

Northern West Sussex Housing Market Area

Statement of Common Ground: Housing Need

July 2023

1. Introduction

This Statement of Common Ground has been prepared by the Northern West Sussex Housing Market Area authorities, comprising:

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



Figure 1: Map of Northern West Sussex Authorities

The Northern West Sussex (NWS) Authorities have a long history of joint working and co-operation on strategic cross-boundary matters. The full extent of this is captured within the Northern West Sussex Statement of Common Ground (NWS SoCG)¹. This was last agreed in 2023 by the above authorities and is kept up to date to support the authorities respective emerging Local Plans. The NWS SoCG also includes West Sussex County Council (all three lower tier authorities are situated within West Sussex County) for cross-boundary matters which fall under their responsibility, particularly transport.

¹ https://www.horsham.gov.uk/__data/assets/pdf_file/0011/86546/Northern-West-Sussex-Statement-of-Common-Ground-May-2020.pdf

Given the particular circumstances regarding housing need and supply impacting this Housing Market Area (HMA), this Statement of Common Ground details the co-operation between the NWS authorities that has actively taken place in seeking to resolve housing matters.

This Housing Statement of Common Ground should be read in conjunction with the NWS SoCG and updates it with respect to housing issues.

It documents the findings of the authorities' respective evidence base (including findings of jointly commissioned evidence studies) and agreed positions of the respective authorities on the following matters:

- Strategic Geography: Definition of the Housing Market Area
- Housing Need: Prioritisation
- Housing Need: Current Position
- Assessment of Housing Supply Options: Site Selection
- Ongoing Co-Operation and Governance

2. Strategic Geography: Definition of the Housing Market Area

The definition of the Northern West Sussex Housing Market Area (NWS HMA) is long-standing and has been subject to ongoing review through the authorities' respective evidence bases, including joint studies, and has been confirmed at respective Local Plan examinations.

Housing Market Area Boundary

The three authorities agree the below Housing Market Area boundaries for the purposes of plan-making, as supported by the evidence base.

