



Horsham
District
Council

Duty to Cooperate Statement

July 2024

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1. Introduction

Duty to Cooperate

- 1.1 The Duty to Cooperate (DtC) is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004 (inserted by Section 110 of the Localism Act 2011). It is also included within the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG), specifically in terms of planning strategically across local boundaries. The DtC applies to all Local Planning Authorities, National Park Authorities and County Councils in England as well as a number of other public bodies including the Environment Agency, Highways England and Natural England. It places a requirement on all such bodies to engage constructively and actively on cross boundary matters.
- 1.2 The National Planning Policy Framework (NPPF) was last updated in December 2023. However, under transitional arrangements, the Horsham District Local Plan will be examined against the previous version that was published in September 2023. Both versions provide an explanation of how strategic planning matters should be addressed in local plans. NPPF (Sep 2023) explained that local planning authorities “should collaborate to identify the relevant strategic matters which they need to address in their plans” (paragraph 25). It further states that “effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere” (paragraph 26). ‘Strategic matters’ flow from matters covered by strategic policies, as set out in NPPF paragraphs 20 to 23: these should include housing, commercial development, infrastructure, community facilities, the natural, built and historic environment, and climate change mitigation and adaptation.
- 1.3 The NPPF makes clear that the DtC requires a proactive, ongoing and focussed approach to strategic matters. Constructive cooperation must be an integral part of plan preparation and result in clear policy outcomes which can be demonstrated through the examination process.

Purpose of the Duty to Cooperate Statement

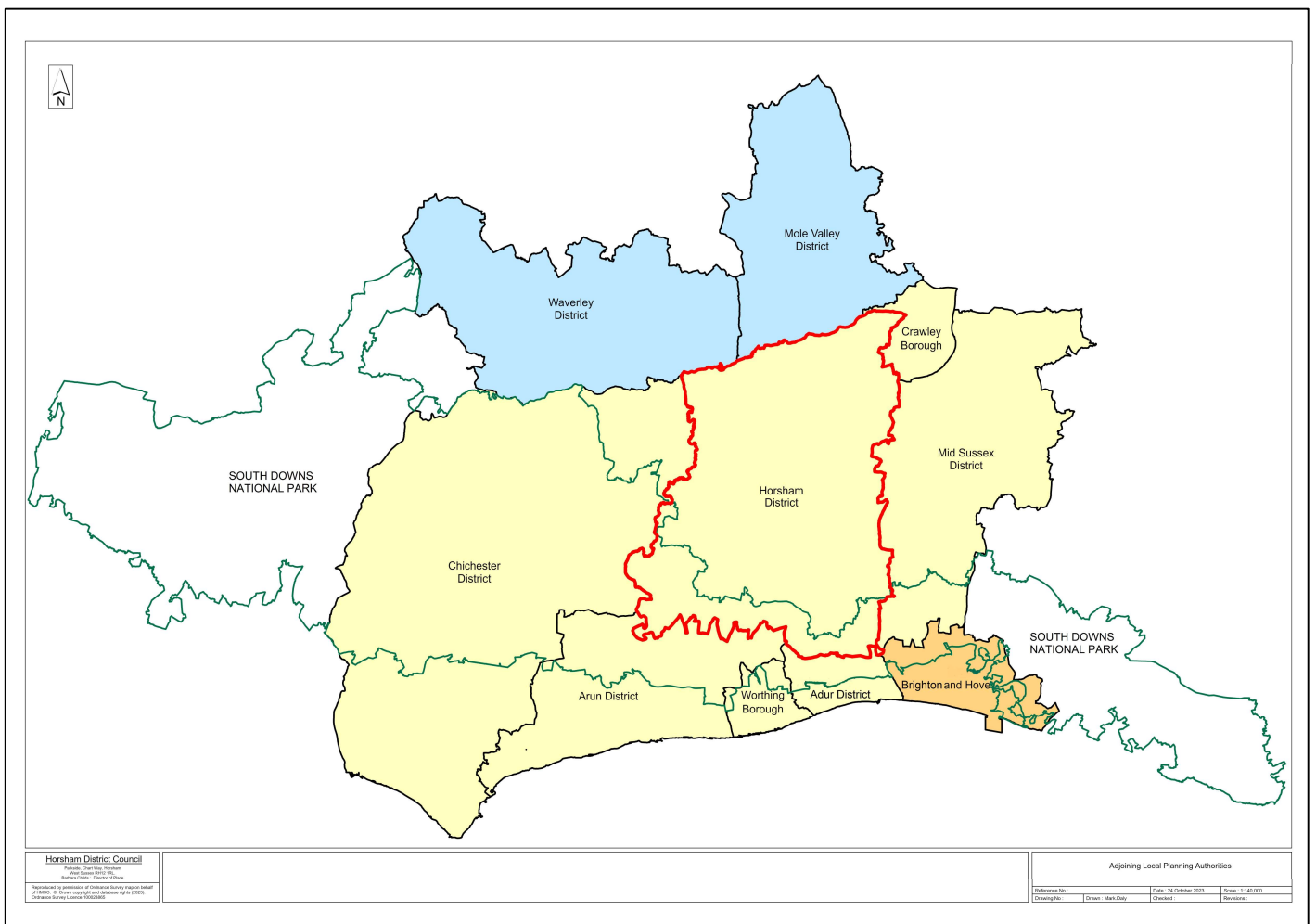
- 1.4 The Horsham District Local Plan 2023 – 2040 (HDLP) has now been submitted for examination. Throughout the preparation of the HDLP, the Council has actively and constructively engaged with key partners. Established practice recognises that the DtC is ongoing up until the date of submission of the Local Plan to the Secretary of State (Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012). This statement documents those activities and highlights the outcomes of such activities, demonstrating how the DtC has been met.
- 1.5 It is recognised that the Levelling Up and Regeneration Act 2023 has changed the planning system’s legal framework and removes the DtC. However, under transitional arrangements, the DtC still has effect for Local Plans that are to be submitted for examination prior to 30 June 2025, and therefore continues to apply to the preparation of the HDLP.

2. Horsham District Context

Geography

- 2.1 Horsham District is located in West Sussex, within the South East of England. The district covers an area of 530km² (205mi²) 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 of the District. In the southern part of the district, around 95km² (36.5mi² miles) lies within the South Downs National Park, where the South Downs National Park Authority is the local planning authority.
- 2.2 As shown in the map below, Horsham District, adjoins a number of different local planning authorities. The West Sussex Districts of Adur, Arun, Chichester, Mid Sussex as well as Crawley and Worthing Boroughs are located on the eastern, southern and western boundaries. The Surrey Districts of Mole Valley and Waverley are located on the northern boundary. Brighton and Hove City Council borders Horsham District's south east corner. West Sussex County Council is the minerals and waste planning authority and the highways authority for Horsham District.

Map 1: Horsham District Council and adjoining authorities



Horsham District Local Plan

- 2.3 The Council's current Local Plan is the Horsham District Planning Framework (HDPF). The HDPF was supported by a Duty to Cooperate Statement which identified the following six strategic issues and showed how the DtC requirements were met:
- Housing

- Economy
- Retail
- Infrastructure
- Environment
- Gypsy and Travellers

- 2.4 The Inspector assessed the HDPF against the DtC, recognising that the plan related to key strategic planning issues and that the Council had demonstrated continuous and constructive engagement on such matters. After examination, the HDPF was adopted in November 2015.
- 2.5 The Council is replacing the HDPF with the Horsham District Local Plan 2023-2040 (HDLP) to set out up to date planning policies on a range of different matters. This includes the matters identified in the Duty to Cooperate Statement that supported the HDPF (economy and retail are grouped together in this document under the economy section). In addition, this document also demonstrates how the Council has met the DtC with respect to water neutrality.
- 2.6 To meet the requirements of the DtC during the preparation of the HDLP, the Council has engaged with all of its neighbouring local planning authorities (see paragraph 2.2) on a bilateral basis to a varying extent, as well as other prescribed bodies and infrastructure providers, to understand and address strategic planning matters.

