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Cabinet

Thursday, 23rd November, 2017 at 5.30 pm
Conference Room, Parkside, Chart Way, Horsham

Councillors:	Ray Dawe	Leader
	Jonathan Chowen	Deputy Leader and Leisure and Culture
	Philip Circus	Waste, Recycling and Cleansing
	Brian Donnelly	Finance and Assets
	Gordon Lindsay	Local Economy
	Kate Rowbottom	Housing and Public Protection
	Claire Vickers	Planning and Development
	Tricia Youtan	Community and Wellbeing

You are summoned to the meeting to transact the following business

Tom Crowley
Chief Executive

Agenda

	Page No.
1. Apologies for absence	
2. Minutes	5 - 10
<p>To approve as correct the minutes of the meeting held on 12th October 2017 (<i>Note: If any Member wishes to propose an amendment to the minutes they should submit this in writing to committeeservices@horsham.gov.uk at least 24 hours before the meeting. Where applicable, the audio recording of the meeting will be checked to ensure the accuracy of the proposed amendment.</i>)</p>	
3. Declarations of Members' Interests	
<p>To receive any declarations of interest from Members of the Cabinet</p>	
4. Announcements	
<p>To receive any announcements from the Leader, Cabinet Members or the Chief Executive</p>	
5. Public Questions	
<p>To receive questions from and provide answers to the public in relation to matters which in the opinion of the person presiding at the meeting are relevant to the business of the meeting</p>	
6. Medium Term Financial Strategy 2018/19 to 2021/22	11 - 28
<p>To receive the report of the Cabinet Member for Finance and Assets</p>	
7. Approval of Multi-Functional Device Tender Process	29 - 32

- To receive the report of the Cabinet Member for Finance and Assets
8. **Draft Gypsy and Travellers Site Allocation Document Preferred Strategy** 33 - 190
To receive the report of the Cabinet Member for Planning and Development
9. **Horsham Town Centre Vision Statement** 191 - 346
To receive the report of the Leader
10. **Play Strategy 2017-2027** 347 - 384
To receive the report of the Cabinet Member for Leisure and Culture
11. **Policy for Issuing Fixed Penalty Notices** 385 - 394
To receive the report of the Cabinet Member for Community and Wellbeing
12. **Affordable Housing Investment** 395 - 404
To receive the report of the Cabinet Member for Housing and Public Protection
13. **Discretionary Disabled Facilities Grants** 405 - 414
To receive the report of the Cabinet Member for Housing and Public Protection
14. **Implementation of new provisions under the Housing and Planning Act 2016** 415 - 436
To receive the report of the Cabinet Member for Housing and Public Protection
15. **Sussex and Surrey Joint Fuel Procurement e-auction - contract for the supply of fuel for the Council's vehicle fleet** 437 - 442
To receive the report of the Cabinet Member for Waste, Recycling and Cleansing
16. **Overview & Scrutiny Committee**
To consider any matters referred to Cabinet by the Overview & Scrutiny Committee – there are no matters outstanding
17. **To note the Forward Plan** 443 - 446
18. **To consider matters of special urgency**
19. **To consider the following exempt or confidential information:**
- a) **Acquisition of Investment Property in Billingshurst** 447 - 452
(Exempt by virtue of Paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972 - Information relating to the financial or business affairs of any particular person (including the authority holding that information))
To receive the report of the Cabinet Member for Finance and Assets

Cabinet
12 OCTOBER 2017

Present: Councillors: Ray Dawe (Leader), Philip Circus (Waste, Recycling and Cleansing), Brian Donnelly (Finance and Assets), Kate Rowbottom (Housing and Public Protection), Claire Vickers (Planning and Development) and Tricia Youtan (Community and Wellbeing)

Apologies: Councillors: Jonathan Chowen (Deputy Leader and Leisure and Culture) and Gordon Lindsay (Local Economy)

Also Present: Councillors: Karen Burgess and David Skipp

EX/41 **MINUTES**

The minutes of the meeting of the Cabinet held on 21st September 2017 were approved as a correct record and signed by the Leader.

EX/42 **DECLARATIONS OF MEMBERS' INTERESTS**

There were no declarations of interest.

EX/43 **ANNOUNCEMENTS**

Councillor Tricia Youtan, Cabinet Member for Community and Wellbeing announced that Councillor Karen Burgess had replaced Councillor Billy Greening as her Deputy Cabinet Member.

EX/44 **PUBLIC QUESTIONS**

No questions had been received.

EX/45 **HORSHAM DISTRICT DRAFT BROWNFIELD LAND REGISTER 2017**

The Cabinet Member for Planning and Development reported that the preparation, maintenance and publication of a brownfield land register was a new legal requirement, introduced by the Housing and Planning Act 2016. Therefore, a draft register had been prepared in line with best practice for publication for consultation.

The purpose of the register was to identify brownfield land within the District which was considered to be suitable for housing development. The register comprised two parts:

Part 1 was a list of all sites that were considered to meet the legislative criteria of being 'suitable, available and achievable' for development.

Part 2 of the register would comprise only those sites in Part 1 that the local planning authority had decided would be suitable for a grant of Permission in Principle. If no sites were considered to meet the criteria for Permission in Principle, Part 2 of the register could be left empty.

The draft Brownfield Land Register proposed 39 sites for inclusion in Part 1, all of which had been identified from sites contained in the District's Strategic Housing and Employment Land Availability Assessment (SHELAA); through planning applications; or were sites allocated for development in the Council's adopted planning policy documents. None of these sites were considered suitable for a grant of Permission in Principle and it was therefore recommended that there were no entries in Part 2 of the Register this year. Any decision to include land in Part 2 of the register and to grant planning permission in principle was specifically excluded from being an Executive Decision under Regulation 19 of The Town and Country Planning (Brownfield Land Register) Regulations 2017. Any future recommendation to include site(s) in part 2 of the register would therefore be a Council decision unless the Council sought to delegate it.

The Council would take account of comments received, make any necessary amendments and publish the register on the Council's website by 31st December 2017. If any substantive changes were proposed in response to the consultation, it would be necessary to prepare an update in early 2018 for approval by Cabinet. The Brownfield Land Register would be reviewed and updated annually.

The proposed content of Brownfield Land Register had been discussed by the Planning and Development Policy Development Advisory Group and a small number of factual amendments had been made to the register in light of the discussion.

RESOLVED

- (i) That the publication of the draft Brownfield Land Register for a four week period of consultation from 20th October to 17th November 2017 be approved.
- (ii) That the Cabinet Member for Planning and Development be authorised to agree minor editorial changes to the draft Brownfield Land Register.
- (iii) That the Cabinet Member for Planning and Development be authorised to approve the final Brownfield Land Register for publication by 31st December 2017.

REASONS

- (i) To ensure that the statutory requirements in the Town and Country Planning Act as inserted by the new Housing and

Planning Act 2016 and the Town & Country Planning (Brownfield Land Register) Regulations 2017, are met.

- (ii) It is appropriate to invite public participation in the preparation of a new planning document for the District, in accordance with the Statement of Community involvement, February 2017.

EX/46 **100% LOCALISATION OF BUSINESS RATES 2018/19 PILOT SCHEME**

The Cabinet Member for Finance and Assets reported that, on 2nd September 2017, the Department of Communities and Local Government (DCLG) had invited pilot bids for 100% localisation of Business Rates in 2018/19.

The current local government funding methodology included 50% localisation of Business Rates, with 40% being allocated to District Councils and 10% to the County Council in two-tier areas. In practice, however, a system of tariffs meant that the Council actually retained less than this.

With 100% localisation, potentially all rates collected could be retained, but pilot authorities would need to take on additional responsibilities or lose other grant funding to offset the additional income. Should the value of additional responsibilities be less than the additional funding, a tariff would be applied to ensure the starting point would be fiscally neutral for the Government. However, levies would no longer be applied to growth, thus all growth in business rates would be retained and split between the County and District/Borough councils).

Councils wishing to be considered for pilot status in 2018-2019 had to submit their bid to DCLG by 27th October 2017. It was likely that there would be a competitive process and not all bids would be successful. The outcome of the bidding process would be announced in December 2017, probably at the same time as the annual settlement. The finance officers for all councils in West Sussex were currently modelling different scenarios in order to produce a County-wide bid to meet the 27th October 2017 deadline. If the initial modelling indicated that being a pilot would not be financially advantageous, or that it would be significantly risky, a bid would not be submitted.

Although, due to the timescales, it had not been possible to consult with the Finance and Assets Policy Development Advisory Group in the normal way, all members of the Group had been invited to comment on a draft of the report to Cabinet.

RESOLVED

That the Director of Corporate Services, in consultation with the Cabinet Member for Finance and Assets, be authorised to determine whether to submit a bid to the DCLG for the Council to take part in the 2018/19 pilot for 100% Business Rate retention.

REASON

If taxation receipts grow faster than spending on additional responsibilities, a successful bid should result in a greater share of local taxation being retained in the area, for the benefit of residents and service users.

EX/47 **A27 ARUNDEL BYPASS - CONSULTATION RESPONSE**

The Leader reported that, in August 2017, Highways England had published a consultation paper outlining three potential options for a new road bypass on the A27 around Arundel. Although the new road layout would not be located in Horsham District, the new road infrastructure would have an impact on traffic flows on roads and the local environment in the District. A consultation response from Horsham District Council had therefore been prepared indicating that, on balance the Council favoured option 5A as this would result in the greatest reduction in traffic flows and enhancements to air quality in the District.

Details of the proposed response had been circulated to all Members and Parish and Neighbourhood Councils.

Cabinet Members suggested that the proposed response should be strengthened by the inclusion of references to the benefits that Option 5a would have in reducing traffic and 'rat running' in the Pulborough/A283 and Cowfold/A272 areas of the District, in addition to the areas already identified. The Leader indicated that he would amend the consultation response accordingly.

RESOLVED

That the consultation response, amended as discussed to include references to the Pulborough/A283 and Cowfold/A272 areas, be approved for submission to Highways England by the deadline of 16th October 2017.

REASON

To take account of the issues raised in the Highways England consultation and to enable the Council to be fully transparent in its response to the proposed options.

EX/48 **OVERVIEW & SCRUTINY COMMITTEE**

There were no matters currently outstanding for consideration.

EX/49 **FORWARD PLAN**

The Forward Plan was noted.

EX/50 **TO CONSIDER MATTERS OF SPECIAL URGENCY**

There were no matters of special urgency to be considered.

The meeting closed at 5.58 pm having commenced at 5.30 pm

CHAIRMAN

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Report to Cabinet

23 November 2017

By the Cabinet Member for Finance and Assets

DECISION REQUIRED



**Horsham
District
Council**

Not Exempt

Medium Term Financial Strategy 2018/19 to 2021/22

Executive Summary

The review of the Financial Strategy, as part of the budget setting process, enables a balanced budget target to be established with a focus on an affordable level of Council Tax, delivery of the corporate priorities and policies of the Council and the continued enhancement of value for money and satisfaction with services for the residents of the District.

The 2017/18 Budget was approved in February 2017 and a balanced budget was projected for 2017/18 through to 2019/20, with a projected deficit in 2020/21. Since then, the Council has been working further on income generation, continuing the business transformation journey to the next stage and other efficiency measures to mitigate against the cost pressures that continue to rise. This report sets out the proposed Strategy for the period 2018/19 to 2021/22 to establish the context for the Council's Budget and medium term financial planning scenarios and assumptions.

Recommendations

The Cabinet is asked to recommend to Council:

- i) the approval of the Medium Term Financial Strategy 2018/19 to 2021/22, and:
- ii) the approval to use New Homes Bonus to finance more infrastructure and investment property already in the capital programme as detailed in paragraph 3.29, and to:
- iii) note the projected balanced budgets and budget gap as detailed in paragraph 3.6 of the report

Background papers

Report to Cabinet

Wards affected: all

Contact: Jane Eaton, Director of Corporate Resources, 01403 215300
Dominic Bradley, Head of Finance, 01403 215302

Background Information

1 Introduction and background

- 1.1 The Medium Term Financial Strategy was last fully reviewed by Council on 15 February 2017 as part of the annual budget setting cycle. At that meeting a balanced budget for 2017/18 was approved. Cabinet and Members have been kept informed via quarterly budget monitoring and presentations since then to keep them informed of progress with the development of the new strategy.
- 1.2 The local government finance system is becoming increasingly complex. The difficulty of predicting what factors such as interest rates, grant funding and energy costs will be in two to five years' time is further complicated by uncertainty regarding the financial impact of the government's welfare reform programme and future income from retained Business Rates. It is however certain that the amount of money available to district councils will continue to reduce over the next five years.
- 1.3 Each year as the budget is set, unavoidable growth becomes apparent in the services. This is because of increased responsibilities from legislation, contractual obligations and inflationary pressures. However, balanced budgets in 2018/19 to 2019/20 remain predicted through a combination of a range of measures including income generation, continuing the business transformation journey to meet the demands and expectations of our customers, and other efficiency measures.
- 1.4 This review ensures that the 2018/19 Budget and resultant Council Tax level will be set within the context of the Council's Corporate Plan priorities and the financial strategy in order to deliver a balanced budget, updated for the latest information and knowledge available to the Council.

2 Relevant Council policy

- 2.1 To deliver a balanced budget over the medium term.

3 Details

Strategic political, economic and regulatory outlook

- 3.1 The offer of a four-year settlement through to 2019/20, which was made by Government in 2016 was accepted and remains in place. This provides a relative degree of certainty in that the Revenue Support Grant and the baseline Business Rates funding level will not get any worse during this period although it does result in a £0.8m reduction in our government funding over the period. However this is subject to any change to legislation for 100% Business Rates localisation, which is being piloted across the country but has yet to be formally legislated.
- 3.2 The Local Government Association (LGA) has calculated that the total Core Spending Power of all Local Authorities (defined as baseline funding from government in paragraph 3.1 and income from Council Tax and Business Rates retention) will reduce by £6.75bn over the review period (2015/16-2019/20). The Council's detailed financial settlement for 2018/19 which we expect to broadly confirm the four-year settlement will probably be communicated to us immediately prior to Christmas.

- 3.3 UK economists are divided over whether the UK economic outlook has been affected by the apprehensiveness and uncertainty surrounding the negotiations from Britain's exit from the European Union which may happen in March 2019. In the meantime, EU legislation remains in force.
- 3.4 Whilst the long term future impact remains uncertain it should be noted that interest rate forecasts have been updated based upon outcomes to date, the Bank of England base rate continues to be historically low, a £445m quantitative easing programme and some reduction in the credit rating of UK banks by investment firms. Whilst the Bank of England raised interest rates to 0.5% in November 2017, they remain at historically low levels with significant increases not predicted within the period of this MTFS. The value of the pound decreased significantly following the June 2016 referendum; and remains around 13% lower against the U.S. Dollar and the Euro. Conversely, the FTSE 100 share index has risen by around 23% since the referendum to around 7,500.
- 3.5 Inflation has started to increase in recent months putting pressure on expenditure. In October 2017 it measured 4.0% under the Retail Price Index (RPI) and 3% under the Consumer Price Index (CPI). The impact from the cost of fuel is also slowly rising. Both the demand for the Council's services and its income streams are affected by the general economic health of the District, and the prevailing interest rate has a direct impact on interest receipts. Figures from the first half of 2017/18 show planning and Horsham town centre parking below budget. These could be early signs of a downturn in the local economy. Therefore the uncertainty of the economic and regulatory outlook adds risk to the setting of a precise financial strategy. With this in mind, the assumptions within the MTFS have been revisited in the sections below.

Budget assumptions assuming income and efficiency actions being worked on are implemented

- 3.6 Future budget projections are based on a number of assumptions. Table 1 sets out the budget assumptions at November 2017 and Table 2 the forecast revenue budgets in 2017/18 through to 2021/22. Details of the budget assumptions and the reasons for the change in assumptions are explained in the following paragraphs.

Table 1: Budget assumptions

Budget Assumptions	November 2017			
	2018/19	2019/20	2020/21	2021/22
Pay award annual average 1.5%	£260k	£260k	£260k	£260k
Inflationary pressures approx. 3%	£350k	£350k	£350k	£350k
Pensions revaluation approx. 1%	£0	£0	£125k	£125k
Minimum level of reserves	£6m	£6m	£6m	£6m
Increase in borrowing costs	£125k	£125k	£125k	£125k
Reduction in RSG	£280k	£700k	*£0	*£0
Increase in dwellings	1,200	1,100	1,100	1,100
Increase in Council Tax	£5	-	-	-

* From 2020, 100% localisation of Business Rates growth is expected to end other forms of grant funding, such as RSG, but also result in a significant re-baselining of NDR income at a much lower level as well.

Table 2: Revenue budget assuming income and efficiency actions being worked on are implemented

	2017/18	2018/19	2019/20	2020/21	2021/22
November 2017	£000	£000	£000	£000	£000
Net expenditure	11,860	10,900	10,450	11,550	12,500
Funded by: New Homes Bonus	700	250	0	0	0
Council Tax	8,660	9,140	9,300	9,450	9,650
Government grant - RSG	280	0	(700)	0	0
Government grant - Business Rates	1,920	1,980	2,050	400	400
Additional Business Rates retained	200	200	0	0	100
Collection Fund surplus / (deficit)	180	-	-	-	-
Payment to parishes	(10)	0	0	0	0
Total funding	11,930	11,570	10,650	9,850	10,150
Net deficit	(70)	(670)	(200)	1,700	2,350
In year forecast surplus at M6	(250)				

Inflation cost pressures and interest rates

- 3.7 Local Government pay is negotiated nationally and the Council has no direct influence on the settlement. The local government pay award of 1% in May 2016 covered 2017/18 as well. Central government has indicated that they are aware that the potential prospect of inflationary pressures may drive further salary demands within the public sector. Increases above the 1% pay cap were announced in September 2017 for prison officers and the Police. As yet, this has not resulted in any intention being signalled for the local government sector but Parliament is debating public sector pay in early December. It is though anticipated to be revealed in the Autumn Budget on 22 November 2017. An average 1.5% pay increase each year through to 2021/22 has been budgeted in the MTFs above. In expenditure terms this equates to approximately £260k of additional expenditure per annum. Any changes will be reflected in the 2018/19 Budget in February 2018.
- 3.8 Economic forecasters are also predicting a diverse range on inflation over the next three years, reflecting the uncertainty of exit from the European Union. The MTFs currently budgets for a 3% increase in inflation on the expectation that inflation will remain at or near current levels. The Bank of England suggested in its November 2017 inflationary forecast CPI would peak in 2017 at 3.25% and fall back towards its own target of 2% reaching 2.5% by 2019. Whilst income is also affected by inflation, inflation also increases our expenditure that offsets the increases in Council Tax and charges. The impact of inflation on the MTFs will be revisited on a regular basis as the monthly statistics are released by the Office of National Statistics.
- 3.9 An increase in pension contributions is not currently anticipated in 2018/19 or 2019/20 on the basis of the 2016 triennial revaluation of the Council's Pension Fund. This will be revisited annually in the interim periods until information about the 2019 full triennial revaluation of the Council's Pension Fund funding statement is finalised by the actuary. But a future increase in funding remains probable.
- 3.10 The Bank of England base rate increased to 0.5% in November 2017 but remains at historically low levels, affecting the Council's income streams from investments. The Council has taken action over the past eighteen months to diversify the investment strategy into non- high street bank style deposit holdings which should help to

mitigate the effect by generating more income, but nevertheless, this will impact on the Council's ability to generate income from investments during the period.

- 3.11 The amount of money the Council has on deposit generating interest income is also likely to decrease as the proposed strategy to spend commuted sums on affordable housing will lower the amount of funds held by the Council. Significant capital expenditure is also rapidly reducing other funds held by the Council to the extent that the Council started to short term borrow in 2017/18, which will transition to long term borrowing by the end of the MTFs. The positive side of the low Bank of England base rate is that the cost of borrowing is also relatively low.
- 3.12 Economic forecasters are again divided on when an upturn in interest rates may occur. At the moment, the MTFs includes only a small increase over the three year period which is in line with our treasury management advisors' opinion.

Council Tax

- 3.13 The government's 2015 Settlement funding assumptions include all district councils increasing their Council Tax by the larger of 2% or £5 each year over the 4 year settlement period. The Council increased Council Tax by 2.5% (RPI at December 2016) in 2017/18 which equated to an increase of £3.43. It remains the lowest Council Tax in West Sussex and in the bottom quartile of all district councils. RPI is currently 4.0% at October 2017. An inflationary increase in Council Tax, capped at £5 is included in the 2018/19 budget projections, but no further increases have yet been built into the MTFs projections through to 2021/22. Every 1% increase in Council tax increases income by approximately £95k.

Localisation of Business Rates

- 3.14 The Council currently retains around 5% or £2m of the £44m Business Rates collected in the district, which is based on a complex calculation involving target rates of collection set by government. Local authorities can increase their business rate income by growing the business rate take in their area; conversely, if collections fall then local authorities bear an element of risk. Local authorities currently share this risk and reward with central government 50:50.
- 3.15 Historical data suggests a fairly 'flat' picture with limited material Business Rates growth envisaged over the period of the MTFs. This area is a 'momentum indicator' where growth is more likely to continue where it is already taking place. At the moment, on average, every successful new business opening is more or less offset by a conversion of a business premise to residential flats (under the permitted development regime introduced by the Government) or a closure. In 2016/17, after much fluctuation, the 2010 Rateable Value rose by £300k over the year. In the first seven months of 2017/18, the 2017 rateable value list has declined by £357k. Redevelopments in Piries Place and Swan Walk shopping centre are also likely to result in a significant reduction in RV before they improve. In the longer term, initiatives such as the development of North Horsham and the redevelopment of the former Novartis site may offer some upside but at the moment our economic growth as an area is way below the desirable level for affluence of its population.
- 3.16 In comparison with other authorities the Council is comparatively less at risk as it has relatively few single significant sites in respect of business rate valuations. For example, it is not the site of a power station, airport, major retail park or regional

distribution centre. Some risk does exist however, principally around outstanding rates appeals for which the Council would have to bear its share of lost revenue should those appeals prove successful. The Council had a provision of £2.13m for business rate appeals at 31 March 2017. The slow rate at which the Valuation Office is tackling the backlog of appeals makes the Council sceptical that the provision for appeals will fall, especially as a very high level of appeals against the 2017 revaluation listing is expected.

- 3.17 Whilst the 2017 Valuation Office revaluation listing has increased the rateable value, the multiplier has fallen to compensate, with a planned neutral net effect across the country. A period of transition with a damping effect to limit some of the increases and decreases to businesses will come into effect from 2017/18. A relatively small increase in cost to the Council is expected as a result of these changes over the period of the MTFS.
- 3.18 In 2013, Government announced its intention of allowing local government to retain 100 percent of growth of locally collected rates by 2019/20. How this will happen and what impact it will have on local government remains uncertain. No formal legislation has been put forward by Government. The Council is part of the 2018/19 100% Business Rates pilot bid with all the local government authorities in West Sussex but as this is a pilot and is only for one year, it is unclear how this will affect the finances over the medium term.
- 3.19 100% Business Rates localisation does not mean that the Council will get to keep the £44m that it currently collects from Business Rates. Business rate income will continue to be distributed around the country as before. The 100% localisation refers to the level of growth (or fall) from the baseline that is likely to be reset. The Council will also share this growth (or fall) with West Sussex County Council, although the current share of 20:80 may change.
- 3.20 In addition, based on the criteria for the pilot, the Council expects that any 100% localisation of Business Rates will involve the replacement of other funding streams such as RSG which by 2019/20 is a negative £700k, and is also likely to come with additional responsibilities that would give rise to additional costs. It is possible that New Homes Bonus could be made part of this too.
- 3.21 Furthermore, the March 2016 Budget announced that the increase in the Business Rates multiplier will be switched from RPI to CPI from 2020. The multiplier is the annual increase in Business Rates determined by the government. CPI tends to go up more slowly than RPI so this change is likely to reduce the buoyancy in the Business Rates yield. Over time this will have a significant impact on the resources that are available to local government as a sector. Some analysts close to government are predicting that this change may happen before 2020, to reduce the pressure on businesses sooner.
- 3.22 At this point therefore, it is difficult to calculate the effect of all these potential changes as not enough details are known but can conclude that there is a high degree of uncertainty, especially beyond 2020. The Council has made the assumption that a significant re-baselining and including the £700k negative RSG would result in Business Rate income of about £400k rather than the current £2m. The Council will revisit the impact of this as it learns more of how the scheme will work and will feed this into a future MTFS.

New Homes Bonus (NHB)

- 3.23 The New Homes Bonus provides an incentive payment for local authorities to stimulate housing growth in their area. The calculation is based on Council Tax statistics submitted each October. In two-tier local government areas this payment is currently split in the ratio 20% to county councils, 80% to district councils. NHB is currently not ring-fenced and can be spent at the Council's discretion.
- 3.24 Originally a scheme based on payments for six years, in 2017/18, the incentive was sharpened and the 'bonus' was payable for only the following five financial years based on each (net) additional property using a standardised Council Tax Band D amount (£1,455). A 0.4% baseline was also introduced in 2017/18 which needs to be exceeded before any NHB payments are made. For this Council, this means that approximately 240 band D equivalent dwellings need to be built before any grant is received.
- 3.25 From 2018/19, the mechanism under which NHB funding levels are determined will reduce to a four year payment. Government has also hinted that the baseline may be also reviewed. Therefore the future amounts the Council will receive in future will be limited as the sixth and fifth years are lost and will fall if the baseline is increased. Appendix A also models a 0.7% baseline scenario which is more akin to the national average increases in growth in the council tax-base.
- 3.26 Advisors have also tentatively expressed the view that the sharpening might include only payments over each council's Housing delivery requirement in the medium term. For the Council, this would be approximately 800 homes in the year and equates to about 1.2% as a baseline. Appendix A models this third scenario from 2019/20.
- 3.27 The future of New Homes Bonus itself is also uncertain as it is potentially a counterweight in any 100% localisation of Business Rates scheme that may happen in 2020. Government is yet to confirm that NHB will continue at all into the 2020s.
- 3.28 In anticipation of this reduction and potential loss in funding, the Council planned to taper its revenue reliance on NHB over the three year period so that by 2019/20 it does not include any NHB in revenue funding. This contrasts to the £1.17m that was included in the 2016/17 revenue budget.
- 3.29 The principle of using the reserve to strengthen the Council's ability to generate income from appropriate investments in order to receive income to support future service delivery and secure the delivery of infrastructure to serve the needs of the district's resident was considered in the budget papers in February 2017. A recommendation has been included in this report to fully finance the Broadbridge Health leisure centre and then to start to finance the planned annual £3m investment in property. Appendix A models this approach in all scenarios.
- 3.30 The allocation of some of the NHB to finance elements of the expected existing capital programme reduces the impact on the Minimum Revenue Provision which in simple terms is akin to an annual repayment to pay back the funds borrowed for the capital asset.
- 3.31 The NHB reserve stood at £4.9m at 31 March 2017. Depending on the severity of the sharpening of the scheme, the reserve is forecast to be between £3.6m and

£6.4m by 31 March 2020, after allowing for additional allocations to fully fund the new Broadbridge Heath leisure centre and then the planned annual £3m investment in property. This is subject to continued house building continuing at the same rate.

Capital programme

- 3.32 The July 2017 supplementary capital budget for the £15m acquisition the Forum as a commercial investment property and operational car park took the 2017/18 capital programme to £46m which includes the Broadbridge Heath Leisure centre, completion of the Hop Oast depot redevelopment and new waste collection vehicles. At month 6, capital budget holders are slightly optimistically anticipating that £32m (70%) will be spent by 31 March 2018. This compares to the 2016/17 outturn of £9.2m or 52% of the £17.9m capital budget.
- 3.33 Of the currently identified £14m slippage in 2017/18, £4m relates to the delay in the commencement of the Broadbridge Heath leisure centre, £4m on other commercial investment property, and £3.8m on temporary and affordable housing; relating to both housing enabling grants and two temporary housing developments that the Council is planning to deliver in house.
- 3.34 The provisional 2018/19 capital programme includes around 15 new capital programme bids for 2018/19 that have been put forward for consideration and the business cases are currently being reviewed. Around £0.6m of the £1.8m of new schemes has identified funding sources, with the remaining £1.2m currently unfunded. The schemes include improvements to parks and countryside, parking, property and the Capitol. The two-stage challenge process will refine this list before the capital programme is finalised in January 2018.
- 3.35 When the unspent 2017/18 programme is re-profiled and added to the new year programme, approximately £26m is expected in the programme in 2018/19. The programme includes £7.25m on Piries Place car park and £3m on investment property. The impact of an enlarged capital programme is that the Council's minimum revenue provision (MRP is a prudent mechanism to pay back the capital) increases significantly, as do the interest payments on the borrowing. Using NHB to finance BBH leisure centre and then future investment property expenditure reduces the pressure of MRP expenditure from around £0.9m per annum to around £0.75m per annum which is forecast each year from 2018/19 across the MTFS. Without this application, the cost of MRP would rise considerably. The 2019/20 capital programme is already indicatively forecast to be around £8.5m before any new schemes are considered.
- 3.36 The purchase of the Forum has had a positive revenue effect from commercial rental income and a removal of the lease cost for the car park. Together these have combined to substantially improve the forecast surplus for 2018/19 and 2019/20 and help to reduce the forecast deficits in 2020/21 and 2021/22.

Reserves and reserve strategy

- 3.37 The Council holds two types of reserves, earmarked reserves and general revenue reserves. Earmarked reserves are funds received for a specific purpose. For example, grant funding that can only be expended on particular purposes. Details of the earmarked reserves held by the Council at 31st March 2017 are shown in table 3 below.

Table 3: Earmarked reserves

Earmarked Reserves at 31 March 2017	£'000
Neighbourhood Planning Grant	278
S106 reserves	1,184
NNDR reserve	1,435
Council Tax localisation	293
Health and Wellbeing	177
Transformation fund	113
BBH leisure centre (NHB)	1,383
Other	718
Total	5,581

- 3.38 General reserves are reserves held to ensure that the Council has sufficient funds to deal with any emergency or uncertainty. The Council also uses its general fund reserves to fund capital expenditure and redundancy payments. General reserves at 31st March 2017 were £9.5m. Of this, £0.5m of the 2016/17 revenue budget surplus has subsequently been added into the earmarked transformation reserve to fund one-off up-front costs of business transformation in 2017/18.
- 3.39 The Council agreed in October 2012 on a minimum level of general reserves of £6m. From 2020 onwards income from central government is uncertain due to the consultation around business rate localisation. The Council's current strategy on reserves gives sufficient flexibility and headroom to deal with any issues that arise. Implementing Future Horsham efficiencies and planned income schemes, together with the potential actions set out later below, would result in balanced and surplus budgets through to 31 March 2020. Apart from funding this transformation, the Council would not need to dip into reserves. However, applying reserves in excess of the minimum level to finance the capital programme would help reduce the MRP charge. Therefore the general fund balance is anticipated to be around the £6m to £6.5m mark at the end of 2019/20.
- 3.40 The intention is to further review the strategy in the light of any new information on Business Rates localisation and political and regulatory announcements in the Autumn Budget as and when these become available to ensure that the budgets will be balanced on an ongoing basis into the 2020s as well.

Future Horsham

- 3.41 Under the banner of "Future Horsham", the Council has already started to implement some of the ideas to ensure that it can continue its business transformation journey to meet the demands and expectations of its customers in the face of financial and demographic pressures. Future Horsham will deliver a stronger Council which will be more productive and better equipped to serve customers. It will also help to protect front-line services whilst ensuring that the Council has a strong and responsive support services.
- 3.42 The key elements of the changes that are happening are:
- **Shared Services and back office functions:** Whilst the investigation into shared services with Chichester and Arun District Councils was ultimately not successful for Legal, HR and Internal Audit, the findings from this work have helped identify savings that will now be made locally. In addition, following with a review in ICT and a new Financial Management System in Finance, around £0.5m is anticipated to be

saved per annum from these back office functions from 2018/19. From April 2018, the Internal Audit service will be provided by Orbis, which is a wider Surrey and Sussex led partnership. In addition the Council is also looking at other areas of shared service, including for example expansion of the Building Control partnership to include Arun District Council.

- **Change of technology:** The Council has identified a new ICT strategy which will help to define how it invests in technology to support the Future Horsham programme. For example, this will enhance mobile working and there will be a greater ability for customers to self-serve online.
- **Self-service:** The future model for internal support services (e.g. Finance and HR) will mean that managers are trained, equipped and empowered to deal with routine matters directly so that costs are reduced in the back office.
- **Service efficiency:** A systematic approach to redesigning business processes will be implemented to ensure they are as streamlined as possible and that the technology the Council employs works to maximum benefit.
- **Contract reviews:** The Council will re-negotiate existing contracts with service suppliers to reduce costs. It has already done so to a substantial scale on the Leisure Centre Management contract.
- **New businesses:** The Council aims to become more commercial. It needs to generate more income and have more ideas such as the bulky bag collection service. An incubation hub has been set up to encourage this.
- **Benefits review:** The Council gave formal notice to leave the current Census Revenues and Benefits partnership arrangement in March 2017. From April 2018 the service will be provided by LGSS It is anticipated that this service has the potential to save money from an improvement in quality that reduces the penalty of lost subsidy from a Local Authority error rate that is over the government's tolerable threshold.

3.43 In total, Future Horsham business transformational efficiencies are expected to heavily contribute to the £1.5m efficiencies total by 2019/20. In addition, over the same period, the Council has also identified around £2m of new income sources from the Future Horsham project, including that from the larger property investment portfolio and additional income expected from a growth in the number of users.

3.44 The Council is also undertaking a productivity review of all front-line services over the next 18 months. The results of this will be incorporated into the MTFS should any savings or income be identified. This should help to mitigate some of the unavoidable cost increases each year.

Potential actions

3.45 Having implemented the rural car-parking strategy, agreed changes to the waste collection next year, increased garden waste charges and significantly increased the property investment portfolio in 2017/18, much of the big decision making has already been incorporated into the MTFS. Whilst there is now a healthier predicted surplus in 2018/19 and 2019/20 due to actions already taken in 2017/18, continuing action is needed to fund further transformation and help to prepare for the deficits that are currently predicted in the 2020s.

- 3.46 When the budget report is presented to Cabinet at the end of January 2018, it will include the anticipated savings from the business transformation programme, other service efficiencies and income.
- 3.47 The Council has some potential actions it could take now to further mitigate the deficit in 2021/22. It could choose to increase Council Tax, and other fees and charges. Potential options are in table 4 below. It could also consider reviewing the delivery of some discretionary services and further rationalising its property estates.

Table 4: Potential options

Potential Options	2018/19 £000s	2019/20 £000s	2020/21 £000s	2021/22 £000s	cumulative effect by 2021/22
Increase in C-Tax using inflation limited to £5 in 2019/20 and 2% limit thereafter.	Included in budget assumptions at £5	300	200	200	£700k
Increase in garden waste charge by £2	Included in budget assumptions at £2	100	100	100	£300k
Targeted increase of car parking charges across some car parks and season ticket price differentials	Included in budget assumptions at £150k	25	25	25	£75k
Total of potential options	-	425	325	325	£1.075m

- 3.48 This would have the impact of reducing the deficits in the latter years as shown in table 5:

Table 5: Possible budget in the future after actions:

	2017/18	2018/19	2019/20	2020/21	2021/22
November 2017	£000	£000	£000	£000	£000
Net expenditure	11,860	10,900	10,325	11,275	12,125
Funded by: New Homes Bonus	700	250	0	0	0
Council Tax	8,660	9,140	9,600	9,975	10,350
Government grant - RSG	280	0	(700)	0	0
Government grant - Business Rates	1,920	1,980	2,050	400	400
Additional Business Rates retained	200	200	0	0	100
Collection Fund surplus / (deficit)	180	-	-	-	-
Payment to parishes	(10)	0	0	0	0
Total funding	11,930	11,570	10,950	10,375	10,850
Net deficit	(70)	(675)	(625)	900	1,275
In year forecast surplus at M6	(250)				
Future efficiencies at £300k per annum (shown cumulatively)				300	600
Remaining gap to close				600	675

- 3.49 The current Future Horsham programme of efficiencies and income generation has not specifically identified schemes into the 2020s. However, the programme will be extended by looking for new sources of income, reviewing our workforce especially around recruiting and retaining local staff and supporting our people to take on

broader and more complex roles, comparing us to others through our productivity reviews to see if we can provide the same more efficiently, replacing our technology with cheaper, Cloud based options and increasing the amount of self-service using the internet and social media.

- 3.50 This would help to close the budget gap to a more manageable amount in the future. It is also expected that as the Council gets to these years, the budgets would be firmed up with actual efficiencies and income to balance the budget.

4 Next steps

- 4.1 On 25 January 2018, the 2018/19 Budget will be taken to Cabinet to recommend approval at the 21 February 2018 full Council meeting where the Council Tax for 2018/19 will be set. The MTFs will also be updated at this time to take account of the Autumn Budget and our settlement plus the final details of the 2018/19 Budget.

5 Views of the Policy Development Advisory Group and outcome of consultations

- 5.1 The proposed MTFs, assumptions and potential actions were considered by the Finance and Assets Policy Development and Advisory Group at its meeting on 30 October 2017. The Group was supportive of the proposed strategy and also supportive of inflationary increases in Council tax, fees and charges in all years over the MTFs to help deal with the deficits early.
- 5.2 The Chief Executive, Directors and the Head of Finance have been extensively involved in preparing the medium term financial strategy and fully supportive of its contents. The Monitoring Officer has also been consulted during the preparation of the document and is supportive of its contents.

6 Other courses of action considered but rejected

- 6.1 Not taking actions set out in this report would put at risk the ability of the Council to deliver the balanced budgets for 2018/19 and 2019/20 and reduce the budget deficits projected for 2020/21 and 2021/22. Therefore, not taking any action has been rejected.

7 Resource consequences

- 7.1 The Future Horsham changes will lead to a reduction in the size of the workforce over the next three years. In September 2016, Horsham District Council employed 462 staff in total. This constituted 413 full time equivalent (FTE) employees. By comparison at September 2017, the Council employed 427 staff in total, constituting 380 FTEs. The precise figure of future reductions, currently estimated at between 10 and 20 posts, will be firmed up as detailed plans for the individual elements are finalised.
- 7.2 In accordance with the Organisational Change Policy the Council will take steps to avoid compulsory redundancies as far as possible through a combination of vacancy control, redeployment and, in appropriate cases, voluntary redundancy.

8 Legal consequences

- 8.1 There are no legal consequences as a result of this report.

9 Risk assessment

- 9.1 The Council's reliance on central government funding and balancing the medium term financial plan is captured on the corporate risk register at CRR01. This is regularly reviewed and updated and is monitored at Audit Committee on a quarterly basis.

10 Other Considerations

- 10.1 There are no consequences of any action proposed in respect of Crime & Disorder; Human Rights; Equality & Diversity and Sustainability.

