

Northern West Sussex Statement of Common Ground: July 2024

1. List of Parties Involved

- Crawley Borough Council
- Horsham District Council
- Mid Sussex District Council
- West Sussex County Council

2. Signatories



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Head of Economy and Planning
Crawley Borough Council



Barbara Childs
Director of Place, Horsham District Council
Horsham District Council



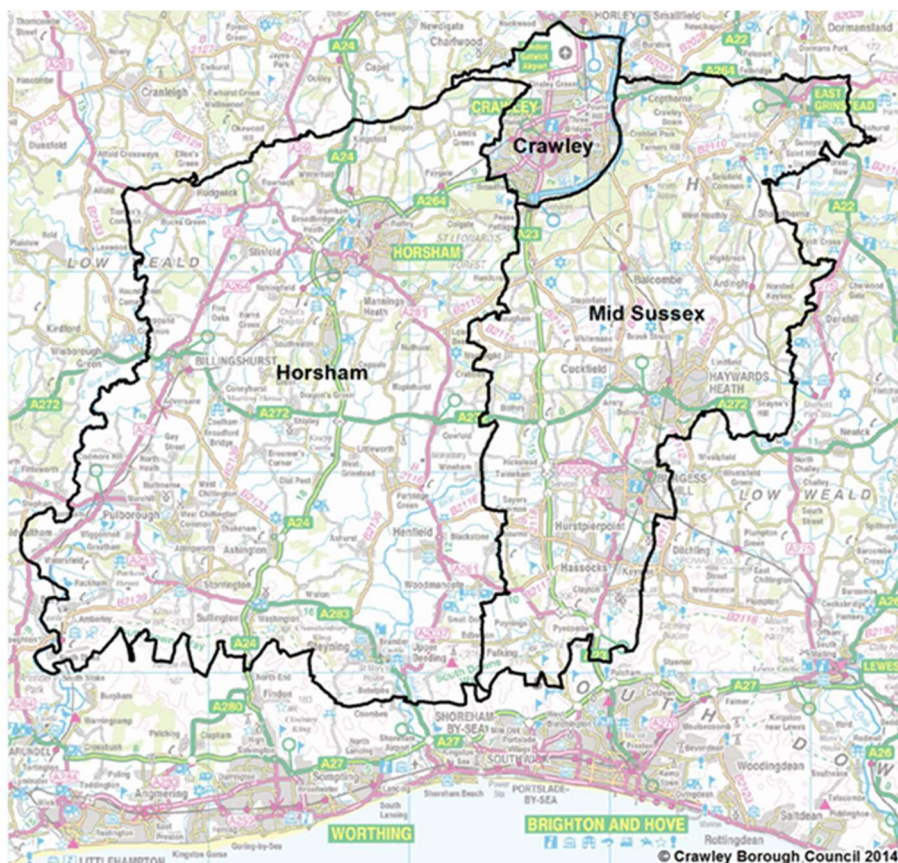
Ann Biggs
Assistant Director – Planning and Sustainable Economy
Mid Sussex District Council



Michael Elkington
Head of Planning Services
West Sussex County Council

3. Strategic Geography

Crawley, Horsham and Mid Sussex are located within the county of West Sussex. Studies undertaken since 2009 have consistently confirmed the three district/borough authority areas form a close Housing Market Area (Northern West Sussex “NWS”) and are part of wider Economic Functional Areas (Gatwick Diamond centred on Crawley/Gatwick Airport, and to the south of the districts: Greater Brighton). The NWS authorities form part of the former ‘Coast to Capital’ Local Enterprise Partnership, which stretched from Chichester in the south west, along the coast to Brighton and Newhaven and Seaford through Mid Sussex and Crawley to Croydon on the outskirts of London.



Crawley Borough Council, Horsham District Council, Mid Sussex District Council (the Northern West Sussex Authorities) and West Sussex County Council 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 borough/district authorities share planning and administrative boundaries. There is a particularly strong history of joint working and collaboration on planning policy matters. Over the years a number of planning studies have been procured jointly and, when previous proposals at Crawley involved development beyond the borough boundary, a joint area action plan between Horsham and Crawley was produced and jointly adopted in 2009.

