



Horsham District Council / Brighton and Hove City Council Statement of Common Ground Part B

Horsham District Local Plan 2023-2040: Submission Version

Signatories:

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07/06/2024

Statement

1. Introduction and Scope

- 1.1 This statement supplements the Statement of Common Ground Part A which forms the first part of this document. The purpose of this statement is to document the strategic cross-boundary matters 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 The matters dealt with in this statement are:
 - Section 2: Housing need
 - Section 3: Gypsy and Traveller Accommodation
 - Section 4: Employment
- 1.3 This statement has been produced in preparation for the submission of the Horsham District Local Plan 2023-2040 for examination and may be updated should circumstances change.
- 1.4 Both signatories to this statement reserve the right to withdraw its endorsement to this statement at any time. If this situation arises, formal withdrawal from the agreement should be set out in a formal written notification to the other signatories to this statement.

2. Housing need

Local housing need

- 2.1 The starting point for Local Plans is the standard housing methodology which, at the time of writing, identifies housing needs of 917 homes per year for Horsham District Council (HDC) and 2,319 homes per year for Brighton and Hove City Council (BHCC). These figures exceed housing targets contained within the respective adopted Local Plans, as the Horsham District Planning Framework 2015 (HDPF) sought to deliver 800 homes per year over its plan period, with the City Plan Part One 2016 making provision for a minimum 660 homes per year.
- 2.2 HDC and BHCC are at different stages in the preparation of Local Plans. HDC is due to submit its Local Plan (expected July 2024), which reviews and will replace the HDPF. Historically, HDC has met its housing needs and assisted with meeting unmet needs across a wider area. However, HDC is currently unable to demonstrate that it is able to meet its own needs. This is largely related to the impact of Natural England's Position Statement relating to development within the Sussex North Water Supply Zone¹, which has limited the delivery of new homes in Horsham District since September 2021. HDC has sought assistance from other authorities, including BHCC, in this matter but no other authority has indicated that they can assist.
- 2.3 BHCC is at the early stages of preparing a new City Plan with a consultation scoping key issues scheduled for the Autumn of 2024. BHCC has significant unmet housing needs measured against the standard method, a situation compounded by its inclusion in the government's December 2020 amendment to the revised standard method that applies a 35% uplift to the housing need figures for the top 20 most populated cities and urban centres. Although the BHCC City Plan review is at an early stage of development, Brighton & Hove is subject to major physical and environmental constraints that limit the potential for needs to be met and may seek assistance from other authorities should needs be unable to be met as it has done for the preparation of previous Plans.

Wider Housing Needs

- 2.4 The parties note that Horsham District primarily lies within the Northern West Sussex Housing Market Area (HMA), whilst Brighton & Hove and a small part of the south of Horsham District lie within the Sussex Coast HMA. Both parties recognise that there are significant unmet needs in both HMAs.
- 2.5 Both authorities are members of the West Sussex and Greater Brighton Strategic Planning Board. Both authorities are committed to proactive participation in the West Sussex and Greater Brighton partnership and/or directly with other member authorities, towards addressing sub-regional unmet housing needs within this area.

¹ https://www.horsham.gov.uk/_data/assets/pdf_file/0019/106552/Natural-Englands-Position-Statement-for-Applications-within-the-Sussex-North-Water-Supply-Zone-September-2021.pdf

2.6 HDC is a signatory to a Northern West Sussex HMA Statement of Common Ground relating to housing need², within which prioritisation of meeting unmet needs beyond local authority boundaries is discussed. It is thus HDC's position that should it be able to fully meet its own needs and assist with meeting unmet needs of other authorities, assistance would be prioritised to other HMAs as follows:

1. Northern West Sussex HMA
2. Coastal West Sussex HMA
3. Other adjacent and nearby HMAs

2.7 BHCC note the position of HDC but does not agree with the prioritisation set out above. BHCC's view is that, given the scale of unmet housing need in the Coastal West Sussex HMA and those of Brighton & Hove in particular, options to explore meeting unmet need within the Coastal West Sussex HMA should not be secondary or contingent upon the consideration and/or resolution of unmet housing needs elsewhere.

3. Gypsy and Traveller Accommodation

3.1 HDC were signatories to a SoCG between BHCC and other authorities in relation to Gypsies and Travellers in Autumn 2019. Since that time, HDC has undertaken two Gypsy and Traveller Accommodation Assessments (GTAA), the most recent of which was published in November 2023. Though the emerging HDC Local Plan has sought to maximise provision of pitches, against the most recent GTAA there is still a shortfall of pitches over the plan period. HDC have approached neighbouring authorities to request assistance in meeting unmet needs, but no authority identify that they can assist.