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New Homes Bonus (NHB) – November 2017

Appendix A

Dec 2016 settlement for NHB		2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
5 years in 2017/18	2011/12	379	379	379	379	379	379				
4 years from 2018/19	2012/13		390	390	390	390	390				
Using current 0.4% baseline	2013/14			397	397	397	397	397			
	2014/15				776	776	776	776			
	2015/16					994	994	994	994		
	2016/17						1,462	1,462	1,462	1,462	
	2017/18							1,186	1,186	1,186	1,186
	2018/19								<i>1,186</i>	<i>1,186</i>	<i>1,186</i>
	2019/20									<i>1,186</i>	<i>1,186</i>
	2020/21										<i>1,186</i>
		379	769	1,166	1,942	2,936	4,398	4,815	<i>4,828</i>	<i>5,020</i>	<i>4,744</i>
	Used to fund revenue	0	0	1,166	1,166	1,166	1,166	700	250	0	0
	Used for BBH leisure centre	0	0	0	0	0	2,000	5,000	4,500	2,500	
	Used for investment property									2,000	3,000
	Added to / (drawn from) Reserves	379	769	0	776	1,770	1,232	-885	78	520	1,744
	Total Reserve figure	379	1,148	1,148	1,924	3,694	4,926	4,041	4,119	4,639	6,383

Notes:

The 2016 Autumn Statement introduced changes to the mechanism of NHB. The Council received 5 years of payments in 2017/18, which will reduce to 4 years in 2018/19. A 0.4% baseline was also introduced, which needs to be exceeded before any NHB payments are made. For 2018/19, measured against the total band D equivalents in the district, 0.4% equates to approximately 240 additional houses a year before we receive anything. The projected figures in *red italics* are subject to the announcement being made in the December 2017 settlement on the baseline. At this point too, no figures beyond 2020/21 are included on the assumption that payments may not continue into the 2020s. No decision has been made by central government and has not yet been confirmed.

Reliance on NHB to support revenue is being tapered down over the period from 2017/18 to 2018/19. This tapering period will enable us to take measures to increase income and phase in additional spending reductions to balance the budget as new homes bonus cannot be considered a permanent source of income, especially if it is included in 100% localisation of business rates. The table also assumes that NHB reserve is used to fully fund the capital project at Broadbridge Heath (BBH) leisure centre in addition to the £4m allocated in 2016/17 and in 2017/18 as previously approved by Cabinet. And that the £3m of commercial property investment each year starts to be funded from NHB once the BBH leisure centre is paid for, thus financing the purchases and reducing the MRP charge of an unfinanced asset.

The government has retained the option of making adjustments to the baseline in future years. An increase in the baseline of 0.1% is equivalent to approximately 60 band D dwellings, which at the standard payment of around £1,530 per dwelling would reduce NHB by £90k. The second table models NHB with a 0.7% baseline which is more akin to the national average increase.

By 2020/21, an increase in the baseline from 0.4% to 0.7% could impact the Council's NHB by approximately £1.65m over the period.

Dec 2016 settlement for NHB		2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
5 years in 2017/18	2011/12	379	379	379	379	379	379				
4 years from 2018/19	2012/13		390	390	390	390	390				
Using 0.7% baseline	2013/14			397	397	397	397	397			
	2014/15				776	776	776	776			
	2015/16					994	994	994	994		
	2016/17						1,462	1,462	1,462	1,462	
	2017/18							1,186	1,186	1,186	1,186
	2018/19								911	911	911
	2019/20									911	911
	2020/21										911
		379	769	1,166	1,942	2,936	4,398	4,815	4,553	4,470	3,919
	Used to fund revenue	0	0	1,166	1,166	1,166	1,166	700	250	0	0
	Used for BBH leisure centre	0	0	0	0	0	2,000	5,000	4,500	2,500	
	Used for investment property									2,000	3,000
	Added to / (drawn from) Reserves	379	769	0	776	1,770	1,232	-885	-197	-30	919
	Total Reserve figure	379	1,148	1,148	1,924	3,694	4,926	4,041	3,844	3,814	4,733

If the Government sharpened the incentive even further to houses over and above the requirement as set out in the Housing Planning Framework, the Council could have its own baseline of about 1.2%, and a reduction in NHB. This is modelled below from 2019/20 on the assumption of a gradual sharpening. The impact by the end of 2020/21 would be £2.8m compared to the baseline staying as it is at 0.4%.

Dec 2016 settlement for NHB		2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
5 years in 2017/18	2011/12	379	379	379	379	379	379				
4 years from 2018/19	2012/13		390	390	390	390	390				
Using 0.7% baseline in 2018/19	2013/14			397	397	397	397	397			
Using 800 homes as per the Housing Planning Framework as the baseline from 2019/20. Equivalent to about 1.2%	2014/15				776	776	776	776			
	2015/16					994	994	994	994		
	2016/17						1,462	1,462	1,462	1,462	
	2017/18							1,186	1,186	1,186	1,186
	2018/19								911	911	911
	2019/20									530	530
	2020/21										530
		379	769	1,166	1,942	2,936	4,398	4,815	4,553	4,089	3,157
	Used to fund revenue	0	0	1,166	1,166	1,166	1,166	700	250	0	0
	Used for BBH leisure centre	0	0	0	0	0	2,000	5,000	4,500	2,500	
	Used for investment property									2,000	3,000
	Added to / (drawn from) Reserves	379	769	0	776	1,770	1,232	-885	-197	-411	157
	Total Reserve figure	379	1,148	1,148	1,924	3,694	4,926	4,041	3,844	3,433	3,590

In each of these scenarios, this is on the assumption that house building continues at the same rate which may not be the case if the economy slows down.

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Report to Cabinet

23rd November 2017

By the Cabinet Member for Finance & Assets

DECISION REQUIRED



**Horsham
District
Council**

Not Exempt

Approval of Multi-Functional Device (MFD) Tender Process

Executive Summary

The purpose of this report is to seek Cabinet to delegate authority to the Director of Corporate Resources to award a contract for the supply and maintenance of the Council's Multi-Functional Devices (MFD) contract. This need arises because the Council is taking part in joint tender process with Crawley Borough Council and Mid Sussex District Councils and it will delay the award if each Cabinet has to make the decision at the end of the process. The contract will also provide the Council with further opportunity to call off additional Services covered under the Managed Print Services Contract at any time during the term of the contract.

Recommendations

The Cabinet is recommended to delegate to the Director of Corporate Resources, in consultation with the Cabinet Member for Finance & Assets, to award the contract for the provision of multi-functional devices after when the joint tender process is complete.

Reasons for Recommendations

In line with the Constitution Cabinet would normally award any contract with a total value over £250,000. Because we are tendering the contract jointly with Crawley Borough Council and Mid Sussex District Council waiting for each Cabinet to make an individual award would lead to an unacceptable delay in the contract award process. Therefore the report recommends a delegation to the Director of Corporate Resources, after speaking to the Cabinet Member for Finance & Assets to avoid this delay.

Background Papers

There are no background papers

Wards affected: The proposal will affect all Wards.

Contact: Andrea Curson, Head of Technology Services – 01403 215457

Background Information

1 Introduction and Background

- 1.1 The current contract for the supply and maintenance of MFDs expired in 2017. The current contract is with Canon and has been in place since 2014. The fleet is operated under a lease basis with the Council not owning any of the devices.
- 1.2 As Horsham District Council, Crawley Borough Council and Mid Sussex Council were considering procurement within similar timescales it was agreed by the shared procurement service that the 3 Councils work together to re-procure this requirement as a Managed Service Contract to limit the risk of fleet ownership and enhance potential cost reduction opportunities. It was agreed by the Shared Procurement Department and the 3 Councils to undertake a joint Mini-Competition exercise under the London Procurement Partnership NHS Framework Agreement for Multi-Functional Devices which is an EU compliant Framework Agreement which the Councils can access with no fees attached. The current providers of the MFD requirement for the 3 Councils are all on the LPP NHS Framework Agreement and will be able to bid for this joint requirement. The benefits of utilising and accessing this Framework Agreement are:
- Free of Charge Audit carried out by an independent supplier to ascertain the number of devices in the 3 Councils fleet and the current click rate for each device. Other Framework Agreements charged for this service.
 - The Framework Agreement has a good blend of suppliers on it. The mix of suppliers range from MFD manufacturers to MFD service focused providers.
 - Additional scope to draw down on additional services under the framework which include: Hybrid Mail, External Print Room Services, Scanning and Documentation Storage.

2 Relevant Council policy

- 2.1 The project supports the Council Policy for Efficiency in facilitating the delivery of great value public services.

3 Details

- 3.1 The process will look to establish a contract for a sole provider to the 3 authorities. The term of the contract will be an initial 4 years with an extension option of a further 4 years subject to the provision of a new fleet of MFDs being provided to the authorities.
- 3.2 The contract will cover the lease, repair, maintenance and provision of consumables for the Councils entire internal print function, it can also provide paper which will offer the Council an alternative from its current arrangement under our Stationery Contract.

- 3.3 We forecast a saving of 2-3% for the first 4 years of the Contract. This saving will be achieved through the greater buying power by the 3 Councils tendering collaboratively which will enable greater economies of scale.
- 3.4 The 3 authorities should they wish to at any stage during the contract lifetime be able draw down on the contract for additional Print Services which include:
- Hybrid Mail
 - External Print Room Services
 - Scanning
 - Documentation Storage

As these additional Services can form part of the Managed Service, VAT would exempt on those Services.

- 3.5 As the total value of this contract, including the potential extension and extra services, would exceed £250,000 award of this contract is a key decision and would normally be made by Cabinet. However when working in partnership waiting for 3 Cabinets to individually award an operational contract, will delay the introduction of the new service and the savings we hope it will achieve. Therefore this report seeks a delegation of the award to ensure all partners can move swiftly to implementation.

4 Next Steps

- 4.1 The Cabinet is requested to approve delegated authority for the award of this contract following a competitive procurement exercise. This will allow the project to be delivered on schedule and to prevent any potential delays and any cost over-runs associated with delays to the mobilisation and implementation of the new service.

5 Views of the Policy Development Advisory Group and Outcome of Consultations

- 5.1 The Policy Development Advisory Group for Finance & Assets was consulted on 30 October. The Group supported the proposal.
- 5.2 The Council's Monitoring Officer has reviewed and states that there are no implications of this decision.
- 5.3 The section 151 Officer says there are no financial implications of this decision. The let of this contract through a joint procurement should lead to a lower price than Horsham District Council letting separately and savings may be generated to feed into the Council's budgets from 2018/19 onwards.

6 Resource Consequences

- 6.1 There are no staffing consequences as the Council does not employ staff in these services. There may be some financial savings from this let.

7 Legal Consequences

- 7.1 The Framework is underpinned by Terms and Conditions as set out under the LPP NHS Framework, these have been reviewed by legal and approved for use across the three authorities.
- 7.2 Each authority will sign their own contract with the successful bidder which protects each Council should one of the other authorities wish to withdraw from the arrangement over the duration of the Contract.

8 Risk Assessment

The risks and implications for not granting delegated authority to approve the award of the contract following a procurement exercise are:

- Paying higher rates and having reduced contract coverage due to requirement of short-term agreements required to cover the period the Councils are outside of the new contract.
- More resource intense activities to ensure service continuity whilst awaiting migration to new contract.
- Misalignment with the project timetable leading to key milestones within the phasing programme to be missed and causing time and cost overrun.

9 Other Considerations

- 9.1 This report has no effect on Crime & Disorder; Human Rights; Equality & Diversity or Sustainability from this delegation. From the remit of this contract we expect new machines at each refresh to be more energy efficient than their predecessors.

Report to Cabinet

23 November 2017

By the Cabinet Member for Planning and Development

DECISION REQUIRED



**Horsham
District
Council**

Not Exempt

DRAFT GYPSY AND TRAVELLER SITE ALLOCATIONS DOCUMENT PREFERRED STRATEGY

Executive Summary

This report seeks approval for the publication of the 'Gypsy, Traveller and Travelling Showpeople draft Site Allocations Development Plan Document' for an eight week period of consultation, between 1 December 2017 and 26 January 2018 together with the accompanying Sustainability Appraisal documentation. This document does not form Council policy at this stage.

The draft document is an updated version of the 'Draft Gypsy and Traveller Site Allocations of Land Document Development Plan Document - Preferred Strategy' that was published for consultation in April this year. It has been necessary to prepare an updated document in light of the responses received on the earlier consultation and as a result of further technical work. A number of sites included in the April 2017 document are no longer available for Gypsy and Traveller use and a new site is proposed.

Recommendations

Cabinet is recommended that:

- i) The draft 'Gypsy, Traveller and Travelling Showpeople draft Site Allocations Development Plan Document and accompanying Sustainability Appraisal documentation be published for an 8 week period of consultation from 1 December 2017 to 26 January 2017.
- ii) The Cabinet Member for Planning and Development has delegated authority to agree minor editorial changes.

Reasons for Recommendations

- i) The recommendations are required to ensure that the statutory requirements in The Housing Act 2004 and Town and County Planning (Local Planning) England Regulations 2012 are met in terms of seeking to provide for Gypsy and Traveller pitches to meet the identified need and inviting public participation in the preparation of a new planning document for the District.
- ii) There is a need to allow for minor editorial changes. Any significant changes to the draft document would need to be reported back to Cabinet for approval before publication for consultation.

Background Papers

- Draft Gypsy and Traveller Site Allocations of Land Document Development Plan Document - Preferred Strategy, April 2017.
- Summary of representations on the Gypsy, Traveller and Travelling Showpeople Draft Site Allocation of Land Development Plan Document (DPD) April 2017.
- Gypsy, Traveller and Travelling Showpeople draft Site Allocations Development Plan Document, Sustainability Appraisal and Strategic Environmental Assessment 2017.
- Horsham District Planning Framework, November 2015.

Wards affected: All

Contact:

Dr Chris Lyons, Director of Planning, Economic Development & Property ext 5401

Barbara Childs, Head of Strategic Planning and Sustainability ext 5181

Background Information

1 Introduction and Background

- 1.1 This report seeks approval for the publication of the draft Gypsy, Traveller and Travelling Showpeople draft Site Allocations Development Plan Document for an eight week period of consultation, between 1 December 2017 and 26 January 2018 together with the accompanying Sustainability Appraisal documentation. This document does not form Council policy at this stage.
- 1.2 The draft document is an updated version of the Draft Gypsy and Traveller Site Allocations of Land Document (DPD) that was published for consultation in April this year. It has been necessary to prepare an updated document in light of the responses received on the earlier consultation and as a result of further technical work. A number of sites included in the April 2017 document are no longer available for Gypsy and Traveller use and a new site is proposed.

2 Relevant Council policy

- 2.1 The Housing Act 2004 places a duty on local authorities to produce assessments of accommodation need for Gypsies, Travellers and Travelling Showpeople (GTTS), and outlining how their needs will be met.
- 2.2 In November 2015, the Local Plan for Horsham District, known as the Horsham District Planning Framework (HDPF) was adopted. This document now forms the overarching planning document for the Horsham district that lies outside the South Downs National Park. Within the HDPF, Chapter Eight sets out how the housing needs for Gypsies and Travellers will be met. This included the allocation of land for 39 net additional permanent residential pitches for Gypsies and Travellers within the period 2011 – 2017 and a policy setting out the criteria by which any applications for non-allocated sites would be considered.
- 2.3 As the HDPF only provided allocations for Gypsy and Traveller sites until 2017, it was recognised in the Local Plan that further work would need to be undertaken to identify and monitor need and to provide for additional pitches beyond the initial five year planning period. It was envisaged that these sites would be identified in a Site Allocations Development Plan Document.

3 Details

- 3.1 In April 2017, the Council agreed to consult on the draft Gypsy, Traveller and Travelling Showpeople Site Allocation of Land Development Plan Document (DPD). This document set out the need for Gypsy and Traveller accommodation which had been identified in the District, and then set out a number of sites which were considered to have the potential to meet this need, together with a number of alternative sites which had also been considered. This document was published for a six week consultation between 21 April 2017 and 2 June 2017.
- 3.2 Responses were received on the draft documentation from 321 organisations or individuals, including statutory organisations such as WSCC, parish Councils, as well as local residents. The sites that received the highest volume of responses were - 104 representations on Smithers Rough, Rudgwick; 58 on Parson's Field

near Pulborough, and 58 on both the Fryern Park and 53 on the Hurston Lane sites in Storrington. A summary of these comments is attached at Appendix 1 and will be made available on the Council's website.

- 3.3 In response to the comments that were made to the Council's documentation, it was clear that further work would be necessary to demonstrate the delivery of some of the proposed sites in the document. This included establishing whether access could be achieved on land at Smithers Rough and Fryern Park and consideration of landscape impacts on other locations such as Parson's Field near Pulborough. As a result of this further work it has been demonstrated that whilst access can be achieved at the Smithers Rough site, the access and landscape issues at Fryern Park and Parson's Field cannot be resolved at this stage and are therefore no longer being proposed as potential Gypsy and Traveller sites in the draft document.
- 3.4 The response to the consultation also revealed significant access and environmental concerns regarding the proposed Hurston Lane site, which is adjacent to a waste water treatment works. This site cannot be progressed for Gypsy and Traveller accommodation. In a separate development, a certificate of Lawful Use was granted on land at Rowfold Nursery which had been allocated in the HDPF as a Gypsy and Traveller site, and the landowner has confirmed that this site is no longer available for this use.
- 3.5 The loss of these potential sites meant that the Council was no longer able to meet its identified need for Gypsy, Traveller and Travelling Showpeople accommodation. It was therefore necessary to undertake further work in order to identify additional sites. Extensive further site identification work has been undertaken, which has included discussions with landowners and agents and has resulted in one new site where the landowner is prepared to make it available for Gypsy and Traveller use. This site is the former Bromeliad Nursery, Billingshurst and has been assessed as being able to accommodate 15 pitches. It can be demonstrated that the site is available and potentially suitable for Gypsy and Traveller use and is therefore proposed to be included for consultation in the updated Site Allocations document.
- 3.7 In addition to the work that has been undertaken on site availability for Gypsy and Traveller accommodation, the assessment of the need for sites has also been kept under review, for example to take account of the outcome of any planning applications. In April 2017 the existing 'backlog' of sites needed (the number of Gypsy and Traveller sites which are needed to meet the needs today, without considering the future needs of these families) was 47 pitches. This includes pitches which are unauthorised, or are authorised but have a personal or temporary occupancy condition. Since April the backlog has been reduced because one unauthorised site now has full planning permission, and a further two unauthorised sites have been physically removed (at Rowfold Nursery, Billingshurst) and are no longer required. The backlog therefore now stands at 44 pitches.
- 3.8 In April 2017, the future number of pitches required for the next 15 years was assessed as a total of 46:
- 9 pitches in the next five years (2017 to 2022);
 - 19 pitches in years 6 to 10, (2022 to 2027); and a further
 - 18 pitches in the 11 – 15 year period (2027 to 2032).
- Since April, four new pitches have been authorised at Greenfield Farm in Barns Green (DC/16/2721). This therefore reduces the number of pitches required in the

1-5 year period to 5. The updated number of pitches required is set out in the table below. It can be seen that the total pitch requirement for the next 15 years is now reduced to 86 pitches.

Table 1: Total Pitches required over the next 15 year period

Plan Period	Backlog	1-5 years – (2017-2022)	6-10 years – (2022-2027)	11-15 years – (2027- 2032)
Pitches Required	44	5	19	18
Total Pitch Requirement	86			

3.9 National planning policy confirms that LPAs should identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, *where possible*, for years 11 to 15. If the Horsham district was to only plan for the next 10 years to 2027, the total requirement for pitches would be **68** (a reduction from the previous April 2017 consultation document, which was 75 pitches).

3.10 In response to the changes in pitch provision outlined above since April; the comments received to the previous consultation, and further work on the individual sites, the draft Gypsy and Traveller Site Allocations Document has been updated and is structured as set out below. The full text of the draft document is attached to this report at Appendix 2.

- Part A sets the detail on the national and local context for providing accommodation for Gypsy and Traveller site provision. This includes the nationally set definitions of who is considered a Gypsy, Traveller or Travelling Showperson for the purposes of planning to meet the accommodation needs of these community groups.
- Part B sets out the results of the updated Gypsy and Traveller accommodation needs assessment taking account of the outcome of planning applications since April 2017.
- Part C sets out the process by which potential sites for allocation for Gypsy and Traveller pitches have been identified, taking account of the responses to the consultation, and sets out the updated preferred locations for the provision for Gypsy and Traveller accommodation. This section also outlines the alternative sites which have been considered.

3.11 At this stage the sites which are considered to have the greatest prospect of contributing to meeting the needs of Gypsies and Travellers are set out in the table below. The location of these sites is shown on the maps in the draft Site Allocations Document. It can be seen that the total number of pitches identified is 75, which allows for some flexibility over the **68** pitches that are required in the next 10 years.

Site	Notes	Potential number of pitches
Smithers Rough, Guildford Road, Rudgwick	Access can be achieved (in discussions with WSCC) and further work on layout indicates the site could support 15 pitches. Site identified in April 2017 for 10-12 pitches.	15 pitches
Greenacres, Hillside Lane, Small Dole, Upper Beeding	Existing unauthorised site – allocated under policy 21 of the HDPF. Site identified in April 2017 for 12 pitches.	12 pitches
Greenfield Farm, Valewood Lane, Barns Green, West Grinstead	Existing site. Pitches have personal occupancy conditions. It is proposed these are converted to ‘full’ Gypsy and Traveller pitches. One unauthorised pitch on the site has now been granted permission. Site identified in April 2017 for 6 pitches.	5 pitches
Kingfisher Farm, West Chilton Lane, Itchingfield	Existing site with unauthorised pitches. (It is noted this site is subject to an ongoing appeal). Site identified in April 2017 for 11 pitches.	11 pitches
Lane Top, Nutbourne, Pulborough	Three existing pitches have personal occupancy conditions. Allocated under policy 21 of the HDPF. Site identified in April 2017 for 3 pitches.	3 pitches
Northside Farm, Burnthouse Lane, Rusper	Three pitches with personal occupancy conditions. It is proposed these are converted to ‘full’ Gypsy and Traveller pitches. Site identified in April 2017 for 3 pitches.	3 pitches

Oakdene, Blackgate Lane, Codmore Hill, Pulborough	Four pitches under personal occupancy conditions. It is proposed these are converted to 'full' Gypsy and Traveller pitches. In addition it is considered the site could support an additional three new pitches. Site identified in April 2017 for 7 pitches.	7 pitches
Southview, The Haven, Slinfold	Existing site with unauthorised pitches. Allocated under policy 21 of HDPF. Site identified in April 2017 for 4 pitches.	4 pitches
Bromeliad Nursery, Marringdean Road, Billingshurst.	New site with potential for 15 pitches.	15 pitches
TOTAL		75 pitches

4 Next Steps

- 4.1 It is proposed to undertake an eight week consultation on the proposed approach set out in the preferred strategy documentation, in accordance with Regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012. Given that a new site is proposed it is considered necessary to undertake a further Regulation 18 consultation rather than progressing to the Proposed Submission (Regulation 19) stage of plan preparation. It should be noted that at this stage, **these proposals are solely for consultation and do not form Council policy.**
- 4.2 It is proposed that the eight week consultation commences on Friday 1 December 2017 until Friday 26 January 2017. This representation period will provide stakeholders and the general public with the opportunity to set out their views on the document to the Council and what potential changes they would wish to see made to the draft Development Plan document.
- 4.3 The consultation will be run in accordance with the Council's Statement of Community Involvement, which was adopted in February 2017.
- 4.4 Representations that are submitted will be summarised and suggested changes will be considered by a future meeting of the Council. This could include evidence updates or further work on proposed sites or consideration of new land/sites that could be proposed to the Council as part of the consultation.
- 4.5 The comments made on this document will be incorporated into a Proposed Submission version of the Development Plan Document, which will need to be agreed by the Council for a minimum six week consultation under Regulation 19 of the Town And Country (Local Planning) (England) Regulations 2012. After this period for representations, all comments made, will be submitted to the Planning Inspectorate together with the draft plan and any proposed modifications for

independent examination. At this stage it is anticipated that the Proposed Submission consultation will be held in late spring and early summer of 2018, with the Examination of the plan in autumn 2018. It is currently envisaged that the document would be adopted in late 2018 or early 2019, depending on the timescales set by the Planning Inspectorate.

5 Views of the Policy Development Advisory Group and Outcome of Consultations

- 5.1 The proposed content of this document was discussed at the Planning and Development Policy Development Advisory Group on 9 November 2017. Members of the group supported the proposed approach to publish a draft site allocations document for consultation.

6 Other Courses of Action Considered but Rejected

- 6.1 One course of action that could be pursued is to continue to allow the consideration of sites for Gypsy, Travellers and Travelling Showpeople under the criteria set out in policy 23 of the Horsham District Planning Framework. However, this would not provide any certainty to either the Gypsy and Traveller community or the settled community as to the likely location of future sites. In addition, there is potential that other more suitable sites may not come forward using this approach as there would be no detailed assessment of all potential site options.
- 6.2 A second course of action that could be considered would be to seek to ensure that existing allocations in the HDPF together with any other temporary planning permissions or personal occupancy conditions are regularised in the shorter term. The remaining needs arising from the families could then be addressed in the forthcoming local plan review. It is however considered that this option would not adequately address the accommodation needs of all Gypsy, Traveller and Travelling Showpeople in the shorter term, with the allocation of land as part of the Local Plan review increasing the delay in bringing forward sites. This option would also provide some degree of uncertainty to both the travelling and settled community in the shorter term.

7 Resource Consequences

- 7.1 There are no direct financial consequences arising from this report in addition to those which have already been identified, which are the normal staff and publication costs associated with the publication of this document for consultation. In the longer term, the progression of the site allocation document may have a financial and resource benefit to the Council, as an identified supply of Gypsy and Traveller sites will reduce time spent considering applications for 'ad-hoc' Gypsy and Traveller sites, and in time spent at planning appeals which may arise on these cases.

8 Legal Consequences

- 8.1 As set out in paragraph 2.1, The Housing Act 2004 places a duty on local authorities to produce assessments of accommodation need for Gypsies, Travellers and Travelling Showpeople (GTTS), and to outline how their needs will be met. It is considered that the production of this document will assist in meeting this requirement. This document will also meet the Council's stated intention to produce

a Site Allocations document, as set out in the Councils adopted Local Plan (the Horsham District Planning Framework). A Sustainability Appraisal, incorporating a Strategic Environmental Assessment and Equalities Impact Assessment has also been undertaken and will be published with the draft Gypsy, Traveller and Travelling Showpeople draft Site Allocations Development Plan Document.

- 8.2 If agreed for consultation, the consultation will need to be undertaken in accordance with the Town And Country Planning (Local Planning) (England) Regulations 2012, and in particular Regulation 18. In addition a Sustainability Appraisal incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 has been undertaken as part of this work.

9 Risk Assessment

- 9.1 With the preparation of any Development Plan Document, there is a risk that the process could be subject to a Judicial Review on the adoption of the plan. By following the required legal processes as set out in the relevant legislation the risk of a successful challenge is considered to be low.

10 Other Considerations

- 10.1 Unregulated and unauthorised encampments present a potential for community tensions between the travelling and settled communities. Provision of sufficient approved pitches to meet the identified need would reduce such sites.
- 10.2 Under Article 8 of the Human Rights Act, everyone has the right to a home. The provision of land for Gypsy and Traveller accommodation will ensure that this need is met for all sections of the community in Horsham District.
- 10.3 Romany Gypsies and Irish Travellers are recognised in law as a distinct ethnic group and are legally protected from discrimination under the Equalities Act 2010. Local authorities are required to provide accommodation to meet the needs of Gypsies and Travellers. This report addresses the accommodation needs for this group. In addition, the equality impacts of the proposals have been assessed together with the sustainability impacts through the Sustainability Appraisal incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 that has been undertaken as part of this work. This work will ensure that the document mitigates any adverse social, economic or environmental impacts as far as possible.

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THE GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE

**DRAFT SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT
(DPD) – PREFERRED STRATEGY APRIL 2017**

**REGULATION 18 CONSULTATION REPORT – SUMMARY OF
REPRESENTATIONS**

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- 1.0 Introduction
- 2.0 Summary of Comments Recieved
- 3.0 Site Specific Comments
- 4.0 Comments on Alternative Sites

Appendix 1 - Full Statutory Consultee Comments

1.0 INTRODUCTION

Gypsy and Traveller Site Allocations Document April 2017

- 1.1 In April 2017, the draft Gypsy and Traveller and Travelling Showpeople draft Site Allocations Development Plan Document was published for a six week period of consultation between Friday 21 April 2017 and 2 June 2017. This document set out the Council's preferred approach to the provision of sites for Gypsy and Traveller accommodation for the period to 2032. As set out in the consultation document, it was stated that the representations submitted during this period to the Council would be summarised and that suggested changes/deletions to the document would be considered in full by the Council. This document therefore sets out a summary of the responses received and the steps taken by the Council in response.
- 1.2 The Consultation was undertaken in accordance with the Council's Statement of Community Involvement, published in February 2017.

2.0 SUMMARY OF COMMENTS RECIEVED

Volume and nature of comments received

- 2.1 A total of 393 representations were received on the consultation document from 321 individuals or organisations. A further six comments were made anonymously and while these cannot be formally taken into account, the content has been noted and they did not raise any new issues in addition to those set out in this summary document. Of the 393 comments received, 55 were made on the document as a whole, while the rest were submitted in regard to specific sites. Most of these were objections to the proposed sites, however there were also a limited number of representations in support of particular site options. The remainder of the representations were observations about a particular site rather than an objection.
- 2.2 Comments were received from a wide range of organisations including statutory consultees such as West Sussex County Council (WSSCC), the Environment Agency and Southern Water together with non-statutory bodies such as neighbouring authorities and local resident or community organisations. The largest volume of comments was received from local residents.

Summary of General Comments

- 2.3 55 comments were made on the document as a whole of which one was in support of the plan. Three statutory consultees – Surrey County Council, Natural England and the Highways Agency stated that they had no objection to the proposals.

- 2.4 WSCC stated that it would be necessary to ensure that sites in the plan do not conflict with any Minerals Safeguarding Areas (MSA) which have been identified in the WSCC Minerals Plan which is currently at examination. In response to this comment, the Council have cross referenced the proposed sites with the proposed MSAs and only Lane Top Farm falls within any safeguarding area. This is an existing site of three pitches with personal permission which has been identified for full authorisation and no additional pitches. As the site falls below 0.5ha and is fewer than ten dwellings, the site does not exceed the proposed threshold set out in the draft guidance where the impact of such a site would need further consideration.
- 2.5 The Environment Agency highlighted the need for adequate foul drainage to be provided on sites, but recognised that this has been addressed as a general issue in Policy 23 of the HDPF. Where sites are allocated for Gypsy and Traveller use, the issue of foul drainage will be considered in accordance with this policy.
- 2.6 Two Local Authorities (Arun DC and Reigate and Banstead) submitted comments on the plan together with information on the preparation of policies for the provision of land for Gypsies and travellers within their own authority areas. Both authorities expressed a wish to continue discussions as part of the duty to co-operate, and these conversations are ongoing.
- 2.7 Detailed points were raised by Reigate and Banstead BC regarding the methodology used to identify the need for Gypsy and Traveller pitches and they highlighted the need to ensure that the proposed sites are deliverable. Clarification has been provided in the document and this will be kept under review. The Council has undertaken the assessment in as thorough a manner as possible and in accordance with the relevant guidance. Horsham District Council is also of the view that the sites that are set out in the revised document are deliverable.

3.0 SITE SPECIFIC COMMENTS

Draft Site Allocations

Fryern Park Farm

- 3.1 58 representations were submitted in relation to this site. The majority of these were from local residents, but comments were also received from the Parish Council, WSCC and two developers.
- 3.2 A key issue raised in response to this site was how access could be achieved. Representations were received from adjoining landowners stating that the access track was not in the ownership of the landowner promoting this site. WSCC also stated that improvements to visibility would be necessary to bring the access forward in the stated location. Given the need for the provision of upgraded access to the site, one developer representation questioned whether the site would be viable.

- 3.3 Other comments submitted on this site concerned the impact of the development on the rural character and landscape of the area, and the cumulation that this may have with other gypsy and traveller sites in the area. The Parish Council and other respondents stated that the site would not be in accordance with the HDPF as it was not in a BUAB and did not meet the criteria set out in Policy 26 of the plan.
- 3.4 Due to the concerns regarding the potential access to this site at this stage, which have not been resolved, it is considered that the site should not be proposed for Gypsy and Traveller accommodation. It should however be noted that although the site is located away from a built-up area boundary, the key policy consideration for Gypsy and Site Allocations is Policy 23 and not Policy 26.

Hurston Lane Depot, Hurston Lane, Storrington

- 3.5 53 comments were received on this site including three from statutory consultees (WSCC, Southern Water and Storrington & Sullington Parish Council). Two local community organisations also responded.
- 3.6 A key concern raised in response to this site was the amenity of any residents due to the proximity of the sewage works to the site. This was considered to have adverse impacts on any residents, who would be affected by noise and odour from the water treatment works. Some respondents highlighted that residents of caravans would be more susceptible to these impacts than residents of bricks and mortar accommodation, and that similar consideration should apply to all types of residential use. Southern Water highlighted that this would be contrary to planning policy including paragraph 109 of the NPPF.
- 3.7 Many respondents were concerned that development of this site would have an adverse impact on landscape character given the rural location and open nature of the site although some respondents including Storrington and Sullington Parish Council recognised that the site is brownfield. Despite this, respondents considered that the residential use would have an adverse impact on the character of the area.
- 3.8 The potential for the site to be affected by flooding was raised by a few respondents, however as noted by WSCC the site is outside floodzones 2 and 3 and no risk of surface water flooding has been raised.
- 3.9 The main issue raised in relation to this site was site access. It was highlighted by the majority of respondents that the site has a narrow access which would conflict with other users of the area and be unsuitable for large vehicles. The lack of a pavement was also highlighted as a potential concern. WSCC stated that gaining access to the site would require widening of the access track with a minimum of an additional passing place required. Southern Water in their response indicated that the land used to access the site is in their ownership and that the WWTW operates 24 hours a day, 365 days a year with essential equipment such as pumps and compressors running continually. Furthermore, heavy goods and other vehicles operating on behalf of Southern Water require frequent and unhindered access to the site to enable employees/contractors to undertake routine or emergency maintenance work. The access to the site cannot be resolved and the site description has been updated to reflect this point. This together with the potential environmental

impact on residents has led to this site no longer being proposed as a potential Gypsy and Traveller site allocation.

Smithers Rough

- 3.10 A total of 104 representations were submitted in relation to this site. The vast majority were received by local residents, but comments were also received from the Environment Agency, WSCC and the Parish Council. Two local community groups also submitted further comments.
- 3.11 The main concern raised in response to the proposal of this site was access to the site, and the impact that this may have on road safety due to the road layout in this area. Both the Parish Council and residents stated that traffic in this area is fast moving, and that evidence indicates that volumes of traffic have increased by 20% in recent years which would therefore exacerbate any problems. West Sussex County Council made comments on the highways and access to this site, stating that safe vehicular access to the site is not currently present, although it was noted that the site has been accessed in the past from the east. It was stated that safe access will require significant clearance of trees for visibility splays and alignment of the carriageway. In response to these comments further work has been undertaken in discussion with WSCC to ensure that safe access to the site can be achieved.
- 3.12 The proximity of the site to the floodplain was raised by a number of respondents including the Environment Agency who stated it would be necessary to ensure that the sequential tests for flood risk were followed and that no development takes place on this part of the site. The consultation document has therefore been updated to clarify that this section of the site will not be developed. The Environment Agency and a small number of other respondents noted that the site has been subject to historic landfill and that there was potential for contamination on the site. It is recognised that further investigation is required in relation to this matter, but at this stage it is considered that any necessary mitigation could be achieved.
- 3.13 The wider sustainability of the site was also raised as a concern. Many respondents stated that there was no pedestrian access to the site and that the site is not close to existing services and facilities in the village. The lack of pedestrian access and a nearby bus stop was raised by WSCC as well as local residents. Although it is recognised that the site does not adjoin the BUAB boundary of Rudgwick, it is still relatively close to the settlement and the range of services and facilities that it contains. The site is therefore considered to meet the criteria set out in HDPF Policy 23.
- 3.14 The other comments submitted in relation to this site concerned the impact of this site on the rural character and environment on the area. The proximity of the site to adjoining ancient woodland was raised by some respondents. The designated ancient woodland is however opposite the site to the north of the A281 and is therefore not likely to be directly affected by these proposals. The impact of any development on the rural character is noted, and any allocation of this site would need to ensure that necessary landscaping is provided to mitigate this issue.

Oakdene, Blackgate Lane

- 3.15 Three representations were received on this site, two from members of the public and one from West Sussex County Council (WSSC). The public were concerned that this is a rural lane and as such is unsuitable for traffic. WSSC were concerned with the potential for surface water flooding. This issue has not been raised in previous planning applications. Whilst further investigations are ongoing it is considered that this matter can be resolved.

Greenacres, Hillside, Small Dole

- 3.16 Four representations were received on this site. These included submissions from the Environment Agency and WSSC. WSSC recognised that this is an existing allocated site and that there are already traffic movements site, and did not raise any further issues. It was however indicated that is surface water flooding to the north but not affecting the site. The Environment Agency raised the need for adequate foul drainage to be provided on the site, but recognised that this has been addressed in Policy 23 of the HDPF.
- 3.17 Comments from local residents raised concerns regarding the cumulative impact that this development would have, taking into account the total number of Gypsy and Traveller pitches in the area, and the pressure that this was placing on local services and facilities. This site is however an existing site (and HDPF allocation), and no new pitches are proposed. This proposal will not therefore have any additional impacts on services or facilities.

Greenfield Farm, Valewood Lane, Barns Green

- 3.18 Four representations were received in relation to this site – including one from WSSC and the other from Itchingfield Parish Council. WSSC indicated that there was a low risk of surface water flooding on the site. It was also stated that as the site is already in existence no additional trips would be generated by this proposal.
- 3.19 Itchingfield Parish Council raised concerns that this site would, cumulatively with Kingfisher Farm, have an unacceptable impact on the landscape and visibility area. The cumulative impact of this development was also raised by local residents who stated that it was placing pressure on services and facilities in the Barns Green.
- 3.20 Although the cumulative impact of the site with Kingfisher Farm is noted, the sites set out in the consultation document are already in existence and this proposal will not have any additional impacts on services and facilities.

Kingfisher Farm, Barns Green

- 3.21 Six representations were received in relation to this site. Three responses were from local residents and the others were from WSSC, the Environment Agency and Itchingfield Parish Council.
- 3.22 Itchingfield Parish Council, stated that this site would have an unacceptable impact on landscape, would concentrate the Gypsy and Traveller community in one location, and moreover, the Council should consider a more distributive strategy for Gypsy

and Traveller accommodation. The Parish and community comments also raised the cumulation of impacts with the nearby Gypsy site in Valewood Lane to the south. The cumulative impact of this development was also raised by local residents who stated that it was placing pressure on services and facilities in the Barns Green. Although the cumulative impact of the site with Greenfield Farm is noted, the sites set out in the consultation document are already in existence and this proposal will not have any additional impacts on services and facilities.

