

## HORSHAM DISTRICT ASSOCIATION OF LOCAL COUNCILS (HALC)

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26th February 2023

Councillor Claire Vickers, Leader of Council,  
Jane Eaton, Chief Executive Officer,  
Horsham District Council

Cc: Barbara Childs  
HALC Members

By email

### **HALC Response to Local Plan Delay**

Dear Claire and Jane,

On Wednesday evening we held our quarterly HALC Meeting and following our discussions I have been given a mandate from my fellow Parish and Neighbourhood Councillors to write to you as the Chairman of HALC.

Firstly, thank you both for your responses to my email as Chairman of Henfield Parish Council. These responses provide greater clarity but may I observe that if some of this information had been communicated to us when the decision was made to defer the Local Plan progression to Reg 19, it would have helped all of us to understand the rationale behind the decision, whether we support it or not.

For the benefit of my HALC Colleagues who will be reading this without sight of our email exchange the points made can be briefly summarised by saying that, Jane confirmed that in taking the decision to delay bringing the Regulation 19 document forward to Full Council the Cabinet did not breach established Governance procedures.

Claire advised that the pause in the Local Plan will allow the District Council to fully understand the new Parliamentary Bill, to see if it allows us to reduce housing numbers still further and to allow time for further discussions with our communities. It is agreed that water neutrality currently acts as an inhibitor against speculative applications and that we agree on the importance of ecology and climate change. Appeals are also currently taking around 10 months to come before an Inspector so the District Council should have sufficient time to reach Regulation 19 with awareness of the further changes to the Local Plan that might be permitted.

I could spend some time challenging some of the statements made, particularly around the importance of ecology and climate change where the adoption of the new plan would have strengthened our policies significantly, but I think it best to look forward at what we might do to reduce some of the risks resulting from this delay and at how we might better prepare ourselves to ensure that we stop these delays in moving our Local Plan forward.

During our HALC Meeting we discussed some actions that our Members felt strongly should be taken forward and I want to ask for your support and agreement move these forward.

### **Neighbourhood Plans ready to move to Referendum**

Four of our member parishes, Cowfold, Itchingfield, Lower Beeding and Pulborough have been waiting patiently to move their Neighbourhood Plans to Referendum so they can be made. This delay has been caused as a result of consideration for the impact of water neutrality.

A great deal of work has gone into the production of these plans and respecting that work please can the District Council now make strenuous efforts to allow these Plans to go to referendum on 4th May 2023. It would make absolute sense to ask our residents to vote on these matters at the same time as they are voting in the local elections. This would save cost but more importantly move these parishes closer toward a made Neighbourhood Plan with an increased level of protection and the benefit of the higher rate of CIL payment for their communities.

### **Transparency, Consultation and Communication with our Parish Councils**

The one area that your responses failed to address in my email to both of you was the lack of transparency which, whilst it may be procedurally correct, fails to recognise the exclusion of many District and Parish Councillors who are elected to represent their communities from the consultation and decision making process.

This situation has been exacerbated by the absence of any consultation or visibility of what is colloquially known as the latest "Secret" Local Plan and any understanding of what has changed from the Draft Local Plan that we last saw. All we know from Jonathan Chowen's comments in November 2022 is that the housing numbers have reduced from 1100 new homes per annum to 800 and that for the first five years the target will be 600. We were also told that some of the strategic sites would not be included because of their higher impact upon water consumption. We also know that the new HDPF policies will be strengthened, in particular in the criteria relating to Climate Change and Ecology and we should remember that a delay in the Local Plan also leaves our policies and the bars that they set weaker than they need to be.

At our HALC Meeting our Members, with one exception, said that they are unaware of what changes had been made between the Draft Local Plan and "Secret" Local Plan and which sites had been subtracted or added. The one exception appears to be Storrington & Sullington Parish who stated at our meeting that they have been advised of which three sites have been added and where they are. Furthermore we understand that a discussion has been arranged with Officers at Horsham District Council to discuss the rationale for including these sites rather than others which the local community might prefer.

This is a clear example of a lack of transparency leading to an inconsistency across the district.

It would be much fairer to the Parishes and to those Districts Councillors who were excluded from the process if the proposed sites and any proposed changes were revealed now.

By communicating this information now we could work together to agree some site prioritisation which could be used in the event that target numbers are reduced further. This should allow us to move to Regulation 19 faster, hopefully with less objections registered to the Examining Inspector.

In any event we should not have one parish being treated differently to others and we would ask that as a minimum, whatever information is being shared with Storrington & Sullington is replicated with each of our Parishes.

## Regulation 19 Delay: Success Criteria

As I have stated the decision to delay is made and we now need to move forward but I wanted to share the results of a straw poll that I took from our HALC Members on Wednesday evening. Here are the three questions that we asked and their responses. I share this for transparency and to give you some insight into what the 29 Members who attended that meeting felt so that those views might be considered as we move forward. Those who were uncertain felt that as we had no plan to consider it was difficult to form a judgement which in itself is a statement.

QUESTION	YES I Agree	NO I don't agree	UNSURE
1. I think it is helpful that HDC have deferred making any decision on their new Local Plan later in 2023	31%	58%	12%
2. I would have liked to have seen the new Local Plan moving forward into Regulation 19 without further delay	65%	23%	12%
3. I don't believe that HDC needs a new Local Plan	12%	54%	35%

Time will tell whether the decision to delay the move to Regulation 19 was correct or not. We note that 83 homes have been granted in Billingshurst on Appeal, overriding the Neighbourhood Plan, including a water neutrality scheme and without a 5 year housing supply the Inspector weighted the decision in favour of the developer. The absence of even a draft Local Plan was a factor.

Since becoming Chairman of HALC two years ago I have now seen three new Leaders and two CEOs. My messaging has been consistent throughout. We, as Parishes want to work together with our District Council colleagues to achieve the best outcomes for our residents. This can only be achieved with effective consultation, communication, transparency and trust. During this period there has certainly been an improvement but sadly the decision on the Draft Local Plan which was taken in secret, suggests that we have yet to convince everyone that we are actually on the same team.

I look forward to receiving your responses to the specific requests concerning Neighbourhood Plans and revised allocated sites. Alternatively I am very happy to discuss the points made online via Teams or in person.

Kind regards,

Malcolm Eastwood  
*Chairman, Horsham Association of Local Councils (HALC)*