Groupings

- 2.7 As well as having bilateral arrangements with authorities, the Council forms parts of various groupings relating to specific thematic or geographical matters. Some of the various groupings are set out in Table 1 below and are referenced, where relevant, in further sections of this report.

Table 1: Table of Groupings relevant to Duty to Cooperate

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 Council, Lewes District Council,

Grouping	Description	Partners
	<ul style="list-style-type: none"> - Leaders and Chief Executives of the respective Councils and National Park Authority - Greater Brighton Economic Board - 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 - West Sussex and Greater Brighton Planning Officers Groups – consisting of senior officers to undertake work as directed by the Strategic Planning Board 	<p>Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council</p>
<p>West Sussex Planning Policy Officers Group</p>	<p>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</p>	<p>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</p>
<p>Gatwick Diamond Authorities</p>	<p>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.</p>	<p>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</p>
<p>High Weald AONB Partnership</p>	<p>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.</p>	<p>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</p>

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>	<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</p>
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"> - 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 - 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 Planning Policy Working Group – consisting of Planning Policy Officers to progress policy in relation to water neutrality. Offsetting Implementation Group – A group led by the shared Water Neutrality Project Manager to progress the joint authority offsetting scheme (SNOWS) 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</p>
Sussex Local	<p>A group of authorities that share knowledge and information in relation to local nature recovery</p>	<p>Adur District Council, Arun District Council, Brighton & Hove</p>

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

Statements of Common Ground

- 2.8 Both in relation to bilateral discussions and multi-body groupings, a number of Statements of Common Ground (SoCGs) have been produced. A schedule of these is included in Appendix A and are referenced in relevant sections of the report.
- 2.9 Relevant activities of the different groupings and partnerships, including the production of shared evidence documents and SoCGs, are discussed in relevant further sections of this document. A summary log of meetings with the various groupings and authorities is set out in Appendix B.

3. Strategic Issues and Activities

Housing

Background

- 3.1 Horsham District’s primary housing market is the Northern West Sussex Housing Market Area (NWSHMA). The NWSHMA covers the area of Horsham and Mid Sussex Districts and Crawley Borough. The area was first established in 2009 by the West Sussex Strategic Housing Market Assessment (GVA, 2009) and its extent has been confirmed in further work – most recently in the updates to the Northern West Sussex SHMA undertaken for HDC and Crawley BC in 2019 by Icen Projects, and Mid Sussex DC in 2021. A review of the different documents which considered the extent of the NWSHMA is set out in the NWSHMA Statement of Common Ground: Housing, which was most recently updated in July 2024.
- 3.2 It is recognised that there are some linkages and overlaps with neighbouring housing market areas, particularly with coastal West Sussex authorities and Brighton & Hove. To that end HDC recognises that a southern portion of the District overlaps with the Coastal West Sussex and Greater Brighton Housing Market Area, albeit the most recent NWS SHMA (2019, Icen Projects) concludes that the NWSHMA is comprised, as a best fit to local authority boundaries, of Crawley Borough, Horsham District and Mid Sussex District. The Council is part of the West Sussex and Greater Brighton Strategic Planning Board and remains committed to exploring opportunities to assist unmet housing needs across the sub-region through collaborative work. The Council is also conscious that it borders Surrey authorities – in the form of Mole Valley District and Waverley Borough Councils – who lie in separate housing market areas (West Surrey HMA and the Kingston & North East Surrey HMA, respectively).

Key Activities and Documents

- 3.3 Table 2 below shows a list of key activities and documents relating to the issue of housing.

Table 2: Housing - Key Activities and Documents

Document/Activity	Commentary	Partners
Northern West Sussex Strategic Housing Market Assessment (Iceni, 2019)	Commissioned by CBC and HDC to review HMA boundaries and to assess needs within local authority areas. Involved input and engagement MSDC and built upon historic joint SHMAs.	Crawley Borough Council, Mid Sussex District Council.
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 – See Appendix A

Housing Target

- 3.4 As set out in national policy, when identifying a housing requirement for a Local Plan, the starting point for assessing housing needs is the Government's standard method. At the time of writing, in Horsham District, the standard method calculates a need for 911 homes per year. Though this need figure has inevitably fluctuated over the time of production of the Local Plan, it is broadly consistent with results from applying the standard method in previous years.
- 3.5 Paragraph 66 of the NPPF also explains that as well as meeting the housing needs for the planning authority itself, consideration of unmet needs that cannot be met in neighbouring areas should also be given when setting a housing requirement for a Local Plan. This is something that impacted upon the previously adopted housing target. The HDPF 2015 has a housing requirement of 800 homes: this consisted of 650 homes to meet the objectively assessed needs of Horsham District itself and an additional contribution of 150 homes per year to help address unmet needs within Crawley Borough.
- 3.6 Over the development of the HDLP, the Council has worked closely with neighbouring authorities to understand the scale of unmet needs. The unmet need of the Council's neighbours is substantial. This is set out in the various bilateral SoCGs and/or within correspondence from other local planning authorities requesting assistance with unmet needs. To take two examples - Crawley's Local Plan 2024-40, which is currently at Examination in Public, seeks to meet only 5,030 homes (equivalent to 42% of its own housing need), leaving an unmet need of 7,050 homes in their plan period. Brighton and Hove City Council identify unmet needs of 1,100 – 1,640 homes per year, depending as to whether the urban uplift of 35% is applied to its housing need, as a consequence of being one of the top 20 most populous urban areas in England.
- 3.7 Given this context, HDC has looked to plan positively and account for both its own needs, as well as making a positive contribution to unmet needs elsewhere. The February 2020 Regulation 18 HDLP demonstrates this, as it looked at three options for a housing requirement – all of which (targets of 1,000, 1,200 and 1,400 homes per year) could entirely meet HDC's own housing needs and make contributions towards wider unmet needs.
- 3.8 The July 2021 Draft Regulation 19 HDLP that was considered by Cabinet included an average annualised housing requirement of 1,100 homes per year throughout the plan period, which further demonstrates HDC's positive intent to take account of unmet needs. It sought to make an allowance for half of Crawley's unmet need (193 homes per year) and a contribution towards unmet needs of the coastal authorities (20 homes per year).
- 3.9 The July 2021 Draft Regulation 19 HDLP that was considered by Cabinet was never progressed to publication as it was affected by both changes to the NPPF, which meant that alterations to the draft document were needed, as well as the impact of the impact of the September 2021 Natural England Position Statement affecting all planning applications and allocated/proposed development within the Sussex North Water Supply Zone.
- 3.10 The Position Statement has affected the ability to determine planning applications positively in Horsham District and the wider Sussex North Water Supply Zone. This is discussed further in the water neutrality section of this report.
- 3.11 By the summer of 2023, though precise figures were unknown, it had become apparent that the need for new development to achieve water neutrality would result in HDC being unable to identify a housing strategy in the HDLP that could fully meet the needs of Horsham District and thus, that the HDLP would be unable to contribute to meeting the unmet housing needs arising elsewhere – including in the North West Sussex Housing Market Area and in the wider West Sussex and Greater Brighton sub-region. This was discussed with neighbouring authorities in bilateral meetings held in August and September 2023 and in discussions with both the North West Sussex authorities and the West Sussex and Greater Brighton authorities in November and December 2023.

- 3.12 Following on from detailed trajectory analysis of deliverable housing supply, Strategic Policy 37 of the draft HDLP identifies an annualised housing target of 777 homes per year over its plan period (2023-2040). This amounted to an unmet need of around 2,275 homes (with this figure now being 2,377 when the standard method figure was updated). Neighbouring authorities were written to in November 2023 advising them of the scale of unmet need and were formally asked as to whether they could assist in meeting HDC's unmet needs in their areas. Unfortunately, no authorities were able to commit to helping meet unmet needs – which reflected the outcomes of previous discussions.
- 3.13 Over the spring/summer of 2024, SoCGs were signed with neighbouring authorities reflecting the most up to date position with regards to housing needs and reiterating the commitment to collectively exploring possibilities to help address unmet needs in Horsham District and elsewhere.

