



Strategic Planning
Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

Date 26th March 2020
Your ref SA681
Our ref A57/253281-8

Dear Sir/Madam

Horsham District Draft Local Plan: Reg. 18 Consultation Response by DMH Stallard on behalf of Sweeptech Environmental Services Ltd & Edburton Contractors Ltd.

Land at The Old Brickworks, and land to the north of The Old Brickworks, Shoreham Road, Henfield.

DMH Stallard act on behalf of both Sweeptech Environmental Services Ltd & Edburton Contractors Ltd on planning matters in relation to their site at The Old Brickworks, and for the land to the north of The Old Brickworks, Shoreham Road, Henfield. Both of these sites front on to Shoreham Road, and are located between the settlements of Henfield and Small Dole. The site to the north of the Old Brickworks is approximately 2 hectares in area, and the site at The Old Brickworks is approximately 3 hectares in area.

We write in response to the Regulation 18 consultation version of the draft Local Plan, our comments relate to the proposed strategy and policies contained in Draft Local Plan, but also to provide site specific comments.

We note that the draft Local Plan sets out a number of spatial objectives which will help the Local Plan achieve its vision, Spatial Objective (1) seeks to deliver a balance between economic, social and environmental priorities. This is in accordance with the NPPF which seeks to ensure economic, social and environmental objectives are delivered in mutually supportive ways.

HDC's acknowledgement that sustainable development extends to the delivery of employment needs is welcomed. At paragraph 3.3 of the HLP, it recognises that 40% of the District's residents commute beyond the boundaries of the District, many of which work within the neighbouring authorities of Crawley and Mid Sussex. This pattern

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of outwards commuting can lead to unsustainable patterns of movement and the draft Local Plan seeks to deliver a suite of employment sites which can deliver against the District's employment needs, and identifies existing sites to be protected for employment use.

It is our view that the Council is right to be concerned that without further employment growth a 'dormitory district' will be created, with more people travelling outside of the district to work, and only returning during the evenings and weekends. There is a danger that if this occurs it will have an impact on the ability to support the current offerings within the towns and villages of the District. We are of the view that this is likely to take place without the creation of additional employment land and the improvement or redevelopment of existing sites such as those at the Old Brickworks.

Strategic Policy 2

This policy sets out the settlement hierarchy of the District, which is the current approach taken in the HDPF, this recognises that the District has a distinct settlement pattern. Each settlement is within one of the 6 categories of settlement based on its function and access to facilities and services. Horsham is defined as the 'Main Town', which is the top tier settlement, and other settlements are divided within the remaining 5 categories.

We note that Henfield is defined as a 'Small Town and Larger Village', the second category of settlement, which is defined as a settlement with a good range of services and facilities. We broadly support the settlement hierarchy approach taken by the Council, and the identification of Henfield as Small Town / Larger Village.

Strategic Policy 2 seeks to direct development (including redevelopment and conversions) to within Built-Up-Area Boundaries (BUABs), with a focus of Previously Developed Land (PDL). Those areas outside of BUABs will be defined as 'countryside' where development will be more strictly controlled.

We note that the BUAB of Henfield does not include the land around The Old Brickworks.

Strategic Policy 6 – Economic Growth

This policy allocates a number of new sites for employment use in the district (office, industrial, storage and distribution uses (B1/B2/B8 use classes)).

The draft Local Plan has been informed by various employment reports, the most recent of which is the Northern West Sussex Economic Growth Assessment (EGA), which was published in January 2020. This report advised that Horsham District *“has recorded job growth over recent years, although the pace of growth has fallen behind regional and national rates. B use class jobs have also been declining within Horsham District, driven by job losses within manufacturing-based sectors in particular. The District now accommodates the smallest stock of jobs within the NWS (Northern West Sussex)”*. This illustrates the need for Horsham to promote the district as a place for businesses to invest and grow their enterprises and the need for the Council to identify and allocate sufficient sites of varying scales to help accommodate various B use class businesses in the District.

The EGA summarises that the net B class employment floorspace requirements over the Local Plan period (i.e. 2019 to 2036) reflect a range of potential growth trajectories and assumptions. The EGA advises that under the baseline labour demand scenario, the Council will need to provide at least 40,730 sqm of B class floor space which extends up to a need for 260,855 sqm of B class floor space under the high growth alternative labour supply scenario over the plan period. This floorspace equates to 35.3 hectares of land for the baseline scenario, and 65.4 hectares under the high growth alternative.

