

**NORTHERN WEST SUSSEX AUTHORITIES**  
**POSITION STATEMENT (revised March 2015)**

**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 and revised in July 2014.

**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 proposals at Crawley involved development beyond the borough boundary, a joint area action plan between Horsham and Crawley was produced. With the introduction of the Localism Act and the Duty to Cooperate, joint working has continued and strengthened with the three authorities collaborating together on a number of strategic issues.
- 2.3 The authorities also work with partners in the wider 'Gatwick Diamond'<sup>1</sup> 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 three authorities have worked on and signed up to the Gatwick Diamond Local Strategic Statement and the Memorandum of Understanding<sup>2</sup>. This sets out a vision to help ensure that '*by 2016 the Gatwick Diamond will be a world-class, internationally recognised business location achieving sustainable prosperity.*' In doing so, the statement recognises the strength of the Gatwick Diamond as a business location, and has regard to the strong demand to locate there.
- 2.4 More recently, the three authorities became part of the new 'Coast to Capital' Local Enterprise Partnership. This area stretches 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. The Coast to Capital Local Enterprise Partnership (LEP) has published its Strategic Economic Plan (2014) which aims to encourage growth across the Coast to Capital region as well as supporting its thriving business base. This strategy has the potential to be a significant factor in the way in which resources are prioritised and directed to infrastructure projects. The three

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<sup>1</sup> 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

<sup>2</sup> 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](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>.

authorities are working together with other authorities in the Gatwick Diamond to continue effective input into the LEP. They will be urging the LEP to assist in unlocking stalled housing and employment sites within the LEP area, including within the Gatwick Diamond area and along the Sussex Coast, in order to achieve its aim to be one of the leading economic regions in the UK whilst maintaining its special/high environmental quality which attracts investment to the area.

- 2.5 A Strategic Housing Market Assessment has been produced for the three authority areas since 2009. The assessment initially identified, and subsequent reviews have confirmed that the County had two separate Housing Market Areas. Crawley Borough Council, Horsham District Council and Mid Sussex District Council were identified as sharing a common Housing Market Area, the 'Northern West Sussex Housing Market Area' centred around Gatwick Airport. This area is distinct from that of the West Sussex Coastal Authorities (Adur District Council, Arun District Council, Chichester District Council and Worthing Borough Council together with the South Downs National Park Authority).
- 2.6 Whilst recognising that housing markets are not totally discrete, the three authorities continue to work and plan for this distinct Housing Market Area, and are building upon this evidence in the preparation of their respective Local Plans. The Northern West Sussex Authorities have engaged 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), whilst work on the delivery of housing continues to progress based on the separate housing market areas within the Sussex Coast and the Gatwick Diamond. In a similar way, and with the agreement of the other authorities in the Gatwick Diamond area, the Northern West Sussex housing market area has been treated separately from the East Surrey housing market area. Where overlaps between these two housing market areas exist, these are being considered with the other authorities within the context of the Local Strategic Statement and the Memorandum of Understanding, and in Local Plan references, such as Reigate and Banstead.
- 2.7 The three local authorities have continued to commission joint evidence, including: the Employment Land Review started in 2009 (updated in 2010 and 2014), the Strategic Housing Market Assessment 2009 (updated in 2012 and 2014), the New Market Town Study (2009), the At Crawley Study (2010) and an update to the Employment Land Review, including an Economic Growth Assessment (2014). The authorities have also worked collaboratively on other studies relevant to the wider Gatwick Diamond area including the Gatwick Water Cycle Study 2011 and catchment based flood risk assessments. 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 separately. These include Locally Generated Housing Needs Studies/Local Housing Assessments, Strategic Sites and Broad Locations across the Housing Market Area (SHLAA appendix) and Gypsy and Traveller Accommodation Needs Assessments. Further information on the work by the three authorities in relation to the housing evidence is set out in Section 6.

### **3. Principles of Joint Working**

- 3.1 The Gatwick Diamond Local Authorities Memorandum of Understanding, to which the three authorities are party, established a broad framework for cooperation across the Gatwick Diamond Area. Within this context, the three authorities agreed the following additional principles to guide their joint working:

To plan positively and achieve sustainable development in line with the National Planning Policy Framework requirements;

To respect each other's right to develop their own plans that fit the specific circumstances of the District/Borough's communities;  
To work to produce a joint evidence base on relevant issues; and  
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 an adopted local Joint Area Action Plan exists between Crawley Borough and Horsham District Councils);  
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,  
They will continue to work with the other Gatwick Diamond authorities on housing, employment and other strategic issues affecting the Gatwick Diamond as a whole.
- 3.3 The specific strategic matters which the three authorities have determined are relevant across the boundaries of the authorities are:  
Employment and economic development.  
Housing need.  
Specific aspects of infrastructure development.

#### **4. Limitations on Joint Working**

- 4.1 The three authorities recognise that there are limits to joint working including:  
Each authority has different local circumstances;  
Each authority is at a different stage in the process of producing their plans; and,  
There are issues better addressed through bilateral or other arrangements, examples of these are described in Section 8 below.  
Despite these limits, the three authorities are committed to working positively together and as part of the Gatwick Diamond, 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.

