

Response To Representations Made In Respect of Aim 2 of West Grinstead Neighbourhood Plan: Land North And South of Star Road

Introduction

The Consultation Statement prepared following the Regulation 14 pre submission consultation provides a summary of all the comments received. The purpose of this paper is to address the comments received in respect of Aim 2. In particular it explains;

- how the process of identifying and assessing potential sites was approached
- the methodology for assessing housing need
- the response to government guidance on indicative housing figures
- the evolution of Aim 2 North and South of Star Road
- the interplay of Aim 2 with the Horsham District Planning Framework and the emerging Local Plan Review

It also addresses comments made in relation to the advantages, viability and deliverability of Aim 2, particularly those received from developers and their consultants who are promoting housing sites within the Neighbourhood Plan area. Comment is also made on specific issues such as those regarding existing rights of way at the Huffwood Estate and issues highlighted by statutory undertakers and consultees.

List of References

In respond to the representations received reference is made to;

- i) The Neighbourhood Plan Questionnaire circulated in March 2014.*
- ii) The Neighbourhood Plan Questionnaire, analysis of Question 7.*
- iii) NPWG Estimation of Future Housing Needs in West Grinstead.*
- iv) Government advice in respect of indicative housing figures.*
- v) The background paper, Relocation of the Huffwood Trading Estate to Land South of Star Road.*
- vi) The Memorandum of Understanding signed by the principal land owner of the Huffwood Estate and the owners of the land south of Star Road.*
- vii) Policy 7 (Key Employment Areas) of the Horsham District Planning Framework and Review of the Local Plan*

1) History In respect Of Housing Element Of West Grinstead Neighbourhood Plan

- 1.1 A questionnaire was distributed to every household within the parish in March 2014. It included seven questions relating to housing under section A and invited residents to indicate on maps where they thought new housing could be located within the parish.
- 1.2 The analysis of Question 7 of the Neighbourhood Plan questionnaire was completed in September 2014, many sites were initially suggested and the preferences put forward in terms of most to least mentioned were;

1. **Brownfield Sites**
2. Small Groups of Houses
3. Different Locations
4. Individual Houses
5. Large Groups of Houses
6. Infill Housing
7. No Housing At All

1.3 On the 5th and 6th December 2014 an exhibition was held over two days in Partridge Green which invited local residents and interested parties to comment on various issues and included a flier asking for potential housing sites to be put forward as part of the Call For Sites process. The feedback on the most suitable location for new housing development had the **Huffwood Estate** as the most popular location and also strong support for the use of **brownfield land**.

1.4 A letter was sent to local landowners and developers in March 2015 asking if they wished any of their land to be put forward as a location for possible future development and requesting the return of a form by the 10th April 2015. In addition as part of the Call For Sites process similar requests for sites were included on the Parish Council Web Site, Parish Council Notice Boards, in the Parish Newsletter, Thirteen Eight and The County Times.

1.5 On 16th May 2015 a public exhibition was held at Partridge Green and also Dial Post to advise the local community of the sites put forward in response to the Call for Sites and invite their comments.

1.6 As highlighted in the background paper **Relocation of the Huffwood Trading Estate to Land South of Star Road** under Section 6) Stakeholder Support;

A total of fourteen sites were put forward, nine in Partridge Green and five in Dial Post. Members of the local population were asked to review the sites and put forward their three most preferred and the results were analysed in three different forms;

a) number of votes

b) factored results which allocated a score to each preference i.e. first preference got three points and third preference got one point

c) aggregate scores, scores were taken from both of the first methods and then the least favoured score was subtracted from the most favoured score for each site. This removed the less polarised and contradictory results leaving the consensus opinion.

Each form of analysis demonstrated that the most popular sites for development were brownfield. With the Huffwood being the most popular followed by the Blakers workshop site in Dial Post and the Brightstone site to the south of Star Road. These sites also had the lowest scores when the least preferred votes were analysed.

