

**NORTHERN WEST SUSSEX AUTHORITIES**

**POSITION**

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;





### 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 South Downs National Park.
- 6.5 Mid Sussex District Council has recently published a Capacity Study which demonstrates that 92% of the District is covered by primary constraints (such as AONB) or secondary constraints (such as low landscape capacity). A further 4% is already built upon. An important secondary constraint is the Ashdown Forest (Special Protection Area and Special Area of Conservation) where new housing development within 7km of the Forest has an impact on the protected bird populations. Although small-scale housing development (with mitigation) is likely to come forward within that 7km zone, it does limit the deliverability of large scale development, particularly at East Grinstead, which is also constrained by the A22/A264 acknowledged congestion problems.
- 6.6 Consultants commissioned by MSDC have undertaken a sustainability assessment of cross-boundary options for the Mid Sussex District Plan and, as part of this process, MSDC wrote on the 5th August 2014 to neighbouring local planning authorities, including Crawley Borough Council and Horsham District Council, to confirm formally whether they have unmet needs that they are seeking assistance with, and the detailed nature of any such needs.
- 6.7 The results of the sustainability assessment were shared with the neighbouring authorities, including CBC and HDC. MSDC has also shared the results of its updated work on housing need and supply. This evidence indicates an objectively assessed housing need of 627 homes per annum 2014-2031. A supply of 650 homes per annum is recommended in the proposed District Plan over the same period. The sustainability assessment advises that any supply in excess of local need is most likely to be absorbed by Crawley and Brighton & Hove, which have the strongest economic and functional links with Mid Sussex.
- 6.8 Within Horsham, just over 14.3% lies within the South Downs National Park and there is also the High Weald AONB, covering around 7% of the District situated in the north-east of the District, adjacent to the main towns of Horsham and Crawley. Due to historic patterns of land use, much of the landscape of the District is still heavily wooded, a considerable amount of which, over 6% is classified as ancient woodland. Approximately 8% of the land is designated for its importance in nature conservation terms, including the Arun Valley Special Protection Area and the Mens Woodland SAC, which are of international importance. The Mens Woodland SAC has a secondary area of constraint relating to the protection of bats which forage beyond the Internationally-designated site. Any new housing within secondary protection areas identified by the buffer zones around the SPAs has the potential to impact on protected species and the integrity of the protected habitat. The string of settlements

located at the base of the South Downs scarp slope are bounded to the south by the South Downs National Park and flood plains of the river Arun or Adur to the north. These settlements are, therefore, particularly constrained. 6% of the district is located within functional floodplain, however, the majority of the district is very rural in character with its natural fluvial and surface water management role.

- 6.9 The Inspector undertaking the examination of the Horsham District Planning Framework issued his Initial Findings on 19 December 2014. This highlighted a need for additional work to be

be in draft format as the

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

	<b>Mid Sussex</b>	<b>Crawley</b>	<b>Horsham</b>	<b>TOTAL</b>
Demographic Need – Natural Change (Zero Net Migration)	166	395	190	<b>751</b>
Baseline Demographic Need (including migration)	570	533	600	<b>1,703</b>
Objectively Assessed Need	627	586	696	<b>1,909 net dwellings per annum</b>
Proposed Housing Provision	650	334	750	<b>1,734 net dwellings per annum</b>

6.19 Table 1 above shows that the Northern West Sussex Housing Market Area will be meeting its own internal demographic growth needs, including migration, in full. The housing shortfall



## 7. Infrastructure

### Aims

- 7.1 The aim agreed by the three authorities is to understand which cross boundary infrastructure issues, needs or projects should appropriately be addressed jointly by the Northern West Sussex Authorities in the context of their emerging plans to manage patterns of growth to maximise development in sustainable locations and to secure infrastructure to deliver planned growth. The three authorities also aim to ensure that the level of development is consistent with infrastructure required to deliver development in the Northern West Sussex area over the lifetime of the respective plans.

### Action Taken to Date

- 7.2 An assessment of the capacity of the Waste Water Treatment Works at Crawley was undertaken in the 'At Crawley Study'<sup>9</sup> and subsequently reinforced by updated information sought from the infrastructure providers during August/September 2014. This has confirmed that there is only capacity prior to 2021 at the Crawley treatment works to accommodate two strategic sites. These are Kilnwood Vale and Forge Wood at Crawley, which are both now under construction. The Gatwick Water Cycle Study was also 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 Environment Agency 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.
- 7.3 The capacity of Goddards Green Wastewater Treatment Works near Burgess Hill in Mid Sussex area has an enforced limit of the level of development acceptable within the catchment area of the treatment works which is imposed by a) the capacity of the works and b) the limit of the discharge license approved by the Environment Agency. This relates to the already poor water quality in the River Adur, into which this Waste Water Treatment Works discharges. Southern Water have confirmed that due to changes in discharge licences arrangements with the Environment Agency in 2013, capacity has increased slightly and the Treatment Works can accommodate the development proposed in the Mid Sussex District Plan. This arrangement will not cover any additional development beyond that was proposed in the Mid Sussex District Plan submitted in July 2013 (since withdrawn).
- 7.4 An assessment of the transport requirements for strategic locations at Crawley was undertaken in the 'At Crawley Study'. This identified that significant investment would be needed in highway infrastructure including the need for a western relief road around Crawley in the event of significant further development west of Crawley.
- 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.

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<sup>9</sup> Crawley Borough Council, Horsham District Council & Mid Sussex District Council "At Crawley Study 2009" Final Report (October 2009) GL Hearn

- 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.

Diamond Local Strategic Statement, but it is also accepted that the character and supporting roles of other town centres needs to be recognised with some regeneration to perform vital roles for their community; and,

- e. The low carbon economy is to be dealt by the individual authorities working either on their own or, as appropriate, with others. They will maintain an awareness of initiatives which are coming forward so that joint working can be put in place if appropriate.

## **9. Process for Review and Further Engagement**

- 9.1 The three authorities will continue to collaborate extensively as the Northern West Sussex Authorities and through the Gatwick Diamond to ensure that the on-going requirements of the Duty to Co-operate are met. This includes continued engagement with adjacent housing market and economic areas such as the Coastal Authorities and London. All three authorities are working together on the housing and economic growth requirements. There is senior Member and officer commitment to continue to collaborate and develop joint solutions to issues. The three authorities have developed a strong understanding of the housing market area and will continue to respond to new issues and changing circumstances together, as the three authorities' plans progress to submission and approval.

### **Signature**



**Crawley Borough Council**  
**Councillor Peter Smith, Cabinet Member for Planning and Economic Development**



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



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

- (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) A person subject to the duty under subsection (1) must have regard to any guidance given by the Secretary of State about how the duty is to be complied with.
- (8) A person, or description of persons, may be prescribed for the purposes of subsection (1)(c) only if the person, or persons of that description, exercise functions for the purposes of an enactment.
- (9)

**APPENDIX B:**

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

