



Horsham  
District  
Council

**Horsham District Local Plan Examination**

# **Response to Action Point 5 Appendix A**

**Matter 1, Issue 1 - Legal and  
Procedural Requirements - Whether  
the Council has complied with the  
duty to co-operate in the  
preparation of the Plan?**

**HDC30a**

January 2025

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## 5. Stakeholder Engagement

### Introduction

- 5.1 ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual.
- 5.2 The aim of these interviews was to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.
- 5.3 Three interviews were undertaken with Council Officers from the study area.
- 5.4 As stated in the Planning Policy for Traveller Sites, Local Authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries (S.110 Localism Act 2011). In order to explore issues relating to cross boundary working, ORS interviewed a Planning Officer from 9 neighbouring local authorities:
- » Adur and Worthing District Councils
  - » Brighton and Hove City Council
  - » Chichester District Council
  - » Crawley Borough Council
  - » Mid Sussex District Council
  - » Mole Valley District Council
  - » Reigate & Banstead Borough Council
  - » Waverley Borough Council
- 5.5 Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.

### Views of Key Stakeholders and Council Officers in Horsham

#### Accommodation Needs

- 5.6 Since the last GTAA, Horsham have attempted to prepare a Gypsy and Traveller Plan, but it has not found general acceptance with refusals at committee and legal challenges to planning permissions.
- 5.7 Horsham have looked at a number of potential new traveller sites to meet the deficit in provision and produced 2 draft Development Plan Documents (April 2017 and December 2017). However, one of the key sites was withdrawn by the owner in April 2018, and the Council was therefore unable to meet the identified need for Gypsies and Travellers and take the draft document to Examination.

- 5.8 Current provision was felt to be working reasonably well, although it was accepted that there is a need for more pitches.
- 5.9 Since the last GTAA, Horsham have lost an appeal to Travelling Showpeople, therefore, permission has been granted for four plots, which meets the previous identified need. These plots have yet to be implemented.
- 5.10 Horsham have been speaking to developers, who are developing strategic sites. It was stated that Horsham will need elements on those strategic sites for Gypsy and Traveller provision. This was said to have led to the potential provision of 15 pitches on each of the strategic sites that are identified in the Local Plan Review.
- 5.11 There are a number of long-term unauthorised sites in Horsham district, where owners have not submitted planning applications.

## Short-term Encampments and Transit Provision

- 5.12 Horsham do not attract a great number of unauthorised encampments.
- 5.13 Horsham use the transit site in Chichester as a means of moving on unauthorised encampments. The site in Chichester has helped in reducing the number of unauthorised encampments witnessed in Horsham.
- 5.14 No need for any further transit provision was identified and it was thought that the site at Chichester is functioning well in meeting the need in the area.

## Cross Border Issues and Meeting the Duty to Cooperate

- 5.15 No specific cross-border issues were identified.
- 5.16 Horsham are complying with the Duty to Cooperate. They have appeared at numerous meetings over recent months with all their neighbouring authorities.
- 5.17 Neighbouring authorities are also complying with their Duty to Cooperate.
- 5.18 A number of neighbouring authorities were believed to be meeting their respective Gypsy and Traveller need. However, authorities located to the south of Horsham were believed to be experiencing difficulties meeting their need. It was thought that the locations are hampered by their proximity to the sea and the South Downs National Park. Brighton was named as a specific example.

## Future Priorities and Any Further Issues

- 5.19 A future priority identified was for Horsham to perhaps look to approve more small family sites. It was suggested that this type of sites are better maintained sites and more easily managed.

