



Horsham  
District  
Council

# Horsham District Council Authority Monitoring Report

1st April 2023 - 31st March 2024

## CHAPTER 2: Duty to Cooperate

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Contents

Introduction ..... 3

Duty-to-Cooperate Mechanisms ..... 3

Duty-to-Cooperate Actions: April 2023 - December 2024 ..... 6

## Introduction

- 2.1 The Localism Act 2011 and the National Planning Policy Framework 2024<sup>1</sup> places a legal 'Duty to Co-operate' on local planning authorities and other prescribed bodies to address strategic planning issues relevant to their areas in the preparation of their local plans and other planning documents and to work together on such issues. Horsham District Council is obliged to determine what work needs to be done at a strategic level and in doing so decide how to work with neighbouring authorities to bring forward the required levels of growth. It is a legal requirement that where local authorities have worked together under the Duty to Co-operate mechanism, that the Monitoring Report provides details of the actions that have taken place during the monitoring period.

## Duty-to-Cooperate Mechanisms

- 2.2 The Duty to Co-operate requires cross-boundary discussions with a range of local authorities, both adjoining and beyond the boundary of Horsham District. There are a number of different groups with whom Horsham District has a relationship. These are set out in Table 1 below. These groups meet on a regular basis to discuss the requirements of local authorities, and how these may be met across the sub-region.

**Table 1: Duty to Cooperate Groupings**

Grouping	Description	Partners
Northern West Sussex Authorities	<p>A collection of three local planning authorities which share a strategic housing market area and have history of working together on housing and economic matters.</p> <p>Cooperation is evident at multiple levels, ranging from meetings of political leaders and portfolio holders, Chief Executives, as well as regular meetings at an officer level. West Sussex County Council have regular input into such forums in their role as the planning authority for minerals and waste, as well as their responsibilities for strategic infrastructure (such as education and highways).</p>	Crawley Borough Council, Mid Sussex District Council, West Sussex County Council.
West Sussex and Greater Brighton	<p>A collection of authorities that work together on strategic matters across West Sussex and beyond, to include the greater Brighton area. Cooperation has occurred at multiple levels, including:</p>	Adur District Council, Arun District Council, Brighton & Hove City Council, Chichester District Council, Crawley Borough Council, East Sussex County

<sup>1</sup> See Paragraph 24 of the NPPF 2024.

Grouping	Description	Partners
	<ul style="list-style-type: none"> <li>- Leaders and Chief Executives of the respective Councils and National Park Authority</li> <li>- Greater Brighton Economic Board</li> <li>- West Sussex and Greater Brighton Strategic Planning Board – consisting of portfolio holders with responsibility for planning, together with senior officers that has been the main forum for sub-regional planning issues</li> <li>- West Sussex and Greater Brighton Planning Officers Groups – consisting of senior officers to undertake work as directed by the Strategic Planning Board</li> </ul>	Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council
West Sussex Planning Policy Officers Group	An officer forum from all of the West Sussex local planning authorities and National Park Authority for discussion of matters relating to the preparation of respective Local and Neighbourhood Plans	Adur District Council, Arun District Council, Chichester District Council, Crawley Borough Council, Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council
Gatwick Diamond Authorities	The Gatwick Diamond Initiative was established as a private/public sector initiative. Though the initiative has more recently formed a central part of the Coast to Capital LEPs work, officers from the Gatwick Diamond authorities still meet regularly to discuss cross boundary, strategic matters.	Crawley Borough Council, Epsom & Ewell Borough Council, Mid Sussex District Council, Mole Valley District Council, Reigate & Banstead Borough Council, Surrey County Council, Tandridge District Council, West Sussex County Council
High Weald AONB Partnership	A partnership of authorities and bodies that includes within their areas the High Weald AONB designation. The partnership produces and maintains the High Weald Management Plan which seeks to conserve and enhance the Area of Outstanding Natural Beauty.	Ashford Borough Council, Crawley Borough Council, East Sussex County Council, Hastings Borough Council, Kent County Council, Mid Sussex District Council, Mole Valley District Council, Natural England, Rother District Council, Sevenoaks District Council, Surrey County Council, Tandridge District Council, Tonbridge & Malling Borough Council, Tunbridge Wells Borough Council, Wealden District Council, West Sussex County Council

