodies to Crawley Borough Council's Duty to Cooperate Correspondence, April 2023

September 2023



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ADUR & WORTHING
COUNCILS

Adur & Worthing Councils
Portland House
44 Richmond Road
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West Sussex, BN11 1HS
www.adur-worthing.gov.uk

Elizabeth Brigden
Crawley Borough Council
By email

Date: 25th April 2023
Service: Planning Policy
Tel: 01273-263247
Planning.policy @adur-
worthing.gov.uk

Dear Elizabeth,

Crawley Borough Submission Local Plan - Duty To Co-operate

Many thanks for your letter of 14 April 2023, regarding the forthcoming submission of the Crawley Local Plan and associated Duty to Co-operate matters.

We have looked at the Duty to Co-operate document and 'Unmet Needs and Duty to Co-operate Topic Paper', and have no issues we wish to raise.

The Adur Local Plan was adopted in December 2017. This seeks to deliver a minimum of 3,718 dwellings per annum up to 2032 (an annual target of 177 dwellings). This was a capacity based figure due to the recognised constraints and development capacity of the Adur Local Plan area. This is in contrast to the assessment of Objectively Assessed Need at that time, of 325 dwellings per annum (or 6,825 dwellings over the plan period). In summary the Plan at adoption was meeting just 54% of Adur's identified need.

The update of the Adur Local Plan has commenced, and is looking up to at least 2039. The Standard Methodology figure for Adur is currently 448 dwellings per annum. The Council is undertaking a thorough appraisal of all potential options and is committed to 'leaving no stone unturned'; however despite this it is likely that not all need for housing, employment and other forms of development can be met within the Adur Local Plan area.

Similarly the Worthing Local Plan was adopted on 28th March 2023 with a housing capacity figure of a minimum of 3,672 dwellings over the period 2020-2036. This again is a capacity-based figure based on the identified constraints and development capacity of the Borough. This is significantly below the level of housing needs required (14,160 dwellings) and represents approximately 26% of Worthing's housing need.

As both Adur District and Worthing Borough Councils are unable to meet their own needs in full, I am afraid that the Councils will be unable to assist Crawley in meeting its unmet needs for housing, employment, or other development needs as set out in Crawley's Unmet Needs and Duty to Co-operate Topic Paper.

With regards to Statements of Common Ground, I note a Statement was agreed between Worthing Borough Council and Crawley Borough Council on 13th May 2021. We are happy to update this, and to agree a similar statement between Adur District Council and Crawley.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Hayes', enclosed in a thin black rectangular border.

Moira Hayes
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Arun District Council
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e-mail: kevin.owen@arun.gov.uk

Mr Clem Smith (Head of Economy and Planning)
Crawley Borough Council
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Crawley
West Sussex
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15 June 2023

Please ask for: Kevin Owen
Planning Policy Team
Directorate of Growth

Our Ref: LCBC_DtC140623

Dear Clem Smith,

Crawley Borough Submission draft Local Plan 2024 – 2040: Duty to Cooperate

Thank you for your letter of 14 April regarding the 3rd Publication Local Plan consultation (re above) and identifying matters that may need updating in the Statement of Common Ground agreed by each party authority (Crawley Borough Council and Arun District Council on 17 June and 22 July 2021 respectively). Apologies I have not been able to meet your suggested response deadlines. My response is set out below in this letter.

In your letter with respect to the updated position on Crawley Borough Council's level of unmet housing need, you invite Arun District Council (ADC) to comment on the information included with Crawley Borough Council's (CBC) updated Duty to Cooperate Statement and in particular, ADC's role in assisting with unmet need under the 'Duty to Cooperate' (DtC) as calculated against the Standard Housing Methodology for CBC over the Local Plan period 2024 – 2040. This suggests:-

- A 7,050 dwelling unmet need
- The needs of specific communities

ADC commenced a Local Plan update in January 2020 but this was paused in 2021 and 2022. At the Planning policy Committee on 6 June 2023 members agreed to recommend to Full Council (19 July) that the pause be lifted. It is therefore, very early in the Local Plan update process and officers are hoping that the update will be resumed by Full Council on 19 July. Part of the evidence base on the potential housing need for Arun is explored in a Housing Need Review study 2023:-

<https://www.arun.gov.uk/download.cfm?doc=docm93ijm4n19744.docx&ver=24231>

Arun will have a significant challenge in delivering a 1,400-dwelling pa (based on Government's Standard Housing Methodology) calculation of housing need compared to the current adopted Local Plan Target of 1,000 dpa. One of the key pieces of evidence will be to commission a Housing and Economic Development Needs Assessment.

Until Arun has commissioned further evidence such as the HEDNA and undertaken significant further work on constraints and infrastructure to update the Local Plan, it is not possible to come to a view on meeting unmet needs from elsewhere or indeed provision for specific forms of need including affordable housing.

As your letter points out, CBC sits within the North West Sussex Housing Market Area (NWS HMA) with Horsham and Mid Sussex council's and the priority must be to try to resolve unmet need within that HMA. While it is shown in your evidence that there remains an unmet need, ADC would urge that collective authorities within that the NWS HMA exhaust all possibilities through looking at potential land supply and viable densities including the recycling of brownfield land.

Arun is likely to face significant issues in accommodating its own housing requirements including delivering affordable housing. It would not seem sustainable or pragmatic for unmet needs including affordable needs to be exported beyond the NWS HMA where jobs, a strong economy, services transport, family and social support networks already exist.

Arun is very remote from CBC and even rail transport would be difficult especially for lower income households. Road transport is very difficult with main networks serving east – west connectivity rather than to the north, and these are heavily congested.

Neighbouring authorities within the Sussex Coastal HMA in which Arun resides are all struggling with levels of unmet need and infrastructure capacity/viability.

With that in mind, ADC would consider it appropriate for CBC and authorities in the NW HMA to firstly, engage more urgently with the Local Strategic Statement 3 work under the West Sussex & Greater Brighton Strategic Planning Board area (WSGB) before seeking assistance in the Sussex Coastal HMA. For example, work had commenced on the draft Statement of Common Ground for the LSS3 and WSGB area which affords a more strategic process to address significant cross boundary planning issues, unmet needs and infrastructure.

On this basis Arun does not consider that the signed Statement of Common Ground between our two authority's needs updating at this time.

Yours sincerely



Kevin Owen

Planning Policy Team Leader, Planning Policy and Conservation

Date: 4 May 2023
Ref: BHCC/
Phone:
e-mail:

Dear Councillor Smith,

Crawley Borough Submission draft Local Plan 2024–2040: Duty to Cooperate

I write in response to your letter dated 14 April 2023 requesting assistance from Brighton & Hove City Council (BHCC) in meeting Crawley Borough's unmet housing needs under the Duty to Cooperate.

Context

Brighton & Hove shares similarities with Crawley Borough in being a predominantly urban area subject to severe physical and environmental constraints. The city is constrained by the sea to the south and the South Downs National Park to the north, east and west of the built-up area. This has led to a shortage of potential development sites and a substantial unmet housing need. It should also be noted that Brighton & Hove is a considerable distance from Crawley (over 20 miles) and falls within a different housing and functional economic market area, although there is some overlap between the Greater Brighton and northern West Sussex market areas.

BHCC is committed to engaging positively with its neighbours to address strategic planning matters through the Duty to Cooperate and to ensure that any 'larger than local' issues are highlighted and addressed. Both BHCC and Crawley Borough Council (CBC) are members of the West Sussex and Greater Brighton Strategic Planning Board and have committed to working towards preparing a third revision of the Local Strategic Statement (LSS3) which will explore options for meeting the area's unmet needs for housing and employment, and identify the strategic infrastructure required to support planned growth.

I note that your updated draft Duty to Cooperate Statement sets out a detailed record of discussion and joint working carried out with neighbouring authorities, including Brighton & Hove, during preparation of the draft Submission Local Plan.

Housing needs

I note your assessment in Topic Paper 1 identifies housing land supply sufficient to meet only 42% of the borough's assessed housing need over the Plan period to 2040, leaving a remaining unmet housing need of approximately 7,050 dwellings. In addition the

assessment identifies substantial unmet needs with regard to affordable housing and self and custom build homes.

As you may be aware, Brighton & Hove has a very substantial housing shortfall. The city is subject to major physical and environmental constraints which severely limit the potential to meet identified needs within our own boundaries. The City Plan Part One (CPP1) adopted in March 2016 set a housing provision target to deliver a minimum of 13,200 net dwellings over the period 2010- 2030 (660 net dwellings per year). However, this figure accounted for only 44% of the city's objectively assessed housing needs (OAN) which were assessed in 2015 as 30,120 net dwellings (1,506 net dwellings per year).

The current assessed housing need for Brighton & Hove based on the Government standard methodology is higher than the figure estimated in 2015. Applying the standard method now gives an initial assessed housing need of 1,728 homes per year for Brighton & Hove. Following amendment to national planning practice guidance in June 2021, it is now necessary to apply a further 35% uplift as one of the top 20 urban centres. This adjustment increases the city's assessed housing need still further to 2,333 homes per year (2023 figures). As such, the city faces a continuing and very substantial shortfall in attempting to meet its own identified housing needs going forward.

The city has similar large shortfalls with respect to affordable housing. The 2015 housing assessment also identified a net need across the city for 810 affordable homes per year (representing 61% of the total OAN). Taking account of land availability and viability considerations, the affordable housing policy in CPP1 seeks 40% affordable housing on sites of 15 or more dwellings, with lower percentages sought for smaller housing developments. Reflecting this, the CPP1 Implementation and Monitoring Plan sets a target to achieve approximately 30% of all housing delivery as affordable housing. Again this falls well short of the city's assessed requirement.

The City Council has also fallen short of meeting the demand for self- or custom-build homes identified on the council's housebuilding register. This reflects the very limited scope for meeting this form of demand within the city, as there are very few greenfield housing opportunities with the vast majority of housing development comprising high density development on brownfield urban sites.

BHCC Plan progress

The current Brighton & Hove City Plan covers the period up to 2030. Following the adoption of CPP1 in March 2016, the City Council in October 2022 formally adopted City Plan Part Two (CPP2) which includes site allocations and detailed development management policies. The Council has now commenced work on a City Plan Review which will involve updating the overall development strategy and key strategic policies, including updating existing housing targets. However, due to the city's constraints, addressing our own identified housing needs is likely to continue to be very challenging.



City Development & Regeneration
Brighton & Hove City Council
1st Floor, Hove Town Hall
Norton Road
Hove
BN3 3BQ

For the reasons set out above, the City Council is not able to help meet any of Crawley's unmet housing needs.

We do not consider it necessary to prepare a specific Statement of Common Ground, but will continue to work jointly with CBC through the Strategic Planning Board and other sub-regional level groups,

Yours sincerely

Liz Hobden
Head of Planning
City Development and Regeneration
Brighton & Hove City Council

Strategic Planning
Crawley Borough Council
Town Hall
The Boulevard
Crawley
RH10 1UZ

If calling please ask for: **Tony Whitty**

Our ref:

Your ref:

19 June 2023

Dear Sir/Madam

Crawley Local Plan Review - Regulation 19 and response to Duty to Cooperate request

Thank you for consulting Chichester District Council (CDC) on the Regulation 19 Crawley Borough Submission draft Local Plan 2024 - 2040, published 9 May 2023. This letter sets out our formal response to the consultation, and our formal response to your request (14 April 2023) that CDC consider assisting Crawley Borough Council (CBC) in addressing unmet development needs under the Duty to Cooperate provisions of 7,050 dwellings and particular housing types needed to meet the needs of specific communities.

In our 7 March 2021 response to the January 2021 Regulation 19 consultation, we:

- welcomed the continued recognition given to the ongoing work of the West Sussex and Greater Brighton Strategic Planning Board in addressing cross-boundary and sub-regional matters to ensure that the strategic development and infrastructure needs of the overall area are met as far as possible within the context of the provision of the National Planning Policy Framework (NPPF) (as set out in Topic Paper 1: Unmet needs and Duty to Cooperate).
- noted the position of Crawley Borough Council (CBC) as being unable to meet its OAHN and that CBC needs to look to other authorities in the wider area.
- recognised that there was a significant shortfall over the plan period of 6,680 dwellings, as a result of 5,320 dwellings being the maximum which could sustainably be delivered at that time.
- set out that we would encourage CBC to further investigate all potential opportunities to increase housing provision within its plan area to ensure that no

stone is left unturned by the Council in maximising the potential of the existing urban areas to regenerate and be intensified, where appropriate to do so.

- committed to continuing to engage constructively, actively and on an ongoing basis with other local authorities and organisations to address sub-regional issues, including through the West Sussex and Greater Brighton Strategic Planning Board.