Land West of Ifield

- 3.14 As part of the process of developing a Local Plan, HDC has considered the allocation of multiple strategic development site options, that would individually and collectively meet a large proportion of the Council's assessed housing needs.
- 3.15 Land West of Crawley has been promoted as a potential Local Plan allocation to HDC by Homes England, the Government's Housing and Regeneration Agency, as a strategic development site. An aspirational area of search that has been promoted by Homes England for long-term development (post-2040) covers a large area of land in Horsham District which sweeps in a broad arc between the eastern boundary with Crawley Borough to the village of Faygate. Homes England are of the view that the site has long term potential for development that would include up to 10,000 homes, albeit this view is not supported by HDC.
- 3.16 However, the site promoted by Homes England for inclusion in the Horsham District Local Plan 2023-2040 constitutes a smaller part of the site, known as Land West of Ifield, which has been put forward as an option for around 3,000 homes, informal open space/biodiversity improvement land and new community and sporting/leisure infrastructure. A key element of the current 3,000-home proposal is inclusion of land for a new secondary school which is needed to meet pressing unmet school places demand from Crawley Borough (which has committed funding from the Department for Education).
- 3.17 Given the site's location to the immediate west of Crawley Borough, HDC recognised that the site could have cross-boundary impacts. Accordingly, HDC has worked with Crawley Borough Council (CBC) on matters relating to the proposal. This includes regular meetings with the site promoter to understand the evolving proposal as well as to understand and reflect the needs of CBC should the site be allocated.
- 3.18 HDC has sought to allocate the West of Ifield site within the Regulation 19 of the HDLP for 3,000 homes and other uses to support both new and existing communities. It has not sought to allocate the wider West of Crawley site for 10,000 homes as the deliverability of the wider site cannot be demonstrated at this time. Furthermore, there are significant concerns regarding coalescence of Horsham Town (which now includes the strategic development site to the north of the town known as Mowbray) and Crawley.
- 3.19 In addition to working closely with Crawley Borough Council, HDC has also worked closely with West Sussex County Council in relation to the West of Ifield site and all potential strategic allocations as the authority with responsible for strategic matters (e.g. education provision and highways). This relationship is described in the Infrastructure section of this report.

Outcomes and Next Steps

Unmet Needs – Horsham District

- 3.20 HDC is not in a position to demonstrate that it is able to meet its housing needs as identified by the Government's standard method. This has been reported to neighbouring authorities and a request for assistance has been made. No authority has provided a specific, positive response to this request, the reasons given relate to constraints of various sorts that act to limit housing delivery within those areas. However, the Council will, through the various working groups and boards highlighted in this report, rigorously explore future opportunities to meet sub-regional development needs and maintain bilateral discussions with individual authorities in relation to unmet needs.
- 3.21 HDC will continue to work with neighbouring authorities and sub-regional groupings to address the level of unmet housing needs in Horsham District whilst this remains an issue and explore the possibility of assistance from others to addressing unmet needs.

Unmet Needs – North West Sussex

- 3.22 The North West Sussex Housing Market Area (NWSHMA) Authorities agreed and published a SoCG in relation to housing need in July 2023. It recognised housing needs were growing in the HMA and that meeting needs were becoming more challenging. At the time, owing to the stage of preparation of the Horsham District and Mid Sussex District Local Plans, it was not able to identify the level of unmet need across the HMA.
- 3.23 Notwithstanding this, and reflecting that HDC and MSDC had historically provided for unmet needs in CBC, the authorities agreed to a shared prioritisation approach of how any contribution towards unmet needs would be apportioned. This is described on page 7 of the SoCG and sets out that assistance (if able to be provided) should be prioritised as follows:
- Priority 1 – Northern West Sussex HMA
 - Priority 2 – Coastal West Sussex HMA
 - Priority 3 – Other adjacent and nearby HMAs
- 3.24 Since the July 2023 SoCG was agreed, all of the authorities have submitted their Local Plans for examination, with Crawley's Local Plan being very advanced in the process. Accordingly the SoCG has been updated (July 2024) to reflect the most up to date circumstances. The SoCG explains that though MSDC is identifying a surplus for their whole Plan period of 935 homes against their housing requirement, given that HDC is reporting an unmet need of 2,377 homes and CBC an unmet need of 7,505, there is a significant unmet need in the NWSHMA of 8,947 for the period to 2040.
- 3.25 HDC remain committed to engaging proactively with the NWS HMA authorities to address housing need in the future.

Unmet Needs – West Sussex and Greater Brighton

- 3.26 HDC recognises that there is significant unmet housing needs, including that arising from Horsham District, in the West Sussex and Greater Brighton sub-region. HDC is committed to working with partner authorities to address this issue and this is highlighted in bilateral SoCGs with relevant authorities. HDC remain committed to continued working with individual authorities and as part of wider groupings in relation to unmet housing needs in the wider sub-region.

Joint Working with Crawley Borough Council, including Land West of Ifield (HDLP Strategic Policy HA2)

- 3.27 HDC and CBC have a strong history of joint working on strategic planning for housing, both as part of the North West Sussex HMA grouping, and on a bilateral basis. This has enabled a jointly agreed approach to addressing development needs. Key to this was the preparation of a joint SHMA update

to secure up-to-date evidence in relation housing needs for the two authority areas within the context of the NWSHMA.

- 3.28 In terms of planning for strategic growth, HDC and CBC has a signed SoCG, most recently updated in July 2024) - section 7 of which relates to the West of Ifield proposal. This confirms the existence of positive joint working to understand the proposal, recognise the cross-boundary effects that could arise and to reflect CBC's requirements for development on the site (notwithstanding their in-principle objection to the allocation of the site).
- 3.29 The SoCG identifies various detailed requirements that reflect an agreed joint position in relation to the proposed development. This is summarised below:
- Delivery of landscape led development to maintain and enhance separation between settlements and negative impacts on the setting of Crawley;
 - Being of a comprehensive and strategic design to ensure infrastructure needs are provided for;
 - Should seek to achieve a level of sustainability and deliver net zero carbon emissions;
 - Working together (including with West Sussex County Council) to ensure the delivery of a comprehensive transport strategy that includes commitment to the delivery of the Crawley Western multi-modal corridor from the A264 to the A23;
 - Provide for educational needs arising from the development and for wider unmet educational needs;
 - Provide for health provision and to ensure that the design encourages healthy lifestyles; and
 - Open space, sport and recreation provision is provided to meet needs.
- 3.30 The agreed requirements have been reflected in the policy for the site in the Regulation 19 version of the HDLP, now submitted for examination. As expressed in the SoCG, the Councils agree to continued joint working in relation to the site ahead of any future planning application (should it arise) and maintain the transparent and cooperative approach undertaken to date.

Gypsies and Travellers

Background

- 3.31 Horsham District is home to a number of existing Gypsy & Traveller (G&T) sites, predominantly located in rural areas in the centre and south of the district.
- 3.32 It was the intent for a standalone Horsham District G&T Development Plan Document (DPD) to be produced. Draft versions of the DPD were produced in April and December 2017. However in April 2018, prior to the submission of the draft DPD to examination, a site that was being proposed for allocation was withdrawn by its owner, and subsequently the DPD was unable to be taken forward. It was therefore decided that G&T sites would form part of the Local Plan review rather than being included within a standalone DPD.
- 3.33 The Planning Policy for Traveller Sites (PPTS) document sets out the government's expectations in relation to the planning for G&T provision. Among other things, it explains that Local Plans should set targets to address the needs of those who are defined, for the purposes of planning policy, as members of the G&T community. It also explains that Local Plans should identify a supply of deliverable sites for the first five years of the plan period and identify a supply of developable sites or broad locations for growth for years 6-10 of the plan period (and, if possible years 11-15).