With the introduction of the Localism Act and the Duty to Cooperate, joint working continued and strengthened with the authorities collaborating together on a number of strategic issues. The Northern West Sussex Authorities’ Position Statement was originally prepared by Mid Sussex, Horsham and Crawley councils in September 2013, and subsequently revised to support each of the authorities’ Local

Plans at examination (July 2014¹, February and March 2015² and March 2016³). Each successfully secured adopted Local Plans⁴ which were found to meet the Duty to Cooperate.

The authorities also work with partners in the wider 'Gatwick Diamond'⁵ area to address strategic planning issues. The aim of this work is to promote the continued prosperity of the Gatwick Diamond and plan for its future growth. As part of this wider area, the authorities have worked on and signed up to the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement⁶, which was reviewed and updated in 2016.

The Northern West Sussex Authorities positively engage with the West Sussex Coastal Authorities and additionally Brighton and Hove and Lewes, in a number of ways (at Member and Chief Executive officer level) and are members of the West Sussex and Greater Brighton grouping⁷ as well as the Greater Brighton Economic Partnership.

Crawley Borough Council and West Sussex County Council are signatories to a S106 Agreement with Gatwick Airport, in which Mid Sussex and Horsham District Councils are named as Adjoining Authorities. Officers and Members from the authorities meet regularly to discuss issues related to the operation, growth and development of the airport including its master plan, air quality issues, on and off airport parking and surface access. The authorities are also working collaboratively with regard to the Airport's current Development Consent Order (DCO) application. Effective outcomes of this joint working include:

- success at planning appeals across boundaries; and
- securing financial contributions and ongoing funding for noise and air quality monitoring and supporting major schemes like Gatwick station improvements and smaller improvements to public transport services.

Whilst recognising that housing markets are not totally discrete, the authorities of CBC, HDC and MSDC continue to work jointly and collaboratively to plan for this distinct Housing Market Area. This follows clear statements set out in each of the three adopted Local Plan Planning Inspectors' decisions who recognised the merit in understanding and aiming to meet the needs of the Housing Market Area as a first step in strategic planning for this part of the country which experiences high demand on land for new development. On this basis, the authorities have built upon this evidence in the preparation of their respective Local Plan reviews, whilst acknowledging the differing timescales and priorities of each authority. However, there is an acknowledgement of the overlaps with the adjoining Housing Market Areas and these have been considered in the context of the Local Strategic Statements (for the Gatwick Diamond and West Sussex and Greater Brighton).

¹ Horsham District Planning Framework Examination

² Crawley Borough Local Plan Examination

³ Mid Sussex District Plan Examination

⁴ Horsham District Planning Framework (November 2015); Crawley Borough Local Plan (December 2015); Mid Sussex District Plan (March 2018)

⁵ Crawley Borough Council, Epsom and Ewell Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, West Sussex County Council, Surrey County Council and Tandridge District Council

⁶ Which can be accessed from each of the Northern West Sussex Authorities' websites:

Crawley -

http://www.crawley.gov.uk/pw/Planning_and_Development/Planning_Policy/GatwickDiamondLocalStrategicStatement/index.htm

Horsham - <http://www.horsham.gov.uk/planningpolicy/planning-policy/gatwick-diamond>;

Mid Sussex - <http://www.midsussex.gov.uk/8573.htm>.

⁷ Adur and Worthing Councils, Arun District Council, Brighton and Hove City Council, Chichester District Council, Crawley Borough Council, Horsham District Council, Lewes and Eastbourne Councils, Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council.

The three local authorities have continued to commission joint evidence, including:

- the Employment Growth Assessment (initially started in 2009, updated in 2010, 2014, and November 2019);
- the Strategic Housing Market Assessment (initially started in 2009, updated in 2012, 2014, 2016 and November 2019);
- the Gatwick Water Cycle Study 2011⁸, reviewed in 2020⁹, and catchment based flood risk assessments.
- the Sussex North Water Resource Zone Water Neutrality Strategy¹⁰.

The authorities, as a matter of course, share methodologies and emerging evidence to ensure consistency and compatibility throughout the area, even if studies are being produced separately¹¹.