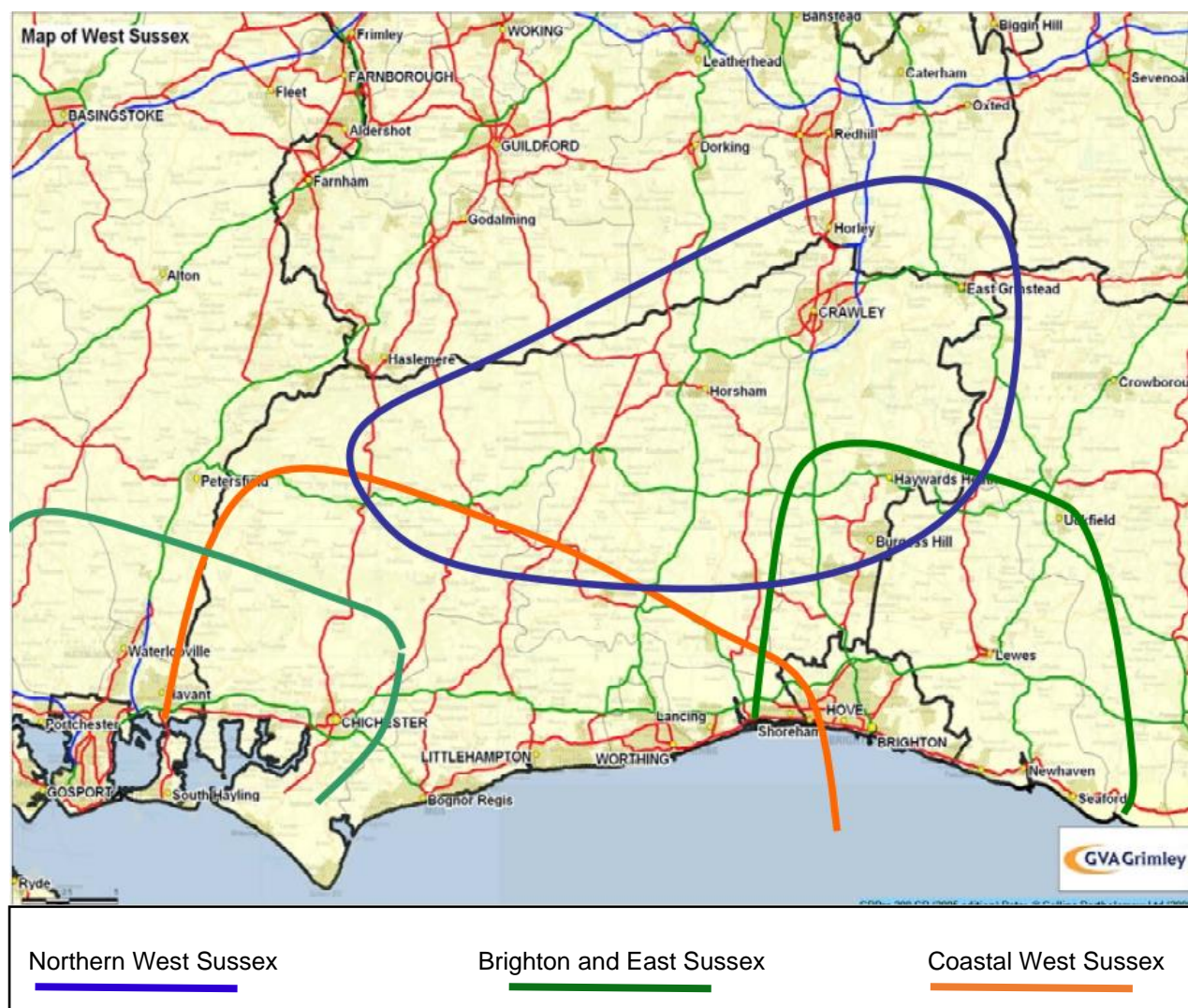


Figure 2: Sussex Housing Market Areas

Evidence Base

The definition of the NWS HMA has been established in the following evidence base studies:

- **West Sussex Strategic Housing Market Assessment (GVA 2009)**
This initial Strategic Housing Market Assessment (SHMA) established the Northern West Sussex HMA (NWS HMA) centred on Crawley and Horsham, extending south to Haywards Heath and Burgess Hill, east to East Grinstead, north to Horley and west/southwest to Billingshurst and Pulborough). It identified a 'best-fit' to local authority boundaries as comprising Crawley, Horsham and Mid Sussex. It recognised that there are some overlaps with the Brighton and East Sussex and Coastal HMAs in the

southern parts of Horsham and Mid Sussex. However, the NWS SHMA is the predominant one.

- **Northern West Sussex – Affordable Housing Needs Model Update (Chilmark, 2014)**

This reviewed the conclusions of the GVA 2009 study. It concluded that the NWS HMA continued to represent the primary HMA for Crawley, Horsham and Mid Sussex and that this should form the basis for Local Plans.

- **Housing Market Geographies – Greater Brighton and Coastal West Sussex Strategic Planning Board (GL Hearn, 2016)**

This report was commissioned by the Greater Brighton and Coastal West Sussex authorities (comprising Adur, Arun, Brighton & Hove, Chichester, Crawley, Horsham, Mid Sussex, Worthing and the South Downs National Park Authority) in 2016 to support ongoing work on its Local Strategic Statement. The report confirmed strong links between Horsham, Crawley and Mid Sussex – thereby endorsing the findings of previous studies. It too recognised overlaps in the Horsham and Mid Sussex areas with the Brighton and Coastal HMA.

- **Northern West Sussex SHMA – Crawley and Horsham Update (Iceni, 2019)**

To support Local Plan Reviews, Crawley and Horsham (with input from and engagement with Mid Sussex) commissioned an updated SHMA to review HMA boundaries. It re-confirmed the established position set out in previous studies.

- **Northern West Sussex SHMA – Mid Sussex Update (Iceni, 2021)**

The Mid Sussex SHMA update was completed by the same consultants as the Crawley and Horsham Update and uses the same methodology. Therefore, there is a consistent approach to assessing housing need within the HMA. The Mid Sussex Update endorses the findings of the Crawley and Horsham Update and the conclusion that a Northern West Sussex HMA remains appropriate.

