



## Horsham / Crawley Statement of Common Ground

### Horsham District Local Plan 2023-2040

### Crawley Borough Local Plan 2023-2040

#### Signatories:

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 <p>Dated: 27/06/24</p>	 <p>Dated: 12/07/24</p>

#### Statement

##### 1. Introduction and Scope

- 1.1 The purpose of this statement is to document the strategic cross-boundary matters between Horsham District Council and Crawley Borough Council (the parties) that have been or are being addressed jointly by the parties, as necessary to demonstrate effective joint working, or to draw out areas of common ground that are specific or unique to the parties.
- 1.2 It also draws out areas of disagreement, and identifies what measures are being taken to address these.
- 1.3 The matters dealt with in this statement are:
- Section 2: Local Plan periods and governance
  - Section 3: Housing need
  - Section 4: Gypsy and Traveller Accommodation
  - Section 5: Employment – strategy and sites
  - Section 6: Settlement hierarchy
  - Section 7: Strategic growth West of Crawley
  - Section 8: Gatwick Airport
  - Section 9: Education
  - Section 10: Water neutrality

This statement was originally signed by the parties' respective Cabinet Members for Planning and published on 25 July 2023 ahead of the Submission of the Crawley Borough Local Plan Review and to support the Horsham District Local Plan. The statement has been reviewed and updated ahead of the Submission of the Horsham District Local Plan 2023-2040.

## 2. Local Plan periods and governance

2.1 Figure 1 below indicates anticipated Local Plan timescales and periods at the time of the latest review. Note that timescales are subject to change to take reasonable account of circumstances.

Figure 1: Overview of Local Plan timescales

	<b>Crawley Borough Local Plan Review (2024 – 2040) Timetable</b>	<b>Horsham District Local Plan Review Timetable (to be advised)</b>
Overview & Scrutiny Commission	31 January 2023	n/a
Cabinet	1 February 2023	11 December 2023
Full Council: Approval of Publication & submission	22 February 2023	11 December 2023
Statutory public consultation period: Publication (Pre-submission) consultation	9 May to 20 June 2023	19 February to 01 March 2024
Submission	31 July 2023	June 2024
Examination hearings	November 2023 – January 2024	Autumn/Winter 2024/25
Adoption	Summer/Autumn 2024	Spring/Summer 2025

2.2 The parties have a strong track record of constructive joint working with effective outcomes. This includes the direct delivery of a new neighbourhood immediately adjacent to Crawley within Horsham District's administrative area (Kilnwood Vale), which is now being built out, following the preparation and adoption of the West of Bewbush Joint Area Action Plan Development Plan Document 2009 (JAAP DPD). The authorities work effectively together across the Northern West Sussex Housing Market Area and has and have secured continual updates of the Northern West Sussex Statement of Common Ground (CBC, HDC, Mid Sussex District Council and West Sussex County Council) and the Northern West Sussex Housing Market Area Housing Need Statement of Common Ground (CBC, HDC, MSDC)<sup>1</sup>. This achieved meeting in full the housing need for the Housing Market Area in the existing round of adopted Local Plans. The Northern West Sussex Statement of Common Ground is in the process of being updated, along with a separate Housing-specific related Statement of Common Ground agreed between the three district/borough authorities.

2.3 Work on specific strategic matters critical to the two parties also includes detailed discussions at Member and Officer Level on key cross-boundary matters including how to address unmet housing

<sup>1</sup> Both Statements of Common Ground are available at: <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>

need and consideration of the potential for strategic scale development. This includes Homes England's proposals for a new neighbourhood located in Horsham District to the west of Ifield, Crawley and the possible provision in the longer term of new railway stations between Crawley and Horsham on the Arun Valley Line. Appendix B provides the details of the most relevant strategic planning and cross boundary meetings held between the two authorities since the adoption of the 2015 Crawley and Horsham Local Plans.

- 2.4 Other work includes jointly commissioning numerous evidence documents (the most recent of these are set out in Appendix A) to ensure a common understanding of the wider sub regional position and to ensure these issues can be taken account of during our plan making. Other discussions include those concerning the Gatwick Diamond Authorities<sup>2</sup> and has also included the West Sussex and Greater Brighton Strategic Planning Board.

### 3. Housing need

- 3.1 Through the signed Statement of Common Ground for the Northern West Sussex Authorities and the Northern West Sussex Housing Market Area Housing Need Statement of Common Ground (both July 2023), the authorities party to these SoCGs agreed that housing need is a relevant strategic matter and in particular agreed that it was critical that they continued to work positively together to seek to address the housing needs of the Housing Market Area (HMA). Up until 2020, i.e. over the first 5 years of the Crawley and Horsham adopted plans, the full housing need for the Northern West Sussex HMA was being met and indeed exceeded by the three district and borough authorities combined.
- 3.2 Figure 2 establishes the future local housing need (calculated using the current standard method formula) identified for the Northern West Sussex Housing Market Area as progressing through the Local Plan Reviews. It is recognised that the standard method requires updating until the point of Local Plan submission as updated household growth projections and affordability data are released. As the Local Housing Need figure changes annually, Figure 2 is a snapshot and therefore illustrative. In accordance with national planning practice guidance, the Standard Method is fixed at the point of Submission. For Crawley, this means that the Standard Method local housing need calculation is based on the data published in March 2023 (as this was the correct information when the Crawley Borough Local Plan was submitted for Examination in July 2023).
- 3.3 Housing need within Crawley has as of March 2024 been calculated through the Standard Method as totalling 739 dwellings per annum (dpa). However, the base Standard Method figure for evidence underpinning the Crawley Borough Local Plan at the point of the Plan's submission in July 2023 was 755 dpa (the figure in March 2023). In accordance with national guidance, this is the appropriate figure for Crawley to be used in Figure 2. Over the Crawley Borough Local Plan period (2023 – 2040) this equates to 12,835 dwellings. Due to the land constraints associated with the borough, the draft Crawley Local Plan Review proposes a total supply-led figure for the whole Plan period of 5,330 dwellings, leaving an outstanding unmet need of 7,505 dwellings over the same period. This is not anticipated to come forward as a flat trajectory, and therefore the draft Crawley Borough Local Plan sets a stepped housing requirement figure rather than as a simple annualised average. In light of