Adopted Local Plans

The Local Plans for Crawley, Horsham and Mid Sussex were adopted, respectively, in 2015, 2015 and 2018. The Crawley Borough Local Plan underwent a five-year policy review in December 2020 which confirmed it remained up-to-date for Development Management purposes. The Mid Sussex Site Allocations Development Plan Document was adopted in 2022.

The West Sussex Joint Minerals Plan was adopted in 2018, and the Soft Sand Review was adopted in 2021. It covers the period to 2033. The five-year assessment in 2023, confirmed that it remained 'relevant and effective' therefore, no formal review is required at this time (in whole or in part). The West Sussex Waste Plan was adopted in 2014 and covers the period to 2031. The five-year assessment in 2024 confirmed that it remained 'relevant and effective' therefore, no formal review was required (in whole or in part). The West Sussex Transport Plan was adopted in 2022 and covers the period to 2036.

Local Plan Reviews

The Local Plan reviews for Crawley, Mid Sussex and Horsham are all at an advanced stage of preparation. The Crawley Borough Local Plan review is at a late stage of examination, having completed Modifications Consultation and awaiting the final Inspectors' report and is therefore more progressed than the Horsham and Mid Sussex plans which have reached Regulation 19 stage.

4.Strategic Matters

The specific strategic matters which the authorities have determined are relevant across the boundaries of the authorities are:

- Employment and economic development: including economic development needs and Gatwick Airport.
- Housing need: including overall housing need, affordable housing need and the needs of specialised housing.
- Specific aspects of infrastructure development: including transport, flooding, water supply and waste water treatment, education and health.
- Strategic sites and/or sites on the boundaries between authorities.

⁸ Gatwick Sub-Region Water Cycle Study (2011) Entec UK Limited [Final Report](#)

⁹ Gatwick Sub-Region Water Cycle Study (2020) JBA Consulting
https://crawley.gov.uk/sites/default/files/2021-01/Gatwick_sub_region_water_cycle_study_August_2020.pdf

¹⁰ Sussex North Water Neutrality Study: Part C – Mitigation Strategy (JBA Consulting, December 2022)

¹¹ These include: Strategic Housing Land Availability Assessments; transport modelling; and Gypsy and Traveller Accommodation Needs Assessments.

Employment and economic development:

The Northern West Sussex Authorities are located within the wider economic areas of the former Coast to Capital Local Enterprise Partnership and the Gatwick Diamond. Joint evidence base work dates back to 2009:

- Employment Land Review (part 1 and part 2), CBC, HDC, MSDC (2009/2010)
- Gatwick Diamond Local Strategic Statement, CBC, HDC, MSDC, MVDC, RBBC, SCC, WSCC (2012, 2016)
- Economic Growth Assessment, CBC, HDC, MSDC (2014)
- Economic Growth Assessment Review, CBC, HDC (2019), MSDC (2020, 2022)

Each authority is undertaking focused updates of this evidence with other authority support, where appropriate, ahead of their respective Local Plan submission.

Separately, as part of the DCO process, the authorities are working collaboratively, with Gatwick Airport and other Gatwick authorities¹², to understand the implications of expansion of the airport for the local economy and local communities, challenging the mitigations proposed as appropriate.

1. The parties agree the approaches to employment development in currently adopted Local Plans support the economic growth of the Functional Economic Area.

Housing need:

The Northern West Sussex Housing Statement of Common Ground (2024 or subsequent updates) details the position agreed between the NWS Authorities in relation to meeting housing needs.

Infrastructure:

The Northern West Sussex Authorities are in agreement that **transport infrastructure** required to deliver development in the north of the area is a significant constraint over the lifetime of the respective plans. The three councils will continue to share information as transport studies are updated and will work together where necessary to resolve any cross-boundary issues alongside other partners including WSCC and National Highways.