Local Plan Findings

The three NWS HMA authorities current adopted Local Plans are as follows:

- **Crawley:** Crawley 2030 (2015 – 2030), adopted December 2015
- **Horsham:** Horsham District Planning Framework (2011 – 2031), adopted November 2015
- **Mid Sussex:** District Plan (2014 – 2031), adopted March 2018

The three respective Inspectors examining the above Local Plans have supported the principle of the Northern West Sussex HMA being the primary HMA for each of the three authorities. Despite evidence of overlaps, the Inspectors (in particular, those for Horsham and Mid Sussex) concluded that meeting housing need arising within the Northern West Sussex HMA should be a priority ahead of other overlapping areas.

Conclusions

The NWS HMA was first established in 2009, comprising Crawley, Horsham and Mid Sussex authority areas. The evidence has been updated on numerous occasions since and reaches the same conclusion – whilst there are overlaps with other HMAs, the predominant HMA for all three authorities is Northern West Sussex. This position has been tested at examination and endorsed by three independent Planning Inspectors.

As all three authorities are progressing with reviews of their Local Plans, the evidence related to HMA boundaries has been recently revisited. However, the same conclusions are drawn.

Strategic Geography: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree that:

- The evidence regarding Housing Market Area boundaries is robust and fit-for-purpose.
- The latest studies (Crawley and Horsham, 2019 and Mid Sussex 2021) are consistent with each other, and the conclusions are sound.
- The primary Housing Market Area for the three authorities is the Northern West Sussex HMA.
- There are overlaps with the Coast in the southern parts of Horsham and Mid Sussex districts, and with areas in Surrey lying to the south of the M25. However, the evidence points to the NWS HMA being the primary HMA for planning purposes, including the consideration of cross-authority unmet need.

3. Housing Need: Prioritisation

Section 2 presented findings that the Northern West Sussex HMA is the predominant HMA, with some overlaps with the Coastal HMA to the south. The NWS HMA authorities agree that this provides a priority order for the purposes of addressing housing need through local plans.

The authorities agree that it is appropriate to establish a priority order, given:

- Firstly, the extent of objectively assessed housing need arising in each individual authority area;
- Secondly, the specific and evidenced circumstances (e.g. environmental and infrastructure constraints) which could limit housing growth;
- Thirdly, the extent to which each authority can meet its own need and any clearly evidenced residual unmet need arising, given the constraints;
- Fourthly, the opportunities to contribute towards unmet need arising in functionally related areas outside the individual authority area.

A priority order has been established. This recognises the fact that contributions towards meeting unmet need arising are likely to be limited and therefore any such contributions towards unmet need should be directed to those most logically and evidentially linked in the first instance.

The authorities agree with the priority order in the text box below as a principle. However, it is recognised that:

- This has been established based on the evidenced HMA boundaries as described in Section 2, rather than with reference to specific sites and their impacts.
- The allocation of specific sites on or very close to non-NWS HMA local authority boundaries may justify an alternative approach to the priority order, however this should be the exception (and justified by evidence) rather than the rule.

For instance, through the site selection process an authority may wish to allocate development within their area on/very close to their administrative boundary. Where there is supply above meeting the host authority's needs, this would most logically (and in sustainability terms) assist firstly with housing need arising the other side of that border. It is therefore recognised by the authorities that, in some cases, this may mean deviating from the established priority order.

Housing Need Prioritisation: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree that, subject to meeting individual housing needs and establishing that there is potential to assist other authorities with unmet need, assistance should be prioritised as follows:

- **Priority 1: Northern West Sussex HMA.**
- **Priority 2: Coastal West Sussex HMA.**
- **Priority 3: Other adjacent and nearby HMAs where it is justified by each individual authority.**
 - e.g. Surrey authorities (CBC and HDC), East Sussex authorities (MSDC) and, following those, London (all).

It is for each authority to set out how it can meet its own needs and any other authority's needs (or otherwise) through evidence produced through the preparation of their respective local plans.

It is recognised that there may be reason to deviate from the priority order during the process of assessing the most suitable sites for allocation. Deviation from the above priority order will need to be justified by evidence and any implications discussed and considered jointly with the NWS HMA authorities.