It is clear therefore that the Local Plan will need to allocate a significant amount of land for new B class floor space in the District. From a review of the allocations set out in Strategic Policy 6 it would appear that a total of 41.7 hectares of land is proposed for allocation, it is our view however that further allocations are necessary in order for the District to provide a meaningful amount of new B class floor space.

We also note that all but one of the 10 proposed employment site allocations listed within Strategic Policy 6 are located in the north of the District. It is our view that further consideration should be given to the allocation of additional sites in the south of the District, such as land to the north of The Old Brickworks, which would provide a further 2 hectares of employment land.

The land north of the Old Brickworks is considered to have potential for employment development. The site is well located on the Strategic Road Network with direct access to the site from the A281, which provides connections to Horsham and Steyning and beyond. Given the success of the businesses within the immediate area and the need for additional employment / business floorspace it is considered that there would be immense benefit to designate this site as a potential Employment Site Allocation in the draft Local Plan.

Strategic Policy 7

This policy relates to existing employment development, it states that in order to meet the employment needs of the District up to 2036, existing key employment sites will be safeguarded. The policy sets out the principles for development on Key Employment Areas and other existing employment sites in the District in order to protect their employment use and improve existing provision.

We are disappointed to note that the existing employment site of The Old Brickworks has not been identified as a Key Employment Area within this policy.

It is our opinion that The Old Brickworks should be considered as a Key Employment Area (KEA). It has direct access to the Strategic Road Network via the A281 which runs to the east of the site, and it is sustainably located. The site is well utilised and provides a thriving employment site within the south of the District. As such we consider that this site is entirely appropriate as a KEA.

In terms of its sustainable location, there are bus stops along Shoreham Road which are in close proximity to the site and these provide services to Henfield, Horsham, Small Dole and Brighton. The site is located approximately 1.2km from Henfield and approximately 550m from Small Dole.

The site is performing well and it provides additional employment opportunities in the south of the District.

We submit that this site should be allocated as a KEA, this site provides an important employment offer in the south of the District. The Site as shown in red below is currently occupied by Sweeptech Environmental Services Ltd, a well known and established waste recycling company (sui generis use class), and Edburton Contractors Ltd, a well known and long established local company in B8 use.



Image courtesy of Google Maps

We note that policy 7 states that Key Employment Areas “will be protected for business, manufacturing, storage and distribution uses (B1, B2 and B8 Use Classes).” Policy 7 therefore identifies ‘employment’ as office, industrial, storage and distribution uses that fall within B1, b2 and B8 use classes.

It also states that “Proposals for alternative sui generis ‘employment’ uses within the Key Employment Areas, such as waste management facilities, will be supported...” The principal of both the sui generis waste recycling company and the B8 use on site being located within a KEA is therefore considered to comply with this policy. It is unclear therefore why the site at The Old Brickworks has not been identified as a KEA in the draft Local Plan.

It is our view that it would be completely logical to include this Site as a Key Employment Area. It is a well utilised site which is currently fully occupied by two established local businesses. It should also be noted that by including this Site approximately 3 hectares of additional land will be available for employment space, and

this will help make a significant contribution to the need for commercial space in the District, particularly in the south.

The draft Local Plan is supported by the Northern West Sussex Economic Growth Assessment 2020 (EGA), this jointly prepared evidence base identifies the employment needs of Crawley and Horsham. For Horsham, it is prepared with it in mind that the District wishes to encourage employment growth as a means to reduce outmigration of the workforce.

It should be noted that the Economic Growth Assessment reviewed the existing operational employment sites in the District, including the proposed KEAs this found that “In particular, the accessibility of some KEAs to modern large vehicles is limited” and that there is a need “to ensure that economic development in the District is not undermined by a lack of suitable space (sites and premises).

The EGA had therefore noted that there was a lack of sites which have a suitable access to accommodate large modern vehicles. The Old Brickworks site currently has a suitable access in situ, and would therefore address this concern had it been allocated as a KEA. On this point it should be noted that we provided representations during the previous consultation stage for the Local Plan (Issues & Options) in May 2018, and at this time we advised that The Old Brickworks is available now, it is free from any statutory designations, and that to include it as a key employment area would allow sufficient flexibility to help accommodate the additional employment needs of the District, particularly in the south of the District, and would make a significant and immediate contribution to the additional employment land required.