Of the large greenfield sites put forward the land to the south of Star Road also showed to be a more popular / less unpopular choice than the other large greenfield sites put forward.

1.7 The fourteen sites were;

- P1 Huffwood Trading Estate
- P2 North of the Rosary
- P3 North of the Rise
- P4 Brightstone Site
- P5 South of Star Road
- P6 Dunstans Farm
- P7 Field behind Dunstans
- P8 Corner of B2135 & Mill Lane
- P9 Opposite Windmill Pub
- D1 Land Owned by Tomkins Trust
- D2 West of Dial Post owned by Knepp Estate
- D3 West of Dial Post village owned by Ms Mills
- D3 Oaklands
- D5 Blakers

1.8 The analysis of the forms completed at the two events showed that;

Partridge Green – Most Popular sites in order of most popular first left to right:

P1, P4, **P5**, P2, P9, P3, P8, P6,P7

Partridge Green – Least Popular sites in order of least popular first left to right:

P2, P8 ,**P5** ,P9, P6 ,P7, P3 & P4, **P1**

Dial Post – Most Popular sites in order of most popular left to right:

D5, D4, D2, D1,D5

Dial Post – Least Popular sites in order of least popular first left to right:

D2, D1 &D3, D4, D5

Huffwood was the most popular site with 113 scores in the 1-3 popular category and had only 9 in the least popular category.

1.9 In September 2016 landowners and developers who had put forward sites in the Call For Sites were given the opportunity to put forward their proposals to the local community.

Two events were organised, on the 25th September presentations by landowners / developers of the sites within Partridge Green were given and on the 26th September a display of the sites put forward in Dial Post was put on.

The events were publicised in Thirteen Eight, The Parish Newsletter, the Parish Council Web Site, Facebook, banners in both Partridge Green and Dial Post and Notices on the telegraph poles and other prominent positions around both villages.

Emails were also sent to people who had attended previous events. Members of the public were provided with forms to give feedback on each proposal.

Only comments mentioned three or more times were recorded. In respect of Partridge Green some of the main comments were;

84 – Preference for **preserving Greenfield sites** and the rural character of the Parish

83 – **Preference for building on Brownfield sites**

33 – Preference for small scale development – large developments would alter the character of the Parish

30 – Preference for building within the current built up area of PG

30 – Retention of small businesses and encourage more on Star Road

27 – Preference for building in the centre of PG to enable ease of walking to shops and other services

18 – Maintain strategic gap between settlements

1.10 Following the various consultation exercises the Working Group started to prepare site assessments and analyse Housing Need.

1.11 Using a site assessment template provided by Working Group's planning consultant's in the autumn of 2015 a start was made on assessing the site's put forward and in particular consideration was given to;

- The site context
- Biodiversity
- Heritage Assets
- Landscape
- Flood Risk
- Accessibility of local services
- Availability of utilities

The site assessments were completed in January 2016.

1.12 A start was also made on assessing Housing Need. The methodology used for calculating housing numbers had been used elsewhere for other Neighbourhood Plans and been accepted by Examiners.

1.13 The initial assessment of Housing Need was produced in June 2015 based upon three methodologies but following advice this was updated to include four later in the year. Using four different methods of calculation the updated assessment was produced in February 2016 as outlined in the background paper *NPWG Estimation of Future Housing Needs in West Grinstead*. The four options produced a wide range of outcomes.

- A - Estimation based upon Household Formation, 0-284 homes.
- B- Affordable Housing Needs survey from 2012, 126-176 homes.
- C-HDPF (Horsham District Planning Framework) Neighbourhood Planning housing target, 30-45 homes.
- D-HPDF Housing Target – February 2016. 53 homes.

1.14 The justification of the methodology used was agreed at a meeting of the Working Group on 3rd May 2016. The four methodologies were considered together along with feedback from local residents, and in particular the priorities put forward, to produce a range for new housing of sixty to seventy units over the original plan period to 2031.