The Northern West Sussex Authorities have been working jointly, along with Chichester District Council and South Downs National Park Authority, Natural England, Environment Agency and Southern Water to address **water supply** capacity constraints arising from impacts of water abstraction on internationally protected habitats. This is detailed in the Water Neutrality Statement of Common Ground (2023 or subsequent updates), along with evidence study documents (Water Neutrality Strategy Parts A-C, JBA) and the joint Water Neutrality Topic Paper¹³. A joint local plan policy has been agreed and work is ongoing to establish a joint offsetting implementation scheme, led by a joint Water Neutrality Project Manager.

The Northern West Sussex Authorities are in agreement that **waste water** capacity is a constraint to development in the area, particularly in relation to “At Crawley” sites which might rely on the Crawley Wastewater Treatment Works, over the lifetime of the respective plans. For the adopted Plans, the water companies confirmed they could manage capacity through improvements to technology. This has been considered jointly with the water companies and the EA through the Gatwick Water Cycle Study review.

The Gatwick Water Cycle Study was originally commissioned in 2011 to look at the issue of Waste Water Treatment Works and the implication of development on water quality in the area. The Gatwick Water Cycle Study indicates that the EA has a clear position on private sewage treatment works: they will not normally grant discharge consents for a private sewerage treatments system where it is more

reasonable to connect to a public foul sewer. A review of the Water Cycle Study was commissioned by the authorities, along with Reigate and Banstead Borough Council and published in 2020.

Crawley has a recognised unmet need for **secondary education**. This is identified as amounting to 4 forms of entry (120 places per year group) with two further forms of entry being provided by existing schools within the borough already. This need is in addition to the Gatwick Free School which received permanent planning permission in December 2022 and provides 4 forms of entry (120 places per year group) which in part addresses the growth in numbers at primary from 2012 amounting to 10 forms of entry in total (300 places per year group). The further 4 forms of entry of demand for secondary school places is in the short and medium term. In the longer term numbers are expected to plateau as entry to primary schools is now falling after a rapid rise from 2012. When the Crawley Borough Local Plan 2030 was adopted (December 2015), it was anticipated by WSCC that they would explore options for the extension of existing secondary schools within the Borough, although the Infrastructure Delivery Plan recognised the need for places might be supplied by a new school. In 2017 the DfE announced a new 6 form entry plus a sixth form Secondary Free School, 'Forge Wood High', to be sponsored by a high performing multi-academy trust, the Glynn Learning Foundation. However, given Crawley's constrained land supply, no suitable site has been found to build the school. Therefore, the potential to provide additional secondary school places, to serve Crawley's needs, will be considered on sites close to Crawley in neighbouring authorities. A suitable site has been identified by HDC, WSCC, Homes England and DfE, in Horsham District close to Crawley, as part of the proposed strategic site allocation 'Land West of Ifield' and the DfE will seek to bring forward a school as early as possible – however Crawley BC is opposed to the proposals to allocate the West of Ifield site. In the meantime, WSCC will look to a combination of permanent and temporary expansions to cater for additional places.

2. The parties agree to work together to identify and secure the necessary infrastructure to support growth across Northern West Sussex including:

a. Transport: including with reference to maximising opportunities for sustainable and active travel:

Public Transport – rail station, bus priority and passenger waiting infrastructure alongside bus service network extensions;

Active Travel - cycling, walking, equestrian, public rights of way;

Crawley Western Multi Modal Transport Link - exploring further the need for, and, if so, opportunities to secure the implementation of, a Crawley Western Multi Modal Transport Link Corridor for which an area of search is identified in the emerging Crawley and Horsham local plans respectively. Transport studies have been undertaken to identify transport mitigation measures for Horsham and Mid Sussex Local Plans. Further work is currently being undertaken on the Mid Sussex study, both on a further scenario to confirm resolution of remaining potential severe impact locations and on completion of the road safety study. Similar sensitivity and road safety work on the Horsham study was completed in April 2024. Transport study work for the Crawley Local Plan was completed in summer 2022.

b. Education – secondary school and wider education needs, to provide for the needs of new communities, and existing latent demand – notwithstanding CBC's objection to the West of Ifield site, should the site allocation be accepted by the Local Plan Inspector and confirmed then this should include a new secondary school.