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<sup>2</sup> Gatwick Diamond LSS: <https://crawley.gov.uk/sites/default/files/documents/PUB344429.pdf>

this unmet need, Crawley Borough Council wrote to Horsham District Council in January 2020 and in April 2023 to request whether it is able to assist in contributing to these unmet needs.

Figure 2: Overview of future need and supply

LPA	Local Housing Need*	Local Plan target	Plan status	Plan period
<b>Crawley</b>	755 dpa (March 2023)	386 dpa (yrs 1-5) 386 dpa (yrs 6-10) 210 dpa (yrs 11-17)	Main modifications (post-hearings)	2023-2040
<b>Horsham</b>	917 dpa (March 2024)	480 dpa (yrs 1-5) 901 dpa (yrs 6-10) 901 dpa (yrs 11-17)	Pre-submission	2023 -2040
<b>Mid Sussex District**</b>	1,039 dpa (March 2024)	1,145 (yrs 1-18)	Pre-submission	2021-2039
<b>Annual Deficit</b>	-	700 (2023-28) 279 (2029-34) 455 (2035-39)	-	-

\*The Standard Method for calculating Local Housing Need has been used. CBC is based on based on the Standard Methodology Figure 2014-based Household Projections, calculated March 2023. HDC and MSDC is based on based on the Standard Methodology Figure 2014-based Household Projections, calculated March 2024.

\*\*Figures shown by permission of Mid Sussex District Council

- 3.4 As of March 2024, annual housing need within Horsham has been calculated through the Standard Method as totalling 917 dwellings per annum (dpa). Along with existing commitments, made Neighbourhood Plan allocations and an allowance for windfall development, HDC has sought to meet as much of this need as possible by allocating sites in its forthcoming Local Plan.
- 3.5 Since the receipt of the initial request as to whether HDC could accommodate any of Crawley's unmet needs, matters relating to the Habitats Regulations and impact of water supply abstraction on protected Habitats arose. This created a significant delay in the progression of the Local Plans and also the ability to grant permission for new developments across both authority areas. Despite the delays to the Local Plans, discussions and evidence base updates have continued to be undertaken to establish the extent to which Crawley can deliver housing within its own boundaries. In addition, Horsham District Council has prepared a range of evidence base documents to support the preparation of its own plan, to examine the extent to which it could accommodate housing needs.
- 3.6 The Northern West Sussex authorities agree<sup>3</sup> that, subject to meeting individual housing needs and establishing that there is potential to assist other authorities with unmet need, assistance will be prioritised as follows:

- Priority 1: Northern West Sussex HMA
- Priority 2: Coastal West Sussex HMA

<sup>3</sup> Northern West Sussex Housing Needs Statement of Common Ground (July 2023)

- Priority 3: Other adjacent and nearby HMAs where it is justified by each individual authority.

- 3.7 Whilst HDC is currently unable to meet its full housing need due to the water abstraction and habitats issue outlined in paragraph 3.5, it can confirm that the prioritisation identified in the NWS HMA Position Statement will be used should it in future years be able to meet unmet needs of other authorities, such as CBC.
- 3.8 The parties agree the above approach forms the most effective and positive approach to the consideration of meeting unmet needs within the shared primary housing market area, taking into account local constraints, the need to resolve environmental and infrastructure constraints, and the need for sustainable development.

*Affordable Housing:*

- 3.9 The Strategic Housing Market Assessment highlighted an affordable housing need emerging from Crawley of a total of 739 dwellings per year. Even if the council could secure 40% affordable housing for all residential developments across the whole borough, due to the supply constrained housing requirement position, this would only meet 17% of the overall affordable housing needs of the borough (126dpa). This leaves a substantial amount of unmet affordable housing need (606dpa).
- 3.10 However, critically, viability evidence being prepared to support the draft Crawley Borough Local Plan highlighted the challenges in securing 40% for high density schemes in Crawley town centre (due to high existing land values and high costs for high rise development), leading to a reduction in the levels of affordable housing which can be required through such private market led schemes. The Submission Crawley Borough Local Plan sets a 25% affordable housing requirement from such schemes within the town centre location. This reduces the amount of the affordable housing need being met within the borough to 15% (108dpa) when taking known schemes into account (i.e. not counting windfalls, of which the highest number are anticipated to come forward within the town centre).
- 3.11 The most recent available evidence (Social Rented Housing and First Homes Study, September 2022) has shown a need for 492 affordable homes per year in Horsham. The emerging HDLP seeks to set an appropriately ambitious target of 45% affordable housing on non-strategic greenfield sites, 40% on the Land West of Ifield strategic site, 35% on other strategic sites and bespoke targets for other typologies, whilst ensuring development is viable. This target is however anticipated to yield well below the identified need for Horsham District.
- 3.12 The parties agree to consider and maximise opportunities to address affordable housing needs and appropriate housing mix as evidenced through the joint SHMA and any subsequent updates, subject to viability, particularly, but not restricted to, where development may take place adjacent to Crawley. Whilst the full need cannot be met through planning policies and Section 106 Agreements (as outlined above), both authorities are proactively seeking to maximise supply in other ways, for example through Horsham District Housing (HDC's affordable housebuilding company), Crawley Borough Council's own housing delivery schemes, and facilitating schemes led by housing associations.