2) Revision Of National Planning Policy In Respect of Indicative Housing Figures

- 2.1 During the first half of 2017 the issue of including market signals within the assessment of housing numbers was highlighted by Horsham District Council.
- 2.2 A discussion followed as to how best to address this requirement, particularly in light of the concerns expressed over the reliability of using this approach at parish level which would mean available data could be extremely limited potentially producing skewed results due to few property transactions or the predominance of particular housing types.
- 2.3 At a meeting of the Working Group in February 2018 a discussion took place regarding the Government Housing Paper which suggested a housing numbers standardised calculation method was due to come out in the summer of 2018 within the updated NPPF. The impact of this at parish level was not clear and further advice was awaited from Horsham District Council.
- 2.4 Horsham District Council carried out a health check of the proposed Neighbourhood Plan in the spring of 2018 and in response made comment that it noted the plan stipulated seventy dwellings up to 2031, but was looking to allocate forty through one allocation leaving a shortfall of thirty. This shortfall could not be made up through windfalls which by their very nature could not be relied upon to deliver the level of housing aimed for in the Neighbourhood Plan.
- 2.5 Following the publication by the Government of the revised National Planning Policy Framework (NPPF) on 24th July 2018 and the introduction of a standard methodology to calculate housing need, taking the Government's household growth projections and applying an affordability ratio, it was agreed that Horsham District Council should be contacted and asked to confirm an indicative number in respect of the housing West Grinstead would be expected to accommodate.
- 2.6 In particular, Para 65 of the NPPF set out that: *“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re- testing at the*

neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement”.

- 2.7 Paragraph 66 then stipulated that: *Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority”.*
- 2.8 Horsham District Council were requested to provide an Indicative Housing Requirement Number in August 2018 and responded at the end of October to confirm that their indicative number was 110 dwellings.
- 2.9 The Working Group contacted Horsham District Council in December 2018 to ask if it would be possible to proceed with the housing allocation in the current plan but agree to an early review.
- 2.10 A meeting took place with Horsham District Council on 14th Feb 2019 to discuss the options in respect of a way forward. Four options were put forward and considered by the Working Group at a meeting on the 19th Feb 2019.
- I. Go forward with the proposal for sixty to seventy dwellings and include a proposal for an early review in 2021 when the HDC Local Plan Revision will be “made” and therefore the numbers allocated to the Parish, finalised.
 - II. Use the indicative number of 110 and allocate a further site. It would however still mean reviewing the Neighbourhood plan 2021 when final figures for the parishes would be known.
 - III. Move forward to Reg 14 without allocating sites and leave HDC to do the site allocations in their Local Plan Revision.
 - IV. Move forward to Reg 14 with a Plan which does not allocate sites but which has a strategy policy for residential sites and site allocations that would be incorporated in the Plan in 2021 following a review.
- 2.11 It was felt that options II. and III. would necessitate a departure from the key strategy of the Neighbourhood Plan, but agreed that options I. and IV. would be worth considering further although there were still concerns that Option 1 could also mean a departure.
- 2.12 On the 29th April 2019 Horsham District Council confirmed their provisional agreement for the Neighbourhood Plan to be progressed on the basis of Option IV with the expectation of taking an allocation of development derived from the standard methodology.
- 2.13 On the 19th May 2019 the Working Group confirmed to HDC that on this basis they would finalise the Draft Neighbourhood Plan for Regulation 14 Consultation utilising a Community Aim encouraging the Brownfield Land at Huffwood to be redeveloped for residential use, with the relocation of the commercial activity to Land South of Star Road.

3) Evolution Of The Proposals For Residential Development At The Huffwood Estate And Commercial Development On The Land South Of Star Road.

