



Development Management Peer Review

Horsham District Council

28 – 29 February 2024

Feedback Report



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1.0 Executive Summary

- 1.1 This report presents the findings of a peer review of the planning service at Horsham District Council. The review was organised at the request of the Council by the Planning Advisory Service (PAS) and Local Government Association (LGA), it was undertaken on site between the 28th and 29th February 2024. Meetings with locally elected members and officers unable to attend in person were also held online prior to the on site visit.
- 1.2 The Development Management service provided at Horsham is generally very positive. Performance, as currently measured by central Government is very good and the officers and managers are well respected both internally and externally for their professional approach and general efficiency. The emerging Local Plan is clearly linked with the Council Plan and is being given a high priority by the senior leadership team at the council.
- 1.3 Development Management staff are well supported with a knowledgeable and stable management team who take career progression and personal well-being very seriously. Training budgets are available to support staff to progress internally within the organisation and staff are encouraged to do so. Most of the teams are working well with some areas of exemplary practice and these teams are backed up by a well-resourced support team who provide a good service to administrate the planning applications and related work. However, there is a key weakness in the operation of the Applications Teams where workloads are particularly high with evidence of inefficiencies and bottlenecks forming.
- 1.4 A common issue across the Development Management service is inconsistency of approach by officers. Many officers have an exemplary, customer-focused attitude, but we were informed that others are not so effective and the same is true also for approaches to procedures such as speed of determination and gaining agreement for extension of times. The Government is currently consulting on changes to performance targets and, if introduced, will put the council in significant danger of designation if changes in practice do not take place. Allied to this is the council's approach to meeting the Planning Guarantee targets; at present the council could face a significant budget pressure if rules over the Planning Guarantee are not followed.
- 1.5 Performance in terms of speed of decision-making is significantly hindered by Horsham's water neutrality constraints. This issue has skewed performance and has meant officer time has had to be diverted from mainstream Development Management business. It appears that resolutions are being found, but this issue will continue to affect the council for some time. Therefore, whilst the Development Management service appears to have sufficient staff to deal with current workloads, the unresolved water neutrality issues are likely to continue to create workload and performance pressures without the introduction of a new approach.
- 1.6 The council's relationships with the local community and the development industry are very good. There is a very healthy respect between district councillors and officers and this is also largely extended to parish councillors and neighbourhood forums. Development Management also largely has a good relationship with the development industry and other partners. However, there are areas both internal and external to the council where there could be improvements to the joined-up approach to decision-making and this is particularly apparent for council-promoted schemes.
- 1.7 Communication is sometimes a problem, particularly between the Planning professionals and the general public and further quick wins can be achieved to enable the community to be better engaged in the Planning process.

- 1.8 Development Management staff have a good set of guidance to carry out their roles, however, there are a number of inefficiencies that create unnecessary frustration both between officers and between the customers of the Development Management service. We were told that the software is creating inefficiencies and regular double-handling of information. The pre-application service is not prioritised by staff and is poorly used by applicants. The free duty officer service is not meeting the expectations of either the council or the public and is a drain on staff resources. Finally, there is an issue with the speed in which legal agreements, such as S106 agreements and enforcement notices, are drawn up and this is causing a delay in the decision-making process.
- 1.10 Overall Horsham's Development Management service performs well in comparison to other councils in England, but there are key areas of weakness both within and outside of the council's control. If these areas of weakness are not addressed then the overall performance, resources and reputation of the council will suffer in the coming years.

2.0 Key Recommendations

2.1 The table below sets out the key recommendations from our review. Further detail on each can be found in the main body of the report.

R1	<p>The senior management team to raise awareness with the wider staff team of the corporate values and priorities of the council and how this can be embedded into their Planning roles. The corporate values and priorities are not clearly understood by all staff even though the Local Plan and Development Management function is central to the council achieving the objectives in the Council Plan. We suggest that the senior management team should make further efforts to embed these values and priorities across all staff in the service.</p>
R2	<p>Review the current programme of councillor training on Planning matters as part of the wider Planning Committee review. An opportunity exists with changes in the Planning Committee process for officers and councillors to work together on a comprehensive and engaging programme of training that engages both the remaining members of Planning Committee and ward councillors who engage in the Planning process as champions for their local constituents.</p>
R3	<p>In the immediate term introduce a set of quick wins to clear through the backlog of cases held in officer and manager caseloads. Efficiencies in the process for signing off decisions must be addressed as a matter of urgency, but it will require a longer term strategy (R4 below) to improve the efficiency of the Applications Team. Immediate measures taken could include:</p> <ul style="list-style-type: none"> • Widen sign-off of applications to a larger pool of senior officers (including managers in other teams). • Re-allocate as many applications as possible away from the three managers in the Applications Team to enable them to address the backlog of sign-offs. • Set up an interim approach to considering amendments to accelerate decision-making. • Temporarily reduce phone access to officers (2 to 3 hours per day) to increase capacity to clear through cases – this needs to be publicised and monitored to check officers are answering calls. • Use early checks of cases to identify applications that do not need amendments and therefore can be fast-tracked to a decision. • Take more calculated risks on minor, non-contentious applications where only minor issues are identified to enable quicker sign-off to accelerate decision-making.
R4	<p>In the longer term look at a number of measures including a review the structure of the DM Service to maximise management resources available and the spread of experience and caseloads. This will help managers focus their attention on management tasks rather than dealing with a high caseload and offer better support to staff in the Applications Team. In particular, a restructure of Development Management should consider:</p> <ul style="list-style-type: none"> • Focusing management time on improving the throughput of applications rather than dealing with their own caseload. • Reviewing caseloads across the whole service to ensure a better balance of casework, management and staff resources across Development Management. • Providing the support, training and development needed to more junior staff so that they have the confidence to make defensible decisions in a timely way and get involved in more complex cases. • Taking a calculated risk approach to decision-making, particularly for minor, non-contentious applications. • Agreeing a consistent approach to negotiation and amendments with officers.