## South Downs National Park (SDNP)

- 5.20 With regard to **overall accommodation need** in South Downs National Park, the views of the officer interviewed were as follows:

- » South Downs National Park (SDNP) were said to be in an unusual position because they are made up of parts of a number of local and county councils. According to local planning evidence, SDNP consists of parts of 12 other local authorities, meaning SDNP covers a very large geographical area, spread out over four housing market areas.
- » In respect to Gypsy and Travellers especially, as SDNP are spread out over a large area, rather than taking the approach of doing a comprehensive national park wide assessment, they have worked with the respective local authorities to assess the needs within certain parts of the national park. However, some of the evidence base is now considered out of date.
- » SDNP have a Background Paper on Gypsies and Travellers which was used to form the Local Plan evidence base. SDNP also have a policy in their Local Plan which sets out their approach. The SNDP Local Plan was adopted in July 2019.
- » There is only 1 site in Horsham that encroaches into the SDNP and there are caravans in the area over the SDNP boundary. This Study has interviewed the people and concluded they are not Gypsies or Travellers.
- » Unauthorised encampments are dealt with as a civil enforcement matter. The stakeholder interviewed was not aware of many unauthorised encampments within the SDNP in Horsham.

<sup>5.21</sup> With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » SDNP were said to be complying with their Duty to Cooperate. They have worked closely with Horsham Council. No other specific cross-border issues were raised.

## Neighbouring Authorities

### Adur & Worthing District Councils

<sup>5.22</sup> With regard to **overall accommodation need** in Adur and Worthing, the views of the officer interviewed were as follows:

- » Adur have one public site at Withy Patch, Lancing, which has 12 pitches.
- » The Adur Local Plan (2017) covers the period 2011-2032 and makes provision for the 4 additional pitches required following the 2014 GTAA. The most recent GTAA (2019) indicates a need for an additional 6 pitches, coming from the site at Withy Patch, up to 2036. Taking into account the 4 pitches to be provided, there is a need to provide an additional 2 pitches.
- » Given the commitment in the Adur Local Plan (2017) to relocate and extend the current public site, it is considered that, currently, there is sufficient amount of accommodation to meet the need of Travellers that meet the planning definition.
- » Worthing have no pitches or plots, either permanent, unauthorised, tolerated or temporary.
- » Worthing have no identified need for Gypsies, Travellers or Travelling Showpeople.

5.23 With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » With regard to cross-border working, the officers were of the understanding that Gypsy and Traveller liaison officers across East and West Sussex meet regularly.
- » Adur and Worthing Councils were thought to be complying with their Duty to Cooperate through their close working with other local authorities. Neighbouring authorities were also said to be complying.
- » The officers for Adur and Worthing Councils believe that all neighbouring local authorities have sufficient policies in their respective Local Plans to meet any identified need.

## Brighton & Hove City Council

5.24 With regard to **overall accommodation need** in Brighton & Hove, the views of the officer interviewed were as follows:

- » In order to meet the identified need, Brighton and Hove opened a public site at Horsdean in 2016. Brighton & Hove have also undertaken a joint exercise with the South Downs National Park to try and identify more potential sites for the future.
- » The provision in Brighton and Hove was not thought to be meeting the strategic need identified in the last GTAA. Brighton and Hove are therefore updating their GTAA.
- » Unauthorised encampments predominantly occur during the summer months. However, the number of encampments has fallen since the opening of the transit site at Horsdean.
- » Brighton and Hove are considering negotiated stopping places to help accommodate the rise in unauthorised encampments experienced over the summer months.

5.25 With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » No specific cross-border issues with Horsham or any neighbouring authorities were identified.
- » Brighton & Hove, and its neighbouring authorities, were all felt to be complying with their Duty to Cooperate. This was believed to be achieved through maintaining regular contact across local authorities on potential issues concerning Gypsies, Travellers and Travelling Showpeople.

## Chichester District Council

5.26 With regard to **overall accommodation need** in Chichester, the views of the officer interviewed were as follows:

- » Since the last GTAA, Chichester have updated the policy in the local plan to outline the revised need and will start work on a new site allocation document at the end of 2019.

- » Chichester have a 13-year supply of Gypsy and Traveller pitches and a 5-year supply of Travelling Showpeople plots, based on the last GTAA.
- » The transit site which accommodates the whole of West Sussex is located within Chichester.
- » It was thought there to be a sufficient amount of accommodation. However, it was unsure whether the current provision was meeting the need.
- » There are few unauthorised encampments that occur. Those that do arrive do so during the summer and are quickly directed to the transit site.