- 3.1 In October 2014 local businesses, community groups within the Parish and neighbouring Parish Councils were contacted regarding West Grinstead Neighbourhood Plan. Including businesses located on the Huffwood Estate.
- 3.2 On the 30th January 2015 the Working Group wrote to the majority landowner of the Huffwood Estate advising that two substantial consultation exercises had been completed and the process of starting to look at the sites that had been put forward as being potentially suitable for development had commenced. It was highlighted that the Huffwood Trading Estate had been identified by a significant number of local residents as a potential site for future residential development because of its location within the centre of Partridge Green.
- 3.3 The letter highlighted that this proposal could only be progressed if **an alternative location could be found for the businesses currently based on the estate.** The letter also made reference to a site on the neighbouring Star Road Estate having received planning consent for fifteen industrial units (40,000 sq. ft.) some time before and that the site (the Brightstone Site) had recently been placed on the market.
- 3.4 Members of the working group met with the majority landowner of the Huffwood Estate on the 25th February 2015. He expressed a willingness to progress discussions and requested that a meeting be organised with Horsham District Council as a first step to discuss the proposal and in particular the relocation of the existing businesses.
- 3.5 A meeting took place between the majority landowner and one of the local councillors for West Grinstead and senior officers at HDC on 21st April 2015. Following the meeting the Working Group wrote to HDC on the 27th April 2015 suggesting a joint venture between the majority landowner and the District Council to progress the proposal. A further meeting took place with HDC on the 29th July 2015 to discuss a possible joint venture.
- 3.6 The possibility of relocating the Huffwood Estate to the Brightstone site continued to be at the centre of the proposal until the 17th November 2015 when the owner of the Brightstone Site confirmed that discussions were taking place over the site with a potential owner occupier.
- 3.7 Following the consultation events held at the end of September 2015 the Working Group had started to tentatively discuss the possibility of asking the owners of the land South of Star Road if they would consider putting their site forward within the Neighbourhood Plan for commercial use rather than residential use as it could potentially provide the opportunity to relocate other commercial users located north of Star Road onto their site freeing up further brownfield land for re-development to residential in the future. The proposal was raised at a meeting with HDC on the 11th November 2015. HDC highlighted a number of issues in particular that as the Huffwood Estate and Star Road formed part of a key employment area any proposal to re-develop any part of the area for residential use had to make provision for replacing any commercial space that was lost.
- 3.8 A further business questionnaire was circulated in October 2015 by the Working Group to engage with local businesses.

- 3.9 Following an approach to the owners of the land south of Star Road their planning consultant confirm by telephone on the 24th November 2015 that his client's would consider a commercial allocation of their land. This was subsequently confirmed in writing on the 10th February 2016.
- 3.10 A meeting with Horsham District Council and the owners of the land south of Star Road to discuss the specific proposal of allocating the land south of Star Road for commercial development, relocating the Huffwood Estate onto the land and then pursuing a strategy of encouraging other occupiers of the land north of Star Road to relocate onto the land south of Star Road took place on the 14th March 2016 and it was agreed that the owners of the land south of Star Road would enter into discussions with the majority owner of the Huffwood Estate.
- 3.11 Work to progress the proposal by the two landowners continued throughout 2016. On the 24th November 2016 a further meeting took place between members of the working group their planning consultants and officers from HDC. HDC highlighted Policies 7 & 9 of the HDPF and that there was a need to demonstrate that there would be no loss of employment as a result of the reallocation of the employment space to land south off Star Road. In addition it would be necessary to demonstrate that the units proposed for the new employment area would be available prior to the residential development going forward and that they would provide a good mix of employment space not just large units. The Working Group raised the issue of other occupiers of the land north of Star Road relocating to the land south of Star Road freeing up further sites to the North for residential use, and asked whether this could be included as a Vision in the Neighbourhood Plan. HDC confirmed that it could not be included as a policy but could be an aim/aspiration in the Neighbourhood Plan.
- 3.12 At the beginning of 2017 the Working Group started to put together the background paper *Relocation of the Huffwood Trading Estate to Land South of Star Road*. In particular it covered the justification for the proposal, how it reflected existing planning policies, the amount of stakeholder support for the proposal and deliverability. Following input from both landowners the document was sent to HDC for approval on the 17th May 2017. There were significant benefits to the proposal as listed in the background paper, in particular:
- *the provision of additional housing within the centre of Partridge Green on an existing brownfield site.*
 - *the opportunity to introduce some momentum into the replacement of existing ageing commercial space with modern space on an unused green field site on the southern boundary of the built up area of the village, extending to over four hectares.*
 - *maintaining, improving and increasing existing commercial / employment space within the Parish.*
 - *the opportunity to extend the Downs Link through the village significantly reducing the current gap which necessitates the use of the Steyning Road for approximately 300 metres.*
 - *the opportunity to better safeguard and manage the historic Ash Wood.*
 - *the opportunity to create a long term strategy for the future development of Partridge Green that would encourage other commercial occupiers to the north of Star Road to migrate south*