In response to the Regulation 19 Crawley Borough Submission draft Local Plan 2024 - 2040, published 9 May 2023, CDC:

- understands that the objectively assessed housing needs figure for CBC is 12,080 dwellings (755 dpa) and that the draft Local Plan provides for 5,030 dwellings (314dpa), which results in an unmet need of 7,050 dwellings (as set out in Table 1 of Topic Paper 1: Unmet Needs and Duty to Cooperate, May 2023). This also results in an unmet affordable housing need of 9,812 dwellings (613 dpa) and an unquantified potential unmet need for self and custom build housing.
- recognises the additional work that has been carried out to seek additional sites and to reassess sites as well as density levels.
- supports the recognition in Policy H1 and paragraph 12.38 that the supply figure is a minimum.
- supports paragraph 1.31 which recognises the ongoing role of the West Sussex and Greater Brighton Strategic Planning Board in discussing strategic issues (including the preparation of the Local Strategic Statement) and the partnership working to resolve the water supply constraint to development within the Sussex North Water Resource Zone.
- supports the approach to housing provision set out in Policy H1 and the commitment to continue to work closely with neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area to explore opportunities for meeting unmet need. CDC agree that the Northern West Sussex Housing Market Area authorities are best placed to fulfil this role.
- supports the introduction of high-density targets for the Town Centre and accessible locations (Policy CL4) and the housing typology policies (Policy H3, H3a – H3f) which will help to maximise capacity and positively influence development opportunities.
- supports the acknowledgement in paragraphs 12.17 – 12.23 of the draft Local Plan that, in the longer term, well planned urban extensions could form an important way to meet Crawley's unmet housing needs, through informing discussions with neighbouring authorities within the Northern West Sussex Housing Market Area.

- supports the approach taken to water neutrality and Policy SDC4 Water Neutrality. This has resulted from joint working by Chichester District Council, Horsham District Council and Crawley Borough Council to produce technical evidence to support the approach. We will welcome continued joint working with CBC on the delivery of the implementation scheme to ensure proposed new development demonstrates water neutrality and meets the requirements of the Habitats Regulations.

In response to your Duty to Cooperate request dated 14 April 2023:

- CDC recently published our Proposed Submission Local Plan 2021 – 2039 for Regulation 19 consultation. The position set out in the Plan is that following the completion of evidence work, we will be providing a supply of 575dpa; a total of 10,350 dwellings over the plan period. This is below our objectively assessed need figure of 638dpa due to the significant constraint of A27 junction capacity. Therefore, CDC are also generating an unmet housing need which we have been engaging with neighbouring authorities on under the Duty to Cooperate. This also means that we are unable to assist the South Downs National Park Authority with their unmet needs (arising from the part of the SDNP within Chichester District) as was previously proposed in the Preferred Approach draft of the Local Plan (2018).
- As a result of not being able to meet our own needs, we cannot agree to meet any unmet needs arising from Crawley Borough currently. If we were able to take unmet need, we would first have to consider assisting authority areas more directly related to the Chichester Plan area, particularly the South Downs National Park Authority.
- Similarly, like CBC, CDC will have an unmet affordable housing need over the plan period, compounded by pressures on the viability, which restrict the affordable housing thresholds which can be required in relation to new development. Consequently, CDC is not able to accommodate any unmet affordable housing need from neighbouring authorities.
- In relation to self and custom build, CDC is proposing to make provision for those on its register with a preference to live in the plan area via requirements to provide plots on the strategic housing allocations. However, these will be primarily around Chichester and hence unlikely to be suitable for self-builders on CBC register owing to the geographical separation. There is the possibility that some opportunities will become available via neighbourhood planning in the northern part of the CDC plan area, though it is presumed that this will be focused on local needs, and hence it is presumed that there will be no scope to formally meet the needs from elsewhere via this process. Nevertheless, there may be the potential

for some plots to become available on an ad hoc basis, but it is unlikely that the CDC can commit to accommodating a specific level of self and custom build need from CBC.

If you have any queries concerning this letter, please do not hesitate to contact me or Claire Potts, Planning Policy Team Manager (cpotts@chichester.gov.uk).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Tony Whitty', is enclosed in a thin black rectangular border.

Tony Whitty
Divisional Manager Planning Policy

Justin Turvey BA (Hons) DIPTP, MRTPI
Interim Head of Place Development



Via email

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DX 30713 Epsom

Date 27 April 2023

Contact Susie Legg
Direct line 01372 732393

Email localplan@epsom-ewell.gov.uk

Dear Elizabeth Brigden

Re: Crawley Borough Local Plan: Duty to Cooperate

Thank you for your email dated 14 April 2023 seeking assistance in meeting Crawley's unmet development needs and opinion on Crawley's emerging Duty to Cooperate Statement. As acknowledged in your email, we are currently in the pre-election period, so this response is an officer's opinion.

Epsom and Ewell Borough Council is in the process of preparing its new Local Plan and consulted on a regulation 18 draft in February/March 2023. Epsom & Ewell is in a similar position to Crawley, having a significant shortfall of land to meet our development needs. We are also a constrained borough, with land mostly being either urban or designated as Green Belt. Our evidence demonstrates that urban sites within the borough could deliver approximately 36% of the need identified through the standard method, although there is currently uncertainty as to the availability of some of the sites. We have explored alternative options to increase supply, which included writing to neighbouring authorities and some further afield (including Crawley Borough Council), to ask for assistance in meeting out unmet needs. To date, no authority has indicated they are able to assist. Our draft Local Plan also considers the potential release of a limited amount of Green Belt land which we estimate would boost supply to approximately 56% of our identified need.

As such, we are in a position where meeting our own needs is proving exceptionally challenging and are therefore unable to assist with meeting any of Crawley's unmet needs.

With regards to your emerging Duty to Cooperate Statement, we have not identified any issues beyond those already mentioned. Crawley and Epsom & Ewell both face

challenges in meeting their identified developments needs and we will continue to engage on this matter, where relevant, via the channels already in place (e.g. through the Gatwick Diamond meetings and/or direct engagement via the Duty to Cooperate).

Should you have any questions in relation to the above, please do not hesitate to contact me and I wish you all the best with your forthcoming regulation 19 consultation.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'JT', enclosed in a light blue rectangular box.

Justin Turvey

Interim Head of Place Development

From: RE: Crawley Borough Local Plan: Duty to Cooperate - Guildford Borough Council [UNC]
To: 19 April 2023 10:03:41
Cc:
Subject:
Date:

Dear Elizabeth,

Thank you for your letter and request regarding whether Guildford borough is able to assist Crawley in meeting its unmet needs.

By means of context in terms of our authority's position, Guildford adopted the Local Plan: strategy and sites in April 2019. This plan allocates sufficient homes to meet Guildford's full OAN with an appropriate level of supply over and above the minimum requirement to ensure that the OAN can actually be delivered over the plan period and a rolling five year land supply can be maintained. The provision of headroom that is included in the plan has been tested through the High Court and found to be justified. It is important to stress that this is not surplus supply and cannot therefore contribute towards meeting unmet needs from elsewhere.

If it can be successfully demonstrated that the constraints within Crawley are such that OAN cannot be met within your borough, then duty to cooperate should be used to explore the extent to which unmet needs can be met elsewhere.

In the context of the above, and your request, Guildford borough is unable to meet any unmet housing need from Crawley. In any case, our Strategic Housing Market Assessment finds limited, if any, functional links between Guildford and Crawley and concludes we sit within different housing market areas. We consider that if unmet needs do need to be met elsewhere then in the first instance this should be directed to local authorities within your housing market area.

We wish you well with your upcoming consultation.

Kind regards,

Riaan van Eeden MRTPI
Principal Policy Officer
Planning Policy

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Sent: 14 April 2023 10:42

To: Planning Policy <PlanningPolicy@guildford.gov.uk>

Subject: Crawley Borough Local Plan: Duty to Cooperate - Guildford Borough Council

Dear Sir/Madam,

You will be aware that the Crawley Borough Local Plan 2024-2040 was recently approved at Full Council for its Publication Consultation (Regulation 19) and Submission for Examination. The formal public consultation is scheduled to commence on Tuesday 9 May 2023.

Please find attached the emerging Duty to Cooperate Statement which has been updated to support the Local Plan consultation. I would be grateful if you are able to check through this document and let me know if there are any factual corrections you would like me to make before it is made publicly available. Please do also let me know if it contains anything which is of concern to you. For your information, I have also attached a draft Unmet Needs Topic Paper, which will also be published to support the Local Plan consultation. Similarly, please do let me know if you have any comments or changes you need me to make.

For both of these documents, I will need any comments back by **Friday 28 April 2023** at the latest, to be able to take it into account for the consultation versions.

In addition, please find attached a letter from Crawley Borough Council to your authority setting out Crawley's unmet needs, and requesting a response in relation to the potential for meeting these needs. A formal response to this letter, along with any formal detailed comments you have on the above mentioned documents, can occur any time until the close of the Regulation 19 consultation, either for a further conversation/agreement as part of the Duty to Cooperate or as your formal representations (consultation is due to close on 20 June 2023).

I look forward to hearing from you. Please do not hesitate to contact me for any clarification on the above or attached.

Kind Regards
Elizabeth

Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council

www.crawley.gov.uk/planning

Elizabeth Brigden
Planning Policy Manager, CBC
Via email only

Our ref: DTC/CBC
Your ref: CBLP/DTC

19 April 2023

Dear Elizabeth,

Crawley Borough Local Plan: Duty to Cooperate – Horsham District Council

Thank you for your email dated 14th April 2023 in relation to the Crawley Borough Local Plan (CBLP) and the Duty to Cooperate.

As you allude to in your email, HDC is in its pre-election period and therefore at this time it is not possible for the authority to provide a formal response to the matters raised in the email and related documentation. As such, this is an officer-level response. A more comprehensive response will be provided on your Regulation 19 Local Plan during the publication period. Additionally, some of the documents submitted are very detailed and it is not possible for us to thoroughly review in such a short time period. Therefore, further comments may be made upon further review as part of the Regulation 19 response.

Unmet overall housing needs

Firstly, though we have commented on previous drafts of the CBLP that CBC should undertake work to look at whether it can increase the amount of planned development to occur within its urban area (which we shall review during the upcoming Regulation 19 publication), we recognise that CBC is a constrained authority. Therefore, and in the context of rising housing needs in CBC and across the region, we accept that it is very unlikely that CBC could be in a position to meet its own needs in full.

We therefore note the request for HDC to assist in meeting CBC's unmet needs through the Horsham District Local Plan. You will know that meeting unmet needs has been a regular theme in discussions, both on a bilateral basis and during work done at a wider scale – such as at the North West Sussex (NWS) Housing Market Area (HMA) level. You will also know, as is recognised in the documentation, that the Horsham District Planning Framework's housing requirement was increased by 150 homes per year to assist with unmet needs in Crawley.

We have engaged positively with yourselves during the preparation of our respective new Local Plans to understand your position and to assist in addressing unmet needs. As a consequence of this engagement, we indicated in our draft Regulation 19 Local Plan (July 2021) that was considered by our Cabinet, that we would look to meet half of your reported (at that time) unmet overall housing needs – equating to 193 homes per year.

However, you are aware that July 2021 of the Local Plan did not progress to a Regulation 19 publication period. Initially this was because of an unexpected alteration to the NPPF necessitating immediate changes to strategic site policies. More fundamentally, the implications of the September 2021 Natural England Position Statement on water neutrality

has meant that HDC has not been able to make available a Local Plan for a Regulation 19 publication period.

In relation to water neutrality, we have worked very effectively together and developed a joint evidence base with partner authorities, drafted a joint policy and are working closely to set up a water offsetting scheme which developers could access to demonstrate water neutrality in new development. All of this work, as well as a shared commitment to future joint working, will be outlined in the Joint Water Neutrality Topic Paper and the Water Neutrality Statement of Common Ground that we both wish to see finalised and published in short order.

As part of the joint water neutrality work, we have shared with you details of our emerging housing trajectory for our Local Plans, which reflects the impact of the water neutrality constraint and takes account of the reduction in permissions granted in the last 18 months. You therefore are aware that the current water neutrality evidence base indicates that we could deliver a Local Plan that averages 800 homes per year when accounting for development elsewhere in the Sussex North Water Resource Zone, including within Crawley Borough. Given that the standard method indicates that the starting point for our Local Plan should be 911 homes per year, if we were to deliver a Local Plan on the basis of an average of 800 homes per year, we would be unable to meet our needs in full. Accordingly, based on the circumstances that HDC find ourselves in, we can therefore not commit to meeting any part of the unmet overall housing needs of CBC at this time.

Despite the above, we recognise that we share a common primary housing market and, alongside Mid Sussex District Council (MSDC), we will continue to explore meeting unmet needs across the NWSHMA, recognising that the situation in relation to water neutrality is expected to be resolved in the future. In addition, a Statement of Common Ground is expected to be finalised soon between the NWSHMA authorities in relation to housing, which will make clear our collective desire to ensuring that needs in the NWSHMA are fully addressed.