- 3.23 WSCC noted that this proposal was seeking to formalise an existing activity meaning existing trips would not increase, albeit most would be by car. Improvements to the visibility out on to West Chiltington Lane were suggested should the site be allocated. This has been reflected in the updated site information.
- 3.24 The Environment Agency raised the need for adequate foul drainage to be provided on the site, but recognised that the need for such provision is set out in policy 23 of the HDPF. This has been reflected in the updated site information.

Lane Top, Pulborough

- 3.25 Three representations were submitted in relation to this site. One comment came from a local resident with the other two from WSCC and the Wiggonholt Residents Association.
- 3.26 The response from the Wiggonholt Residents Association expressed support for this proposal as the removal of personal occupancy conditions would not result in any further material changes to the site.
- 3.27 Some confusion was raised in the responses to this site as to whether the proposal was for three additional pitches or for the existing personal permissions to be fully authorised. This was noted and the report has been updated to clarify that the proposal is for the full authorisation of the existing pitches.
- 3.28 WSCC confirmed that the site has no identified flood risk. It also stated that although the site was not close to sustainable modes of transport that the site is allocated in the HDPF and that impacts from this site have therefore already been considered.

Parson's Field, Pickhurst Lane, Pulborough

- 3.29 A total of 58 representations were made on this site. The vast majority were from local residents, but three representations were made by local community organisations and a further two were from statutory consultees.
- 3.30 WSCC confirmed that there was no surface water flood risk to the site and the Environment Agency raised no risk of fluvial flooding. The Environment Agency stated that adequate foul water drainage would need to be provided, but recognised that this matter is covered by Policy 23 of the HDPF.
- 3.31 The majority of the remaining comments raised road safety and the narrow access to the site as a concern. The junction of Blackgate Lane with the A29 was identified as a location of a number of road accidents. In addition, the potential for vehicles on this lane to conflict with other road users, including walkers and horse riders was

highlighted. Although these concerns are noted, WSCC noted in their response that the site has already been subject to planning applications where the impact on the road network was considered and no severe impacts had been identified as a result. The site description in the revised consultation document has therefore been updated to reflect this point.

- 3.32 The other comments submitted on this site related primarily to impacts on landscape and heritage. It was highlighted that previous appeal decisions on the site had identified negative impacts on the countryside and local heritage, including the setting of a nearby listed building. A number of comments stated that whilst the current permission was temporary, the landscape and heritage impacts which had been identified would then become permanent. Having undertaken further review of the site taking into account the long term nature of any impacts if the site becomes permanent, the site is not being proposed for allocation.

Northside Farm, Burnhouse Lane, Rusper

- 3.33 25 comments were submitted in relation to this site. 22 were from members of the public and three from statutory consultees. Rusper Parish Council stated that the site has never been used as a genuine traveller site but as a residency for a single family and that it is not suitable for additional pitches due to its rural location. This site is not however being proposed for additional pitches and this has been clarified in the site description set out in the updated consultation document.
- 3.34 West Sussex County Council noted that there was surface water flood risk across much of the site and areas of ponding in the north east corner. Given that this would have been a consideration when granting personal occupancy, the removal of the personal occupancy condition is not considered to result in a material change of the use of the site in either flood risk or highway terms.
- 3.35 The Environment Agency stated that adequate foul water drainage would need to be provided, but recognised that this matter is covered by Policy 23 of the HDPF.
- 3.36 The public comments largely centred on the impact on the natural environment and the landscape characteristics of the site; there were also concerns relating to the vehicular access and the remoteness of its location. As set out above, this site is not being proposed for additional pitches and there will be no additional impacts which would arise from the allocation of this site.

Rowfold Nurseries, Coneyhurst Road Billingshurst

- 3.37 Three comments were submitted in relation to this site, from Billingshurst Parish Council, WSCC and the Environment Agency.
- 3.38 WSCC confirmed that there was no flood risk on the site, and the Environment Agency raised no risk of fluvial flooding. The Environment Agency stated that adequate foul water drainage would need to be provided, but recognised that this matter is covered by policy 23 of the HDPF.

- 3.39 The other key issue raised in relation to this site was lack of a pedestrian footway to the site, and the reliance any occupants would therefore have on the private car to reach services and facilities.
- 3.40 These comments are reflected in the site summary, but the site is no longer available for Gypsy and Traveller accommodation following the grant of a Certificate of Lawful Use on the site, and the site is no longer proposed for allocation as Gypsy and Traveller accommodation.

Southview, The Haven, Slinfold

- 3.41 Two comments were received on this site from Slinfold Parish Council and West Sussex County Council. Slinfold PC had no objection to the proposal and WSCC had minor concerns in relation to highway visibility to the north of the site due to a large oak tree, but recognised the existing use of the site.

Southside, Honeybridge Lane, Dial Post

- 3.42 Seven representations were received on the site in total. Five objections were from members of the public, largely in relation to the narrow access to the site and potential safety concerns. Two comments came from statutory consultees. WSCC indicated there was significant surface water flooding to the north and east of the site and that further information would be required as part of the current planning application in terms of access arrangements.
- 3.43 West Grinstead PC expressed concerns in terms of access and the particular needs of Travelling Showpeople in terms of Heavy Goods Vehicles. The outcome of the planning application and the need for Travelling Showpeople accommodation will be kept under review moving forwards.

4.0 COMMENTS ON ALTERNATIVE SITES

Deer Park Farm, Hampers Lane, Horsham

- 4.1 A single representation was submitted on this site from the High Weald AONB in which the site is located. The response requested that certain factual matters be incorporated into the site description. This has been undertaken.

Denver Storage, Oakhurst Lane, Billingshurst

- 4.2 One comment was submitted in relation to this site, which stated that the site was considered to perform better in sustainability terms than the site at Parsons Field, and would be a better site for allocation than the site (Parson's Field) which had been proposed. The Sustainability Appraisal has been updated in response to this consultation and has taken these comments into consideration.

Oaklands, Honeybridge Lane, Dial Post

- 4.3 Four comments were received in relation to this site. Storrington Parish Council noted that the site is outside the BUAB and should not be expanded. Three comments from the public suggested no additional gypsy sites were required in Storrington.

Oldfield Stables, Fryern Road, Storrington

- 4.4 Four public comments were received in relation to this site, with the main concerns being in relation to access and the rural nature of the site.

Sussex Showground, Grinders Lane, Dial Post

- 4.5 Four public comments were received in relation to this site, with the main concerns being in relation to access and the rural nature of the site.

Sussex Topiary, Naldretts Lane, Rudgwick

- 4.6 No site specific comments were made in relation to this site.

APPENDIX 1 – STATUTORY CONSULTEE COMMENTS IN FULL

Organisation	Section of Document	Summary
Storrington & Sullington Parish Council	Fryern Park Farm (Section 7.0)	<p>One of the criteria used to assess the sites is “The development will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties and is sensitively designed to mitigate any impact on its surroundings”.</p> <p>We would contend that the Fryern Park Farm site would have an unacceptable impact. The site is located outside the BUAB, in open countryside and is therefore contrary to Policy 26 of the HDPF as the development does not;</p> <ol style="list-style-type: none"> 1. Support the needs of agriculture or forestry; 2. Enable the extraction of minerals or the disposal of waste; 3. Provide for quiet informal recreational use; or 4. Enable the sustainable development of rural areas. <p>The SA itself points out that access to the site is along a designated Private Right of Way (PROW).</p> <p>This PROW is very well used and this would therefore result in a danger to the many walkers, cyclists, runners and horse-riders who regularly use it. There have been several attempts in the past to get residential permission on this site and we feel that this is simply another route for trying to achieve this. Allowing this would set a dangerous precedent for the remaining surrounding fields. The proposal is therefore unacceptable.</p>

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Storrington & Sullington Parish Council	Hurston Lane Depot (Section 7.0)	<p>The Hurston Lane site has poor access, along a single-track country lane, again used by many walkers and riders. The site is also adjacent to the sewage treatment plant as pointed out. However, it should be possible to take measures to mitigate any nuisance from that site.</p> <p>Although preferred as it is a brownfield site, it too lies outside the built-up area boundary and is therefore in a countryside location.</p> <p>Consequently, the same policy applies as above, Policy 26, with which it does not comply. The site is therefore unacceptable.</p>
Storrington & Sullington Parish Council	Oldfield Stable (Section 8.0) and General	<p>This site was granted permission at appeal for 3 mobile homes and a day room. Again, the site is outside the built-up area boundary and was opposed by the Parish Council. Since it now has permission it will obviously remain but should not be expanded.</p> <p>As a general comment, it is unacceptable that travellers should be granted permission on sites that would not normally obtain permission. The same rules should be applied to all applicants.</p> <p>We would support the suggestion in the report that all existing sites should be regularised and included in the numbers required, thus reducing the need for new sites.</p> <p>Any sites that may be included should have a condition imposed requiring the site to be returned to its original state and use if that site is no longer required in future.</p> <p>Whilst this is not strictly a planning issue, members are concerned that there are no natural boundaries; sites can easily be enlarged, not just for legitimate approved development, but also for adjacent unauthorised non-residential activities.</p>
Surrey County Council	General	Thank you for consulting Surrey county Council on the above document. We do not have any comments.

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Billingshurst Parish Council	Rowfold Nursery Site (Section 7.0) and General	<p>The Parish Council is disappointed to note that there were no sites to be allocated in either Horsham or Southwater.</p> <p>The proposed site on East Street, Billingshurst is an unsustainable site as there is no footway to the village centre and local facilities, thus necessitating a total reliance on the use of motor vehicles.</p> <p>Parish Councillors felt that Horsham District Council should purchase and manage its own sites.</p>
Environment Agency	Smithers Rough Site (Section 7.0)	The southern boundary of the proposed site at Smithers Rough, Guildford Road (A281), Rudgwick lies within Flood Zone 2 and 3 according to our Flood Map for Planning. We would wish to see a sequential approach should be taken on this site to ensure that no development takes place in this part of the site. This site is also located on a historic landfill and consideration should be given to potential ground contamination.
Environment Agency	Greenacres Site (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.
Environment Agency	Greenfield Farm, Valewood Lane, Barns Green (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework

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		requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.
Environment Agency	Kingfisher Farm, West Chiltington Lane (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.
Environment Agency	Northside Farm, Burnthouse Lane (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.
Environment Agency	Parsons Field Stables, Pickhurst Lane, Pulborough (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.

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Environment Agency	Rowfold Nurseries, Coneyhurst Road, Billingshurst (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.
Arun District Council	General Comment	<p>The pitch targets for private Gypsy and Travellers pitches between 2012 and 2017 have been met, with an overall net gain of one private pitch since April 2013. However, a further four pitches are required up to 2027. There has been no gain in public pitch provision since April 2013.</p> <p>Arun District Council Local Plan Sub Committee of 30th June 2016 approved the update of the methodology for use by officers in the assessment of potential sites for Gypsy and Traveller and Travelling Showpeople. This report presents an update of the methodology for assessing potential Gypsy and Traveller and Travelling Show people sites, to meet the need for pitches as identified in the Gypsy and Traveller Accommodation Assessment study (published in 2013 and updated in May 2015). A clear site assessment methodology has been developed in order to appraise the relative suitability of sites and to inform the identification of preferred sites which will then progress into The Gypsy, Traveller and Travelling Showpeople Site Allocation Document (DPD). The DPD will identify land for permanent pitches to meet the need identified to 2027. The need for the sites results from the Coastal West Sussex Gypsy, Traveller and Travelling Showpeople Assessment (GTTA) (phase 1), which identified a need in Arun District for 9 pitches for Gypsy and Travellers and no plots for Travelling Showpeople in the plan period because the need has been met through planning applications.</p>

Organisation	Section of Document	Summary
		<p>Policy H SP5 Traveller and Travelling Showpeople accommodation in the emerging Arun District Council Local Plan outlines the policy approach for the Council to provide for adequate Traveller accommodation at appropriate locations throughout the District and sets out a range of criteria against which sites can be assessed.</p> <p>In order to progress this, we are currently seeking to start work on a new GTAA, which will update the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (April 2013) and the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment: Update Report (December 2014). The document Planning Policy for Traveller Sites (August 2015) indicates that in assembling the evidence base local authorities should work collaboratively with neighbouring local planning authorities. In addition the Duty to Cooperate also requires local planning authorities to work together from the start of the local plan process including plan scoping and evidence gathering. As such we will be undertaking this work in collaboration with our neighbours as per the original study.</p>
Reigate & Banstead Borough Council	General Comment	We fully appreciate the difficulty in identifying the accommodation needs of travellers and we hope the following comments are useful and taken in the spirit they are intended:
Reigate & Banstead Borough Council	Paragraphs 3.7/3.8 and Annex	We could not see information on whether there were a set number of revisits to pitches/plots if occupants were not in /unavailable?
Reigate & Banstead Borough Council	Paragraph 5.2	We would suggest that these discussions are held before the document is finalised, as well as any outstanding traveller interviews as per table A6. If discussions with the existing households cannot be undertaken then perhaps growth rates can be applied to known numbers, depending on what is known about demographics.

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Reigate & Banstead Borough Council	Appendix 1	It is not clear to what extent the needs of gypsies and travellers living in bricks and mortar have been taken into account and to what extent you have tried to engage with people living in bricks and mortar. We note you mention you had interrogated the housing register but there does not appear to be anything over and above this done for bricks and mortar - a thorough assessment of bricks and mortar should form part of the robust evidence base as required by PPTS 2015.
Reigate & Banstead Borough Council	Paragraph A1.35	The figure of 3% as a standard average growth rate has been challenged and recent findings is that 3% may be too high and growth figures should be connected more closely with the age profile of the borough - a letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) confirmed the Government do not endorse or support the 3% growth rate figure. I would direct you to para 7.16 of the RBBC GTAA for further information on this.
Reigate & Banstead Borough Council	Paragraph A1.30/A1.31	The calculation of known need does not acknowledge that there could be in migration, it only seems to assume out migration. Question 11 of the questionnaire also asked for those that are likely to require their own pitch/plot in the next 5 years, it may have been useful to extend this to those likely to require it in years 6 – 15 as well to inform assumptions in Table A7.
Reigate & Banstead Borough Council	General Comment	PPTS 2015 definition: As a general comment on approach, our recently completed Gypsy and Traveller Accommodation Assessment took account of the new definition of a Traveller in PPTS 2015 and as such the report identified where households do not meet the planning definition. Those not considered as travellers (under the new definition) will form part of the assessment under the new requirements in the Housing and Planning Act (2016) which requires local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.

Organisation	Section of Document	Summary
		<p>Migration in/out of study area: cannot see any specific comments on movement to and from sites outside the study area or conversations that have occurred with neighbouring authorities to understand their context.</p> <p>Timing of interviews - cannot see any information on timing on interviews. Questionnaires and interviews should be carried out outside the travelling season.</p> <p>Concealed households / overcrowding / doubling-up: does not appear to be clear acknowledgement of following issues which can impact on numbers:</p> <ul style="list-style-type: none"> • concealed families, where a couple or lone parent with children are living within a primary family or adult children (aged 18 and over) living at home (although acknowledged this is touched on in A1.30) • Doubling up - which may be brought about with the same households being identified on more than one waiting list (although again touched on in A1.13)
Reigate & Banstead Borough Council	General Comment: Site Allocations	Given the high need that exists within the South East we would expect that all councils seek to maximise opportunities to meet their own need by identifying suitable and deliverable traveller sites, and be able to robustly justify any shortfall in provision.
High Weald Area of Outstanding Natural Beauty (AONB) Unit	Deer Park Farm, Hampers Lane, Horsham (Section 8.0)	The description of the site should include the following additional information. Hampers Lane is a historic route way shown on the earliest comprehensive maps (Ordnance Surveyors Draft 1800) and the High Weald AONB Management Plan seeks to maintain the historic pattern and features and ecological function of route ways (Objectives R1 and R2). Any physical alterations to this route way to accommodate additional traffic are likely to have a significant impact on this character component of the AONB. The site itself was part of St

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		Leonards Park and is described in the Historic Landscape Characterisation as 'regular piecemeal enclosure' probably enclosed post 1845.
Highways England	General Comment	Having reviewed the published documentation, we do not have any comments on the Gypsy, Traveller and Travelling Showpeople Draft Site Allocations Development Plan Document (DPD) – Preferred Strategy; however, please continue to consult us.
Rudgwick Parish Council	Smithers Rough, Guildford Road (A281), Rudgwick (Section 7.0)	<p>Rudgwick Parish Council objects to the proposal to include the Smithers Rough site in the Site Allocations Document.</p> <p>In the 2012 review the site was considered to be undeliverable due to Highway concerns. WSCC did not support the proposal due to Highway safety reasons. The road is significantly more dangerous than five years ago, with an increased volume of traffic from developments in Horsham and Broadbridge Heath.</p> <p>There are no pedestrian links serving the site and there will be a total reliance on private motor vehicles and no safe pedestrian access.</p>
West Sussex County Council	General Comment	The Horsham District Planning Framework (HDPF) sets out how the housing needs for Gypsies and Travellers will be met in the plan period. This included the allocation of land for 39 net additional permanent residential pitches for Gypsies and Travellers within the period 2011 - 2017 and a policy setting out criteria by which any applications for non-allocated sites would be considered. As the HDPF only provided allocations for Gypsy and Traveller sites until 2017 the Consultation Draft of the Gypsy, Traveller and Travelling Showpeople Sites Allocations Development Plan Document (DPD), has been prepared to set out how Horsham District Council is proposing to meet the future needs for permanent Gypsy, Traveller and Travelling Showpeople accommodation for the period 2031. It is also intended to satisfy the requirements of the Government's Planning Policy for Traveller Sites.

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		<p>The overall need for Gypsy and Traveller pitches in the Horsham District equates to a total of 93 pitches over the next 15 years. This comprises an existing need of 47 pitches which have been identified as the 'backlog' of existing unauthorised sites, personal or temporary planning permissions. In addition, there is also a future accommodation need of 46 pitches in the next 15 year period.</p> <p>The document identifies 12 sites (with one possible further site), considered to have the greatest prospect of contributing to meeting Gypsy and Traveller site needs. The document also states that, at this stage, no transit site is required within the District.</p> <p>This note sets out West Sussex County Council's officer response to the Gypsy, Traveller and Travelling Showpeople Draft Site Allocations Development Plan Document. It highlights key issues to which Horsham District Council is requested to give consideration.</p>
West Sussex County Council	Fryern Park Farm, Fryern Road, Storrington (Section 7.0)	<p>The site is located outside Flood Zone 2 and 3, no identified surface water flood risk.</p> <p>Access to the site from the public highway (Fryern Road) is narrow. Improvements to width over the initial 10 metres from the public highway to enable two opposing vehicles to pass would be required. The access track is however outside the red edging within the draft allocation. Confirmation would be required that improvements can be achieved by the applicant.</p> <p>Visibility at the existing access is also poor to the south. Improvements to this appear possible within the existing highway. If this site is allocated, this should include a requirement to increase the private access road width from its junction with Fryern Road to enable two opposing vehicles to pass and improve visibility at the Fryern Road junction.</p>

Organisation	Section of Document	Summary
West Sussex County Council	Smithers Rough, Guildford Road (A281), Rudgwick (Section 7.0)	<p>Flood risk (zones 2 and 3) is present at the southern boundary of the site. There is also evidence of some surface water flows towards the western boundary of the site and evidence of ponding. These risks would need to be carefully managed in site design.</p> <p>Although the site has a long frontage onto the A281, given the heavily vegetated nature of the site, the vertical alignment of the carriageway, and the limited extent of highway verge on the southern side of the carriageway, there are obvious constraints to securing vehicular access. In saying this, it is understood that an access has previously been taken into the site from the east. If this site is allocated, further consideration must be given to the ability to secure a safe and suitable vehicle access onto the A281. As noted above, WSCC would in principle raise concerns as to whether a suitable access arrangement can be achieved. The particular concern would be the ability to secure the necessary length visibility splays within land forming part of the public highway and/or under the control of the applicant. To ensure that visibility is retained at all times, there would need to be significant clearing of vegetation along the site frontage. There is also the matter of forward visibility for eastbound vehicles to a vehicle waiting to turn into the site; this would be greatly constrained by the vertical carriageway alignment.</p> <p>Notwithstanding all of the above, serious consideration should be given to access by sustainable modes to services in Rudgwick. There are no footways or public rights of way that could enable access, nor any connections to nearby bus stops. WSCC would not support pedestrians having to walk alongside the A281 to reach Rudgwick. In these respects, it is considered that there is a conflict with paragraph 32 of the NPPF.</p> <p>On highway grounds, WSCC would have significant concerns with this proposed allocation.</p>

Organisation	Section of Document	Summary
West Sussex County Council	Horsham District Council Depot, Hurston Lane, Storrington (Section 7.0)	<p>The site is located only 60 metres away from a designated flood zone (2 and 3) to the southwest of the site.</p> <p>Access to the site from Hurston Lane is narrow although this is straight allowing for good forward visibility between opposing vehicles. There is an informal passing place at a field gate part way along the access road. A further passing place would ideally be provided further west from the existing informal passing place. If this site is allocated, this should include a requirement to provide at least a further passing place along the private access road leading from Hurston Lane.</p>
West Sussex County Council	Greenacres, Hillside Lane, Small Dole, Upper Beeding (Section 7.0)	<p>Surface water flood risk is identified to the north of the site, but nothing affecting the proposed site.</p> <p>It's understood that the pitches are already in place and occupied and have been generating activity for some time. In light of this, no issues would be raised with the continued use of the A2031/Hillside Lane junction. It's noted that this site is allocated in the adopted Horsham District Planning Framework for 12 traveller pitches; matters relating to the acceptability of the site would have been reviewed and accepted.</p> <p>There would still be benefit for improvements to visibility onto the A2031 from Hillside Lane to the north. It is considered that this could be achieved but cutting back vegetation. The accessibility of the site to existing services is poor with there being no footways alongside the A2031.</p>
West Sussex County Council	Greenfield Farm, Valewood Lane, Barns Green (Section 7.0)	<p>Low risk of surface water flooding identified (0.1% Annual Exceedance Probability affecting western part of site), land is on a relatively high elevation with gradient falling away to the west/south.</p>

Organisation	Section of Document	Summary
		<p>The site already has a number of existing pitches with access from Valewood Lane and West Chiltington Lane. It is understood that the proposal seeks only to remove personal occupancy conditions and permit a single existing unauthorised pitch. No additional pitches are proposed. In highway terms, the proposed changes are not anticipated to result in any significant intensification of use of the site or accesses, which has previously been considered and accepted the most recent by way of DC/13/2457.</p> <p>For this and Kingfisher Farm sites, although these are close to Barns Green, accessibility of the site to existing services is poor, there are no footways or public rights of way to the village. This will affect how residents choose to travel with it more likely that trips will take place by car.</p>
West Sussex County Council	Kingfisher Farm, West Chiltington Lane, Itchingfield (Section 7.0)	<p>There is no significant flood risk identified for the site.</p> <p>It's recognised that there is an on-going enforcement appeal relating to this site. It's understood that the proposed allocation would only seek to formalise existing activity rather than necessarily increase it. If the site is allocated, improvements should be secured to formalise the existing access arrangement onto West Chiltington Lane. This should include the securing of improvements to visibility.</p> <p>For this and Greenfield Farm sites, although these are close to Barns Green, the accessibility of the site to existing services is poor, there are no footways or public rights of way to the village. This will affect how residents choose to travel with it more likely that trips will take place by car.</p>

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West Sussex County Council	Lane Top, Nutbourne, Pulborough (Section 7.0)	<p>There is no significant flood risk identified for the site.</p> <p>Other than poor accessibility by sustainable modes, there are no other significant constraints. Matters relating to the suitability of the vehicular access have already been reviewed and accepted as part of DC/10/0586. This allowed for a further two pitches, in addition to another that was permitted in 2004. It's noted that this site is allocated in the adopted HDPF; matters relating to the acceptability of the site would have been reviewed and accepted.</p>
West Sussex County Council	Northside Farm, Burnthouse Lane, Rusper (Section 7.0)	<p>Surface water flood risk is indicated at 0.1% Annual Exceedance Probability across much of the site, there are also areas of ponding indicated particularly towards the north east corner.</p> <p>The site is occupied with the proposal only to remove the personal occupancy restriction. In highway terms, the removal of this restriction would not be expected to result in any material change of use of the site.</p>
West Sussex County Council	Oakdene, Blackgate Lane, Codmore Hill, Pulborough (Section 7.0)	<p>The site appears to be at significant risk to surface water flooding.</p> <p>The site has an existing access onto Blackgate Lane. In light of the existing access, there are no apparent issues with the more intensive use of this site and existing access.</p> <p>The site is not well located to nearby facilities to encourage access by non-motorised modes. There is still a footway alongside the A29 that leads into Pulborough.</p>
West Sussex County Council	Parsons Field, Pickhurst Lane, Pulborough (Section 7.0)	<p>There is no significant flood risk to the site itself except along the eastern boundary close to the watercourse.</p>

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		<p>The site is already occupied albeit on a temporary basis until 2019. In highways terms, the impacts of this were considered by way of planning application DC/16/2388 with no severe issues raised. No concerns would be raised if the temporary permission was made permanent.</p>
West Sussex County Council	Rowfold Nurseries, Coneyhurst Road, Billingshurst (Section 7.0) and Sustainability Appraisal	<p>There is no significant surface water flood risk to the site; site is in Flood Zone 1.</p> <p>Objective 2 of the Sustainability Appraisal suggests site occupants could choose to walk to Billingshurst, there is no footway along this section of the A272, nor a crossing point for safe crossing of the A272 linking to the nearest public footpath. It is not considered that a neutral impact for access to community and retail facilities is appropriate.</p> <p>It's noted that this site is allocated in the adopted Horsham District Planning Framework for 10 traveller pitches; matters relating to the acceptability of the site would have been reviewed and accepted.</p> <p>The site has an existing in/out type access onto the A272 Coneyhurst Road. Visibility from the more southerly access point is considered acceptable. Visibility from the north is very poor viewed against current design standards. Ideally the existing arrangements would be formalised with an only single access to the site located on the southern edge of the site. This would then allow for the more northerly access permanently closed. It's unclear if the applicant has sufficient ownership to enable this.</p>
West Sussex County Council	Southview, The Haven, Slinfold (Section 7.0)	<p>No significant surface water flood risk to the site; site is in Flood Zone 1.</p> <p>It is noted that this site is allocated in the adopted Horsham District Planning Framework for 4 pitches; matters relating to the acceptability of the site would have been reviewed and accepted. The site benefits from an existing access. Although, visibility to the north is restricted by a large tree and the horizontal alignment of the carriageway, it is apparent that this is already in use.</p>

Organisation	Section of Document	Summary
West Sussex County Council	Southside, Honeybridge Lane, Dial Post (Section 7.0)	<p>Significant surface water flood risk indicated, particularly towards the north and east areas of the site. These risks would need to be carefully managed in site design.</p> <p>The site is the subject of a current planning application. Further information has been requested through this process. Highway matters relating to the suitability of the site are best considered as part of the current planning application.</p> <p>As a key principle, it's noted that this site is to be used by travelling showpeople. The requirements for showpeople, and more specifically the vehicles (potentially long HGVs) associated with their trade, is more onerous. The fact is not recognised within the proposed allocation. Consideration must be given to the potential and suitability for long vehicles to operate from the site. This includes turning on-site.</p> <p>The site is not well located in terms of access to day-to-day services to encourage access by non-motorised modes.</p>
West Sussex County Council	Alternative Sites (Section 8.0)	These sites have not been considered, as they are not been identified for allocation. If, at a later date, these sites are considered to be allocated the County Council request the opportunity to consider the sites and whether comments should be submitted.
West Sussex County Council	General Comment (West Sussex Joint Minerals Local Plan)	Policy M9 (Safeguarding Mineral Resources), of the Submitted West Sussex Joint Minerals, sets out that sand (sharp, soft and silica) and gravel, brick, making clay, building stone (sandstone) and chalk are regarded as economically important minerals in West Sussex and so it is important they are protected from sterilisation by surface development. The extent of the resources of these minerals that are to be safeguarded is shown as Mineral Safeguarding Areas (MSA) on the policy maps in the Submitted West Sussex Joint Minerals Local Plan.

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		<p>Sites considered for allocation, if they do not meet the exceptions criteria set out in the Draft Minerals Safeguarding Guidance, should be considered against the MSAs and the potential for the unnecessary sterilisation by non-mineral development assessed.</p>
Natural England	General Comment	<p>Natural England does not consider that this Gypsy, Traveller and Travelling Showpeople Site Allocations DPD poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>If you disagree with our assessment of this proposal as low risk, or should proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>
Southern Water	Horsham District Council Depot, Hurston Lane, Storrington (Section 7.0)	<p>Southern Water own and operate Storrington Wastewater Treatment Works (WTW), which processes wastewater arising from the village of Storrington. The WTW is located immediately adjacent to the proposed site, and whilst we endeavour to operate our works efficiently and in accordance with best practice to prevent pollution, unpleasant odours inevitably arise as a result of the treatment processes that occur. Our concern is that the proximity of any 'sensitive' development to the WTW, such as residential and recreational areas, would have an unacceptable impact on the amenity of the site's future occupants arising from the WTW's essential operational activities. Such impacts include odour and noise generated by wastewater processing.</p> <p>This planning principle is established in the document <i>Planning policy for traveller sites</i>,</p>

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		<p>published by the Department for Communities and Local Government (DCLG) in August 2015. Paragraph 13 e) requires local planning authorities to ensure that their policies properly consider the effect of local environmental quality, such as noise and air quality, on the health and well-being of travellers.</p> <p>Paragraph 109 of the National Planning Policy Framework (NPPF) requires the planning system to prevent new development from being put at unacceptable risk from, or being adversely affected by, unacceptable pollution. Annex 2 of the NPPF establishes that pollution includes odour and noise.</p> <p>Furthermore, it should be noted that Southern Water owns the strip of land used as the site's access track, and there are access rights currently in place for the Council's use of the Depot. The WTW operates 24 hours a day, 365 days a year with essential equipment such as pumps and compressors running continually. Furthermore, Heavy Goods and other vehicles frequent the site, therefore unhindered access by Southern Water employees/contractors is required at all times either for routine or emergency maintenance work.</p> <p>Paragraph 6.3.5 of the West Sussex Waste Local Plan 2014 (p42) states that '<i>existing waste sites and infrastructure will be protected from the inappropriate neighbouring developments that may prejudice their continuing efficient operation</i>' and that 'sensitive' uses need to consider a buffer that will depend on the '<i>nature of the proposed 'sensitive' use and on the specific impacts of the current waste operation</i>'.</p> <p>Having regard to the potential impacts of the above on future residents of the proposed site, we are concerned that the allocation of the Horsham Council Depot site may constitute a conflict between land uses, unless effective mitigation can be found and agreed between the relevant site owners/operators.</p>

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Slinfold Parish Council	Southview, The Haven, Slinfold (Section 7.0)	Slinfold Parish Council confirms its previous no objection to the proposals for the Haven subject to planning permission being given as required.
Itchingfield Parish Council	Greenfield Farm, Valewood Lane, Barns Green (Section 7.0)	<p>The Council seeks the deletion of the proposed allocation for 6 pitches at Greenfield Farm, Valewood Lane, Barns Green, Itchingfield on the basis that it is not sound nor based on a sustainability appraisal which meets the legislative criteria.</p> <p>The Council does not agree that such an allocation would have an acceptable cumulative landscape and visual effect with the allocation for 11 pitches at Kingfisher Farm to the north. Contrary to what is suggested in the policy and sustainability appraisal, the sites are only around 100m from one another, not 1-2km. Accordingly, the Parish Council is of the view this allocation would conflict with policy 30 of the Horsham District Planning Framework (2015).</p> <p>Any further allocation within the Parish would be unacceptable due to concentration issues. Even at the current level the small Parish of Itchingfield hosts a large percentage of the current allocation. Even more density/concentration would be unacceptable.</p> <p>The sustainability appraisal fails to consider whether the site forms a part of the setting of Grade II listed Peartree Farm and the extent to which it contributes to the heritage significance of that asset. The sustainability appraisal simply asserts that there will be a neutral impact as it is 'not very close'. That falls well short of an assessment of heritage impact in line with policy 34 of the Horsham District Planning Framework (2015) and NPPF.</p> <p>There is no assessment against the criteria in policy 40 Horsham District Planning Framework (2015) with respects to sustainable transport.</p>

Organisation	Section of Document	Summary
		<p>Contrary to Regulation 12(1) Environmental Assessment of Plans and Programmes Regulations 2012 the Council have failed to assess the reasonable alternatives to the preferred options for allocation. In particular, the Council have failed to consider a more balanced distribution strategy which avoids a cluster of pitches in Itchingfield Parish and neighbouring parishes in the east of the Council's District. As such, the Council have failed to demonstrate that such a distribution strategy creates a 'socially inclusive and adaptable environment ... for gypsies and travellers' contrary to policy 42 Horsham District Planning Framework (2015).</p> <p>Finally, the Council have failed to consider the effects which arise from unrestricted residential use of the pitches as opposed to the present personal planning permissions.</p>
Itchingfield Parish Council	Kingfisher Farm, West Chiltoning Lane, Itchingfield (Section 7.0)	<p>The Parish Council seeks the deletion of the proposed allocation for 11 pitches at Kingfisher Farm, West Chiltoning, Barn Green, Itchingfield Parish on the basis that it is not sound nor based on a sustainability appraisal which meets the legislative criteria.</p> <p>The Parish Council notes that it is recorded that the principle of the development has already been established under a planning appeal (APP/Z3825/A/11/2150329) in 2011 for 11 pitches comprising 11 'residential caravans' and ancillary day-rooms. However, planning permission was not implemented in accordance with the pre-commencement conditions or approved plans and has therefore lapsed. Notwithstanding the current appeal against enforcement proceedings and High Court injunction in place, it is to be noted that in relation to a variation sought to be made to the previously approved appeal (DC/17/1184) and a further application relating to the site (DC/17/1185), the applicant at Kingfisher Farm has stated that the current usage comprises only 6 touring caravans and no ancillary day-rooms (document reference 'existing site: 16_786_002'). This would imply that there is no need at this location for any more than the current disclosed usage by the applicant as the planning permission on appeal was granted 6 years ago and has not been taken up in that extended period of time.</p>

Organisation	Section of Document	Summary
		<p>The Council does not agree that the proposed allocation would have an acceptable cumulative landscape and visual effect when taken together with the proposed adjacent allocation for pitches at Greenfield Farm to the south. Accordingly, the Parish Council is of the view this allocation would conflict with policy 30 of Horsham District Planning Framework (2015).</p> <p>Any further allocation within this Parish would be unacceptable due to concentration issues. Even at the current level the small Parish of Itchingfield hosts a large percentage of the current proposed District Council allocation. Even more density / concentration would be unacceptable.</p> <p>The sustainability appraisal fails to consider whether the site forms a part of the setting of Grade II listed Peartree Farm and the extent to which it contributes to the heritage significance of that asset. The sustainability appraisal simply asserts that there will be a neutral impact as it is 'not very close'. That falls well short of an assessment of heritage impact in line with policy 34 of the Horsham District Planning Framework (2015) and NPPF.</p> <p>There is no assessment against the criteria to be found in policy 40 of the Horsham District Planning Framework (2015) with respects to sustainable transport.</p> <p>Contrary to Regulation 12(1) Environmental Assessment of Plans and Programmes Regulations 2012 the Horsham District Council have failed to assess the reasonable alternatives to the preferred options for allocation. In particular, they have failed to consider a more balanced distribution strategy which avoids a cluster of pitches in Itchingfield Parish and neighbouring parishes in the east of the Council's District. As such, the Council have failed demonstrate that such a distribution strategy creates a 'socially inclusive and adaptable environment ... for Gypsies and Travellers' contrary to policy 42 Horsham District Planning Framework (2015).</p>

Organisation	Section of Document	Summary
		<p>Finally, the District Council has failed to consider the effects which arise from unrestricted residential use of the pitches.</p>
Rusper Parish Council	Northside Farm	<p>Objection to the site as it has never been used as a genuine traveller site and only as a residency for a single family. Concern that the access is not suitable for additional pitches due to the countryside location and access along country lanes. They therefore, we would ask that this site is removed from the site allocation, and that the personal occupancy condition is retained.</p>
West Grinstead PC	Southside	<p>The site is accessed off the A24 which is a dual carriageway with a gap in the central reservation. That access already serves Old Barn Nursery, the Honeybridge Lane Caravan Park and a Penfold Verrall depot/ crusher facility, as well as local residents. The access cannot take long, very slow moving vehicles, such as those required by travelling showpeople, without unacceptable risk of serious accident.</p> <p>There is a current planning application for this use. WSCC have already expressed strong reservations about the access. Grinders Lane is a very narrow lane with no designated passing points and one sharp bend which would only be navigable by long vehicles with great difficulty, if at all. Verge damage undermining the edges of the road would occur. With reference to the Sussex Show Ground HDC's recommendation is, 'it is considered this site is not suitable for the allocation of gypsy and traveller pitches due to its rural location, impact upon the character of the area and potentially the setting of a listed building, Thistleworth Farmhouse. 'We cannot understand why HDC have not expressed similar concerns about this site, as it directly abuts the A24 and is even closer to a listed building, Platts Green Cottage</p>

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GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE

DRAFT SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)

November 2017

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Forward By Claire Vickers (Cabinet Member)

1.0 INTRODUCTION

The Horsham District Planning Framework

- 1.1 In November 2015, the Local Plan for Horsham district (outside the South Downs National Park), known as the Horsham District Planning Framework (HDPF) was adopted. This document now forms the overarching development plan for the district, setting out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs. The plan identifies the housing needs for the District including those required by the Gypsy and Traveller community.

Gypsy and Traveller Accommodation

- 1.2 Chapter Eight of the HDPF sets out how the housing needs for Gypsies and Travellers will be met in the period to 2031. This included the allocation of land for 39 net additional permanent residential pitches for Gypsies and Travellers within the first five years of the plan 2011 – 2017 and a policy setting out the criteria by which any applications for non-allocated sites would be considered.
- 1.3 As the HDPF only provided allocations for Gypsy and Traveller sites until 2017, it was recognised in paragraph 8.8 that further work would be needed to identify and monitor need and to provide for additional pitches beyond the initial five year planning period. It was envisaged that these sites would be identified in a Site Allocations Document¹ and the Planning Inspector examining the HDPF endorsed this approach.
- 1.4 In April 2017, a draft Gypsy and Traveller Site Allocations document was published for a six week consultation. This document set out the number of pitches required to accommodate Gypsies and Travellers in the period to 2031, and identified a number of potential sites in order to meet this requirement. In response to the comments that were received in response to this document, further work has been undertaken over the summer of 2017 and this document is therefore the revised draft Site Allocations document which takes account of this further work.

Gypsy and Traveller Site Allocations Document

- 1.5 This draft Site Allocation Document therefore updates the Council's preferred approach to the provision of sites for Gypsy and Traveller accommodation for further consultation. The format of this document is set out in three main sections as follows:

¹ Please see paragraph 3.27 of the HDPF for context.