### *Self- and Custom-Build:*

- 3.13 Due to Crawley's predominantly urban nature, with a high proportion of higher density residential schemes proposed, and the limited area of land outside the existing Built-Up Area Boundary, with the exception of the land affected by aircraft noise constraints, there are limited opportunities for self-build to take place within the borough's administrative boundaries. The current number of individuals and groups on the council's Self- and Custom-Build Register is 160; of which 121 are Part 1 entries (i.e. those which satisfy local eligibility criteria) and a further 39 are Part 2 entries.
- 3.14 The HDLP includes a policy requirement for self-build or custom-build plots to be provided as part of residential developments in accordance with the latest demand on the Self and Custom build register. The number this is likely to yield is uncertain given the fluctuating nature of the register.
- 3.15 The parties acknowledge that those with a desire to self-build in the area will be able to register with the relevant authority subject to local eligibility criteria. The parties therefore agree that the outcomes of emerging policies will be monitored and policies reviewed in future if appropriate.

## **4. Gypsy and Traveller Accommodation**

- 4.1 The parties agree that taking into account the allocation of 69 new (net) pitches in the HDLP, there is an assessed shortfall of 58 Gypsy and Traveller pitches in Horsham during the Horsham District Local Plan period. The level of need has risen sharply during the Plan's preparation to take account of Government guidance on assessing need. In Crawley borough, there is no immediate need for a new publicly owned pitch site. However, the Crawley Borough Local Plan acknowledges that it is inherently improbable that within the next 15-year period there will be no new households formed from within the borough requiring additional site provision. On this basis, a reserve site for up to 10 pitches is allocated at Broadfield Kennels, southwest of the A264, in the adopted and emerging Crawley Borough Local Plan in anticipation of a future need being identified within the borough.
- 4.2 In November 2023, HDC formally requested assistance from CBC in meeting its identified shortfall. CBC confirm that, due to its highly constrained land supply and the need to prioritise its own needs on the only site available within the borough's administrative boundaries, it is unable to offer such assistance.

## **5. Employment Growth**

- 5.1 The joint Economic Growth Assessment confirms that the Northern West Sussex (NWS) area operates as a broad functional economic market area, with the spatial extent largely consistent with the authority boundaries of Crawley, Horsham and Mid Sussex. Each of the three local authority areas is characterised by its own set of economic strengths and challenges. In particular:
- Crawley represents the dominant commercial centre in NWS and drives demand for employment space, attracting most activity and commands highest rents.
  - By comparison, Horsham tends to operate as secondary property market, but which is nevertheless accommodating new business development and continues to attract demand from a range of occupiers.

- There is some interaction and competition between different centres in the NWS area for occupiers and investment. Forthcoming developments of a strategic nature offer potential for more competition in future although they are planned for different uses.
- The stock of industrial space has been increasing across each NWS authority area in recent years. At the same time, the stock of traditional industrial jobs (typically occupying [former] B1c/B2 space) has been declining, although logistics and distribution related jobs (typically occupying B8 space) have increased in both Crawley and Horsham.
- Changes to permitted development rights have resulted in the removal of a sizeable quantum of office space from the market, whilst the stock of office jobs has increased. A key recent feature of the market is a reported mismatch between demand for high quality 'Grade A' new office space and available supply which rarely meets this specification.

5.2 Figure 3 shows the comparable needs of the two authorities as established by the EGA and the focused updates:

Figure 3: Use Class Needs for Crawley and Horsham 2019 - 2036 (EGA 2020)

	1. Baseline Job Growth	2. Past Development Rates	3. Baseline Labour Supply	4. Alternative Housing Delivery (Med)	4. Alternative Housing Delivery (High)
Crawley All B Uses (OE, Q2 2018) (January 2020)	+6,970sqm floorspace -1.1ha land	+130,900sqm floorspace +33.0ha land	(752dpa) +432,910sqm floorspace +113.0ha land		
Horsham All B Uses (January 2020)	+40,730sqm floorspace 8.3ha land	+140,590sqm floorspace 39.0ha land	(965dpa) 143,375sqm floorspace 35.3ha land	(1,200dpa) 206,840sqm floorspace 51.0ha land	(1,400dpa) 260,855sqm floorspace 64.3ha land
Crawley All B Uses Experian Q2 2018 (Focused Review September 2020)	+154,680sqm 38.7ha land	+159,290sqm 39.6ha land	As Jan 2020 EGA	(347dpa) 92,835sqm floorspace 21.7ha land	(597dpa) 243,480sqm floorspace 56.9ha land
Horsham All B Uses (Focused Review November 2020)	+13,300sqm 0ha land	+179,240sqm 45.1ha land	(920dpa) +166,990 37.5ha land	(1,200dpa) +240,910 54.0ha land	(1,400dpa) +303,820 68.1ha land
Crawley All B Uses Experian Q4 2022 (Focused Review January 2023) – covers period 2023 to 2040	+113,390sqm 26.2ha land	136,510qm 32.0ha land	As Jan 2020 EGA	(314dpa) 113,351sqm 26.1ha land	(544dpa) 299,362sqm 69.0ha land

#### Labour Supply:

5.3 The level of additional employment supply required above the Standard Methodology figure has been tested for housing growth in Horsham District of 1,200dpa; and High – 1,400dpa. These higher scenarios would include an element of Crawley's unmet housing needs (i.e. some of the Standard Method 750dpa figure for Crawley borough not able to be accommodated within the borough's administrative boundaries). The emerging HDLP identifies a level of employment growth commensurate with the overall housing target that can be accommodated during the Plan period. It also takes account of any existing employment commitments.



