

NORTHERN WEST SUSSEX AUTHORITIES

POSITION STATEMENT (revised July 2014)

1. Purpose of this Position Statement

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

2. Background

- 2.1 Crawley Borough Council, Horsham District Council and Mid Sussex District Council (the Northern West Sussex Authorities) have a long history of working together on issues of mutual importance and across a wide range of services. For example, the councils have mature shared service arrangements and routinely work together on procurement of goods and services. The three authorities share planning and administrative boundaries. There is a particularly strong history of joint working and collaboration on planning policy matters.
- 2.2 Over the years a number of planning studies have been procured jointly and, when

To meet regularly at Member and officer level to review the situation and respond to new issues and changing circumstances.

3.2 It has been agreed between the three authorities that:

A joint Local Plan does not need to be produced; (although a local joint area action plan exists);

Joint policies would not be appropriate;

Each authority will determine its own employment and housing targets but in so doing will consider them in the context of the key strategic issues and the particular circumstances of the other authorities; and,

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will seek to collectively promote sustainable economic growth across the wider economic areas of the Gatwick Diamond and the LEP.

- 5.3 Ongoing work has continued to ensure that the authorities are informed and can plan for and promote the economy of the area taking into account the recent national recession and emerging legislation. The Northern West Sussex Authorities commissioned a new study in 2013 taking into account changes affecting planning for economic growth at a national level. The Economic Growth Assessment was finalised and published in April 2014. The Economic Growth Assessment provides an overview of the economic future of the Northern West Sussex economic area as well as necessary, specific information for each of the three authorities with information on the local economy and its potential for growth to contribute to the development of Local Plans and corporate economic development policies. Building on existing initiatives and policies, the three Local Plans, with a positive approach to sustainable economic growth will assist delivery of the ambitions of the LSS and the LEP Economic Plan.

Outcomes

- 5.4 *Crawley* – The emerging Local Plan focuses on the sub-regional employment function of Crawley as part of the Gatwick Diamond. It encourages sustainable economic growth by directing employment uses to Crawley’s existing main employment areas? Which are, whilst taking a more managed approach to largest employment area - Manor Royal as the priority employment location for B-class uses. It is recognised within the Local Plan that a significant demand for employment floorspace, coupled with a limited supply of land available for economic development use, means that it may be necessary to assess opportunities for new economic development locations(s) at Crawley over the Plan period, potentially at a strategic site.
- 5.5 *Horsham* - The Horsham District Planning Framework recognises the wider context of the Gatwick Diamond, the role of Horsham town as the primary location and focus for employment in the District which is complemented by the surrounding rural hinterland with its vibrant rural economy. It builds upon the established transport connections and the niche market offer within the District. It supports growth in employment land and communications to provide a diverse, resilient and flexible range of business premises which will provide good quality jobs and the opportunity of living close to where people work. A new significant amount of new floorspace is planned within a high value business park in a new strategic allocation north of and adjoining Horsham town. It also seeks to protect and enhance existing employment floorspace throughout the hierarchy of settlements as well as promoting starter units and move on accommodation to nurture and support growth of smaller businesses and attract inward investment.
- 5.6 *Mid Sussex* - Sustainable economic growth and a jobs target (3% growth from the Employment Land Review requiring the provision of 380 jobs per annum) was set out in the Mid Sussex District Plan submitted July 2013. This Plan sought to support sustainable communities and a robust local economy by encouraging opportunities for residents to work within their towns and villages. It included provision and promotion of new employment land to meet its needs without impinging upon its neighbours. This Plan has subsequently been withdrawn, and a Regulation 18 consultation on the new draft District Plan is anticipated in Autumn 2014.

6. Housing Need

Aim

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

Action Taken to Date

- 6.2 Within the Gatwick Diamond, the Local Strategic Statement indicates that the local authorities will seek to secure sufficient housing and infrastructure to meet the needs of those who live or work in the area, including the needs arising from the Gatwick Diamond economy. Crawley, Horsham and Mid Sussex have continued to work with the other Gatwick Diamond authorities as Local Plans are being prepared. In accordance with the National Planning Policy Framework, the local authorities have a clear understanding of and are planning for the housing needs their area.
- 6.3 A joint understanding of the constraints of the housing market area is also needed. Each authority has particular issues which can impact the delivery of housing whilst seeking to meet objectively assessed needs and to support the economy. The three authorities have set out the key constraints which are set out below.
- 6.4 Horsham and Mid Sussex share some environmental designations such as the High Weald Area of Outstanding Natural Beauty and oEMC /P <n -20(k)-16

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6.8 Crawley is the most constrained of the three authorities in terms of space in which to develop within the planning authority boundary

dwellings per annum would be required to meet baseline demographic needs across the Northern West Sussex Authorities. This is the need that arises naturally from increasing birth rates, decreasing death rates and historic levels of net migration.