4. Housing Need: Current Position (March 2023)

Northern West Sussex HMA – Current Adopted Plans

The current suite of Northern West Sussex HMA Local Plans were adopted as follows:

- **Crawley:** Crawley 2030 (2015 – 2030), adopted December 2015
- **Horsham:** Horsham District Planning Framework (2011 – 2031), adopted November 2015
- **Mid Sussex:** District Plan (2014 – 2031), adopted March 2018

Crawley’s unmet need position was established during its examination. Horsham identified the potential to contribute 150dpa towards this unmet need and this was agreed during the examination of the Horsham District Planning Framework. During the Mid Sussex examination, the Inspector concluded that Mid Sussex could contribute 1,498 dwellings towards unmet need arising in Crawley. Whilst this would leave a remaining 35dpa, the Inspector concluded that this was likely to be met as Crawley’s housing delivery was running slightly ahead of trajectory at that point in time.

Therefore, the NWS HMA authorities have historically been able to demonstrate that the need arising in the HMA could be met in full – based on the agreed Objectively Assessed Needs establishing within each authority’s respective examination. This reflects their positive and on-going engagement to seek cross-boundary strategic solutions.

Table 1: Housing need and supply position at time of Mid Sussex District Plan adoption (March 2018)

	Objectively Assessed Need (OAN)	Total Plan Period OAN	Total Plan Period Housing Supply	Contribution towards NWSHMA (to 2031)
Crawley	675	10,125	5,100	-5,025 (335dpa)
Horsham	650	13,000	16,000	3,000 (150dpa)
Mid Sussex	876	14,892	16,390	1,498 (88dpa)
TOTAL	2,201	38,017	37,490	-527 (35dpa)

Standard Method

Since the three Local Plans were adopted, the Government has introduced the Standard Method for assessing local housing need.

It is important to recognise that this represents the Standard Method ‘starting point’ for housing need. The extent to which this need can be met will be subject to the three authorities’ assessment of potential supply (i.e. site selection process) which will include consideration of any constraints and mitigations. This is set out further in section 5.

Housing Need – Comparison to Standard Methodology

Whilst the NWS HMA authorities have been able to meet housing need in full in the past, it is recognised that this is becoming more of a challenge. This is due to:

- Increases in housing need since previous Local Plans were adopted; and
- Supply of sustainable, suitable and deliverable sites reducing.

Applying the Standard Method formula for the three authorities now shows an increased need of **555 dwellings per annum** compared to that established in current adopted plans, an increase of approximately 25%.

Table 2: Standard Method Calculation

	Current Local Plan OAN (dpa)	Standard Method (dpa)	Difference (dpa)
Crawley	675	755	+80
Horsham	650	911	+261
Mid Sussex	876	1,090	+214
TOTAL	2,201	2,756	+555

Therefore, the ability for each of the authorities to meet their own need (before making any consideration of over-supply to meet HMA needs) is becoming more challenging compared to the most recently adopted plans. This is coupled with recent developments related to Water Neutrality which may constrain housing supply within Crawley and Horsham in the short to medium term.

Standard Method – Considerations

Whilst it is not mandatory to use the Standard Methodology for plan making purposes, Planning Practice Guidance is very clear that alternative approaches should only be used in exceptional circumstances and will be scrutinised more closely at examination.

The NWS HMA authorities' SHMAs prepared by consultants ICENI sets out the Standard Method figure and considers whether there are any exceptional circumstances that would justify taking an alternative approach towards setting the starting point. The SHMAs conclude that, based on current guidance (March 2023), there is no justification for deviating from the Standard Method formula or its components in setting the starting point for housing need (noting the housing requirement/supply is assessed separately as discussed above) within this plan period.

Gatwick Airport – Future Growth Proposals

The SHMAs consider whether there are any circumstances by which housing need has been under-estimated by the Standard Method and therefore should be higher. All three authorities' SHMAs consider whether growth funding is in place to facilitate additional growth (such as Housing Deals, City Growth Deals, etc), whether strategic infrastructure improvements are likely to drive an increase in homes needed locally, and the inter-relationship with the assessed need for affordable housing. These are specific circumstances set out in Planning Practice Guidance that could justify increasing housing need to beyond the figures set out by the Standard Methodology.

