



**Horsham  
District  
Council**



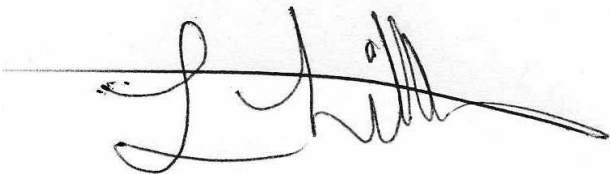

**Brighton & Hove  
City Council**

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

### **Horsham Local Plan 2038: Regulation 19**

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#### **Signatories:**

CLlr Leo Littman, Lead Member for Planning	CLlr Lynn Lambert, Cabinet Member for Planning and Development
	

**Dated:** 13/12/2021

8/11/2021

#### **Statement**

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##### **1. Introduction and Scope**

- 1.1 This statement supplements the Statement of Common Ground Part A which forms the first part of this document. The purpose of this statement is to document the strategic cross-boundary matters that have been or are being addressed jointly by the parties, as necessary to demonstrate effective joint working, or to draw out areas of common ground that are specific or unique to the parties.
- 1.2 The matters dealt with in this statement are:
  - Section 2: Housing need
  - Section 3: Gypsy and Traveller Accommodation
  - Section 4: Employment
- 1.3 This statement has been produced in preparation for the Regulation 19 stage of the Horsham Local Plan 2038. It is anticipated that this statement will be updated to relate to later stages of the Local Plan and changes in circumstance.
- 1.4 Both signatories to this statement reserve the right to withdraw its endorsement to this statement at any time. If this situation arises, formal withdrawal from the agreement should be set out in a formal written notification to the other signatories to this statement.



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## **2. Housing need**

### *Local housing need*

- 2.1 The starting point for Local Plans is the standard housing methodology which, at the time of writing, identifies housing needs of 897 for Horsham District Council (HDC) and 2,331 for Brighton and Hove City Council (BHCC). These figures exceed housing targets contained within the respective adopted Local Plans, as the Horsham District Planning Framework (HDPF) sought to deliver 800 homes per year over its plan period, with the City Plan Part One making provision for 660 homes per year.
- 2.2 HDC and BHCC are in different positions in relation to the preparation of Local Plans. HDC is preparing the Regulation 19 version of its Local Plan 2038, which reviews and will replace the HDPF. HDC is able to demonstrate that it is able to meet its own needs and does not seek the assistance of other authorities, including BHCC, in this matter with regards to the Horsham Local Plan 2038.
- 2.3 BHCC has submitted its City Plan Part Two for examination and hearings are scheduled to commence in November 2021. It will commence a review of City Plan Part One, including the housing target, once City Plan Part Two is adopted. BHCC has significant unmet housing needs, a situation compounded by its inclusion in the government's December 2020 amendment to the revised standard method that applies a 35% uplift to the housing need figures for the top 20 most populated cities and urban centres.

### *Wider Housing Needs*

- 2.4 The parties note that Horsham District primarily lies within the Northern West Sussex HMA, whilst Brighton & Hove and a modest southern portion of Horsham District lie within the Sussex Coast HMA.
- 2.5 Both authorities are members of the West Sussex and Greater Brighton Strategic Planning Board. Both agree that the best way of addressing the significant scale of unmet need across the wider sub-region is through progressing work on Local Strategic Statement 3 and/or through alternative approaches to strategic planning and are committed to working together and as part of this wider grouping to address this issue. BHCC has made a formal request to HDC to seek assistance with meeting the city's unmet housing need<sup>1</sup>.
- 2.6 HDC's Regulation 19 Local Plan is still being prepared and its proposed housing target is not yet finalised. Notwithstanding this, HDC's position is that in planning to meet housing needs in its Local Plan, its priority is to:
- a) Meet its own identified needs;
  - b) Seek to meet as far as is possible, approximately 50% of the unmet need in the Northern West Sussex HMA for the period 2021-2038; and

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<sup>1</sup> The full scale of unmet housing need and other unmet development needs is set out in the letter to HDC dated 22 September 2021.



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- c) Subject to meeting approximately 50% of the unmet housing needs within Northern West Sussex, explore options to help meet unmet need within the West Sussex and Greater Brighton area.

