



Horsham District Council / Mid Sussex District Council Statement of Common Ground

Horsham District Local Plan 2023-2040

Mid Sussex District Plan 2021-2039

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 to support the Regulation 22 submission of the Horsham District Local Plan 2023-2040 and the Mid Sussex District Plan 2021-2039 respectively.

2. Housing need

- 2.1 For both councils, together with Crawley Borough Council, the principal Housing Market Area (HMA) is the Northern West Sussex HMA (NWSHMA). In addition, there are overlaps for both Districts with the Coastal West Sussex Housing Market Area (CWSHMA). There is agreement between the Northern West Sussex authorities that the ability for each of the three authorities to meet current housing need (both individually and for the primary HMA as a whole) is becoming more challenging, given environmental and infrastructure constraints.

- 2.2 Local planning authorities which principally fall within CWSHMA have indicated that they have unmet housing needs. In addition, some local planning authorities in Surrey have similarly indicated that they are unable to meet their full assessed housing needs.
- 2.3 It has been agreed between the NWSHMA councils that there should be a priority order for seeking to meet housing needs: firstly, address the authority's own need; secondly, address unmet needs within NWSHMA; thirdly, address unmet needs arising from CWSHMA; and fourthly, address other adjacent nearby HMAs. It is recognised that there may be reason to deviate from the priority order arising during the process of assessing the most suitable sites and locations for allocation and subject to joint consideration with the other NWSHMA councils.
- 2.4 A fuller context and more comprehensive set of jointly agreed principles is set out in the Northern West Sussex Statement of Common Ground and the Northern West Sussex (Housing Need) Statement of Common Ground (collectively the 'NWS SoCGs') which were last updated in July 2024, and which should be read in conjunction with this SoCG. The NWS SoCG (Housing Need) provides an updated position on projected housing supply in the HMA over relevant local plan periods, set against assessed needs. The respective positions of the signatories are however summarised below:

Horsham District Council

- 2.5 The starting point for HDC is to as far as possible meet its own needs based on the Standard Methodology. However in September 2021, HDC (together with a number of other authorities in North West Sussex) 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 proposed Local Plan housing target reflects that 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.

Mid Sussex District Council

The starting point for MSDC is to as far as possible meet its own needs based on the Standard Methodology. At Regulation 19 stage (Jan/Feb 2024), the Council's assessed housing need was 1,090 dwellings per annum. This totals 19,620 dwellings for the plan period 2021-2039.

In its Regulation 19 Submission Draft District Plan the Council demonstrated supply of 20,616 dwellings. This comprised of completions in the plan period to date, existing commitments, proposed site allocations and a windfall allowance. Therefore, the Council were proposing an over-supply of 996 dwellings. The Submission Draft District Plan sets out that this over-supply could serve as a contribution towards the unmet needs arising in the NWSHMA in accordance with the agreed priority order. This is set out in policy DPH1: Housing.

At Submission stage (July 2024) MSDC proposed a Main Modification to policy DPH1: Housing to reflect the latest housing need position reflecting updates to the Standard Method data in March

2024. Should this position be accepted by the MSDC Inspector through examination of the Plan, this would increase the over-supply position to 1,042 dwellings.

Common ground (housing need)

- 2.6 The signatories confirm that they have endorsed and signed the NWS SoCGs which provide the main evidence of how the Duty to Cooperate has been met including how both parties have engaged positively over time, and going forward, on the issue of unmet housing need.
- 2.7 The signatories agree that their respective proposed local plan housing requirements and supply are appropriate given current circumstances and constraints. It is further agreed that every opportunity will be taken to increase housing supply should opportunities (which are consistent with evidenced environmental constraints) present themselves within their Plan period. It is also agreed that there may be potential within both administrative areas to meet a greater proportion of unmet HMA needs in future local plan reviews and beyond the current local plan period.

3. Gypsy and Traveller Accommodation

- 3.1 The signatories have respectively undertaken Gypsy, Traveller and Travelling Showpeople needs assessments and undertaken site assessments with a view to meeting those needs. MSDC has identified a need for 16 additional pitches over the local plan period and proposes to accommodate the need in full through a combination of new site allocations on significant housing sites and existing commitments. HDC has a forecast potential 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. There remains an unmet need for up to 58 pitches across the entire Plan period. It is noted that the level of need has risen sharply during the Plan's preparation to take account of Government guidance on assessing need.
- 3.2 HDC has formally asked MSDC if they are able to assist with their unmet need given that the two authorities share a principal HMA. MSDC has noted that the request post-dates the publication of the submission draft MSDP, and that there is insufficient suitable supply to be able to assist with unmet need arising in Horsham District.
- 3.3 The signatories acknowledge that HDC maintain their representation that additional pitch allocations should be made on two of the three significant sites being allocated in the MSDP towards addressing the unmet need within the HMA. MSDC's position is that whilst they can meet their need, there is limited or no opportunity to further increase the supply at this late stage of the Plan making process. The signatories nevertheless agree that these points can be considered through the public examination in light of further detailed scrutiny of the evidence, and do not undermine HDC's overall support for the MSDC Local Plan strategy.

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 signatories note representations respectively made on each other's Regulation 19 Plans and acknowledge that this statement, whilst demonstrating that the Duty to Cooperate has been properly undertaken, does not prejudice those comments being given due consideration at examination.
- 5.2 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.