3.2 There are unmet needs within the South Downs National Park Authority (SDNPA) area falling within the administrative boundaries of Brighton and Hove City Council. BHCC undertook a joint search with the SDNPA in 2022 with a view to allocating additional sites in City Plan Part Two. However, the work was not able to identify any suitable and additional sites. Given this, BHCC is also not in a position to accommodate any unmet need for pitches arising from Horsham District.

3.3 BHCC has recently commissioned an updated GTAA jointly with the SDNPA and Adur/Worthing which will be completed in Summer 2024. The parties note that there are unmet needs for Gypsy and Traveller provision and agree to continued dialogue on this issue to examine opportunities for addressing unmet needs in the future.

4. Employment Uses

4.1 The parties note and agree that HDC does not seek its employment needs to be met within other local authorities as the emerging HDC Local Plan seeks to meet the needs arising in Horsham District in full. BHCC note that strategic employment sites identified and safeguarded through the

² https://www.horsham.gov.uk/_data/assets/pdf_file/0015/132216/NWS-Housing-Need-SoCG-Signed-24.7.23.pdf



Horsham District Local Plan may offer the opportunity to make a positive contribution to the sustainable economic development of the wider sub-region.

- 4.2 BHCC has recently completed an updated Employment Land Study, to inform the review of the City Plan. The Study identifies significant additional requirements for both office and industrial floorspace in the city over the period to 2041. As part of the City Plan review, BHCC will be reviewing existing and potential employment sites and floorspace, however the additional requirements are unlikely to be fully accommodated within the city given constrained land availability.
- 4.3 The parties agree, as identified in Part A of this Statement of Common Ground, to continue to work proactively and collectively as part of wider groupings in relation to economic matters.

5. Closing matters and further work

- 5.1 The parties have demonstrated in Parts A and B of this statement that they have worked jointly and constructively on relevant 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.

Horsham Duty to Cooperate: Statement of Common Ground Part A

Horsham District Local Plan 2038: Regulation 19

Date of issue: January 2022

1. Introduction, Scope and list of parties involved

1.1 This statement sets out the context of Duty to Cooperate¹ activities at a sub-regional level involving Horsham District Council (HDC). In particular, it explains these key sub-regional joint activities:

- i. The joint working activities of the North West Sussex Housing Market Area (NWS-HMA)
- ii. The work being progressed by the West Sussex and Greater Brighton Strategic Planning Board to agree a joint Local Strategic Statement 3 (LSS3)
- iii. The joint working activities of the Gatwick Diamond Growth Area.

1.2 The parties to this Statement of Common Ground Part A are:

Local Planning Authorities:

- Arun District Council
- Brighton & Hove City Council
- South Downs National Park Authority
- Waverley Borough Council

¹ The Duty to Cooperate in plan-making terms is defined in the NPPF paragraphs 24-27 and further explained in national Planning Practice Guidance (PPG) in the section 'Plan-making', subsection 'Maintaining Effective Cooperation'. PPG also sets out guidance on preparing a Statement of Common Ground.

1.3 This Part A statement has been prepared alongside preparation of the Horsham District Local Plan for the period to 2038, and is supplemented with a series of Part B statements which set out specific cross-boundary issues more appropriately dealt with on a bi-lateral or tri-lateral basis. Part A and the relevant Part B should be read in conjunction.

2. Signatories

2.1 See Parts B for the respective signatories to this statement.

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3. Strategic Geography

3.1 Horsham District is located in West Sussex, within the South East of England. The district covers an area of 530km² (205 square miles) and is predominantly rural in character, containing a number of smaller villages and towns. The largest urban area is the market town of Horsham, situated in the north-east of the District.

3.2 95km² (36.49 square miles) of the District falls within the South Downs National Park. Although Horsham District Council is not the local planning authority for this area, this nationally protected landscape provides an important landscape context for locations across the district. Section 62 of the Environment Act 1995 requires all relevant authorities, including Horsham District Council, to have regard to the purposes of the National Park as follows:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
- To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

3.3 The District lies within the area covered by the Coast to Capital Local Enterprise Partnership. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area. The area boasts a strong economy worth £50.7 billion gross value added (GVA), making it the seventh largest local economy in England.