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

### **3. Gypsy and Traveller Accommodation**

- 3.1 The parties note and agree that HDC does not seek for its Gypsy and Traveller needs to be met within other local authorities. There are unmet needs within the South Downs National Park local planning authority area falling within the administrative boundaries of Brighton and Hove City Council.
- 3.2 HDC were signatories to a SoCG between BHCC and other authorities in relation to Gypsies and Travellers<sup>2</sup> in Autumn 2019 and confirm that the position has not changed.

### **4. Employment Uses**

- 4.1 The parties note and agree that HDC does not seek its employment needs to be met within other local authorities. BHCC confirms that it has unmet needs for certain types of employment provision. Whilst not actively seeking for assistance from other authorities at this point, BHCC would support any additional provision in neighbouring local plans which could help address its current and potential future unmet employment needs, should suitable opportunities be identified. BHCC note 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.
- 4.2 The parties agree, as identified in Part A of this Statement of Common Ground, to continue to work proactively and collectively as part of wider groupings (Gatwick Diamond, Coastal West Sussex and Greater Brighton Planning Board, and Coast to Capital LEP) in relation to economic matters.

### **5. Closing matters and further work**

- 5.1 The parties have demonstrated in Parts A and B of this statement that they have worked jointly and constructively on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.

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<sup>2</sup> Included in the following pages.

## Statement of Common Ground

### Gypsies and Travellers


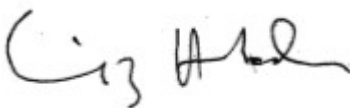




#### List of Parties Involved

This Statement of Common Ground (SOCG) is a jointly agreed statement between Brighton & Hove City Council and neighbouring planning authorities:

- Adur and Worthing Councils
- Horsham District Council
- Lewes District Council
- Mid Sussex District Council
- South Downs National Park Authority

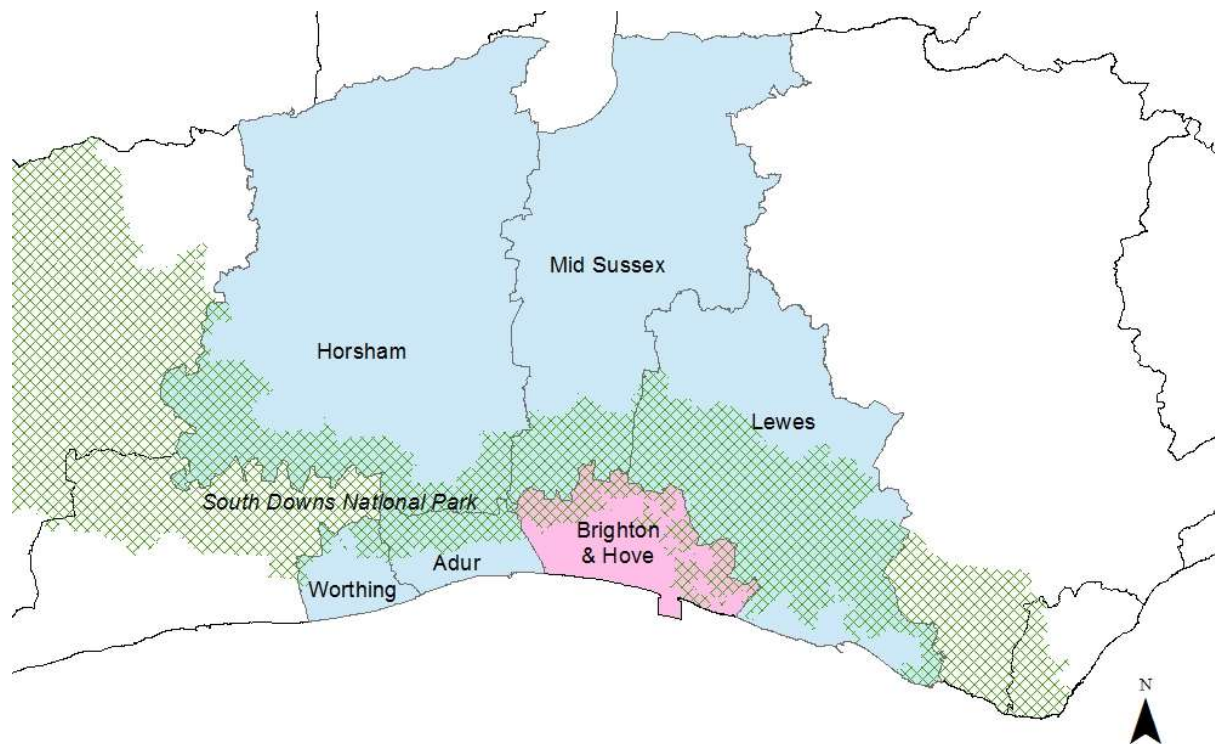
The purpose of this SCG is to set out how BHCC and neighbouring authorities have actively and positively worked together to meet the requirements of the Duty to Cooperate with regard to gypsy and traveller issues. It reflects the agreed position between the parties.