	<ul style="list-style-type: none"> • Developing an agreed approach to managing water statements and water neutrality issues on minor non-major applications following on from the workshop that has already taken place • Upskill staff to better understand specialist information on small applications to relieve pressure on internal teams and allowing them to focus on more complex issues.
R5	<p>Carry out a process review of the use of extensions of time across all application types, linked to a new casework management framework. This process review should be informed by new Government regulations on extension of times and should set clear ground rules for how they are used by all case officers. It should ensure that they are used in a customer-focused way (for example not at the point of issuing the decision) and should pay particular attention to ensuring that no application will breach the Planning Guarantee time limits. Very importantly the ground rules should be agreed upon with the input of all relevant staff who contribute to the decision-making process.</p>
R6	<p>Carry out a review of the existing Planning software arrangements so that a decision can be made promptly on whether to rectify the current inadequacies with the existing UNIFORM and Enterprise systems or migrate to an alternative software provider. This decision and the implementation of the software changes should be included on the council corporate risk register due to the potential risk of not moving forward on this matter. The potential risk of inaction will not only be inefficiencies within Planning, but the council not meeting its statutory obligations on the public accessibility of Planning information.</p>
R7	<p>Prepare simple guides to Planning at Horsham, with associated training where appropriate. We suggest versions for residents, district councillors and parishes clearly aimed at the audience with information on what they need to understand about the process and where they can input into the system. It should cover the basics of Planning in plain English alongside advice and guidance on how to access Planning advice at Horsham. This should be accompanied by guidance and training for officers to ensure that they are writing correspondence with the audience in mind and avoid Planning jargon for non Planning professionals.</p> <p>The guide should, wherever possible, use the website to ensure that it reaches as wide an audience as possible and be updated when needed. The use of a questions and answers section has been used by many councils and it is recommended that this is used to supplement the guide.</p>
R8	<p>Review the council's Statement of Community Involvement and Customer Service Charter to ensure that the new administration is involved in shaping changes to the documents and there are clearly understood expectations from the community on how to engage with the Development Management service. The council has a clearly laid out Statement of Community Involvement and a Customer Service Charter. However, not all community representatives or officers are either aware of the documents or follow the standards set. Therefore, it is important that these are either reviewed and consulted on; or there is more attention given to ensuring all concerned understand and adhere to the commitments. It is also an opportunity for these standards to be realistic and achievable. This could be through a combination of training and, in the case of officers, monitoring of performance (for example by monitoring the way officers respond to telephone enquiries).</p>

R9	<p>Create a more formalise group to better engage with local communities. The council does meet with parishes, but this does not appear to be that well used. The Local Agents Forum is popular with local agents and a similar format could be used to encourage greater engagement with parish councils and neighbourhood forums. This should foster even better relations with the parish councils and neighbourhood forums, provide a structured format for community representatives to engage with the Planning process and help Planning reflect and review the way it manages the Planning process.</p>
R10	<p>Better use the Local Agents Forum to help Planning improve the service it provides and ensure local agents are taking an active role in these improvements. The Local Agents Forum is popular and appreciated by local agents. Some of the best performing councils use their Local Agents Forums in a more pro-active way to drive improvements, for example, local agents could help to reduce the currently unacceptable percentage of invalid applications received by Development Management.</p>
R11	<p>Establish a cross-council senior manager forum to help drive key Council Plan priority projects. The forum should include key decision-makers from the departments who are most involved in the regeneration projects in Horsham and who can help unblock issues that might arise. Therefore, we suggest this involves the senior Planning managers, housing and economic development as the core group of managers alongside other senior managers to participate if required on a project-by-project basis.</p> <p>This forum, or a separate meeting if preferable, should also be used to enable a better understanding between the council and external bodies on key issues that are creating impediments to delivery. We suggest that the key priorities at present are water neutrality and highway matters.</p>
R12	<p>Re-establish the Registered Providers Forum to allow Registered Providers and Horsham officers to help deliver key affordable housing in the district . The forum should enable Planners and housing officers to meet with the Registered Providers operating in the district and help to unblock impediments to delivering affordable housing. This may include issues that Registered Providers identify that are hindering the progression of affordable housing projects and also for Planners and Housing officers to help Registered Providers forward plan future affordable housing projects.</p>
R13	<p>Review the current pre-application offer using the PAS pre-application guidance and Planning Performance Agreements (PPAs) and agree on a clear direction that the council wants to take with pre-application advice. The council focuses on negotiating live planning applications and does not meet its performance targets on pre-applications. Therefore, it is poorly used and income is low. The council needs to reset its approach to pre-applications by either prioritising the service and incentivising applicants to use it, or significantly reduce its performance targets and lower customer expectations of the service it will offer.</p>
R14	<p>Remove the current free duty officer service and replace it with better web-based signposting and a paid for pre-application service. The current free duty officer service is resource-intensive and is not being used by residents in the way it was intended. Much of the advice provided can be provided through the Planning Portal and additional advice could be obtained through a paid for service.</p>
R15	<p>Consider ways to improve the efficiency of preparing key legal documents that are critical to the Planning decision-making process such as S106 agreements and planning enforcement notices. There is increased Government pressure to speed up the process of Planning decision-making and this has been outlined in the Government consultation document An Accelerated Planning System.</p>

	Opportunities such as Service Level Agreements with Legal could be considered to speed up the preparation of legal documents.
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3.0 The Peer review approach

The Peer review team

3.1 Peer reviews, often referred to as peer challenges, are delivered by experienced elected councillors and officer peers. The make-up of the peer team reflected the focus of the peer review and peers were selected based on their relevant expertise. The peers were:

- **Councillor Liz Green**, Planning Committee Chair, Royal Borough of Kingston
- **Mark Cassidy**, Chief Officer – Planning and Climate Change, Lancaster City Council
- **Liz Hobden**, lead officer peer and Principal Consultant, PAS
- **Peter Ford**, Peer Review Manager and Principal Consultant, PAS

The Planning Advisory Service (PAS)

3.2 PAS is an LGA programme funded primarily by a grant from the Department of Levelling Up, Housing and Communities (DLUHC). It is our principal mission to ensure that local planning authorities (LPAs) are continuously improving in their execution and delivery of planning services.

3.3 To achieve this, the PAS work programme focuses on:

- Helping local government officers and councillors to stay effective and up to date by guiding them on the implementation of the latest reforms to planning.
- Promoting a 'sector-led' improvement programme that encourages and facilitates local authorities to help each other through peer support and the sharing of best practice.
- Providing consultancy and peer support, designing and delivering training and learning events, and publishing a range of resources online.
- Facilitating organisational change, improvement and capacity building programmes - promoting, sharing and helping implement the very latest and best ways of delivering the planning service.

3.4 PAS also delivers some of its services on a commercial basis including change and improvement programmes for individual and groups of planning authorities.

Scope of the review

3.5 The aims of this review were developed following initial conversations and correspondence with Horsham District Council as well as consideration of background documents. They are to:

- To review the consistency of approach across the Planning teams to the vision and leadership that is set through the Council Plan and the senior leadership team
- To review the performance, resourcing and resilience in Development Management set against the workload pressures from the volume of development proposals received and the Planning issues and constraints facing the council
- To assess the effectiveness of communication and relationships with all the customers of the Development Management service including: district and parish councillors; neighbourhood forums and the general public; applicants and agents; the wider development community; and consultees and specialists advisors.
- To assess the effectiveness of the internal Development Management processes to deliver timely and effective decisions
- To review the ability for the council to provide the necessary skills for staff to make effective decisions and ensure that the well-being of staff is given sufficient priority to enable staff to progress in their careers at Horsham.

