



Horsham District Council & South Downs National Park Authority

Statement of Common Ground Part B

Horsham Local Plan 2037: Regulation 19

Signatories:

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Dated: 5 November 2021

8 November 2021

Statement

1. Introduction and Scope

- 1.1 This statement supplements the Statement of Common Ground Part A which forms the first part of this document. The purpose of this statement is to document the strategic cross-boundary matters that have been or are being addressed jointly by the parties, as necessary to demonstrate effective joint working, or to draw out areas of common ground that are specific or unique to the parties.
- 1.2 Horsham District Council acknowledge Section 62 of the Environment Act 1995, which makes its duty for all relevant authorities (including Government departments and agencies, utility companies and parish councils) to have regard to National Park purposes when coming to decisions or carrying out their activities. The National Park covers an extensive area and it has the highest national status of protection in regard to landscape (character, form and function) and scenic beauty. We acknowledge that development within the setting of national parks and other protected landscapes should be sensitively located and designed to avoid adverse impacts on the designated landscapes.
- 1.3 We will also look to work with our strategic partners to plan positively for nature and ecosystem services within and surrounding the protected landscapes within Horsham by developing and enhancing where appropriate the natural capital assets in the area in accordance with the principles outlined in People and Nature Network (PANN).
- 1.4 Horsham District Council supports in principle the proposed new draft revision to the National Planning Policy Framework paragraph 175¹ as proposed in response to the [Glover Review of protected landscapes](#). This states that the scale and extent of development within National Parks should be limited and that any development within the settings of National Parks and Areas of Outstanding Natural Beauty should be sensitively located and designed so as to avoid adverse impacts on the designated landscapes.

¹ Consultation on the draft revisions to the National Planning Policy Framework and a new draft National Model Design Code – 20 Jan 21 to 27 March 2021.

1.5 The matters dealt with in this statement are:

Section 2: Cross-boundary development needs (common ground agreed)

Section 3: Sites within the setting of the South Downs National Park (common ground agreed)

1.6 This statement has been produced in preparation for the Regulation 19 stage of the Horsham District Local Plan 2038 (HDLP). It is anticipated that this statement will be updated to relate to later stages of the Local Plan and changes in circumstance.

1.7 An earlier Statement of Common Ground between the parties was signed and published in April 2018 and is attached as Annex 1. The parties agree that the sections 1-3, 5 and 6 of Annex 1 remain valid as the agreed position. In particular, it is highlighted that Horsham is a district area of which approximately 18% falls within the South Downs National Park, which means that statutory planning responsibilities within the district are geographically split along the National Park boundary. Section 4 is concerned with addressing housing need and is updated by Section 2 below.

2. Cross-boundary development needs

2.1 The parties confirm that the supply of homes in the SDNP has met and in most years exceeded the National Park wide provision of 250 dwellings per annum, and evidence indicates that this will continue to be the case in future years. On that basis, the assessed annual unmet need in the SDNP within Horsham District continues to be no more than 5 dwellings per annum. Therefore, the parties agree that the unmet need arising from the SDNP is considered to be de minimis and readily absorbed into the above-target provision of homes in Horsham District outside of the SDNP.

2.2 The parties agree that the need identified for additional Gypsy, Traveller or Travelling Showpeople accommodation within Horsham District outside the SDNP is likely to be fully met by the emerging HDLP (i.e. to be met outside of the SDNP). The parties agree that there is no identified unmet need arising within the SDNP within Horsham District.

2.3 The parties agree that the needs identified for additional employment land within the respective areas of SDNP and Horsham District (outside of the SDNP) are likely to be provided for within their respective adopted and emerging local plans.

3. Sites within the setting of the South Downs National Park

3.1 The SDNPA has identified a number of sites which are proposed for allocation in the HDLP, which it considers may have an adverse impact on the landscape setting of the SDNP. The parties agree that as part of the preparation of the Regulation 19 HDLP, HDC has engaged with SDNPA and discussions held regarding the sites in question. The agreed outcome of these discussions is that the parties will continue to engage, and jointly seek to ensure that allocated sites potentially impacting on the setting of the SDNPA come forward in an appropriate, landscape-led manner to avoid adverse impacts on the setting of the National Park. This ongoing engagement will be without prejudice to the SDNPA's right to make representations on these sites, and without prejudice to HDC's decisions as to which sites are allocated (and ultimately granted planning permission), nor to its decisions on the wording of relevant policies in the emerging HDLP. Following further discussions, it was agreed engagement on particular sites on the edge of the national park will continue in parallel to the preparation of the Horsham Local Plan Review.

4. Shoreham Cement Works

4.1 The site of the former Shoreham Cement Works is located within the part of Horsham District (and a small part of Adur District) which is covered by the South Downs National Park. This site is allocated in

the South Downs Local Plan in policy SD56. This policy seeks to deliver the environmental restoration of the site through sustainable tourism and visitor based recreation activities, employment uses and further types of development (including new homes) where necessary. The South Downs National Park Authority has commenced the preparation of an Area Action Plan (AAP) in order to provide a robust policy framework for redevelopment of the site for an exemplar sustainable mixed use development. .

- 4.2 The parties agree to work together as part of the preparation of the AAP to ensure strategic matters common to both Local Planning Authorities are addressed. This will include consideration of the role the site may have in the context of the Coastal West Sussex and Greater Brighton sub-region.

5. Closing matters and further work

- 5.1 The parties to this statement 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, including with respect to prospective development sites potentially affecting the setting of the SDNP, and through sustained joint dialogue and the commissioning of joint studies as appropriate.