Edge of Crawley sites

We note mention of sites on the edge of Crawley in your documentation and their potential ability to accommodate Crawley's unmet needs in relation to overall unmet housing needs and affordable housing.

To make clear, whilst HDC is considering a large site on the edge of Crawley (known either as West of Crawley or West of Ifield), no formal decision has been made as to whether propose this site as an allocation in our emerging Local Plan. However, as the development of the site could have cross boundary impacts, we have worked with yourselves and shared information relating to the proposal.

Should the proposal come forward as an allocation in our Local Plan, we will continue with this ongoing engagement to ensure that impacts of development and the needs of Crawley Borough (including consideration of affordable housing needs) can be considered. However, as no decision has been made to allocate this site, we cannot comment more specifically on this issue at the current time.

As stated earlier in this letter, HDC cannot demonstrate that it can meet its own overall housing needs in full. At this stage therefore we would not expect to be able to apportion part or all of the amount of development that could potentially be delivered at West of Ifield (or indeed any other proposed allocation) to meeting Crawley's unmet overall housing needs. This is in line with the prioritisation that will be set out in the NWSHMA Statement of Common Ground on housing. We will however keep this matter under review taking account of the impacts and solutions to water neutrality.

Other Matters

We are happy to discuss self and custom building housing as part of future duty to cooperate discussions. As with other elements, we are not however in a position to commit to meeting needs of other authorities as we may not be in a position to meet our own unmet needs.

The table relating to paragraph 3.1.7 of Topic Paper 1: Unmet Needs identifies that our new Local Plan period will be 2024-2040. Given the recent delay to our Local Plan preparation, we do not currently have a specified plan period and thus, this should be recorded as unknown. If there are other references to our plan period in the rest of the documentation, this should similarly be recorded as unknown. We will of course advise you of our plan dates once these are confirmed.

As officers, we recognise that the close and constructive working between authorities have been beneficial and can confirm that we will seek to maintain this relationship as our Local Plans advance towards adoption. It is unfortunate that we are not able to provide certainty in our response to the matters identified in your letter at this time. We are hopeful that, following the upcoming elections and in response to your formal Regulation 19 publication period, the Council will be in a better position to provide a more detailed reply.

I hope that the letter is clear. If you require clarification, please contact Tal Kleiman, Senior Planning Policy Officer on 01403 215213 or tal.kleiman@horsham.gov.uk in the first instance.

Yours sincerely,



Catherine Howe
Head of Strategic Planning

18 April 2023

Clem Smith
Head of Economy and Planning
Crawley Borough Council
Town Hall
The Boulevard
Crawley
West Sussex RH10 1UZ

Dear Mr Smith,

Thank you for your letter of 14 April 2023. Please find below answers to your specific questions.

Can Mole Valley District Council take Crawley Borough Council's unmet housing need? Mole Valley District Council (MVDC) submitted its Local Plan in February 2022 and so has been under examination for over a year. In December 2022, the Inspector issued her post-hearing comments and advised MVDC that it could progress the plan to a Main Modifications consultation. For the time being, however, the examination is paused until the national policy picture is clearer with regard to Green Belt release. Therefore, at this time in the plan preparation cycle, MVDC would be unable to take any unmet need from any other authority.

Even if MVDC were at an earlier stage in the plan preparation cycle, it would be unable to meet unmet housing need from other authorities. 77% of MVDC's area is designated as either Green Belt or Area of Outstanding Natural Beauty. The built-up area only comprises 11% of the area and the two principal towns, Leatherhead and Dorking, are historic market towns with significant and extensive heritage constraints limiting development to little more than very gentle densification. As a result of these constraints, MVDC's draft local plan, as submitted, is only meeting 75% of its own need before it considers need from outside its borders.

Can Mole Valley District Council take Crawley Borough Council's unmet affordable housing and self and custom-build house need?

MVDC's stage in the plan-making cycle precludes it from being able to take unmet need.

As regards affordable housing in particular, on its submitted plan, MVDC can only just meet its affordable housing need and that relies on a number of 100% schemes. In respect of self- and custom-build housing, MVDC has permitted sufficient one-bedroom properties to meet its need with little leeway.

Finally, MVDC considers that the Statement of Common Ground, as signed on 25 January 2021, remains valid and is not in need of updating.

I hope this sets out MVDC's position clearly and I am sorry MVDC cannot be of more assistance.

Yours sincerely,

D Clarke

Duncan Clarke
Planning Policy Manager
Mole Valley District Council



Planning Policy

Date: 28/04/2023

Dear Strategic Planning,

Crawley Borough Submission draft Local Plan 2024 – 2040: Duty to Cooperate

Thank you for your letter dated 14 April 2023 and for presenting the opportunity to comment on your Draft Duty to Cooperate Statement (May 2023), and the Draft Unmet Needs and Duty to Cooperate Topic Paper (May 2023).

It is understood that the Crawley Borough Local Plan 2024-2040 Reg 19 will commence formal consultation on May 9th which Reigate & Banstead wish to be consulted on. The comments presented here are strictly on the Draft Duty to Cooperate Statement and the Draft Unmet Needs and Duty to Cooperate Topic Paper.

Within the Draft Unmet Needs and DtC Topic Paper, paras 2.1.3 – 2.1.4 state that Crawley function in the identified housing market area of Northern West Sussex (NWS) which extends northwards to Reigate and Banstead to a lesser degree, in Horley. It is important to note that Reigate and Banstead Borough Council (RBBC) as a whole, operate in the East Surrey housing market and differ to functioning wholly in the NWS housing market area and would like to see that reflected in the wording.

We fully appreciate Crawley Borough Council (CBC) developing the Statement of Common Ground with us in 2021 and our position has not notably altered since this agreement. RBBC are dedicated to assist CBC in the strategic cross boundary issues including unmet housing need, although as our adopted Local Plan states, RBBC does not seek to meet a specified quantum of CBC's unmet need. This is reflected in the Statement of Common Ground agreed by both parties in 2021, with note to RBBC not in a position to meet any of CBCs unmet housing need. It's also understood that both authorities will each seek to meet their own need for additional Traveller provision.

The Crawley Draft Duty to Cooperate Statement correctly identifies RBBC in the numerous groups and partnerships, including Gatwick Diamond Local Authorities group. It is appreciated that our duty to cooperate exists outside of these groups on a bespoke basis. RBBC's Development Management

Plan (DMP) allocation HOR9, Horley Strategic Business Park, is committed to meet strategic employment needs, which is identified by CBC to meet a significant proportion of Crawley's identified office needs. RBBC remain committed to working with Crawley on this basis but would like to emphasise the allocation is for B1a purposes with limited B1b, B1c, B8, and non-B Class uses including appropriate airport-related Sui Generis uses. As part of the Gatwick Diamond Local Authorities group, RBBC is committed to providing jobs for the wider area as stated in para 1.4.11 of the Crawley Draft Duty to Cooperate Statement, however it fails to mention that RBBC's priority must be the needs of the borough.

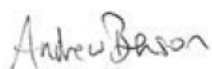
Just a minor amendment within the Draft Duty to Cooperate Statement that you may want to consider in para 3.3.11 where it is perhaps missing the word 'supply', after the words 'anticipated to', when referring to the HOR9 employment floor space.

On matters of flooding, in particular to the cross-boundary flooding issues, RBBC will continue to work cooperatively to resolve the water stress constraints our two authorities face. The output of the Gatwick Sub-Region Water Cycle Study jointly commissioned in 2020 being one example of how we can successfully work together to assess the water impacts.

As part of the Gatwick Joint Local Authorities Group and Gatwick Officers Group, RBBC will continue to work with CBC in coordinating responses to Gatwick Airport DCO, including issues around: landscape, housing, infrastructure, noise pollution, flooding, employment, etc. The implications of the DCO have considerable constraints to both our boroughs and so RBBC are happy to continue working with CBC in a cooperative way.

Overall, RBBC do not find any significant conflict or errors in both the Draft Duty to Cooperate Statement and the Draft Unmet Needs and Duty to Cooperate Topic Paper. We look forward to engaging in your upcoming Borough Local Plan 2024-2040 Reg 19 consultation after May 9th, and we look forward to our continuing duty to cooperate.

Yours Sincerely,



Andrew Benson
Head of Planning

05 May 2023

Elizabeth Brigden
Planning Policy
Crawley Borough Council

By email only

Dear Elizabeth

Crawley Borough Submission draft Local Plan 2024 – 2040: Duty to Cooperate

Thank you for your letter dated 14 April 2023 about the progression of your Local Plan and identified unmet needs for homes.

The SDNPA is at the earliest stages of starting its Local Plan Review (LPR). The timetable for the Local Plan Review was most recently agreed at our full [National Park Authority meeting on 14 December 2022](#). An evidence study of development need has been commissioned. In addition, a call-for-sites for development, biodiversity net gain offsetting, nutrient offsetting and renewable energy was carried out in Summer 2022; assessments of these sites are underway.

Paragraph 176 of the NPPF states that national parks have the highest status of protection in relation to landscape and scenic beauty. The NPPF also states that the scale and extent of development within all these designated areas should be limited. The PPG also says national parks “are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas” (Paragraph: 041 Reference ID: 8-041-20190721). Paragraph 28 of the National Parks Vision and Circular 2010 says the Authorities’ primary responsibility is to deliver their statutory purposes, and in achieving sustainable development, helping rural communities in particular to thrive. Furthermore, Section 62 of the Environment Act 1995 requires all relevant authorities, including Crawley Borough Council, to have regard to the purposes of the National Park. It is therefore unlikely that the South Downs National Park will be able to accommodate any unmet need arising in Crawley Borough outside the National Park.

We can confirm that we are committed to continued liaison and joint working towards achieving effective outcomes and we wish you well with the progression of your Local Plan. If you have any questions about the content of this letter, please do not hesitate to contact me.

Yours sincerely



Claire Tester
Planning Policy Manager
Claire.Tester@southdowns.gov.uk

Ms Elizabeth Brigden
By email

Nichola Watters
Head Of Planning Policy,
Economy & Climate Change

Dear Ms Brigden,

Re: Crawley Borough Submission draft Local Plan 2024 – 2040: Duty to Cooperate

Thank you for your letter dated 14 April 2023 in relation to the Crawley Borough Local Plan 2024 -2040 that was approved for publication and submission at its Full Council meeting held on 22 February 2023. It is noted that the public consultation is taking place for a 6-week period and commenced on Tuesday 9 May until Tuesday 20 June 2023. In addition, within this letter, there was a formal request as to whether Wealden District Council (WDC) could play a role in assisting Crawley Borough Council (CBC) in addressing identified unmet development needs under the Duty to Cooperate provisions.

The formal request set out in your letter refers to WDC accommodating some, or all of CBCs unmet housing needs, which amounts to 7,050 dwellings over the proposed Plan period (2024 – 2040). It was stated in your letter that you estimate at the time of writing that there is sufficient land within CBCs administrative boundaries to build a minimum of 5,030 dwellings, or approximately 42% of CBCs housing need within the borough. Our response to this request is set out below.

Background

Following a letter from the Planning Inspectorate relating to stage one of the Examination in Public (EiP) process in 2019, WDC withdrew the Draft Wealden Local Plan (January, 2019) following a Full Council meeting held on 19 February 2020. The Council has since adopted an updated Local Development Scheme (LDS)¹ in July 2020 and has commenced work on a new local plan, including undertaking an eight-week early consultation², which concluded on 18 January 2021. The next formal stage in the plan making process will be the Regulation 18 consultation on a

¹ [WDC Local Development Scheme 2020-2023](#)

² [Wealden Local Plan – Direction of Travel Consultation](#)

Draft Local Plan. The Regulation 18 consultation has been delayed in part due to the confirmation that Government was to consult on the 'Levelling-up and Regeneration Bill: reforms to national planning policy', which it did in December 2022. The Council responded to this³ and the Government has indicated that it would respond to this consultation feedback by spring 2023, publishing the NPPF revisions as part of this. WDC feels it is prudent to plan for the basis of an updated NPPF in later spring. Given the above, we are likely to publish our Regulation 18 Local Plan for consultation in late summer/early autumn 2023, which will cover both proposed site allocations and development management policies. The Council has not formally updated its LDS as this is subject to the actual timing of the NPPF updates and extent of what may be proposed and so at this point the exact timing remains uncertain.

As part of our early work on a new local plan, we have progressed work on the Strategic Housing and Economic Land Availability Assessment (SHELAA) and have undertaken a 'call for sites'. The 'call for sites' ran from 1 June 2020 to 10 August 2020, however, we have continued to accept new sites to our SHELAA throughout the plan-making process. We have mapped these sites and we have made all of the sites submitted publicly available via our [online mapping system](#). However, we have not yet finalised the review of our existing SHELAA sites. We cannot therefore confirm the suitability or capacity of the sites submitted for growth at this stage. This means that we are not able to confirm whether we have the land available to deliver our own housing growth or indeed any unmet needs from other local authorities including CBC.