- 3.6 The scope of the review is quite narrowly focused to Development Management and we have been asked not to focus to any great extent on either the Planning Committee or Planning Compliance areas. The reason for this is that PAS carried out reviews on the Planning Committee and Planning Enforcement in 2018 and 2019 and the council is currently implementing the recommendations of these with reviews by implementing a recent restructure of Planning Compliance and a current internal review of the Planning Committee structure. However, the report does refer to Planning Compliance and Planning Committee when we consider they are relevant to the overall performance and effectiveness of Development Management.
- 3.7 These aims and the issues they raise were examined by the Peer Team across five key themes, which are common to all peer reviews and form the structure for this feedback report. They are:
- **Vision and leadership** – how Horsham District Council and the development management service demonstrate leadership to integrate planning within corporate working to support delivery of corporate objectives.
 - **Performance and management** – the effective use of skills and resources to achieve value for money, and the effectiveness of processes (and the roles of officers and members) in decision-making on development proposals.
 - **Community engagement** – how the development management service understands its community leadership role and community aspirations and uses planning to help deliver them.
 - **Partnership engagement** – how the development management service works with partners to balance priorities and resources to deliver agreed priorities.
 - **Achieving outcomes** – how well the service leverages national and local planning policy to deliver the sustainable development and planning outcomes its community requires.

The peer review process

- 3.8 Peer reviews are improvement focused and it is important to stress that the review of Horsham's development management service was not an inspection. The process is not designed to provide an in-depth or technical assessment of all plans and proposals or to undertake a forensic analysis of every aspect of service. The peer team used their experience and knowledge of local government to reflect on the information presented to them by Horsham as well as by people they met and the things they saw, reviewing this through a strategic lens to focus on the most important issues for the development management service.
- 3.9 The peer team prepared by reviewing a range of documents and information to ensure we were familiar with the Development Management service and the challenges it is facing. The team then carried out the core of the review onsite over 2 days in late February 2024. As well as in-person meetings, some meetings were held virtually before and during the onsite review to reach as many people as possible. In total, the team gathered information and views from over 50 people. All the information collected is on a non-attributable basis to inform this report.
- 3.10 In presenting this feedback report, the peer team has done so as fellow local government members and officers. By its nature, the review represents a snapshot in time and the peer team appreciates that some of the points in this report may touch on things that Horsham is already addressing or progressing. However, the team is keen to provide a comprehensive report and full understanding of its conclusions. As part of the work, the peer team presented a verbal summary of this report and evolving recommendations to an audience made up of some of those who took part in / were interviewed as part of the review.
- 3.11 The peer team would like to thank councillors, staff, community representatives and partners for their open, honest and constructive responses during the review process. The team was made to feel very welcome and appreciate the time that everyone committed to their work.

4.0 Context and background to the review

- 4.1 Undoubtedly the biggest Planning challenge that Horsham faces at the moment is water neutrality. In September 2021 Natural England issued a Position Statement to Horsham District Council and other authorities within the Sussex North Water Resource Zone. Natural England cannot conclude that water abstraction at Pulborough Brooks (the primary water supply by Southern Water) is not having an adverse impact on an internationally protected wildlife site. This means that if development is to proceed within the water resource zone it needs to demonstrate it is water neutral. This has had a significant impact on the council's ability to make timely decisions, and to proceed positively with applications. It has also added a significant extra burden to planning staff who have had to upskill and now need to consider water neutrality as one of the key considerations when assessing applications.
- 4.2 In May 2023 the Council changed from a longstanding Conservative administration to a Liberal Democrats overall majority with 27 Liberal Democrats, 11 Conservatives, and 8 Greens (in addition there are 2 vacancies with bi-elections taking place shortly).
- 4.3 Horsham's Local Plan has been delayed for two years in part due to the significant level of work which has been needed to include water neutrality in the plan. However, it has now reached a milestone with the new Local Plan receiving Full Council approval in December 2023 and the council is now out to Regulation 19 consultation.
- 4.4 The council lacks a 5-year housing land supply which is currently at 2.9 Years, and therefore planning officers need to consider speculative development in this policy context. The current standard methodology housing figure is 911 (at the time of the review) dwellings per year, but we understand that the council is currently falling well short of this figure.
- 4.5 The Council has a large number of Made Neighbourhood Plans across the District with 19 Made Neighbourhood Plans. A further 4 Neighbourhood Plans have been delayed due to water neutrality with referendums on these plans scheduled for later this year.
- 4.6 The Council deals with around 3000 planning and related applications per year, and there are a number of strategic sites, including a 2750 home scheme to the north of Horsham. Further strategic sites are allocated in the new local plan. Workloads remain high particularly as throughput has slowed down, in part due to water neutrality. Nevertheless, in terms of national performance indicators Horsham is doing well and throughput is about average against national indicators (see appendix 1). In the period October 2021 to September 2023 91.6% of Majors were determined in time (against a minimum national threshold of 60%) and 95.3% of non-Majors were determined in time (against a minimum national threshold of 70%). However, this performance has been heavily dependent on agreeing extensions of time (this is considered in more detail within this report). In terms of quality of decision-making, Horsham has also performed well against national performance standards and the council is comfortably below the national maximum figure of 10% of Major and non-Major applications overturned at appeal.
- 4.7 The council has recently been successful in securing £58,000 Planning Delivery and Skills Funding to reduce its planning applications backlog and has resources in place to commit this funding before the end of March 2024.

5.0 Detailed Feedback

5.0.1 The following sections set out the findings of the peer review, including an analysis of strengths and areas for improvement. In line with the peer review process, findings are structured around each of the five key themes considered in a review.

5.1 Vision and Leadership

The role of the senior management team

5.1.1 The Planning senior management team at Horsham is very well respected across the council by both councillors and officers and also has the confidence and respect externally from the development industry, community representatives and other stakeholders. All the senior managers have been at Horsham for a number of years, gaining internal promotion and the peer team observed a very stable management team with individuals who work very well together. This is a clear strength within the Planning service and the council should not underestimate the importance of this stability during very difficult times nationally with local government and the Planning profession. However, some concern was raised that the senior management team is a little too comfortable in its thinking and it is important that the senior managers challenge each other and are capable of calling out weaknesses in the Planning service. Therefore, it is timely that the council has agreed to put itself through an external peer challenge at this time.

The Local Plan

5.1.2 We found clear evidence that the Local Plan process has been a successful one to date. After delays outside of the council's control due to water neutrality issues, the Local Plan is now progressing well to Regulation 19 stage and has received praise from all stakeholders. Senior councillors have felt properly engaged in the process, even if not all agree with some of the policy direction. There are also positive links and alignment with the Council Plan. This is a significant achievement, particularly as the Local Plan has been progressed through a change in political leadership and a very significant planning constraint as a result of issues with water neutrality.