Grouping	Description	Partners
Gatwick Airport Authorities	<p>A group of authorities who work together on matters relating to the development of Gatwick Airport. Of particular relevance to the Local Plan is the Gatwick Officers Group.</p> <p>The main focus of the Group's work has been dealing with Gatwick Airport's proposed Northern Runway Development Consent Order (DCO), which includes working with Gatwick Airport Ltd.</p>	Crawley Borough Council, East Sussex County Council, Mid Sussex District Council, Mole Valley District Council, Reigate & Banstead Borough Council, Surrey County Council, Tandridge District Council, West Sussex County Council
Sussex North Water Resource Zone Authorities	<p>A group of authorities located within the Sussex North Water Resource Zone affected by the need for new development to demonstrate water neutrality since receiving Natural England's Position Statement in September 2021.</p> <p>A formalised governance structure exists and ensures cooperation on this issue at various levels. As well as meetings of the political leadership, sub-groups include:</p> <ul style="list-style-type: none"> <li>- Chief Executive Board – consisting of Chief Executives, senior council officers and representatives from DLUHC, DEFRA, Environment Agency, Natural England, Ofwat and Southern Water to make strategic decisions, share information and discuss progress in relation to water neutrality</li> <li>- Lead Officers Group – consisting of senior officers from the local planning authorities, West Sussex County Council, Environment Agency and Natural England which reports to the Chief Executive Board and directs work to the Planning Policy Working Group, Offsetting Implementation Group and Development Management Working Group</li> </ul> <p>Planning Policy Working Group – consisting of Planning Policy Officers to progress policy in relation to water neutrality.</p> <p>Offsetting Implementation Group – A group led by the shared Water Neutrality Project Manager to progress the joint authority offsetting scheme (SNOWS)</p> <p>Development Management Working Group – A group of DM officers who share knowledge and experience relating to water neutrality and planning applications.</p>	Chichester District Council, Crawley Borough Council, DEFRA, DLUHC, Environment Agency, Mid Sussex District Council, Natural England, Ofwat, South Downs National Park Authority, Southern Water, West Sussex County Council
Sussex Local	A group of authorities that share knowledge and information in relation to local nature recovery	Adur District Council, Arun District Council, Brighton & Hove

Grouping	Description	Partners
Nature Partnership Local Authorities Network	across Sussex. The group focuses on the implementation of the requirement for Biodiversity Net Gain as well as the development of Local Nature Recovery Strategies	City Council, Chichester District Council, Crawley Borough Council, East Sussex County Council, Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, Mid Sussex District Council, Rother District Council, South Downs National Park Authority, West Sussex County Council

### Duty-to-Cooperate Actions: April 2023 - December 2024

- 2.3 The Duty to Co-operate is an ongoing process and regular discussions and meetings are held with a wide range of organisations in order to support the preparation of the Local Plan. A Duty to Cooperate Statement<sup>2</sup> has been published which details all of the activities and outcomes undertaken over the course of the preparing the Local Plan and covers major cross boundary issues relating to the topics of water neutrality, housing, employment, infrastructure, environment and Gypsies and Travellers.
- 2.4 The focus of much of the Council's work with Duty to Cooperate partners during 2023 and 2024 has been with regards to water neutrality. This has required significant joint working with a wide range of local authorities and other partners, such as Natural England and the Environment Agency, to address this issue. A summary of activities undertaken with respect to key issues are presented below. More information is set out in the Duty to Cooperate Statement.

**Table 2: Water neutrality key activities and documents**

Document/Activity	Commentary	Partners
<b>Water Neutrality</b>		
Joint Topic Paper: Water Neutrality (May 2023) and Update (July 2024)	Document that details joint work with regards to water neutrality and identifies next steps.	Chichester District Council, Crawley Borough Council, Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council
Sussex North Water Resource Zone	Sets out agreed positions with regards to achieving	Chichester District Council, Crawley Borough Council, Environment Agency,

<sup>2</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0018/138312/SD12-Duty-to-Cooperate-Statement.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0018/138312/SD12-Duty-to-Cooperate-Statement.pdf)