Wealden District is a highly constrained authority with over 53%⁴ of the district being located within the High Weald Area of Outstanding Natural Beauty (AONB), predominantly in the northern part of the district. The district also contains part of the South Downs National Park (SDNP), with over 7% of the district falling within the National Park area. Thus together, the High Weald AONB and the SDNP cover some 60% of the district, in formal recognition of its landscape quality⁵. The local authority area also contains the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA) and the Pevensy Levels SAC and Ramsar site that are European / internationally designated biodiversity sites. Almost 10% of the district is covered by these sites alongside other Sites of Special Scientific Interest (SSSI)⁶. There are a number of other notable constraints in the district such as infrastructure provision (particularly major highway constraints and required improvements), Ancient Woodland and land that falls within Flood Zones 2 and 3.

In terms of the Council's own housing needs requirement, under the current 'standard method' described in paragraph 61 of the National Planning Policy Framework (NPPF) (July, 2021), this equates to 1,200 dwellings per annum (dpa). Over a twenty-year plan period, this equates to a total of 24,000 dwellings to be delivered, excluding any potential unmet housing needs of other neighbouring local

³ [Wealden District Council Response to the 'Levelling-up and Regeneration Bill: reforms to national planning policy', March 2023](#)

⁴ [The High Weald AONB Management Plan 2019-2024](#)

⁵ [WDC Core Strategy Local Plan. Adopted February 2013](#)

⁶ It is noted that the some of these SSSIs are located within the High Weald AONB also.

authorities. The Council will aim to meet its own housing needs through its new local plan, but given the constraints listed above, whether we can meet our own needs will need to be tested through the Council's local plan process, including its evidence base that we are still progressing. We are part way through this process, and we are therefore unable to confirm at this time whether we can meet our own housing needs. A key element of our local plan evidence will be transport modelling and testing options to assess the capacity of different locations for growth, which we are undertaking in partnership with all East Sussex local authorities.

Consideration of Unmet Housing Need from Crawley Borough Council (CBC)

Housing Market Area (HMA)

The Wealden Local Housing Needs Assessment (LHNA)⁷ was published in August 2021. The previous Wealden Strategic Housing Market Assessment⁸ (August 2016) took a Wealden centric view of the Housing Market Area (HMA), and identified one large HMA which covered Wealden, Mid-Sussex District Council, Lewes District Council, Eastbourne Borough Council, Rother District Council and Tunbridge Wells Borough Council.

However, the latest LHNA report for WDC (August, 2021) concludes that Wealden is instead overlapped by a number of different HMAs, which cross and fall within the district boundary in several locations. The Wealden LHNA confirms that the migration analysis undertaken identified that Wealden has close links to Eastbourne and to a lesser degree with Tunbridge Wells and Lewes. In terms of the commuting analysis, this illustrates the main commuting routes for Wealden residents are to Eastbourne, Tunbridge Wells, Lewes and Mid Sussex. In terms of the LHNA conclusions, it is only suggested that a small, predominantly rural part of Wealden (incorporating Forest Row) to the northwest of the district overlaps with the Northern West Sussex HMA and this HMA only incorporates 6% of Wealden's own population or around 2% of the overall HMA population.

The latest information on the HMA for Crawley Borough Council was identified in the Northern West Sussex Strategic Housing Market Assessment (November, 2019)⁹ that confirms that evidence continues to support the definition of a Northern West Sussex HMA which is comprised, as a best fit to local authority boundaries, of Crawley, Horsham and Mid Sussex. It is recognised however that there is some evidence of an overlap with other local authorities, albeit Wealden is not specifically defined in this study, and this more relates to Surrey authorities to the north and the Coastal West Sussex HMA (that incorporates parts of Lewes District and Mid Sussex District).

Given the above, the evidence shows a limited interaction between Wealden and Crawley in terms of those linkages. In addition, the administrative boundary of CBC is not shared with WDC and it is considered that the linkages shown in Wealden's LHNA with the Northern West Sussex HMA are likely to stem from Mid Sussex District (particularly, East Grinstead) rather than Crawley.

⁷ [Wealden Local Housing Needs Assessment. August 2021.](#)

⁸ [WDC Strategic Housing Market Assessment \(SHMA\), August 2016](#)

⁹ [Northern West Sussex Strategic Housing Market Assessment \(November, 2019\)](#)

As noted above, the overlap with Northern West Sussex HMA in Wealden is limited to a rural area that includes Forest Row, and whilst not wishing to pre-empt the Local Plan process, it is considered that there will likely be only very limited opportunities for further growth, given the constraints in that location that includes the High Weald AONB, flood risk and the Ashdown Forest SPA. The growth of other sustainable settlements within the south of Wealden District, such as Uckfield, Hailsham or other settlements on the outskirts of Eastbourne (i.e. Polegate, Stone Cross, Willingdon, Westham) also fall outside of the Northern West Sussex HMA. Given this, any growth in these locations are unlikely to fulfil the housing needs of CBC specifically.

Wealden is influenced by a number of larger towns close/adjacent to its administrative boundaries. In particular, the evidence shows that the southern part of Wealden has a particularly strong relationship with Eastbourne. Eastbourne Borough has a number of constraints including flood risk, heritage and significantly their administrative boundaries that tightly surround the existing urban area and we have entered into early discussions as to whether it will be possible to meet some, or all of Eastbourne's housing/employment needs. Eastbourne Borough Council have formally requested whether WDC is able to take some or all of their housing and employment needs. These discussions will be progressed as we progress through the respective local plan productions.

Sustainability of New Development

Paragraph 73 of the NPPF (July, 2021) states that 'the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)'. Paragraph 105 of the NPPF (July, 2021) states that 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'. Given our comments earlier regarding the constraints of Forest Row (which is located within the Northern West Sussex HMA), it is considered, on sustainability grounds alone, it would be better to address unmet development needs of CBC within and/or adjacent to large regional centres, where jobs, sustainable transport links and retail are largely located. This would be in line with national planning policy on this matter. Substantial development away from these areas, particularly within the High Weald AONB designation, in a rural area, would be considerably less sustainable and may exacerbate existing out-commuting patterns from Wealden District.

Infrastructure

WDC, as part of its local plan process will also need to consider its existing infrastructure constraints and to test how and where we can accommodate growth, including the strategic road network. It is not yet known whether WDCs own development needs can be met through its existing infrastructure and/or what new infrastructure is required to deliver growth in the longer term.

As part of our local plan production, we are working with East Sussex County Council and other local authority partners (Eastbourne, Rother, the South Downs National Park Authority, Lewes and Hastings) to test growth options, specifically in relation to existing road networks. A countywide transport model has been devised for this purpose. We will also need to consider as part of our growth strategy whether an offline A27 and indeed whether other mitigation at key junctions or roundabouts will be required to support growth. RIS2 was published in March 2020 and identifies further work that will be undertaken in order to progress developing proposals for the A27 between Lewes and Polegate as a potential pipeline scheme for construction between 2025 and 2030. We will need further clarification as to the potential of this scheme in order to inform housing delivery and options for delivery. In the meantime, we are waiting to hear the outcome of a Major Road Network (MRN) bid to support the delivery of a number of junction improvements for the A22/A27 to facilitate growth. We hope to know more on this shortly.

Conclusions

WDC has identified a number of issues above that demonstrate that meeting our own housing requirement will be challenging and this will need to be tested through the local plan process. Once we have understood this, we will then be in a position to consider whether we can meet any unmet needs from adjacent local authorities.

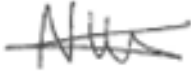
Paragraph 24 of the NPPF (July, 2021) confirms that 'local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on a strategic matter that *cross administrative boundaries*' (our emphasis). Furthermore, paragraphs 11 and 35(a) of the NPPF (July, 2021) talks directly to the unmet needs from 'neighbouring areas'. As noted elsewhere, WDC does not share an administrative boundary with CBC and we are therefore under no obligation to consider such matters between the authorities.

However, turning to your specific request, we are clear that given the geography of the Northern West Sussex HMA and the physical distance from Crawley, the options for WDC to take some or all of this need would be less sustainable than the alternative of delivering this growth either within the CBC area or its adjoining authorities. Put simply, any solution would either be to build in a rural part of WDC in an unsustainable location, within the High Weald AONB, or to seek to build outside the small, shared element of the HMA, thereby not meeting the needs of CBC residents.

Given the above, WDC would not be able to commit at this stage of its plan-making process that it could deliver the suggested amount of unmet housing needs of CBC. However, the Council is developing its evidence base for its new Local Plan and will naturally consider any changes to its evidence base as it progresses through the relevant plan-making stages.

I trust that the above comments are helpful and clear at this stage. If you have any further queries, then please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N Watters', with a horizontal line drawn through the middle of the letters.

Nichola Watters

Head of Planning Policy, Economy and Climate Change

From: [Claire Potts](#)
To: [Brigden, Elizabeth](#)
Cc: [Karen Sinclair](#); [Valerie Dobson](#); [Tony Whitty](#)
Subject: Crawley Borough Local Plan: Duty to Cooperate - Chichester District Council
Date: 28 April 2023 14:47:52

Dear Elizabeth,

In response to your email requesting any factual corrections on the Duty to Cooperate Statement and draft Unmet Needs Topic Paper, please see comments below:

Table 1.1 Framework for Cooperation:

Under One to One discussions with other local authorities – should this include Chichester DC?

Under Appendix H and I – Jan 2020 letter. CDC did provide a response so should be listed in Appendix I. I can send a copy if you need one for the record.

We have also sought to enter into a Statement of Common Ground with CBC which we sent for comment in January, but haven't had comments back yet. It would be helpful to have any comments on the draft so it can be progressed. It is worth listing under Table 3.2 under one-to-one discussions, or does that table only list SoCG that you have initiated?

In relation to the Topic Paper, we have no comments.

We will respond formally to the letter separately.

Kind regards

Claire



Claire Potts

Planning Policy Team Manager
Planning Policy
Chichester District Council

Ext: 21274 | Tel: | cpotts@chichester.gov.uk | Fax: |
East Pallant House opening hours: 9am-4pm Monday to Friday



LEGAL DISCLAIMER

From: [Tony Whitty](#)
To: [Brigden, Elizabeth](#)
Cc: [Valerie Dobson](#); [Claire Potts](#); [Karen Sinclair](#)
Subject: FW: Crawley Borough Local Plan: Duty to Cooperate - Chichester District Council
Date: 28 April 2023 15:50:29
Attachments: [~WRD0082.jpg](#)
[CBC letter DiC and Unmet Needs April 2023.pdf](#)
[Crawley 2040 Duty to Cooperate Statement April 2023.pdf](#)
[Topic Paper 1 Unmet Needs and DiC.pdf](#)

Hi Elizabeth,

I'm aware that Claire Potts has responded to you today on a number of matters, but for the avoidance of doubt, with regard to meeting unmet housing need, we will provide a formal response through either your reg 19 consultation or a statement of common ground. However, informally, as you are aware, Chichester District Council is unable to meet it's own need. We have established this through a robust sustainability appraisal looking at higher growth options in the north east of our district. Therefore we will not be in a position to meet any unmet need from Crawley.

Let me know if you have any further questions.

Regards



Tony Whitty

Divisional Manager
Planning Policy
Chichester District Council

Ext: 34875 | Tel: 01243534875 | twhitty@chichester.gov.uk | Fax: 01243 776 766 |

<http://www.chichester.gov.uk>

East Pallant House opening hours: 9am-4pm Monday to Friday



From: Brigden, Elizabeth <Elizabeth.Brigden@crawley.gov.uk>
Sent: 14 April 2023 10:40
To: Tony Whitty <twhitty@chichester.gov.uk>; Valerie Dobson <vdobson@chichester.gov.uk>
Subject: [EXTERNAL] Crawley Borough Local Plan: Duty to Cooperate - Chichester District Council

This Message originated outside your organization.

Dear Tony/Valerie,

You will be aware that the Crawley Borough Local Plan 2024-2040 was recently approved at Full Council for its Publication Consultation (Regulation 19) and Submission for Examination. The formal public consultation is scheduled to commence on Tuesday 9 May 2023.

Please find attached the emerging Duty to Cooperate Statement which has been updated to

support the Local Plan consultation. I would be grateful if you are able to check through this document and let me know if there are any factual corrections you would like me to make before it is made publicly available. Please do also let me know if it contains anything which is of concern to you. For your information, I have also attached a draft Unmet Needs Topic Paper, which will also be published to support the Local Plan consultation. Similarly, please do let me know if you have any comments or changes you need me to make.

For both of these documents, I will need any comments back by **Friday 28 April 2023** at the latest, to be able to take it into account for the consultation versions.