Wider Development Management team

5.1.3 Whilst the senior management team is fully aligned with the corporate priorities of the council and the direction that Planning is taking in Horsham, the peer team found that below the senior management level, this understanding was inconsistent. Whilst some team managers and Planning officers had a good understanding others appear to take a more reactive approach. We found no resistance to responding to corporate priorities, but there was a general lack of awareness of corporate values and strategic priorities for the Planning service or a clear understanding by officers of what was expected of them. This is not an unusual situation for a council as officers at a lower level in an organisation will generally have less recognition of strategic priorities for the council. However, Horsham is committed to ownership of the corporate priorities as evidenced by very visible publicity about its values and objectives. Therefore, the peer team considers that this is an area of improvement that can be pursued by the senior management team.

5.1.4 The peer team found a very positive relationship between the Development Management and Strategic Planning teams. We found evidence of mutual respect and shared ownership of both the

Local Plan and Development Management across all officers in Planning and the separation of responsibilities under different senior managers does not hinder communication and shared working. We heard that relatively recently the specialist officers were placed under Strategic Planning from Development Management. However, we also heard that these officers feel properly engaged in the Development Management process and are very comfortable with this arrangement.

Relationships with councillors

- 5.1.5 The peer team found a positive relationship between councillors, particularly in the ruling group, and the Planning professionals. We were told that this has improved since the change in political leadership. We were told that there is mutual respect for the different roles that councillors and officers play in Planning decision-making.
- 5.1.6 The peer team was not asked to review the Planning Committee process, but it became clear to the peer team that some councillors were finding it difficult to differentiate between their ward councillor and Planning Committee roles. Horsham is unusual in having all councillors on a Planning Committee and this inevitably results in some councillors being more cognisant of Planning matters and the councillor role in decision-making. We heard that there was a commitment to councillor training on Planning matters and particularly the councillor role on Planning Committee. However, we heard that this was not always meeting councillor needs or was sufficiently engaging. It is really positive that a separate Planning Committee review is underway and the peer team heard that it is having positive results. This review should continue to be treated as a priority for the council as it will help address some of the issues raised in this Peer Challenge. This should take place with a review of the existing councillor training arrangements.

5.2 Performance and management (see also analysis in Appendix 1)

Reputation of Development Management

- 5.2.1 The peer team heard very genuine respect for the professionalism and knowledge of the Planners working at the council. This was from both within the council and external partners and stakeholders. Stakeholders who work with other councils were heard to say that they thought that Horsham is “better than other councils” and this is evidenced by the council’s relatively good appeals record and positive engagement with partners through Planning Performance Agreements (PPAs) and other partnership approaches.
- 5.2.2 The Development Management teams have scheduled case management meetings, but we understand that these do not always take place due to workload pressures. The council has a policy of holding regular 1 to 1 meetings although we heard that these also do not always take place due to workload pressures. On a more positive side, we saw some impressive performance management reports being prepared including a monthly fees risk report that managers are able to use to monitor risk.
- 5.2.3 The peer team found that there were areas of inconsistency across teams and even within teams. The Major Applications, Planning and Building Control Support and Planning Compliance Teams appear to be managed effectively and we heard praise from throughout the council and externally about the effectiveness of these teams. However, with the Applications Team, the messages we heard were inconsistent. As one of the larger Development Management teams, the Applications

Team takes responsibility for the largest volume of applications (over 95% of applications that are included in the national DLUHC performance statistics) and therefore it is crucial to the overall effectiveness of the Development Management service. Whilst there is best practice in certain areas of the team, there are also areas of real concern.

Officer caseloads

- 5.2.4 Perhaps the greatest concern that the peer team found in the Applications Team is the high caseloads of some officers and bottlenecks that appear in the throughput of applications. We found that some case officers had very high caseloads; although the average caseload per case officer in the Applications Team is 49.5 (as of 12th February 2024) which is quite high, but should be manageable. However, the officer with one of the highest caseloads was the Team Leader which is highly unusual both for a team leader to even have a caseload when managing such a large team and for this caseload to be so high.
- 5.2.5 The overall number of applications received in any one year at Horsham is high at around 3,000. The Development Management service is, however, sufficiently-resourced compared to other councils with a similar number and type of planning applications. Water neutrality issues have undoubtedly slowed throughput and increased the workload of officers, but if water neutrality was taken away as a factor then the peer team considers that there are probably about the right number of managers, case officers and support staff to manage the caseload received.
- 5.2.6 The throughput of applications in the Applications Team appears to be good in terms of volume for many officers and, in one case is as high as 713 applications over a two year period. However, the throughput is also inconsistent with the Team Leader having one of the lowest turnover rates. This is not surprising as different applications take longer to determine than others and officers dealing with matters such as prior approvals, lawful development certificates etc will undoubtedly determine far more applications than those dealing with the larger Minor applications. We were also told that the Team Leader picked up unallocated cases to relieve pressure on the wider team. In addition, the council has been significantly hindered by having to deal with water neutrality issues over the last few years and this has slowed down the determination rate for those applications affected by water neutrality.
- 5.2.7 However, we were told that the most significant bottlenecks appear between the case officer completing their recommendation and one of the signing-off managers confirming the decision. Officers and managers were unable to give us the exact numbers in this “holding area” at the time (a concern in itself) but we were subsequently advised there are currently 33 reports (10 in time and 23 out of time) awaiting sign-off. This is certainly an area for concern, but not as significant as the peer team was anticipating and not exceptional for an authority dealing with the number of applications Horsham receives. The reasons for the gap between perception and reality are unclear. Anecdotally we were told that some applications had been waiting for months for sign-off. This anecdotal evidence was confirmed by local agents who expressed concern that there appeared to be no logic behind sign-off times except that if an application was within the 8-week determination period it was “fast-tracked”. If not, it could be held up for weeks or even months. We were also told that a number of retrospective applications linked to planning compliance action had not been prioritised and were caught in the backlog.
- 5.2.8 When the peer team probed more deeply into this perceived sign-off bottleneck we found a number of reasons being identified. Part of the problem was the high caseload of all the signing-off managers

and particularly the Applications Team Leader. However, we also heard that the signing-off managers feel that they need to correct many reports due to the risks of not properly addressing water neutrality and other issues that case officers have overlooked. It was implied by some managers, that officers were passing through applications for sign-off before key matters were ready or resolved. We also heard from officers that there was a culture of giving agents multiple chances to 'get things right' rather than refusing planning applications. So, applications were often returned to officers to resolve matters. Managers acknowledged that performance statistics were a contributory factor and a priority given to applications still within the statutory deadlines or within extension of time agreements.