- Part A sets out more detail on the national and local context for providing accommodation for Gypsy and Traveller site provision. This includes the definitions of who constitutes a Gypsy, Traveller or Travelling Showperson;
- Part B sets out the results of the Gypsy and Traveller accommodation needs assessment;
- Part C sets out the outcome of the consultation of the previous Site Allocations Document, April 2017, and outlines the further site assessment work undertaken following on from this consultation. The chapter then sets out the preferred locations for the provision for Gypsy and Traveller Accommodation, together with a summary of alternative sites which have been considered.

2.0 PART A: NATIONAL AND LOCAL CONTEXT

National Planning Legislation and Policy

- 2.1 The Housing Act 2004 places a duty on local authorities to produce assessments of accommodation need for Gypsies, Travellers and Travelling Showpeople (GTTS), and outlines how their needs will be met. However, there is no requirement for local authorities to provide such sites on land which they may own.
- 2.2 The main planning policy document relating to GTTS is the 'Planning Policy for Traveller Sites' document (PPTS) that was first published by the Government in March 2012 and updated in August 2015.

Gypsy and Traveller and Travelling Showpeople - Definitions

- 2.3 The PPTS document provides a definition of both 'gypsies and travellers' and 'travelling showpeople' for the purposes of planning policy². Horsham District Council has therefore used these definitions for the purposes of this document.

- **Gypsies and Travellers:** *'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such'; and*
- **Travelling Showpeople:** *'Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.'*

- 2.4 Annex 1 of the PPTS sets out the terms of determining whether people are 'gypsies and travellers' for the purposes of planning policy. It notes that consideration should be given to the following issues amongst other relevant matters

- whether they previously led a nomadic habit of life;
- the reasons for ceasing their nomadic habit of life;
- whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

² As defined in the National Planning Policy for Traveller Sites (PPTS), DCLG, 2015, Annex 1

National Planning Policy Requirements

2.5 The Government's aim is to ensure the fair and equal treatment of travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community. In order to fulfil these aims, the Planning Policy for Traveller Sites document states that local planning authorities should:

- make their own assessment of need for the purposes of planning;
- working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
- plan for sites over a reasonable timescale;
- promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
- aim, through plan-making to reduce the number of unauthorised developments and encampments and make enforcement more effective; and
- increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.

2.6 In terms of practical plan-making for traveller sites within the District, paragraph 9 of the PPTS confirms that local planning authorities should set 'pitch' targets for gypsies and travellers and 'plot' targets for travelling Showpeople as part of the plan making process. (This is defined in Annex 1³). This should address both the likely permanent and transit site accommodation needs of travellers in their area. The document also notes that local planning authorities should:

- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;⁴ and
- identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11 to 15⁵.

³ For the purposes of planning policy, 'pitch' means a pitch on a 'gypsy and traveller' site and 'plot' means a pitch on a 'travelling showpeople' site (often called a 'yard'). The full definition is in the National Planning Policy for Traveller Sites (PPTS), DCLG, 2015, Annex 1.

⁴ To be considered deliverable, site should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing.

⁵ To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

2.7 Paragraph 27 of the PPTS states that if a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites; this should be a significant material consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission. There are exceptions and in Horsham District considerations would include where the proposal is on sites protected under the Birds and Habitats Directives and/or sites designated as Sites of Special Scientific Interest (SSSI); Local Green Space or an Area of Outstanding Natural Beauty (AONB).

Gypsy and Traveller Accommodation Needs Assessment: Guidance (2007)

2.8 The Gypsy and Traveller Accommodation Needs Assessment Guidance produced by the DCLG in 2007 aimed to provide guidance on the carrying out of an assessment of accommodation needs of gypsies and travellers. The guidance was not exhaustive or prescriptive, but outlined a number of basic principles for the assessment.

2.9 Although this publication was formally withdrawn on 9 December 2016 the publication still provides valuable guidance on a number of topics, most notably guidance on the likely rate of household formation and annual population increase. Given that no further national guidance has been provided on such issues through the PPTS, it is considered practical to still have regard to the guidance in the preparation of this accommodation needs assessment at the current time.

3.0 PART B: ACCOMMODATION NEEDS ASSESSMENT

- 3.1 Prior to the publication of the draft Gypsy and Traveller Site Allocation document in April 2017, the most recent Gypsy and Traveller Accommodation needs assessment dated to 2012. This study identified the requirement of 39 pitches in the period to 2017, and formed the basis to support policies 21, 22 and 23 of the Horsham District Planning Framework (HDPF).
- 3.2 This chapter summarises the outcome of the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTANA) which assesses the requirement for GTTS pitches and plots in the district, and has been updated to take account of any changes in circumstances in the Needs Assessment which was published in April 2017 to support the publication of the first draft of the Gypsy and Traveller Site Allocation document at that time.
- 3.3 This GTANA and the April 2017 assessment were conducted 'in-house' with assistance from West Sussex County Council (WSCC). Full details of the assessment methodology and results are set out in Appendix 1, but a summary of this process is set out in the following paragraphs. It is recognised that the need for Gypsy and Traveller accommodation will need to be kept under review whilst progressing towards submission of the Site Allocations of Land Development Plan Document (DPD).

Methodology

- 3.2 The methodology used to assess Gypsy, Traveller and Travelling Showpeople (GTTS) accommodation needs has involved the following steps:
- **Historical data collection and desktop analysis**

This initial stage of the assessment considered existing data such as population size, a review of existing Gypsy, Traveller and Travelling Showpeople sites in the District and a review of planning applications, appeals and enforcement data. This information was used to identify the existing accommodation need for Gypsy, Traveller and Travelling Showpeople in the District.
 - **Predicting future needs in the next 15 years**

This stage of the assessment examined how many new Gypsy, Traveller and Travelling Showpeople sites would be needed in the next 15 years. This number was identified through questionnaires and visits to existing Gypsies, Travellers and Travelling Showpeople in the District. Where families could not be contacted a standard formula for predicting future accommodation needs was applied.

Summary of Results

Historical data collection and desktop analysis

- 3.3 This assessment considered a number of different data sources including, population size and movement of travellers and waiting lists for public sites, together with a review of the existing Gypsy, Traveller and Travelling Showpeople in the District. Each site was assessed as to whether the site was authorised, unauthorised, or had temporary or personal planning permissions.
- 3.4 In April 2017, there were 30 unauthorised pitches in the District and a further 17 pitches with temporary planning permission or personal conditions attached. Together this gives a total existing need (or backlog) of 47 pitches. Since that time, one unauthorised pitch has now been given permission as part of a planning application at Greenfield Farm in Valewood Lane, Barns Green (DC/16/2721). The number of pitches with temporary or personal conditions remains unchanged. In addition, two unauthorised pitches have been removed from the site at Rowfold Nurseries following the grant of a certificate of lawful use on the site. As a result the total existing need (or backlog) is now 44 pitches.
- 3.5 This backlog could be further reduced through bringing forward allocations in the Horsham District Planning Framework the development of existing allocations in the HDPF such as Hillside Park site in Small Dole. The unauthorised sites at Kingfisher Farm are currently the subject of a planning appeal. There is also the potential for a review of existing sites with a personal occupancy condition to examine whether this could also alleviate the backlog of sites.

Predicting future needs in the next 15 years

- 3.6 The first step in predicting future accommodation needs was to conduct a survey using the questionnaire attached in Appendix 2. This questionnaire was sent to 82 separate addresses at 16 separate sites (both authorised and unauthorised). These were followed up with face to face interviews where possible. This included five sites with no postal address.
- 3.7 The outcome of this process identified that there is no additional requirement for sites in the next five year period, with 15 children reaching 18 years old in 6 -10 years and a further 12 children reaching 18 years old in the next 11-15 years. Not all these children will require separate accommodation in the district however, as some will move away. The number of pitches that will be required in the next 15 years has been calculated to be 20.

3.8 In addition to the accommodation need identified from the questionnaires and interviews, a further 65 pitches did not return forms (and/or refused interviews) and could not be interviewed. It was therefore necessary to apply a standard formula to calculate the future additional need from these families. The details of this calculation is set out in Appendix 1.

The total number of pitches required, taking account of the questionnaire and formula is set out below:

Time Period	Pitch requirement
1-5 years – (2017-2022)	9
6-10 years – (2022-2027)	19
11-15 years – (2027-2032)	18
TOTAL	26

3.9 Since the publication of this figure, planning permission has been granted at the Greenfield Farm, Valewood Lane, Barns Green for four new pitches in addition to the authorisation of one existing pitch as discussed in paragraph 3.4 (DC/16/2721). This reduces the number of pitches required in the 1-5 year period by 4. The updated number of pitches required is therefore set out in the table below.

Table 1: Total Pitches required over the next 15 year period

Plan Period	Backlog	1-5 years – (2017-2022)	6-10 years – (2022-2027)	11-15 years – (2027-2032)
Pitches Required	44	5	19	18
Additional pitches permitted since April 2017	4	/	/	/
Total Pitch Requirement from Existing G & T sites	86			

4.0 TRANSIT PROVISION

- 4.1 The Planning Policy for Traveller Sites (PPTS) document (August 2015) sets out the Government's approach to providing transit sites to facilitate travel undertaken by travellers to maintain their traditional way of life. In addition, the PPTS confirms that there is requirement for local planning authorities to co-operate with travellers, their representative bodies and local support groups; the other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and *transit* accommodation needs of their areas over the lifespan of their development plan, in light of historical demand.
- 4.2 The questionnaire (see Appendix 2) contained six questions directed towards transient Gypsies and Travellers to aid the assessment for transit sites (see Questions 14 -19). It is noted that there is currently no authorised transit sites within the Horsham District and indeed, only permanent Gypsy, Traveller and Travelling Showpeople sites have been put forward through the 'call for sites' exercise. The results of the questionnaires and interviews did not yield any requests for transit sites within the District.
- 4.3 As found in the previous Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTANA) published in 2012 in support of the HDPF, in the majority of cases, the Romany Gypsy families living within the District are on permanent sites, or would wish to have permanent sites within the District. In general, it was found through interviews with the resident population that they do not rely on travelling as a way of life or means to find employment, and moreover, that the proximity of educational and health facilities were integral. It was also found that on permanent sites, many of the occupants had been living on the site for a number of years, some for lengthy periods of time of five years or more. The updated definition for 'gypsies and travellers' in terms of planning policy (see paragraph 2.3 of this document) does include those persons of nomadic habit of life that have ceased to travel temporarily on grounds only of their own or their family's or dependent' educational or health needs or old age. There are many examples of such families in the District that have school aged children or health issues.

- 4.4 Although there has been no formal transit site submitted to Horsham District Council as part of its 'Calls for Sites' exercise, a transit site for 9 pitches has been provided in Chichester District for use across the whole of West Sussex. Horsham District Council is part of an agreement amongst the West Sussex authorities to provide a financial contribution towards the capital and revenue costs of its development, management and maintenance. The scheme was funded with a £630,000 grant from the Homes and Communities Agency and £620,000 of funding from the eight District/Borough councils across West Sussex.
- 4.5 The number of unauthorised encampments has remained relatively static in the year following the opening of the new transit site in the Chichester District. Horsham District Council had successfully obtained an injunction in the High Court (May, 2016) to deal with a breach of planning control at Kingfisher Farm, West Chiltington Lane, Itchingfield that related to the unauthorised use of the land for residential purposes by gypsies and travellers; however, this was considered to be an isolated incident and given the high number of caravans present, the use of the West Sussex Gypsy and Traveller Site, which only had a limited number of pitches, was not considered feasible in this case. Further discussions on this specific site are included in Section 7 of this document.
- 4.6 Given the limited number of incursions that the Council experiences with regards to Gypsies and Travellers in the District and the recent implementation of a new transit site for 9 pitches within the neighbouring Chichester District, it has been concluded, that no transit site is required within the District at this stage. Horsham District Council will continue to have dialogue with neighbouring authorities regarding the accommodation needs of transit Gypsy and Traveller families in the wider area, and whether a further transit site is required in the long-term.

5.0 GYPSIES IN BRICKS AND MORTAR ACCOMMODATION

- 5.1 A representation made on the April 2017 consultation suggested the needs of gypsies and travellers living in bricks and mortar accommodation should be taken into account. At present there is no way to monitor this within Horsham District as ethnicity data is not featured on the Housing Register application form. The Council does not own or manage a stock of social housing and therefore does not hold any data in this respect. The Council will keep this matter under review.

6.0 TRAVELLING SHOWPEOPLE ACCOMMODATION NEEDS

- 6.1 It was concluded in the GTANA undertaken in December 2012 that there was no current backlog of provision for Travelling Showpeople. With no details of likely household formation for the period 2012-2017 the projected supply was calculated using a baseline figure of 4 households (plots) and applying a 1.5% family formation compound growth rate. This method only yielded 1 extra plot requirement by 2027. The only current authorised Travelling Showpeople site in the District is The Orchard, Ashington, which has 4 plots and space for storage equipment. No further Travelling Showpeople plots have been authorised since 2012.
- 6.2 The Travelling Showpeople site is not included bi-annual Gypsy and Traveller count as they do not meet the planning policy definition for Gypsies and Travellers and are a separate community. A visit was undertaken in January 2017 to The Orchard in Ashington, but this did not yield any further information on household formation within the site. Further visits over the summer period was not practicable given that such families are predominantly travelling during these months. The Council will continue to make further attempts to speak with the existing families within the site, with the aim of yielding further information from these families prior to preparing the Site Allocations Proposed Submission document. However, given the limited number of existing Travelling Showpeople plots in the District, it is not considered that this would not substantially alter the conclusions of the previous GTANA.
- 6.3 In addition to considering any future needs from the existing Travelling Showpeople site, a small number of questionnaires have been returned to the Council from Travelling Showpeople families that are 'new' to Horsham District Council. The returns from these surveys indicate that there is a need for two pitches from a family residing within the district, with a third who has recently moved from the Guildford area to the Horsham district near to Thakeham. A further three separate families who responded to the survey are currently living in the wider Horsham District area, but are located in the South Downs National Park, which is a separate planning authority. Further discussions regarding the future provision of this need will therefore need to take place with the South Downs National Park Authority.
- 6.4 A site has been submitted to the Council for consideration as a potential allocation as a Travelling Showpeople site. The results of this assessment are set out in Section 7.

7.0 PART C: MEETING NEEDS

THE SITE ASSESSMENT PROCESS

Call for Sites Exercise and Assessment of Publically Owned Land

- 7.1 As discussed in Part B of this report, there is a high requirement for new pitches within the district in order to meet accommodation needs and the Council's requirements against a rolling 5 year supply of pitches as required by the Planning Policy for Traveller Sites (PPTS) document.
- 7.2 Policy 22 of the HDPF sets out how the objectively assessed needs for Gypsies and Travellers will be met beyond 2017, which includes the provision of sites in a Site Allocations of Land Development Plan Document. The policy identifies six potential sources of where new pitches could come forward:
- windfall sites that have come forward through the planning process in accordance with the criteria based policy (i.e. Policy 23 of the HDPF) and are implemented;
 - extensions to existing sites;
 - the redevelopment and redesign of existing sites to provide more efficient use of sites to deliver additional pitches;
 - the allocation of new sites;
 - the use of publically owned land to be developed for publically managed traveller provision;
 - the release of publically owned land to be used as a site available to be purchased and occupied by a Gypsy, Traveller or Travelling Showpeople family.
- 7.3 Other planning policies within the HDPF, and in particular the impact of new sites on rural character, landscape and flood risk have been considered in terms of their impact on potential site allocations.

Site Identification Process

- 7.4 In order to identify potential sites for allocation for Gypsy, Traveller or Travelling Showpeople provision, the Council undertook a 'Call for Sites' exercise in May 2016. This included a Gypsy and Traveller site submission form (see Appendix 5) that could be completed by agents/landowners to suggest sites for consideration. There was a limited response to this method initially, with only a single site suggested during the call for sites period.
- 7.5 The Council also examined its own land holdings and those of West Sussex County Council (WSCC). This resulted in two additional potential sites within the district, both owned by HDC. WSCC confirmed that it does not have any land that would be suitable for this provision in the Horsham District.
- 7.6 The Gypsy and Traveller Site Allocations Preferred Strategy document was published in April 2017, with a six week consultation being held between April and June 2017. Thirteen potential site allocations for GTTS accommodation were identified as part of this consultation together with a number of alternative sites which had been considered. This consultation was carried out in accordance with the Council's SCI, and a wide range of organisations were invited to make comment on the document. In addition the publication of the document was widely advertised and hard copies of the documentation was made available in libraries across the district, as well as being published on the Council's website.
- 7.7 The consultation generated comments from 321 individuals or organisations with a total of 393 representations on different sections of the document. A detailed summary of these representations is set out in the background paper which accompanies this document. As a result of the consultation it was clear that further work would be necessary to demonstrate that a number of sites set out in the consultation document could be delivered. This work was undertaken over the summer of 2017 and the outcomes are set out in more detail in Chapters eight and nine.
- 7.8 As a result of the consultation process three sites; (Fryern Park Farm, Hurston Depot, and Parsons Field) have been removed from the preferred options. The detailed reasons for this are set out in the site details in the next chapter, but include access and environmental concerns. In addition to the removal of the three sites above a further site – Rowfold Nurseries in Billingshurst - cannot be progressed following the granting of a certificate of Lawful use on this site. The owner has subsequently confirmed that the site is no longer available for Gypsy and Traveller use.

7.9 The loss of these potential sites meant that the Council was no longer able to meet its identified need for Gypsy, Traveller and Travelling Showpeople accommodation. It was therefore necessary to undertake further work in order to identify additional sites. Extensive further site identification work has been undertaken, which has included discussions with landowners and agents and has resulted in one new site where the landowner is prepared to make it available for Gypsy and Traveller use. This site is the former Bromeliad Nursery, Billingshurst and has been assessed as being able to accommodate 15 pitches. It can be demonstrated that the site is available and potentially suitable for Gypsy and Traveller use and is therefore proposed to be included for consultation in the updated Site Allocations document.

Policy Context

7.10 Policy 23 of the HDPF sets out the assessment criteria against which new allocations within the Site Allocations DPD must be considered, to ensure that sites are suitable, available and are either deliverable (within the 1-5 year period) or developable (in the 6-15 year period). These are as follows:

- a. There must be no significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where conventional housing would not be suitable;
- b. The site is served by a safe and convenient vehicular and pedestrian access. The proposal should not result in significant hazard to other road users;
- c. The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal. The site must also be large enough to provide adequate vehicle parking, including circulation space, along with residential amenity and play areas.
- d. The site is located in or near to existing settlements, or is part of an allocated strategic location, within reasonable distance of a range of local services and community facilities, in particular schools and essential health services;
- e. The development will not have an unacceptable impact on the character appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings.

- 7.11 For both mixed use sites and/or sites for Travelling Showpeople, the site and its surrounding context must be suitable for mixed residential and business uses, and would similarly not result in an unacceptable loss of amenity and adverse impact on the safety and amenity of the site's occupants and neighbouring properties.
- 7.12 In addition, the requirements of the PPTS have been taken into account when assessing potential sites, particularly paragraphs 13 and 14 of the document in terms of developing traveller sites that are sustainable economically, socially and environmentally. In addition, all physical constraints, such as land levels and flooding, and designations, such as the High Weald Area of Outstanding Natural Beauty (AONB), will be included for the commentary of each site.
- 7.13 Appendix 3 shows the site pro-formas that were used for the assessment of each site as part of a programme of site visits and these incorporate the consideration of the adopted planning policies, and other designations and constraints that would have an impact on potential allocations of land. A list of all sites set out is set out as Appendix 4.
- 7.14 The remaining part of this report deals with each of the sites in turn and provides a summarised commentary of the planning merits, physical constraints and deliverability issues for each site. The next chapter of this report sets out the sites which the Council considers have potential for allocation, and is then followed by consideration of other 'alternative' sites, which were considered through the site assessment process. A map showing the location of the sites across the District is set out on Appendix 6.

8.0 DRAFT SITE ALLOCATIONS

8.1 This section sets out the sites which are considered to have potential for allocation in the Site Allocation of Land document. Any sites that were consulted on in May / June 2017 in this section, but have found to be unsuitable for GTTS pitches, have been moved to the 'Alternative site options' chapter. A summary of the comments received for all sites has been added to the tables and any further work or outcomes are also summarised in the tables below.

Smithers Rough, Guildford Road (A281), Rudgwick	
Site Location and Size	The site is located on the south side of the Guildford Road (the A281) and approximately 1km to the east of Rudgwick. The site is approximately 3.45 Ha in terms of area, although parts of the site are wooded.
Neighbouring uses	Agricultural Land and Residential Dwellings
Proximity to services and facilities	Rudgwick is classified as a 'medium village' for policy 3 of the HDPF (Strategic Policy: Development Hierarchy). The settlement does contain educational facilities and community facilities and it is therefore regarded as a reasonably sustainable location, although there would be some reliance on the private motor car to larger settlements. There is a rural bus service along the A281 that could be used for this purpose.
Access	A new vehicular access would be the main requirement if the site was to come forward within this Site Allocations DPD, particularly as the Guildford Road (A281) is both relatively busy and currently subject to a 60mph speed limit in this location. Specialist advice from the Local Highway Authority at WSCC has been sought. And discussions towards a technical solution are ongoing.

Planning History	The site is partly owned by Horsham District Council and is partly in the ownership of private individuals. The Council did undertake enforcement action in the early 1990's to evict and buy out various owners who had purchased parcels of land on the site with the intention of creating a gypsy and traveller site.
Environmental Considerations	Flood risk (zones 2 and 3) is present at the southern boundary. Development would therefore avoid this part of the site. Mature trees surround the entire site and are partly located within the site, although they are neither subject to a Tree Preservation Order (TPO) or are designated Ancient Woodland. It is noted that ancient woodland is located opposite the site, but this is unlikely to be directly impacted by this proposals. There is also a marginal fall in land levels from north to south. Landfilling has taken place on a portion of the site in the past, and further investigation is necessary, but mitigation is considered likely to be feasible. Any proposal at this location would need to ensure sufficient landscaping mitigation is provided to minimise any impact on rural character.
Summary of Main Consultation Responses	<p>104 representations were received in relation to this site including three comments from statutory consultees.</p> <p>Both WSCC and the Environment Agency noted that Flood zones 2 and 3 are present at the southern boundary. The EA stated that a sequential approach would be necessary to ensure no development takes place in this part of the site. In addition WSCC noted that there is evidence of surface water flows towards the western boundary, but that risks could be managed through design / layout. WSCC also raised concerns regarding the vehicular access. However it has since been confirmed that a suitable access can be achieved.</p> <p>Proximity a former landfill and the need for further investigation and mitigation was identified.</p> <p>Rudgwick Parish Council objected to the proposed allocation largely due to the highway access constraints and the lack of pedestrian links to the site. Public comments also raised concerns regarding the lack of adequate vehicular/pedestrian access to the site; the impact upon natural environment, particularly in terms of flood risk and the loss of habitats and its perceived remoteness from the village</p>

Recommendation	Now that further technical assessment has been carried out and a satisfactory highway access has been identified, the site is considered suitable for 15 pitches. Further investigation regarding the landfill is necessary but initial advice from Environmental Health is that such mitigation is likely to be achievable.
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Oakdene, Blackgate Lane, Codmore Hill, Pulborough



<p>Site Location and Size</p>	<p>The site is located to the northwest of the Built-up Area Boundary (BUAB) of Codmore Hill (at approximately 0.6km) and is located a shorter distance to Stane Street (the A29). There are four existing pitches present on the site with room for expansion to the south of the access lane for a further three pitches The total site area is 0.91ha</p>
<p>Neighbouring uses</p>	<p>Agricultural and woodland. There are some residential properties north of the site.</p>
<p>Proximity to services and facilities</p>	<p>Pulborough and Codmore Hill is classified as a 'small town and larger village' through policy 3 of the HDPF (Settlement Policy: Development Hierarchy) and contains both educational and community facilities. However, the existing and proposed occupiers of the site would be in part, reliant on the private motor vehicle for most of their journeys</p>
<p>Access</p>	<p>The existing vehicular access is considered suitable for the existing 4 pitches on site. A separate assessment of the access for additional pitches proposed through the current planning applications on this site will need to be undertaken through the planning application process.</p>
<p>Planning History</p>	<p>There are four existing pitches at the site that all subject to personal occupancy conditions through planning permissions (see reference PL/115/99 and DC/12/2093).</p> <p>Since April 2017 an application to retain the four existing pitches has been submitted (DC/17/2121). In addition to an application to facilitate five additional pitches onsite (DC/17/2084). Depending on the outcome of</p>

	the application the needs assessment may need to be updated in due course.
Environmental Considerations	On the western boundary of the site is ancient woodland (Gerrards Rough). It is not considered that the addition of three pitches to the south of the existing access track would not cause harm to the existing ancient woodland in this case. Further landscaping and screening, particularly on the southern boundary of the site, may be required to ensure that the rural character of the area is not significantly impacted in this case. The site does not appear to be in the draft minerals safeguarding area and is below the threshold of 10 residential dwellings in any event. (NB -This is a separate assessment to the planning applications on this site).
Summary of Main Consultation Responses	<p>There were only three representations in relation to this site including one comment from WSCC. This stated that the site appears to be at risk of surface water flooding; this has not been mentioned in previous planning applications but whilst further investigations are ongoing it is considered that this matter can be resolved. There were no concerns with the existing access being intensified.</p> <p>The two public comments had concerns in relation to the narrow lane and access to the site; the impact upon the landscape and the environmental impact of the scheme.</p>
Recommendation	It is considered that this site is suitable seven pitches comprising the removal of a personal occupancy conditions attached to the existing 4 pitches and 3 additional pitches. Further work would be required in relation to landscaping and to ensuring that the rural character of the area is retained, and ensure that there is no surface water flood risk to any occupants on the site.

Greenacres, Hillside Lane, Small Dole, Upper Beeding

	
<p>Site Location and Size</p>	<p>The site is located approximately 0.5km to the south of Small Dole. The site area is approximately 0.45 Ha and is located to the south of the existing Hillside Park site owned by Horsham District Council.</p>
<p>Neighbouring uses</p>	<p>An existing Gypsy and Traveller site and reclamation yard to the north and east. Agricultural land/woodland is located to the west and south.</p>
<p>Proximity to services and facilities</p>	<p>Small Dole is classified as a 'smaller village' within policy 3 of the HDPF (Strategic Policy: Development Hierarchy), which has some limited services. The occupiers of the site are reliant upon the larger settlements of both Upper Beeding and Henfield for their educational and community needs.</p>
<p>Access</p>	<p>The existing vehicular access from the A2037 site can be used.</p>
<p>Planning History</p>	<p>12 pitches are currently occupied and unauthorised, but have been tolerated for a number of years. This site was allocated for 12 pitches within policy 21 of the HDPF (Strategic Policy: Gypsy and Traveller Sites Allocations) and was named in that policy as 'land adjacent Hillside Park, Small Dole'. This private site, combined with the Horsham District Council owned site of Hillside Park to the north would amount to 24 pitches.</p>
<p>Environmental Considerations</p>	<p>The eastern boundary of the existing allocation does border the South Downs National Park (SDNP). It is also considered that the further intensification or expansion of this site would be inappropriate, particularly given the relatively small size of Small Dole. It is recognised that adequate foul drainage will need to be provided on this site as set out in the response from the Environment Agency.</p>

<p>Summary of main consultation responses</p>	<p>Four representations were received in total. Two from statutory consultees, the Environment Agency and West Sussex County Council. West Sussex County Council recognised that this is an existing allocated site and that there are already traffic movements site, and did not raise any further issues. It was however indicated that is surface water flooding to the north but not affecting the site. The Environment Agency raised the need for adequate foul drainage to be provided on the site, but recognised that this has been addressed in policy 23 of the HDPF.</p> <p>Comments from local residents raised concerns regarding the cumulative impact that this development would have taking into account the total number of Gypsy and Traveller pitches in the area, and the pressure that this was placing on local services and facilities.</p>
<p>Recommendation</p>	<p>To continue with the existing allocation of 12 pitches within the HDPF and to consider what powers could be used to expedite the authorisation of the site and to help reduce the backlog. It is considered that the site is not suitable for any further expansion or intensification.</p>

Greenfield Farm, Valewood Lane, Barns Green, Itchingfield



Site Location and Size

The Greenfield Farm site is located to the north of Valewood Lane and to the west of Barns Green. The site is located approximately 1.2 km from Barns Greens. The site area is approximately 4.7ha.

Neighbouring uses

Residential dwellings to the east, agricultural land to the west and woodland and agricultural land to the south. To the north is Kingfisher Farm, which is also in use as a Gypsy and Traveller site (see page 30).

Proximity to services and facilities

Barns Green is classified as a 'medium village' within policy 3 of the HDPF and contains an infant school, village store and community facilities, albeit reliant on larger settlements to meet a number of requirements. In planning cases relating to this site it has been concluded on all occasions that whilst the use of the private car is likely to remain the predominant mode of transport, the site itself is not in a remote or isolated location as some services (such as the infant school) are quite close to hand.

Access

The site is accessed from Valewood Lane.

Planning History

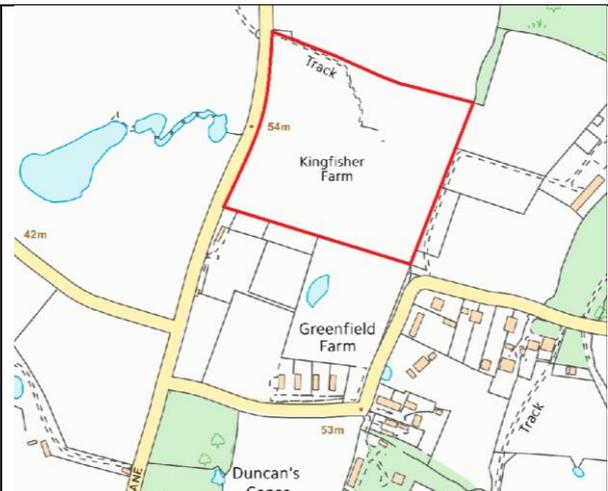
The total number of authorised pitches on site is 10 pitches, albeit 5 are tied to the applicant and their family (see DC10/0721 and DC/12/0298). The recently permitted DC/16/2721 changed the single unauthorised caravan onsite to authorised and granted permission for an additional 4 touring caravans

Environmental Considerations

There are no significant planning designations or physical constraints that would have a significant impact upon the existing site. The site is relatively well screened from West Chilton Lane and Valewood Lane by the existing trees and hedges that run along the western, eastern and southern boundaries of the site, although the retention of roadside

	vegetation is important to ensure that this remains.
Summary of main consultation responses	<p>Four representations were received on this site in total, including two from statutory consultees; Itchingfield Parish Council and WSCC.</p> <p>Itchingfield Parish Council were concerned in particular in relation to the cumulative impacts with Kingfisher Farm to the north and WSCC as the Local Highway Authority noted that as the sites are already in existence no additional trips would be generated by this proposal.</p> <p>The public comments raised concerns regarding the cumulative impact of development with the Kingfisher farm site and the impact of this on the services and facilities in Barns Green.</p>
Recommendation	The cumulative impact of the existing number pitches together with Kingfisher Farm to the north is noted. However the five sites are existing authorised pitches (albeit with personal permission) and it is considered appropriate that these pitches could be ‘fully’ authorised and the personal permission be removed.

Kingfisher Farm, West Chilmington Lane, Itchingfield



Site Location and Size

The Kingfisher Farm site is located to the east of West Chilmington Lane and to the west of Barns Green, with the site located approximately 2.2 km from Barns Greens by road and approximately 1.6 km on foot. The site area is approximately 4.85 ha

Neighbouring uses

Agricultural land to the north, west and east. To the south is the Greenfield Farm Gypsy and Traveller site (see previous assessment).

Proximity to services and facilities

Barns Green is classified as a 'medium village' within policy 3 of the HDPF and contains an infant school, village store and community facilities, albeit reliant on larger settlements to meet a number of requirements. Whilst the use of the private car is likely to remain the predominant mode of transport, the site itself is not in a remote or isolated location as some services (such as the infant school) are quite close to hand.

Access

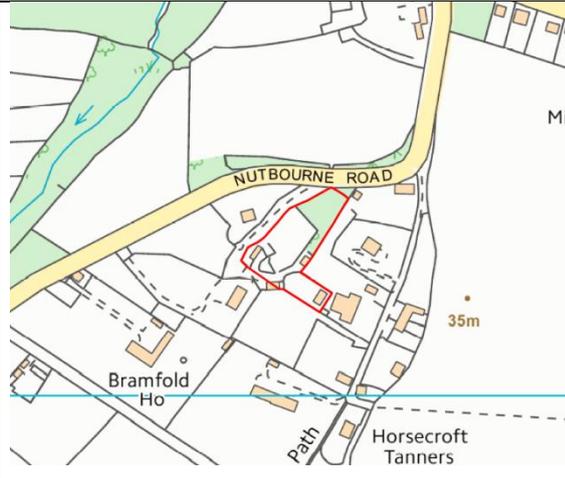
The site is accessed from West Chilmington Lane. WSCC have indicated that improvements to visibility will be necessary if this site is allocated.

Planning History

The principle of the development has already been established under a planning appeal (APP/Z3825/A/11/2150329) in 2011 for the 11 pitches. Planning permission was not implemented in accordance with the pre-commencement conditions or approved plans. Horsham District Council successfully obtained an injunction in the High Court (May, 2016) to deal with a breach of planning control at Kingfisher Farm, West Chilmington Lane, Itchingfield and an enforcement appeal is ongoing.

<p>Environmental Considerations</p>	<p>There are no significant planning designations or physical constraints that would have a significant impact upon its allocation although adequate foul drainage will need to be provided. For the appeal process in 2011, the Council considered that the proposal for 11 pitches would not have a material adverse impact on the visual amenities of the rural area. The Inspector agreed that the main body of the site is set well back from West Chiltonton Lane, the mature tree screening along the road frontage is extensive and there are limited wider public views of the site.</p>
<p>Summary of Main Consultation Responses</p>	<p>Six comments were made in relation to this site, including three from statutory consultees. There was a strong objection by Itchingfield Parish Council, confirming that it would have an unacceptable impact on landscape, would concentrate the Gypsy and Traveller community in one location, and moreover, the Council has failed to consider a more distributive strategy.</p> <p>WSSC noted that as this site was regularising existing activity trips would not increase over existing albeit that most would be by car. Improvements to the visibility out on to West Chiltonton Lane were suggested.</p> <p>The Environment Agency raised the need for adequate foul drainage to be provided on the site, but recognised that the need for such provision is set out in policy 23 of the HDPF. This has been reflected in the updated site information.</p>
<p>Recommendation</p>	<p>The cumulative impact of 11 pitches together with the Greenfield Farm is noted. It is however considered that this site would be suitable for allocation of 11 pitches, and indeed the principle of this development has already been established for this number of pitches. The ongoing enforcement appeal and its outcome will need to be considered when available.</p>

Lane Top, Nutbourne, Pulborough



<p>Site Location and Size</p>	<p>The site is located 0.7km to the northwest of West Chiltington Common and 1.7km east of Pulborough. The site area is approximately 0.5 ha.</p>
<p>Neighbouring uses</p>	<p>Land around the site is bounded by a number of low density residential properties.</p>
<p>Proximity to services and facilities</p>	<p>Pulborough is classified as ‘small town and larger village’, whilst West Chiltington is classified as ‘medium village’ within policy 3 of the HDPF (Strategic Policy: Development Hierarchy). The site is in reasonable proximity to a range of services and facilities, albeit that there will be some reliance on the private car.</p>
<p>Access</p>	<p>The site is accessed from Nutbourne Road. Vehicular accesses has been considered in previous planning applications on the site (DC/10/0586) and it was considered to be acceptable providing that the appropriate visibility splays were provided.</p>
<p>Planning History</p>	<p>This site has permission for three pitches with personal occupancy conditions. It was therefore proposed that these were converted to a ‘full’ authorisation, and was therefore allocated for 3 pitches within policy 21 of the HDPF (Strategic Policy: Gypsy and Traveller Sites Allocations) for this purpose. This would not increase the number of pitches already on the site. As yet the site has not come forward through formal planning processes.</p>
<p>Environmental Considerations</p>	<p>The boundaries of the site are well screened by mature trees that would be appropriate to retain; the site is hardly visible from any public viewpoints. The site is within the draft minerals safeguarding area for soft sand as set out in the draft WSCC Minerals Plan. This site is not proposing additional dwellings and is less than 10 residential dwellings and the site and area threshold and it is therefore</p>

	not considered that any additional consideration of this issue is required at this stage.
Summary of Main Consultation Responses	Three representations were submitted in relation to this site, one of which was in full support. Another requested that the number of pitches being proposed on this site be clarified as this was not clear in the report. WSCC noted that the existing vehicular access has already been reviewed and accepted as part of previous planning applications.
Recommendation	To continue with the existing allocation of 3 pitches giving the 3 existing personal permissions full authorisation.

Northside Farm, Burnthouse Lane, Rusper



Site Location and Size

The site is located within open countryside, approximately 1.8 km from the nearest settlement of Rusper. The large town of Crawley is 3km to the east. The site is approximately 3.2 ha.

Neighbouring uses

Agricultural Land.

Proximity to services and facilities

Rusper is considered only a 'small village' by policy 3 of the HDPF (Strategic Policy: Development Hierarchy), which are considered to have limited services, facilities, social networks but with good accessibility to larger settlements. A greater range of facilities is available either in Crawley or Horsham. Occupiers of the site would be heavily reliant upon private modes of transport in this location.

Access

The site is accessed from Burnthouse Lane.

Planning History

This site acquired planning permission in June 2015 (see reference DC/14/2385) for a maximum of 3 caravans. The site is tied by a personal occupancy condition to the applicant and his family only and if the family cease to occupy the site, the land would need to be restored to its previous use as pasture land.

