

## DUTY TO COOPERATE STATEMENT OF COMMON GROUND

BETWEEN: Horsham District Council and the South Downs National Park Authority

DATE: April 2018

### 1. Introduction

1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between Horsham District Council and the South Downs National Park Authority (SDNPA). It sets out the position and understanding with respect to key relevant duty to cooperate matters, and agreed actions to resolve outstanding matters. It is not binding on either party but sets out a clear and positive direction to inform ongoing strategy and plan-making.

### 2. Context

2.1 Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as HDC, to have regard to the purposes of national parks. These are:

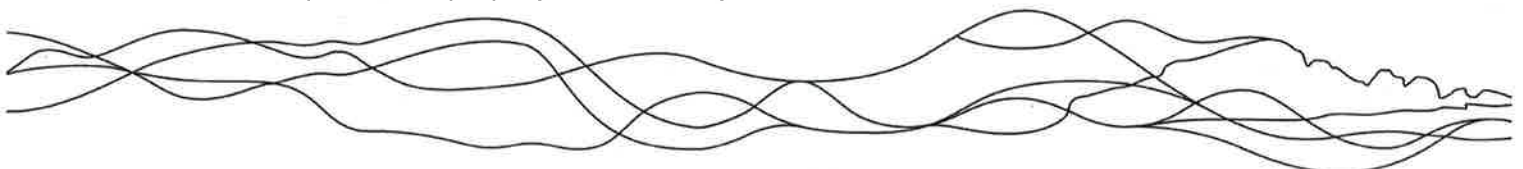
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
- To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

2.2 As a National Park and Local Planning Authority, plan-making for the SDNPA is subject to the National Planning Policy Framework (NPPF) whereby Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in the NPPF indicate development should be restricted. An example of such restrictions given in footnote 9 on page 4 of NPPF is policies relating to the development of sites within a National Park.

2.3 Furthermore paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads. It should also be noted that the DEFRA UK Government Vision and Circular 2010 on English National Parks and the Broads, referenced in the NPPF at this point makes clear that the Government recognizes that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them.

2.4 Horsham is a district area of which approximately 18% falls within the South Downs National Park. This means that statutory planning responsibilities within the district are geographically split along the National Park boundary. The South Downs Local Plan (SDLP) will supersede the Core Strategy and General Development Control Policies 2007 when adopted.

2.5 Both local authorities fall partly or wholly in the Northern West Sussex Housing Market Area (NWSHMA). The two authorities work in partnership to ensure that strategic planning issues are properly and holistically addressed.



### 3. Purpose and objectives

- 3.1 The SDNPA is preparing its first Local Plan – the South Downs Local Plan (SDLP). The SDLP is a landscape-led plan, with ecosystem services (the provision of goods and services arising from natural capital) at its heart. The SDLP will provide a comprehensive development plan document to cover the whole of the National Park, and will include a policy to address all types of development, with the exception of minerals and waste.
- 3.2 The purpose of this SCG is to demonstrate clearly and concisely how strategic cross-boundary matters relevant to the SDLP, which are specific to the two authorities, have been and will continue to be jointly addressed. These focus on the issue of addressing objectively assessed housing need, and on how points of disagreement between the parties are being positively resolved. Further detail is given in the South Downs National Park Duty to Cooperate Statement, and in the jointly prepared documents referred to below.

### 4. Addressing housing need within Horsham District

- 4.1 It is agreed between the parties that the housing supply and objectively assessed need for the district both within and outside of the South Downs National Park, is as set out in Table I below:

**Table I Housing supply and need in the Horsham part of the South Downs National Park**

	A	B	C	D	E	F	G	H
HMA / District area	SDLP housing provision (total) <sup>1</sup>	SDLP housing provision (A divided by 19 years)	OAN inside SDNP <sup>2</sup>	Unmet need inside SDNP <sup>3</sup> (C minus B)	Local Authority Local Plan provision (area outside SDNP) <sup>4</sup>	Local Authority OAN per annum (whole area) <sup>5</sup>	Total annual over-supply by L.A./HMA <sup>6</sup> (B+E-F)	Total annual unmet need by L.A./HMA <sup>6</sup> (B+E-F)
Horsham	85	4	9	5	800	659	145	-
<b>Northern WSx HMA</b>	<b>120</b>	<b>6</b>	<b>14</b>	<b>8</b>	<b>2104</b>	<b>2210</b>	<b>-</b>	<b>100</b>