- 5.2.9 No one we spoke to as part of this Peer Challenge is happy with the current situation with the Applications Team and the peer team considers that this is the area that requires the most urgent action to address the health and well-being of managers and staff as well as performance. The position where managers have a high caseload alongside a high number of out-of-time applications which need to be resolved is unsustainable and needs immediate attention and the peer team would stress the need for an urgent review of the operation of the Applications Team taking account of some of the recommendations outlined in this report.
- 5.2.10 The backlog bottleneck on 12th February 2024 was a total of 487 planning applications of which 145 were out of time with no extension of time agreement. If officers are successful in removing the backlog then it will inevitably result in a short-term dip in performance. However, Horsham's performance, as measured by the Government's statistics is good, and therefore this dip in performance should be manageable without any threat of not meeting the minimum Government targets.

Use of extension of times

- 5.2.11 In line with virtually every council in England, Horsham commonly uses extensions of time to ensure that applications remain "in time" once they go past the statutory determination date. The percentage of applications determined within the statutory time limits within the two-year period of October 2021 to September 2023 was 19.2% for Majors (against the Government performance target of 60%) and 46.6% for non-Majors (against the Government performance target of 70%). Therefore, extensions of time have significantly masked Horsham's performance as their published performance with extensions of time over the same period is 90.9% for Majors and 95.7% for non-Majors. The use of extensions of time is very high and above the national average. However, Horsham has been constrained in determining applications due to water neutrality and many other councils have higher use of extensions of time.
- 5.2.12 There are set procedures laid out on the use of extensions of time, but these are not being consistently followed and we were told of some bad practice followed both by officers and local agents. One of the poorest practices is to allow an application to go over time without an extension of time and then to ask for the agreement at the point of decision. This leaves an applicant little choice but to agree to it. Also, the Government is currently consulting on a significant restriction of the use of extension of times and a proposal to measure performance based on the statutory time limits. If these changes are implemented the council may find that it is unable to mask slow decision-making through the use of extension of times and find itself under threat of designation. For example the council is still heavily reliant on extensions of times for applications classed as "Other" even though there can be little justification for many of these types of applications to go beyond the statutory 8-week target.

5.2.13 The Peer Team considers that following the removal of the backlog of applications, a more simplified mapping of the decision-making process (i.e. explaining the steps to be taken at each stage of an 8, 13 and 16-week application) would provide greater certainty for all members of the team, and would improve consistency of approach. The mapping could also form part of an induction process for any future new starters.

The Planning Guarantee

5.2.14 A related matter to extensions of time is the council's commitment to the Planning Guarantee that requires a council to determine a Major application within 26 weeks (or as agreed through an extension of time) and a non-Major in 16 weeks (or as agreed through an extension of time). If a council does not determine an application within this time an applicant is entitled to have their application fee returned. Horsham prepares a fees risk report on a monthly basis to monitor the number of applications falling outside the Planning Guarantee thresholds. This level of monitoring is good practice, but unfortunately it is not being used by all managers and it shows that the council is at risk of having to return fees. It is therefore important that the council takes action to reduce this risk by either determining the outstanding applications or agreeing to extensions of time with applicants.

IT processes

5.2.15 One of the key indicators of an efficient Development Management service is efficient IT processes. Horsham uses the UNIFORM software system that is common to a high percentage of English councils. However, there appears to be a significant problem experienced by officers in using the system. The peer team was told about regular power outages recently have meant that for periods of time staff were not able to carry out their work and the public was unable to gain public access to planning information. We also heard that there was a problem with the functionality of the IT systems with duplication of tasks caused by incompatible systems (Uniform and Enterprise). This situation causes delays in the processing of applications and frustration among staff. The peer team did not have the time or expertise to analyse why these problems are occurring, however, it is really important that these matters are resolved so that it does not hinder the effective operation of the Development Management function. We were told that consideration is being given to the migration of the planning applications to AGILE software, but there are ongoing delays with the implementation of AGILE which is causing uncertainty. The planning applications software should be on every council's critical risk register and it is essential that the council makes a decision promptly on ensuring it uses a software system that is both reliable and fit for purpose.

Validation and support

5.2.16 Validation at Horsham is carried out within the Planning and Building Control Support Team. There have previously been delays with validation due to staff shortages, but records from December 2023 show that applications are being validated in an average of just over 6 days. National best practice indicates that 5 days is a quality benchmark standard and therefore Horsham is nearly reaching best practice. Of equal importance is the quality of the validation process and we were told that the validation officers undertake the task very effectively with a proactive approach to contacting applicants when there are validation issues and taking a pragmatic approach to the information required. This is even though we were told that there is a high rate of invalidation of planning applications (at around 50%) due to the poor quality of applications submitted.

Training and guidance

- 5.2.17 The peer team heard that Horsham has an excellent approach to supporting staff and succession planning. It is really encouraging to hear that the training budgets have been retained and staff are provided with individually tailored training programmes. This has undoubtedly helped both the retention of staff and enabling the most capable staff to gain internal promotions within the organisation. There is a national shortage of Planners, particularly at the more senior level and therefore it is a credit to the council that it takes the training of its staff so seriously so that it can “grow its own”. For example, we heard from one member of staff who joined at a junior support level, and was supported in acquiring his qualifications to take up a senior professional role in the Planning team. However, we heard that a small number of senior officers were leaving to progress their careers and for higher salaries.
- 5.2.18 The culture of self-learning and development is very evident in its approach to dealing with water neutrality issues. The peer team heard that the announcement regarding water neutrality came unexpectedly and Horsham was instrumental in understanding the implications for the planning consents process, and then advising applicants on the process they will need to follow. This impressive self-learning has been endorsed by both representatives of the development industry who we spoke to and Natural England.
- 5.2.19 There are also extensive guidance notes for Planning Officers and support staff. This includes a new starter pack and a strong support process for helping staff understand the key tasks of the job. This is very much in line with the overall culture of support and guidance that exists in the council.
- 5.2.20 However, we heard that due to caseloads and bottlenecks in the Applications Team, even although managers were generally holding case meetings with staff, they found it hard to find time to hold regular one-to-ones with staff to help with support and development. The PAS Peer Team was concerned that, in the medium term, this will impact staff morale and their health and wellbeing.