Environmental Considerations

There is potential for impact upon the rural character of the area and this was considered as part of the planning application on the site. The site contains a number of rural (agricultural/equestrian) buildings in varying states of repair and the residential accommodation is located within this existing part of the site. The site is screened by mature trees that border Burnthouse Lane on the southern boundary of the site; views are still possible from the public highway that is at odds with the existing character of the area. However, given the existing buildings on site and the location of the caravans on the northern

	<p>boundary of the site, the harm to character of the area has been reduced, with further work on screening the site still possible if the personal occupancy condition was to be removed.</p>
Summary of Consultation Responses	<p>There were 25 comments on the proposed allocation with three from statutory consultees. West Sussex County Council noted that there was surface water flood risk across much of the site. Given that this would have been a consideration when granting personal occupancy, the removal of the personal occupancy condition is not considered to result in a material change of the use of the site in either flood risk or highway terms.</p> <p>The Environment Agency stated that adequate foul water drainage would need to be provided, but recognised that this matter is covered by Policy 23 of the HDPF.</p> <p>Rusper Parish Council objected to the site on the grounds that it had never been used as a genuine traveller site but as a residency for a single family and that it is not suitable for additional pitches due to its rural location.</p> <p>The public comments largely centred on the impact on the natural environment and the landscape characteristics of the site; there were also concerns relating to the vehicular access and the remoteness of its location.</p>
Recommendation	<p>It is considered that the removal of the personal occupancy condition on this site will not have any additional impacts on flood risk and highways as no additional pitches are proposed. There is an opportunity to identify possible mitigation measures in relation to the rural character.</p>

Southview, The Haven, Slinfold



<p>Site Location and Size</p>	<p>The site is located to the west of the A29 (Stane Street) along the Haven Road, to the northwest of the unclassified settlement of Five Oaks. The site area is approximately 0.95 ha.</p>
<p>Neighbouring uses</p>	<p>The land is bounded by a small copse to the north and south with agricultural land beyond. West Sussex County Council owns the Gypsy and Traveller site of Cousins Copse that is located to the south.</p>
<p>Proximity to services and facilities</p>	<p>Slinfold is approximately 3km away. Slinfold is classified as a 'medium village' within policy 3 of the HDPF (Strategic Policy: Development Hierarchy) and contains a primary school and other community facilities. The existing occupiers of the site are relatively reliant upon private motor vehicle journeys owing to their location.</p>
<p>Access</p>	<p>The site is accessed from Haven Road. The vehicular access to the site is considered adequate and there would be space to improve this aspect of the site if required by the Local Highway Authority.</p>
<p>Planning History</p>	<p>This site was allocated for 4 pitches within policy 21 of the HDPF (Strategic Policy: Gypsy and Traveller Sites Allocations) but has not yet come forward through the formal planning processes. There are 4 pitches that are unauthorised, (but tolerated) at the application site.</p>
<p>Environmental Considerations</p>	<p>The boundaries of the site are well screened by mature trees, which should be retained. There are no significant planning designations or physical constraints that would affect the existing site.</p>

Summary of Consultation Responses	Two statutory comments were received on this site from Slinfold Parish Council and West Sussex County Council. Slinfold PC had no objection to the proposal and WSCC had minor concerns in relation to highway visibility to the north of the site due to a large oak tree, but recognised the existing use of the site.
Recommendation	To continue with the existing allocation of 4 pitches within the HDPF and to consider what options could be used to expedite the authorisation of the site to help fulfil the backlog.

Bromeliad Nurseries, Marringdean Road, Billingshurst	
<p>Site Location and Size</p>	<p>The 2.5ha site is located in a rural location to the south east of Billingshurst. The site comprises a number of redundant light industrial units and hard standing</p>
<p>Neighbouring uses</p>	<p>The site is bound by agriculture and grassland to the north and west and by Marringdean Road to the east. The southern boundary of the sites abuts Steepwood View which is a residential building and further grassland</p>
<p>Proximity to services and facilities</p>	<p>The site is in a rural location, approximately 1.9km away from the settlement edge of Billingshurst. Billingshurst is classified as a 'small town and larger village' within policy 3 of the HDPF (Strategic Policy: Development Hierarchy) and contains educational, health and community facilities. The site is relatively close to those facilities but will still be reliant on the private car to access these services and facilities.</p>
<p>Access</p>	<p>Access into the site from Marringdean Road is wide and appears to have good visibility. Articulated lorries have previously utilised the it is considered that access to the site should be achievable. There is no pedestrian pavement on Marringdean Road at the current time.</p>
<p>Planning History</p>	<p>The site received a certificate of lawful use (BL/119/00) for light industrial/warehousing in 2001 and a further planning permission for 3 agricultural/storage/assembly/ packing buildings and glasshouse and office building (DC/05/1098). These activities have now ceased and the site is vacant. The landowner has indicated that they wish to dispose of the site.</p>

Environmental Considerations	The existing sheds on the site are known to contain asbestos, and these would need to be disposed of carefully prior to any occupation on the site and previous uses may have stored petroleum containers on site which will require remediation. Essential services, such as sewerage will need to be provided
Summary of Main Consultation Responses	This is a new site and as such was not included in the previous consultation
Recommendation	It is considered that this site would be suitable for the allocation of 15 pitches, subject to the provision of essential services such as sewerage and necessary removal of contaminants on the site.

Southside, Honeybridge Lane, Dial Post



Site Location and Size

The site is located to the east of the A24 near Dial Post. The site is approximately 3.6ha in size. The site has been proposed as a site for travelling showpeople as opposed to the Gypsy and Traveller community.

Neighbouring uses

The land is bounded to the north by the Old Barn Nurseries garden centre and to the west by the A24. Land to the east of the site is a caravan park. To the south, the land is in agricultural use.

Proximity to services and facilities

Dial Post is considered an 'unclassified settlement' in policy 3 of the HDPF (Strategic Policy: Development Hierarchy) that is defined as a 'settlement with few or no facilities or social networks and limited accessibility, that are reliant on other villages and towns to meet the needs of residence.' Such settlements are considered to be least sustainable in the development hierarchy and the occupiers of the site would be heavily reliant upon private motor vehicles.

Access

The site is accessed from Honeybridge Lane to the north of the site. The road is already accessible to caravans given the use to the site to the east for this purpose.

Planning History

The site is subject to an ongoing application for 5 travelling showpeople plots (DC/17/0387). Two previous applications on this land have been withdrawn (DC/16/1340 and DC/15/0807).

Environmental Considerations

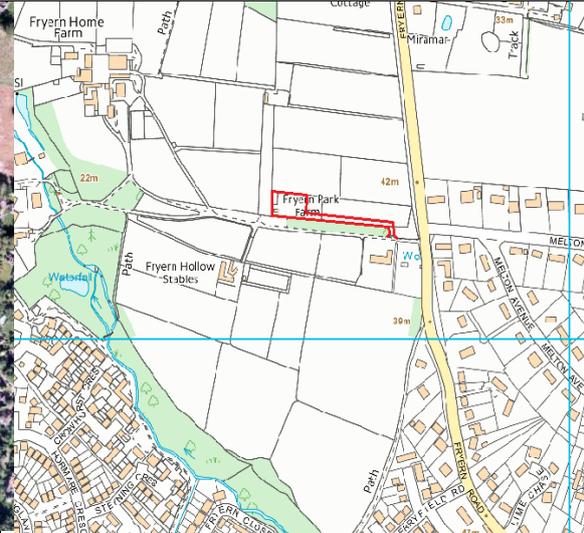
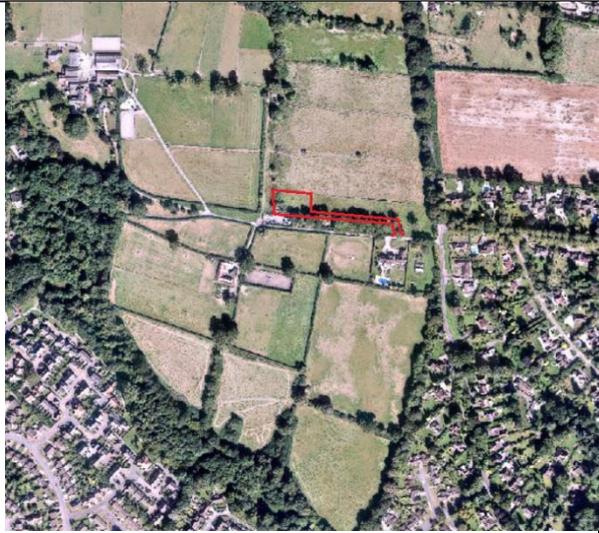
The site is bounded on all sides by mature trees. The site is adjacent to the A24 to the west and may therefore be subject to noise

	impacts which may need mitigation in the form of bunds.
Summary of Main Consultation Responses	<p>Seven representations were received on the site in total. There were five public objections to the site largely in relation to access and safety.</p> <p>WSCC confirmed that (a significant surface water flooding to the north and east and b) that further information is required as part of the current planning application in terms of access arrangements.</p> <p>West Grinstead PC expressed concerns in terms of access and the particular needs of Travelling Showpeople in terms of Heavy Goods Vehicles.</p>
Recommendation	Subject to any additional needs of the Travelling Showpeople community being confirmed, this site has potential for allocation for this use. The site may however require noise mitigation due to the proximity to the A24, which could potentially reduce the deliverability of the site in the shorter term. The outcome of the ongoing application will need to be kept under review as the preparation of the Site Allocations of Land document progresses.

9.0 ALTERNATIVE SITES

- 9.1 In addition to the sites set out in Section 7, which are considered to have some potential for allocation for Gypsy and Traveller accommodation, a number of other sites have also been considered by the Council, but for a number of reasons are not considered to have potential for allocation. This includes some sites which were considered to have potential for allocation in the draft Gypsy and Traveller Site Allocation document but following further investigation are not considered appropriate for allocation. The following chapter contains details on each of these sites.
- 9.2 In addition to the sites set out in the following tables, three sites were screened out of this assessment process entirely. Two of these, at Adversane, Stane Street near Billingshurst, and Cousins Copse, the Haven, near Slinfold are owned by West Sussex County Council. The county has confirmed that there is no prospect of expansion on these sites, and they do not own the surrounding land, so cannot expand into surrounding land. The final site screened out of the assessment was Hillside Park, at Small Dole, which is an existing site owned by this Council. This site does not have any capacity for further expansion within the site, and there is no prospect of expansion of this land due to environmental constraints including the adjoining district boundary (the South Downs National Park) and the existing Gypsy and Traveller site to the south, which is already allocated in the Horsham District Planning Framework.

Fryern Park Farm, Fryern Road, Storrington



Site Location and Size

Located to the west of Fryern Road, with the existing site access opposite Melton Drive, Storrington. The total size of the land owned is 1.82 Ha, although it is expected that only smaller part of the land could be available for pitch provision. The site has been put forward by a private land owner for between 3 and 5 pitches.

Neighbouring uses

There are several residential and equestrian buildings located to the south of the site, although it has been anticipated that any proposed pitches would be located to the southwest corner of the site, approximately 100 metres to the west of the nearest residential property.

Proximity to services and facilities

The site is located in close proximity to the Built-up Area Boundary (BUAB) of Storrington, to the north of village. Storrington and Sullington, is categorised as a small town and larger village within Policy 3 of the Horsham District Planning Framework (HDPF) (Strategic Policy: Development Hierarchy). Therefore, the site is considered to be in a relatively sustainable location, with access to both health services and education.

Access

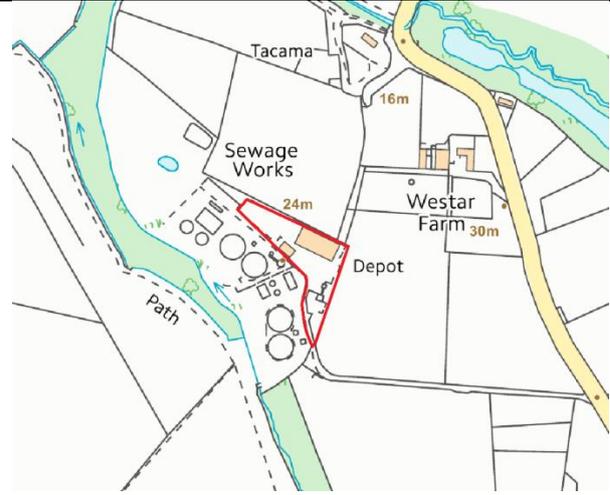
The site accessed via a single track, which runs along the southern boundary of the site; this access track is also a designated public right of way. It is likely that the existing vehicular access to the site would require improvement and widening given the type of use proposed. A number of concerns regarding right of access on this site was raised during the consultation and at the current time this has not been resolved.

Planning History

The land has been subject to several planning applications in recent years, the latest of which was granted planning permission (see reference

	DC/16/1659) for the erection of a replacement 4 bay stable and hay barn.
Environmental Considerations	There is mature tree screening on the eastern side of the site, beside the Fryern Road, albeit that this can be sporadic in places. In addition, there are mature trees on the southern boundary of the application site that could be retained through this process. Views to the site from a westerly and northerly direction are relatively open however and would require a degree of screening, given the sites' location in the countryside.
Summary of Main Consultation Responses	<p>There were 58 consultation responses in relation to this site. The responses included statutory comments from Storrington & Sullington Parish Council and WSCC.</p> <p>WSCC confirmed that access to the site from the public highway (Fryern Road) is too narrow to allow two opposing vehicles to pass. The access track is not owned by the applicant meaning new access would likely be required causing land ownership issues.</p> <p>Storrington and Sullington Parish Council stated that due to its position outside the BUAB, it would contradict policy 26 of the HDPF and that it would set a precedent for other residential development at the site.</p> <p>Public comments were concerned in relation to the access to the site; the environmental impact of new development within the countryside and its aesthetic qualities.</p>
Recommendation	Following consultation concerns were raised as to how this site could be accessed due to the potential land ownership issues. As such the site is no longer considered suitable for inclusion in the document at this stage.

Horsham District Council Depot, Hurston Lane, Storrington



Site Location and Size

The site is located approximately 0.4km to the northwest of the Built-up Area Boundary (BUAB) of Storrington and is located to the west of Hurston Lane.

Neighbouring uses

Agricultural land and sewage works

Proximity to services and facilities

The site is located within close proximity to both community and educational facilities within the settlement and would meet the criteria set out in policy 23 (1) (d) of the HDPF that require the site to be located in or near to existing settlements, within a reasonable distance of a range of local services and community facilities, in particular schools and essential health services.

Access

The access arrangements for the site are constrained, with the access road being narrow and with few passing places. Southern Water have confirmed Southern Water own the access track and that it is in use 24 hours a day to allow routine or emergency maintenance. WSCC indicated that additional passing places, and given the land ownership this is unlikely to be available

Planning History

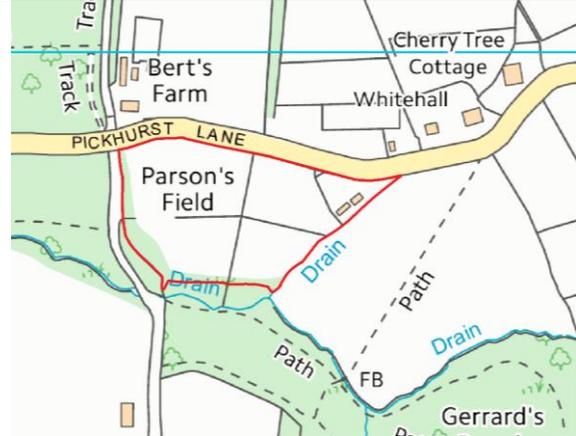
The site has been used as a depot by Horsham District Council.

Environmental Considerations

The land is adjacent a sewerage works, that would have implications for residential occupiers of the site in terms of noise and odour; the land is located in the open countryside and is not well screened to either the north or east of the proposed site, so development has the potential to harm the character of the countryside (albeit, that there is an existing industrial building on site); and the land is located only 60 metres away from a designated flood zone (2 and 3) to the southwest of the site.

<p>Summary of Main Consultation Responses</p>	<p>There were 53 specific consultation responses in relation to the potential allocation of this site for GTTS. The responses included statutory comments from Southern Water, WSCC and Storrington & Sullington Parish Council.</p> <p>WSCC confirmed that the lane to this site is narrow and would require a further passing place along the private access road leading from Hurston Lane.</p> <p>Southern Water objected to the site and confirmed that they owned the strip of land used as the site's access track, and there are access rights currently in place for the Council's use of the depot. The WTW operates 24 hours a day, 365 days a year with essential equipment and it is therefore considered that the allocation of the Horsham District Council Depot site would conflict between land uses. HDC's Environmental Health Team agrees with this conclusion.</p> <p>Storrington and Sullington Parish Council stated that although they preferred this site, it too lies outside the BUAB and is therefore in a countryside location in conflict with policy 26 of the HDPF.</p> <p>Public comments were made in relation to the highway access, the impact upon the landscape character of the area and concerns for the health and welfare of future occupiers of the site given the proximity of the sewage works.</p>
<p>Recommendation</p>	<p>Due to the access constraints and proximity to the sewage works it is recommended that the proposed allocation is removed from the document.</p>

Parsons Field Stables, Pickhurst Lane, Pulborough



Site Location and Size

This site is located approximately 1.08 km to the northwest of Codmore Hill and 0.6 km away from the A29. The site area is 1.72ha.

Neighbouring uses

Woodland to the west and south and pasture land to the east. Pickhurst Lane bounds the site to the north along with a few isolated rural dwellings.

Proximity to services and facilities

The closest settlement to the site is Pulborough and Codmore Hill that is classified as 'small town and larger village' with policy 3 of the HDPF, which has good range of services and facilities, such as educational and health facilities and a railway station, located 3.4km to the south. There would still be some reliance on the private car.

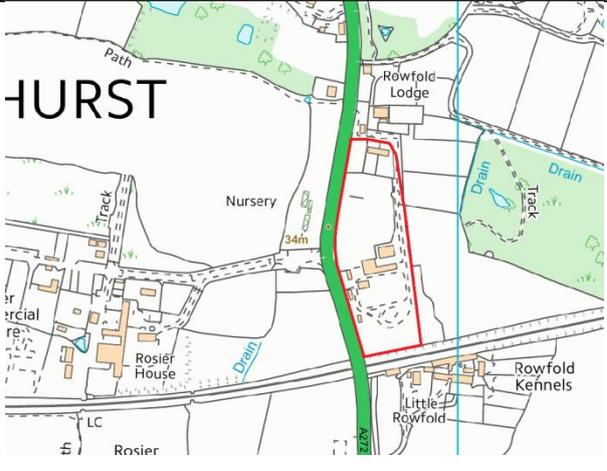
Access

The site is accessed from Pickhurst Lane to the north. This road connects to the A24 via Blackgate Lane. Local residents have highlighted that there have been accidents at this junction with the A29. As the site is already in use and impacts on traffic were considered during the recent planning application on the site, WSCC has confirmed that these impacts were not assessed as severe.

Planning History

A planning application for the change of use of land to a caravan site for stationing of up to three caravans (two pitches with two mobile homes and one touring caravan) and associated development (see reference DC/16/2388) was approved on a temporary basis until the 31 December 2019; the main reason for this was to consider the site as part of the draft Site Allocations of Land Development Plan Document (DPD). An earlier appeal (APP/Z3825/A/14/2218650) stated that the harm to the rural character and appearance of the countryside was considerable.

<p>Environmental Considerations</p>	<p>Whitehall Cottage, which is Grade II listed is located approximately 60 metres to the east of site. The most recent planning application considered the additional planting undertaken by the owner of this site and the distances between the properties and was found to be sufficient to not result in harm to the amenities of neighbouring occupiers or the setting of the listed building although this conflicts with earlier appeal decisions where the landscape impact were found to be unacceptable. There is potential for development on this site to have an adverse impact on rural character, but it is considered that the existing hedgerow planting (that could be supplemented further) does mean that the existing mobile homes are not overly prominent within the street scene.</p>
<p>Summary of Consultation Responses</p>	<p>58 representations were received on this site and the vast majority of which were objections. There was one statutory comment from WSCC confirming that in highway terms, there would be no objection to a permanent site in this location as there would be no severe impacts to the road network as identified in an earlier planning permission.</p> <p>The public and community comments predominantly raised concerns regarding the narrow road access to the site and also highlighted that the known impact to the landscape character and nearby listed building would become permanent.</p>
<p>Recommendation</p>	<p>Having undertaken further review of this site, and the permanent use of the site for the stationing of two mobiles homes is considered to be detrimental to the rural character of the area in the longer term. Potential options to mitigate the acknowledged impact upon the character have been considered but on balance the recommendation is to remove the site from the document on the grounds of impact to the landscape and historic impact.</p>

Rowfold Nurseries, Coneyhurst Road, Billingshurst	
	
Site Location and Size	The site is to the east of Coneyhurst Road and approximately 1km east of Billingshurst. The site area is approximately 1.65ha.
Neighbouring uses	The site is predominantly surrounded by agricultural land. Rowfold Lodge is located on the northern boundary of the site.
Proximity to services and facilities	Billingshurst is classified as a 'small town and larger village' within policy 3 of the HDPF (Strategic Policy: Development Hierarchy) and contains educational, health and community facilities. The site is relatively close to the facilities although some reliance on the private car will still remain.
Access	The site is accessed from Coneyhurst Road. The access road into the site is narrow and the existing highway access may therefore need to be enhanced.
Planning History	In April 2017 there were 2 unauthorised pitches on this site. This site was allocated for 10 pitches within policy 21 of the HDPF (Strategic Policy: Gypsy and Traveller Sites Allocations) but had not yet come forward through the formal planning process. Since this time the site has been granted a Certificate of Lawful Use and the unauthorised pitches have been removed. The site owner has confirmed that the site is no longer available for Gypsy and Traveller accommodation.
Environmental Considerations	The site is well screened at its western boundary by mature trees and is relatively well contained, particularly at northern part of the site.

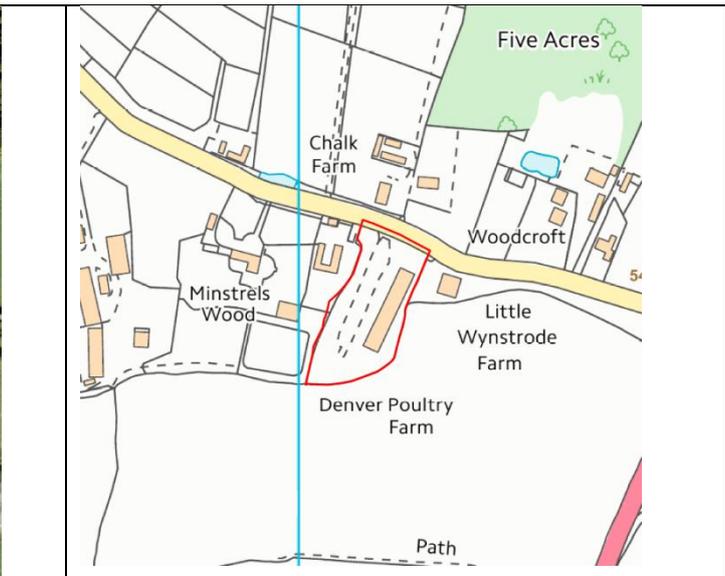
Summary of Main consultation responses	There were three statutory comments on this from Billingshurst Parish Council and WSCC and the Environment Agency. The main issues related to the accessibility of the site, particularly for pedestrians that would be without a footpath to the village and vehicular visibility that was considered to be poor to the north.
Recommendation	The site now has a certificate of lawful development for two residential dwellings and an office building (DC/17/0729) and the owner has confirmed that the site is no longer available for GTTS use. As such the site has been removed from the document.

Deer Park Farm, Hampers Lane, Horsham (Forest)	
	
Site Location and Size	This site is located approximately 0.5 km to the east of Horsham. The site is approximately 0.51ha.
Neighbouring uses	Woodland and pasture
Proximity to services and facilities	Horsham is classified as the Main Town in District by policy 3 of the HDPF (Strategic Policy: Development Hierarchy) and is the focus for new development in the District. The site is therefore close to a wide range of services and facilities.
Access	The site is accessed from Hampers Lane.
Planning History	The existing site contains one permanent pitch (one static caravan and one touring caravan) that was allowed on appeal (see reference DC/10/1974) in 2014. The site is owned privately and has not been put forward as part of the 'Calls for Sites' exercise. The site has also been visited twice in the winter of 2016/17, but the owners were not available.
Environmental Considerations	<p>The site is situated in the High Weald Area of Outstanding Natural Beauty (AONB). Hampers Lane is a historic route way shown on the earliest comprehensive maps (Ordnance Surveyors Draft 1800) and the High Weald AONB Management Plan seeks to maintain the historic pattern and features and ecological function of route ways (Objectives R1 and R2). Any physical alterations to this route way to accommodate additional traffic is likely to have a significant impact on this character component of the AONB. The site itself was part of St Leonards Park and is described in the Historic Landscape Characterisation as 'regular piecemeal enclosure' probably enclosed post 1845.</p> <p>The site is also located within the non-designated heritage asset of St Leonard's Park and is contained within setting of the Listed Building Leonard's Park House. The Inspectors report, in allowing the pitch in 2014, confirmed that there would be some detriment to the character and quality of the AONB caused by</p>

	the development, although it was also concluded that it would cause harm no harm to the setting of the listed building at St Leonard's Park House or the non-designated heritage asset of St Leonard's Park. The intensification of the site with further development is therefore likely to cause further detrimental harm to the character and appearance of the High Weald AONB.
Summary of Consultation responses	One comment was received on this site from the high weald AONB unit. They have suggested amendments to the description of this site which have now been incorporated.
Recommendation	It is considered that the site is not suitable for expansion or intensification due to impacts on the rural character (including the High Weald AONB) and the lack of deliverability of the site.

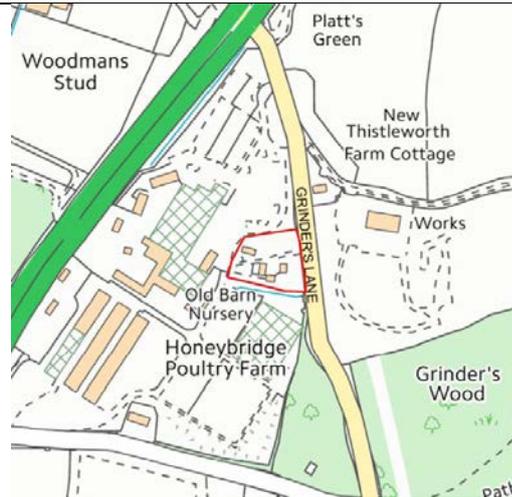
The description of the site should include the following additional information.

Denver Storage, Okehurst Lane, Billingshurst

	
<p>Site Location and Size</p>	<p>This site is located approximately 1.3 km north of the settlement of Billingshurst. The site area is 0.78 Ha.</p>
<p>Neighbouring uses</p>	<p>Land to the south and east is in agricultural use. A small number of residential properties adjoin the site to the west and north of Okehurst Lane.</p>
<p>Proximity to services and facilities</p>	<p>The site is 1.3km north of Billingshurst. Billingshurst is classified as a 'small town and larger village' within policy 3 of the HDPF (Strategic Policy: Development Hierarchy) and contains educational, health and community facilities. The site is relatively close to those facilities but will still be reliant on the private car to access these services and facilities.</p>
<p>Access</p>	<p>The site is accessed from Okehurst Lane, which adjoins the A29 to the east.</p>
<p>Planning History</p>	<p>This site was the only Gypsy and Traveller site submitted to the Council through the 'Call for Sites' exercise undertaken in the Spring of 2016. There has been a recent appeal (APP/Z3825/W/16/3151676) for the demolition of the existing storage building and the erection of 2 detached dwellings, dismissed in November 2016. The main reasons cited for this decision, was that the residential development would be located away from any existing settlement and not be essential to its countryside location. A current planning application (DC/17/0081) has been submitted to the LPA for eight permanent Gypsy and Traveller pitches but at the time of writing, has not been determined.</p>

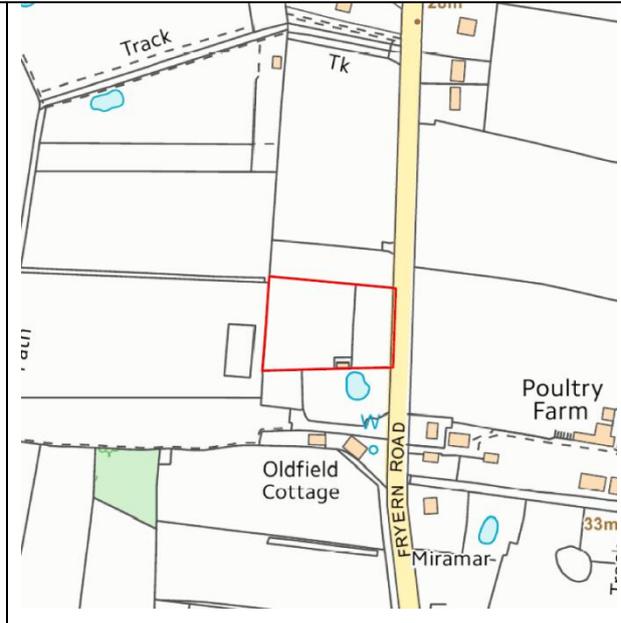
Environmental Considerations	The site is in part brownfield and contains a storage building (B8 Use Class) and would therefore be the redevelopment of previously used land. There is potential for impact on the rural character of the area, if not effectively screened or landscaped, the intensification of site could cause harm in this respect. This site could also cause adverse impacts to neighbour on grounds of proximity and intensification of the use. Minstrel's wood to the west of the site is a Grade II listed building and the proposal could also harm the setting of this property.
Summary of Consultation Responses	One comment was submitted in relation to this site, which stated that the site was considered to perform better in sustainability terms than the site at Parsons field, and would be a better site for allocation than the site (Parson's Field) which had been proposed. The SA has been updated in response to this consultation and has taken these comments into consideration.
Recommendation	It is considered that the site is not suitable for the allocation of eight permanent pitches at the current time given the potential impacts on rural character, the impact on historic buildings and the amenity of existing residents. The outcome of the current planning application together with any subsequent appeal will however be considered going forward.

Oaklands, Honeybridge Lane, Dial Post, West Grinstead



<p>Site Location and Size</p>	<p>This site is privately owned and is located to the west of Grinders Lane in a rural location to the east of the A24. The site is limited in terms of its scale at approximately 0.3ha.</p>
<p>Neighbouring uses</p>	<p>The site is bounded by the Old Barn Nurseries to the north, south and west and by Grinders Lane to the east.</p>
<p>Proximity to services and facilities</p>	<p>Dial Post is considered an 'unclassified settlement' in policy 3 of the HDPF (Strategic Policy: Development Hierarchy) that is defined as a 'settlement with few or no facilities or social networks and limited accessibility, that are reliant on other villages and towns to meet the needs of residence.' Such settlements are considered to be least sustainable in the development hierarchy and the occupiers of the site would be heavily reliant upon private motor vehicles.</p>
<p>Access</p>	<p>The site is accessed from Grinders Lane to the east of the site.</p>
<p>Planning History</p>	<p>The existing site is authorised for four pitches. An original personal occupancy condition was removed in 2014 and an additional pitch was permitted in 2015 (DC/15/1145). The implementation of this additional pitch has not yet taken place</p>
<p>Environmental Considerations</p>	<p>There are no specific environmental constraints on the site.</p>
<p>Summary of Consultation Responses</p>	<p>Four comments were received in relation to this site. Storrington PC noted that the site is outside the BUAB and should not be expanded. Three comments from the public suggested no additional gypsy sites were required in Storrington</p>
<p>Recommendation</p>	<p>The approved additional pitch is considered to be the last potential space on site to construct a new pitch and therefore, it is not considered that there is any further capacity to intensify the use of the site. It is considered that the site is not suitable for expansion or intensification.</p>

Oldfield Stables, Fryern Road, Storrington



Site Location and Size

The site is privately owned and is located a short distance (0.3km) north of the Built-up Area Boundary (BUAB) of Storrington. The site area is 0.69ha.

Neighbouring uses

Agricultural

Proximity to services and facilities

Storrington and Sullington, is categorised as a 'small town and larger village' within policy 3 of the Horsham District Planning Framework (HDPF) (Strategic Policy: Development Hierarchy). Therefore, the site is considered to be in a relatively sustainable location, with access to both health services and education.

Access

The site is accessed from Fryern Road to the east of the site.

Planning History

The site contains three authorised pitches that were allowed on appeal⁶ and were being implemented at the time of the last site visit in January 2017. The owner of the site has indicated that they would wish to retain this site for family members only. Expansion of the site would therefore be unlikely to be deliverable.

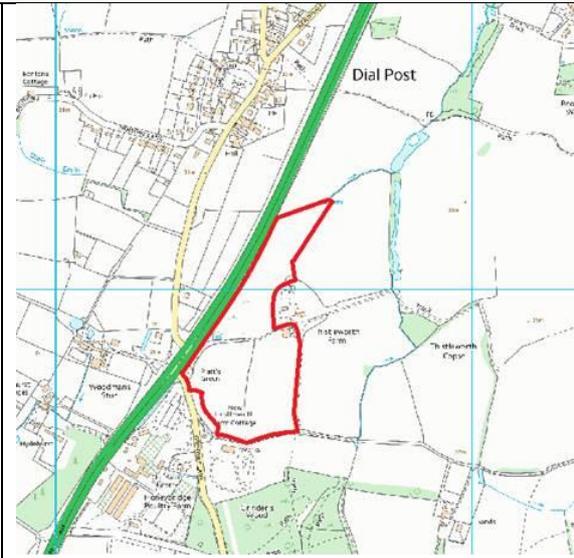
Environmental Considerations

For the planning appeal on this site it was considered that whilst there would be some limited harm to the character and appearance of this part of Fryern Road, it was considered that the proposal would not have an unacceptable impact on the character and appearance of the landscape. Any intensification of site further may have a more detrimental impact upon the landscape.

⁶ The first appeal (see reference APP/Z3825/A/13/2206172) granted planning permission for the stationing of one residential mobile home in 2014, whilst the most recent appeal (see reference APP/Z3825/W/16/3150594) was allowed also and granted planning permission for siting of two additional mobile homes in February 2017.

Summary of Consultation Responses	Four public comments were received in relation to this site, with the main concerns being in relation to access and the rural nature of the site.
Recommendation	It is considered that the site may be suitable for expansion or intensification, but that the deliverability of the site would be in doubt, particularly in the short-term. The site is therefore not considered suitable for allocation at this time.

Sussex Showground, Grinders Lane, Dial Post, West Grinstead



<p>Site Location and Size</p>	<p>This site comprises three separate fields located to the east of the A24 dual carriageway and to the north Grinders Lane and the Old Barn Nurseries. The nearest settlement to the site is Dial Post that is located approximately 0.5 km to the northwest of the access to the site. The site area is 8.8 ha.</p>
<p>Neighbouring uses</p>	<p>The majority of the site is adjacent to the A24 dual carriageway to the west. Old Barn nurseries is located to the south with agricultural land to the north and east. Thistleworth Farmhouse is located to the northeast of the proposed land.</p>
<p>Proximity to services and facilities</p>	<p>Dial Post is considered an ‘unclassified settlement’ in policy 3 of the HDPF (Strategic Policy: Development Hierarchy) that is defined as a ‘settlement with few or no facilities or social networks and limited accessibility, that are reliant on other villages and towns to meet the needs of residence.’ Such settlements are considered to be least sustainable in the development hierarchy and the occupiers of the site would be heavily reliant upon private motor vehicles.</p>
<p>Access</p>	<p>The vehicular access into the site becomes narrow heading north-eastwards along the land. The access at Grinders Lane is however wide, with further space to widen if necessary. This access road is designated as a Public Right of Way (PRoW).</p>
<p>Planning History</p>	<p>This Sussex Showground site has been put forward by a private landowner, for 15 or more pitches.</p>

Environmental Considerations	The nearest residential property to the site is Thistleworth Farmhouse that is located to the northeast of the proposed land and is a Grade II Listed Building. The setting of this listed building could easily be impacted if pitches were to be located in the eastern most field. Bunds would be required to mitigate noise issues relating to the busy dual carriageway. The site is also very open and would have significant impacts on the landscape.
Summary of Consultation Responses	
Recommendation	It is considered that the site is not suitable for the allocation of Gypsy and Traveller pitches due to its rural location, impact upon the character of the area and potentially the setting of a Listed Building (Thistleworth Farmhouse). It is similarly noted that noise levels from the A24 and the vehicular access through the site would require mitigation and/or improvement. This would require substantial infrastructure/landscape works, which means that the site would not be deliverable in the shorter term.

Sussex Topiary, Naldretts Lane, Rudgwick



Site Location and Size

This site is located in a relatively rural location to the south of Naldretts Lane and is approximately 0.95km to the south Bucks Green and 1.7km to the south of Rudgwick. The site area is 3.38ha.

Neighbouring uses

Agricultural

Proximity to services and facilities

Rudgwick is classified as a 'medium village' for policy 3 of the HDPF (Strategic Policy: Development Hierarchy). The settlement does contain educational facilities and community facilities and it is therefore regarded as a reasonably sustainable location, although there would be some reliance on the private motor car to larger settlements.

Access

The site is accessed from Naldretts Lane. The recent planning appeal indicated that vehicular access would be satisfactory and the existing highway network is adequate to serve the site. It is noted that if the use was to intensify, this stance would need to be reviewed.

Planning History

This site was the subject of a recent planning appeal (see reference APP/Z3825/A/14/22205910) for the use of the land for the stationing of caravans for residential purposes for four gypsy and traveller pitches, along with the formation of hardstanding and four utility/day rooms ancillary to that use, which was allowed in February 2016. Works on this site have now commenced. The owner of the site has stated that only the extended family would occupy the site at the current time, and there was no requirement within the family for any further

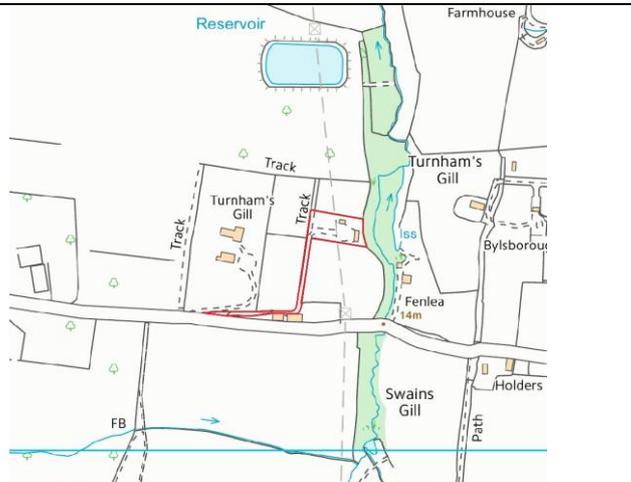
	pitches beyond the four that have already been approved.
Environmental Considerations	Although the site was broadly considered as sustainable by the Inspector, it was noted that in this countryside location would cause some limited harm to the character and appearance of the area. It should be noted that the appeal was determined on the basis of previous local policies within the District and not on the most recently adopted HDPF.
Summary of Consultation Responses	No site specific comments were made in relation to this site
Recommendation	It is considered that although site may be suitable for expansion or intensification, the deliverability of further pitches would unlikely given that the owner would currently only wish to accommodate family members.

Whiteoaks Shoreham Road Small Dole Henfield	
	
Site Location and Size	The site is in a rural location approximately 0.6km to the north of the village of Small Dole. The site comprises an area of land approximately 130m back from Shoreham Road and is around 0.4ha in size.
Neighbouring uses	The site lies in a countryside location, but located behind a ribbon development of residential properties with warehouse and light industrial uses in close proximity. Three residential properties lie close to the site, 'Sunnydene' is 130m to the east, 'Bechens' 115m to the south east and the host property 'Whiteoaks' (yet to be rebuilt) 80m to the east. The remainder of the surroundings are pasture/ grassland.
Proximity to services and facilities	The site is located 0.6km to the north of the Built-up Area Boundary (BUAB) of Small Dole. Small Dole is classified as a 'smaller village' within policy 3 of the HDPF (Strategic Policy: Development Hierarchy), which has some limited services. The occupiers of the site would be reliant upon the larger settlements of both Upper Beeding and Henfield for their educational and community needs.
Access	Vehicular access into the site runs past Whiteoaks to the south. Another vehicular access is available to the north, serving a group of storage buildings that are part of the northern residential property 'Sunnydene'.
Planning History	The land has been subject to several planning applications in recent years, the latest of which was for a settled gypsy accommodation site which was refused (DC/17/1375) on the grounds that it would be in an unsustainable location remote from services and facilities.
Environmental Considerations	There are no environmental designations on the site although there is a TPO and land at risk from flooding to the south of the site.
Summary of Consultation Responses	This is a new site and as such has not been consulted on previously (other than as part of the

	planning application process).
Recommendation	Following the outcome of the recent planning application. It is considered that the site is not suitable for the allocation of Gypsy and Traveller pitches due to its rural location.