<sup>5.27</sup> With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » No specific cross-border issues with Horsham or any neighbouring authorities were identified.
- » It was assumed that all areas are adequately dealing with their own need.
- » Chichester and its neighbouring authorities were thought to be complying well with their Duty to Cooperate. This was said to be evidenced through regular meetings and through the local plan of the last GTAA being praised for demonstrating good cooperation.

## Crawley Borough Council

<sup>5.28</sup> With regard to **overall accommodation need** in Crawley, the views of the officer interviewed were as follows:

- » There is a limited mix of temporary and permanent small family owned private sites in the north of the Borough. Most Travellers in the borough live in Bricks and Mortar.
- » There is one private, single family unit site for Travelling Showpeople.
- » The number of short-term encampments is low; there were no encampments between 2006 and 2014, and eight in 2016. It is thought that due to small size and urban nature of the Borough, Travellers are not attracted to the area as there are few suitable places to camp.
- » Between 2012 and 2014 the Borough Council carried out a GTAA. The study did not identify any immediate need for Gypsies and Travellers. However, it did identify a potential need for an additional 10 pitches for the children of families (i.e. new family formation) currently living in bricks and mortar, should they need a travelling lifestyle when forming their own new households<sup>7</sup> (due to the age profile of the Traveller's children this possible need was identified in years six to fifteen of the Local Plan). The Local Plan (December 2015) identified a reserve site for the potential future need of 10 pitches.

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<sup>7</sup> Just to note that the assessment and provision was undertaken on the basis of 'need' for accommodation including: "*Bricks and mortar households whose existing accommodation is overcrowded or 'unsuitable'. Unsuitable in this context can include unsuitability by virtue of proven psychological aversion to bricks and mortar accommodation*" (DCLG: Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007, para 15).

5.29 With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » The Borough is surrounded by a number of Traveller sites which are located in neighbouring Boroughs: Reigate and Banstead have a site near the airport; there is a Showpeople's site in Tandridge; and Horsham have a site to their west.
- » In 2011, the Gatwick Diamond authorities (which include Crawley, Mid Sussex and Horsham, Tandridge, Reigate and Banstead, and Mole Valley) agreed to meet their own need for additional Traveller provision. The authorities regularly meet up to discuss Traveller issues and share information.
- » Within Crawley's Local Plan is a Duty to Cooperate statement which covers Gypsies and Travellers and states that joint working needs to be undertaken.

## Mid Sussex District Council

5.30 With regard to **overall accommodation need** in Mid Sussex, the views of the officer interviewed were as follows:

- » Mid Sussex District Council completed a Gypsy and Traveller Accommodation Needs Assessment (GTAA) in 2016. This assessment identified a need for an additional 23 pitches in the district.
- » The authority is actively trying to bring forward a site that will provide 4 private pitches and 12 public pitches. These 16 pitches would meet a substantial amount of the need for culturally appropriate housing for those who did not meet the PPTS definition of 'Travelling' households' (the GTAA assessment did not identify any need for those that meet the PPTS definition). A planning application was submitted but was subsequently withdrawn and is likely to be resubmitted in the future. Overall, it is felt that the Local Authority has taken positive steps to meet the identified need and is looking at options to meet the residual need through the allocation of further sites and expansion of existing sites

5.31 With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » No specific cross-border issues were identified.
- » Mid Sussex were thought to be complying with their Duty to Cooperate through their close working with other local authorities. Neighbouring authorities were also said to be complying.
- » Neighbouring local authorities were believed to be coping well in attempting to meet their respective identified need.