The SHMAs consider future growth proposals at Gatwick Airport. The airport lies within Crawley borough's administrative area. In July 2019, Gatwick Airport Limited (GAL) confirmed it had started preparing a Development Consent Order (DCO) application to bring the standby runway into use. Should this be successful, it would increase passenger numbers from 46 million passengers per annum (mppa) in 2019, to 75.6 mppa by 2038 and over 80million by 2047.

It is anticipated the DCO will be submitted to the Secretary of State mid-2023 however a decision is not expected until 2024.

The SHMAs consider potential implications, however at this moment in time any implications are unclear and likelihood of the proposals coming to fruition uncertain. The SHMAs conclude that the expansion plans do not justify increasing housing need however this position should be kept under review. It is more likely that this will need to be factored in to the next suite of reviewed plans when the position is clearer.

Housing Need: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree that:

- The Standard Method figures, set out in Table 1 above, are correct at the time of this SoCG.
- Housing need has increased significantly since the current suite of Local Plans was adopted.
- The ability for each of the three authorities to meet current housing need (both individually and for the primary HMA as a whole) is becoming more challenging, given environmental and infrastructure constraints.
- Consideration has been given to assessing whether an alternative approach could be justified for the starting point for housing need. However, the evidence does not suggest that an alternative approach should be used at this time and there are no circumstances to demonstrate that actual need is higher than the Standard Method indicates.
- Therefore, the Standard Method figures, set out in Table 1 above, are the appropriate housing need figures for the purposes of preparing the NWS HMA respective Local Plans.
- Setting the housing requirement (i.e., the extent to which an authority can meet its housing need) is a separate exercise which will be determined through preparation of the respective Local Plans and informed by the Duty to Cooperate.

5. Assessment of Housing Supply Options: Site Selection

There is a long-standing history of co-operation between the three HMA authority areas to understand the options available within each of the respective authority areas to maximise housing supply, the sites with potential to contribute towards this, and the constraints that impact on suitability and deliverability – both cross-boundary constraints and those specific to each authority area individually.

Site Selection Principles

The three authorities maintain ongoing engagement in relation to the site selection process. Due to individual circumstances (e.g. timescales of plan production, differing constraints, number and typology of sites submitted for consideration) it has not been possible to establish a joint site selection methodology to be used across the three authority areas.

Whilst each authority has its own approach to site selection, there are many commonalities across the HMA. In particular, how each authority has approached the requirements of NPPF paragraph 11 with respect to meeting housing need and demonstrating constraints are common.

The authorities are content that each a) will/have establish a methodology for site selection based on the common considerations below, b) will aim to apply the methodology on a consistent and robust basis and c) are provided with the opportunity to challenge the application of the methodology through ongoing engagement to ensure each authority is maximising housing growth with respect to NPPF paragraph 11.

Whilst these principles are agreed, this does not prejudice the authorities from commenting on the application of any established methodology, or likely impact (both positive and negative) arising from individual sites. However, such comments should be raised at the earliest opportunity through ongoing engagement so that there is ample opportunity to discuss implications, refine conclusions and seek agreements where possible.

Site Selection: Common Considerations and Constraints

Sustainability

The NPPF requires Local Plans to promote a “*sustainable pattern of growth*” (NPPF para 11), and “*be prepared with the objective of contributing to the achievement of sustainable development*”.

For development to be sustainable it needs to be supported by the appropriate infrastructure and services, such as education, health, retail and employment. It should promote the use of sustainable modes of transport (for example, be planned to support new public transport services or located to encourage active travel rather than the use of a car) and seek to protect and enhance the natural environment.

In largely rural districts such as Horsham and Mid Sussex, development that is isolated from existing settlements is unlikely to contribute towards a sustainable pattern of development although this will be assessed on a case-by-case basis through the site selection process. In addition, larger sites may have the potential to deliver on-site infrastructure and services that could enable them to be self-sufficient and deliver sustainable places.

The three authorities agree that the principle of delivering sustainable development, in line with NPPF paragraphs 11 and 16, forms the basis of plan-making and is therefore integrated into their site selection processes and/or documented in Sustainability Appraisals.