In addition, please find attached a letter from Crawley Borough Council to your authority setting out Crawley's unmet needs, and requesting a response in relation to the potential for meeting these needs. A formal response to this letter, along with any formal detailed comments you have on the above mentioned documents, can occur any time until the close of the Regulation 19 consultation, either for a further conversation/agreement as part of the Duty to Cooperate or as your formal representations (consultation is due to close on 20 June 2023).

Hopefully we will have the Water Neutrality Statement of Common Ground agreed in time for the submission of the Crawley Borough Local Plan, but please do let me know if you can think of any other reason we should consider preparing one.

I look forward to hearing from you. Please do not hesitate to contact me for any clarification on the above or attached.

Kind Regards
Elizabeth

Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council

www.crawley.gov.uk/planning



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From: [Andrew Marsh](#)
To: [Brigden, Elizabeth](#); [Alice Henstock](#)
Subject: RE: Crawley Borough Local Plan: Duty to Cooperate - Mid Sussex District Council
Date: 28 April 2023 16:00:45
Attachments: [image001.png](#)

Dear Elizabeth,

Thank you for sharing your draft Duty to Co-Operate Statement and accompanying Unmet Need Topic Paper. We appreciate the opportunity to provide informal comments ahead of publication and hope the below are helpful for you. Whilst we have reviewed the documents and provide the below at an officer level, these are without prejudice to any additional comments that we may wish to make formally during your upcoming Regulation 19 consultation if necessary. Most are factual changes, however there are some queries that may require further discussion.

As always, if you wish to discuss further or require any clarifications, please do not hesitate to give me a call or we can find some time in our diaries to meet. Best of luck with all the collating/printing/distributing of consultation material – always a mammoth task!

Kind regards,
Andrew

===

DTC Statement

1.1.4. Physical constraints are mentioned (flood risk and AONB) however it would be useful to provide the % of the borough impacted by these to provide context. As you know, Mid Sussex is 50% AONB which we consider significant.

1.4.2 – 1.4.5. These paragraphs provide useful history however we question whether this is the most 'up-to-date' position as implied by some of the wording. This predominantly relates to the current adopted plans rather than the suite of 'reviews' which are based on very different housing need/supply figures.

1.4.6 (Table 1.4). This shows quite a swing from under-provision to significant over-provision. It would be helpful to understand the reasons for this, and whether there is potential for this to continue into the new plan period i.e. potential for the unmet need to be less.

1.4.8 – 1.4.9. It is unclear whether this is setting out the current position, or the position 'as at' adoption of the Mid Sussex District Plan in 2018. If the former – we understand that HDC does not currently have a 5-year housing land supply. If the latter, is this relevant to the suite of reviewed plans?

3.1.11. It is noted that the housing supply close to administrative boundaries only counts towards meeting the housing requirement in MSDC/HDC. This isn't correct given the contributions by HDC/MSDC towards CBC unmet needs in current plans. It would be helpful to clarify this, and that in practice even if it were not 'assigned' or 'counted' towards the numbers arithmetically, given their location they are very likely to be accommodating some need from Crawley (given, for example, over 90% of MSDC need is due to in-migration), particularly as nomination rights for affordable housing have been agreed at Pease Pottage.

3.1.13. Should be noted that adjoining areas are also subject to similar constraints and that, ultimately, it is for each LPA to determine its most sustainable and deliverable strategy for meeting housing need, including unmet need.

3.1.17. This para is referring to the adopted Plans. The tense of this paragraph may be taken out of context to apply to the work/agreement on the current DP reviews. E.g. "Similarly, each authority within the area considers it is doing the maximum reasonable to meet the objectively assessed housing needs of the area as a whole, taking into account local constraints, local aspirations and the need for sustainable development". If this does reflect the current position then, for consistency, the same language should be used in the Housing Statement of Common Ground.

3.1.18. It is acknowledged that the housing position is becoming more challenging however suggest the last sentence reads "before including any additional amount..." rather than "without" as this position has not yet been concluded.

3.1.20. This para should also reference the previous evidence that CBC need could be met anywhere within MS due to transport movements (position was evidenced for the Mid Sussex District Plan).

3.1.21 Table 3.2.

May be worth noting that the NWSPS may need to be updated or elements superseded by the Housing SoCG as the 2020 version relates to previous plan periods and respective housing need at that time.

Under "Crawley Borough and Mid Sussex District", Crabbet Park is referred to as a "new neighbourhood for Crawley" - Crabbet Park is within Mid Sussex and there is no agreement that it would be a 'new neighbourhood' so suggest it is referred to as a Sustainable Community as described in the draft District Plan.

Note reference to the current SoCG between CBC and MSDC however this was prepared for the MSDC Site Allocations DPD therefore question whether it is relevant for the Local Plan Review.

3.8.8 Table 3.9 Whilst we've signed up to the GCN scheme, question whether this is a DTC outcome?

Page 55 Map. It would be best to replace this with the maps set out in the SHMA given the HMA overlaps and textual context on this is important, as discussed within the draft Housing SocG.

Appendix C. Whilst we do not disagree with the lists/dates of meetings that have taken place, we question the relevance of any that occurred before the Local Plan review commenced. For instance, one example shows MSDC/CBC portfolio holders met in 2017- this was before the MSDC District Plan was adopted and is therefore not related to the current set of plan reviews. Are the dates listed for the WS&GB meetings helpful and/or to be published in the public domain?

Appendix E. This appears to be the trajectory for the current suite of Local Plans rather than the updated picture as at today, therefore question the relevance given the housing need and supply have dramatically changed since then (e.g. MS adopted the Sites DPD, Water Neutrality implications, etc) so would suggest this is updated.

Topic Paper

1.3. Mentions that the Topic Paper highlights the 'outcomes', are these listed/clear?

1.4. Have CBC done any work looking at planning permissions which could be self and custom build? Would be useful to have an up-to-date picture. MSDC has carried out a similar exercise so can advise if needed.

2.1. As above, this provides useful history however it needs to be set in the context that the position has changed significantly since the Local Plans were adopted and we cannot necessarily rely on the outcomes/findings reached for those plans.

2.1.9. The additional 996 needs to be added to Table 2 to show that there is an over-supply rather than under-supply. In addition, it would be useful for there to be some commentary on why the 966 occurred i.e. why was this not predicted during the Local Plan Process? Is this a 'one off' or is there potential for it to occur again? The implications of this are significant given pressure on neighbours to assist with unmet need. Would it be helpful to reference delivery implications from covid/water neutrality?

3.1.3. Are the 'new approaches to achieve this' factored in to the supply trajectory proposed i.e. is there a possibility that these figures will be exceeded?

3.1.4 Note that the plan period (2040) extends beyond the MS plan period (to 2039) therefore will need to account for this as we did in the current suite of plans.

3.1.5 Suggest the words "insofar is consistent with national policy and delivery of sustainable development. This will need to be demonstrated through the evidence for the respective Local Plans" or similar

3.1.6 Need to be careful with tense – this relates to the current plans rather than 'review' plans.

3.1.7 Table 3. The Local Plan target for Mid Sussex in the draft Reg18 plan works out at 1,119dpa plus the over-supply of 302 (i.e. 17dpa). Therefore overall the MS draft plan proposed 20,444 divided by 18 years – 1,136dpa.

3.1.11 Refers to CP as a 'new neighbourhood', suggest it reflects the language used in the draft District Plan "Sustainable Community" (as above)

3.1.12 The final paragraph is not evidenced. Crabbet Park, for instance, is to be designed as a "Sustainable Community" providing essential services and facilities on-site so that it is not reliant on such facilities in adjoining areas. Although details are not yet confirmed, it has potential to provide some facilities (such as secondary education) which could alleviate rather than exacerbate pressures in Crawley. Also, suggest that the environmental impact of Crabbet Park is more significant for Mid Sussex (rural area, adjacent to AONB) than for the built-up area of Crawley.

3.2.1 To note, I'm not aware that MSDC has been involved with the 2023 EGA update.

4.2 Whilst this is true, we question how relevant the "resolving unmet needs" in previous plans is, given that this DTC statement is referring to the current plans where no such agreement is currently in place – albeit it is a work in progress.

4.3 This para outlines the discussion held, however would be useful to set out any outcomes from these. Also need to refer to Crabbet Park as a "sustainable community" rather than new neighbourhood, as described above.

===



Andrew Marsh

Head of Planning Policy and Housing Enabling

01444 477488

andrew.marsh@midsussex.gov.uk

www.midsussex.gov.uk

Text, letter   Description automatically generated



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From: Brigden, Elizabeth <Elizabeth.Brigden@crawley.gov.uk>
Sent: Friday, April 14, 2023 10:41 AM
To: Andrew Marsh <Andrew.Marsh@midsussex.gov.uk>; Alice Henstock <Alice.Henstock@midsussex.gov.uk>
Subject: Crawley Borough Local Plan: Duty to Cooperate - Mid Sussex District Council

Dear Andrew/Alice,

You will be aware that the Crawley Borough Local Plan 2024-2040 was recently approved at Full Council for its Publication Consultation (Regulation 19) and Submission for Examination. The formal public consultation is scheduled to commence on Tuesday 9 May 2023.

Please find attached the emerging Duty to Cooperate Statement which has been updated to support the Local Plan consultation. I would be grateful if you are able to check through this document and let me know if there are any factual corrections you would like me to make before it is made publicly available. Please do also let me know if it contains anything which is of concern to you. For your information, I have also attached a draft Unmet Needs Topic Paper, which will also be published to support the Local Plan consultation. Similarly, please do let me know if you have any comments or changes you need me to make.

For both of these documents, I will need any comments back by **Friday 28 April 2023** at the latest, to be able to take it into account for the consultation versions.

In addition, please find attached a letter from Crawley Borough Council to your authority setting out Crawley's unmet needs, and requesting a response in relation to the potential for meeting these needs. A formal response to this letter, along with any formal detailed comments you have on the above mentioned documents, can occur any time until the close of the Regulation 19 consultation, either for a further conversation/agreement as part of the Duty to Cooperate or as your formal representations (consultation is due to close on 20 June 2023).

I have attached the most recent NWS SoCG for your information/assistance. Hopefully, we will also have the updated NWS – Housing SoCG finalised in time for the submission of the Crawley Local Plan. I have also attached our bilateral SoCG which was prepared for your Site Allocations

DPD – it would be helpful to consider whether this could be updated for our current Plans or if we should commence a new one (it is quite specific and possibly has been overtaken by your District Plan Review).

I look forward to hearing from you. Please do not hesitate to contact me for any clarification on the above or attached.

Kind Regards
Elizabeth

Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council

www.crawley.gov.uk/planning



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From: [Katharine Stuart](#)
To: [Brigden, Elizabeth](#)
Cc: [Claire Tester](#)
Subject: RE: Crawley Borough Local Plan: Duty to Cooperate - South Downs National Park
Date: 28 April 2023 15:35:08
Attachments: [image001.png](#)

Dear Elizabeth,

Thank you for the opportunity to comment on both the Duty to Cooperate Statement and Topic Paper 1 Unmet Needs and DtC.

We welcome and support references in the Duty to Cooperate statement to the joint working that both CBC and SDNPA are engaged with, for example water neutrality in the Sussex North WRZ and Ashdown Forest air quality work. We note the location of CBC within the Northern West Sussex Housing Market Area. We welcome sight of the topic paper on unmet needs noting that HMA boundaries by their nature tend to be 'fuzzy' and tend to have some overlap.

In addition, I have a some specific detailed comments/queries on the Duty to Cooperate Statement:

1. Table 3.8, page 47. I understand this table to be about water neutrality. The second to last row references the water neutrality statement of common ground which is in preparation. The last row references 1to1 statements of common ground with Horsham and Mid Sussex. Are these on the subject of water neutrality, or does this refer to wider statements of common ground which touch on the joint water neutrality work? I ask because if it is the former, then I would like to check with you whether there are any 1to1 matters regarding water neutrality that would require a statement of common ground between ourselves as well?
2. Paragraph 3.8.7. The Hampshire GCN DLL is emerging but not yet established and operational.
3. Appendix C –
 - The rows outlining the West Sussex and Greater Brighton partnership work define membership as 'district and county councils'. The SDNPA are part of the group and as we are not a district or county council we don't appear to be in scope of the membership outlined in the statement. I would suggest either referencing 'local planning authorities' as a catch all, or adding in SDNPA specifically to the membership list.
 - The above also applies to the row for PPOG, the Biodiversity Record Centre steering group, Sussex Nature Recovery Working Group, and Sussex LNP LA Network.
4. Page 100 – Natural England endorsement – suggest this be 'Natural England to the above local planning authorities' to include SDNPA as we are in the list.
5. Page 100 – publication of the Part C report – suggest this also includes SDNPA in list on the basis that SDNPA fed in data, attended working group meetings and provided comments like NE, EA and SW in the list.

We will review and come back to you regarding the letter noting the deadline of 20th June.

If you have any questions or it would be helpful to discuss the above, please do let me know.