5.3 Community Engagement

Reputation of Development Management

- 5.3.1 The peer team heard some very positive feedback from district and parish councillors as well as neighbourhood forums on the way that Planning engages with the local community. District councillors receive regular emails from Planning on current planning applications and generally find that they can contact officers if they need advice and guidance. Parish councillors also appreciate the communication they receive and generally know who in the Planning team to contact on Planning matters. Community representatives who also engage with other councils have the impression that Horsham is better at engaging with the community than most other councils.
- 5.3.2 The positive engagement that Horsham has with the community is reflected in the low level of formal complaints that are upheld by the council on Planning matters. Development Management inevitably elicits complaints due to the contentious nature of Planning, but it is encouraging to hear that upheld complaints are rare and action is taken by the council to learn from upheld complaints when they do arise.

- 5.3.3 A common issue raised by community representatives was the way that officers respond to lay people in the community. There is a tendency for some officers to write correspondence as if the audience are Planning professionals rather than people with little knowledge of the Planning process. We reviewed some of this correspondence and could find no fault in the content of the correspondence, but agree that it had not been written with the recipient in mind and perhaps was written with a focus on avoiding formal challenge rather than genuinely engaging with the enquirer.
- 5.3.4 A further common concern raised related to re-consultation on amendments to applications. The parish and neighbourhood forum representatives found it hard to identify the changes on the amended drawings and spent a lot of time 'spotting the difference' in the drawings. Then, if they were not sure they would contact officers directly. We suggest that this could be resolved by asking all applicants to accompany amended drawings with a list of the changes which can be shared with all consultees.
- 5.3.5 Whilst engagement by officers with the community is generally good, the peer team heard of significant inconsistency amongst officers. Whilst individuals were given praise for their customer-friendly attitude we often heard the phrase "It very much depends on the officer". In one case we heard from a councillor that they had got so frustrated by the failure of an officer to return his phone calls that he felt the need to lodge a formal complaint.

Statement of Community Involvement

- 5.3.6 Horsham's Statement of Community Involvement was adopted in September 2020 and sets out how Horsham engages with the community on Planning matters. The peer team was surprised that most of the councillors who we spoke to had little or no knowledge of the Statement of Community Involvement even though officers confirmed that councillors had been briefed on its content. As a consequence, there is poor understanding by ward councillors of the processes followed by the council on Planning matters and how they can engage with Planning. The peer team considers that a relatively "quick win" could be for the council to prepare a plain English guide on the Planning process and how to engage in Planning matters for key community representatives. This could perhaps be accompanied by a review and relaunch of the Statement of Community Involvement, at the right time, in consultation with all councillors.

Customer service

- 5.3.6 Managers expressed their frustration that they were unable to adequately monitor responses made by officers due to a change in the telephone system. We heard that telephones were monitored when using a previous telephone system Ringcentral, but this is more difficult now that telephone calls have been largely replaced by MS Teams meetings and chat facilities, and there does not appear to be any reporting function available to managers. The peer team considers that the very positive messages that are being expressed by the community in general terms are being undermined by inconsistencies and individuals who do not have the same customer-focused culture that others have.
- 5.3.7 To address some of the community concerns we suggest that a range of actions could be relatively simply implemented. This could include measures such as: building on the model of the successful local agents forum to allow parish councils to better understand relevant Planning issues; and better use of the website to help the community self-help on key planning matters, for example with a plain English questions and answers section. In terms of phones, it is suggested that, whilst clearing the

sign-off backlog, limiting hours of phone access to case offers to 2-3 hours a day. These hours should be published and explained to help manage expectations, with a defined end date. This needs to be accompanied by an effective monitoring system so that managers can call out any individual officers who are not meeting the council's own customer service standards.

5.4 Partnership Engagement

Reputation of Development Management

5.4.1 Generally relationships between Development Management and partners are very good and, in some cases exemplary. Usually, the biggest critics of a Development Management service are local agents. However, in Horsham's case the local agents are quite complimentary about the service they receive and told the peer team that Horsham is one of the best councils to deal with in the local area. Criticisms are mainly directed towards individual officers and individual applications rather than the service as a whole. In the same way, the larger developers expressed satisfaction with the service provided by Horsham and a "can do" attitude.

Local Agents Forum

5.4.2 The Local Agents Forum meets on a 6-month basis and is welcomed by local agents who find the sessions helpful and can engage effectively with officers. The peer team considers that the Local Agents Forum could be used better to enable local agents to help improve the speed and quality of decision-making and customer service. We were told that only approximately 50% of applications are valid on submission and this undoubtedly slows the decision-making process as well as putting pressure on resources. Some of the highest performing councils use their local agents' forums to provide training to local agents and engender a shared responsibility for improving the quality of application submissions.

Businesses

5.4.3 We heard feedback from Economic Development on the view of the Development Management service from local Horsham businesses. We were told that some businesses struggle to navigate the planning system particularly when it comes to planning applications. We were also advised that although senior planners are aware of economic priorities in Horsham, often more junior planners are less aware and less flexible. It was suggested by the sector that it would help to have a business champion contact in the Development Management service to support business applicants.

Consultees

5.4.4 The peer team was told that Development Management has good relations with both internal and external consultees and there is efficient and timely notification when consultee responses are required. We were also told that officers represent the views of consultees well in their officer assessments and, although case officers do not always follow the advice of the consultees, the case officers do show clearly how they have balanced of weight of different material considerations to reach their final judgement. In some cases, however, consultees raised concerns that case officers sometimes do not communicate well with consultees when they go against advice and the consultee is left to look up the decision themselves. The consultees accept this is due more to workload pressures rather than purposely withholding this information and did stress that some officers are better at communication than others.

- 5.4.5 Many of the consultees who the peer team spoke to acknowledged that there were delays in responding to planning applications and that this was due to their own work pressures. Councillors and officers also raised an issue with a lack of understanding in certain consultee specialist areas. Councillors were particularly concerned about their understanding of County Highways matters which often get exposed at Planning Committee. Highways matters are a particular concern to local residents and councillors told us that they sometimes found the County Highways responses difficult to explain to local residents. Officers raised a particular concern regarding Natural England's responses on water neutrality matters. Although this has now improved, officers told us that they had to resort to 'Googling' water neutrality matters initially to help them understand how to approach the Planning issues related to water neutrality.
- 5.4.6 The peer team understands that a lot of awareness raising has recently taken place with officers, particularly with regard to water neutrality and Chief Executive level meetings take place with councils affected by water neutrality. However, we feel more work could take place at the senior officer level at Southern Water regarding water neutrality and County Highways regarding strategic highway matters.

Council-wide co-ordination

- 5.4.7 The peer team also heard about a lack of co-ordination in some cases where Council Plan priority regeneration projects were being stalled due to a lack of joined-up action both internally within the council and with external partners. An example given to us was the London Road Car Park site where we were told that departments within the council are not working effectively together to come forward with a regeneration project that meets Planning requirements. Some of the highest performing councils have set up internal groups where key decision-makers across the council work together to unblock planning issues so that a joined-up approach can be taken to ensure the delivery of priority projects that meet the objectives of the different agents in the development process.