Document/Activity	Commentary	Partners
Statement of Common Ground – Water Neutrality (July 2023)	water neutrality in the WRZ.	Mid Sussex District Council, Natural England, South Downs National Park Authority, Southern Water, West Sussex County Council
Joint model local plan policy	Developed to ensure a consistent approach to the determination of planning applications across the SNWRZ with respect to the issue of water neutrality.	Chichester District Council, Crawley Borough Council, Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council
<b>Housing</b>		
Northern West Sussex Housing Market Area – Statement of Common Ground: Housing (July 2024)	Describes the history of joint working in the NWS HMA, sets out the scale of need in the HMA and an agreed position for addressing the need	Crawley Borough Council, Mid Sussex District Council.
Statements of Common Ground	The issue of housing need is referenced in all bilateral SoCGs between HDC and other partners, as well as in the North West Sussex Housing Market Authorities SoCG.	Various.
<b>Infrastructure</b>		
Transport Studies & Highway Safety Review (Stantec, 2021-2024)	<p>Set of studies that developed a model and then tested the impact of growth on the highways network. Highways Safety Study identified junctions with high collision rates and looked at the impacts of growth on such junctions and mitigation.</p> <p>West Sussex County Council and National Highways (formerly Highways England) were involved in the work given their responsibilities with respect to the local highway network and strategic road network, respectively.</p>	National Highways, West Sussex County Council

Document/Activity	Commentary	Partners
Infrastructure Delivery Plan 2024	<p>Evidence base document outlining infrastructure baseline, current issues and plans and projects likely to be required to deliver development put forward in the Local Plan.</p> <p>Developed with engagement with infrastructure and service providers.</p>	<p>Infrastructure providers, including:</p> <p>Bus service providers, Environment Agency, Govia Thameslink, Horsham District Council, National Grid, Network Rail, SECamb, SGN, Southern Water, SSEN, Sussex Police, Thames Water, UKPN, West Sussex ICB, West Sussex County Council</p>
<b>Environment</b>		
Sustainability Appraisal (including Strategic Environmental Assessment) Work (2019 – 2024)	<p>Set of documents assessing the impact of Local Plan on objectives (including environmental objectives). Developed with engagement from the environmental bodies. Water neutrality policy jointly assessed by CDC and CBC as part of individual SA/SEA.</p>	Chichester District Council, Crawley Borough Council, Environment Agency, Historic England, Natural England
Habitat Regulations Assessment (Nov 2023, AECOM)	<p>Process to understand the impacts of Local Plan on protected environmental sites and to advise on appropriate policy mechanisms to avoid adverse effects.</p>	Natural England
<b>Gypsies and Travellers</b>		
Gypsy and Traveller Accommodation Assessment Report, November 2023	<p>Study undertaken by ORS looking at the future need for G&amp;T provision to 2041. As above, interviews were held with neighbouring authorities to understand individual needs as well as cross boundary issues and contact was made with West Sussex County Council, including to acquire information relating to sites in their ownership.</p>	Adur District Council, Brighton & Hove City Council, Chichester District Council, Crawley Borough Council, Mid Sussex District Council, Mole Valley District Council, Reigate & Banstead Borough Council, South Downs National Park Authority, Waverley Borough Council, Worthing District Council
Statements of Common Ground	<p>The issue of G&amp;T provision is referenced in the multiple Statement of Common Grounds between HDC and other partners. SoCGs will need to be updated to reflect</p>	Various.

Document/Activity	Commentary	Partners
	most recent G&T needs and progress with Local Plans.	

2.5 A number of Statements of Common Ground have been agreed during 2023-2024 covering strategic matters and are listed in the table below.

**Table 3: Local authority Statements of Common Ground**

Document	Date	Partners
<b>Grouping SoCGs</b>		
Northern West Sussex Statement of Common Ground (Update)	July 2023	Crawley Borough Council, Mid Sussex District Council, West Sussex County Council
Northern West Sussex Statement of Common Ground: Housing Need	July 2023	Crawley Borough Council, Mid Sussex District Council
Water Neutrality Statement of Common Ground	July 2023	Chichester District Council, Crawley Borough Council, Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council  (Document also endorsed by Environment Agency, Natural England and Southern Water)
Northern West Sussex Statement of Common Ground (Update)	July 2024	Crawley Borough Council, Mid Sussex District Council, West Sussex County Council
Northern West Sussex Statement of Common Ground: Housing (Update)	July 2024	Crawley Borough Council, Mid Sussex District Council
<b>Bilateral SoCGs</b>		
Horsham/Crawley Statement of Common Ground	July 2023	Crawley Borough Council
Horsham District Council/ Brighton and Hove City Council Statement of Common Ground	June 2024	Brighton & Hove City Council

