



Horsham  
District  
Council

# Horsham District Local Plan Examination

## Matters, Issues and Questions

Matter 10: Monitoring and Review

Issue 1

November 2024

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# Matter 10, Issue 1: Whether the plan would be able to be monitored effectively to ensure timely delivery and trigger the need for review?

## Question 1: How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to progress?

1. The Council has traditionally monitored the implementation of local plans through the review and updates of the **Authority Monitoring Report (AMR)**, which are published annually on the Council's website<sup>1</sup>. This is a process the Council already uses successfully for the Horsham District Planning Framework (HDPF) and therefore proposes rolling forward. It is recognised that the Plan does not make clear the relationship to the AMR, and the Council therefore suggests a modification (**SM63 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) to the Plan to include a **Monitoring Framework** (Appendix 1 of this paper) which would be used to assess the effectiveness of the Plan's policies in achieving the objectives outlined.
2. The AMR would either show that a particular monitoring target is being met or that indicators show the Council is moving towards meeting it and, therefore, the policy is working successfully or, where policies are not working as expected, will show that indicators are consistently not being met to allow action to be taken to ensure Plan policies are being implemented.
3. In the event that development sites are not progressing as expected there are a number of mechanisms the Council would employ:
  - Engagement (email, phone calls or face-to-face meetings) with site promoters or, where known, site developers to gather insights in the reason for lack of progress and act as a facilitator where appropriate,
  - Regular forums to allow developers, agents and promoters to engage with the Council directly and where reasons for lack of progress can be discussed and resolutions sought,
  - Close working with the Council's Development Management team to facilitate site progression, as well as agencies responsible for delivery of key elements of site, such as West Sussex County Council (WSSCC) for education and highways, the NHS for health infrastructure, and the Environment Agency, Natural England and Historic England for liaising on environmental issues.
  - Engagement with neighbouring authorities where trends in delivery delays can be discussed, ideas for facilitating delivery can be shared and region-wide issues can be addressed,
  - Engagement with Homes England in its role as the government's homes accelerator, or exploration of forms of funding or other plans or programmes available to support development,
  - A review of the Plan, specific policies or supporting or supplementary planning documents where a specific issue is identified that can be addressed this way.

## Question 2: How would the implementation of the Plan be monitored? Would it be effective? How would the results of any monitoring be acted upon? What would trigger a review of the Plan or specific policies within it? Are main modifications needed to the Plan to reflect this?

4. The Council recognises the importance of effective and meaningful monitoring in order to ensure the Plan policies are successful meeting the Plan's objectives. It has a strong track record of consistent and effective monitoring in the form of the **AMR** (see footnote 1). This has been published on an annual basis against HDPF objectives, indicators and policies, and enables the effects of Plan policies to be monitored, allowing the Council to respond quickly where these may not be working as anticipated. The Plan's performance against AMR indicators, which themselves are reviewed and updated over time

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<sup>1</sup> <https://www.horsham.gov.uk/planning/planning-policy/authority-monitoring-report>

taking account of changes in circumstances, will act as a trigger for review of policies which may not be performing as expected.

5. Reviews at least every five years are a legal requirement for all local plans (**Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012**). National Planning Policy Framework (NPPF) **Paragraphs 31, 32 and 33** establish the framework for the review of Local Plans. Local authorities are expected to be informed by relevant and up to date evidence. It also states that a review of strategic policies will be required should the local housing need figure change significantly or is expected to do so will in the near future. Given the unprecedented constraint that water neutrality has placed on the District's ability to bring forward levels of development close to a scale delivered historically, the Council considers it may be appropriate for a change in the legal requirements around water neutrality to trigger an early review of the plan which should be focused on housing supply and attendant issues. This can be dealt with through the modifications process but would involve a new strategic policy setting out the specific parameters for action and a proposed timeline. Assuming the revised NPPF will be in place during the course of the examination it is suggested that any mechanism awaits its publication.

### Question 3: Overall does the Plan deal adequately with uncertainty?

6. The Plan has been prepared in the full knowledge that there is a level of uncertainty in plan making, both as outcomes become less certain over time as the Plan Period progresses and because, ultimately the Council is not directly responsible for the delivery of many of the indicators, such as housing, facilities and other infrastructure. This uncertainty is reflected in a number of sections of the document (e.g. **paragraph 4.9 and 4.20** in relation to unmet need and water neutrality, **paragraph 4.24** in relation to the Gatwick Airport Northern Runway Development Consent Order and **paragraph 10.13** in relation to the potential to revisit unmet housing need in the future should circumstances around water neutrality change). The level of certainty can be maximised through well-evidenced, clear and positive development management and strategic policies, which the Council considers are contained within the Plan. These ensure that developers and other interested parties can be clear about where development will be accepted, what type of development, and how constraints and opportunities are expected to be dealt with.
7. Policies in the Plan have been written with the intention of providing this clarity to help facilitate proposals coming forward, while also recognising the need for some flexibility to allow the Plan to respond to changing circumstances locally, regionally and nationally. The Council's view is that the Plan strikes an appropriate balance.
8. The Monitoring Framework sets out a basis for assessment of the Plan's performance through the Plan Period against indicators, the progress being made towards the Plan's objectives and will signal when a change in the Plan's circumstances mean a review of the policies is required. These indicators consider, among others, statistics on housing delivery, strategic site delivery, the impact of affordable housing policies on the Housing Register, as well as environmental indicators such as the condition of landscapes, the number of permitted applications impacting designated habitats, performance against UK air quality objectives and water consumption.