#### **5. Employment and Economic Development**

##### Aim

- 5.1 The aim agreed by the three authorities is to secure policies which support realistic and sustainable levels of economic growth in the area, tailored to the particular needs of the individual local authority areas.

##### Action Taken to Date

- 5.2 The Northern West Sussex Authorities are located within the wider economic areas of the Coast to Capital Local Enterprise Partnership and the Gatwick Diamond. Between 2009 and 2010, the three local authorities worked closely together to commission a joint, PPS4 compliant, Employment Land Review (part 1 and part 2) to inform their respective plans. In 2012, the Authorities (along with Mole Valley District Council, Reigate & Banstead Borough Council, Surrey and West Sussex County Councils) endorsed the Gatwick Diamond Local Strategic Statement which included agreement to a broad approach designed to support the growth of the Gatwick Diamond economy. The three authorities through the LSS and their individual planning policies 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. The Northern West Sussex Authorities' Economic Growth Assessment,

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, focusing on the needs arising from the Gatwick Diamond economy. Crawley, Horsham and Mid Sussex have continued to work with the other Gatwick Diamond authorities and the wider LEP area 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 below.
- 6.4 Horsham and Mid Sussex share some environmental designations such as the High Weald Area of Outstanding Natural Beauty and both planning authorities are affected by the 3T1 0 0 08pa6ns

located at the base of the South Downs scarp slope are bounded to the south by the



**Table 1 – Objectively Assessed Housing Needs and proposed housing provision – Northern West Sussex Authorities**

	<b>Mid Sussex<sup>1</sup></b>
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a whole, taking into account local constraints, and the need for sustainable development.

- 6.22 The Sussex Coastal Housing Market Area has identified a significant shortfall of housing provision, and the three northern West Sussex authorities will continue to work with the Sussex Coastal authorities and within the Northern West Sussex Housing Market Area to understand how the projected housing shortfalls in both areas can be reduced. In particular, they will be working with the LEP to see how they can help remove barriers and constraints to development in the Gatwick Diamond and along the Sussex Coast

- 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.
- 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 constrains 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 three authorities. Although undertaking separate studies, Crawley and Mid Sussex commissioned the same transport consultant to undertake the work using the similar transport modelling data for both authorities.
- 7.6 Horsham undertook a Transport and Development Study to determine the cumulative impact on the highway network and public transport as a result of three main locations, future potential development in Horsham town centre and the planned strategic growth proposed by the Horsham District Planning Framework at land north of Horsham town, Southwater and Billingshurst.
- 7.7 Further assessments will be carried out to understand the combined models and ensure consistency of data/messages and cumulative impact of all three Plans. Horsham District Council are modelling 750 dwellings per annum.

#### Outcomes

- 7.8 The Northern West Sussex Authorities are in agreement that waste water capacity is a constraint to development in the area, over the lifetime of the respective plans. Additional work may need to be undertaken by the three authorities to look in detail at what long-term actions are necessary to inform the future business plans of the water companies that deliver waste water treatment within the area in conjunction with the Environment Agency and the water companies.
- 7.9 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 the LEP, West Sussex County Council or the Highways Agency.

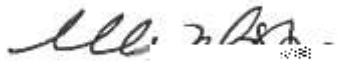
#### **8. Matters to be dealt with elsewhere**

- 8.1 As indicated earlier in this statement the Northern West Sussex Authorities will continue to work on the full range of strategic issues with the other Gatwick Diamond authorities. Some issues between two authorities and those across the wider Gatwick Diamond will need to be dealt with separately from this statement as set out below.
- 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: including the Airports Commission recommendation and the subsequent government decision;

- 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, Horsham 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

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**Horsham District Council**  
**Councillor Claire Vickers, Cabinet member for Living and Working Communities**

A handwritten signature in black ink, appearing to read 'N. Webster', is positioned above the text for Norman Webster.

**Mid Sussex District Council**  
**Councillor Norman Webster, Cabinet Member for Planning**

## **APPENDIX A: Localism Act 2011 – Duty to Co-operate**

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

- (1) In Part 2 of the Planning and Compulsory Purchase Act 2004 (local development) after section 33 insert—

### **“33A Duty to co-operate in relation to planning of sustainable development**

- (1) Each person who is—  
(a) a local planning authority,  
(b)

- (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—

- (a) considering whether to consult on and prepare, and enter into and publish, agreements on joint approaches to the undertaking of activities within subsection (3), and
- (b) if the person is a local planning authority, considering whether to agree under section 28 to prepare joint local development documents.

(7)

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

### Planning strategically across local boundaries

Include para 159 as this is quoted in the Position Statement.

‘178. Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the **strategic priorities** set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

179. Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.

180. Local planning authorities should take account of different geographic areas, including travel-to-work areas. In two tier areas, county and district authorities should cooperate with each other on relevant issues. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. Local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers.

181. Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted.

## APPENDIX C: MAP OF THE NORTHERN WEST SUSSEX AUTHORITIES