Key Activities and Documents

- 3.34 Table 3 below shows a list of key activities and documents relating to gypsies and travellers. Whilst the first two of these were concerned with needs within Horsham District, they are highlighted here as they involved joint work with neighbouring partner authorities.

Table 3: Gypsies and Travellers - Key Activities and Documents

Document/ Activity	Commentary	Partners
Gypsy and Traveller Accommodation Assessment Report, January 2020	Study undertaken by ORS looking at the future need for G&T provision to 2036. Interviews were held with neighbouring authorities to understand individual needs as well as cross boundary issues.	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
Gypsy and Traveller Accommodation Assessment Report, November 2023	Study undertaken by ORS looking at the future need for G&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.	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	The issue of G&T provision is referenced in the multiple Statement of Common Grounds between HDC and other partners. SoCGs will need to be updated to reflect most recent G&T needs and progress with Local Plans.	Various

Assessment of Needs

- 3.35 A Gypsy and Traveller Accommodation Assessment (GTAA) was produced by the consultants, ORS, and published in January 2020. It set out the following need requirement from 2019 - 2036:
- G&T who meet Planning Definition – 93 pitches (of which 65 pitches would be needed in the first 10 years of the plan)
 - Undetermined – 6 pitches
 - G&T who do not meet Planning Definition – 19 pitches

- 3.36 It did not identify a need figure for Travelling Showpeople nor need for transit provision within Horsham District.
- 3.37 Given that a significant length of time had elapsed, a further GTAA (November 2023) was produced by ORS:
- G&T who meet Planning Definition – 77 pitches (of which 58 pitches would be needed in the first 10 years of the plan)
 - Undetermined – 20 pitches
 - G&T who do not meet Planning Definition – 31 pitches
- 3.38 It identified a need for a single Travelling Showperson plot but did not identify need for transit provision with Horsham District.
- 3.39 The methodology involved in undertaking the work was largely the same across both GTAAs and involved holding interviews from officers representing neighbouring authorities and also included information sharing with regards to West Sussex County Council sites and to understand waiting lists for such sites. The need for pitches in the South Downs National Park were specifically considered in both GTAAs, as there is an existing site in the Horsham District which extends over to the boundary of the South Downs National Park Authority. However, it was determined that the caravans were not occupied by members of the G&T community and therefore there were no needs arising from the area.
- 3.40 In October 2022, the Court of Appeal ruled in the Lisa Smith vs The Secretary of State for Levelling Up, Housing & Communities case on the matter of whether the planning definition for G&Ts was lawful. It was found that the policy was discriminatory and although the policy within the PPTS had not been amended at the time (the PPTS was amended in December 2023 to reflect the outcome of the case), the Council and its consultants were aware that the Planning Inspectorate was conscious of the ruling when determining planning applications and considering the issue of G&T during Local Plan examinations. As such, the 2023 GTAA (as did the 2020 GTAA) identifies all components of need and has commissioned ORS to undertake an update to understand the impact of the change of definition on the needs assessment.
- 3.41 The results of the GTAAs were reported back in bilateral and meetings of different groupings and the issue is reflected in various SoCGs.

Plan Target

- 3.42 The ability for the Council to meet G&T needs has evolved over the production period of the Local Plan. Strategic Policy 20 of the draft Regulation 19 Local Plan that was considered by Cabinet in July 2021, identified that through the intensification of existing sites and new allocations a supply of 81 pitches. This was sufficient to meet the needs of those members of the G&T community who met the planning definition (using the 2020 GTAA figures) for the first 10 years of the plan period, whilst also making a contribution to other components of need. As there were no identified needs for Travelling Showpeople, no supply was identified for plots.
- 3.43 The July 2021 Draft Regulation 19 HDLP that was considered by Cabinet was never progressed to publication as it was affected by both changes to the NPPF which meant that alterations to the draft document were needed, as well as the impact of the impact of the September 2021 Natural England Position Statement for Applications within the Sussex North Water Supply Zone.
- 3.44 As the 2023 GTAA figures were emerging, HDC met with neighbouring authorities in August and September 2023. As part of such discussions, the Council informed partner authorities that given the implications of the Smith case it would likely seek to approach others for assistance in meeting needs for all members of the G&T community. A letter in November 2023 was subsequently sent to

authorities formally seeking assistance. Reflective of such discussions, no response was received that indicated that an authority was able to offer assistance to meet unmet needs.

- 3.45 Strategic Policy 43 of the Regulation 19 HDLP now identifies 80 pitches (gross) through a mixture of intensifying existing sites and new allocations. To meet the needs for Travelling Showpeople, a plot is identified by intensifying an existing site.

Outcomes and Next Steps

Unmet Needs

- 3.46 HDC recognises that it is unable to meet the needs for all of the G&T community throughout the plan period. It is committed to working with neighbouring authorities to address this issue. The Council has updated SoCGs with other authorities to reflect the latest position and is committed to working with others to address unmet needs in Horsham District.

Water Neutrality

Background

- 3.47 The issue of water neutrality in Sussex is both novel and complex. A full background to the issue is set out in the Joint Topic Paper: Water Neutrality (May 2023) and its Update (July 2024) and thus is only summarised in this document.
- 3.48 Horsham District in its entirety, as well as parts of Chichester District, Crawley Borough and South Downs National Park Authority, is located within the Sussex North Water Resource Zone (SNWRZ). Southern Water is the water supplier within the SNWRZ. Natural England has advised in a Position Statement (September 2021) that, an adverse affect on the integrity of the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar (hereafter Arun Valley Sites) features due to the abstraction of water to supply the SNWRZ, could not be excluded with certainty.
- 3.49 The Arun Valley Sites are afforded a high level of protection and, as such, the authorities within the SNWRZ are required to demonstrate that its decisions will not have an adverse effect on them – meaning that development needs to demonstrate that it will not increase pressure on water resources. This can be achieved by making development water neutral – where new development does not cause water use to be increased in the SNWRZ.
- 3.50 Because the water neutrality relates to a large geographic area, the Council has been working with other affected authorities, Southern Water and regulatory bodies to overcome the issue. The partner organisations are listed in Table 1, as are the various sub-groups that meet on specific aspects of water neutrality. The formal governance arrangements are set out in the Joint Topic Paper: Water Neutrality (May 2023). The authorities have jointly appointed a Water Neutrality Project Manager to lead on water neutrality and have an agreed Water Neutrality Statement of Common Ground (July 2023), which has been endorsed by Natural England, Environment Agency and Southern Water.
- 3.51 The effect of the need to demonstrate water neutrality has been significant. Since the receipt of the Natural England Position Statement in September 2021 to June 2024, only applications that could deliver 892 homes had been positively determined (around 300 per year) – this contrasts with the housing delivery figures for the three years prior to the Covid pandemic where average housing delivery was around 1,200 per year. Similarly, the impact on the HDC Local Plan (as well as Local Plans of other partners) has been similarly severe, with it taking time to develop an evidence base and agreed approach with partner authorities and organisations on this unique issue.

Key Activities and Documents

3.52 Table 4 below shows a list of key activities and documents relating to the issue of water neutrality joint working. A more detailed summary of milestones and work produced is set out in Section 3 of the Joint Topic Paper: Water Neutrality (May 2023).