Environmental Constraints

NPPF paragraph 11b states:

“*Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”

The authorities’ approach to site selection is based on a common understanding of the constraints to development referred to within paragraph 11b and expanded upon within the NPPF. The authorities agree that sites should not generally be suitable for housing in locations where one or more of the following locations is relevant:

- **Areas of Outstanding Natural Beauty** – great weight should be given to conserving and enhancing AONBs, in accordance with paragraph 177 permission should be refused for major development (as defined by footnote 60) other than in exceptional circumstances.
- **Ancient Woodland** – in accordance with paragraph 180, development resulting in the loss of irreplaceable habitats such as ancient woodland should be refused, unless there are wholly exceptional reasons.
- **Biodiversity** – in accordance with paragraph 180, development on land within or outside a Site of Special Scientific Interest (SSSI) and which is likely to have an adverse effect on it should not normally be permitted unless exceptional circumstances can be demonstrated.
- **Flood Risk** – in accordance with paragraph 159, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. This does not mean that sites with an element of flood risk should be rejected, however it is likely sites significantly affected by flood risk will not be suitable.
- **Heritage** – in accordance with paragraph 199, great weight should be given to heritage asset’s conservation. Where a proposed development will lead to substantial harm (or total loss) consent should be refused. Where less than substantial harm, the harm should be weighed against public benefit.
- **Noise** – Aircraft noise is a particular constraint on noise sensitive development, including housing, in the northern part of Crawley borough, in accordance with NPPF para 185 which states “*Planning policies and decision should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment”*

Infrastructure Constraints

Whilst this Statement of Common Ground focuses on housing matters, the Northern West Sussex Statement of Common Ground (2023) identifies the authorities’ agreement on cross-boundary strategic infrastructure. The SoCG identifies constraints which could theoretically limit housing growth, such as transport, water capacity, education and health.

The SoCG identifies mechanisms for the authorities to work together to aim to resolve cross-boundary constraints and therefore aim to maximise housing growth. This includes commissioning of joint studies, the sharing of conclusions reached by individually commissioned studies (e.g. transport modelling) and seeking opportunities to resolve any such issues collectively (e.g. infrastructure provision).

The authorities do, however, recognise that there are specific infrastructure constraints within each individual authority area (i.e. not cross-boundary) which may potentially constrain housing growth. The authorities will share such information, and the measures put in place to attempt to resolve/mitigate such constraints.

Engagement to Date

The three authorities have, and will continue to, engage positively to discuss potential housing supply as the plans progress towards adoption.

For example, as part of the preparation of the revised District Plan (Regulation 18), Mid Sussex engaged with Crawley and Horsham in 2022 on its site selection process. This included consulting neighbouring authorities on the Site Selection methodology and making refinements as necessary, presenting the approach taken and explaining the conclusions and implications (e.g. broad findings from transport and other studies).

Horsham similarly has engaged with the other Northern West Sussex authorities during their Regulation 18 period. This included inviting discussions on site assessments, mostly through the regular NWS group meetings, but also at bilateral discussions with the other NWS authorities respectively.

In addition to engaging directly through similar meetings set out above, Crawley Borough Council published an updated Strategic Housing Land Availability Assessment in February 2023. This includes an updated introduction giving an account of how the council had assessed the 'suitability' of sites for residential development. The updated SHLAA has supported the spring 2023 Regulation 19 consultation on the Crawley Borough Local Plan Review. The Regulation 19 consultation was also supported by an updated Housing Trajectory, Windfall Statement, Housing Supply Topic Paper, and Compact Residential Development Study, providing further explanation of the extent and sources of the borough's projected housing supply.

On-Boundary and Cross-Boundary Sites

There are large sites close to the respective administrative boundaries that are likely to have cross boundary implications due to their scale and/or location. The NWS authorities have a long-standing history of working together on such sites, including the past commissioning of joint studies (e.g. the 'At Crawley' Study) to understand options for on-boundary and cross-boundary growth potential.

The authorities will continue to work together to understand the growth potential, constraints and cross-boundary impacts that could arise from these sites. Should any of these sites be promoted for development within an authority's Local Plan, separate bi-lateral Statements of Common Ground will be prepared to capture points of agreement/disagreement arising.