#### Signatories

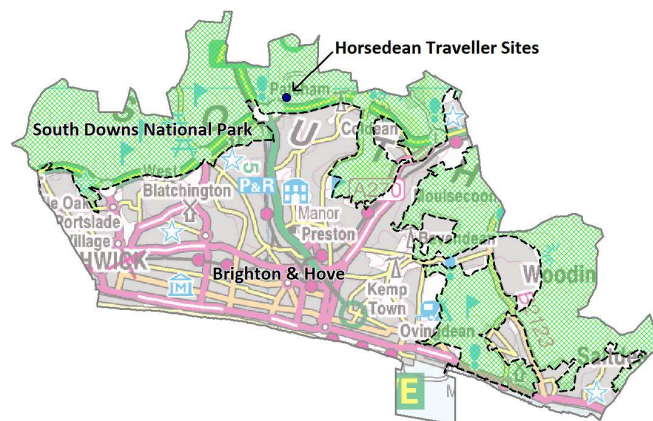
Authority	Name	Position	
Adur and Worthing Councils	<i>James Appleton</i>	Head of Planning and Development	
Brighton & Hove City Council	<i>Liz Hobden</i>	Head of Planning	
Horsham District Council	<i>Catherine Howe</i>	Head of Strategic Planning	
Lewes District Council	<i>Tondra Thom</i>	Planning Policy Lead - Lewes District & Eastbourne Borough Councils	
Mid Sussex District Council	<i>Cllr Andrew MacNaughton</i>	Cabinet Member for Housing & Planning	
South Downs National Park Authority	<i>Lucy Howard</i>	Planning Policy Manager	

## Strategic Geography

The SOCG geography covers Brighton & Hove and adjacent districts and boroughs, including that part of the South Downs National Park that lies within the respective local authority areas.



*Map 1: Strategic Geography of the Statement of Common Ground*



*Map 2: Inset Map showing South Downs National Park Area within Brighton & Hove*

## **Strategic Matters**

This SOCG relates to the provision of permanent gypsy and traveller pitches within Brighton & Hove administrative area over the City Plan period.

A Gypsy and Traveller Accommodation Assessment (GTAA) produced jointly by BHCC and the South Downs National Park Authority (SDNPA) authorities in 2014 indicated an assessed need for new permanent traveller pitches over the period 2013/14 – 2027/28 as follows:

**Table 1 –Previous assessment of need 2013/14 – 2027/28 (GTAA, 2014)**

Status	Brighton & Hove LPA area	SDNP LPA area within Brighton & Hove
Residential need 2013/14 – 2017/18	15	8
Residential need 2018/19 – 2022/23	2	2
Residential need 2023/24 – 2027/28	2	3
Total residential need 2013/14 – 2027/28	<b>19</b>	<b>13</b>

This need was in addition to the 12 permanent pitches constructed at St. Michael's Lane, Hove. There was no need identified for travelling showpeople.

To seek to address this requirement, a joint site search exercise was undertaken by BHCC and the SDNPA in 2016-17 covering the administrative area of Brighton & Hove (i.e. including part of the South Downs National Park) to establish to what extent the need for new traveller pitches might be met through site allocations. No suitable and available sites were identified through this process.