5.4 For Crawley, assessing the full Standard Method housing delivery figure of 752dpa, as assessed at the time of the EGA, provided an unrealistic impression of the actual labour supply associated with the Local Plan, as Crawley is unable to meet its housing need in full. Therefore, for the Crawley Focused EGA Updates in 2020 and 2023, two alternative housing delivery figures were tested: the borough constrained supply led figure of 347dpa in 2020 (updated to 314dpa in 2023)); and a higher 597dpa in 2020 (updated to 544dpa in 2023) which included the potential for growth immediately adjacent to Crawley, at the West of Ifield, but within Horsham district. For both EGAs, this latter scenario was not progressed further as it was acknowledged that such an urban extension would not meet solely Crawley's housing needs and would also meet those from the adjoining district. Therefore, it is anticipated that, although some employment needs arising from an urban extension may need to be met in Crawley, remaining employment need arising from the development may be accommodated within the urban extension itself, or if necessary, elsewhere within neighbouring districts. The draft HDLP site allocation for West of Ifield seeks provision of around 2 hectares of employment floorspace for a range of employment uses.

*Local Plan Employment Strategies:*

5.5 On the basis of Crawley's focused EGA update, the Crawley Borough Local Plan Review identifies a need for a minimum of 26.2 hectares new business land in the borough, based on Experian Baseline Job Growth projections. This is anticipated to be met in full within the borough, through opportunities within the existing Main Employment Areas and the allocation of a new Strategic Employment Location at Gatwick Green, to provide at least 17.93 hectares of new industrial land (principally within the B8 storage & distribution sector). No Main Modifications against the principle of this strategic allocation were required by the Crawley Borough Local Plan Examination Inspectors' post-hearing letter (31 January 2024).

5.6 Horsham District Local Plan will ensure a sufficient supply and choice in employment floorspace across the District, both within the urban and rural areas. The approach set out in the HDLP is to seek to retain Key Employment Areas to enable the redevelopment, regeneration, intensification and smart-growth of existing sites, and allocate 4 new sites for employment-led development. Larger site allocations are to provide a total of 6.5 hectares of additional new employment land to ensure opportunities for employment and for people to live and work locally. It is anticipated that these sources of supply will exceed the assessed level of need in the District, to allow current business premises to grow and expand, or to move into premises that meet modern business demands, and to help provide a wide choice of local jobs that help ensure that the loss of business and commuting rates outside the District are not exacerbated.

5.7 The parties agree that the approaches to employment growth in the respective emerging Horsham District Local Plan and Crawley Borough Local Plan Review are appropriate, and reflect the recent joint evidence base contained in the Economic Growth Assessment (EGA), the Crawley EGA focused updates September 2020 and January 2023, and the Northern West Sussex EGA Focused Update for Horsham (Nov 2020). The EGA outlines that CBC will need to consider the extent to which additional employment land can be brought forward within Crawley Borough's boundary, but also notes the potential for unmet employment need to be accommodated elsewhere in the wider NWS FEMA should this not be possible.



5.8 The parties also agree that the approaches taken to employment growth in the respective emerging Horsham District Local Plan and Crawley Borough Local Plan will provide a complementary role in ensuring economic growth is maximised and a variety of opportunities are provided within the NWS Functional Economic Area for existing businesses, business growth, business start-up and labour supply.

## **6. Settlement hierarchy**

6.1 Both parties agree that Crawley is a higher order settlement providing significant employment opportunity and a retail centre for the sub-region, and Horsham Town is a primary economic and cultural centre serving both Horsham town and the wider District. It is also agreed that a number of smaller settlements within Horsham District play a further important role as service centres and employment hubs serving more local needs. The parties agree that Crawley, Horsham Town and the smaller settlements will continue to be promoted as complementary to one another, in respect of their employment, retail and services functions.

## **7. Homes England's Proposals for Strategic growth West of Crawley**

7.1 A strategic growth area to the immediate West of Crawley (WoC) is being promoted by Homes England through the Horsham District Local Plan review process and is proposed for allocation in the HDLP (Regulation 19). The site is near-contiguous with the administrative and urban boundaries of Crawley. The proposals for this site are made by Homes England, who own a significant area of land to the west of Ifield. The site allocation proposed is for a strategic-scale neighbourhood development of around 3,000 homes. These proposals also include provision of employment, retail, open space for informal public use and formal recreation, schools, and other complementary uses. Homes England have promoted a further area of land which sweeps in a broad arc around the western edge of Crawley, from Faygate in the south west to Gatwick in the north east as having longer term potential for up to 10,000 homes. However, at this stage, the longer term housing needs of Crawley, Horsham and the wider sub-region are unknown, and at the time of writing there remain significant uncertainties regarding both water neutrality and the outcome of the DCO proposals to expand Gatwick. The deliverability of a 10,000 home scheme site in the period beyond 2040 cannot be demonstrated at this time.

7.2 The parties recognise that CBC submitted an in-principle objection to the WoC proposal as part of HDC's Regulation 18 consultation and that CBC's current formal position as reflected in their representation to the Regulation 19 HDLP is that it strongly opposes Homes England's proposals, including their "West of Ifield" proposals. The parties agree that, notwithstanding the CBC objection, should the site allocation be accepted by the Local Plan Inspector and confirmed, then the Councils would continue to work together to address the variety of needs which would arise from within Crawley Borough as part of any development in this location, together with wider consideration of unmet needs as set out in the Northwest Sussex Statement of Common Ground. This would include consideration of affordable housing requirements and education needs.