Assessment of Options – Local Supply: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree that:

- Each authority has undertaken an assessment of capacity for development within their boundaries, taking account of opportunities and constraints (including cross-boundary) and site suitability and achievability in accordance with the principles established in the NPPF.
- The individual site selection processes will consider sustainability, environmental constraints and infrastructure constraints.
- Authorities will be given the opportunity to scrutinise and comment on each other's methodologies and high-level outcomes through ongoing engagement at the earliest opportunity, in addition to and without prejudice to each LPA's statutory consultee roles as part of the formal plan-making stages.
- On-boundary and Cross-boundary sites may be subject to more detailed engagement and common and uncommon ground will be captured in separate (likely bilateral) SoCGs.
- Cross-boundary engagement processes have, to date, been satisfactorily undertaken and will continue.
- The work of each respective authority has been carried out diligently and there is broad cross-authority support for the principles underpinning the respective site assessments.
- It is for the respective authorities to demonstrate through examinations in public whether appropriate conclusions have been reached on these matters.

6. Ongoing Co-Operation and Governance

As described in Section 1, the three HMA authorities have produced a Northern West Sussex Position Statement (NWSPS) which captures the full suite of agreed cross-boundary matters. This Statement of Common Ground focusses on Housing Need given its importance and the significant co-operation on this matter.

The three authorities are currently at different stages of Local Plan Review preparation. At the time of writing, the current published timetables for the three authorities are as follows:

Table 3: Local Plan Review Timetables

	Regulation 18	Regulation 19	Submission	Examination	Adoption
Crawley	July/Sept 2019	Jan/March 2020 Jan/June 2021 May/June 2023	July 2023	Autumn 2023	Spring/Summer 2024
Horsham	Jan/March 2020	TBC	TBC	TBC	TBC
Mid Sussex	Nov/Dec 2022	Aug/Sep 2023	December 2023	February 2024	Summer 2024

This Statement of Common Ground has been prepared to capture the position on housing need (i.e., the Standard Method) and supply (i.e., proposals in draft plans) at the time of writing. As the Standard Method is updated annually, and draft plans emerge, the position related to housing need within the HMA may change. Therefore, this SoCG will be reviewed as appropriate to ensure it captures the latest position.

Changes to National Policy

In December 2022, the Government commenced a consultation on “Levelling-up and Regeneration Bill: reforms to national planning policy”. This re-iterates the Governments objective of achieving delivery of 300,000 homes per year but also sets out proposed changes to the NPPF which could impact on authorities’ application of the Standard Method (to establish the ‘starting point’) and circumstances which could justify a reduced housing supply. At the time of writing, the government is considering the responses received. A revised NPPF is awaited (scheduled for publication in September 2023 at the earliest) – implications for the NWS HMA authorities will not be clear until this is published. Dependant on the outcome and any change to national policy, a revision to this SoCG may be required to capture any further implications.

Ongoing Engagement

The three authorities have been meeting on an on-going, regular basis as each of their Local Plan Reviews progress. This has enabled each authority to understand the current position in relation to housing supply and the ability (or not) for each authority to meet its own needs and (where possible) increase supply to assist with meeting unmet need in accordance with the priority hierarchy. The authorities have considered options for increasing supply, as well as the outcomes from wider sub-regional groupings (such as the Coastal West Sussex and Greater Brighton group preparing Local Strategic Statement 3). This co-operation will continue.

Ongoing Co-Operation and Governance: Points of Agreement

The Northern West Sussex Housing Market Area authorities agree:

- This Statement of Common Ground captures a 'point in time' and that it will be reviewed and kept up to date as Local Plan Reviews progress.
- To meet regularly to discuss matters as they emerge and take opportunities to find solutions to maximising housing supply within the HMA area and that any conclusions should be evidence based.
- To continue membership and positive involvement with sub-regional groupings such as the Gatwick Diamond and West Sussex and Greater Brighton, including in relation to the preparation of West Sussex and Greater Brighton Local Strategic Statement (LSS) 3.
- This statement is agreed by all parties without prejudice to their respective ability to make representations to each other's emerging Local Plans, albeit these representations will respect the 'Points of Agreement' reached within this SoCG.
- This Housing SoCG will be updated (if required) once the evidence base is refined and more definitive conclusions can be reached on housing need and supply within the HMA.

7. Statement of Common Ground – Signatories



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