A Duty to Cooperate process was therefore undertaken with neighbouring authorities in response to the current unmet need within the City Council's administrative area. Formal requests were made in summer 2018 to all authorities bordering Brighton & Hove's administrative boundary to ascertain whether and to what extent they were able to provide additional pitches to assist in meeting the need within BHCC.

No neighbouring authorities were able to assist in meeting the unmet need arising within Brighton & Hove at that time.

Information received is set out in Table 2 below.

Table 2: Information received from Neighbouring LPAs regarding pitch requirements

LPA		Pitch Requirement	Local Plan Allocations	Unmet Need
Adur		6	4	2
Horsham (outside SDNP) <sup>1</sup>		-	39	-
Lewes (outside SDNP)		5	5	0
Mid Sussex (outside SDNP)		23	0 <sup>2</sup>	10
Worthing (outside SDNP)		0	0	0
South Downs National Park	Area within Horsham	0	0	0
	Area within East Sussex (Lewes, Eastbourne, Wealden)	6	5	1
	Area within Mid Sussex	0	0	0
	Area within Worthing	0	0	0

In response to this outcome BHCC commissioned an updated Gypsy and Traveller Accommodation Needs Assessment to gain an up-to-date understanding of the current and future need for pitches and reflect the following factors:

- The time elapsed since the research for the previous study was undertaken
- The new definition of traveller as set out in the Government's Planning Policy for Gypsies and Travellers (2016);
- The delivery and opening of the site at St. Michael's Way, Hove which provides 12 permanent pitches
- Changing patterns of unauthorised encampments in the city.

The Assessment covers the administrative area of Brighton & Hove including that part located within the South Downs National Park. This approach reflects CPP1 Policy CP22 which includes provision for an updated target to be identified through a revised

<sup>1</sup> Additional pitch requirements for Horsham District are currently being updated.

<sup>2</sup> The Mid Sussex District Plan has not allocated any G&T sites however it requires the provision of permanent pitches on its strategic sites. The first of which has been secured through the Planning Consent granted at the north of Burgess Hill for 13 pitches. The remainder are yet to be secured through a planning consent.



assessment of traveller accommodation needs, and further states that the Council will review traveller accommodation needs to cover the full plan period to 2030.

The revised assessment of need is set out in Table 3 below:

**Table 3 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that met the Planning Definition by year periods**

Years	0-5	6-10	11-15	Total
	2019-24	2024-29	2029-34	
Brighton & Hove LPA area	0	0	0	<b>0</b>
SDNP LPA area within Brighton & Hove	6	2	3	<b>11</b>

Following this reassessment neighbouring LPAs were again contacted for any changes in the previously stated positions, however there was no change in the previously stated positions, i.e. that they were not able to assist with any unmet needs arising outside their areas.

#### **Agreed Position Between all Parties**

1. There is a need for 11 additional pitches for households that met the planning definition of a gypsy and traveller within the South Downs National Park area of Brighton & Hove, and zero additional pitches within the city outside the SDNP.
2. No neighbouring authorities are currently in a position to assist with meeting the unmet requirement for 11 pitches originating from the SDNP LPA area within Brighton & Hove.
3. There are no available sites elsewhere in the South Downs National Park to assist in meeting the unmet requirement for 11 pitches originating from the SDNP LPA area within Brighton & Hove.

#### **Governance, Timetable for Review and ongoing cooperation**

Appropriate officers of each Party to this Statement will continue to liaise formally through correspondence and meetings as and when required. Formal consultation at appropriate stages of the plan making process will also continue.

Existing structures that facilitate regular strategic cooperation include:

<b>Group</b>	<b>Relevant Authorities</b>
West Sussex and Greater Brighton Partnership Board	Adur-Worthing, Brighton & Hove, Horsham, Lewes, Mid Sussex, South Downs
East Sussex Local Plan Managers Group	Brighton & Hove, Lewes, South Downs
East Sussex Strategic Members Group	Brighton & Hove, Lewes, South Downs



The Statement will be reviewed at each stage of the City Plan Part Two preparation, and whenever a material change of circumstance has occurred. Specific matters which could require updates of this SoCG include the following:

- Modifications to the Brighton & Hove City Plan Part Two resulting from its independent examination;
- Updates to evidence which shows changes in the pitch requirements or availability of potential sites.