7.3 Given potential cross-boundary impacts, the parties agree that, notwithstanding CBC's in principle objections to the allocation of the West of Ifield site in the HDLP and CBC's representations requesting changes to the policy, the following key objectives are broadly reflected in site allocation

Strategic Policy HA2: Land West of Ifield, and will be pursued in discussions with the site promoter, should Policy HA2 be adopted as part of the HDLP:

- a) Any future development shall be Local Plan-led to comply with all the applicable policies set out in the Horsham District Local Plan and also for compliance with the Crawley Borough Local Plan to be an important and significant material consideration.
- b) Any development must be landscape/townscape-led, in particular ensuring the settlement gap between development 'at Crawley' and Horsham Town is maintained and enhanced by securing defensible boundaries, ensuring any negative impacts on the setting of Crawley are mitigated through thoughtful and careful layout and design of the scheme, and visual, physical and sustainable connectivity is maintained and enhanced, whilst upholding the "net zero" aspirations of both authorities through the development from Crawley's neighbourhoods to the countryside beyond.
- c) Development must be a comprehensive design and strategically planned to ensure all the infrastructure needs for the whole proposed development "West of Crawley" are met and either delivered from its commencement or with delivery targets set out in a legal agreement. The site promoter must submit comprehensive masterplans ahead of the submission of any Planning Application to Horsham District Council
- d) Development as a whole, and all phases within it, should demonstrate excellence with respect to maximum energy efficiency, decarbonisation and sustainability, water use efficiency (and achieve water neutrality), substantial active and sustainable transport, high quality urban design and effective use of land, green infrastructure connectivity and biodiversity net gain. The development proposals should clearly evidence a high priority commitment to achieving net zero carbon emissions.
- e) The housing mix in terms of dwelling type, size and tenure must meet the agreed need of the local communities, based on the joint Strategic Housing Market Assessment, appropriate for an "At Crawley" location. In particular, the Affordable Housing provision must meet those needs considered to be most acute and appropriate for a strategic development in this location, taking account of needs identified by CBC. The councils will seek to reach formal agreement in relation to shared nomination rights for the affordable housing provision.
- f) The parties will work together, with the Highways authority to ensure that any masterplan prepared by the site promoter secures an effective transport strategy to serve the development. This will deliver a multi-modal sustainable transport route that delivers significant active travel options and mitigates adverse impacts of traffic flow into Crawley. The new route must not be an obstacle to the delivery of a comprehensive new corridor link to the west of Crawley, that would connect the A264 near to Faygate to the A23 north of County Oak.

Both HDC and CBC will continue to work jointly to seek a clear commitment from Homes England or other appropriate government bodies to the full delivery of the sustainable transport corridor link to support the scale of development proposed in any allocation. To support such a commitment this will include any necessary indicative identification of land within respective Local Plans, and consideration of funding models including developer contributions. The parties are engaging with WSCC and Gatwick Airport regarding the boundaries of airport safeguarding

for a potential future southern runway, especially in the vicinity of the multi-modal sustainable transport corridor link along the southern boundary of safeguarding for the airport.

- g) Provide for educational needs arising within the development, and additionally make suitable provision or allowance for meeting educational needs in the wider area, in particular Crawley's secondary education needs insofar as they cannot be met within the constrained borough of Crawley. Education provision meeting Crawley's needs would be subject to delivery by the Department for Education, securing sufficient alternative funding, and/or appropriate developer contributions or sufficient volumes of CIL being available from growth within Crawley Borough.
- h) Provide appropriate and sufficient access to healthcare provision, ideally on-site, to address all healthcare needs arising from new development in order to ensure no additional pressure on existing provision in both Horsham District and Crawley Borough. Any scheme should be designed to maximise healthy lifestyles and meet agreed levels of open space and sports facilities; located, designed and laid out appropriately for strategic neighbourhood scale developments and reflecting the 'at Crawley' blended needs.
- i) Open space, sports and recreation facilities to be provided in accordance with an agreed approach to standards and a clear understanding of the level of additional need required to be met, taking into account the existing socio-economic demographic information for Horsham and Crawley, along with quantity, quality and accessibility of existing provision.

#### Outstanding Matters for Further Investigation and Discussion

7.4 It is acknowledged that this is a significant proposal and there are further matters yet to be finalised and supported by evidence. In view of the cross-boundary nature of this proposal, it is important, notwithstanding CBC's in principle objection to the site allocation, that any development scheme satisfies both authorities, with a requirement for the site promoter to engage effectively with both LPAs ahead of any future planning application. The councils agree to continue to work together and maintain the considered and cooperative approach taken to date in order to resolve these issues. In particular this relates to housing needs, the delivery upfront of all the required infrastructure, including the multi-modal sustainable transport corridor link and mitigating the environmental impacts.

## **8. Gatwick Airport**

8.1 HDC and CBC work closely with each other, Gatwick Airport Ltd (GAL) and other affected local authorities through a number of working groups focusing on airport-related matters which are structured at various levels, focused around the following groups. These groups meet on a regular basis to: discuss and reach consensus on airport-related matters; co-operate in monitoring and assessment tasks; and lobby for change as a combined group with greater weight than as individual authorities:

- Gatwick Airport Consultative Committee (GATCOM) - Statutory consultative body for Gatwick Airport
- Gatwick Joint Local Authorities Group (GJLA) - Group of all local authorities neighbouring the airport
- Gatwick Officers Group (GOG) - Officer group supporting GJLA and GATCOM

→ Noise and Track Monitoring Advisory Group (NATMAG) - Group monitoring airport-related noise and flight path tracking.