Kind regards
Katharine

Katharine Stuart
Planning Policy Lead
South Downs National Park Authority
Direct Tel: 01730 819281 Work Mobile: 07557 853260

Please note that we are experiencing a temporary number of vacancies that is impacting some areas of our planning service at the South Downs National Park Authority. We are working actively to recruit new staff and are committed to filling all posts within the Planning Department. We would be grateful for your understanding and patience during this time, as we may be unable to deal with all matters within normal specified timeframes. As always, our goal is to deal with matters as efficiently as possible and we hope to be in a position to meet our normal specified timeframes within 4 to 5 months. Thank you.

Our latest Planning Newsletter can be read here: [Winter Planning Newsletter](#)

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From: Katharine Stuart
Sent: Friday, April 14, 2023 11:08 AM
To: 'Brigden, Elizabeth' <Elizabeth.Brigden@ Crawley.gov.uk>
Cc: Claire Tester <Claire.Tester@southdowns.gov.uk>
Subject: RE: Crawley Borough Local Plan: Duty to Cooperate - South Downs National Park

Dear Elizabeth,

Thank you for your email. We will review and come back to you - noting the deadline of Friday 28th April for the first part and 20th June for the second part.

I can't immediately think of a reason for a further statement of common ground between our LPAs in addition to the water neutrality and Ashdown Forest ones, but I will come back to you if we have further thoughts on this!

Re. Ashdown Forest, the 2018 version is useful to have and I believe it is with Wealden for drafting the next version following getting the transport modelling work going, which I hope isn't

too far away now.

Kind regards
Katharine

Katharine Stuart
Planning Policy Lead
South Downs National Park Authority
Direct Tel: 01730 819281 Work Mobile: 07557 853260

Please note that we are experiencing a temporary number of vacancies that is impacting some areas of our planning service at the South Downs National Park Authority. We are working actively to recruit new staff and are committed to filling all posts within the Planning Department. We would be grateful for your understanding and patience during this time, as we may be unable to deal with all matters within normal specified timeframes. As always, our goal is to deal with matters as efficiently as possible and we hope to be in a position to meet our normal specified timeframes within 4 to 5 months. Thank you.

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From: Brigden, Elizabeth <Elizabeth.Brigden@crawley.gov.uk>
Sent: Friday, April 14, 2023 10:43 AM
To: Katharine Stuart <Katharine.Stuart@southdowns.gov.uk>
Subject: Crawley Borough Local Plan: Duty to Cooperate - South Downs National Park

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

Dear Katharine,

You will be aware that the Crawley Borough Local Plan 2024-2040 was recently approved at Full Council for its Publication Consultation (Regulation 19) and Submission for Examination. The formal public consultation is scheduled to commence on Tuesday 9 May 2023.

Please find attached the emerging Duty to Cooperate Statement which has been updated to

support the Local Plan consultation. I would be grateful if you are able to check through this document and let me know if there are any factual corrections you would like me to make before it is made publicly available. Please do also let me know if it contains anything which is of concern to you. For your information, I have also attached a draft Unmet Needs Topic Paper, which will also be published to support the Local Plan consultation. Similarly, please do let me know if you have any comments or changes you need me to make.

For both of these documents, I will need any comments back by **Friday 28 April 2023** at the latest, to be able to take it into account for the consultation versions.

In addition, please find attached a letter from Crawley Borough Council to your authority setting out Crawley's unmet needs, and requesting a response in relation to the potential for meeting these needs(! – I have sent it to you for completeness, not because I genuinely see an opportunity in the SDNP!). A formal response to this letter, along with any formal detailed comments you have on the above mentioned documents, can occur any time until the close of the Regulation 19 consultation, either for a further conversation/agreement as part of the Duty to Cooperate or as your formal representations (consultation is due to close on 20 June 2023).

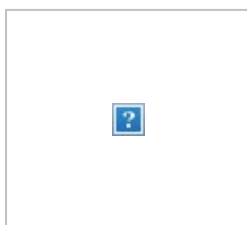
Hopefully we will have the Water Neutrality Statement of Common Ground agreed in time for the submission of the Crawley Borough Local Plan, but please do let me know if you can think of any other reason we should consider preparing one (I don't know where the update to the Ashdown Forest one is up to, but at least we have the 2018 version!)

I look forward to hearing from you. Please do not hesitate to contact me for any clarification on the above or attached.

Kind Regards
Elizabeth

Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council

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From: [Kelly Sharp](#)
To: [Brigden, Elizabeth](#)
Cc: [Nichola Watters](#); [James Webster](#)
Subject: RE: Crawley Borough Local Plan: Duty to Cooperate - Wealden District Council
Date: 28 April 2023 09:49:56
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)

Dear Elizabeth

Thank you for providing us with the emerging Duty to Cooperate Statement and the draft Unmet Needs Topic Paper. We do not have any comments on either document.

We are also in receipt of your letter regarding Crawley's unmet need. We will respond to this in due course and in line with the timescales you suggest.

In relation to the Ashdown Forest SoCG, I can confirm that this week I have managed to resolve the contract for the AF Transport model. I will update the officer group shortly. Once the work starts I will look to draft an updated SoCG for the AF air quality group and will circulate accordingly.

Kind regards

Kelly

Kelly Sharp BSc (Hons) MA MRTPI | Planning Policy Manager |
Planning Policy | Wealden District Council
07985878699
kelly.sharp@wealden.gov.uk
Council Offices | Vicarage Lane | Hailsham | East Sussex | BN27 2AX

<http://www.wealden.gov.uk>

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From: Brigden, Elizabeth <Elizabeth.Brigden@crawley.gov.uk>
Sent: Friday, April 14, 2023 10:43 AM
To: Kelly Sharp <Kelly.Sharp@wealden.gov.uk>
Subject: Crawley Borough Local Plan: Duty to Cooperate - Wealden District Council

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Dear Kelly,

You will be aware that the Crawley Borough Local Plan 2024-2040 was recently approved at Full Council for its Publication Consultation (Regulation 19) and Submission for Examination. The formal public consultation is scheduled to commence on Tuesday 9 May 2023.

Please find attached the emerging Duty to Cooperate Statement which has been updated to support the Local Plan consultation. I would be grateful if you are able to check through this document and let me know if there are any factual corrections you would like me to make before it is made publicly available. Please do also let me know if it contains anything which is of concern to you. For your information, I have also attached a draft Unmet Needs Topic Paper, which will also be published to support the Local Plan consultation. Similarly, please do let me know if you have any comments or changes you need me to make.

For both of these documents, I will need any comments back by **Friday 28 April 2023** at the latest, to be able to take it into account for the consultation versions.

In addition, please find attached a letter from Crawley Borough Council to your authority setting out Crawley's unmet needs, and requesting a response in relation to the potential for meeting these needs. A formal response to this letter, along with any formal detailed comments you have on the above mentioned documents, can occur any time until the close of the Regulation 19 consultation, either for a further conversation/agreement as part of the Duty to Cooperate or as your formal representations (consultation is due to close on 20 June 2023).

Please do let me know if you think it would be helpful for us to put together a Statement of Common Ground in advance of the revised Ashdown Forest one.

I look forward to hearing from you. Please do not hesitate to contact me for any clarification on the above or attached.

Kind Regards
Elizabeth

Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council

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From: [Waterman-Gay, Michelle](#)
To: [Brigden, Elizabeth](#); [KSLPlanning](#); [Wilson, Jennifer](#); [Davis, Huw](#)
Subject: RE: Crawley Borough Local Plan: Duty to Cooperate - Environment Agency
Date: 27 April 2023 16:40:38
Attachments: [image001.gif](#)
[image002.gif](#)
[image003.gif](#)
[image004.gif](#)
[image005.gif](#)

Dear Elizabeth

Thank you for your email and Duty to Cooperate Statement dated April 2023.

We have reviewed the document and do not have any corrections to make in the document and are satisfied with the content that it covers.

Kind regards

Michelle

Michelle Waterman-Gay - Planning Advisor - Sustainable Places, Kent

kslplanning@environment-agency.gov.uk

Telephone: 02084746762



From: Brigden, Elizabeth <Elizabeth.Brigden@crawley.gov.uk>
Sent: 14 April 2023 14:09
To: KSLPlanning <KSLPLANNING@environment-agency.gov.uk>; Wilson, Jennifer <jennifer.wilson@environment-agency.gov.uk>; Davis, Huw <Huw.Davis@environment-agency.gov.uk>
Subject: Crawley Borough Local Plan: Duty to Cooperate - Environment Agency

Dear Jen/Huw,

You will be aware that the Crawley Borough Local Plan 2024-2040 was recently approved at Full Council for its Publication Consultation (Regulation 19) and Submission for Examination. The formal public consultation is scheduled to commence on Tuesday 9 May 2023.

Please find attached the emerging Duty to Cooperate Statement which has been updated to support the Local Plan consultation. I would be grateful if you are able to check through this document and let me know if there are any factual corrections you would like me to make before it is made publicly available. Please do also let me know if it contains anything which is of concern to you.

I will need any comments back by **Friday 28 April 2023** at the latest, to be able to take it into account for the consultation versions.

Any formal detailed comments you have on the document can occur any time until the close of the Regulation 19 consultation, either for a further conversation/agreement as part of the Duty to Cooperate or as your formal representations (consultation is due to close on 20 June 2023).

I look forward to hearing from you. Please do not hesitate to contact me for any clarification on the above or attached.

Kind Regards
Elizabeth

Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council

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From: [South East ePlanning](#)
To: [Brigden, Elizabeth](#)
Subject: RE: Crawley Borough Local Plan: Duty to Cooperate - Historic England
Date: 24 April 2023 11:12:07

Dear Ms Brigden

Thank you for informing Historic England on 14 April 2023 of the updated emerging Duty to Cooperate Statement. I can confirm that as far as it affects the interests of Historic England, I have no comments to make on the draft Statement at this time.

Best regards,

Alan Byrne BSc MSc IHBC
Historic Environment Planning Adviser
(Kent, East Sussex, West Sussex, Surrey)
Regions Group, London and South East Region
Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill,
London EC4R 2YA
Direct Line: 020 7973 3654

From: [Elizabeth Cleaver](#)
To: [Brigden, Elizabeth](#)
Cc: [Planning SE](#); [Spatial Planning](#); [Warren, Ian](#)
Subject: National Highways response - Crawley Borough Local Plan: Duty to Cooperate
Date: 28 April 2023 17:33:39
Attachments: [~WRD0000.jpg](#)
Importance: High

National Highways Ref: #19789

Dear Elizabeth,

Thank you for your email (below) inviting National Highways to comment on Crawley Borough Council's emerging Duty to Cooperate Statement April 2023.

We have reviewed the document insofar as National Highway's involvement with the council's Local Plan proposals. We haven't checked all dates of meetings on pages 79 and 80, but overall the text is an accurate description of our engagement with Crawley Borough Council in relation to the Local Plan. Accordingly, we do not wish to request any factual corrections or raise any concerns before the document is made publicly available.

Thank you for giving us the opportunity to comment before publication. We look forward to our continued involvement in the Crawley Local Plan process. If you have any questions, and for future consultations, please contact us at PlanningSE@nationalhighways.co.uk.

Kind regards

Elizabeth

Elizabeth Cleaver (she/her/hers) Assistant Spatial Planner
Operations
National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ
Tel: 0300 470 1064
Web: highwaysengland.co.uk

From: Brigden, Elizabeth <Elizabeth.Brigden@crawley.gov.uk>
Sent: Friday, April 14, 2023 2:26 PM
To: Diana Ngobi <Diana.Ngobi@nationalhighways.co.uk>; Spatial Planning <SpatialPlanning@nationalhighways.co.uk>; Planning SE <planningse@nationalhighways.co.uk>
Cc: Warren, Ian <Ian.Warren@crawley.gov.uk>
Subject: #19789 Crawley Borough Local Plan: Duty to Cooperate - National Highways

Dear Diana,

I understand you have been in correspondence with my colleague, Ian Warren, in relation to the

Crawley Local Plan draft Infrastructure Plan. We are currently considering your comments – thank you for sending those through to us.

You will be aware that the Crawley Borough Local Plan 2024-2040 was recently approved at Full Council for its Publication Consultation (Regulation 19) and Submission for Examination. The formal public consultation is scheduled to commence on Tuesday 9 May 2023.

Please find attached the emerging Duty to Cooperate Statement which has been updated to support the Local Plan consultation. I would be grateful if you are able to check through this document and let me know if there are any factual corrections you would like me to make before it is made publicly available. Please do also let me know if it contains anything which is of concern to you.

I will need any comments back by **Friday 28 April 2023** at the latest, to be able to take it into account for the consultation versions.

Any formal detailed comments you have on the document can occur any time until the close of the Regulation 19 consultation, certainly as part of our further conversations and agreements in relation to the transport modelling and the Duty to Cooperate or as your formal representations to the Crawley Borough Local Plan (consultation is due to close on 20 June 2023).

I look forward to hearing from you. Please do not hesitate to contact me for any clarification on the above or attached.

