



Horsham / Arun District Council Statement of Common Ground

Horsham Local Plan 2023-2040

Signatories:

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Statement

1. Introduction and Scope

- 1.1 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: Other matters
- 1.3 This statement has been produced in preparation for the Regulation 22 submission of the Horsham District Local Plan 2023-2040. The statement will be updated as necessary to reflect circumstances.
- 1.4 Both Horsham District Council (HDC) and Arun District Council (ADC) have adopted local plans that are more than 5 years old, having adopted their current Plans in 2015 and 2018 respectively. HDC and ADC are in different positions in the reviews of their respective Local Plans. HDC has published a Regulation 19 Local Plan and representations were invited in early 2024. ADC has consulted on an Issues and Options or 'Direction of Travel' report under Regulation 18 and anticipates a further Regulation 18 consultation on a draft new Local Plan in 2025.

2. Housing need

- 2.1 The signatories agree that the main Housing Market Area for HDC is the Northern West Sussex HMA. The Northern West Sussex HMA covers the authorities of HDC, Mid Sussex District Council (MSDC) and Crawley Borough Council (CBC).
- 2.2 The signatories also agree that the main HMA for ADC is the Sussex Coast HMA. This covers the authorities of ADC, Adur District Council, Brighton & Hove City Council, Chichester District Council, Lewes District Council and Worthing Borough Council, as well as a large part of the South Downs National Park Authority. A small area of HDC also lies within this HMA.

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- 2.3 The starting point for HDC is to as far as possible meet its own needs based on the Standard Methodology. The standard housing method applies in Horsham District which is currently 917 dwellings per annum. However, in September 2021, HDC received a Position Statement from Natural England. This explained that it could not be concluded that water abstraction at Pulborough was not having an impact on the Arun Valley SAC, SPA and Ramsar Site, and that development must not add to this impact. To therefore be compliant with Habitat Regulations, all new development in Horsham District must at the current time be water neutral. This has resulted in a significant fall in planning permissions since late 2021, and an ongoing constraint on development coming forward in an HRA-compliant manner. Consequently, HDC's position is to submit a Local Plan housing target of 777 dwellings per annum (annualised average) which would mean that it is unable to meet its own full assessed housing need nor any additional housing needs from other areas including from within the Northern West Sussex HMA.

Arun District Council

- 2.4 The Arun Housing Needs Review (May 2023) concluded that the Standard Housing Method formula generates a minimum local housing need of 1,400 dwellings per annum. Given that ADC is at an early stage of their local plan review, they are not in a position to confirm whether any unmet need arising from neighbouring local authorities can be accommodated in Arun District.
- 2.5 Whilst understanding that HDC is taking an environmentally constrained approach, ADC takes the view that this gives rise to significant potential cross-boundary implications. It is considered that the Horsham District Local Plan should not regard water neutrality as an absolute constraint on housing supply, and that it should set out a commitment to deliver the identified housing need and contribution towards unmet need, as originally evidenced in the earlier versions of the emerging plan.

Joint statement on housing needs

- 2.6 Both parties acknowledge that the other has a history of working positively to address unmet needs in their primary HMA. Within the existing Horsham District Planning Framework (HDPF, 2015), an allowance of 150 homes per year is made for unmet needs in Crawley Borough. Similarly, the Arun Local Plan included an allowance of 1,500 homes to meet wider needs.

- 2.7 The parties agree that going forward, the priority for both authorities is to first address their own need, then the needs from their primary HMA prior to addressing needs arising from other areas.
- 2.8 The signatories are not, however, in agreement with regards whether the Horsham District Local Plan can accommodate its own assessed housing need in full, and additionally contribute to unmet housing needs from other areas. Notwithstanding these differing positions, the signatories agree that both will work positively on an ongoing basis to maximise plan-led housing supply within their respective areas towards meeting the assessed needs as far as possible, taking account of evidenced environmental constraints.
- 2.9 Both authorities recognise that that though they do not share a primary HMA, there is a relationship between both the North West Sussex HMA and the Coastal West Sussex HMA. Both authorities are committed to proactive participation in the West Sussex and Greater Brighton partnerships, or directly with other member authorities, towards addressing sub-regional unmet housing needs within this area.

3. Gypsy and Traveller Accommodation

Horsham District Council

- 3.1 HDC has a forecast need to accommodate 128 new households over its Plan period. The HDLP proposes to allocate 14 new sites or site expansions and 3 additional parcels of land within strategic sites to address the need. Whilst needs can be met in full for the first 10 years of the Plan period, there nevertheless remains an unmet need for 59 pitches across the entire Plan period. It is noted that this shortfall has mainly occurred as a result of the December 2023 change to the definition of a Gypsy or Traveller in the Planning Policy for Traveller Sites (PPTS).

Arun District Council

- 3.2 The evidence on the supply of pitches to meet Arun's Gypsy & Traveller needs, demonstrated that Arun would only be able to achieve this (taking into account unimplemented consents), via intensification within existing sites and allocating a broad location, to come forward towards the end of the plan period. The supporting evidence base and the sustainability appraisal, together, demonstrated that there are no new sustainable G&T sites achievable in Arun.
- 3.3 A decision to withdraw the Reg.19 Arun District Council Gypsy & Traveller Development Plan Document (G&T DPD) was made at Planning Policy Committee on 6 June 2024. This decision was taken in the light of the December 2023 change to the definition of a Gypsy or Traveller in the PPTS, which meant there was a real risk of the submission document being found unsound.

Joint statement on Gypsy and Traveller needs

3.4 As a consequence of the positions outlined above, it is understood respectively by both signatories that neither authority is currently in a position to assist in meeting the other's Gypsy, Traveller or Travelling Showpeople accommodation needs.

4. Other matters

4.1 It is agreed that there are no further strategic cross-boundary matters to be addressed between the parties.

5. Closing matters and further work

5.1 The parties to this statement agree 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 through sustained joint dialogue and the commissioning of joint studies as appropriate.