Registered Providers

- 5.4.8 Similarly we were told that the delivery of affordable housing was a key concern for the council and, whilst the council has a very active housing delivery team, there was sometimes a miscommunication between Development Management and the Registered Providers of social housing. We understand that there previously was a Registered Providers forum and the peer team considers that it would be helpful to resurrect this forum and have the active involvement of Planning managers to help assist Registered Providers to deliver affordable housing where it is most needed.

5.5 Achieving Outcomes

Reputation of Development Management

- 5.5.1 Horsham's Development Management service has been complemented by a range of interviewees on its focus on achieving outcomes with the Major Team and Planning Compliance Team being held up for their proactive approach to delivery. Also, customers of the Development Management service appreciate that very often outcomes are not achieved due to factors outside of the council's control, such as water neutrality issues.

Planning Committee review

5.5.2 The peer team also welcomes the progress that the council is making in reviewing its Planning Committee processes. It is very unusual for all councillors to sit on a Planning Committee and, as identified through the review, the changes proposed should improve the operational efficiency of the committee process as well as avoid the potential blurring of the roles of ward councillors and Planning Committee members.

Pre-application service

5.5.3 An area of weakness identified by the peer team through the performance figures and responses by interviewees was the poor pre-application service provided by Horsham. The council advertises on its website challenging response times to deal with pre-application enquiries, but the performance figures provided to the peer team reveal that these targets are rarely achieved. Local agents advise us that they feel there is little point in going through the pre-application service as the service is not prioritised by officers and therefore responses are slow. Also, and ironically, local agents told us that Horsham Planners are very good at negotiating on the live planning applications and so they are confident that a negotiated solution can often be reached without having to have pre-application negotiations.

5.5.4 There are some very clear exceptions to the council's pre-application approach and this includes when an applicant comes forward with a strategically important development opportunity, such as the North Horsham Mowbray development. In this case the council has entered into a Planning Performance Agreement with the development and has focused significant resources into achieving a successful development outcome.

5.5.5 Ultimately, it is up to Horsham on its approach to pre-applications, but at present the service is not fit for purpose and performance targets are not being met. The council could continue with its customer-focused approach to negotiating on live planning applications and accept that additional income will not be forthcoming as resources will be focused on planning application negotiation. Alternatively, the council could take the approach that a number of councils now follow where very limited negotiation takes place with a live planning application, but the council promotes and resources its pre-application service. In this way, the council gains additional income through the pre-application discretionary service. However, if the council is to take this approach it must bring local agents on board and clearly explain the approach AND meet performance targets for their pre-application service. This new approach will also assist with meeting emerging changes to Development Management performance measures.

Duty officer service

5.5.6 Horsham currently provides a free duty officer service whereby members of the public can ring an officer and receive free advice on issues related to the need for planning permission and the process to follow. This service used to be very common throughout the country, but is now relatively rare as council resources have been scaled back and the pre-application service has become an established option for applicants. The peer team was told that the current duty officer service is not providing the service that was intended and is used predominantly by the public to complain that they cannot make contact with their case officer. Also, the officers who carry out the duty officer service are finding it a major constraint on their time.

5.5.7 There are now excellent online resources available to individuals who wish to submit planning applications. The most used is the [interactive tool provided by the Planning Portal](#). Many councils will now simply direct enquirers to the Planning Portal and then if an individual still wants guidance

from a Planning Officer they are asked to pay for the advice based on a time-limited online service (e.g. an MS Teams call). This ensures that officer time is paid for and avoids non-essential enquiries.

Legal support

- 5.5.8 The peer team was advised by officers that delays in decision-making were in part caused by a lack of legal staff available. We heard that the legal officers and Planning Officers work well together, but the legal staff were struggling to meet decision-making deadlines and there was a regular change of legal staff that exacerbated this problem. We were told that the critical delays occurred with drawing up S106 agreements and issuing enforcement notices. However, unlike many councils, we were told that a legal officer attends every Planning Committee and a retained barrister was on hand to deal with contentious matters when needed.
- 5.5.9 We consider that it would be beneficial if there was a more formalised arrangement between Planning and Legal on key areas of work that impact on the performance of Horsham's Planning service, perhaps through a Service Level Agreement. This is likely to become even more critical if the Government introduces new performance measures through the Accelerated Planning System proposals as greater pressure will be put on all Local Planning Authorities to deliver quicker decisions.

6.0 Implementation, next steps and further support

- 6.1 It is recognised that Horsham District Council and the planning service will want to consider and reflect on these findings.
- 6.2 To support openness and transparency, we recommend that the Council shares this report with officers and that they publish it for information for wider stakeholders. There is also an expectation that the Council responds to the findings and recommendations in the report with an action plan, publishing this alongside the report itself.
- 6.3 Where possible, PAS and the LGA will support councils with the implementation of the recommendations as part of the Council's action plan. A range of support from the [LGA](#) and [PAS](#) is available on their websites. Some specific areas of support that the authority might wish to look at includes:
- [Pre-application and Planning Performance Agreements](#)
 - [Development Management Challenge Toolkit](#)
 - [Good Development Best Practice](#)
- 6.4 Horsham District Council is also invited to discuss ongoing PAS support with Peter Ford, Principal Consultant, peter.ford@local.gov.uk and any corporate support with Rebecca Ireland, Senior LGA Regional Advisor rebecca.ireland@local.gov.uk.
- 6.5 As part of the LGA's peer review peer impact assessment and evaluation, PAS and the LGA will contact the Council in 6-12 months' time to see how the recommendations are being implemented and the beneficial impact experienced.
- 6.6 The author of this report is Peter Ford (peter.ford@local.gov.uk), on behalf of the peer review team.
- 6.7 This report was finalised in agreement with the Council on 22nd April 2024.

We are grateful for the support of everyone that contributed to this review.