on to the land designated for commercial development south of Star Road freeing up further brownfield land for future residential development.

- *the removal of a significant amount of commercial traffic from the centre of Partridge Green.*
- *an alternative to the redevelopment of more open green field sites to the north of the village that create a buffer between the three distinct settlements of Partridge Green, Jolesfield and Littleworth enabling the rural character of the area to be protected and maintained.*
- *a more sustainable development pattern making better use of the land allocated for development.*
- *allowing the village to develop over a period of time on an acceptable scale without dramatically impacting upon the surrounding rural area.*

3.13 The Neighbourhood Planning Officer from HDC attending a meeting of the Working Group on the 18th July 2017 to provide feedback on the background paper submitted in respect of the Huffwood Estate and land South of Star Road. The Working Group asked him what type of evidence HDC and eventually an Examiner, would require in order to be able to establish the deliverability of the Huffwood Star Road relocation. It was agreed to set up a meeting with the land owners and HDC (Economic Development and Planning Officers) to address this.

3.14 The Meeting with HDC took place on the 13th Nov 2017. HDC highlighted that if the proposal were to succeed in the NP both with regard to challenges from other developers and through Examination, there needed to be a degree of certainty with regard to its deliverability. This could be provided via a Memorandum Of Understanding, signed by the parties to the scheme. HDC had called the meeting to see if there was anything they could do to facilitate this. HDC also commented upon the deliverability of the scheme indicating that it should be at the front end of the Neighbourhood Plan which meant within the first five to ten years of the plan period which extended to 2031 in line with the HDC Local Plan, and that it was important to monitor that there would be no net loss of employment sites, and that additional sites were required, not just replacement sites. HDC also commented that Horsham District was an attractive location for industry but there was currently little to offer with regard to locations for industry and HDC wanted to seize every opportunity to increase the supply. Both landowners highlighted that they were looking for a degree of certainty that they would obtain the required planning consent. HDC explained the Neighbourhood Plan process and its eventual weight within the planning system. If the proposed scheme conformed to the Basic Conditions of The NPPF and was in line with the HDC Local Plan then there was no reason for the scheme to fail other than via deliverability. The Examiner would need reassurance in this regard and a document signed by both parties in agreement to the principle not the detailed arrangement would provide this certainty. The document itself would not be legally binding. HDC also mentioned the funding initiatives for industrial development available and offered to facilitate a meeting with an outside body.

3.15 On the 31st January 2018 the Working Group forwarded the first draft of MOU to the landowners and HDC. On the 14th March 2018 there was a further meeting between members of the Working Group, HDC and the landowner's representatives. The Neighbourhood Plan

required minor finishing touches before being ready for submission to HDC for informal comments. The discussions included the financial arrangements whereby start up units could be built out on the land south of Star Road before any residential development could go ahead on the Huffwood Estate. Various options were discussed including the Grand Places Fund as Part of Coast To Capital initiative funded by Government, and the possibility that HDC might be interested in a partnership as HDC was looking for opportunities to invest but the return needed to be at least 6%. It was considered that the residential development on Huffwood could be achieved by 2023. HDC also advised that they were currently reviewing the HDPF with regard to economic strategy and that the Huffwood and Star Road arrangement was mentioned in the material to shortly be put before the Council and then to be consulted upon.