- 6.13 Table 1 also details the total proposed provision of 326 dwellings per annum (dpa) for Crawley and 650 dpa for Horsham. Whilst Mid Sussex does not currently have a proposed provision figure, the figure in the previously submitted District Plan was 530 dpa. This would result in a total provision figure of 1,506 dpa for the Housing Market Area. Whilst this currently represents a shortfall in meeting the objectively assessed need in the Housing Market Area, the figures show an improved position from that at September 2013, reflecting that all three authorities are doing all they can to maximise capacity for housing development within their boundaries and thereby reduce the shortfall across the Housing Market Area.

Table 1 – Objectively Assessed Housing Needs and proposed housing provision –

development in the light of this shortfall. They each consider that they are doing the maximum reasonable to meet the objectively assessed housing needs of the area as a whole, taking into account local constraints, and the need for sustainable development.

6.17 The three authorities will also work with

cover any additional development beyond that was proposed in the Mid Sussex District Plan submitted in July 2013 (since withdrawn).

- 7.4 An assessment of the transport requirements for strategic locations at Crawley was undertaken in the 'At Crawley Study'. This identified that significant investment would be needed in highway infrastructure including the need for a western relief road around Crawley in the event of significant further development west of Crawley. Agree with comment 11
- 7.5 Each authority has undertaken individual Transport Studies, using shared methodology and overseen by WSCC, as part of their evidence base. Horsham and Crawley have worked together over production of a joint evidence base for the Joint Area Action Plan and Mid Sussex and Crawley have liaised with each other to make sure that cross-boundary transport impacts are understood in relation to potential development sites close to the boundaries of the two authorities. Issues focus on the A264/A22 corridors which severely constrain development at East Grinstead and in Mid Sussex close to the boundary with Crawley, as well as the M23/A23 constrained junctions which impact on any potential development on the boundary between the

- 8.2 Those matters that the Northern West Sussex Authorities have specifically agreed to exclude from this Statement are:
- a. Gatwick Airport and additional airport capacity will be covered primarily through joint working with the Gatwick Diamond Local Authorities and Gatwick Joint Local Authorities grouping;
 - b. Flood risk is a particular concern to Crawley Borough Council, but it does not have a similar impact on the other two authorities, (joint working has previously existed between the Environment Agency, Crawley Borough Council, Mid Sussex District Council, Mole Valley District Council and Reigate and Banstead Borough, Surrey County Council and Tandridge District Council in relation to the Upper River Mole catchment).
 - c. Alongside an agreement across the Gatwick Diamond, the local authorities will share information about the needs of the gypsy and travelling show people communities, and each authority will work towards accommodating the needs of the permanent Traveller population that have been identified within its own area. A Transit site has been granted planning permission in Chichester to serve the whole of the West Sussex County following a study, commissioned in July 2013 (by Mid Sussex on behalf of the West Sussex authorities), looking at the issue of unauthorised encampments;
 - d. The Gatwick Diamond Local Authorities have agreed to maintain a coordinated approach to the review of Town Centres and their roles and the Northern West Sussex Authorities will continue joint work within that framework. The potential growth of Crawley Town Centre has been accepted through the Gatwick Diamond Local Strategic Statement, but it is also accepted that the character and supporting roles of other town centres needs to be recognised with some regeneration to perform vital roles for their community; and,
 - e. The low carbon economy is to be dealt by the individual authorities working either on their own or, as appropriate, with others. They will maintain an awareness of

APPENDIX A Localism Act 2011 – Duty to Co-operate

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

- (a) the area of—
 - (i) a district council (including a metropolitan district council),
 - (ii) a London borough council, or
 - (iii) a county council in England for an area for which there is no district council,but only so far as that area is neither in a National Park nor in the Broads,
- (b) a National Park,
- (c) the Broads,
- (d) the English inshore region, or
- (e) the English offshore region, and

“two-tier area” means an area—

- (a) for which there is a county council and a district council, but
- (b) which is not in a National Park.

(6) The engagement required of a person by subsection (2)(a) includes, in particular,

APPENDIX B National Planning Policy Framework extract – Duty to Co-operate

Planning strategically across local boundaries

159. Local planning authorities should have a clear understanding of housing needs in their area. They should:

prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment

should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);³⁴ and
- caters for housing demand and the scale of housing supply necessary to meet this demand;

of engagement from initial thinking through to implementation, resulting in a final position