Table 4: Water Neutrality - Key Activities and Documentation

Document/Activity	Commentary	Partners
Gatwick sub-region Water Cycle Study (JBA, August 2020)	Evidence base document assessing the impacts of development in relation to water in the Gatwick sub-region.	Crawley Borough Council, Mid Sussex District Council, Reigate and Banstead Borough Council
Water Neutrality Study: Part A (Aecom, July 2021) Part B (JBA, April 2022) Part C (JBA, November 2022)	Set of studies to understand the water use associated with planned new development, understand Southern Water's activities to reducing water use throughout the WRZ and sets out an evidential basis for a policy approach and an offsetting scheme. Parts B & C were jointly procured with CBC and CDC. HDC fed into Part A, having undertaken such work separately in an equivalent study as part of its HRA work	Chichester District Council, Crawley Borough Council, Environment Agency, Mid Sussex District Council, Natural England, South Downs National Park Authority, Southern Water, West Sussex County Council
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 Statement of Common Ground – Water Neutrality (July 2023)	Sets out agreed positions with regards to achieving water neutrality in the WRZ.	Chichester District Council, Crawley Borough Council, Environment Agency, 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
Joint sustainability appraisal work	Joint work undertaken to ensure a consistent approach was taken to sustainability	Chichester District Council, Crawley Borough Council, Mid Sussex District Council

(This work was carried through into individual authorities' sustainability appraisals)	appraisal of the joint model policy, and to potential strategies to address this matter in strategic planning	Council, South Downs National Park Authority, West Sussex County Council
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Collective evidence base

- 3.53 In November 2019, HDC, along with Crawley Borough Council (CBC), Mid Sussex District Council (MSDC) and Reigate and Banstead Borough Council (RBBC) jointly commissioned JBA Consultants to undertake a Gatwick sub-region Water Cycle Study. This document was published in August 2020.
- 3.54 Prior to the publication of the Water Cycle Study in August 2020, Natural England provided responses to the (at the time) emerging HDC, CBC and Chichester District Council (CDC) Local Plans outlining the need for Local Plans to consider water neutrality to meet the Habitat Regulations requirements. In response to this, HDC, together with CBC and CDC, appointed JBA Consultants to undertake further work with a view to establishing how water neutrality could be achieved in the SNWRZ.
- 3.55 The Water Neutrality Study is in three parts. The first part of this work is known as Part A and looked at individual local authority areas within the SNWRZ. For HDC, the equivalent to the Part A work is in the form of a technical note written by Aecom (HDC's consultants for Habitats Regulations work), with JBA Consultants undertaking the work for CBC/CDC. Both the CBC/CDC commissioned Part A document and the Horsham Local Plan Water Neutrality Technical Note, were published in July 2021.
- 3.56 JBA Consultants produced Part B of the Water Neutrality Study. This was published in April 2022 and contained an in combination assessment, bringing together and building upon the findings of the Part A reports. It examined high level ways in which water neutrality could be delivered.
- 3.57 The November 2022 Part C document produced by JBA contained the Mitigation Strategy, providing the main evidential basis for the development of a joint policy approach across the SNWRZ and the establishment of a local authority-led offsetting scheme. It identifies that the levels of development proposed by the respective Local Plans within the SNWRZ could be delivered. The findings of the Water Neutrality Study have been accepted by the Water Neutrality Chief Executive Board and have been used to progress further work relating to water neutrality.
- 3.58 The Water Neutrality Study was supported by input throughout its development from officers of West Sussex County Council, MSDC, South Downs National Park Authority, Environment Agency, Natural England and Southern Water, in addition to the input from the commissioning authorities - HDC, CBC and CDC.
- 3.59 The issue of water neutrality and its impacts on Local Plan making have been discussed by HDC with neighbouring authorities in bilateral meetings and this is reflected in relevant SoCGs.

Joint model policy and joint sustainability appraisal

- 3.60 As recommended by the Part C document, the SNWRZ authorities have developed a joint model policy to ensure consistency across the SNWRZ with regards to considering the water neutrality issue when determining planning applications. The wording of the model policy was developed by the Water Neutrality Planning Policy Working Group, with input from Development Management colleagues. Southern Water, Natural England and Environment Agency have supported the model policy.

- 3.61 The model policy essentially does two things – requires development to be highly efficient and requires offsetting for water that it will use. As agreed in the Water Neutrality Statement of Common Ground (July 2023), the model policy has been used as the basis for the Regulation 19 Horsham District Local Plan policy on water neutrality (Strategic Policy 10).
- 3.62 Alongside the joint policy work, the authorities jointly undertook a sustainability appraisal exercise to ensure consistency of approach within the SNWRZ. The main focus of this was the assessment of the model policy against reasonable alternatives, for which a formal appraisal against relevant sustainability objectives was agreed. This joint appraisal approach is reflected in Chapter 6 of the Horsham District Local Plan Sustainability Appraisal Update (Dec 2023) and is explained further in the Joint Topic Paper: Water Neutrality (May 2023) and its subsequent update (July 2024).

Sussex North Offsetting Water Scheme (SNOWS)

- 3.63 As also recommended by the Part C document, the SNWRZ authorities are continuing to develop a joint offsetting scheme. This is known as the Sussex North Offsetting Water Scheme (SNOWS) and the work is led by the Water Neutrality Project Manager with the aid of officers attending the Offsetting Implementation Group. The ambition behind SNOWS is to create a credit system that would allow planning applicants to pay into to offset water that development proposals would utilise. A SNOWS Project Review (May 2024) has been produced to identify progress with SNOWS.

Outcomes and Next Steps

Agreed governance arrangements

- 3.64 The SNWRZ authorities have agreed governance arrangements relating to water neutrality, with a structure consisting of a Chief Executive Board, a Lead Officer Group, an Offsetting Implementing Group and separate groups for specific Planning Policy and Development Management matters. The regularity of such meetings is identified in Appendix B. The authorities will keep governance arrangements under review to ensure that they remain effective.

Joint Model Policy

- 3.65 A joint model policy relating to water neutrality has been developed and included in various proposed Local Plans, including the Horsham District Local Plan, to ensure a consistent approach to the determination of planning applications across the SNWRZ with respect to the issue of water neutrality.

Establishment of SNOWS

- 3.66 The authorities have agreed to develop SNOWS so it can become operational and be utilised by applicants to offset water that development proposals would utilise. This is considered a priority for the SNWRZ authorities, who have appointed a Water Neutrality Project Manager to lead on this work.

Statements of Common Ground

- 3.67 A Water Neutrality Statement of Common Ground (July 2023) has been agreed. HDC, along with its partner authorities and organisations, agree that this is a shared, key issue and are committed to continual working together on water neutrality.
- 3.68 The Council had updated and finalised bilateral SoCGs with other authorities that includes reference to the water neutrality issue.

Economy

Background

- 3.69 The NPPF identifies the importance of the economy and which is one of the central three strands that enable the planning system to deliver sustainable development. HDC recognises that economies are interconnected and extend beyond local authority boundaries. For instance, Horsham District lies within the Northern West Sussex Functional Economic Market Area (FEMA) with Crawley Borough and Mid Sussex District.
- 3.70 The area is perceived as a strong industrial location with a comparatively weaker office market but with reported demand for high quality 'Grade A' office space in Horsham town. Horsham and Crawley have seen an increase in logistics and distribution related jobs. Crawley represents the dominant commercial centre in the FEMA. By comparison, Horsham and Mid Sussex, which are predominantly rural, tend to operate as secondary property markets. Within the district Horsham town is the largest employment settlement, providing 37% of the jobs. The majority of the businesses in the District are micro or small (90.5% are micro [0 to 9 staff] and 8.1% are small [10 to 49 staff]).
- 3.71 In addition, the majority of Horsham District is located within the Gatwick Diamond economic area, too. This is a network of functional economic hubs, centred upon Gatwick Airport and extends from Croydon in the north, down the A23/M23 corridor to Brighton in the South. A Local Strategic Statement (LSS) was most recently refreshed in 2016 by the Gatwick Diamond Authorities, based on a shared evidence base, and continues to form the basis for inter-authority cooperation on strategic issues relevant to the area, to ensure that decisions made through plan-making are fully informed.
- 3.72 The District also sits within the area covered by the Coast to Capital Local Enterprise Partnership (LEP), although it is noted the Government intends LEPs are in the process of being abolished.
- 3.73 Given this context, HDC has worked closely with partner authorities in relation to the economy and this is reflected in the Local Plan.

Key Activities and Documents

- 3.74 Table 5 below shows a list of key activities and documents relating to the issue of employment.