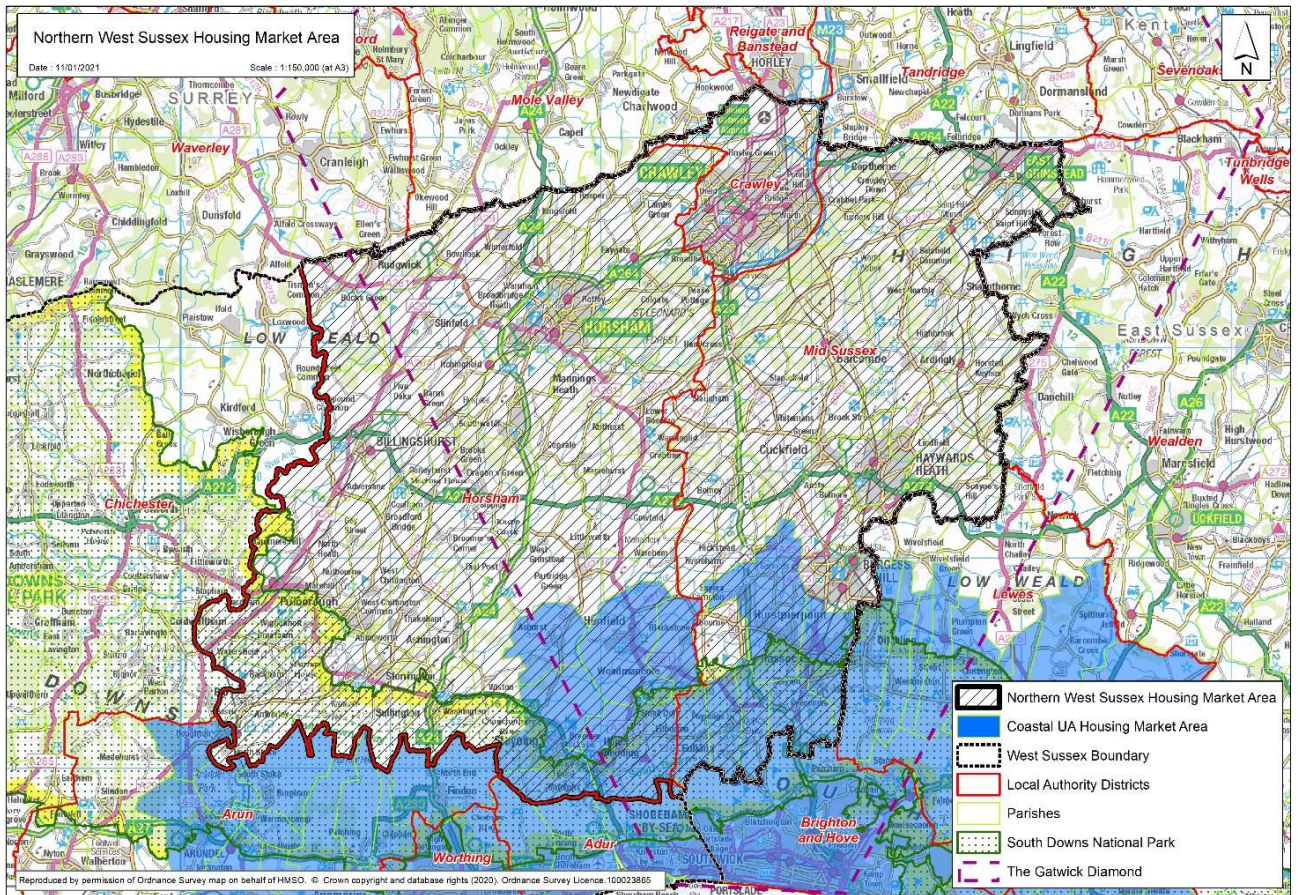
3.4 The majority of Horsham District is also located within the Gatwick Diamond economic area. This extends from Croydon in the north, around Gatwick Airport and down the A23 corridor to the south coast.

3.5 The whole of the District also falls within the North West Sussex Housing Market Area (NWS-HMA), together with Crawley Borough Council and Mid Sussex District Council.

3.6 A modest southern portion of the District also falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). Whilst this identified HMA only includes a small part of Horsham district, it nevertheless has significant implications on future cross-boundary planning. This is because many of the local planning authority areas within the CWS-HMA are tightly

constrained built-up areas, meaning that not all development needs identified within those areas can be met within their administrative boundaries.

Figure 1: Key spatial parameters for Duty to Cooperate activities



4. Strategic matters and how these are being addressed at the sub-regional level

4.1 Strategic matters relevant to the wider area are wide-ranging. The key matters are:

- i. Employment and economic strategy
- ii. Housing need
- iii. Strategic infrastructure
- iv. Green infrastructure and biodiversity

4.2 There is significant crossover between these matters, and various mechanisms for addressing them. As such, the following paragraphs outline the main mechanisms and ongoing activities that seek to address cross-boundary strategic issues, together with the lead organisations who are active partners within them.