<sup>1</sup> SDLP & NDP housing allocations (discounted by 10%) plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

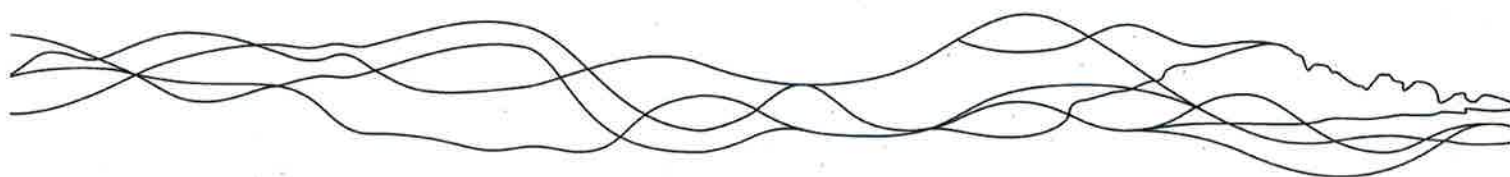
<sup>2</sup> South Downs HEDNA 2017 (Table 4)

<sup>3</sup> The difference between SDNP OAN and SDNP annualised provision (previous two columns)

<sup>4</sup> Housing provision targets based on Horsham District Planning Framework (adopted November 2015) and Mid-Sussex (Main Mods stage) and Crawley local plans

<sup>5</sup> Taken from the most recent SHMA or HEDNA. As the Horsham OAN (650dpa) does not include the area within SDNP, the OAN inside SDNP as stated in the South Downs HEDNA 2017 (9dpa) has been added.

<sup>6</sup> This is the difference between the total provision and the total OAN, for the whole area (both within and outside SDNP).



4.2 The South Downs Housing and Economic Development Needs Assessment (HEDNA) (September 2017) estimates the unmet housing need within the National Park, broken down by district and by HMA (Table 5). The annual unmet need in the Horsham part of the National Park is **5 dwellings per annum** (a total of 95 dwellings over the Plan period).

4.3 Based on the above evidence, both parties confirm that the figure for the objectively assessed housing need for Horsham includes the communities within the National Park which fall within the District, and therefore these communities' housing needs will be met through the provision of housing through both the Horsham District Local Plan and South Downs Local Plan. At a District level there is no unmet need.

5. Addressing wider housing need

5.1 Whilst Horsham District relates primarily to the Northern West Sussex HMA, both parties acknowledge that there is also a shortfall of housing in the neighbouring coastal West Sussex area, caused in particular by the current inability of Brighton & Hove, and some of the other coastal authorities, to meet their own needs. The level of unmet need is high and both authorities are taking steps, with neighbouring authorities and those in the sub-region, to address the issue. The scale of the issue requires a sub-regional response.

5.2 Both parties are participants in the West Sussex and Greater Brighton Strategic Planning Board which is addressing the issue of unmet housing needs in the coastal area through the Local Strategic Statement 3 (LSS3).

6. Shoreham Cement Works

6.1 HDC and the SDNPA are in agreement over the need to bring forward the restoration of this site and are keen to work together on the preparation of an Area Action Plan for the site (as set out in Strategic Site Policy SD56). This work will need to include consideration of the potential impact of proposals at Shoreham Cement Works on the neighbouring settlements, such as Steyning and Upper Beeding.

6.2 SDNPA has started work on the AAP, commissioning consultants to provide baseline reports / surveys. This evidence base and early drafts of the AAP will be shared with HDC at the appropriate time.

Signed on behalf of Horsham District Council



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Date 10 April 2018

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