Table 5: Economy - Key Activities and Documentation

Document/Activity	Commentary	Partners
Northern West Sussex Economic Growth Assessment (Lichfields, Jan 2020)	Updates original study from 2014 and looks at employment and economic needs for the three authorities that form the Northern West Sussex Functional Economic Area.	Crawley Borough Council, Mid Sussex District Council
Northern West Sussex Economic Growth Assessment Focused Update for Horsham (Lichfields, Nov 2020)	Complemented and updated the joint EGA detailed above for Horsham District	Commissioned by HDC, but followed on from the earlier joint work with Crawley Borough Council and Mid Sussex District Council

Gatwick Diamond Local Strategic Statement 2016	A jointly commissioned and adopted document that identifying priority themes for joint working across the area.	Gatwick Diamond Authorities
Defining the HMA and FEMA, Greater Brighton and Coastal West Sussex Strategic Planning Board (GL Hearn, Feb 2017)	Joint study undertaken for the West Sussex and Greater Brighton Strategic Planning Board, to define housing market areas and functional economic market area(s) (FEMAs) across the West Sussex and Greater Brighton area.	Adur District Council, Arun District Council, Brighton and Hove City Council, Chichester District Council, Lewes District Council, Mid Sussex District Council, South Downs National Park Authority, West Sussex County Council, Worthing Borough Council

Assessment of Needs

- 3.75 HDC has a history of working with other authorities to assess needs. It is recognised that Horsham does not form part of a single, self contained, functional economic area. Instead, Horsham District is part of the West Sussex Functional Economic Area (FEMA), together with Crawley Borough and Mid Sussex District. In 2014, an Economic Growth Assessment was jointly commissioned with CBC and MSDC to examine economic and employment needs across the FEMA. An update to this, to support respective Local Plans was again jointly commissioned and published in January 2020, with a Horsham District Specific update published to supplement this in November 2020.
- 3.76 The Northern West Sussex Economic Growth Assessments (2020) (EGAs) undertook assessments in accordance with national Planning Practice Guidance. It assessed a number of scenarios and found a potential demand for 13,300sqm to 179,240sqm for additional employment floorspace, which could be addressed by the commitments at the time. However, the findings also indicate Horsham District is in a strong position to support further economic and employment growth, some stock is outdated/not fit for modern business needs, and that out-commuting is relatively high at 40%.
- 3.77 There are inevitably cross-boundary employment issues, and employment has been a subject of both bilateral and grouping SoCGs. Specifically, the employment needs generated by the population of the proposed West of Ifield urban extension to Crawley and the respective roles of Crawley and Horsham supporting a successful economic strategy. Both parties agree that the approaches taken in the respective local plans are complementary, to ensure a variety of employment opportunities and flexibility of supply within the NWS FEMA and supporting the Gatwick Diamond. This is reflected in the relevant bilateral SoCG.
- 3.78 The most recent SoCG with Brighton & Hove City Council (BHCC, June 2024) identifies that BHCC has significant requirements for employment floorspace, which they are considering as part of the review of their City Plan. They identify that the requirements “are unlikely to be fully accommodated within the city given constrained land availability” but have not made a specific request for assistance at this time. HDC have agreed to work proactively with them both individually and as part of wider groupings in relation to economic matters. They also noted that strategic employment sites identified and safeguarded through the Horsham Local Plan may offer the opportunity to make a positive contribution to the sustainable economic development of the wider sub-region.
- 3.79 No other unmet needs within surrounding authorities have been raised or identified.

The Local Plan's Approach

- 3.80 The employment policies in the Local Plan have evolved over time, in part to reflect feedback from partner authorities. Of particular relevance to DtC is meeting employment needs both within the District and wider geographies.
- 3.81 In order to positively and proactively encourage sustainable economic growth, the Local Plan allocates 17 hectares of employment land. Around a third (6.5 hectares) falls within the strategic allocations in order to help ensure sustainable communities are created and to contribute towards the Council's one job per home aspiration, as detailed in Strategic Policy HA1: Strategic Site Development Principles. The remaining two thirds (10.5 hectares) comprises four allocations of sites spread across the District.

Outcomes and Next Steps

Assessment of Needs

- 3.82 HDC has worked with CBC and MSDC to assess needs in the FEMA. This is set out in the EGA and related updates.

Unmet Needs

- 3.83 The allocations, being in excess of the objectively assessed needs, will help to redress the decline in the pace of job growth in the District, particularly the decrease in B class jobs over the past decade and could contribute to meeting unmet needs of BHCC and others. The allocations will also help to augment the currently limited industrial/warehouse supply in appropriate locations, help address an imbalance in uses between the identified needs and the commitments as indicated by the EGA, and facilitate the provision of new green industries.

Statements of Common Ground

- 3.84 The Council has agreed SoCGs with other authorities that includes up to date references to the matter of strategic economic land supply. However, discussions to date with partners has not identified any pressing need for meeting the supply across administrative boundaries: with the possible exception of BHCC (whose position will not be clarified until they progress further with the review of their City Plan), there is no identified unmet need issue.

Infrastructure

Background

- 3.85 The NPPF identifies the importance of aligning planned growth with infrastructure. Of particular relevance for the purposes of the DtC, paragraph 16c) explains that plans should “be shaped by early, proportionate and effective engagement between plan-makers and... infrastructure providers and operators.”
- 3.86 The majority of engagement in relation to infrastructure has taken place in the preparation of the Council's Infrastructure Delivery Plan (IDP), which identifies the infrastructure requirements to accommodate planned growth.
- 3.87 HDC is not responsible for the delivery of the majority of infrastructure services and facilities. Therefore, much of the engagement has been with external bodies. This includes public bodies, such as Network Rail, National Highways (previously Highways England), emergency services, the West Sussex Integrated Care Board (ICB) and the District's Parish and Neighbourhood Councils. A key body is West Sussex County Council who have responsibilities for highways, education, public rights of way and minerals and waste.

3.88 As well as engagement with the bodies above, direct and continuous engagement has been had with other bodies, such as utility providers. This includes Southern Water who are responsible for water supply across the district, and for wastewater and sewerage for all but the northeastern corner which falls under Thames Water.

Key Activities and Documents

3.89 Table 6 below shows a list of key activities and documents relating to the issue of infrastructure. It should be noted that the Infrastructure Delivery Plan (IDP) is very broad in scope and incorporates a multitude of DtC activities. There has been ongoing engagement with partners on progress of the development strategy, requesting input of, and feedback from, infrastructure providers through meetings, consultations and email exchanges. These are explained further in the IDP itself.

Table 6: Infrastructure - Key Activities and Documentation

Document/Activity	Commentary	Partners
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
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>

Infrastructure Delivery Plan (IDP)

- 3.90 Early, open and ongoing engagement has been key to ensuring there is an understanding of likely needs and issues arising in relation to baseline infrastructure and the delivery of infrastructure to support planned development. This information is set out in the IDP (2024).
- 3.91 Infrastructure is a wide ranging term and thus the IDP is a comprehensive document covering the following matters:
- Transport
 - Education
 - Health and Social Care
 - Community and Sports Facilities
 - Green Infrastructure
 - Emergency Services
 - Utilities and Waste
- 3.92 The IDP has been in continuous development over the production of the Local Plan, reflecting engagement with partner bodies. A draft version of the IDP (2020) was produced based on the understanding of infrastructure needs at the time and made available as part of the Regulation 18 Horsham District Local Plan. A version of the IDP (2023) accompanied the Regulation 19 HDLP. Comments were received on the respective versions of the IDP itself and in relation to infrastructure more generally and have been considered to enable updates to the IDP. Direct engagement with partner bodies, including the sharing of draft infrastructure schedules and the likely development strategy of the Local Plan, has been key to evolving the document and capturing infrastructure needed to accommodate growth set out in the Local Plan.