Kind Regards
Elizabeth

Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council

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From: [Caroline West](#)
To: [Brigden, Elizabeth](#); [Warren, Ian](#)
Cc: [Eleanor Harman](#)
Subject: FW: Crawley IDP
Date: 28 April 2023 09:20:51
Attachments: [~WRD3631.jpg](#)
[Education Extract \(Mar 2023\) 20.4.23 further changes \(002\).docx](#)
[Draft DtC Statement \(April 2023\) EH Comments.docx](#)
[Topic Paper 1 Unmet Needs and DtC.pdf](#)

Hi Ian and Elizabeth,

Following your emails last week, here are WSCC's responses below:

Crawley IDP

Our response to Ian's queries are set out in the email below in green below. I have also attached an updated version of the education section of the IDP.

DtC Statement and Unmet Needs Topic Paper

I have attached some text changes and typos that I have picked up. As the main commentary on the ongoing work that is taking place with regard to education provision is in the Topic Paper, I wonder whether it should be more detailed in terms of the work that has taken place to date with regard to identifying a site and that you will continue to work with us and neighbouring authorities to monitor the situation and work together over the provision of secondary places. Although we previously discussed a SoCG, I don't think that this would be necessary now but there is a lot of useful information in the draft SoCG that you prepared a while ago which I think could be incorporated into the DtC.

Please let me know if you have any further queries.

Kind regards

Eleanor

From: Warren, Ian <Ian.Warren@crawley.gov.uk>
Sent: 14 April 2023 09:37
To: Caroline West <Caroline.West@westsussex.gov.uk>; Eloise Witty <Eloise.Witty@westsussex.gov.uk>
Cc: Eleanor Harman <eleanor.harman@westsussex.gov.uk>; Brigden, Elizabeth <Elizabeth.Brigden@crawley.gov.uk>; Lappage, Sallie <Sallie.Lappage@crawley.gov.uk>
Subject: RE: Crawley IDP

****EXTERNAL****

Hi Caroline and Eloise,

We are just in the process of finalising our Infrastructure Plan for our reg 19 consultation,

following your feedback.

There are a couple of points where we are still a bit unclear about the Crawley picture in respect of Education (further to the WSCC comments, attached):

1. Where does the new Serenity School in Three Bridges fit in with regard to the description of current Special Educational Needs provision (under 'Current Provision') and the remaining need for specialist provision (under 'Current Findings')? *The Serenity School is a private school so does not form part of our commentary on publicly funded schools free at the point of access.*
2. The unmet secondary need from Crawley under 'Current Findings' has been amended from to 6-8FE to 4-6FE, but the reference to the need for a 6-8FE secondary school has not been amended. If the second reference is still accurate then presumably this includes approx. 2FE of need arising outside Crawley – is this correct? *Yes. Also, I have removed the reference to Bohunt Horsham as only a handful of places are taken by children from Crawley so not really relevant to secondary provision in the Borough.*
3. Is there any more detail about proposals for meeting the secondary need following the meetings with Horsham / DfE? *No, we are reviewing options at existing Crawley Schools. Bringing forward a site at W of Ifield prior to the Horsham Local Plan seems unlikely/unfeasible.*
Is it possible to be any more specific about the location(s) where the outstanding need for specialist provision (i.e. new special school, Special Support Centres at existing schools, alternative provision college site) will need to be met? Some of this will presumably involve the need for a new site but (as per the previous discussions around the new secondary school) there is no site available for this within the borough. *The text included in the Education extract is still relevant. At this stage, we can't be too specific about the location of these specific sites and it will depend on the availability of a site for such a facility. Geographically all areas within the brough are reasonably accessible in terms of distance.*
4. How does the proposal for a 'Through School' as part of the proposed Crabbet Park allocation in Mid Sussex (2FE at Primary and 4FE at secondary, with or without sixth form, according to the Reg 18 MSDC Plan) relate to the picture of need in Crawley? *It currently does not include provision for Crawley based pupils.*

Any comment you are able to provide on these in the next few days would be most helpful.

Many Thanks

Kind Regards

Yours Sincerely

Ian Warren
Senior Planning Officer
Crawley Borough Council

01293 438644

<http://www.crawley.gov.uk/planning>

From: Eleanor Harman <eleanor.harman@westsussex.gov.uk>

Sent: 29 March 2023 14:17

To: Warren, Ian <ian.Warren@ Crawley.gov.uk>

Cc: Eloise Witty <Eloise.Witty@westsussex.gov.uk>; Caroline West <Caroline.West@westsussex.gov.uk>

Subject: Crawley IDP

Dear Ian,

Thank you for inviting us to comment on the draft Crawley Infrastructure Plan before the Regulation 19 consultation starts in May. We have some minor comments in the main document and have some more substantive changes to the Education section which I have attached in a separate word document. After today, I will be out of the office until 17th April. If you have any queries regarding our comments before then, please contact either Caroline West or Eloise Witty.

Kind regards

Eleanor

Eleanor Harman

Senior Planner (Part Time: Mon, Tues and Weds 9.30-2.30)

Planning Policy and Infrastructure Team, Planning Services

West Sussex County Council, Ground Floor, Northleigh, Chichester, PO19 1RQ

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EDUCATION	
Current Provision	<ul style="list-style-type: none"> • Twenty fivesix primary schools considered to be at around 8790% capacity at year of entry. • SixSeven secondary schools considered to be at 100% capacity at year of entry. • One all-through school considered to be at 26% capacity at primary year of entry and 98% capacity at secondary year of entry • Some primary schools also provide nursery classes and there are a range of pre-schools throughout the town. • Two Special Educational Needs SEND schools considered to be at 100% capacity at year of entry; one new SEND school set to open in early 2023. • One Alternative Provision setting considered to be 100% capacity in all year groups. • Eight Special Support Centres co-located on mainstream school sites, both primary and secondary.
Evidence Base	<ul style="list-style-type: none"> • Draft Duty to Cooperate Statement (Crawley Borough Council, 2021) • North West Sussex Statement of Common Ground (2020) • Infrastructure Funding Statement 2020/21 (Crawley Borough Council, 2021) • Infrastructure Business Plan Outline 2022/23 (Crawley Borough Council, 2022) • Planning School Places (West Sussex County Council, 2022) • SEND Developer Contribution Requirements as a Statutory Education Provider (West Sussex County Council, 2020) • School Effectiveness Strategy 2018-2022 (West Sussex County Council, 2018)
Current Findings	<ul style="list-style-type: none"> • Additional early education places for children aged 3 or 4 are actively being prioritised by supporting new and existing providers in the three neighbourhoods of Maidenbower, Pound Hill and Furnace Green. • New primary schools of up to three forms of entry are being provided in Forge Wood and at Kilnwood Vale (in Horsham District). Forge Wood Primary opened in September 2016 and offers up to 2FE (60 places per year of age) but can be expanded by a further form of entry if required to offer up to 90 places per year of age. Kilnwood Vale Primary opened in September 2019 offering up to 2FE (60 places per year of age) but can be expanded to up to 3FE or 90 places per year of age if required in the future. • In recent years, additional places have been provided at, Northgate, The Mill, Our Lady Queen of Heaven, Gossops Green, Waterfield, and Desmond Anderson Primary Schools. • The creation of an all through primary of the infant and junior schools in Three Bridges has created an additional form of entry.



EH Eleanor Harman ...

If this refers is the SoCG that was drafted in July 2021 wrt secondary provision, I don't think this is needed anymore in light of changes to secondary provision in Crawley.

Reply

	<ul style="list-style-type: none"> • The Gatwick Free School opened in September 2014 with classes in Year R and 7. The school has provision for two forms of entry at primary level and four forms of entry at secondary level. • Secondary schools are at <u>capacity</u> and it is currently estimated that provision will be needed for around 46-68 additional forms of entry at secondary school level in Crawley during the course of the Local Plan. This is on the basis that four forms of entry are being provided by The Gatwick Free School, eight are being provided at Bohunt Horsham and two further forms of entry are being provided <u>permanently</u> by existing schools in the borough. • A site for a 6-8 FE secondary is therefore required going forward <u>to include existing demand within the Borough and any children emanating from the strategic development where a site is likely to be identified.</u> Due to the lack of an identified site in Crawley the Local Plan makes allowance for consideration of education provision on sites allocated for uses including housing. In addition, discussions are taking place with neighbouring authorities to ensure that, in the absence of an available site within Crawley, a strategic site is identified as close to the borough as possible. • Specialist provision for children with Special Educational Needs is required moving forward by providing a combination of a new special school, Special Support Centres at mainstream schools, and an alternative provision college site for children who are excluded from mainstream education. There is a particular shortfall in provision for children with Social, Emotional and Mental Health needs (SEMH) and for children with Autism. • The precise level of need generated by new development over the Local Plan period, and any excess need over and above that met by the interventions identified above, will depend on the mix and tenure of the dwellings delivered. WSCC will continue to assess predicted pupil numbers and discussions will continue with WSCC over the provision of additional primary and secondary places in the borough. • <u>Recent immigration schemes</u> have <u>created localised demand for additional places particularly around hotels housing refugees.</u> • Youth, Adult Education and Further Education facilities may be required as the Crawley population increases although these elements of education are not led by WSCC.
Future Studies and Plans	<ul style="list-style-type: none"> • Annual updates to Planning School Places. • Further discussions and investigations to identify how additional capacity is to be provided.
Phasing	<ul style="list-style-type: none"> • The conditions and agreements for the development of the new neighbourhoods that form part of Crawley set out requirements for the timing of the <u>expansion of the provision</u> of new primary schools <u>recently built.</u>
Funding	<ul style="list-style-type: none"> • Financial contributions have been secured from the developers of the two new neighbourhoods that will form part of Crawley <u>through s106 agreements</u> towards the provision of additional secondary school places within the town.

	<ul style="list-style-type: none"> • The provision of schools and additional school places will form part of the calculation of the Community Infrastructure Levy. • West Sussex County Council receives basic need grant annually where there is a shortfall in places across the County and some of this can be applied to Crawley Secondary Schools amongst other projects. • Additional funding sources maywill need to be considered.
Summary	<ul style="list-style-type: none"> • Additional provision at secondary school level is required to cater for anticipated levels of growth. • Additional forms of entry and temporary bulge classes are being provided at existing secondary schools. • Refugee resettlement programmes can create localised demand at short notice. • The establishment of Gatwick Free School in Manor Royal at primary and secondary level will be taken into account in assessing the number of additional places that need to be provided. • Further discussions are taking place with WSCC to develop the proposals for providing for additional school capacity, including the impact of any provision of secondary places in the North of Horsham. • Further discussions are required regarding the approach to meeting additional requirements for Special Educational Needs provision.



Unmet Needs and Duty to Cooperate

- Page 6 (Education Section) - Change reference to 6-8FE unmet housing need to 4-6FE during the local plan period.
- Para 3.3.1 – update to refer to 4-6FE forms of entry.
- Para. 3.3.1 – Add reference to the two further forms of entry being provided permanently by existing schools in the borough.
- Para. 3.3.3. – Update to 4-6FE.
- Conclusion – update reference to education unmet needs.

Duty to Cooperate Statement (April 2023)

- Para 2.2.1 – Typo – says West Sussex District Council
- Para. 3.5.10 – reference to the JMLP should read Joint Minerals Local Plan (July 2018) Partial Review (March 2021).

From: [Eleanor Harman](#)
To: [Warren, Ian](#)
Subject: RE: Infrastructure Plan - Education
Attachments: [Final WSCC response General Comments \(June 2023\).docx](#)

Hi Ian,

We have reviewed the changes and they look fine and reflect the SoCG. We included some minor changes to the Infrastructure Plan in our Reg 19 response which I have attached for your information.

Please let me know if you have any queries.

Kind regards

Eleanor

From: Warren, Ian <Ian.Warren@crawley.gov.uk>
Sent: 14 July 2023 15:27
To: Eleanor Harman <eleanor.harman@westsussex.gov.uk>
Cc: Brigden, Elizabeth <Elizabeth.Brigden@crawley.gov.uk>; Lappage, Sallie <Sallie.Lappage@crawley.gov.uk>; Caroline West <Caroline.West@westsussex.gov.uk>
Subject: FW: Infrastructure Plan - Education

****EXTERNAL****

Hi Eleanor,

Following the meeting last week about options for additional secondary school provision in Crawley I have drafted some changes to the Infrastructure Plan section on Education. The attached document has a clean version together with screenshots further down showing the same with tracked changes as compared with the previous draft switched on (I couldn't see another way of pasting the text while keeping the track changes).

The update tries to bring it more into line with the new Statement of Common Ground and to soften the emphasis on the new school solution while keeping it as an option being actively explored. It does not go into the specifics re potential expansions at existing schools as I appreciate this is still unconfirmed.