Document	Date	Partners
Horsham District Council/ Chichester District Council Statement of Common Ground	June 2024	Chichester District Council
Horsham District Council/ Mole Valley District Council Statement of Common Ground	June 2024	Mole Valley District Council
Horsham District Council/ National Highways Statement of Common Ground	June 2024	National Highways
Adur and Worthing Councils/ Horsham District Council Statement of Common Ground	July 2024	Adur District Council, Worthing Borough Council
Horsham/ Arun District Council Statement of Common Ground	July 2024	Arun District Council
Horsham/Crawley Statement of Common Ground	July 2024	Crawley Borough Council
Horsham District Council/ Environment Agency Position Statement	July 2024	Environment Agency
Horsham/Surrey County Council Statement of Common Ground	July 2024	Surrey County Council
Horsham/Natural England Statement of Common Ground	July 2024	Natural England
Horsham/West Sussex County Council Ground	July 2024	West Sussex County Council
Horsham/Mid Sussex Statement of Common Ground	August 2024	Mid Sussex District Council
Horsham/Waverley Borough Council Statement of Common Ground	October 2024	Waverley Borough Council

2.6 Though most correspondence with partners are via email, meetings were held with numerous partners during 2023-2024. Those meetings held prior to submission of the Local Plan (July 2025) are listed below.

**Table 4: Duty to cooperate meetings**

Authority/Organisation	Meetings (April '23- July '24)	Commentary/Outcomes
<b>Groupings</b>		
Northern West Sussex Authorities	Officer level meeting scheduled every 8 weeks	Authorities have produced SoCGs, including to identify a shared approach to addressing housing needs across the strategic housing market area. The most recent SoCGs were published in July 2024.
Sussex North Water Resource Zone Authorities	Chief Exec Board meet every 6-8 weeks Lead Officer Group meet monthly DM and Policy Groups meet monthly Offsetting Implementation Group meet twice a month	Authorities have procured a joint evidence base, set up an agreed governance structure, jointly (and successfully) bid for funding and the work is guided by a joint Water Neutrality Project Manager. A SoCG (July 2023) has been produced that has been agreed by LPAs and endorsed by other bodies and sets out a commitment to continued joint work. A joint Topic Paper (July 2023) has been produced that details the shared work undertaken with an update produced in July 2024.  The LPAs have agreed a joint model policy to be included in Local Plans and are seeking to deliver an offsetting scheme (SNOWS) to enable development to come forward.
Gatwick Diamond	Meetings scheduled quarterly	Officers from Gatwick Diamond authorities meet to discuss progress on respective Local Plans and cross-boundary strategic matters. Outcomes are reflected in SoCGs for overlapping groupings (in particular, Northern West Sussex) and in bilateral SoCGs.
West Sussex and Greater Brighton	13.12.23	Meetings used to share information regarding Local Plan making and discuss key strategic issues affecting sub-region.  Commissioned joint work – e.g. Housing Market Geographies (GL Hearn, 2016) and Defining the HMA and FEMA (GL Hearn, 2017) and authorities committed to joint working across sub-region. Production of SoCG ongoing to cover key planning issues, including housing and economic growth.  Water neutrality has been the focus for many authorities in the grouping (see above).
<b>Neighbouring Local Planning Authorities/ County Councils</b>		
Adur DC	07.09.23	Adur & Worthing Councils now have a shared

Authority/Organisation	Meetings (April '23- July '24)	Commentary/Outcomes
		planning service. See Worthing BC, below.
Arun DC	28.09.23	Production of initial SoCG (November 2021), agreements made in relation to housing, G&T and employment. Updated SoCG signed in July 2024.
Brighton & Hove CC	12.09.23, 09.05.24	Production of initial SoCG (December 2021), covering housing, G&T and employment. Updated SoCG signed in June 2024.
Chichester DC	12.09.23	SoCG produced and finalised in June 2024 and notes agreement on housing need, water neutrality, gypsy and traveller provision, infrastructure and air quality.
Crawley BC	<p>Officer level meeting scheduled every 3 weeks</p> <p>Senior Officer level meeting scheduled every 6 weeks.</p> <p>21.09.23 Meeting with Cabinet members and Lead officers</p>	Production of initial SoCG (July 2023) reflecting matters discussed at bilateral meetings. SoCG covers, housing need, G&T, employment, settlement hierarchy, strategic growth West of Crawley, Gatwick Airport and education. Update signed in July 2024.
Mid Sussex DC	30.08.23	<p>Production of SoCG ongoing. Latest meeting discussed progress of respective Local Plans. Meet regularly in other for a – such as NWS and Water Neutrality Groupings.</p> <p>HDC request for assistance for unmet housing and G&amp;T needs sent 24.11.23. Made clear in response to HDLP that cannot meet G&amp;T needs. The NWS SoCGs covers approach to meeting housing needs. MSDC are assisting with regards to unmet needs across NWS but not able to do so in full.</p>
Mole Valley DC	31.08.23	Production of SoCG (June 2021), covering housing, Gatwick Airport, transport and strategic development west of Crawley. Updated SoCG finalised in June 2024.
South Downs National Park Authority	27.09.23	Production of SoCG (November 2021), covering cross-boundary development needs, sites within the SDNPA's setting and the Shoreham Cement