4.3 All parties agree that a further key matter is addressing climate change, and in particular decarbonising our communities. This is a cross-cutting theme that runs through other key matters, and will also be picked up in more detail through existing joint work and groupings including those set out below.

A. Northern West Sussex Housing Market Area (NWS-HMA)

4.4 The lead partners in the NWS-HMA are:

- Horsham District Council (HDC)
- Mid Sussex District Council (MSDC)
- Crawley Borough Council (CBC)
- West Sussex County Council (WSSCC)

4.5 These Councils 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 ‘Coast to Capital’ Local Enterprise Partnership, which 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.

4.6 The key activities and outputs from this grouping covering the NWS area are as follows:

- a. The *Economic Growth Assessment (EGA)* provides a common evidence base which quantifies the strategic need for the area as a whole and each authority area within it. It also provides an expert steer as to the types of employment growth that will meet the shared economic objectives of the area, and relates this to spatial dynamics including transport and infrastructure networks. It was initially started in 2009. There have been various updates the latest being in January 2020.
- b. The *Strategic Housing Market Assessment (SHMA)* provides a common evidence base on the levels and types of housing need within the HMA. It uses the current Government guidance to calculating overall ‘local housing need’ using the standard methodology for the respective authority areas. It also estimates the quantum and types of need for particular dwelling sizes, affordable housing, older persons housing, and housing for those with disabilities. The latest SHMA is dated November 2019.
- c. A *Gatwick Sub-Region Water Cycle Study (WCS)* provides a common evidence base the potential issues relating to future development within the Gatwick Sub-Region and the impacts on water supply, wastewater collection and treatment and water quality. As well as covering the NWS area, it additionally covers Reigate and Banstead Borough to the north of Crawley. The latest WCS is dated August 2020.

A supplement to the Water Cycle Study, to deal specifically with water neutrality and impacts on the Arun Valley SAC/SPA, has recently been commissioned. A brief for this has been jointly agreed by HDC, CBC and Chichester District Council.

4.7 The authorities share methodologies and emerging evidence to ensure consistency and compatibility throughout the area, even if studies are being produced separately. These include: Strategic Housing Land Availability Assessments, transport modelling to support plan-making, and Gypsy and Traveller Accommodation Needs Assessments. The activities of the NWS group of authorities is documented in more detail in the Northern West Sussex Statement of Common Ground dated May 2020.

4.8 Details of how unmet development needs are being addressed in the NWS-HMA are set out in the relevant Part B sections of this statement.

B. West Sussex and Greater Brighton Strategic Planning Board

4.9 The West Sussex and Greater Brighton Strategic Planning Board (WS&GB) consists of the following partners:

- Adur District Council
- Arun District Council
- Brighton & Hove City Council
- Chichester District Council
- Crawley Borough Council
- Horsham District Council
- Lewes District Council
- Mid Sussex District Council
- Worthing Borough Council
- South Downs National Park Authority
- West Sussex County Council

4.10 WS&GB consist of lead Council Members, supported by senior officers. Its remit is to:

- a. Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
- b. Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.

4.11 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015, and is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. These priorities reflect the local planning authorities' clear aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for local plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.

4.12 Despite having LSS2 in place, all partners have recognised that a full review of LSS2 will be required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly address the continuing gap between objectively assessed housing needs and housing delivery in the sub-region and the continuing challenges around supporting sustainable economic growth and infrastructure investment. To inform the preparation of LSS3 the following joint study has been completed:

Defining the HMA and FEMA (GL Hearne, 2017) provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. The boundaries of these respective areas are shown in **Figure 1**. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.

4.13 An updated Statement of Common Ground is being prepared. This is likely to document the extent of unmet housing need to reflect a commonly agreed position. All WS&GB partners have committed to undertaking the following:

- a. Robustly and creatively explore options for meeting the unmet needs across the Board area, starting by leaving 'no stone unturned' within the respective administrative boundary for the period up to 2030 and for these options to inform local plan reviews;
- b. Prepare a Local Strategic Statement 3 covering the period 2030 to 2050 with an appropriate level of stakeholder participation to ensure that all those with an interest in LSS3 have an opportunity to engage in the development of the strategy;
- c. Commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following:
 - A baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;
 - A common methodology for determining the 'no stone unturned' approach to identifying possible locations to meet any unmet need;
 - The capacity of the Board area to absorb further growth in this period;
 - The likely required level of growth between 2030 and 2050;
 - The strategic options available to deliver additional growth;
 - The investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.