Since this is really a reworking of the text in light of the SoCG and the uncertainties re solutions, it hopefully doesn't raise any problems for you, and I am aware there are not currently standing objections from WSCC re this part of the IP. You are welcome though to flag any concerns. We are hoping to submit the amended IP with the plan at the end of the month.

We haven't forgotten the issues with the Transport element of the IP and will be in touch separately about that.

Kind Regards

EDUCATION

Current Provision	<ul style="list-style-type: none"> • Twenty five primary schools considered to be at around 87% capacity at year of entry. • Six secondary schools considered to be at 100% capacity at year of entry. • One all-through school considered to be at 26% capacity at primary year of entry and 98% capacity at secondary year of entry • Some primary schools also provide nursery classes and there are a range of pre-schools throughout the town. • Two Special Educational Needs schools considered to be at 100% capacity. • One Alternative Provision setting considered to be 100% capacity in all year groups. • Eight Special Support Centres co-located on mainstream school sites, both primary and secondary.
Evidence Base	<ul style="list-style-type: none"> • Draft Duty to Cooperate Statement (Crawley Borough Council, 2023) • North West Sussex Statement of Common Ground (2023) • Infrastructure Funding Statement 2020/21 (Crawley Borough Council, 2021) • Infrastructure Business Plan Outline 2022/23 (Crawley Borough Council, 2022) • Planning School Places (West Sussex County Council, 2022) • SEND Developer Contribution Requirements as a Statutory Education Provider (West Sussex County Council, 2020) • School Effectiveness Strategy 2018-2022 (West Sussex County Council, 2018)
Current Findings	<ul style="list-style-type: none"> • Additional early education places for children aged 3 or 4 are actively being prioritised by supporting new and existing providers in the three neighbourhoods of Maidenbower, Pound Hill and Furnace Green. • Secondary schools are at capacity and it is currently estimated that provision will be needed for around 4 additional forms of entry at secondary school level in Crawley during the course of the Local Plan. This is on the basis that four forms of entry are being provided by The Gatwick Free School, and two further forms of entry are being provided permanently by existing schools in the borough. • Provision for at least 4FE is therefore required going forward to include existing demand within the Borough. Due to the lack of an identified site for a new secondary school in Crawley the potential to provide additional secondary school places, to serve Crawley's needs, will also be considered on sites close to Crawley in neighbouring authorities, and discussions are taking place with neighbouring authorities. If new strategic development on Crawley's boundaries could provide this opportunity, the DfE will seek to bring forward a school

	<p>as early as possible. In that case a 6-8 FE secondary would be required to include any additional children emanating from the strategic development where a site is likely to be identified. In the meantime, WSCC will look to a combination of permanent and temporary expansions to cater for additional places. The Local Plan also makes allowance for consideration of education provision on sites allocated for uses including housing.</p> <ul style="list-style-type: none"> • Specialist provision for children with Special Educational Needs is required moving forward by providing a combination of a new special school, Special Support Centres at mainstream schools, and an alternative provision college site for children who are excluded from mainstream education. There is a particular shortfall in provision for children with Social, Emotional and Mental Health needs (SEMH) and for children with Autism. • The precise level of need generated by new development over the Local Plan period, and any excess need over and above that met by the interventions identified above, will depend on the mix and tenure of the dwellings delivered. WSCC will continue to assess predicted pupil numbers and discussions will continue with WSCC over the provision of additional primary and secondary places in the borough. • Recent immigration schemes have created localised demand for additional places particularly around hotels housing refugees. • Youth, Adult Education and Further Education facilities may be required as the Crawley population increases although these elements of education are not led by WSCC.
Future Studies and Plans	<ul style="list-style-type: none"> • Annual updates to Planning School Places. • Further discussions and investigations to identify how additional capacity is to be provided.
Phasing	<ul style="list-style-type: none"> • The conditions and agreements for the development of the new neighbourhoods that form part of Crawley set out requirements for the timing of the expansion of the of new primary schools recently built.
Funding	<ul style="list-style-type: none"> • Financial contributions have been secured from the developers of the two new neighbourhoods that will form part of Crawley through s106 agreements towards the provision of additional secondary school places within the town. • The provision of schools and additional school places will form part of the calculation of the Community Infrastructure Levy. • West Sussex County Council received basic need grant annually where there is a shortfall in places across the County and some of this can be applied to Crawley Secondary Schools amongst other projects. • Additional funding sources may need to be considered.
Summary	<ul style="list-style-type: none"> • Additional provision at secondary school level is required to cater for anticipated levels of growth.

- | | |
|--|--|
| | <ul style="list-style-type: none">• Additional forms of entry and temporary bulge classes are being provided at existing secondary schools.• Refugee resettlement programmes can create localised demand at short notice.• Further discussions are required regarding the approach to meeting additional requirements for Special Educational Needs provision. |
|--|--|

EDUCATION

Current Provision	<ul style="list-style-type: none"> • <u>Twenty five</u> primary schools considered to be at around 87% capacity at year of entry. • Six secondary schools considered to be at 100% capacity at year of entry. • One all-through school considered to be at 26% capacity at primary year of entry and 98% capacity at secondary year of entry • Some primary schools also provide nursery classes and there are a range of pre-schools throughout the town. • Two Special Educational Needs schools considered to be at 100% capacity. • One Alternative Provision setting considered to be 100% capacity in all year groups. • Eight Special Support Centres co-located on mainstream school sites, both primary and secondary.
Evidence Base	<ul style="list-style-type: none"> • Draft Duty to Cooperate Statement (Crawley Borough Council, 2023) • <u>North West Sussex</u> Statement of Common Ground (20230) • Infrastructure Funding Statement 2020/21 (Crawley Borough Council, 2021) • Infrastructure Business Plan Outline 2022/23 (Crawley Borough Council, 2022) • Planning School Places (West Sussex County Council, 2022) • SEND Developer Contribution Requirements as a Statutory Education Provider (West Sussex County Council, 2020) • School Effectiveness Strategy 2018-2022 (West Sussex County Council, 2018)

<p>Current Findings</p>	<ul style="list-style-type: none"> • Additional early education places for children aged 3 or 4 are actively being prioritised by supporting new and existing providers in the three neighbourhoods of Maidenbower, Pound Hill and Furnace Green. • Secondary schools are at <u>capacity</u> and it is currently estimated that provision will be needed for around 4-6 additional forms of entry at secondary school level in Crawley during the course of the Local Plan. This is on the basis that four forms of entry are being provided by The Gatwick Free School, and two further forms of entry are being provided permanently by existing schools in the borough. • <u>Provision for at least 4FE is therefore required going forward to include existing demand within the Borough. Due to the lack of an identified site for a new secondary school in Crawley the potential to provide additional secondary school places, to serve Crawley's needs, will also be considered on sites close to Crawley in neighbouring authorities, and discussions are taking place with neighbouring authorities. If new strategic</u>
	<p><u>development on Crawley's boundaries could provide this opportunity, the DfE will seek to bring forward a school as early as possible. In that case a 6-8 FE secondary would be required to include any additional children emanating from the strategic development where a site is likely to be identified. In the meantime, WSCC will look to a combination of permanent and temporary expansions to cater for additional places. A site for a 6-8 FE secondary is therefore required going forward to include existing demand within the Borough and any children emanating from the strategic development where a site is likely to be identified. Due to the lack of an identified site in Crawley</u>†The Local Plan <u>also</u> makes allowance for consideration of education provision on sites allocated for uses including housing. In addition, discussions are taking place with neighbouring authorities to ensure that, in the absence of an available site within Crawley, a strategic site is identified as close to the borough as possible.</p> <ul style="list-style-type: none"> • Specialist provision for children with Special Educational Needs is required moving forward by providing a combination of a new special school, Special Support Centres at mainstream schools, and an alternative provision college site for children who are excluded from mainstream education. There is a particular shortfall in provision for children with Social, Emotional and Mental Health needs (SEMH) and for children with Autism. • The precise level of need generated by new development over the Local Plan period, and any excess need over and above that met by the interventions identified above, will depend on the mix and tenure of the dwellings delivered. WSCC will continue to assess predicted pupil numbers and discussions will continue with WSCC over the provision of additional primary and secondary places in the borough. • Recent immigration schemes have created localised demand for additional places particularly around hotels housing refugees. • Youth, Adult Education and Further Education facilities may be required as the Crawley population increases although these elements of education are not led by WSCC.

Future Studies and Plans	<ul style="list-style-type: none"> • Annual updates to Planning School Places. • Further discussions and investigations to identify how additional capacity is to be provided.
Phasing	<ul style="list-style-type: none"> • The conditions and agreements for the development of the new neighbourhoods that form part of Crawley set out requirements for the timing of the expansion of the of new primary schools recently built.
Funding	<ul style="list-style-type: none"> • Financial contributions have been secured from the developers of the two new neighbourhoods that will form part of Crawley through s106 agreements towards the provision of additional secondary school places within the town. • The provision of schools and additional school places will form part of the calculation of the Community Infrastructure Levy. • West Sussex County Council received basic need grant annually where there is a shortfall in places across the County and some of this can be applied to Crawley Secondary Schools amongst other projects. • Additional funding sources may need to be considered.
Summary	<ul style="list-style-type: none"> • Additional provision at secondary school level is required to cater for anticipated levels of growth. • Additional forms of entry and temporary bulge classes are being provided at existing secondary schools. • Refugee resettlement programmes can create localised demand at short notice. • Further discussions are required regarding the approach to meeting additional requirements for Special Educational Needs provision.

From: [Eric Signi](#)
To: [Brigden, Elizabeth](#); [Caroline West](#); [Eleanor Harman](#); [Guy Parfect](#)
Cc: [Eloise Witty](#); [Warren, Ian](#); [Lappage, Sallie](#)
Subject: RE: Crawley Borough Local Plan: Duty to Cooperate - West Sussex County Council
Date: 28 April 2023 12:00:06

Hi Elizabeth,

I trust you are well.

I just wished to come back to you on behalf of Guy and myself, with regards to your email below and our comments on the DTC documents you forwarded a couple of weeks ago. Having now been through these, we could not find anything that would call for concerns or comments. These documents are all from 2020 and as such are out of phase with the current position on transport studies such as in Mid Sussex, where it still refers more to their now adopted site allocations DPD than the current emerging Plan; however, the timetable for updating SoCG was discussed at NWS Duty to Cooperate meeting yesterday with yourself and our colleagues Caroline and Tracey.

I trust that is helpful.

Best regards

Eric

Eric Signi

Senior Transport Planner

Transport Planning & Policy Team, Planning Services

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Email: eric.signi@westsussex.gov.uk | www.westsussex.gov.uk

From: Brigden, Elizabeth <Elizabeth.Brigden@crawley.gov.uk>

Sent: 14 April 2023 10:44

To: Caroline West <Caroline.West@westsussex.gov.uk>; Eleanor Harman <eleanor.harman@westsussex.gov.uk>; Guy Parfect <guy.parfect@westsussex.gov.uk>

Cc: Eloise Witty <Eloise.Witty@westsussex.gov.uk>; Eric Signi <Eric.Signi@westsussex.gov.uk>; Warren, Ian <Ian.Warren@crawley.gov.uk>; Lappage, Sallie <Sallie.Lappage@crawley.gov.uk>

Subject: Crawley Borough Local Plan: Duty to Cooperate - West Sussex County Council

****EXTERNAL****

Dear Caroline/Eleanor/Guy,

You will be aware that the Crawley Borough Local Plan 2024-2040 was recently approved at Full

Council for its Publication Consultation (Regulation 19) and Submission for Examination. The formal public consultation is scheduled to commence on Tuesday 9 May 2023.

Please find attached the emerging Duty to Cooperate Statement which has been updated to support the Local Plan consultation. I would be grateful if you are able to check through this document and let me know if there are any factual corrections you would like me to make before it is made publicly available. Please do also let me know if it contains anything which is of concern to you. For your information, I have also attached a draft Unmet Needs Topic Paper, which will also be published to support the Local Plan consultation. Similarly, please do let me know if you have any comments or changes you need me to make.

For both of these documents, I will need any comments back by **Friday 28 April 2023** at the latest, to be able to take it into account for the consultation versions.

Any formal detailed comments you have on the above mentioned documents, can occur any time until the close of the Regulation 19 consultation, either for a further conversation/agreement as part of the Duty to Cooperate or as your formal representations (consultation is due to close on 20 June 2023).

I have also attached our current signed SoCG with WSCC, as well as the most recent, signed NWS SoCG. Please let me know if you can think of any matters which would be helpful to prepare a bilateral SoCG between our two authorities for, ahead of the submission of the Crawley Borough Local Plan.

I am also aware of your separate correspondence with Ian Warren in relation to the draft Crawley Infrastructure Plan – I am happy if any conversations for these are combined, if that is easiest.

I look forward to hearing from you. Please do not hesitate to contact me for any clarification on the above or attached.

Kind Regards
Elizabeth

Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council

www.crawley.gov.uk/planning