Transport Studies

- 3.93 An important aspect of the plan-making is to consider the impacts of planned development on the road network. Though HDC is the LPA, West Sussex County Council (WSCC) are the Highways Authority and have been closely involved in the commissioning and production of the Horsham Transport Studies (2021-24) given their responsibilities and expertise.
- 3.94 Though there is no part of the District which includes any of the Strategic Road Network (SRN), there has been engagement with National Highways in the progression of the Horsham Transport Study (2023) to ensure impacts of the plan on the wider SRN are appropriately mitigated. There have been multiple meetings with National Highways at which they have fed back to HDC and WSCC on strategic and technical issues. National Highways have also provided technical critique to work forming part of the Transport Study, and as a consequence have now indicated that they have no outstanding technical objections – this is made clear in the SoCG.

Local Plan policies

- 3.95 The Regulation 19 Horsham District Local Plan includes numerous policies relating to different types of infrastructure, which are connected to the overarching Strategic Policy 23: Infrastructure Provision.

Joint Working with Crawley Borough Council

- 3.96 The Council has engaged in cross-boundary working on infrastructure matters with all neighbouring local authorities and with West Sussex County Council, as documented in the Statements of

Common Ground listed in Appendix 1, and throughout this report. Horsham District Council and Crawley Borough Council in particular have a strong history of joint working on strategic planning for infrastructure, given their close functional links. This has led to tight coordination of infrastructure planning, for example with regards addressing transport and education. Notable examples are:

- Ensuring a consistent approach to transport modelling, and sharing outcomes from respective transport assessments
- HDC feeding into the CBC commissioned Crawley Western Link Road Corridor Study and a joint approach to identifying an area of search for the proposed link road / multi-modal corridor
- Together with West Sussex County Council, agreeing a cross-boundary approach to meeting an urgent need for secondary school places arising mainly from new development in Crawley

3.97 The bilateral SoCG between HDC and CBC (July 2024) provides further evidence of these activities.

Outcomes and Next Steps

Infrastructure Delivery Plan

3.98 The IDP (2024) has been published. It is intended to be a live document and will be reviewed to ensure it is fully up to date and reflective of the requirements needed to support the Plan. Engagement with infrastructure providers and service operators will therefore continue.

Transport Studies

3.99 Transport Studies have been produced by consultants, reflecting close working with West Sussex County Council and National Highways. Separate SoCGs have been agreed with National Highways and WSCC.

Horsham District Local Plan Infrastructure Policy

3.100 The Local Plan includes a number of policies which relate to different types of infrastructure. In addition, specific infrastructure requirements have been set out as part of strategic site allocations to reflect the needs of infrastructure providers. A number of amendments have been made to the policies as a result of feedback from infrastructure providers.

'Forge Wood' new secondary school

3.101 The bilateral statement signed by HDC and CBC includes reference to "education provision meeting Crawley's needs [which] would be subject to delivery by the Department for Education, securing sufficient alternative funding, and/or appropriate developer contributions or sufficient volumes of CIL being available from growth within Crawley Borough". This reflects an agreement in principle between the two authorities, together with WSCC, that a new secondary school is delivered as part of any strategic development West of Ifield. Multi-lateral discussions have taken place with the Department for Education, with a site identified within the West of Ifield strategic allocation site in Horsham District. The new school is expected to be delivered within the next few years.

Environment

Background

3.102 Legislation, national policy and guidance requires environmental matters to be taken into account through the production of the Local Plan. Environmental assets are interconnected and extent beyond local authority boundaries.

- 3.103 The land in the District is predominantly rural in character and varied in nature, the majority is agricultural. Much of the north-eastern part of the District lies within the High Weald Area of Outstanding Natural Beauty (AONB), and the southernmost part of the District is within the South Downs National Park (SDNP) though, as South Downs National Park Authority (SDNPA) is the local planning authority for the SDNP, this area is not covered in the Horsham District Local Plan. Around 8% of the District has been designated as of importance for nature conservation. Parts of the District are subject to flooding and the Council continues to work with other bodies in the development of its Strategic Flood Risk Assessment (SFRA)
- 3.104 Outside of the AONB and National Park designations, much of the land is important for the overall character of the District with limited capacity for development as evidenced by the Landscape Capacity Assessment (2020). The NPPF seeks to ensure local character, history and landscape setting, and recognises the intrinsic character and beauty of the countryside. In Horsham District, visual breaks between smaller and larger settlements are greatly valued locally. The undeveloped countryside also provides important 'ecosystem services' such as flood protection, fuel/construction sources and sustainable food production, and helps reduce the impact of climate change. In addition to this a number of landowners and bodies are actively managing land to enhance biodiversity, most notable are the Knepp Estate rewilding project and the Weald to Waves wildlife network initiative. These form important assets in respect of green infrastructure and biodiversity net gain, and also the Local Nature Recovery Strategy, for which West Sussex County Council is the Responsible Authority.

Key Activities and Documents

- 3.105 Table 7 below shows a list of key activities and documents relating to the issue of environment.

Table 7: Environment - Key Activities and Documents

Document/Activity	Commentary	Partners
Sustainability Appraisal (including Strategic Environmental Assessment) Work (2019 – 2023)	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.	Chichester District Council, Crawley Borough Council, Environment Agency, Historic England, Natural England
Habitat Regulations Assessment work: Screening Report (Jan 2019, Place Services) HLP HRA (Nov 2023, AECOM)	Process to understand the impacts of Local Plan on protected environmental sites and to advise on appropriate policy mechanisms to avoid adverse effects.	Natural England
Strategic Flood Risk Assessment (January 2020, AECOM)	Provides a strategic overview of flood risk in the District. Has been developed with others with responsibilities of	Environment Agency, Southern Water, Thames Water, West Sussex County Council

	different aspects related to flooding.	
High Weald Area of Outstanding Natural Beauty Management Plan (2019-2024)	A joint plan containing policies for the management of the AONB, as required by legislation. Produced by the High Weald Joint Advisory Committee, which is a partnership of the 15 LPAs and other bodies.	Ashford Borough Council, Crawley Borough Council, East Sussex County Council, Hastings Borough Council, Kent County Council, Mid Sussex District Council, Natural England, Rother District Council, Sevenoaks District Council, Surrey County Council, Tandridge District Council, Tonbridge and Malling Borough Council, Tunbridge Wells Borough Council, Wealden District Council, West Sussex County Council
West Sussex Local Nature Recovery Strategy	Document in production that will agree nature recovery priorities across West Sussex and propose actions in specific locations.	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

Evidence Base

- 3.106 The Sustainability Appraisal (SA) is an iterative process that assesses the impact of the Local Plan on key sustainability objectives (environmental, economic and social) to understand whether its policies would deliver sustainable development. Because the Council's SA work also incorporates the requirements of the Strategic Environmental Assessment (SEA) Regulations, it also focuses on whether the Local Plan would likely have significant effects on the environment.
- 3.107 Because SA work is an iterative process, it has evolved during the development of the Local Plan. The first step involved a Screening Report, which was submitted to statutory consultees (Environment Agency, Historic England and Natural England) for their input for a five week period from 3rd September 2019. The feedback received was taken into account when producing the Sustainability Appraisal (LUC, 2021) that accompanied the draft Regulation 19 Local Plan that was considered by HDC's Cabinet in July 2021, which assessed the impacts of the draft Local Plan on the sustainability objectives. An SA Update (December 2023) accompanied the Regulation 19 Horsham District Local Plan.
- 3.108 The Habitats Regulations Assessment has been developed during the preparation of the Local Plan to assess the impacts on protected European sites. An initial screening report (January 2019) was sent to Natural England, with further engagement with Natural England following comments made on the Regulation 18 Local Plan and, in particular, in relation to the water neutrality issue. That engagement has informed the HRA and executive summary (November 2023) that accompanied the Regulation 19 Horsham District Local Plan. The HRA was made available for representations at the Regulation 19 stage.
- 3.109 Further work is approaching completion relating to the air quality impact on The Mens SAC to look at the in-combination effects of proposed development in Chichester and Horsham District. This involved working with Natural England and Chichester District Council. A commitment to continue collaborative working is referenced in referenced in SoCGs.
- 3.110 HDC's consultants, AECOM, worked with West Sussex County Council (as Lead Local Flood Authority, Environment Agency (as the authority that manages flood risk from rivers), Southern Water and Thames Water (responsible for surface water drainage in different parts of the district) to understand flood risk in the district. This engagement is reflected in the Strategic Flood Risk

Assessment (SFRA, 2020), that supports the Local Plan. The SFRA is being updated following engagement with such bodies to reflect new climate change allowances and flooding from all sources.