It does not appear that any assessment of this site has been undertaken as part of the background work on the draft Local Plan. It is our view that further information should be provided on how the potential sites have been eliminated as KEAs, and how boundaries of the KEA has been determined, and in this specific case why The Old Brickworks has not been included as a KEA.

Henfield Neighbourhood Plan

Both the site at The Old Brickworks and land to the north are allocated within the Henfield Neighbourhood Plan as employment sites. The Henfield Neighbourhood Plan (HNP) has been passed (by Horsham District Council) for Independent Examination.

It should be noted that the Henfield Neighbourhood Plan has identified The Old Brickworks as an existing employment site, and land to the north of the Old Brickworks

is allocated as a new employment allocation. The extent of the sites are shown in the HNP policies map below:



Land north of The Old Brickworks (Site F) and The Old Brickworks site - Image taken from HNP

The Henfield Neighbourhood Plan identifies 3 existing employment sites, and allocates 3 new employment sites.

The Old Brickworks; Hollands Lane Industrial Site; and Henfield Business Park are all identified as existing employment sites in the Neighbourhood Plan. The latter is proposed as a KEA in the draft Local Plan, however, no other KEA sites in Henfield are proposed in the draft Local Plan. It is our view that The Old Brickworks should be identified as a KEA in the Local Plan.

Whilst The Old Brickworks is identified as an employment site within in HNP and this is at an advanced stage it is unknown when the referendum will take place and when this will be 'made'. As such, for completeness it is our view that this site should be included

in the local plan as a KEA. We are concerned that as currently drafted the omission of the site will result in a policy conflict between the HNP and the Local Plan, and as such request that the latter be amended to include this site as a KEA.

In addition, the land north of The Old Brickworks is allocated for employment use in the Henfield Neighbourhood Plan. This designation will establish the acceptability of the principle of new employment development on this site. However, again, for completeness it is our view that this site should be included in the local plan as an employment site allocation. We are concerned that as currently drafted there is a potential for a policy conflict between the HNP and the Local Plan, and as such request that the latter be amended to include this site as an employment site.

Given the advanced stage that the HNP it is likely that it will be a 'made' Neighbourhood Plan by the time that the Local Plan progresses to the next stage in consultation, it is our view therefore that consideration should be given by the LPA to the contents of the Neighbourhood Plan. It is our opinion The Old Brickworks should be identified as a Key Employment Area by the Local Plan in order to correspond with the objectives and strategy contained in the Neighbourhood Plan.

It is our view that given the existing employment use of The Old Brickworks it would be a logical inclusion as a KEA, similarly, given the allocation of the land north of The Old Brickworks as an employment site in the HNP, it should also be included as an employment site allocation in the draft Local Plan. It is considered that this would avoid any potential conflict with the policies contained in the HNP and the Local Plan.

It should be noted that those housing sites which have been allocated by Henfield Parish in the Neighbourhood Plan and been included as potential housing site allocations in the draft Local Plan, we submit that the same approach should be taken with the employment sites which have been identified and allocated in the Henfield Neighbourhood Plan.

Conclusion

In summary, it is our view that for the reasons stated above, the land north of The Brickworks (site SA689) would be eminently suitable as an employment site, and should be included as an additional potential employment site allocation within Strategic Policy 6. The addition of this site to those listed in Strategic Policy 6 would help to provide additional employment floorspace as required in the District, particularly assisting to provide this need in the south of the District.



We also consider that the existing employment site at The Old Brickworks should be identified as a KEA. This is an existing established employment site, and it is our view that it would be completely logical to include this Site as a Key Employment Area. It is a well utilised site which is currently fully occupied by two established local businesses. It should also be noted that by including this site approximately 3 hectares of additional land will be available for employment space, and this will help make a significant contribution to the need for commercial space in the District, particularly in the south.

It should be noted that both of these sites have been allocated or identified as an employment site within the Henfield Neighbourhood Plan, and to include them as a potential Key Employment Area and employment site allocation within the Local Plan document would be considered to reflect the wishes of the local community.

Yours sincerely

A handwritten signature in black ink, appearing to read "Lisa Da Silva".

Lisa Da Silva
Associate Planner
For and on behalf of DMH Stallard LLP