## Mole Valley District Council

5.32 With regard to **overall accommodation need** in Mole Valley, the views of the officer interviewed were as follows:

- » The last GTAA identified a total need of 40 pitches and 3 plots during the period 2017-2033; with about 50% of the pitches and 100% of the plots being for households that meet the PPTS definition. Four additional pitches have been permitted since the GTAA baseline date. As there are no vacancies on existing sites which would contribute to the need, an unmet need of 36 pitches and 3 plots remains.
- » The last GTAA process also identified needs relating to concealed households and evidence has also been included with planning applications that reveals overcrowding on certain sites.
- » Mole Valley experienced an increased number of short-term unauthorised encampments during the 2018 travelling season, and the council are now engaged in discussions at County level about transit/stopping requirements.
- » The encampments appear to be seasonal travelling and are located primarily on parks, recreation grounds and public car parks within the north of the district. The District Council have worked with landowners and the Police to move the occupiers on, following an agreed protocol.

5.33 With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » With regard to cross-border working, while no specific issues were identified, informal officer-level discussions were said to frequently take place between Mole Valley and neighbouring authorities on issues relating to planning for Gypsies and Travellers.
- » Mole Valley were believed to be complying with their Duty to Cooperate through engagement with neighbouring authorities' GTAA processes and through Surrey-wide discussions on transit/stopping place provision. Neighbouring authorities were also said to be complying.
- » Neighbouring local authorities were believed to be making every attempt to meet their respective identified need.

## Reigate & Banstead Borough Council

5.34 With regard to **overall accommodation need** in Reigate & Banstead, the views of the officer interviewed were as follows:

- » Since the last GTAA, Reigate & Banstead Council has approved 19 permanent pitches. The examination of the Council's Development Management Plan (DMP) is complete; the Plan includes a number of gypsy and traveller site allocations with capacity to deliver approximately 24 further pitches over the next 10 years. The DMP was adopted in September 2019. The emerging DMP also includes site allocations capable of accommodating 5 additional Travelling Showpeople plots.



- » Overcrowding was identified as being present on the Kent's Field site, Rectory Lane, Woodmansterne. However, the Kent's Field site is one of the sites to be allocated for additional pitches in the DMP. In recognition of the overcrowding, 2 additional temporary pitches were granted on appeal in 2018.
- » The number of unauthorised encampments in Reigate and Banstead varies from year-to-year; with 2018 being particularly busy through experiencing 22 encampments. Quick enforcement responses are used to move encampments from Council-owned land.
- » There is currently no transit provision or agreed stopping places in the borough. However, work is ongoing at the County level to examine the need for a transit site across the county and identify potential sites in order to reduce unauthorised encampments.

5.35 With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » With regard to cross-border working, information sharing with neighbouring authorities regarding the movement of any encampments occurs often, including with the Kent County Council Intelligence Unit. Joint working is also ongoing across Surrey to consider need for county transit provision and to identify potential sites to meet any such need.
- » Reigate and Banstead were believed to be complying with their Duty to Cooperate through the joint working strategies set out in the Council's 2017 GTAA. Neighbouring authorities were also said to be complying.
- » Neighbouring local authorities were believed to be coping well in attempting to meet their respective identified need.

## Waverley Borough Council

5.36 With regard to **overall accommodation need** in Waverley, the views of the officer interviewed were as follows:

- » The Council is currently preparing Local Plan Part 2. This will identify and allocate sites to meet traveller accommodation needs set out in the latest version of the Waverley GTAA.
- » Officers were aware of issues of overcrowding on the public site and the private site at Lydia Park.
- » Short-term encampments usually occur over the summer months, around the time of the Derby and for large events like funerals. These encampments tend to be situated in the Farnham area via the A31 route which leads into Basingstoke.

5.37 With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » Officers did not identify any significant cross border issues, and one confirmed that they are not aware of any sites in neighbouring authorities which have any effect on Waverley.

- » One officer felt that, despite Waverley and the neighbouring boroughs complying with their respective Duty to cooperate, there still needs to be more cooperation with neighbouring authorities around the management of encampments. The officer explained that when encampments occur close to a neighbouring authority, they will often simply move them over the border and felt that this approach could be improved.