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Appendix 1 - Trends in Development Management at Horsham

- (i) Speed of decision-making on Majors (2-year data to End-Sept 2023)
- (ii) Speed of decision-making on Non-Majors (2-year data to End-Sept 2023)
- (iii) Quality of decision-making on Majors (2-year data to End-Sept 2022)
- (iv) Quality of decision-making on Non-Majors (2 year data to End-Sept 2022)
- (v) Planning applications received; planning applications granted; percentage of applications delegated to officers (Year to Sept 2023)
- (vi) Planning decisions by development type (Year to End-Sept 2023)
- (vii) DM Officer caseloads (immediately prior to Peer Challenge visit)
- (viii) Number of applications in time or out of time (as of 12 February 2024)
- (ix) Pre-application caseloads and determination timescales (2022-2023)
- (x) Current Appeal Casework (As of 7 February 2024)
- (xi) Validation times (average time to validate, 2023)

(i) P151a Data - Speed of decision-making on Majors (2 year data to End-Sept 2023)

24 Month Major Performance to 30 September 2023	83 major decisions in total, 91.6% of which were determined in 13 weeks or within agreed timeframe
	16 out of 83 made in 13 weeks = 19.2%
	60 out of 66 (PPA, EoT, etc) made within agreed time = 90.9%

(ii) P153 Data - Speed of decision-making on Non-Majors (2-year data to End-Sept 2023)

24 Month Non-Major Performance to 30 September 2023	2,361 non-major decisions in total, 95.2% of which were determined within 8 weeks or within agreed timeframe
	1,101 out of 2,361 made in 8 weeks = 46.6%
	1,147 out of 1,198 (PPA, EoT, etc) made within agreed time = 95.7%

(iii) P152a Data – Quality of decision-making on Majors (2-year data to End-Sept 2022)

24 Month Major Performance To 30 September 2022	84 major decisions were made during the 2-year period. During the same time 3 major decisions were overturned at appeal (3.5%)
	That figures drops to 2.4% when appeals relating to planning conditions are excluded
	There was 1 major that was not determined that was the subject of an appeal (84+1 = 85 majors)
	9 majors proceeded to appeal, 3 of which were overturned - 33%

(iv) P154 Data: Quality of decision-making on Non-Majors (2-year data to End-Sept 2022)

24 Month Non-Major Performance To 30 September 2022	2,675 non-major decisions were made during the 2-year period. During the same time 16 non-major decisions were overturned at appeal (0.6%)
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	That figures remains constant at 0.6% when appeals relating to planning conditions are excluded
	There were 2 non-majors that were not determined that was the subject of an appeal (2,675+2 = 2,677 non-majors)
	81 proceeded to appeal, 16 of which were overturned – 19.7%

(v) **P134 Data – Planning applications received; planning applications granted; and percentage of applications delegated to officers (Year ending to Sept 2023)***

Application Activity	Application Activity Totals Year Ending 30 September 2023	Notes
Total number of applications received	1,277	This figure is typical of a busy local planning authority
Decisions with an Environmental Statement	0	This is not unusual – 200+ authorities did not determine an application with an ES, including Horsham
Decisions with a Planning Performance Agreement	1	This is not unusual– over 200 authorities did not have a PPA-decision in the year, and almost 40 only had 1, including Horsham
Decisions where an Extension of Time (EoT) was made	657	This is a high figure and supports the view that there is an over-reliance on EoTs
TOTAL NUMBER OF DECISIONS	1,201	This figure is typical of a busy local planning authority
Percentage of decisions delegated to officers	96%	This figure appears to indicate that the scheme of delegation is effective in filtering appropriate applications for Committee determination
Percentage of decisions granted	91%	This is a healthy approval rate which supports the view that decision-making in Horsham is sound

* The data in the table cover minor developments, changes of use where the site area is less than one hectare and householder developments.

(vi) **P124a Data – Planning Decisions by Development Type (Year ending to Sept 2023)**

Development Type	Planning Decisions – Year Ending 30 September 2023
Major dwellings	14
Major offices, research and development, light industry	2
Major general industry, storage, warehousing	1
Major retail and service	1
Major traveller pitches	0
Majors - all others	26
Major public service infrastructure developments	0

TOTAL MAJORS	44
Minor dwellings	115
Minor offices, research and development, light industry	3
Minor general industry, storage, warehousing	6
Minor retail and service	5
Minor traveller pitches	2
Minors – all others	164
TOTAL MINORS	295
Other decisions – changes of use	39
Others – householder development	728
Others – advertisements	21
Others – listed building consents (alter/extend)	72
Others – listed building consent (demolish)	0
Others – relevant demolition in a conservation area	2
TOTAL OTHERS	862
TOTAL – MAJORS, MINORS & OTHERS	1,201

(vii) **DM Officer caseloads (immediately prior to Peer Challenge visit)**

	Applications Team	Major Development Team
Average number of live applications – Planning Officers	46.2	N/A
Average number of live applications – Senior Planning Officers	55.5	37.75
Average number of live applications – Principal Planning Officers and Team Leader	53	26

- This does not include any applications being considered on behalf of South Downs National Park
- There are only 2 Principal Planning Officers in the Major Development Team

(viii) **Number of applications in time or out of time (applications that were live as of 12 February 2024)**

	In time	In time with EoT	Out of time (has EoT)	Out of time (no EoT)	Total
Majors	19 (26%)	18 (25%)	21 (29%)	14 (19%)	72
Minors	26 (13%)	16 (8%)	92 (45%)	70 (34%)	204
Others	99 (47%)	10 (5%)	41 (19%)	61 (29%)	211
TOTAL	144	44	154	145	487

- A relatively high percentage of Majors are running beyond their EoT dates;
- Only 21% of current Minors are within time (with or without an EoT);

- More 'Others' are kept in time than Majors or Minors.

(ix) Pre-application caseloads and determination timescales (2022-2023)

Pre-Application Type	TOTAL RECEIVED	Overdue by a week	Overdue 2-3 weeks	Overdue 4-6 weeks	Overdue 7 weeks or more	Percentage In Time
Do I need planning permission	182	18	20	32	29	46%
Minor CoU, LB, PA, Adverts	60	5	5	14	24	20%
Details reserved by condition	1	0	1	0	0	0%
1-9 residential unit or 101-1000sqm commercial	75	6	9	16	30	19%
Householder or small scale commercial	82	7	8	22	21	29%
Small scale Major	38	1	1	20	14	5%
Medium scale Major	16	2	1	5	7	6%
Large scale Major	26	5	3	8	6	15%
TOTAL	480	44	48	117	131	29%

- Fewer than 30% of all pre-application submissions are completed within time;
- Major pre-application is particularly slow. In the absence of a reliable pre-application service, applicants are more likely to submit planning applications and seek to negotiate/amend during the application rather than use the (paid for) pre-application process.

(x) Current appeal casework (as of 7 February 2024)

Appeal Type	Lodged/Validated	In Progress	Total
Public Inquiry	0	3	3
Informal Hearing	0	8	8
Written Reps	3	34	37
Fast Track - Householder	0	2	2
Procedure TBC by PINS	17	0	17
TOTAL	20	47	67

(xi) **Validation times (average days to validate an application, 2023)**

Month	Days to Validate
Jan-23	10.5
Feb-23	10.0
Mar-23	9.1
Apr-23	6.8
May-23	6.4
Jun-23	6.1
Jul-23	12.9
Aug-23	7.8
Sep-23	6.6
Oct-23	6.7
Nov-23	5.4
Dec-23	6.6

The national best practice benchmark is to average 5 days to validate an application and therefore Horsham is just above this benchmark.