Hawthorns, Bar Lane, Copsale	
	
Site Location and Size	The 0.30ha site is in a rural location approximately 2.9km by road to the south of Southwater.
Neighbouring uses	The site lies in a countryside location and is occupied by an agricultural barn and grazing land. The site is bound to the west by Bar Lane.
Proximity to services and facilities	The site is located 2.9km away (by road) to the southern edge of the Built-up Area Boundary (BUAB) of Southwater. Southwater is classified as a 'small town and larger village' within policy 3 of the HDPF (Strategic Policy: Development Hierarchy), meaning the site is in reasonable proximity to a range of services and facilities, albeit that there will be some reliance on the private car.
Access	There is an existing track access into the site from Bar Lane.
Planning History	The land has been subject to several planning applications in recent years, the latest of which is for 6 gypsy pitches (DC/17/2216). This application is yet to be determined.
Environmental Considerations	The application site boundary abuts both Ancient Woodland and a Site of Nature Conservation Importance (SNCI) at the southeast corner. The application site includes a small section of land at the northeast corner of the site that is within Flood Risk Zones 2 and 3.
Summary of Main Consultation Responses	This is a new site was not consulted on in the April 2017 consultation. (Although consultation comments on the site have been made though the ongoing planning application

	process).
Recommendation	<p>The site is located 2.9km away (by road) to the settlement of Southwater, however the main retail facilities and community facilities in Lintot Square, would be 4.4 km away and the school approximately 4.7 km away via road. Consequently the provision of GTTS in this location would necessitate a reliance on private car use and would be unsustainable. Development is also likely to have a detrimental impact on the character and appearance of the surrounding landscape. As such it is considered that the site is not suitable for the allocation of Gypsy and Traveller pitches within this document.</p>

Pear Tree Farm, Furners Lane, Henfield	
	
<p>Site Location and Size</p>	<p>The site is in a rural location approximately 1km to the east of Henfield. The site is approximately 0.2ha in size.</p>
<p>Neighbouring uses</p>	<p>The site lies in a countryside location and is occupied by two timber stable buildings. The southern boundary of the site extends along Furners Lane and the eastern edge of the site extends into an area of Ancient Woodland, and 142m to the east is a Grade II listed building Little Bylsborough. The nearest residential property Turnham's Gill is some 80m to the west of the site.</p>
<p>Proximity to services and facilities</p>	<p>The site is located 1km to the east of the Built-up Area Boundary (BUAB) of Henfield. Henfield is classified as a 'small town and larger village' within policy 3 of the HDPF (Strategic Policy: Development Hierarchy), meaning the site is in reasonable proximity to a range of services and facilities, albeit that there will be some reliance on the private car.</p>
<p>Access</p>	<p>The site would be accessed from an existing vehicular access off Furners Lane which currently serves the property and the 'host' site Pear Tree Farm. This access lies off a privately maintained single-track lane with occasional passing places formed by field and property entrances.</p>
<p>Planning History</p>	<p>The land has been subject to several planning applications in recent years, the latest of which was for 3 gypsy pitches and associated utility building which was refused (DC/17/1374) on the grounds that it would be in an unsustainable location remote from services and facilities and would have poor quality access.</p>

Environmental Considerations	A grade II listed building 'Little Bylsborough' is sited some 132m to the east of the application site. However, owing to the intervening band of trees, some 30m wide, and other landscaping features, there would be a limited direct visual link between the application site and the listed property.
Summary of Main Consultation Responses	This is a new site was not consulted on in the April 2017 consultation. (Although consultation comments on the site have been made though the planning application process).
Recommendation	Following the outcome of the recent planning application. It is considered that the site is not suitable for the allocation of Gypsy and Traveller pitches due to its rural location and poor quality access for sustainable transport modes.

The Spoons, Harbolets Road, West Chiltington

	
<p>Site Location and Size</p>	<p>The 0.095ha site is in a rural location approximately 4.6km to the north-east of West Chiltington.</p>
<p>Neighbouring uses</p>	<p>The site is in open countryside bound to the east by Harbolets Lane. There are a couple of residential properties close to the site, the nearest being Hazelwood 0.04km away. The site is bound on all sides by a post and rail fence.</p>
<p>Proximity to services and facilities</p>	<p>The site is over 5km away (by road) from the village of West Chiltington. Whilst it is classified as 'medium village' within policy 3 of the HDPF (Strategic Policy: Development Hierarchy), the site is very isolated and any occupiers would be reliant on private car use to access services and facilities.</p>
<p>Access</p>	<p>There are shared access tracks running along the north and southern side of the site. The southern track also serves the large residential property Harbolets while the northern track serves neighbouring properties Blackberry Cottage and South Goringlee Farm.</p>
<p>Planning History</p>	<p>The land has been subject to several planning applications in recent years, the latest of which was for the stationing of one gypsy caravan together with hardstanding and a utility/ dayroom (DC/17/0865). This application was refused on the grounds of accessibility and detriment to the rural character of the area.</p>
<p>Environmental Considerations</p>	<p>The site is in an isolated rural location and any development is likely to have a detrimental impact on the rural character of the area.</p>

Summary of Main Consultation Responses	This is a new site was not consulted on in the April 2017 consultation. (Although consultation comments on the site have been made though the planning application process).
Recommendation	It is considered that the site is not suitable for the allocation of a Gypsy and Traveller pitches due to its rural location and poor quality access to services and facilities.

10.0 CONCLUSIONS AND NEXT STEPS

10.1 As set out in Part B of this document, the overall need for Gypsy and Traveller pitches in the Horsham District equates to 86 pitches over the next 15 years. This includes the *existing need* of 44 pitches which have been identified as the ‘backlog’ of existing unauthorised sites and personal or temporary planning permissions. In addition, there is also a *future need* of 42 pitches over the next 15 year period which is to be identified. As such there is a requirement for new pitches within the District in order for the Council to meet its required Gypsy accommodation needs.

10.2 A number of sites have been considered as part of this process and the sites which are considered to have the greatest prospect of contributing to meeting Gypsy and Traveller sites at this stage are set out in the table below. In addition, land at Southside, Honeybridge Lane in Dial Post, may also have potential for allocation for Travelling Showpeople, should the need for this community be confirmed.

Site	Nature of Site	Potential number of additional pitches
Smithers Rough, Guildford Road, Rudgwick	Access can be achieved (in discussions with WSCC) and further work on layout indicates the site could support 15 pitches. Site identified in April 2017 for 10-12 pitches.	15 pitches
Greenacres, Hillside Lane, Small Dole, Upper Beeding	Existing unauthorised site – allocated under policy 21 of the HDPF. Site identified in April 2017 for 12 pitches.	12 pitches
Greenfield Farm, Valewood Lane, Barns Green, Itchingfield	Existing site. Pitches have personal occupancy conditions. It is proposed these are converted to ‘full’ Gypsy and Traveller pitches. One unauthorised pitch on the site has now been granted permission. Site identified in April 2017 for 6 pitches.	5 pitches
Kingfisher Farm, West Chilmington Lane, Itchingfield	Existing site with unauthorised pitches. (It is noted this site is subject to an ongoing appeal). Site identified in April 2017 for 11 pitches.	11 pitches

Lane Top, Nutbourne, Pulborough	Three existing pitches have personal occupancy conditions. Allocated under policy 21 of the HDPF. . Site identified in April 2017 for 3 pitches.	3 pitches
Northside Farm, Burnthouse Lane, Rusper	Three pitches with personal occupancy conditions. It is proposed these are converted to 'full' Gypsy and Traveller pitches. Site identified in April 2017 for 3 pitches.	3 pitches
Oakdene, Blackgate Lane, Codmore Hill, Pulborough	Four pitches under personal occupancy conditions. It is proposed these are converted to 'full' Gypsy and Traveller pitches. In addition it is considered the site could support an additional three new pitches. Site identified in April 2017 for 7 pitches.	7 pitches
Southview, The Haven, Slinfold	Existing site with unauthorised pitches. Allocated under policy 21 of HDPF. Site identified in April 2017 for 4 pitches.	4 pitches
Bromeliad Nursery	New site with potential for 15 pitches.	15 pitches
TOTAL		75 pitches

9.3 The process has identified 75 pitches for use as Gypsy and Traveller accommodation. This is more than sufficient to meet the Districts Gypsy and Traveller accommodation requirements of 68 pitches for the next 10 years . The total requirement for the 15 year period to 2032 is 86 pitches, meaning a further 11 pitches will need to be identified.

Next Steps

9.3 This document is published for a six week period of consultation in accordance with regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012. It should be noted that at this stage, **these proposals are solely for consultation and do not form Council policy.**

9.4 The Council is seeking views from stakeholders and the general public on the findings from the assessment of needs and the site assessments and what changes they would wish to see before the next stage of consultation.

- 9.5 The six week consultation will commence on **Friday 1 December 2017 and run until 5.00pm on Friday 26 January 2018**. Comments can be submitted online, via the council's website <https://www.horsham.gov.uk/planningpolicy/planning-policy/current-consultations> by email to strategic.planning@horsham.gov.uk or by post to

Horsham District Council
Parkside
North Street
Horsham,
West Sussex
RH12 1RL

- 9.6 Representations that are submitted to the Council will be summarised and suggested changes will be considered by the Council. This could include evidence updates or further work on proposed sites or consideration of new land that could be proposed to the Council as part of the consultation.
- 9.7 The comments made on this document will be incorporated into a Proposed Submission document, which will need to be agreed by the Council for a six week consultation period under Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012. After this consultation period, comments made will be submitted to the Planning Inspectorate together with the draft plan and any proposed modifications for independent examination. It is currently anticipated that the Proposed Submission consultation will be held in late spring of 2018, with the Examination of the plan in autumn 2018. It is currently envisaged that the document would be adopted in late 2018 or early 2019 depending on the timescale in which the Planning Inspectorate submit their report to the Council.

APPENDIX 1 – IDENTIFICATION OF GYPSY AND TRAVELLER NEEDS

A1.1 The methodology used to assess Gypsy, Traveller and Travelling Showpeople (GTTS) accommodation needs has involved the following steps:

- **Historical data collection and desktop analysis**

This initial stage of the assessment looked at existing data such as population size, a review of existing Gypsy and Traveller and Travelling showpeople sites in the District and a review of planning applications, appeals and enforcement data. This information was used to identify the existing need for Gypsy, Traveller and Travelling Show people in the District.

- **Predicting future needs in the next 15 years**

This stage of the assessment examined how many new Gypsy, Traveller and Travelling Showpeople sites would be needed in the next 15 years. This number was identified through questionnaires and visits to existing Gypsies, Travellers and Travelling Showpeople in the District. Where families could not be contacted a standard formula for predicting future needs was applied.

Historical Data Collection and Desktop Analysis

A1.2 In terms of assessing historical data for the Horsham District's GTTS population, a number of data and information sources were used to gain a wider understanding of the Gypsy and Traveller accommodation demands. These sources are outlined below:

- Population size and movement of travellers;
- Waiting Lists for Public Sites;
- A review of existing Gypsy, Traveller and Travelling Showpeople sites within the District;
- Planning application data for the previous five years, including live applications and appeals;
- Biannual Gypsy and Traveller caravan counts data since 2010 that have been detailed in the Council's Authority Monitoring Reports (AMR);
- Data from other organisations on the number of families and individuals within GTTS community (notably including the 2011 Census);
- Information from the HDC Housing Register; and

- Up-to-date positions regarding planning applications, appeals and outcomes, or enforcement action.

Predicting Future needs

Initial GTTS Questionnaires and Interviews with the Community

- A1.3 The initial traveller questionnaire (see Appendix 2) was designed and based on a questionnaire agreed across authorities in Sussex and, Surrey. It was sent to 82 addresses at 16 existing sites, which included authorised and unauthorised sites. In addition, planning agents who have put forward sites to the LPA as part of the 'Call for Sites' process have, in some cases, provided completed questionnaires from the prospective occupants.
- A1.4 Following the distribution of questionnaires to known addresses across the district, the Council then undertook face-to-face visits to existing Gypsy and Traveller sites across the District, including to five sites that were described as inaccessible. This was to encourage as many participants as possible. The questionnaires focused on the accommodation needs of Gypsy and Travellers and the storage of equipment and need for employment space for travelling Showpeople.
- A1.5 To facilitate further participation in this assessment, the assessment will remain live and open to additional interview data up to the completion of the submission Site Allocations of Land DPD.

RESULTS OF ASSESSMENT

Historical Data Collection and Desktop Analysis

- A1.6 This section of the report analyses the existing available data in order to present what is already known about Gypsies, Travellers and Travelling Showpeople (GTTS) within the Horsham district. The Council has endeavoured to establish links with the GTTS community over a number of years. Members of the GTTS communities liaise with specific officers from the Council's Planning, Property, Housing, Legal and Environmental Health teams. Consequently, the Council has, over the years, collected a substantive amount of data regarding the movements and needs of travelling community within the District.

Population Size, Census and Gypsy and Traveller counts

A1.7 The 2011 Census confirmed that the number of individuals who identify themselves as 'White Gypsy or Irish Traveller' living within the Horsham District is 234, or 0.2% of the total population of the District, which is in line with the rest of the South East of England. The 2011 Census also confirms the geographical spread of known Gypsies and Travellers within the District. The table below illustrates the number of people who identify themselves as 'White Gypsy or Irish Traveller' within each Parish. Some caution should be taken with this data as it is noted that each Parish has been aggregated and in fact the totals of the Parishes does not meet 234 figure identified for the District as a whole. Parishes partially or wholly within the South Downs National Park (SDNP) have also been identified as such in the table. The SDNP is its own Local Planning Authority (LPA), so any accommodation need arising from such communities in the SDNP would be assessed through their own accommodation needs assessment.

Table A1: Parishes and Location of Gypsies and Travellers within the Horsham District (Census 2011)

Parish	Gypsy and Traveller No. (Census 2011)
Amberley (Fully within SDNP)	1
Ashington	1
Ashurst	0
Billingshurst	26
Bramber (partially within SDNP)	0
Broadbridge Heath	0
Coldwaltham (wholly within SDNP)	2
Colgate	6
Cowfold	0
Henfield (small section of Parish within SDNP)	12
Itchingfield	11
Lower Beeding	1
North Horsham	11
Nuthurst	2

Parham (wholly within SDNP)	1
Pulborough (small section of Parish within SDNP)	9
Rudgwick	11
Rusper	1
Shermanbury	0
Shipley	0
Slinfold	22
Southwater	18
Steyning (partially within SDNP)	12
Storrington and Sullington (partially within SDNP)	25
Thakeham	0
Upper Beeding (partially within SDNP)	9
Warnham	0
Washington (partially within SDNP)	3
West Chiltington	3
West Grinstead	9
Wiston (partially within SDNP)	0
Woodmancote (small section of Parish within SDNP)	0

A1.8 It is noted from the table above that the main concentrations of the District's Gypsy and Traveller population are located within the Parishes of Billingshurst, Slinfold, and Storrington and Sullington with estimates of over 20 people identifying themselves as Gypsies and Travellers. In general, the existing permanent GTTS sites are located along the main road arteries running from north to south through the District, namely along the A29 (Stane Street), A24 and A281.

A1.9 Whilst the bi-annual caravan count does provide a snapshot of the scale and distribution of the travelling community within Horsham District, it is noted that these counts, which are reported within the Council's Authority Monitoring Reports (AMR) each year, can vary in terms of both scale and distribution. Below is a table that assembles data since July 2010 for the caravan counts, which includes both authorised and unauthorised caravans. It should be noted that the counts only include occupied units and not unoccupied units.

Table A2: Caravan Count Data since 2010 across accommodation types in Horsham District

Note – this figure includes residential and transit caravans on all sites

	Authorised Sites (i.e. those sites with planning permission)				Unauthorised Sites (without planning permission)				Overall Total
Count Date	Socially Rented	Private Caravans	Total		Caravans on land owned by GTTS	Caravans on land not owned by GTTS	Total		
July 2010	43	24	67		27	0	27		94
July 2011	34	21	55		28	0	28		83
July 2012	42	18	60		25	24	49		109
July 2013	37	32	69		29	1	30		99
July 2014	33	31	64		28	3	31		95
July 2015	44	36	80		31	13	44		124
July 2016	40	65	105		30	20	50		155
Count Date	Socially Rented	Private Caravans	Total		Caravans on land owned by GTTS	Temporary encampments			
July 2017	48	39	87		58	10	68		155

A1.10 In summary, the caravan counts show that socially rented authorised sites have remained relatively static in terms of numbers. This is not surprising, as no new sites have been brought forward by WSCC or HDC within the Horsham District Council administrative area, in this period. Similarly, unauthorised caravans on land owned by the GTTS community have also remained relatively static, which potentially indicates that suitable land in the District for this type of use is limited and/or prohibitively expensive. In terms of unauthorised caravans on land not owned by GTTS, this has also been relatively limited with the exception of July 2012, where two New Age Traveller sites arrived in the District.

A1.11 It is noted that the overall number of both authorised and unauthorised caravans has increased from a relatively stable 90 to 110 caravans between 2010 and 2014 to 155 caravans in July 2016. This was largely due to an unauthorised incursion onto the Kingfisher Farm, West Chiltington Lane, Itchingfield during this period, where approximately 30 caravans were stationed at the site. Planning permission for 11 pitches at Kingfisher Farm (see reference DC/10/1041) was allowed on appeal in 2011, but the permission was not implemented in accordance with the necessary conditions or approved plans. Horsham District Council successfully obtained an injunction in the High Court (May, 2016) to deal with a breach of planning control at Kingfisher Farm. The site is subject to a breach of condition appeal and is discussed in detail in Part C of this document.

Waiting Lists for Existing Public Sites

A1.12 Within the Horsham District, there are three publically owned sites of which two (Adversane and Cousins Copse) are owned by West Sussex County Council (WSCC) and each have 12 pitches. A third site to the south of Small Dole, named Hillside Park, Hillside Lane, Small Dole is owned and managed by Horsham District Council (HDC) and similarly has 12 authorised pitches. This gives a total of 36 publically owned pitches.

A1.13 The two sites that are owned by WSCC are no longer managed by them and have been let on a long lease with management agreement to the Home Space Sustainable Accommodation CIC. The management agency have indicated that since they took over management of the two sites in October 2014, there have been 71 applications from gypsies and travellers (as of November 2016) for accommodation, with the majority of the applications coming from West Sussex. It was stated that there were also applications from Worcestershire, Cambridgeshire, Surrey, Croydon, East Sussex, Hampshire, Essex and

Kent, so it is suggested that a number of these applications were speculative. However, it was noted that there had only been two departures in over 2 years at the sites, so it is relatively clear that these sites are fully occupied and that there is demand for those sites.

A1.14 In terms of Horsham District Council's own site at Hillside Park, this was brought under Compulsory Purchase Order (CPO) powers in 1978 and has been used for Gypsy and Traveller site provision ever since. Although there is no formal waiting list for the site, the Council do received requests from occupiers of the adjacent site (known as Greenacres) on occasion to be accommodated on the site and these are considered on their own merits when pitches are vacated.

A1.15 In assessing the needs for Gypsy and Traveller accommodation, the Council has considered whether there are any Gypsies, Travellers or Travelling Showpeople (GTTS) on the housing waiting list. In terms of the housing register process, it is noted that there was at least 659 households on the housing waiting list as at 1 March 2017, but there is no formal data available regarding the movement of travellers to and from permanent housing.

The Planning Position on Private Gypsy and Traveller Sites in the Horsham District

A1.16 As discussed above, the publically owned Gypsy and Traveller sites include the provision of 36 pitches that have planning permission and are almost fully occupied. However, the majority of Gypsies and Travellers within the District are located on private sites, both authorised and unauthorised. A list of these private sites and the current planning position as at March 2017 is described below. **It should be noted that any GTTS site with either a temporary planning permission or a personal occupancy condition cannot be counted towards the identified need of the District.**

Table A3: The Planning Position for Existing Private Gypsy and Traveller Sites in the Horsham District

Site Address	Approved Planning Permissions and the No. of Approved Pitches	Current Planning Applications and Appeals	Existing Allocations in HDPF	Backlog (<i>comprising unauthorised pitches; those with personal occupancy or temporary permission</i>)
Lane Top, Nutbourne, Pulborough	3 pitches have been authorised through planning permissions DC/04/2554 and DC/10/0586. However, both planning permissions had personal occupancy conditions attached.	None	The site was allocated under Policy 21 of the HDPF for three pitches, although no planning application has come forward to authorise the site.	It is considered that 3 pitches are still in backlog as no planning application to lift the personal occupancy conditions has been submitted to and approved by the Council following its allocation.

Site Address	Approved Planning Permissions and the No. of Approved Pitches	Current Planning Applications and Appeals	Existing Allocations in HDPF	Backlog (<i>comprising unauthorised pitches; those with personal occupancy or temporary permission</i>)
Oakdene, Blackgate Lane, Codmore Hill, Pulborough	4 pitches have been authorised through planning permissions PL/115/99 and DC/12/2093. Two new planning applications to include the removal of personal occupancy conditions (of four pitches) and the extension of the site by 5 pitches (DC/17/2121 and DC/17/2084 respectively).	None	None	Until DC/17/2121 is determined 4 pitches are still in backlog as the personal occupancy condition(s) require that the use should cease as soon as the named person(s) no longer occupy the site and restored to its former use.
Parsons Field, Pickhurst Lane, Pulborough	2 pitches have been authorised on a temporary basis until the end of 2019 with no personal restrictions (see reference DC/16/2388).	An application to discharge conditions relating to materials, landscaping and sewerage (amongst other matters) has been lodged with the Council, but has yet to be determined.	None	It is considered that 2 pitches will be in backlog at the start of 2020 owing to the temporary planning permission.

Site Address	Approved Planning Permissions and the No. of Approved Pitches	Current Planning Applications and Appeals	Existing Allocations in HDPF	Backlog (<i>comprising unauthorised pitches; those with personal occupancy or temporary permission</i>)
Southview, The Haven, Slinfold	Only a single pitch has permanent planning permission.	None	The site is allocated for 4 pitches within Policy 21 of the HDPF in order to authorise the 4 existing pitches on the site. No planning application has yet come forward to fulfil this allocation.	It is considered that 4 pitches are in backlog, albeit that they were allocated within the HDPF. No application has yet come forward on this site.
Greenfield Farm, Valewood Lane, Barns Green, West Grinstead	14 pitches have planning permission, of which 5 pitches have personal occupancy conditions attached (see reference DC/13/2457 and DC/16/2721 for the 5 permanent pitches).	None	None	It is considered that at least 5 pitches will be in backlog owing to the personal occupancy conditions attached.

Site Address	Approved Planning Permissions and the No. of Approved Pitches	Current Planning Applications and Appeals	Existing Allocations in HDPF	Backlog (<i>comprising unauthorised pitches; those with personal occupancy or temporary permission</i>)
Northside Farm, Burnthouse Lane, Rusper	Planning permission for the stationing of 1 static caravan and 2 touring caravans (DC/14/2385). Personal occupancy condition was attached to the decision notice.	None	None	Given that personal condition has been attached to the decision notice, it is considered that the 3 pitches would form part of the backlog unless the personal occupancy condition was removed.
Deer Park Farm, Hampers Lane, Horsham	Planning permission for one static caravan and one touring caravan was allowed on appeal (DC/10/1974).	None	None	None

Site Address	Approved Planning Permissions and the No. of Approved Pitches	Current Planning Applications and Appeals	Existing Allocations in HDPF	Backlog (<i>comprising unauthorised pitches; those with personal occupancy or temporary permission</i>)
Oaklands, Honeybridge Lane, Dial Post, West Grinstead	Planning permission for 4 pitches, with at least 3 of those pitches occupied at the time of writing the report (references DC/14/0875 and DC/15/1145). There is no personal occupancy conditions attached to either planning permission.	None	None	None
Rowfold Nurseries, Coneyhurst Road, Billingshurst	None	None	The site is allocated for 10 pitches with Policy 21 of the HDPF and is in use for employment. No planning application has yet been received in connection with this site allocation.	None - 2 pitches (in the form static caravans) that occupied on the site without planning permission have been removed.

Site Address	Approved Planning Permissions and the No. of Approved Pitches	Current Planning Applications and Appeals	Existing Allocations in HDPF	Backlog (<i>comprising unauthorised pitches; those with personal occupancy or temporary permission</i>)
Oldfield Stable, Fryern Road, Storrington	There is planning permission for 3 permanent pitches, with both applications being allowed on appeal (DC/12/2345 and DC/15/2851).	None	None	None
Kingfisher Farm, West Chiltington Lane, Itchingfield	None	There was an allowed planning appeal for 11 pitches at Kingfisher Farm (DC/10/1041), but the permission was not implemented in accordance with the pre-commencement conditions or approved plans and is subject of an ongoing enforcement appeal. Additional two applications DC/17/1184 & DC/17/1185 for 25 mobile homes (Refused)	None	Given that 11 pitches were allowed on appeal, but were not implemented in accordance with the pre-commencement conditions/approved plans, it is considered that the site does not have planning permission and should be added to the existing backlog of sites.

Site Address	Approved Planning Permissions and the No. of Approved Pitches	Current Planning Applications and Appeals	Existing Allocations in HDPF	Backlog (<i>comprising unauthorised pitches; those with personal occupancy or temporary permission</i>)
Sussex Topiary, Naldretts Lane, Rudgwick	A planning appeal for 4 pitches (DC/13/2170) was allowed on 8 February 2016, but has not yet formally commenced. A discharge of conditions application was submitted (reference DISC/16/0058) recently but this was a split decision.	None	None	None, providing that the allowed appeal is adhered to full and constructed in accordance with the approved details.

Site Address	Approved Planning Permissions and the No. of Approved Pitches	Current Planning Applications and Appeals	Existing Allocations in HDPF	Backlog (<i>comprising unauthorised pitches; those with personal occupancy or temporary permission</i>)
Greenacres, Hillside Lane, Small Dole, Upper Beeding	None	None	The site was allocated for 12 pitches within Policy 21 of the HDPF (known as Land adjacent to Hillside Park, Hillside Lane, Small Dole). The site has been 'tolerated' for a number of years but continues to have 12 pitches occupied. No planning application to authorise the site has been forthcoming.	There continues to be a backlog of 12 pitches as the allocation has not received a planning application to authorise the site as of yet.
TOTAL				44

A1.17 As can be seen in the above table, although there is a high number of private gypsy and traveller sites within the District, a high percentage of these sites are not permanent sites that could count towards meeting District’s need for pitches. For example, at least 15 of the authorised pitches (at Lane Top, Oakdene, Greenfield Farm and Northside Farm) are subject to personal occupancy conditions, which require that the use should cease as soon as the named person(s) no longer occupy the site and restored to its former use. Furthermore, there are 2 pitches that are subject to temporary planning permission until the end of 2019 (at Parsons Field Stables) and further pitches that are ‘unauthorised’ but have been tolerated for a long period of time (in some cases over ten years), such as Southview and Greenacres.

Estimating the Number of Pitches in ‘Backlog’ within the Horsham District

A1.18 The findings above are similar to the 2012 GTANA. To address this matter, policy 21 of the HDPF allocated a number of sites that could simply be authorised through either the removal of personal occupancy conditions or the granting of planning permission for ‘tolerated’ sites (with the exception of Rowfold Nurseries that has only 2 occupied statics in the previous count, but was considered to have capacity for a higher number of pitches) as follows:

Table A4: Policy 21 of the HDPF – Gypsy and Traveller Site Allocations

Location	Pitches
1. Rowfold Nurseries, Coneyhurst	10
2. Southview, Five Oaks	4
3. Land adjacent Hillside Park, Small Dole	12
4. Lane Top, Pulborough	3

A1.19 Since the adoption of the HDPF in November 2015, the four sites that were allocated for a total of 29 pitches have not yet come forward through the development management process. Since April 2017 a Certificate of Lawful use has been granted on the land at Rowfold Nurseries and the land owner has confirmed that the site is no longer available of gypsy and traveller accommodation. In addition, it is not anticipated that the other allocations will come forward in the short-term. Both the site at Southview, Five Oaks and the site adjacent to Hillside Park, Small Dole (now renamed as Greenacres for the remainder of this study) are unauthorised, but tolerated sites, which have still not been

authorised. Lane Top, Pulborough has been allocated for 3 pitches, which would require the removal of a personal occupancy condition(s) that has not yet come forward. As none of these sites have been fully authorised, each pitch still counts toward the Council's existing backlog of pitches.

A1.20 Table A5 below considers the number of pitches that are considered to be in backlog, due to personal occupancy conditions, temporary planning permissions or being unauthorised. The existing allocations under Policy 21 of the HDPF are also shown, but as discussed, these have yet to come forward.

A1.21 Table A5 shows the number of authorised pitches within the District at 70, with 36 of those pitches owned by public bodies. At least 17 private authorised pitches are either tied to a personal occupancy condition or have only been granted on a temporary basis, meaning that **54 pitches with planning permission are on a permanent basis without personal occupancy conditions. A further 17 pitches have a temporary or personal occupancy condition.**

A1.22 In terms of the unauthorised sites, the two largest sites that are unauthorised are Greenacres, Hillside Lane and Kingfisher Farm, West Chiltington Lane that total 23 pitches collectively. The Greenacres site (12 pitches) has been tolerated for substantial period of time (over ten years) and adjoins the existing site owned by HDC named Hillside Park. This site was allocated for 12 pitches within the HDPF, but has yet to come forward. The Kingfisher Farm site was previously allowed on appeal for 11 pitches in 2011 (see reference DC/10/1041), but it was later found that the site had not been constructed in accordance with the approved plans (the site having approximately 30 caravans for the July 2016 count) and an enforcement notice has been served. The site is subject to an ongoing appeal, under Public Inquiry procedures, and is due to be heard in September 2017.

A1.23 The PPTS confirms at paragraph 10 that LPAs should identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their targets and identify sites for the 6-10 year period and, where possible, the 11-15 year period. The calculation for the backlog and the number attributed to the backlog should be within the next 5 year period (i.e. 2017-2022). This should also take account of any known vacancies at either public or private sites.

Table A5: The Existing Backlog of Gypsy and Traveller Pitches within the Horsham District

Overall Backlog for Gypsies and Traveller Sites in the Horsham District				
Location	No. of Fully Authorised Pitches with no personal occupancy / temporary permissions	No. of Unauthorised Pitches	No. of pitches with personal occupancy conditions or temporary planning permissions	Existing Allocation under Policy 21 of HDPF
Adversane, Stane Street, Billingshurst	12	0	0	None
Cousins Copse, The Haven, Slinfold	12	0	0	None
Deer Park Farm, Hampers Lane, Horsham	1	0	0	None
Greenacres, Hillside Lane, Small Dole, Upper Beeding	0	12	0	12 pitches
Greenfield Farm, Valewood Lane, Barns Green, West Grinstead	5	0	5 (Personal Occupancy)	None
Hillside Park, Hillside Lane, Small Dole, Upper Beeding	12	0	0	None
Kingfisher Farm, West Chiltington Lane, Itchingfield	0	11	0	None
Lane Top, Nutbourne, Pulborough	0	0	3 (Personal Occupancy)	3 pitches
Northside Farm, Burnthouse Lane, Rusper	0	0	3 (Personal Occupancy)	None
Oakdene, Blackgate Lane, Codmore Hill, Pulborough	0	0	4 (Personal Occupancy)	None
Oaklands, Honeybridge Lane, Dial Post, West Grinstead	4 (3 existing pitches, 1 extant planning pitch yet to be constructed)	0	0	None
Oldfield Stable, Fryern Road, Storrington	3	0	0	None
Parsons Field, Pickhurst Lane, Pulborough	0	0	2 (Temporary Permissions)	None

**Overall Backlog for Gypsies and Traveller Sites
in the Horsham District**

Location	No. of Fully Authorised Pitches with no personal occupancy / temporary permissions	No. of Unauthorised Pitches	No. of pitches with personal occupancy conditions or temporary planning permissions	Existing Allocation under Policy 21 of HDPF
Rowfold Nurseries, Billingshurst	0	0	0	10 pitches
Southview, The Haven, Slinfold	1	4	0	4 pitches
Sussex Topiary, Naldretts Lane, Rudgwick	4 (under construction)	0	0	None
Totals	54 pitches	27 pitches	17 pitches	29 pitches

Conclusion on the Backlog of Existing Sites

The backlog is therefore assumed be those pitches that are either unauthorised (which total 27 pitches) and those pitches that are of a temporary nature or tied to a personal occupancy condition (17 pitches), **which gives the Horsham District area a total backlog of 44 pitches**. This figure could be reduced through the development of existing allocations in the HDPF and the outcome of existing appeals (particularly in the case of Kingfisher Farm), all of the 29 unauthorised pitches identified above are either allocated within the HDPF or subject to the appeal process. It is also clear that a review of existing sites that have personal occupancy conditions could be undertaken to alleviate the backlog sites.

Predicting future needs in the next 15 years

Questionnaires and Interviews with the Gypsy and Traveller Community

- A1.24 As discussed in Part B of this assessment, the Council undertook an initial traveller questionnaire (see Appendix 2). This questionnaire was sent to 82 separate addresses at the 16 separate existing sites identified (authorised and unauthorised). In some cases, the questionnaire was only posted to the main contact for the smaller private family sites. There were only 5 addresses that were described as inaccessible and they were visited for potential face-to-face interviews.
- A1.25 In addition, two agents who have put forward sites to the LPA as part of the 'Call for Sites' process have also provided completed questionnaires from the prospective occupants. There was a single Travelling Showpeople Site submitted as part of the 'Calls for Site' process, named Land at Southside, Honeybridge Lane, Dial Post for 5 plots and this is discussed in Section 7 of this report. In terms of Gypsy and Traveller sites, a new site was put forward at Fryern Park Farm, Fryern Lane, Billingshurst that has similarly provided 5 completed questionnaires from prospective occupiers of the site.

A1.26 Whilst there was the potential for the travelling community to not wish to respond to the formal surveys, it was considered that the distribution of such questionnaires would raise awareness within the existing GTTS community regarding the accommodation needs assessment and may elicit some responses initially.

A1.27 The postal questionnaire was followed up by a programme of face to face interviews. In addition, some of the important information regarding the ages of occupants and current occupiers has already been picked up through other means, most notably through recent planning applications and knowledge of the existing sites through the biannual gypsy and traveller counts. The questionnaire was therefore partly used as basis for conducting face to face interviews to obtain any additional information from the existing community over and above the desktop data, particularly in terms of future accommodation needs.

A1.28 A number of interviews, particularly at private sites, were conducted by pre-arranged appointments, with Council Officers contacting the occupiers of the sites. However, interviews at the publically owned sites (i.e. Adversane, Cousins Copse and Hillside Park) were undertaken speculatively due to difficulties in contacting occupants to arrange interviews, with mixed results. Table A6 below outlines all the survey responses from the existing sites, including interviews.

Table A6: Survey Responses from Existing Sites in the Horsham District

Survey Responses							
Location	Ownership	Estimated No. of Households	No. of Interviews/ Questionnaires Undertaken	Interviews Conducted With	Interviews Refused	Properties Unoccupied	Current Status
Adversane, Stane Street, Billingshurst	WSCC	10	0	Not applicable	5	2	
Cousins Copse, The Haven, Slinfold	WSCC	11	4	Heads of Household	2	1	
Deer Park Farm, Hampers Lane, Horsham	Private	1	0	Not applicable	0	0	The owner was away on two occasions visited.
Greenacres, Hillside Lane, Small Dole, Upper Beeding	Private	12	2	Heads of Household	3	0	
Greenfield Farm, Viewwood Lane, Bams Green, West Grinstead	Private	10	0	To be arranged with owner of site	0	0	To be arranged with the owner of the site.
Hillside Park, Hillside Lane, Small Dole, Upper Beeding	HDC	10	1	Head of Household	4	2	
Kingfisher Farm, West Chiltington Lane, Itchingfield	Private	11	0	Not applicable	0	0	Owing to ongoing enforcement action at the site, it has been considered that interviews would be difficult to establish.
Lane Top, Nutbourne, Pulborough	Private	3	1	Head of Household	0	0	Follow up interview to be arranged with the owner of site
Northside Farm, Burnthouse Lane, Rusper	Private	3	1	Owner of site	0	0	Completed in full

Survey Responses							
Location	Ownership	Estimated No. of Households	No. of Interviews/ Questionnaires Undertaken	Interviews Conducted With	Interviews Refused	Properties Unoccupied	Current Status
Oakdene, Blackgate Lane, Codmore Hill, Pulborough	Private	4	1	Owner of site	0	0	Completed in full
Oaklands, Honeybridge Lane, Dial Post, West Grinstead	Private	3	0	Owner of site refused	1	0	
Oldfield Stable, Fryern Road, Storrington	Private	2	1	Owner of site	0	0	Completed in full
Parsons Field, Pickhurst Lane, Pulborough	Private	2	0	Not applicable	1	0	
Rowfold Nurseries, Bingshurst	Private	2	0	Not applicable	0	0	
Southview, The Haven, Slinfold	Private	5	1	Owner of site	0	0	Completed in full
Sussex Topiary, Naldretts Lane, Rudgwick	Private	4	1	Owner of site	0	0	Completed in full
Totals		93	13		16	5	

A1.29 There were 13 responses and interviews undertaken at 9 of the 16 existing sites. The private sites that were interviewed largely included extended families and the heads of each household at the private sites were able to provide the Council detailed information on the family arrangements of each of those sites in full. Therefore, the interviews and questionnaires were able to identify the family arrangements for 30 families within the District that will feed into the 15 year projection.

Identification of need through questionnaires and interviews

A1.30 Table A7 below illustrates each of the sites where children/young adults are known to be residing and when the future accommodation need may be required. There is no set age within the Planning Policy for Traveller Sites (PPTS) document as to when travellers normally leave home to set up their own households. For the previous GTANA within the District, published in 2012, the age of 18 was set in terms of when a new household is expected to form; this age will vary from family to family, but is not considered unrealistic.

Table A7: Identified Existing Gypsy and Traveller Children/Young Adults identified through Questionnaires/Interviews

Location	1-5 years – (2017-2022)	6-10 years – (2022-2027)	11-15 years – (2027-2032)
Cousins Copse, The Haven, Slinfold	0	1	2
Greenacres, Hillside Lane, Small Dole, Upper Beeding	0	3	3
Hillside Park, Hillside Lane, Small Dole, Upper Beeding	0	2	1
Lane Top, Nutbourne, Pulborough	0	0	0
Northside Farm, Burnthouse Lane, Rusper	0	0	0

Location	1-5 years – (2017-2022)	6-10 years – (2022-2027)	11-15 years – (2027-2032)
Oakdene, Blackgate Lane, Codmore Hill, Pulborough	0	1	2
Oldfield Stable, Fryern Road, Storrington	0	1	0
Parsons Field, Pickhurst Lane, Pulborough*	0	1	0
Southview, The Haven, Slinfold	0	6	3
Sussex Topiary, Naldretts Lane, Rudgwick	0	0	1
Totals	0	15	12

*This data was assembled from the most recent planning application at the site (reference DC/16/2388) that included a supporting statement (dated October 2016) where one child was on the site.