Authority/Organisation	Meetings (April '23- July '24)	Commentary/Outcomes
		<p>Works site.</p> <p>HDC request for assistance for unmet housing and G&amp;T needs sent 24.11.23. Response received – likely to be unable to assist.</p>
Surrey County Council	23.04.24, 03.06.24	Production of SoCG (July 2024), covering cross-boundary issues, primarily to reflect transport impacts arising from HDLP.
Waverley BC	12.09.23	Production of SoCG (October 2024), agreements made in relation to housing, G&T, employment and transport and infrastructure. An updated SoCG to reflect the latest position is in the process of being finalised.
West Sussex County Council	Numerous meetings held between authorities at all levels.	<p>Ongoing discussions with WSCC all to share information relevant to Local Plan preparation. A SoCG was published in July 2024.</p> <p>As an infrastructure and service provider, WSCC have been a key organisation in the development of the Infrastructure Delivery Plan (IDP), have been a key partner in the Horsham Transport Study, and have been involved in joint work with other groupings. Outcomes to date are reflected in relevant SoCGs and reports relating to those.</p>
Worthing BC	07.09.23	<p>Production of SoCG (November 2021), referenced housing, G&amp;T, employment and wildlife sites. A shared SoCG for Adur &amp; Worthing was agreed in July 2024 that provided contextual information and focused upon housing need and gypsy and traveller accommodation.</p> <p>WBC had submitted request for unmet needs, which was under considered when it appeared HDC could accommodate wider needs – WBC have subsequently adopted its Local Plan</p>
<b>Statutory Bodies</b>		
Environment Agency	25.04.24	<p>Meetings and correspondence to show how comments have been addressed in emerging Local Plan. Bilateral work largely overtaken by work on water neutrality, to which Environment Agency is a key partner given its responsibilities. Shared scope of SA/SEA.</p> <p>Have signed a Position Statement which relates to flood risk and policies connected with the EA's responsibilities, showing how their Regulation 19 comments have been addressed.</p>

Authority/Organisation	Meetings (April '23- July '24)	Commentary/Outcomes
Historic England	Correspondence by email	Correspondence showing how comments have been taken into account for preparation of Local Plan. Shared scope of SA/SEA. Sharing of heritage assessment for informal review.
Natural England	25.01.24, 21.02.24, 14.05.24, 22.05.24, 06.06.24	<p>Meetings and correspondence to show how comments had been addressed in emerging Local Plan.</p> <p>Have worked jointly with regards to HRA and shared scope of SA/SEA. Bilateral with respect to water neutrality has largely been overtaken through other groupings, in which Natural England is a key partner as the organisation which identified the issue. Other issues include working with on-site issues at West of Ifield (Bechstein Bats) and the air quality/ammonia issue (The Mens). Statement of Common Ground signed in July 2024 relating to such issues.</p>
National Highways	11.10.23, 14.12.23, 23.12.24, 19.02.24, 23.04.24	<p>Cooperation in relation to the Horsham Transport Study and IDP.</p> <p>Statement of Common Ground signed in June 2024 relating to transport modelling, impacts on the strategic road network and mitigation.</p>

2.7 The Council has worked with partner organisations on strategic matters not directly related to the preparation of the Local Plan and the Duty to Cooperate. This includes those listed in the table below.

**Table 5: Other examples of cross-boundary cooperation**

Document	Date	Partners
<b>Gatwick Airport Northern Runway Project (NRP)</b>		
Joint Adequacy of Consultation Statement	July 2023	Crawley Mid-Sussex Reigate & Banstead, Mole Valley, Tandridge and Horsham Councils
Joint West Sussex Local Impact Report	March 2024	

Statement of Common Ground	March 2024	
<b>High Weald National Landscape</b>		
High Weald AONB Management Plan 2024-2029	Adopted June 2024	High Weald AONB Partnership Local Authorities
<b>Water Resource Management Plan</b>		
Joint Response to Southern Water's Water Resources Management Plan (WRMP)	December 2024	Chichester District Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, West Sussex County Council, South Downs National Park Authority