3.16 There were protracted discussions regarding the wording within the MOU but it was eventually signed by both landowners on the 4th October 2018.

4) Interplay And Compliance Of Aim 2 With Policy 7 Of The HDPF And The Current Review Of The Local Plan

4.1 Chapter 5 of the HDPF covers economic development within the district over the Plan period. It highlights the need to build a strong, resilient and diverse economy and among the issues it seeks to address through the policies set out are;

- The lack of employment land and building stock in terms of type and size.
- The need to improve the quality of the building stock to assist existing businesses and attract new businesses into the district.
- The need to provide opportunities for existing businesses to grow expand and change to meet modern business demands highlighting the design of industrial estates and offices.
- Provide opportunities for small and medium businesses and business start-ups.
- Enhance the rural economy by such measures as the diversification of rural employment space.

4.2 Paragraph 5.8 states the HDC seeks.....*to address this by providing additional, high quality employment floor space within the district, to help support local employment opportunities close to where people live. It also seeks to ensure that existing Key Employment Areas as shown on the policies map are retained for employment uses and enable the redevelopment, regeneration, intensification and smart-growth of existing sites.*

4.3 Policy 7 of the HDPF sets out that sustainable employment development in Horsham district for the period up to 2031 will be achieved by a number of aims including;

- Redevelopment, regeneration, intensification and smart growth of existing employment sites.
- The formation and development of small, start-up and move-on businesses..... by encouraging provision of small units through development proposals.
- Retention of Key Employment Areas, for employment uses.
- Encouraging sustainable local employment growth through Neighbourhood Development Plans.

- Identifying additional employment areas to meet the need for appropriate new business activity.
- 4.4 **It is the view of the Working Group that the proposal Set out as Aim 2 in the Neighbourhood Plan is entirely consistent with these overall aims.**
- 4.5 The review of the Local Plan also highlights a number of issues that are relevant to the proposal to Allocate the land south of Star Road for commercial development and relocate the Huffwood Estate onto the site.
- 4.6 For example the Review states that research identified that 69% of the commercial space within the district was built before 1980, and there is a lack of employment land and employment floor space to meet the future needs of the district over the plan period.
- 4.7 It also sets out that evidence suggested that *there was steady demand for business space, particularly from small firms requiring premises of 5-6,000 sq. ft. and under. Occupancy rates on existing employment sites were found to be high with a shortage of industrial space reported across all types and sizes. A lack of surplus space of industrial land which would enable market 'churn' (a natural turnover of business premises) was also identified.*
- 4.8 Paragraph 2.10 of the Review makes reference to Policy 7 of the HDPF identifying a number of 'Key Employment Areas' which would be expected to be retained for employment uses, but *the policy also supports redevelopment, regeneration, intensification and smart-growth of existing sites.....*
- 4.9 Paragraph 2.15 of the Review reiterates that *existing employment stock in the district is often old and of low to moderate quality which does not often suit modern business requirements. Businesses are now increasingly seeking high quality environments with ample space, landscaping and good levels of parking and accessibility.*
- 4.10 Table 4 titled, **Key Employment Area Review Results in the Local Plan Review** comments on the Huffwood Estate and Star Road as follows; *Retain both the Huffwood and Star Road designations, but as they adjoin each other amend and merge as a single designation. A potential option for the longer term may be to consider the feasibility of relocating existing businesses to a new or existing employment site elsewhere around Partridge Green, potentially through the neighbourhood planning process. This would however require agreement from landowners.*
- 4.11 Table 5 titled, **Sites Put Forward For Consideration For Commercial Use in the Local Plan Review** also makes reference to the Huffwood Estate and Star Road Estate in more detail and states; *Huffwood and Star Road Trading Estates are two separate but adjoining employment areas located in Partridge Green. Both sites are similar in age with buildings ranging in age from the 1960s onwards of primarily B2 and B8 uses. Units on the Huffwood site are generally smaller, those on the Star site are larger in scale. The Star site has also recently expanded with the provision of more modern units, which demonstrate that the area is performing well and is providing significant employment for the central part of the district. Further land to the south of the Star Road Industrial Estate has been proposed as a potential location for employment development. The site consists of scrubby grassland. Ash Wood area of woodland abuts the site to the north east and the eastern and southern boundaries comprise agricultural land, with the exception of the far south eastern corner of the site which is a sewage treatment works. Although the site is not accessed from the strategic road network access to this site is reasonable, and could potentially be achieved through the existing industrial estate. Public transport to the village is limited, but is close to local facilities in Partridge Green for local shops. This*