Calculation of ‘known’ future need

A1.31 In summary, it can be concluded from the 30 families identified by the LPA and for which the Council has detailed information for, that 27 children/young people on existing pitches would reach 18 years old by the end of the 15 year period in 2032. It is unlikely that all households will form and need independent accommodation within the District, as some young adults will move away from the District for work, to form families in other parts country, or to occupy bricks and mortar accommodation. In order to account for a degree of migration that may take place in practice; a ratio has been assumed as a rate of 1:0.75.

Calculation of ‘known’ Gypsy & Traveller families (Future Need):

$$27 \text{ pitches} \times 0.75 = \mathbf{20 \text{ pitches}}$$

A1.32 It is recognised that the above calculation only relates to 'known' Gypsy and Traveller families, albeit that the Council is aware that approximately 100 authorised/unauthorised existing pitches had been identified through the Gypsy and Traveller Counts and via planning application data (see Table A5 of this document). It is also known that at least 5 pitches, at the time of the July 2016 Gypsy and Traveller Count were vacant at the three publically sites owned sites. If both the known vacancies (5 pitches) and the 'known' Gypsy and Traveller family formations (30 pitches) are totalled together, this would account for 35 of the existing pitches in the District.

Calculation of 'unknown' future need

A1.33 However, for the remaining 65 pitches that have been identified through the surveys and the planning application data, it is noted that their future accommodation needs will also need to be accounted for over a 15 year projection to estimate their future accommodation needs.

A1.34 The Gypsy and Traveller Accommodation Needs Assessments: Guidance document (2007) states that information on the likely rates of household formation and assessments of future accommodation need should be based primarily on locally gathered evidence, albeit that it acknowledges that accurate projections of future needs are likely to be more difficult, particularly in the final 5 year period.

A1.35 The Council acknowledges that the remaining 65 pitches identified will similarly bring a future accommodation need; growth rates of 3% for Gypsy and Traveller families⁷ will be applied to the current pitch level, excluding those pitches that are already known and accounted for. These percentages have been applied as a compound growth rate per annum. As discussed previously, it is unlikely that all pitches will form and need independent accommodation within the District, as a percentage of young adults will move away from the District for work, to form families in other parts of the country, or to occupy bricks and mortar accommodation. In order to account for a degree of migration that may take place in practice; a ratio has been assumed as a rate of 1:0.75.

Calculation of 'unknown' Gypsy and Traveller families (Future Need):

3% of 65 pitches = 1.95

x 15 years (including compound growth each year) =
34.32

⁷ In terms of the future 'needs', the Gypsy and Traveller Accommodation Needs Assessment Guidance (2007, para 93) contends that the average growth rate of Gypsy and Traveller households nationally is approximately 3-4%.

A1.36 A short summary table is presented below that includes the shortfall, 'known' future needs and any anticipated future accommodation needs from the remaining pitches that the Council is currently unable to assess in full. The overall accommodation needs requirement is therefore estimated to be the backlog (identified as 44 pitches), 'known' future needs (20 pitches) and anticipated future needs (26 pitches). Since April 2017, a four new pitches have been fully authorised at Greenfield, Valewood Lane. This figure can therefore be subtracted from the number of pitches required in the next 5 years, leaving an outstanding requirement of 5 pitches in this period.

Table A8: Total Pitches required over the next 15 year period

Plan Period	Backlog	1-5 years – (2017-2022)	6-10 years – (2022-2027)	11-15 years – (2027-2032)
Pitches Required	44	9	19	18
New Pitches with Planning Permission since 21 April 2017	4 (subtract from 1-5 years)			
Total Pitch Requirement from Existing G & T sites	86			

APPENDIX 2 – GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE QUESTIONNAIRE

**INITIAL GYPSY, TRAVELLERS AND TRAVELLING SHOWPEOPLE
ACCOMMODATION ASSESSMENT NEEDS QUESTIONNAIRE**

Site/Address:

.....
.....

Name:

.....
.....

FOR QUESTIONNAIRES CONDUCTED ON-SITE PLEASE MARK ON THE ATTACHED SITE PLAN WHICH PITCHES/PLOTS THE RESPONDE NT RESIDES ON.

Is the Pitch Occupied: Yes () No () Don't know ()

If vacant is the occupier travelling: Yes () No () Don't know ()
Check with site manager/neighbouring pitches

When are the occupiers due back:

.....

Name of respondent:

.....
.....

Date of Interview:/...../.....

Data Protection

Your personal information will be held and used in accordance with the Data Protection Act 1998. The Council will not disclose such information to any unauthorised person or body but where appropriate will use such information in carrying out its various functions and services. No personal information relating to specific individual will be made public, and no individual will be identifiable through the description of where or how they live or their other circumstances.

INTERVIEWER'S DECLARATION

I certify that this interview was carried out according to Horsham District Council's instructions and with the MRS Code of Conduct.

SIGNATURE: _____

PRINT NAME: _____

NO: _____ DATE: _____

Q1. ETHNICITY OF RESPONDENT

Romany () Irish Traveller () Traveller () Showman () Circus People ()

New Age Traveller () Other () please state

Response not provided ()

Q2. COMPOSITION OF HOUSEHOLD

Please continue on a separate sheet if necessary

Relationship to Respondent (e.g. son, daughter, grandchild)	Gender	Year of Birth or Current Age
Respondent		

Q3. DOES THIS HOUSEHOLD OCCUPY MORE THAN ONE PITCH?

Yes () No ()

1 () 2 () 3+ () Response not provided ()

Q4. IS THE PITCH SHARED WITH ANOTHER HOUSEHOLD(S)?

1 () 2 () 3+ () Response not provided ()

Q5. DETAILS OF CURRENT ACCOMMODATION?

Local Authority site pitch/plot ()
 Privately owned site pitch/plot () i.e. Own land with planning permission
 Unauthorised development () i.e. Own land without planning permission
 Unauthorised encampment () i.e. Not own land and without planning permission
 Conventional bricks and mortar housing ()
 Side of the road ()
 Other () please state

Q6. TYPE AND SIZE OF CURRENT ACCOMMODATION?

House () 1 2 3 4 5 or more bedrooms
 Mobile Home/Chalet () 1 2 3 4 bedrooms
 Touring Caravan () 1 2 3 4 bedrooms
 Other () please state

Q7. LENGTH OF TIME AT CURRENT ADDRESS?

- Less than 1 year ()
- More than 1 year but less than 5 years ()
- More than 5 years ()
- Response not provided ()

Q8a. IF LESS THAN 1 YEAR, WHERE WERE YOU LIVING BEFORE?

Address/Site:.....
.....

Response not provided ()

Q9. ARE YOU INTENDING TO MOVE FROM THIS PITCH IN THE NEXT FIVE YEARS?

- Yes () No () Response not provided ()

Q9a. IF YES, WHERE ARE YOU THINKING OF MOVING TO?

Location:
.....
.....

Response not provided ()

Office Use Only:

Based on the response to Q9a please identify the local authority area

- Adur () Arun () Chichester () Crawley () Mid-Sussex () Worthing ()
- Surrey () Hampshire () East Sussex () Kent () Outer London () Central London ()
- Elsewhere in the South East () Elsewhere in the UK () Abroad ()

Notes:

Q10. IF YOU ARE PLANNING TO MOVE, WHAT WOULD BE YOUR PREFERRED ACCOMMODATION/TENURE?

- Affordable/Social Housing () Local Authority Pitch/Plot () Private Pitch/Plot ()
- Privately owned home () Privately rented home () Response not provided ()

Q11. ARE ANY MEMBERS OF YOUR HOUSEHOLD LIKELY TO REQUIRE THEIR OWN PITCH/PLOT IN THIS DISTRICT/BOROUGH IN THE PERIOD TO 2021 I.E THE NEXT 5 YEARS?

Household	Relationship to the Respondent	Estimated Year Required	Type of Accommodation Required*	Is the Household registered on a site waiting list or housing register**		Where is the Accommodation Required
			What is your preference?	Housing (Yes/No)	Site (Yes/No)	What is your preference?
<i>Example</i>	<i>Son and Daughter-in-law</i>	<i>2017</i>	<i>B</i>	<i>No</i>	<i>Yes</i>	
1						
2						
3						
4						
5						

Type of Accommodation:

- A. Affordable/Social Housing
- B. Local Authority Pitch/Plot
- C. Private Pitch/Plot
- D. Privately owned home
- E. Privately rented home
- F. Response not provided

Office Use Only:

Based on the response to Q11 'where is the accommodation required' please identify the local authority area

Adur () Arun () Chichester () Crawley () Mid-Sussex () Worthing ()

Surrey () Hampshire () East Sussex () Kent () Outer London () Central London () Elsewhere in the South East () Elsewhere in the UK ()
Abroad ()

Notes:

Other Questions

Q12. DO YOU HAVE ANY LAND THAT YOU WOULD LIKE TO BE CONSIDERED FOR A NEW SITE/ADDITIONAL PITCH?

Yes () No () Response not provided ()

Location/Address:.....
.....
.....

Additional Questions to Ask to Travelling Showpeople

Q13. IS THERE SUFFICIENT PROVISION AVAILABLE FOR STORAGE OF EQUIPMENT?

Yes () No () Response not provided ()

Additional Questions to Ask to Transient Gypsies and Travellers

Q14. WHERE HAVE YOU TRAVELLED FROM (LAST ACCOMMODATION)?

Location/Address:.....
.....

Response not provided ()

Q15. WHAT IS THE PURPOSE OF YOUR VISIT TO THE BOROUGH/DISTRICT? (for example visiting family or for work opportunities).

.....
.....

Response not provided ()

Q16. WHY DID YOU TAKE UP OCCUPATION OF THIS PARTICULAR SITE (unauthorised encampments)?

.....
.....

Response not provided ()

Q17. DO YOU HAVE A BASE ELSEWHERE?

Location/Address:.....
.....

Response not provided ()

Q18. HOW LONG DO YOU INTEND TO REMAIN ON THIS LAND/SITE?

.....
.....

Response not provided ()

Q19. IF YOU ARE REQUIRED TO VACATE THIS LAND/SITE, WHERE WILL YOU RELOCATE TO?

.....

Response not provided ()

Have you any comments relevant to this questionnaire or any other issues that you wish noted?

Comments:

Please continue on a separate sheet if necessary

YOUR ASSISTANCE IN ANSWERING THESE QUESTIONS IS MUCH APPRECIATED

APPENDIX 3 – GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITE ASSESSMENT PRO-FORMA
Gypsy, Traveller and Travelling Showpeople Site Assessment Pro-Forma (2016)

SHELAA reference (Not yet recorded)	
Site Address	
Size of site	Ha
Parish	
Brownfield /Greenfield Land	
Date of Survey	August / September 2016
General Site Description	
Existing Use or Previous Use if Vacant	
Development Potential (Pitches) Previously, in terms of site size, reference has been made to the 'Designing Gypsy and Traveller Sites: Good Practice Guidance' document. Although this has recently been withdrawn by the DCLG (1 September 2015), no new guidance has yet been published. It confirms that a maximum of 15 pitches 'is conducive to providing a comfortable environment which is easy to manage' and approximately 0.1 Ha would be required to allow for adequate turning space, parking provision, amenity space and the incorporation of soft landscaping.	Gross and Net Additions
SUITABILITY	

<p>Horsham District Planning Framework (HDPF), November 2015 (desk based assessment)</p>	<p>Flooding, AONB, SSSI, SNCI, SPA, TPO, Ancient Woodland, Heritage Assets, Safeguarding for Airport, Key Employment Area, BUAB etc.</p> <p>Policy 21 – Gypsy and Traveller Site Allocations</p> <p>Policy 22 – Gypsy and Traveller Sites</p> <p>Policy 23 – Gypsy and Traveller Accommodation</p> <p>The latter policy contains significant criteria in relation to A, B, C, D, E that includes flooding, drainage, ground stability, access, the installation of essential services, sustainable location and the impact upon the character and appearance of the landscape and the amenity of neighbouring properties.</p> <p>Other policies may also be relevant dependent on the intrinsic character of the site.</p>
<p>Accessibility on foot to local services (particularly schooling and essential health facilities as identified in Policy 23 (d) of the HDPF).</p>	
<p>Accessibility (distance) to public transport and road network</p> <ul style="list-style-type: none"> ➤ Road ➤ Bus ➤ Rail <p>The road network is potentially the most important transport mode to assess as the population is most likely going to drive to schools/health facilities.</p>	
<p>Physical constraints</p>	<p>Site Access – Is the site served by a safe and convenient vehicular and pedestrian access?</p> <p>Topography – Is the land level and would it lend itself to the positioning of both static and touring caravans?</p>

	<p>Existing Essential Services - This would include services such as water, power, telephony, sewerage/drainage, and waste disposal. If not, could such essential services be provided as part of the scheme?</p> <p>Ground Conditions (i.e. contamination or poor drainage)</p> <p>Flooding – Is it located within a designated flood zone and/or has the site previously been subject to historic localised flooding? Is there the potential for surface water flooding – contact Martin Brightwell</p>
<p>Environmental constraints: (some duplication with land designation / classification)</p>	<p>Landscape Constraints – Is the proposed site well screened by trees and/or would impact high landscape value area (see policy 30 of HDPF)?</p> <p>Ecological Constraints – Any known ecological constraints and/or barriers to the implementation of the development? Signs that ecology may be an issue?</p> <p>Noise Constraints – This will be a particular factor in the northeast corner of the District near to the Gatwick Airport and equally along major roads (A24 and A264)? Or adjacent uses?</p> <p>Tree Preservation Orders (TPOs) and other mature trees</p> <p>Archaeological / Heritage Constraints (e.g. the impact upon listed buildings and/or historic parkland).</p>

Adjacent land uses (particularly noise generating uses and air quality)	Liaison with the environmental health team if necessary.
Location Type	i.e. Urban / Urban Fringe / Countryside
AVAILABILITY	
Planning status i.e. Does the site have planning permission / lapsed planning permission / is there a pre-application enquiry on the site for residential development?	This would be particularly important if there was (a) a planning application for a Gypsy and Traveller Site or (b) a planning application for new residential units in bricks and mortar.
Land Ownership details	Is this private land or publically owned land and what is the owners intentions; see previous planning applications.
Developer Intentions (if a private site)	
Planning Issues	Is there any potential for a mixed use development (see policy f of the PPTS) in this case?
Potential Management Issues of the site	Careful consideration will need to be given to the mix of ethnicities on site and potentially neighbour relations (if any) for bricks and mortar housing and employment sites
ACHIEVABILITY	
Character of surrounding area	
Land remediation costs	Any known costs in relation to contaminated land that will need to be completed before the development could take place?

Infrastructure costs	This would particularly relate to both vehicular access and the provision of services on site that would affect deliverability.
Initial conclusions	
Likely development area:	Site size and developable land to include the number of pitches.
Availability	_ years

APPENDIX 4 – A LIST OF SITES THAT HAVE BEEN ASSESSED FOR GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE (GTTS) PROVISION

Location	Parish	Status	Ownership	Type Consideration	Previous Allocation
Adversane, Stane Street	Billingshurst	Existing	WSCC	Extension to an Existing Site	None
Bromeliad Nursery	Billingshurst	Proposed	Private	Standalone Site	None
Cousins Copse, The Haven	Slinfold	Existing	WSCC	Extension to an Existing Site	None
Deer Park Farm, Hampers Lane	Forest	Existing	Private	Extension to an Existing Site	None
Denver Storage, Okehurst Lane	Billingshurst	Proposed	Private	Standalone Site	None
Fryern Park Farm, Fryern Road, Storrington	Storrington and Sullington	Proposed	Private	Standalone Site	None
Greenacres, Hillside Lane, Small Dole	Upper Beeding	Existing	Private	Extension to an Existing Site	12 pitches in the HDPF
Greenfield Farm, Valewood Lane, Barns Green	Itchingfield	Existing	Private	Extension to an Existing Site	None
Hawthorns Barn, Copsale	Nuthurst	Proposed	Private	Standalone Site	None
HDC Depot, Hurston Lane, Storrington	Storrington and Sullington	Proposed	HDC	Standalone Site	None
Hillside Park, Hillside Lane, Small Dole	Upper Beeding	Existing	HDC	Extension to an Existing Site	None
Kingfisher Farm, West Chilton Lane	Itchingfield	Existing	Private	Standalone Site	None
Lane Top, Nutbourne Road	Pulborough	Existing	Private	Extension to an Existing Site	3 pitches in the HDPF
Northside Farm, Burnthouse Lane, Rusper	Rusper	Existing	Private	Extension to an Existing Site	None
Oakdene, Blackgate Lane, Codmore Hill, Pulborough	Pulborough	Existing	Private	Extension to an Existing Site	None
Oaklands, Honeybridge Lane, Dial Post, West Grinstead	West Grinstead	Existing	Private	Extension to an Existing Site	None

Location	Parish	Status	Ownership	Type Consideration	Previous Allocation
Oldfield Stables, Fryern Road, Storrington	Storrington and Sullington	Existing	Private	Extension to an Existing Site	None
The Orchard, Hole Street, Ashington (Travelling Showpeople)	Ashington	Existing	Private	Extension to an Existing Site	None
Parsons Field, Pickhurst Lane, Pulborough	Pulborough	Existing	Private	Extension to an Existing Site	None
Pear Tree Farm, Furners Lane	Henfield	Existing	Private	Standalone Site	None
Rowfold Nurseries, Coneyhurst Road, Billingshurst	Billingshurst	Existing	Private	Standalone Site	10 pitches in the HDPF
Smithers Rough, Guildford Road (A281), Rudgwick	Rudgwick	Proposed	HDC/Private	Standalone Site	None
Southside, Honeybridge Lane, Dial Post (Travelling Showpeople)	West Grinstead	Proposed	Private	Standalone Site	None
Southview, The Haven	Slinfold	Existing	Private	Extension to the Existing Site	4 pitches in the HDPF
Spoons, Harbolets Road	West Chiltington	Proposed	Private	Standalone Site	None
Sussex Showground, Grinders Lane, Dial Post	West Grinstead	Proposed	Private	Standalone Site	None
Sussex Topiary, Naldretts Lane, Rudgwick	Rudgwick	Existing	Private	Extension to the Existing Site	None
Whiteoaks, Henfield Road, Small Dole	Henfield	Proposed	Private	Standalone Site	None

APPENDIX 5 – GYPSY AND TRAVELLER SITE SUBMISSION FORM

Gypsy and Traveller Site Submission Form

This form should be used to suggest sites to Horsham District Council for consideration as a Gypsy and Traveller site.

Please use this form to provide the Council with information about your site. It is important that you also send us a map showing us the boundary of the site that you would like us to consider.

Information about the site will be made available to the public, but personal details will not be published.

If you have more than one site that you would like us to consider, it would be helpful if you could use a separate form for each site. You can find additional forms on our website, <https://www.horsham.gov.uk> or by phoning the Strategic Planning & Sustainability Team on 01403 215398.

Please return this form together with a map of your site which clearly shows the site boundary to:

Strategic Planning & Sustainability Team
Horsham District Council
Parkside
North Street
Horsham
West Sussex
RH12 1RL

Alternatively you can e-mail the form and the map to:

strategic.planning@horsham.gov.uk

Your Details				
Name				
Company				
Address				
Postcode				
Telephone Number(s)		Mobile		
e-mail				
I am	The landowner		A developer	
	Planning consultant		A registered social landlord	
	Land Agent		Other (please state)	
If you are not the land owner, who owns the site?				

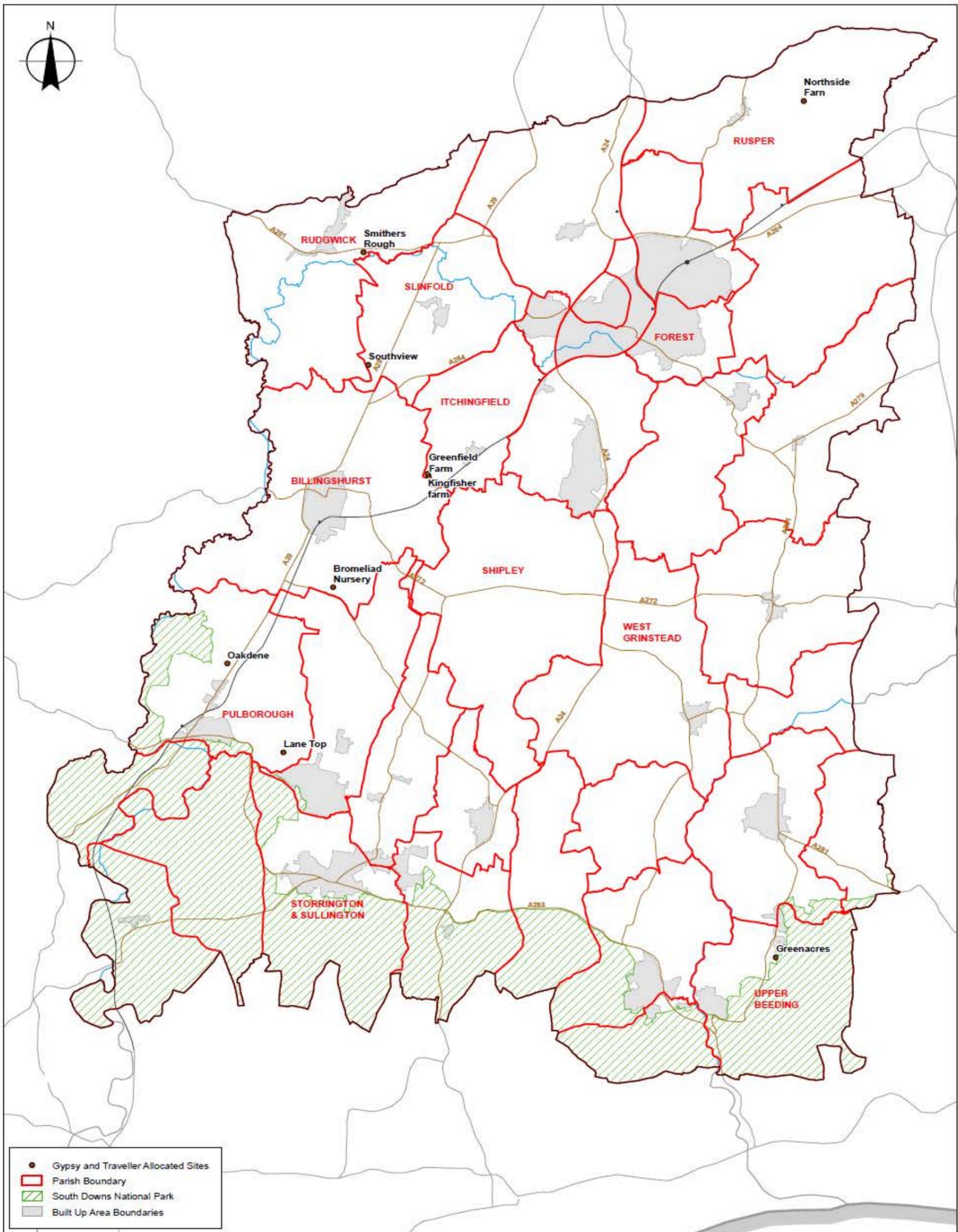
Please use the next section to provide us with information about your site. If you do not know the details for each section, the boxes can be left empty.

Site Details	
Site Address	
Site Area (hectares):	
Current Use(s) of the Land: (e.g. farmland, yard, existing Gypsy and Traveller site)	
Use(s) of Land around the Site: (e.g. farmland, roads, existing Gypsy and Traveller site)	
Relevant Planning History: (for example previous planning applications on the land)	

Please use the next box to tell us about how and when you think the site could be developed. The boxes can be left empty if you are unable to complete the details.

Development Details						
Proposed number of pitches						
When will the site be available for development?	0 – 5 years		6 – 10 years		11 – 15 years	
Are there any issues which could affect development on the site? (eg site ownership, flood risk, pollution etc)						
How could these issues be addressed?						
Any other relevant information?						

APPENDIX 6 – DISTRICT WIDE GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE SITE PLAN



- Gypsy and Traveller Allocated Sites
- ▭ Parish Boundary
- ▨ South Downs National Park
- ▭ Built Up Area Boundaries

Horsham District Council
 Parkside, Chart Way, Horsham
 West Sussex RH12 1RL
 Chris Lyons : Director of Planning, Economic Development & Property

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Horsham District - Gypsy and Traveller Sites 2017			
Reference No :	Date: 06/11/2017	Scale : 1:100,000	
Drawing No :	Drawn :	Checked :	Revisions : 13/11/2017

Report to Cabinet

23 November 2017

By the Leader of The Council

DECISION REQUIRED



**Horsham
District
Council**

Not Exempt

Horsham Town Centre Vision Statement

Executive Summary

The purpose of the report is to seek approval of the Town Centre Vision statement which has been amended in the light of public and stakeholder representations received during the consultation carried out in September and October 2017. This includes endorsement of the Delivery Schedule of future projects, in order to deliver the Vision.

Consultants' Bilfinger GVA were engaged following a competitive procurement exercise to prepare a draft Town Centre Vision statement. The objective is to establish an aspirational, comprehensive and deliverable medium term vision (10-15 years) for Horsham Town Centre.

The Vision statement seeks to achieve this having undertaken a review of broad population characteristics, retail, residential, office and hotel market factors, and an analysis of the town centre's current weaknesses and opportunities. This is then developed into a set of Strategic Directions and analysis of broad opportunity areas within the town centre, followed by a specific examination of potential development sites and future delivery steps.

Following an early stakeholder workshop held in 2016, ideas were developed into an exhibition of strategic directions and potential opportunity areas and sites, including options to improve the Bishopric public realm, which were consulted on in May and June 2017 with feedback incorporated into the emerging draft 'Vision' statement. The majority of responses supported the strategic directions identified in the 'Vision' and the opportunity sites with the exception of the redevelopment of the Sainsbury's store and car park which has now been removed from further consideration.

The draft Horsham Town Vision statement is now recommended to be approved as the overarching framework for the delivery of a number of town centre projects that are set out in section 9 of the Vision statement

Recommendations

That the Cabinet is recommended:

- i) To note and consider the representations and responses received during the consultation and approve the Horsham Town Centre Vision statement incorporating amendments as detailed in Appendix C.

- ii) Endorse the Delivery Schedule of projects, at Section 9 of the statement and as attached in Appendix D, to bring forward development and enhancement opportunities over the 'Vision' period.
- iii) Delegate authority to the Leader of the Council to approve minor editorial changes prior to publication.

Reasons for Recommendations

- i) Amendments have been made in the light of responses received on the draft Horsham Town Centre Vision statement.
- ii) To provide guidance on the future development of Horsham Town Centre and to implement a Delivery Schedule of projects to further develop the 'Vision' in detail.
- iii) There is a need to allow for minor editorial changes. Any significant changes to the document would need to be reported back to Cabinet for approval before publication.

Background Papers

- Horsham District Hotel and Visitor Accommodation Study 2016
- Horsham Town Centre Parking Review 2016
- Horsham Town Retail & Leisure Study 2017
- Town Centre Vision Exhibition Consultation Response Summary June 2017
- Bishopric Consultation Responses June 2017

Wards affected:

Denne, Forest, Horsham Park, Trafalgar

Contact:

Dr Chris Lyons, Director of Planning, Economic Development & Property ext 5401

Background Information

1 Introduction and Background

- 1.1 Horsham town centre has a high quality historic core, most of which is designated as a Conservation Area including upwards of 50 listed buildings, which has created a high quality shopping experience for residents and visitors. However, with the close proximity of larger competing centres such as Crawley, Guildford and Worthing, and the changing needs of modern retailers and e-commerce, it is essential that the Council continues to understand these changing needs and looks to strengthen the retail offer and promote a 'Vision' that identifies and encourages future opportunities for further enhancement, without causing harm to the high quality historic environment.
- 1.2 Horsham town has a good record as a successful retail location as evidenced, for example, by the opening of John Lewis Home and Waitrose stores and has generally survived the recession well with comparatively low void (empty shop) rates. Although it is recognised that Horsham town may not be capitalising on its full potential and that competing centres may be larger and currently provide a wider range of retail and leisure choice, it is also recognised that the town offers an alternative experience based on its high quality public realm, attractive cafés, restaurants and independent shops supported by key anchor stores that provide the basis for the existing high levels of consumer retention.
- 1.3 The purpose of the 'Vision' process was to:
- Identify key drivers and opportunities for Horsham Town Centre;
 - Examine the retail, office, housing, hotel markets and overall viability context;
 - Integrate parallel retail, hotel and transport studies and produce a deliverable, composite picture of the future;
 - Address the role of development opportunities;
 - Consider other improvements within the town centre;
 - Proactively plan for the future;
 - Be flexible enough to respond to opportunities; and
 - Ensure long-term competitiveness as the town continues to change and evolve.
- 1.4 Particular concerns at the outset were sustaining Piries Place following Waitrose's relocation; improving Blackhorse Way; improving the retail offer to Horsham's 'West End'; developing the night time economy and identifying and promoting viable development opportunities that enhance and support the town's future.
- 1.5 Following the establishment of a Project Board and an all Member seminar in late 2015, consultant services were procured with the following remit and scope:
- To produce a vision of planned, emerging and future development opportunities.
 - Possible public realm improvements within the town centre.
 - Bring together retail/leisure, hotel and parking studies.
 - Show how the changes could look and feel - how they could relate to each other and the town centre.
 - Provide clarity on what can be delivered, what needs to be 'unlocked' and how to achieve this.
 - Vision to be economically viable and deliverable.

- Proactively planning for the future and be flexible enough to respond to opportunities.
 - To inform and stimulate discussion with our local community.
 - The town centre area for this purpose was defined as the area bounded by Albion Way, Parkway, East Street, Denne Road and the River Arun including secondary retail/gateways at Queen Street and Freshwater Parade and North Street.
- 1.6 A baseline review gathered key information on the existing planning framework including key policies and targets, the planning and investment pipeline, market conditions, key opportunity sites and socio-economic conditions with initial scenarios for selected sites and locations were also prepared. Community views were also examined through feedback on the emerging business Neighbourhood Forum being prepared by Horsham Blueprint. From this analysis the town centre's strengths, weaknesses, opportunities and threats (SWOT) were identified. In response a set of Strategic Directions were developed to influence broad policy and investment directions as well as shape responses to specific projects.
- 1.7 A stakeholder workshop was held in June 2016 to present the baseline research, SWOT analysis and the emerging Strategic Directions and to discuss key topics – What is important to keep? What needs to be strengthened? What needs to change and how should it change? Consultation was then undertaken with key landowners including Sainsbury's, West Sussex County Council, AVIVA, Reef Estates, Royal Sun Alliance and Network Rail.
- 1.8 A further seminar was held for Members on 10 May 2017 prior to a second stakeholder meeting held on 18 May within Swan Walk shopping centre. A Town Centre Vision and Bishopric Enhancement Exhibition comprising a review of the town's strengths and weaknesses, strategic directions and site improvement opportunities and areas, was held on 19 and 20 May to which over 1100 visitors attended. The Exhibition transferred to Horsham Library until 19 June. Over 320 responses were received, across all age ranges, to the 'Vision' ideas and Bishopric enhancement options including responses from Sainsbury's, AVIVA, Denne and Forest Neighbourhood Councils and Horsham District Cycling Forum. A summary of the overall consultation responses are attached at **Appendix A** and **B** respectively.
- 1.9 Significant levels of support were expressed for the seven Strategic Directions as follows:
- SD1 Respond to demographic change.
 - SD2 Strengthen retail and leisure, support employment growth and the economy.
 - SD3 Increase and diversify housing provision.
 - SD4 Expand hotel provision.
 - SD5 Support new cultural and community infrastructure.
 - SD6 Enhance access and movement.
 - SD7 Evolving image and identity.
- 1.10 There was overall support for the following identified Opportunity Areas:
- North Street Commercial Quarter; West/Forum/Sainsbury's pedestrian link;
 - Blackhorse Way – Waste and Servicing and improving the public realm but retaining current Carfax bus stops;

- Forum and Library Areas to provide additional residential and retail accommodation and to examine the provision of a new, larger, replacement library and health facilities together with housing and retail uses;
- Improve the Queen Street area and identity;
- Examine the potential for additional car parking and housing on the Station and RSA car parks; and
- Enhancement options for the Bishopric.

The idea to relocate the Sainsbury's store with underground car parking to the west, facing Worthing Road, to free up space to provide additional housing was not supported and has been omitted from further consideration.

2 Relevant Council policy

- 2.1 To develop and progress a Horsham Town Centre Vision is a 2016-19 Corporate Plan Economic priority - to support and improve the local economy.

3 Details

- 3.1 Following the analysis, stakeholder engagement and the public exhibition in May and June 2017, a draft Town Centre Vision statement was finalised over the summer taking account of all feedback received to date.
- 3.2 A further all Member Seminar was held on 12 September prior to the start of public and stakeholder consultation from 18 September to 16 October. Over 96 representations have been received from interested individuals as well as responses from AVIVA, Denne Neighbourhood Council, Horsham District Cycling Forum, Horsham Society, Horsham in Bloom and West Sussex County Council. Changes are proposed in the light of the comments received. A copy of all representations, responses and proposed amendments is attached at **Appendix C**.

Consultation Summary

- 3.2 AVIVA supports the Horsham Town Centre Vision in the context of creating an enhanced, diverse and competitive retail and leisure environment that sets out to compete with the changing behaviours of the retail industry, such as online shopping, and the growth of competing centres. Swan Walk is a strategic asset both in its location and its current and prospective retail offering. The recognition of Swan Walk as an opportunity area is therefore strongly encouraged to strengthen the retail and leisure offer in line with the Council's strategic direction and enhance the competitiveness of the town centre.
- 3.3 *The 'Vision' statement will be amended to recognise the shopping centre, as a whole, as an opportunity area to support future enhancement and improvement schemes by the provision of new retail, leisure and restaurant floorspace to complement the existing retail offer and support the vitality and viability of the shopping centre. Amendments are detailed in **Appendix C**.*
- 3.3 Denne Neighbourhood Council while agreeing with most of the views in the 'Vision' the Neighbourhood Council has commented that very little, in terms of development and enhancement opportunities, is new and that there are few solutions to existing problems.

- 3.4 *The purpose of the 'Vision' was to examine the factors that would impact on the town centre over the next 10 years and provide a strategic response while identifying and seeking agreement on a broad range of opportunities to be developed further. The 'Vision' is not intended to be a finalised view of the town centre but seeks to identify a broad range on projects and initiatives to be progressed in detail. The Town Centre Vision statement is intended to be the start and not the end of a continuing conversation about the way in which the town centre can and will develop. Section 9 of the 'Vision' statement outlines the Delivery Schedule which sets out the specific projects, aligned to the overall Strategic Directions, to be developed in detail and consulted on in due course.*
- 3.5 *The Neighbourhood Council also provide a number of detailed suggestions and comments which are listed with responses in **Appendix C**.*
- 3.6 Horsham District Cycling Forum (HDCF) object to the Vision because it feels it offers nothing for cycling or meaningful improvements to cycling facilities. The Forum believes that the Vision should have been an interesting, challenging and ambitious approach to how develop Horsham and the town centre, how to reach it by cycle, how to build a network of cycle routes, how to cross the dual carriageways to reach the centre, how to reach the shops, how to get around and what the future holds for the town and its residents.
- 3.7 *While supportive of the Forum's overall aspirations, the Council throughout all the stakeholder engagement has made clear the remit of the 'Vision' is a strategic document with a focus on broad opportunity areas and key sites with detailed plans to be developed in due course once the broad strategic vision has been consulted upon and approved.*
- 3.8 *The Council is committed to developing a Walking and Cycling strategy as part of the 'Vision's' future Delivery Schedule and to working with the Forum, West Sussex County Council and other key partners to bring it to fruition. **Appendix C** provides responses to the detailed series of comments also submitted by the Forum.*
- 3.9 The Horsham Society, in summary, requests that the Vision be more ambitious, tackling the difficult questions of access into town, improvement of the gateways, the crossings of Albion Way, entertainment options, residential ideas for different age groups, education, tourism as well as creating a north to south route, to name a few. Overall, the Society believes that the Vision lacks breadth and ambition.
- 3.10 *Similar to the response to the Cycling Forum, the remit of the 'Vision' is strategic in nature with detailed projects, such as those suggested by the Horsham Society, to follow through the implementation of the Delivery Schedule.*
- 3.11 The Society acknowledges that:
"The Vision does propose the development of a Public Realm Strategy, a Cycling Strategy, a Walking Strategy and a Tourism Strategy, all as key projects. It is important that these are separate documents, each concentrating on either a single mode of transport or a single issue and we expect them to cover many of the issues we highlight."

- 3.12 *As stated in the Delivery Schedule the Council is committed to bringing forward detailed strategies and projects working with the key partners as listed including the Horsham Society. It should be acknowledged that each project is a major and detailed area of work in itself. What the draft 'Vision' establishes, following the baseline analysis, exhibition and consultation is a broad consensus on the way forward in terms of the Strategic Directions and the key Opportunity Areas and sites. Responses to the Horsham Society's detailed comments are included in Appendix C.*
- 3.13 *Horsham in Bloom (HIB) raised concerns regarding the absence of "Greening" within the 'Vision' including the artist's impressions of the Bishopric and Piries Place and requests that 'Greening' is regarded as an integral element with comparable importance as the preservation and enhancement of the town. It requests that its organisation is recognised as a Key Partner within the Delivery Scheduled projects.*
- 3.14 *The Council welcomes and accepts that 'Greening' as part of any future public realm landscaping project is an important consideration to be taken together with the preservation and enhancement of the town's historic character. Horsham in Bloom is recognised as a Key Partner in bringing forward the Delivery Schedule.*
- 3.15 *West Sussex County Council welcome the development of the 'Vision' and notes that the Strategic Directions and Opportunity sites have been subject to consultation and the Vision amended accordingly including the development of a delivery schedule for those sites. The County Council has set out that there will be a need for schemes to be developed, designed, tested and refined using evidence; be subject to business cases, consultation and all relevant statutory processes before they can be implemented. This is acknowledged and the 'Vision' amended accordingly.*
- 3.16 *The County Council support, as set out in the Delivery Schedule, the preparation of a public realm strategy and a walking and cycling strategy, with Horsham District Cycle Forum (HDCF) and WSCC being referenced as key partners in both cases. The walking and cycling strategy should highlight the priority routes for future investment in order to increase levels of walking and cycling. Through this work consideration should be given to the aims and objectives of the West Sussex Walking and Cycling Strategy 2016 – 2026 and the list of potential schemes contained within it as well as the Government's cycling and walking investment strategy (CWIS) and the target to double levels of cycling by 2025.*
- 3.17 *Support for the strategies is welcomed and as set out in the Delivery Schedule. The proposed Walking and Cycling Strategy will reference and address the aims and objectives of the existing County and Government strategies.*
- 3.18 *The County Council said it looked forward to continuing to work with the District Council on the identified opportunities affecting land in County ownership in the town centre such as Horsham Library and notes that there are a series of detailed matters that would need to be taken into account in bringing forward any proposals to develop the library area including the requirement above, to be subject to a detailed business case and consultation.*
- 3.19 *The District Council welcomes the opportunity to explore possible future development options, where this can also deliver demonstrable benefits for future service provision and the long term viability of the town centre, while acknowledging*

*the requirement for any schemes to comply with normal project, business case and statutory approval processes. **Appendix C** details the proposed amendments to be made in response.*

- 3.20 A number of responses from the New Street Neighbourhood Action Group and the Friends of New Street Garden were received on 9 November after the consultation closing date. These have been included in **Appendix C** together with recommended responses for consideration by Cabinet.