8.2 Both parties agree that they will maintain engagement with these groups thereby achieving effective joint working. The parties also agree that, in light of the draft Aviation Strategy, “Aviation 2050; The Future of UK Aviation”, the safeguarding of land for a potential new southern runway at Gatwick will continue to be upheld in their respective emerging Local Plans, with the Crawley Local Plan amending the boundary of safeguarded land within Crawley borough to exclude land allocated for the Gatwick Green strategic employment site. The overall continuation of safeguarded land for a new southern runway will be reviewed in the future should changes to national policy on aviation allow for this.

8.3 The appropriate noise contours for decision-making are the Gatwick Master Plan 2019 Additional Runway Summer Day 2040 contours (Plan 31) until such time as these are superseded by subsequent noise contours that are published by Gatwick Airport and approved by the CAA.

8.4 Both parties agree that it is appropriate for both local plans to include policies that seek to prevent the provision of additional or replacement airport-related parking outside of the Airport Boundary.

8.5 Both parties agree to continue to work collaboratively with the other Gatwick Authorities with regard to Gatwick Airport’s Northern Runway Development Consent Order proposals and to co-operate in preparing responses to those proposals overseen by a Gatwick Steering Group of senior officers.

## **9. Education provision**

9.1 Subject to the requirements of WSCC and the Department for Education, it is agreed by the parties that Crawley Borough has an unmet need for secondary school places of 4 – 6 forms of entry which, due to a lack of suitable sites, cannot be met within the Borough boundaries. As such, notwithstanding the in-principle CBC objection to Policy HA2 it is agreed that provision is made by the emerging HDLP in Strategic Policy HA2: Land West of Ifield for a new secondary school. This would provide sufficient new secondary school provision to meet the needs of the new development as well as any existing unmet needs arising from Crawley and potential future needs in the area.

## **10. Water Neutrality**

10.1 Horsham District falls entirely within the Sussex North Water Supply Zone (SNWSZ), and the majority of Crawley Borough also falls within this zone. In September 2021, Natural England (NE) issued a Position Statement. This explains that it cannot be concluded that the existing water abstraction, at Pulborough, within the SNWSZ is not having an impact on the Arun Valley Special Area of Conservation (SAC) and Ramsar site. It advises that development within this zone must not add to this impact. This prevented local plans from progressing to later formal stages of preparation until such a time when a Water Neutrality Strategy could be agreed. The Strategy must ensure no further increase in water abstraction at Pulborough as a result of further development.

10.2 A Water Neutrality Study was undertaken by consultants commissioned on behalf of the parties, together with the other affected local authority (Chichester District Council), supported by key partner agencies (including Natural England, Environment Agency, Southern Water) and authorities (West Sussex County Council, South Downs National Park Authority and Mid Sussex District Council).

Part C: the Water Neutrality Strategy, agreed by the Chief Executives of the Local Planning Authorities and endorsed by Natural England, was published in November 2022.

10.3 The parties have prepared a joint Local Plan water neutrality policy setting out significantly tighter water efficiency measures for new development and requiring offsetting of any remaining projected net increases in water use. The parties agree that, together with the other key affected local authority (Chichester District Council), and key partner agencies, they will produce a Sussex North Offsetting Water Scheme (SNOWS) which meets legal and soundness tests. They further agree to work together to implement actions required by the Strategy, which may include cross-boundary offsetting measures including retrofitting of existing buildings, aiming to achieve water neutrality across the SNWSZ. The parties are part of a working group, supported by a dedicated full-time Water Neutrality Officer, which is working hard to achieve this.

10.4 Both authorities are parties to an agreed separate Statement of Common Ground on Water Neutrality which sets out further details regarding the cooperation and joint work to resolve this strategic issue.

## 11. Closing matters and further work

11.1 The parties to this statement have demonstrated that they have worked jointly and constructively on cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.

11.2 In summary, specific joint work includes:

- Regular joint review of housing delivery to identify early any supply related cross-boundary issues (**outcomes:** joint SHMA; updates to SoCG; agreement on approach to meeting unmet housing needs);
- Proactive participation in the West Sussex and Greater Brighton partnerships (or directly with the relevant member authorities) and Gatwick Diamond Local Authorities (**outcome:** wider sub-regional coordinated strategy to meeting development needs);
- Proactive and frequent co-operation and co-ordination within the Northern West Sussex group of authorities (Crawley, Horsham, Mid Sussex and West Sussex County Council) (**outcomes:** signed and continually updated NW Sussex SoCG and NW Sussex HMA Housing Need SoCG, joint evidence base updates following on from published joint studies);
- Co-ordination of educational provision to be addressed on a cross-boundary basis and, notwithstanding CBC's in principle objection to the site allocation, as part of the West of Ifield strategic development in Horsham district (**outcome:** potential delivery of a new secondary school to help meet existing unmet needs, in particular from Crawley, and development needs in any West of Ifield strategic development);
- Notwithstanding CBC's in principle objection, a joint approach to considering policy development and implementation of the West of Ifield strategic site, in light of the proposed allocation in the HDLP and of the future submission by the site promoter of relevant planning applications, this approach to include:

- Advocating and seeking to agree a landscape/townscape-led masterplan, working with Homes England to ensure: i) appropriate provision and upfront phasing of all infrastructure, phased to ensure its delivery in advance of occupancy relating to the development phase; ii) an appropriate housing mix including an agreed joint strategy for affordable housing; iii) delivery of genuine and demonstrable biodiversity net gain; and iv) a sustainable transport strategy and delivery plan.
  - Working together to ensure that any new development does not become an obstacle to the future provision of a possible new western link road, that would provide a multi-modal transport corridor link equipped with sustainable transport infrastructure for a net zero carbon future.
  - **outcome:** that the site promoter brings forward an effective transport strategy for approval by both authorities to serve any new development together with potential delivery of a full multi-modal transport link that serves current and any strategic scale allocation in the Horsham District Local Plan and secures appropriate developer contributions (commensurate to the scale of the development) to contribute to its provision, alongside delivery of any future additional strategic development to the west of Crawley.
- Continued close cooperation on ongoing strategic cross-boundary issues and supporting technical work including transport & highways, economic growth, employment land, water management and infrastructure, Gatwick Airport, biodiversity net gain, net zero, landscape and green/blue infrastructure (**outcomes:** complementary transport studies and updates; presumption for joint studies on cross-boundary matters, etc.).



**Appendix A: Joint Documents**

<b>Document</b>	<b>Joint Authorities</b>	<b>Study Scope</b>
West of Bewbush Joint Area Action Plan (July 2009) Crawley Borough Council and Horsham District Council	Crawley and Horsham	Adopted Area Action Plan Development Plan Document for strategic neighbourhood development adjacent to Crawley within Horsham District.
Northern West Sussex Strategic Housing Market Area (November 2019) Icenl	Crawley and Horsham	Housing Market & Housing Needs
Economic Growth Assessment (January 2020) Lichfields	Crawley, Mid Sussex and Horsham	Employment Land requirement
Eco-Serv GIS Report (2019)	Crawley and Horsham	Green Infrastructure Ecological Services
Gatwick Water Cycle Study (2020)	Crawley, Mid Sussex, Horsham, Reigate and Banstead	Water resources
Strategic Flood Risk Assessment (2020)	Crawley and Horsham	Flooding
Water Neutrality Study Part B: In Combination Assessment	Chichester, Crawley and Horsham	Water resources
Water Neutrality Study Part C: Water Neutrality Strategy	Chichester, Crawley and Horsham	Water resources
Water Neutrality Topic Paper	Chichester, Crawley and Horsham	Water resources

**Appendix B: HDC/CBC Strategic Planning Meetings Jan 2016 – May 2024**

Strategic Groups (HDC/CBC)	2016	2017	2018	2019	2020	2021	2022	2023	2024
<p>NWS Planning Policy Officers</p> <p>Key Outputs:</p> <ul style="list-style-type: none"> <li>• Shared understanding of cross boundary issues</li> <li>• SoCG signed (2016)</li> <li>• SoCG signed (2020)</li> </ul>	<ul style="list-style-type: none"> <li>• March 2016 (Signed and Published Updated NWS Position Statement)</li> <li>• 25 August (Wastewater Infrastructure: NWS Authorities/Thames Water)</li> </ul>	<ul style="list-style-type: none"> <li>• 5 July</li> <li>• 25 July</li> <li>• 26 July</li> <li>• 22 August</li> <li>• 13 Dec</li> </ul>	<ul style="list-style-type: none"> <li>• 12 July</li> <li>• 6 Nov (Wastewater Infrastructure: NWS Authorities/Thames Water)</li> <li>• 6 Nov (Economic and Housing Evidence)</li> <li>• 14 Nov</li> </ul>	<ul style="list-style-type: none"> <li>• 21 Oct</li> <li>• 19 Dec</li> </ul>	<ul style="list-style-type: none"> <li>• 2 June (Signed and Published NWS SoCG)</li> </ul>	<ul style="list-style-type: none"> <li>• 26 Jan</li> <li>• 17 May</li> <li>• 12 July</li> </ul>	<ul style="list-style-type: none"> <li>• 17 Feb</li> <li>• 31 March</li> <li>• 16 May</li> <li>• 26 May</li> <li>• 7 July</li> <li>• 21 July</li> <li>• 15 Sept</li> <li>• 10 Nov</li> </ul>	<ul style="list-style-type: none"> <li>• 5 Jan</li> <li>• 13 Feb</li> <li>• 9 March</li> <li>• 27 April</li> <li>• 29 June</li> <li>• 17 August</li> <li>• 12 October</li> <li>• 7 December</li> </ul>	<ul style="list-style-type: none"> <li>• 1 February</li> <li>• 28 March</li> </ul>
<p>Crawley/Horsham Policy Meeting</p> <p>Key Output:</p> <ul style="list-style-type: none"> <li>• Statement of Common Ground (June 2023)</li> </ul>				<ul style="list-style-type: none"> <li>• 20 March</li> <li>• 27 Sept (DtC &amp; NWS)</li> </ul>	<ul style="list-style-type: none"> <li>• 5 May</li> <li>• 20 May</li> <li>• 28 May</li> <li>• 2 Sept</li> <li>• 24 Sept</li> <li>• 15 Oct</li> <li>• 12 Nov</li> <li>• 26 Nov</li> <li>• 1 Dec</li> <li>• 17 Dec</li> </ul>	<ul style="list-style-type: none"> <li>• 7 Jan</li> <li>• 25 Jan</li> <li>• 28 Jan</li> <li>• 18 Feb</li> <li>• 18 March</li> <li>• 8 April</li> <li>• 12 April</li> <li>• 22 April</li> <li>• 13 May</li> <li>• 20 May</li> <li>• 3 June</li> <li>• 5 August</li> </ul>	<ul style="list-style-type: none"> <li>• 13 Jan</li> <li>• 10 Feb</li> <li>• 31 March</li> <li>• 28 April</li> <li>• 18 May</li> <li>• 7 July</li> <li>• 1 Sept</li> <li>• 29 Sept</li> <li>• 20 Oct</li> <li>• 14 Nov</li> </ul>	<ul style="list-style-type: none"> <li>• 2 Feb</li> <li>• 16 March</li> <li>• 6 April</li> <li>• 27 April</li> <li>• 18 May</li> <li>• 5 June</li> <li>• 8 June</li> <li>• 13 June</li> <li>• 29 June</li> <li>• 31 August</li> <li>• 21 September</li> </ul>	<ul style="list-style-type: none"> <li>• 25 January</li> <li>• 15 February</li> <li>• 7 March</li> <li>• 28 March</li> <li>• 18 April</li> </ul>