The Local Plan's Approach

- 3.111 The Council has benefitted from being part of the Sussex Local Nature Partnership network, consisting of relevant authorities. The grouping has monthly webinars to exchange knowledge and information. This has included sessions on the issues of Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS). Such exchanges have informed policy development, which is reflected in Strategic Policy 17: Green Infrastructure and Biodiversity. The Council has worked with West Sussex County Council, as the responsible authority and other West Sussex authorities, to input into the emerging West Sussex LNRS, which is expected to be published in Summer 2025.
- 3.112 The Council is also part of the Sussex Air Quality Partnership. The Partnership has developed the Air Quality and Emissions Mitigation Guidance for Sussex (2021) document, and this is reflected in the Strategic Policy 12: Air Quality. The Council has reflected comments from bodies, including Environment Agency, Natural England and South Downs National Park Authority when drafting policies, including in respect of water, landscape and light pollution.

Outcomes and Next Steps

Evidence Base Documents

- 3.113 Both the SA and HRA processes have involved input from statutory bodies. HDC will continue to liaise with the statutory bodies as the Local Plan progresses through the examination process on key matters and/or should issues arise. Such liaison may necessitate making changes to either/or the SA or HRA or suggesting further main modifications to the Local Plan. The SFRA has similarly involved engagement with relevant bodies.

Local Plan Policy

- 3.114 HDC will continue to engage with all relevant stakeholders on an ongoing basis to facilitate the planning policy objectives and legislative requirements. Wording of policies have been amended to reflect the views expressed formally as part of representations on versions of the Local Plan, as well as those arising from ongoing discussions. This includes its role as a 'Supporting Authority' in respect of the West Sussex Local Nature Recovery Strategy.

Statements of Common Ground/Position Statements

- 3.115 SoCGs have been with other authorities to include the up-to-date position in relation to environmental matters reflecting the collaborative work undertaken.

4. Appendices

Appendix A: Statements of Common Ground

The following table shows a list of agreed of Statements of Common Ground (SoCGs). Further SoCGs are scheduled to be produced and some will be updated.

Table 8: Log of Statements of Common Ground

Document	Date	Partners
Grouping SoCGs		
Northern West Sussex Statement of Common Ground	May 2020	Crawley Borough Council, Mid Sussex District Council, West Sussex County Council
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
Bilateral SoCGs		
Worthing Borough Council/ Horsham District Council Statement of Common Ground	June 2021	Worthing Borough Council
Horsham District Council/ Mole Valley District Council Statement of Common Ground	August 2021	Mole Valley District Council

Horsham Duty to Cooperate: Statement of Common Ground Part A	January 2022	Arun District Council, Brighton & Hove City Council, South Downs National Park Authority, Waverley Borough Council
Horsham/ Arun District Council Statement of Common Ground Part B*	November 2021	Arun District Council
Horsham District Council & South Downs National Park Authority Statement of Common Ground Part B*	November 2021	South Downs National Park Authority
Horsham District Council/ Brighton and Hove City Council Statement of Common Ground Part B*	December 2021	Brighton & Hove City Council
Horsham/Waverley Statement of Common Ground Part B*	January 2022	Waverley Borough Council
Horsham/Crawley Statement of Common Ground	July 2023	Crawley Borough Council
Horsham District Council/ Brighton and Hove City Council Statement of Common Ground Part B*	June 2024	Brighton & Hove City Council
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
Documents awaiting sign off		
Horsham/Waverley Borough Council Statement of Common Ground		Waverley Borough Council
Horsham/Mid Sussex Statement of Common Ground		Mid Sussex District Council

* For the SoCGs indicated, a common Part A document was agreed, with a specific Part B document relating to bilateral matters.

Appendix B: Duty to Cooperate Summary Log

The table below contains information relating to meetings and matters of cooperation with key groupings, authorities and bodies, relevant to the Horsham District Local Plan and up-to-date as of July 2024.

In most circumstances, email was the primary form of communication between HDC and other organisations, but it is not practical to record this detailed information in the table below, therefore Table 9 presents a summary.

Table 9: Duty to Cooperate Summary Log

Authority/Organisation	Meetings	Commentary/Outcomes
Groupings		
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	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.

	Group meet twice a month	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	<p>Leaders and Chief Executives</p> <p>14.07.17, 17.11.17, 26.01.18, 18.04.18, 25.05.18, 25.07.18, 12.10.18, 09.11.18, 23.11.18, 23.01.19, 08.03.19, 25.07.19, 31.10.19, 27.01.20, 24.02.20, 23.10.20, 19.11.20</p> <p>Strategic Planning Board</p> <p>06.02.17, 04.09.17, 29.01.18, 23.07.18, 26.11.18, 18.02.19, 12.09.19, 09.10.20, 30.03.21.</p> <p>Planning Officer Group</p> <p>23.01.17, 08.05.17, 20.11.17, 15.01.18, 30.04.18, 16.07.18, 12.11.18, 14.01.19, 16.01.20, 16.03.20, 22.06.20, 23.09.20, 05.02.21, 20.05.21 13.12.23</p>	<p>Meetings used to share information regarding Local Plan making and discuss key strategic issues affecting sub-region.</p> <p>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.</p> <p>Water neutrality has been the focus for many authorities in the grouping (see above).</p>
Neighbouring Local Planning Authorities/ County Councils		
Adur DC	11.08.20, 03.02.21, 16.09.21, 07.09.23	Adur & Worthing Councils now have a shared planning service. See Worthing BC, below.

Arun DC	23.07.20, 16.06.21, 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	28.07.20, 04.03.21, 09.09.21, 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	17.12.19, 10.08.20, 10.08.20, 05.10.21, 10.11.21, 14.12.21, 14.06.22, 13.12.22, 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	Officer level meeting scheduled every 3 weeks Senior Officer level meeting scheduled every 6 weeks. 21.09.23 Meeting with Cabinet members and Lead officers	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	20.07.20, 02.09.20, 13.04.21, 25.08.21, 29.09.21, 30.08.23	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. HDC request for assistance for unmet housing and G&T needs sent 24.11.23. Made clear in response to HDLP that cannot meet G&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.
Mole Valley DC	27.07.20, 21.01.21, 30.03.21, 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.
Reigate and Banstead BC	15.07.20	Have discussed progress of respective Local Plans, bilaterally and as part of wider groupings – e.g. Gatwick Diamond.
South Downs National Park Authority	24.07.20, 28.09.20, 27.09.23	Production of SoCG (November 2021), covering cross-boundary development needs, sites within the SDNPA's setting and the Shoreham Cement Works site.

		HDC request for assistance for unmet housing and G&T needs sent 24.11.23. Response received – likely to be unable to assist.
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	28.07.20, 04.03.21, 09.09.21, 12.09.23	Production of SoCG (January 2022), 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.	Ongoing discussions with WSCC all to share information relevant to Local Plan preparation. A SoCG was published in July 2024. 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.
Worthing BC	11.08.20, 03.02.21, 10.03.21 16.09.21, 07.09.23	Production of SoCG (November 2021), referenced housing, G&T, employment and wildlife sites. A shared SoCG for Adur & Worthing was agreed in July 2024 that provided contextual information and focused upon housing need and gypsy and traveller accommodation. 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
Statutory Bodies		
Environment Agency	03.03.21, 26.03.21, 09.04.21, 23.04.21, 15.07.21, 25.04.24	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. 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.

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	21.06.21, 21.10.21, 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	10.12.20, 28.01.21, 22.02.21, 07.04.21, 28.04.21, 14.09.21, 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>