¹² WSCC, SCC, ESCC, KCC, CBC, HDC, MSDC, TDC, RBBC, MVDC

¹³ Joint Water Neutrality Topic Paper (2023) CDC, CBC, HDC

<https://crawley.gov.uk/sites/default/files/2023-05/9.%20Joint%20Topic%20Paper%20Water%20Neutrality%20May%202023.pdf>

c. Health – there is recognised capacity constraint on GP provision across the area, particularly with the decision by the NHS not to bring forward new provision as originally planned within the Forge Wood and Kilnwood Vale neighbourhoods. However, the introduction of Primary Care Networks is anticipated by the Integrated Care System to enhance capacity.

d. Water/Waste Water Treatment facility enhancements to respond appropriately to emerging evidence.

e. Renewable energy generation to help tackle climate change: cross-boundary infrastructure/measures which will help achieve nationally- and locally-set targets.

f. Cross-boundary flood mitigation measures as appropriate.

g. Green Infrastructure enhancements such as G.I. network enhancements and corridor improvements across boundaries.

Strategic Sites and/or Sites on the Boundaries between Authorities:

3. Where strategic development is proposed on the administrative boundaries within the Housing Market Area, the authorities will work together to establish a joint Planning Policy position to support positive Development Management.

5. Governance Arrangements

The three authorities of CBC, HDC and MSDC recognise that there are different local circumstances which need to be taken into account as part of any joint working including:

- Each authority has different land constraints and development pressures;
- Each authority may be at a different stage in the process of producing their plans; and,
- There are issues better addressed through bilateral or other arrangements.

Despite these limits, the authorities are committed to working positively together and as part of the Gatwick Diamond and the West Sussex and Greater Brighton group, sharing information and best practice and continuing to procure evidence jointly, where relevant, throughout the plan preparation phase and beyond. This co-operation and collaboration takes place at senior Member, Chief Executive and senior officer as well as at technical officer level.

4. It has been agreed between the Authorities that:

- a. A joint Local Plan does not need to be produced at this stage, although an adopted local Joint Area Action Plan exists between Crawley Borough and Horsham District Councils, and the need for a Joint Supplementary Plan or additional joint Policies, between some or all of the Authorities, will be kept under review and considered if circumstances warrant this;*
- b. 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, prioritising the needs of the Housing Market Area; and,*
- c. They will continue to work with the other Gatwick Diamond and West Sussex and Greater Brighton authorities on housing, employment and other strategic issues affecting the Gatwick Diamond and West Sussex and Greater Brighton as a whole.*

5. To work collaboratively on Plan preparation and evidence whilst acknowledging others' timetables and timescales. To respect each other's right to develop their own plans that fit the specific circumstances of the District/Borough's communities.

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

7. To consider the role and extent of the Housing Market Area in relation to the Strategic Matters for Planning.

8. *To liaise jointly, and individually, with adjoining Authorities and those in overlapping Housing Market Areas as well as other cross-authority Geographies (such as the Functional Economic Areas, City-Region, Gatwick Area, River Basin and relating to Habitat Regulations).*
9. *To work to produce a joint evidence base on relevant issues wherever possible and logical, and to continue to keep each updated where commissioning evidence to ensure consistency is maintained.*
10. *This SoCG will be updated as progress of the respective Local Plan reviews continues.*

6. Timetable for review and ongoing cooperation

LPA	Present Plan Adoption	Proposed Plan Review Date	Reg.18 Date	Reg.19 Date	Submission Date	Adoption
Crawley	Dec 2015		July/Sep 2019	Jan/Mar 2020 Jan/Jun 2021 May/Jun 2023	July 2023	Summer/Autumn 2024
Horsham	Nov 2015		Feb/Mar 2020	Jan/Mar 2024	July 2024	Spring/Summer 2025
Mid Sussex	Mar 2018		Nov/Dec 2022	Jan/Feb 2024	Summer 2024	2025
West Sussex Minerals	July 2018	Further Five Year Assessment due 2028	Not known	Not known	Not known	Not known
West Sussex Minerals – Soft Sand Review	March 2021		N/A	N/A	N/A	N/A
West Sussex Waste	April 2014	Further Five Year Assessment due 2029	Not known	Not known	Not known	Not known