Strategic Groups (HDC/CBC)	2016	2017	2018	2019	2020	2021	2022	2023	2024
						<ul style="list-style-type: none"> <li>• 26 August</li> <li>• 16 Sept</li> <li>• 7 Oct</li> <li>• 4 Nov</li> <li>• 2 Dec</li> </ul>		21 Sept (Planning Portfolio Holder meeting) <ul style="list-style-type: none"> <li>• 30 November</li> </ul>	
Potential New Railway Stations between Crawley and Horsham (Arun Valley Line) Key Output: <ul style="list-style-type: none"> <li>• Draft Network Rail Timetable Study</li> <li>• Draft WSP Timetable Study</li> </ul>			<ul style="list-style-type: none"> <li>• 23 April</li> <li>• 25 May</li> <li>• 5 June</li> <li>• 19 June</li> <li>• 16 July</li> <li>• 31 July</li> <li>• 9 August</li> </ul>	<ul style="list-style-type: none"> <li>• 10 May</li> <li>• 14 Oct</li> </ul>	<ul style="list-style-type: none"> <li>• 4 Feb</li> <li>• 7 Sept</li> <li>• 14 Oct</li> </ul>				
Economic Growth Assessment Key Output:			<ul style="list-style-type: none"> <li>• 26 Feb (Strategic Employment Reigate and Banstead)</li> </ul>	<ul style="list-style-type: none"> <li>• 24 Jan</li> <li>• Feb (commissioned study)</li> <li>• 7 March</li> </ul>	<ul style="list-style-type: none"> <li>• 27 Jan (completed and Published document)</li> </ul>				

Strategic Groups (HDC/CBC)	2016	2017	2018	2019	2020	2021	2022	2023	2024
<ul style="list-style-type: none"> <li>Published Joint Economic Growth Assessment for Crawley, Horsham and Mid Sussex</li> <li>Local Plan policies</li> </ul>			Borough; Horsham District; Mid Sussex District; West Sussex County; and Crawley Borough Councils)	(Inception Meeting) <ul style="list-style-type: none"> <li>9 May</li> <li>22 May</li> <li>24 Sept</li> </ul>					
Strategic Housing Market Assessment Key Output: <ul style="list-style-type: none"> <li>Published joint Strategic Housing Market Assessment for the Northern West Sussex Housing Market Area and updating data for</li> </ul>	<ul style="list-style-type: none"> <li>30 August (Starter Homes and Market Inception Meeting)</li> <li>14 Oct (Interim Meeting)</li> <li>7 Dec (Published Evidence Documents)</li> </ul>			<ul style="list-style-type: none"> <li>5 Feb (commissioned study)</li> <li>1 March (Inception Meeting)</li> <li>25 July</li> <li>29 Nov (completed and published document)</li> </ul>					

Strategic Groups (HDC/CBC)	2016	2017	2018	2019	2020	2021	2022	2023	2024
Crawley and Horsham • Local Plan policies									
Water Neutrality Study Key Output: • Published joint Part B: In Combination Assessment • Published joint Part C: Water Neutrality Strategy • Local Plan joint Policy Appointment of Joint Water Neutrality Project Manager post					<ul style="list-style-type: none"> <li>• 21 Dec (commissioned Water Neutrality Study)</li> </ul>	<ul style="list-style-type: none"> <li>• July (Water Neutrality Study Part A (Crawley and Chichester) and Water Neutrality Technical Note (Horsham) documents published)</li> </ul>	<ul style="list-style-type: none"> <li>• 5 April (agreed Governance Structure and Terms of Reference)</li> <li>• April (published Part B)</li> <li>• 6 Nov (Joint PINs Advisory Meeting held)</li> <li>• 27 Oct (Part C agreed by LPA Chief Execs)</li> <li>• 24 Nov (Part C endorsed by Natural England)</li> <li>• Dec</li> </ul>	<ul style="list-style-type: none"> <li>• Jan (Joint Water Neutrality Project Manager employed)</li> <li>• 14 March (officer attendance at HoL Built Environment Committee)</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

Strategic Groups (HDC/CBC)	2016	2017	2018	2019	2020	2021	2022	2023	2024
							(published Part C)		

The full details of the governance structure and meetings involved in resolving the water supply issues can be provided on request/are set out in the SoCG/Joint Topic Paper/CBC's DTC Statement.

Other meetings that have been attended by both HDC and CBC include:

- Homes England Strategic Site Planning Performance Agreement joint discussions (Homes England, HDC, WSCC, CBC)
- Gatwick Diamond Local Authorities Member Meetings
- Gatwick Diamond Local Authorities Planning Officer Group
- West Sussex and Greater Brighton Strategic Board (Members)
- West Sussex and Greater Brighton Planning Officer Group
- West Sussex Planning Policy Officer Group
- Gatwick Joint Local Authorities (Members)
- Gatwick Airport: Gatwick Officers Group
- Gatwick Airport: GATCOM (Members)
- Gatwick Airport Transport Forum Steering Group
- Gatwick Parking Survey Officers Meeting