C. Gatwick Diamond authorities

4.14 The Gatwick Diamond is a diamond-shaped area, with Gatwick Airport at its heart, running between London and Brighton, and extending to Horsham in the west and East Grinstead to the east. As the world's busiest single runway airport, Gatwick Airport has a significant impact on the economy and prosperity of the authorities within the Diamond.

4.15 The Gatwick Diamond (GD) Authorities is a partnership of local authorities working together to coordinate on strategic planning and development issues affecting the Gatwick Diamond. The GD authorities are:

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|-----------------------------------|--|
| • Surrey County Council | • Mid Sussex District Council |
| • West Sussex County Council | • Mole Valley District Council |
| • Crawley Borough Council | • Reigate and Banstead Borough Council |
| • Epsom and Ewell Borough Council | • Tandridge District Council |
| • Horsham District Council | |

4.16 The GD authorities have recognised the need to coordinate on strategic planning issues, in order to promote the continued prosperity of the Gatwick Diamond and plan for its future growth. They have worked on and signed up to a Gatwick Diamond Memorandum of Understanding (published March 2012) which was accompanied by a Gatwick Diamond Local Strategic Statement (GD-LSS). The GD-LSS was reviewed and updated in 2016.

4.17 The GD-LSS continues to form the basis for inter-authority cooperation on strategic issues relevant to this area, identifying priority themes for joint working, so that decisions made through the plan making processes are fully informed.

D. Coordination of green infrastructure and natural capital assets

4.18 There is common recognition amongst public bodies in the West Sussex and Surrey areas and wider that successful enhancement of natural capital requires a cross-boundary approach. The following joint working mechanisms are used across the sub-region to achieve this coordination:

- a. *Sussex Local Nature Partnership (LNP)*: This group was formed in 2014 and brings together around 25 organisations in Sussex. Its objectives are to conserve, enhance and expand Sussex's Natural Capital, and ensure that Sussex residents share in the benefits provided by healthy, well-functioning ecosystems. West Sussex County Council is a partner. In December 2019, the Sussex LNP published a Natural Capital Investment Strategy for Sussex. HDC will have regard to this strategy (and future updates) within its strategy, with particular regard to its reference to: *"The LNP investment strategy provides the strategic and spatial information needed to properly inform local decisions that influence natural capital assets."*
- b. *Wilder Horsham (WH)*: WH is a five-year partnership between Sussex Wildlife Trust (SWT) and HDC, which was formally agreed by HDC Cabinet on 28 November 2019². It will link with the work of the Sussex Local Nature Partnership, recognising that the Natural Capital Investment Strategy for Sussex provides a shared framework for nature's recovery in Sussex. Agreed actions under 'Organisational resilience' include to *"draw on the expertise of the Sussex Wildlife Trust to make further improvements and enhance the presence of the Trust throughout the District"* and to work with SWT to *"embed the principles of the Wilder Horsham District programme into all parts of the organisation... For example, the Trust will run training events for staff and help the council develop policies on biodiversity as part of the review of the Local Plan, as well as reviewing the existing Green Infrastructure Strategy (2014)."*

4.19 Further details on the outcomes of joint working on green infrastructure and natural capital may be provided in separate bilateral statements as appropriate.

5. Housing need, supply and distribution

5.1 The relationship between housing need and its supply and distribution within relevant HMAs is complex. This is being considered in light of recent confirmation of how 'local housing need' for districts, boroughs and unitary authorities should be calculated, and will be addressed both through respective local plan processes, and through ongoing strategic groupings as described above. This section of this statement will be updated when these matters have been clarified.

² The Report to Cabinet and minutes of meeting can be found at <https://horsham.moderngov.co.uk/ieListDocuments.aspx?Cid=132&Mid=1486&Ver=4>

6. Closing matters and further work

- 6.1 This statement demonstrates that there is a shared commitment between local authority partners in the subregion to work jointly and constructively on relevant cross-boundary matters at a sub-regional level. 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.
- 6.2 Part B of this statement sets out specific cross-boundary issues more appropriately dealt with on a bi-lateral or tri-lateral basis.
- 6.3 At the time of preparation, the international community is experiencing a worldwide pandemic of Coronavirus (Covid-19). This situation is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in parts A and B of this statement, for example due to likely (yet unknown) impacts on the economy at all levels, and on the housing market.
- 6.4 Also at the time of preparation, the UK Government is consulting on radical and fundamental changes to the English planning system. However transition arrangements are proposed which would allow local plans at an advance state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the Horsham District Local Plan should continue to be prepared in accordance with current legislation and guidance, including using existing practice guidance on calculating the standard methodology local housing need as published on 16 December 2020 (Planning Practice Guidance paragraph: 006 Reference ID: 2a-004-20201216).