site is considered to have potential for employment development including an expansion of the existing site. There may be some potential for consolidation or relocation of existing uses on the Star and Huffwood Estates, but there should be no net loss of land for employment as a result of any such proposals. The delivery of such a scheme would however require the agreement of both landowners. It may also be possible for such development to come forward through a neighbourhood plan, should such a proposal be providing local scale rather than strategic employment development.

- 4.12 It is the view of the Working Group that the proposal Set out as Aim 2 in the Neighbourhood Plan is also aligned with emerging planning policy set out in the Local Plan Review, and in particular supports the strategic aim of HDC as planning authority to increase the amount of employment space to take account of the increase in housing and population growth during the plan period.**
- 4.13 Recent development of new space on the Brightstone site and extensions of other units on the existing industrial sites to the south of Star Road support the view that the location is viable.

5) Specific Comments In Respect of Aim 2

- 5.1 **Advantages:** The significant benefits of Aim 2 are set out in paragraph 3.2 above.
- 5.2 **Viability:** Various concerns were expressed about the viability of Aim 2. In response to these concerns the following points are relevant;
- 5.2.1 The submission from Crickmay highlights that *the proportionate level of enquiries for industrial and warehouse accommodation from occupiers remains good with very limited supply, and goes onto comment that considerable stock has been lost over recent years to residential development and due to the disparity in land values it's easy to see why.*
- These factors highlight the viability of Aim 2 in that demand sustains and increases rental levels and that residential land values continue to exceed those for commercial.
- 5.2.2 The Crickmay submission also comments on the potential cost of constructing replacement units for the ones located on the Huffwood Estate, suggesting that this could be well in advance of £1000 per square meter. There is no reason to believe that the construction costs on the land south of Star Road would be greater than anywhere else within the district. Whilst it is expected that the replacement units would be built to a good standard there is no expectation that they would be fitted out to the level that this suggests. In addition the owners of the land south of Star Road have accepted that in return for supporting Aim 2 and the development of all of their site (excluding the historic woodland and other non-developable areas) through the Neighbourhood Plan process, the land value attributable to the area accommodating the replacement units for the Huffwood Estate may be less than for other parts of the site. This approach allows for a degree of subsidisation or enabling, if it proves necessary, to re-create units similar to the existing ones on the Huffwood Estate.
- 5.2.3 The Crickmay submission also questions if the higher rents that are likely to arise will be affordable. This disregards the possibility that some of the occupiers may be able to acquire new units on a freehold basis. Property occupancy costs also need to be considered in tandem with other business costs. It is only fairly recently that commercial rents within the district have recovered to the levels achieved at the height of the boom in 1990 / 1991. Other costs most notably staffing, (recently because of increases to the minimum wage) and utility costs have

increased significantly meaning that rent does now represent a lower proportion of overall business costs than in the past. The small business rate relief now available for smaller commercial premises also makes a significant contribution towards reducing overall property related occupancy costs. There is evidence of increases in historic levels of rent being achieved, particularly if serviced space is provided on a flexible basis, demonstrating that occupiers will pay more in return for the benefits that this provides.

5.2.4 The Crickmay submission also questions whether the owner of the majority of the Huffwood Estate would wish to dispose of an asset that is performing well in terms of occupancy. The fact that he has engaged in discussions for five years suggests that the answer to this is yes, but he has also highlighted that the development requires active ongoing management and is also aware that substantial modernisation will be required if it is to continue in its current use in the medium to long term.

5.2.6 Sigma in their submission suggest that moving an ageing industrial estate from the centre of the village to a more peripheral location on the edge of the village will create *an unnecessary risk to the character and vitality of the village as a whole*. This analysis overlooks that Aim 2 will re-create a similar local asset built to higher and more modern standards in a more suitable location with superior road access and in turn allow new housing to be built in the centre of the village closer to existing shops and services.

5.3 **Deliverability:** Various concerns were also expressed about the deliverability of Aim 2. In response to these concerns the following points are relevant;

5.3.1 It should be noted that the discussions to progress the proposals outlined in Aim 2 have been ongoing for five years which has provided ample time for the Working Group, land owners and Horsham District Council as the local planning authority to consider the implications and the best way to implement the proposals.

5.3.2 The conflict created in planning policy terms by the potential loss of a key employment site was highlighted but this was addressed right at the outset and the issue of finding an alternative site to replace the Huffwood Estate if it was redeveloped for housing was treated as a priority. It is considered that the land south of Star Road provides the best solution to this, in terms of planning policy, sustainability and minimising the disruption caused to existing businesses on the Huffwood Estate.

5.3.3 It is also suggested that some of the occupiers of the Huffwood Estate may have security of tenure under the 1954 Landlord and Tenant Act. This does not reflect the position as outlined by the owner of the majority of the site in respect of his tenants who are all in occupation on short term flexible agreements, where vacant possession can be obtained at relatively short notice.

5.3.4 Sigma have also suggested that relocating existing businesses from Huffwood to south of Star Road could financially destabilise them but don't explain why, and overlook that being flexible and able to respond rapidly to changing situations is a pre-requisite for modern businesses not least because of the changes to working practices that technological advances have created.

5.3.5 The co-ordination of the relocation of the existing Huffwood Estate occupiers has also been raised. This has been actively considered over the last five years and the owners of the land south of Star Road have appreciated during this period that the re-creation of industrial units on their land to cater for the type of occupiers that are currently based on the Huffwood Estate is a

critical factor in terms of support for the development of their land in the West Grinstead Neighbourhood Plan. The expectation is that this part of the development of their site would be implemented first and that the existing occupiers of the Huffwood Trading Estate would be given first refusal in respect of the new units.

- 5.3.6 Crickmay also pointed out that the Huffwood site would require demolition and *inevitably there would be the need for remediation of any contamination that may exist*. No evidence that the site is contaminated has arisen during the last five years and the advantages of being able to recycle a site of this size for housing use in the centre of Partridge Green justify the additional cost of demolition.
- 5.3.7 Gladman have suggested that there is a mismatch between the aspiration of Aim 2 and the supporting text. To clarify the position the relocation of the existing Huffwood Estate is viewed as a priority to occur in the short term whilst the relocation of other existing users to north of Star Road to the south of Star Road is considered a more long term objective but still something that should occur within the current plan period. There is also no suggestion that this process should apply to all the current occupiers within the area to the north of Star Road.
- 5.3.8 The owners of the land south of Star Road are currently progressing the background work to enable them to submit a planning application on their land. They have completed the pre-application stage and are currently awaiting the completion of a viability study on the site, an ecology survey will be completed in May. The concerns about the impact upon Ash Wood of the development and the impact on the development by the proximity of the sewage treatment plant are both to be addressed by way of landscape buffers and there will also be an ecology mitigation area.
- 5.4 **Rights of Way:** One of the existing terrace of units on the Huffwood Trading Estate is split into a number of different ownerships. Concerns have been expressed about the rights that accompany the ownership of this part of the Estate. The position is confirmed by a Conveyance of 29 September 1981 which highlights that a right of way exists over the eastern side of the Estate but the position of this can be moved. In addition seven parking spaces are included within the title but the position of these can also be moved.