4 Next Steps

- 4.1 Subject to Cabinet's agreement to approve the 'Vision' statement the amended version will be published in due course following the call-in period. Following this, project teams will be established to commence work on the listed Delivery Schedule projects. The Delivery Schedule forms part of Section 9 of the Vision but is separately attached at **Appendix D** for ease of reference.

5 Views of the Policy Development Advisory Group and Outcome of Consultations

- 5.1 The Horsham Town Vision is sponsored by the Leader of the Council as a key corporate project whose governance includes a Project Board, made up of Horsham Town Centre Members as well as the Cabinet Member for Planning and Development and the Cabinet Member for Local Economy. Unlike other Cabinet Members there is no associated Policy Development Group. In place of this, All Member seminars have been held as detailed in Section 3 together with details of all external consultations undertaken, the results and outcomes. The Town Centre Vision Project Board was consulted on 6 November and approved the draft Cabinet report.

6 Other Courses of Action Considered but Rejected

- 6.1 The Council has no legal obligation to prepare a Vision for its main town and could choose not to do so but it is considered that a proactive approach is the most effective way to maximise development opportunities and further investment in the town centre.

7 Resource Consequences

- 7.1 There are no resourcing or staffing implications associated with the adoption of the 'Vision' statement. However, there will be revenue and capital resource costs in bringing forward the Delivery Schedule projects. Each project will be required to quantify resource cost as part of the business case project approval process.

8 Legal Consequences

- 8.1 There are no legal implications associated with the adoption of the 'Vision' statement. It is current council policy as part of the Corporate Plan 2016-19 to produce a Horsham Town Centre 'Vision' statement.

9 Risk Assessment

- 9.1 There are no significant risks associated with the Horsham Town Centre Vision statement.

10 Other Considerations

- 10.1 The Council has a public sector equality duty under the Equality Act (2010). There are no consequences of the actions proposed in respect of Equality & Diversity, Human Rights; Sustainability and Crime and Disorder. Equality Impact Assessments will be undertaken in due course with respect to the Delivery Schedule of projects as they are being developed.

APPENDIX A Town Centre Vision Exhibition Consultation Summary Report

APPENDIX B Bishopric Exhibition Consultation Summary Report June 2017

APPENDIX C Horsham Town Centre Vision Statement - Representations and Responses

APPENDIX D Horsham Town Centre 'Vision' Delivery Schedule

APPENDIX E Draft Horsham Town Centre Vision Statement

The appendices are separately attached as part of the Cabinet agenda

Background Papers can be viewed on the Council's website: [here](#) or

<https://www.horsham.gov.uk/planningpolicy/planning-policy/horsham-town-centre-vision>

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APPENDIX A

Town Centre Vision Exhibition Consultation Summary Report

A public exhibition was held in Swan Walk on 19 and 20 May at which over 1100 people attended. The exhibition transferred to Horsham Library from 23 May to 19 June and was made available on line from 19 May to 19 June. We received 164 detailed survey responses across all age ranges with additional responses from companies, groups and individuals with the following summary and detailed responses:

Strategic Directions

Seven strategic directions were developed from an initial analysis of the town's strengths, weaknesses, opportunities and threats. Responses confirm significant levels of support for all strategic directions. However, while a majority support the need for more housing and affordable housing to meet demand and support the town centre a sizeable minority do not.

SD1 Demographic Change: High degree of support with 75% in agreement, with only 6% disagreeing, to make provision for more and better leisure and retail opportunities for families and a growing younger population.

SD 2 Strengthen retail, leisure and support employment growth: 50% agree with 34% strongly in agreement – 84% overall.

SD3 Increase and diversify housing provision: Housing provision divided opinion but with a majority in overall support. Overall 48% agree and 35% disagree with half as many again offering a neutral opinion. 18% and 15% strongly agree and disagree respectively.

SD4 Expand hotel provision: Majority support strategy with 51% agreeing overall with a notable neutral score of 31%.

SD 5 Support new cultural and community infrastructure: There was strong support shown for the strategy with 36% strongly agreeing and 40% agreeing – 76% overall.

SD6 Enhance access and movement: 80% are in overall agreement with minor dissent for improving gateways, signage, appearance of town and car parks, cycling facilities and additional parking to meet demand.

SD7 Evolving image and identity: 56% strongly agree, the highest score recorded for any of the strategies and with the overall highest combined agreement score of 90%. Only 3 respondents out 164 disagreed.

Opportunity Areas

North Street Commercial Quarter: Strong support shown with 71% overall agreeing to retain area for future offices, hotel location and public realm enhancement.

Forum/Sainsbury's – Pedestrian Link: Strong support shown to improve the link with 79% overall in agreement with a notable 37% strongly in agreement.

Blackhorse Way – Better waste and servicing arrangements: Of all of the opportunity areas this issue received the most support with 46% strongly agreeing and 35% agreeing – 81% overall.

Blackhorse Way – One way system, improving pedestrian facilities: Overall 70% were in agreement with 12% disagreeing. Comment responses supported the one way initiative but wished to retain the Carfax bus stops rather than remove busses from the town centre. This was seen, particularly by the elderly, as a key facility to retain as it allowed easy access to the centre of town with reduced walking distances, better access for those with disabilities and when carrying shopping.

Forum and Library Areas – Civic Hub/New library: 28% strongly agreed with a further 37% in agreement. Overall 17% disagreed with comments citing that the library worked well as it was and 'didn't see the need' to replace it.

Forum and Library Areas – Additional housing, larger footprint shops, improve Worthing Rd links: Responses were split between those who wished to see development and those who wished to retain the area

as it is - 27% agreed, 23% disagreed, 13% strongly agreed with 17% strongly disagreeing – an overall 40/37 split with 1 in 5 respondents neutral.

Forum and Library Areas – Housing and Shops/Enclosing Forum on southern side: The main response was neutral at 37% but retaining a similar level of overall support at 39%. 24% overall disagreed.

Sainsbury's Store and Car Parks: The idea of relocating the store westwards with underground parking to free up housing space was opposed with 23% disagreeing and 21% strongly so. Again about 1 in 5 respondents were neutral. Despite overall opposition there was combined support of 34%. The idea will not be progressed further at this time unless there is a significant change in circumstances.

Queen Street – Identity and public realm improvement: Overall 79% support the improvement of the Queen Street area with some neutral at 16% but with only 5% opposed.

Station and RSA Car Parks: Overall 51% support the idea, with 21% strongly in support, of trying to increase parking provision with or without possible additional housing. However, 32% were neutral with 12% disagreeing and 5% strongly so.

Commentaries

Sainsbury's: Store relocation unviable but explore Forum Plaza/Library areas and improve links between store and town centre.

AVIVA: Welcomes the Town Centre Vision as a vital document to support growth and investment with particular support for 'more and better leisure and retail opportunities for families and a growing younger population' and 'more and better leisure and retail opportunities for families and a growing younger population'; Strong support is also offered for the Swan Walk opportunity area to support the continued enhancement of the shopping centre to respond to modern retailer requirements and improvements to the pedestrian environment to increase footfall, vitality and viability and in particular improving links between the primary shopping area and John Lewis at Home/Waitrose.

Forest Neighbourhood Council: Seeks traditional signage which is prominent and encourages visitors; traditional seating with backs to reinforce market town image; more creative greenery, supports new Bishopric trees and notes need to improve west entrance to West Street; supports Blackhorse Way one way and improving pedestrian safety; library to be retained within town centre; endorses Denne Neighbourhood Council position on subways into town; supports improving Queen Street to make more attractive, encourage specialist shops, seeks engagement in any future discussions.

Denne Neighbourhood Council: Positive that 'stakeholder' meeting points have been incorporated: 'need to improve initial impressions such as Blackhorse Way and gateways including Queen Street/Iron Bridge and Freshwater Parade as well as links between town and Albion Way crossing points. Additionally request inclusion of North Street subways; Blackhorse Way and links a priority; supports additional station parking decks; need to ensure Capitol's future; supports Wi-Fi to town and park; opposes high density housing at Sainsbury's site, seeks community space retention; retain and expand 'green corridors and increase 'greening'. Disappointed no proposed supermarket to east of town.

Horsham District Cycling Forum: Welcomes analysis that cycling routes are weak and lack connections and proposes that Horsham has a strategic direction as a 'cycle friendly town'; Sees as a major omission the lack of a comprehensive cycle plan to make this happen; seeks 3m wide cycle routes east/west and north/south through Bishopric area and cycle parking; supports one way system and cycling contra flow to Blackhorse Way; seeks permissive north/south Carfax route and cycle lane and parking for Queen Street; cycle parking to Freshwater Parade and Piries Place facilities; improved cycle track to Springfield Road.

Detailed Survey Responses

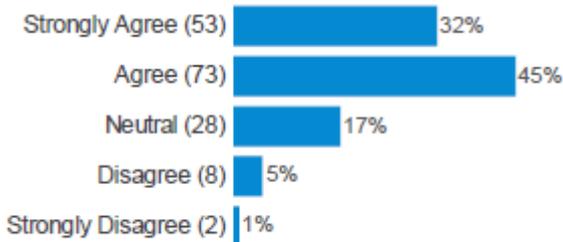
Town Centre - Strategic Directions

Overall 164 respondents completed this questionnaire with summary results as follows:

Having looked at the health of the town centre a number of strategic directions have been proposed to address the issues. How far do you agree with them?

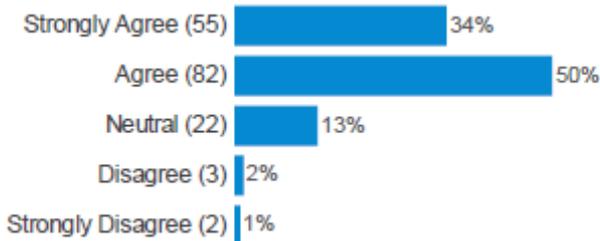
Q1 SD1: Respond to demographic change

Provide more and better leisure and retail opportunities for families and a growing younger population.



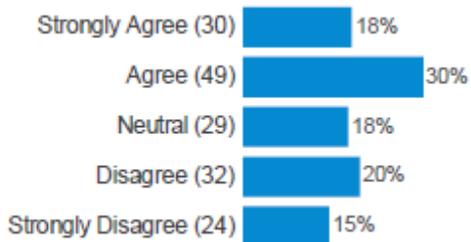
Q2 SD2: Strengthen retail and leisure, support employment growth and the economy

Provide a larger choice of town centre uses and experiences, including leisure and a range of shop sizes, including flexible employment space.



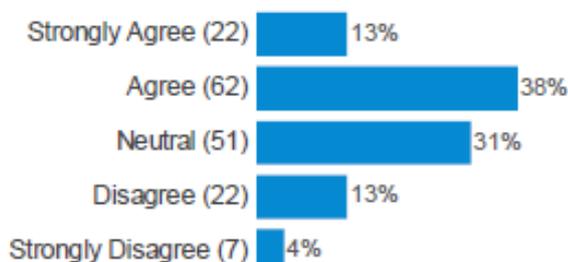
Q3 SD3: Increase and diversify housing provision

Provide new, high quality housing developments to meet local needs and increase town centre visits



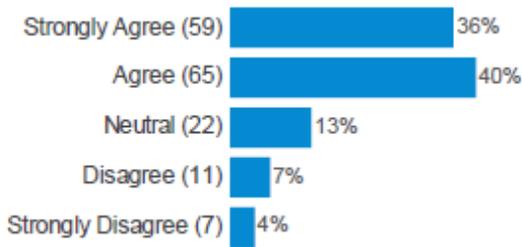
Q4 SD4: Expand hotel provision

Provide a contemporary offer for business travellers, weekend tourist and family occasion visitors, with potential for both budget and a smaller up-market 'boutique' hotel with potential for a Horsham conference venue.



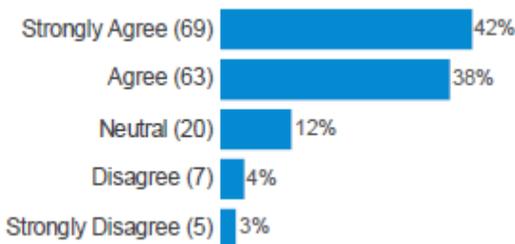
Q5. SD5: Support new cultural and community infrastructure

Provide and improve town centre cultural and community facilities to create more activity, improve the night time economy and increase sense of community. Support and diversify The Capitol's cultural offer



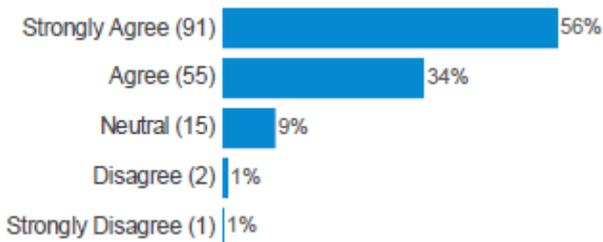
Q6 SD6: Enhance access and movement

Focus on improving gateways into the town centre, make it easier to find your way around, improve the appearance of the town, improve cycling facilities, upgrade appearance of car parks and provide additional car parking to meet demand.



Q7 SD7: Evolving image and identity

Define and promote Horsham's identity as a modern market town. Encourage use of historic building forms and materials; reduce blank facades and unsightly servicing and large bin storage areas

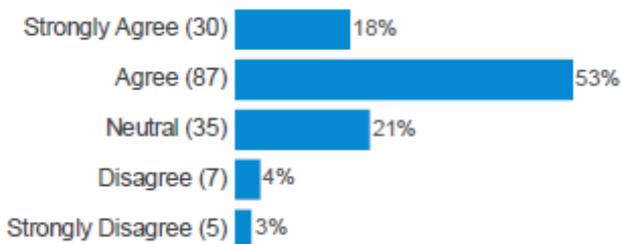


Opportunity Areas

Analysis has identified a number of opportunity areas where new development and other changes could be considered.

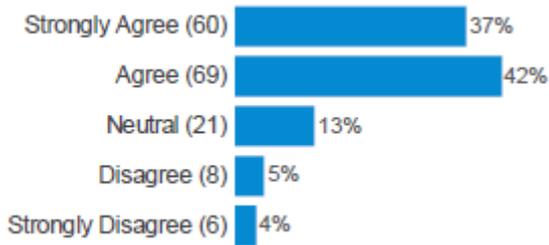
Q8 North Street Commercial Quarter

Retain area for future offices and a possible hotel; ensure provision for small and medium sized businesses; enhance the public realm so it's easier to get to and from the town centre.



Q9 The Forum/Sainsbury's

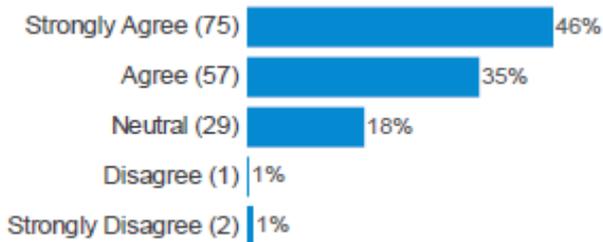
West Street/Forum pedestrian link is poor and narrow with poor visibility. There may be opportunities to improve this link through acquisition of retail units or 'softer' approaches including lighting, decorative and crossing improvements.



Q10 Blackhorse Way (1)

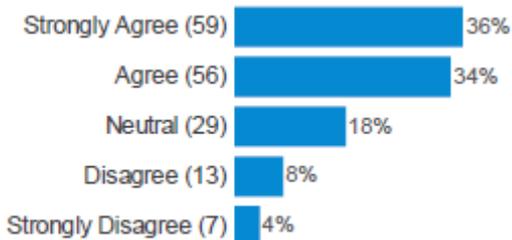
Blackhorse Way is a back street, put to a variety of competing uses: servicing, informal car parking, trade waste bin storage, car and bus access.

Waste and servicing arrangements could be better organised. Possible improvements could include screening, removing bins from the highway or providing a centrally managed facility and enforced if necessary.



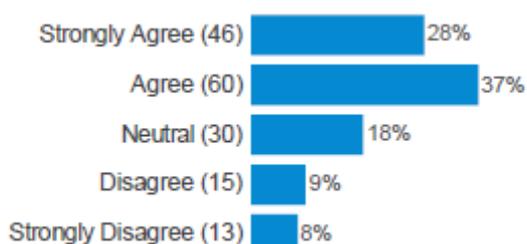
Q11 Blackhorse Way (2)

There may be an opportunity to reduce traffic flows, reducing congestion, by re-introducing a one-way system, removing buses and heavy lorries and improving pedestrian facilities, such as widening pavements in places.



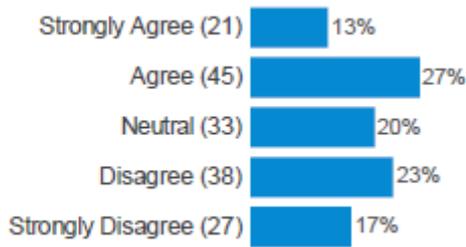
Q12 Forum and Library Areas (1)

Make better use of the Forum and Library areas. Potential to provide a replacement library that expanded its role combined with other uses such as the surgery and Citizens Advice Bureau to create a stronger civic 'anchor' for this part of the town centre.



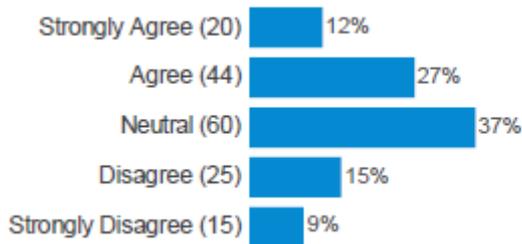
Q13 Forum and Library Areas (2)

Provision of additional housing, improve through routes to Worthing Road and the bus station. Larger sized shops could be built to attract missing stores from the town.



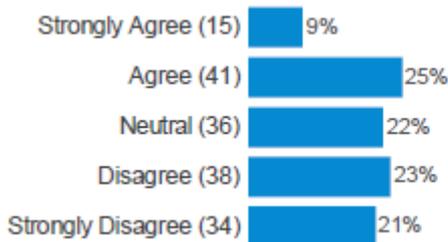
Q14 Forum and Library Areas

By enclosing the Forum on the southern side it could make for a more pleasant, sheltered environment to shop and spend time.



Q15 Sainsbury's Store and Car Park Areas

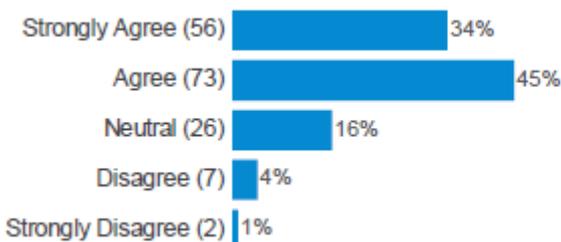
Opportunities to redevelop the car park could include the Sainsbury's store itself. One suggestion is to relocate Sainsbury's westwards next to Worthing Road with underground parking and housing built on top of the store to make best use of the whole site. There is an opportunity to provide a range of housing types, some for sale, rent or shared ownership to meet housing needs in a sustainable and affordable manner.)



Q16 Queen Street

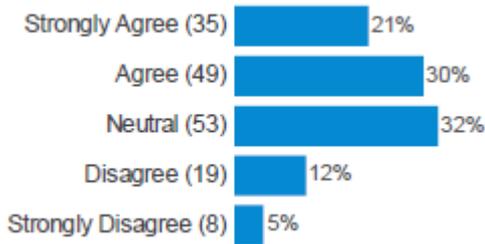
Queen Street is a secondary retail area providing mainly local services to residents and should be supported as it provides the potential for greater provision of independent and alternative stores. While some buildings have character the rail bridge is unwelcoming and unsightly. The Pets at Home/Majestic Wine stores have blank facades.

The area could develop a distinct identity from the town centre to create an alternative sense of place. Improvements could include better paving, shop front improvements, more planting, cleaning up the rail bridge and some public art.



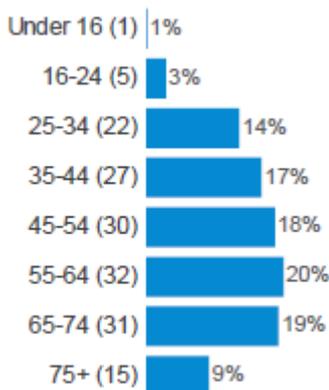
Q17 Horsham Station and Royal Sun Alliance Car Parks

The car parks are not the most efficient use of space as it is all surface parking. There may be opportunities to increase parking provision by the addition of deck or multi-storey parking combined with other uses. Residential development may be appropriate in this location, given the predominantly residential setting.

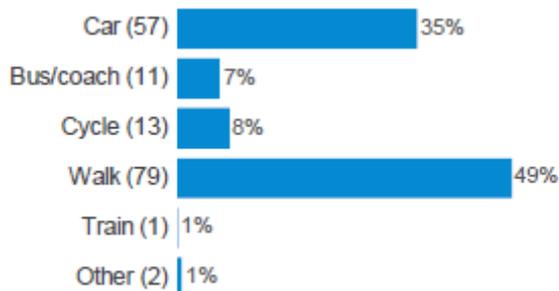


Respondent Profiles

Q18 What age group do you belong to?

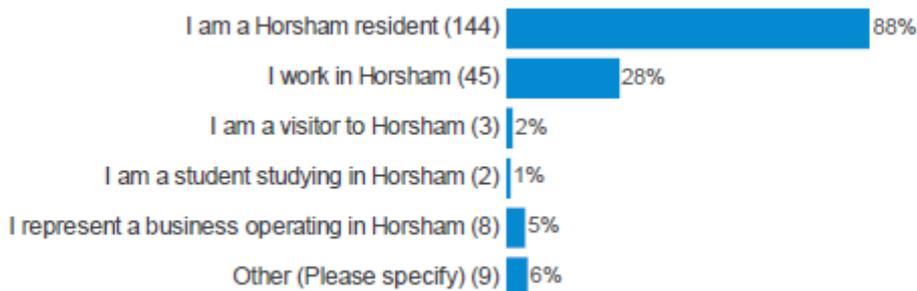


Q19 When you visit Horsham town centre how do you mostly get there?



Q20 Why do you come into Horsham town centre?

(Multiple responses allowed)



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APPENDIX B

Bishopric Exhibition Consultation Summary Report June 2017

This is a summary of the public feedback following a staffed exhibition at Swan Walk, between 18 and 20 May 2017 and then a static display in Horsham Library from 23 May – 20 June 2017. There were in excess of 1100 visitors to the staffed exhibition over the two days. Appendices A and B include details of the questionnaire responses.

Overview

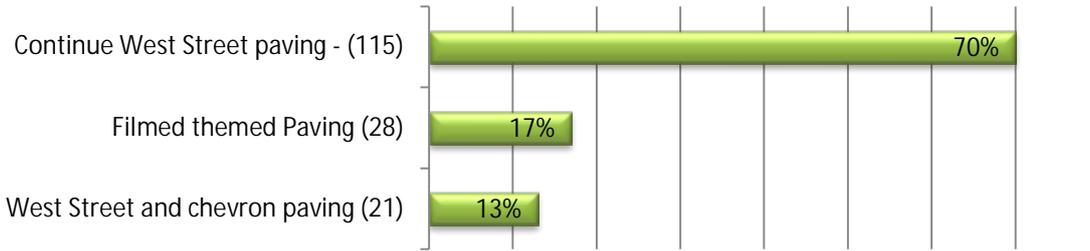
1. The general consensus from the feedback is that people are generally happy with the Bishopric area where the existing stream and waterfall are located although it was felt the area could be opened with the removal of the tree line to include the Bishopric on the other side of Albion Way. It has been acknowledged that businesses in the area and footfall in general would benefit from some of the existing vegetation being removed, however overall the public were keen to retain as much soft landscaping as possible.
2. With the arrival of John Lewis at Home and Waitrose on the west side of Albion Way in 2014, there was support to improve direct connectivity to the stores and access to Freshwater Parade and the Bishopric itself. One main concern was the existing pedestrian crossing which many people felt needed improving.
3. With the increase in the popularity of businesses on the west side of Albion Way, the Bishopric / Freshwater Parade area was highlighted as in need of improvement to both the paving and parking restriction.
4. Several people were very keen to keep the historical character of the area and felt that the 'old market town' character should be retained rather than a more modern design.
5. Of the three paving options, sketch 1, 'Continue West Street paving' was favoured by 70% of respondents. Any paving scheme should include the north and south arms to St Johns Church and the bus station and link into West Street and Freshwater Parade.
6. Slightly more people were in favour of retaining the fairy wood but most were supportive of some kind of central feature as a meeting point with more seating laid out around it. There was also a wish to see additional seating and street furniture across the pedestrian area.
7. The introduction of a new water feature was not popular due to concerns over lack of maintenance in the future, but retaining the existing waterfall and or the stream was generally favoured.
8. Of the other features which include decorative lighting, West Street lettering, and insert paving text, these received a mixed reaction but generally it was agreed that improvements are required to the lighting, and paving in some form.
9. Many people would like to see an events area for this end of town and were also supportive of more town centre event days or markets as a way of increasing visitors this area and the town centre.

Of the various other comments the main item was to retain the market town feel to Horsham with one identity rather than mixed designs in a small town centre, the same wayfinding, street furniture and colour and style of signage. Other comments are listed in Appendix B

A response has been received from **Denne Neighbourhood Council** with a preference for paving option A, the continuation of the West Street design with the existing waterfall being extended to face Freshwater Parade and the existing stream being retained. On the central area they would like to see a bold dramatic feature replace the fairy wood and raised planters with seating located across the pedestrian area. More information is required on the type of lighting but they are in agreement that the area requires additional lighting to attract people to the pedestrian area.

Summary of Bishopric Enhancement Consultation Survey Responses

PAVING OPTIONS – summary of those who selected ‘Good’



Continue West Street paving

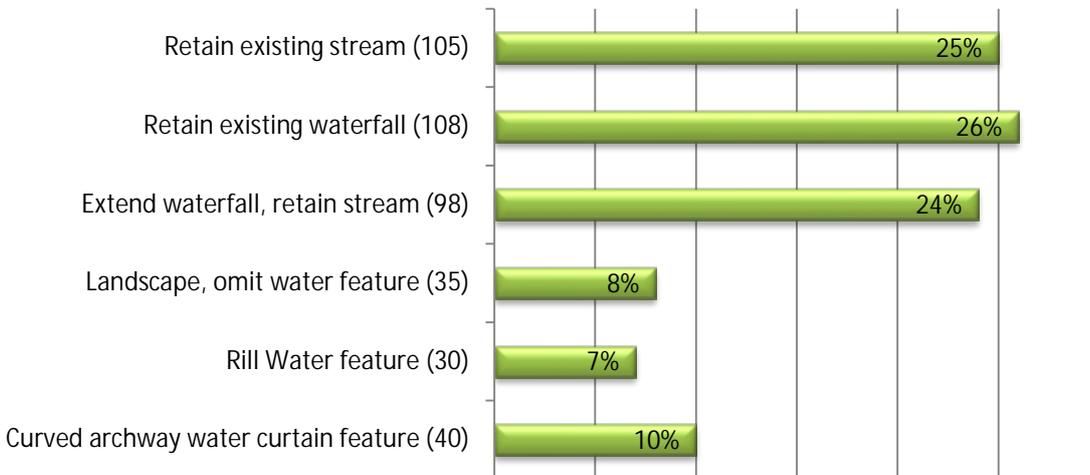


Filmed themed paving



West Street and Chevron paving

WATER FEATURE OPTIONS – summary of those who selected ‘Good’



Retain existing stream



Retain existing waterfall



Extend waterfall, retain stream



Landscape, omit water feature

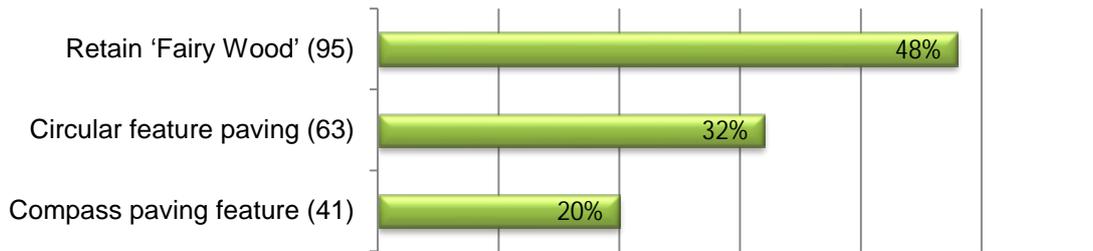


Rill Water feature



Curved archway water curtain feature

CENTRAL AREA – summary of those who selected 'Good'



Retain 'Fairy Wood'

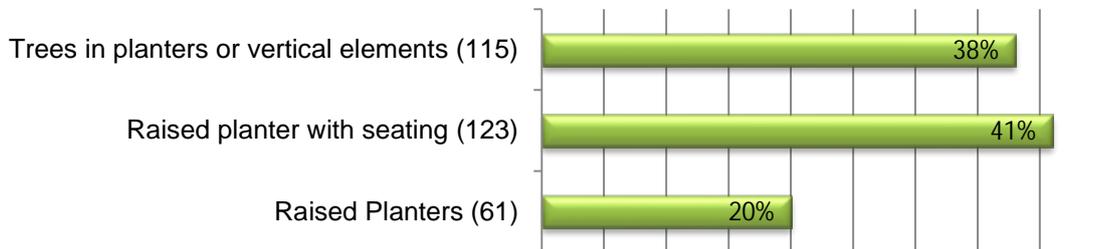


Circular feature paving



Compass paving feature

PLANTERS and SEATING – summary of those who selected 'Good'



Trees in planters or vertical elements

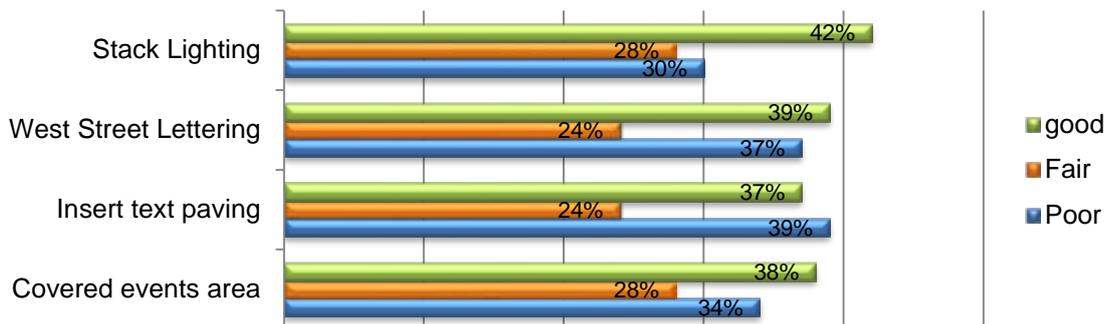


Raised planter with seating



Raised planters

OTHER FEATURES - summary responses



Stack lighting



West Street lettering



Insert paving

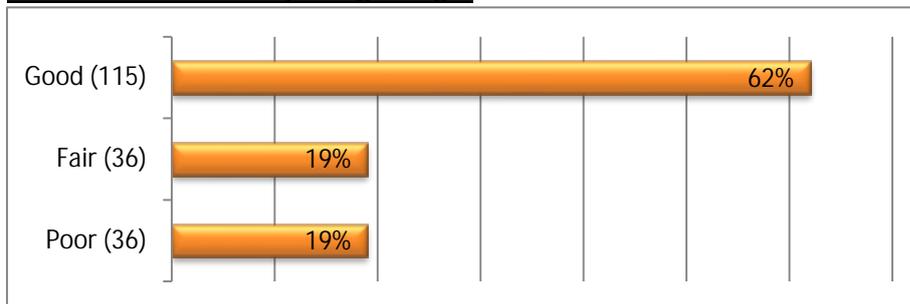


Covered events area

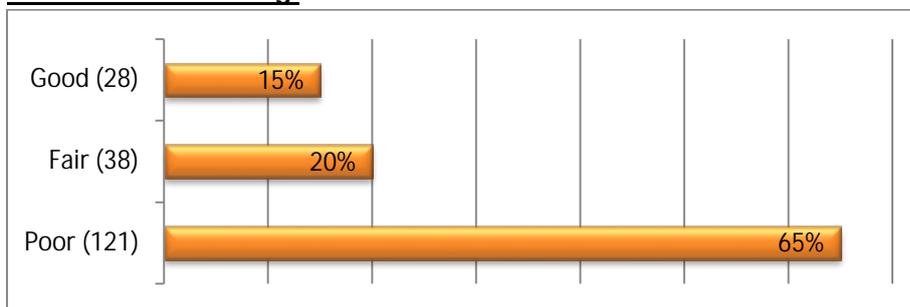
Questionnaire Responses

PAVING OPTIONS

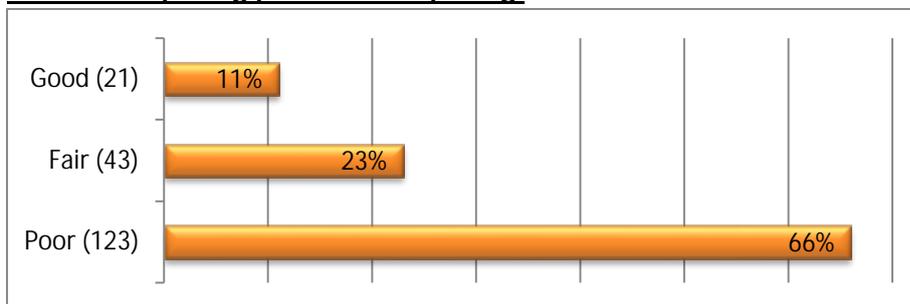
Continue West Street paving design.



Filmed themed Paving.

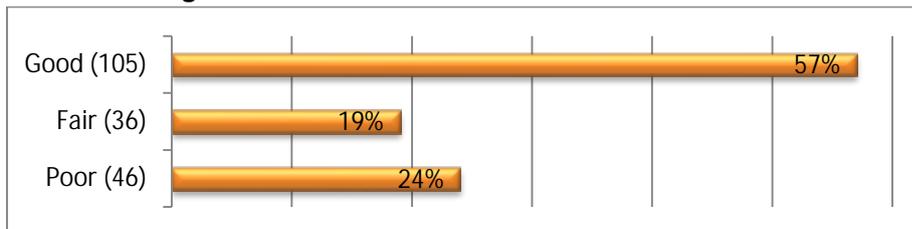


West Street paving plus chevron paving.

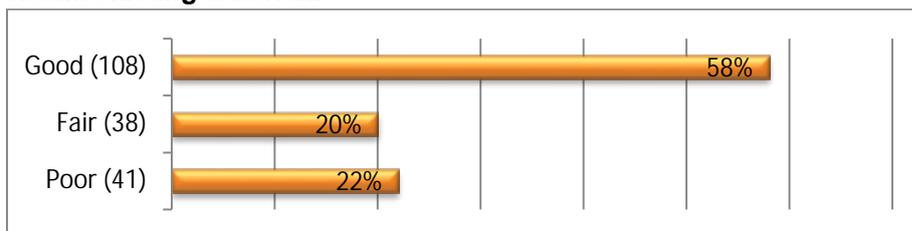


WATER FEATURE OPTIONS

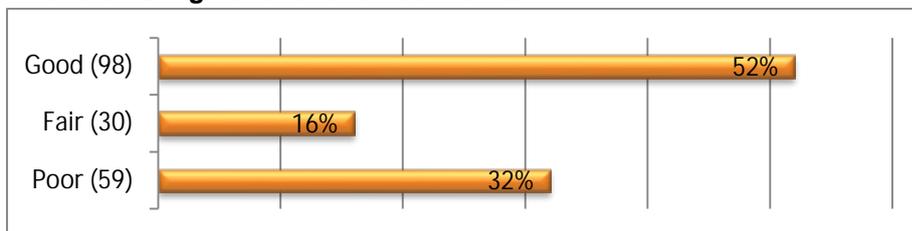
Retain existing stream.



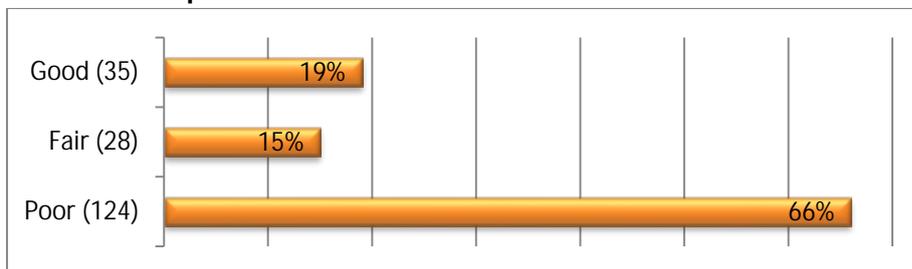
Retain existing waterfall.



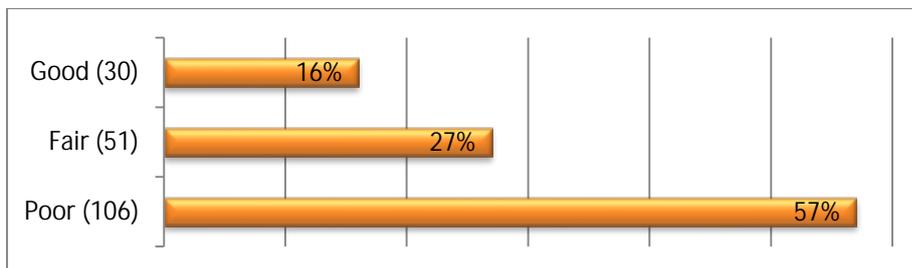
Extend existing waterfall and retain stream.



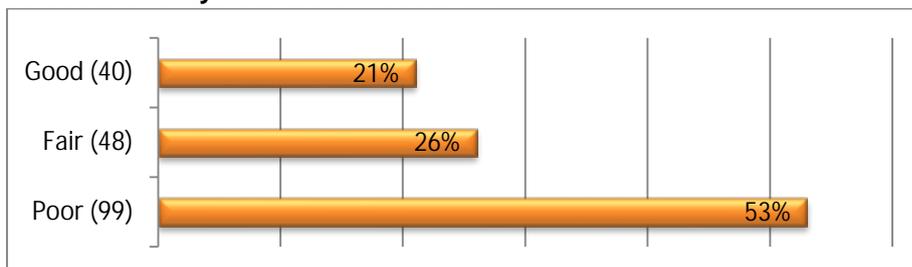
Fresh landscape and omit water feature.



Rill Water feature.

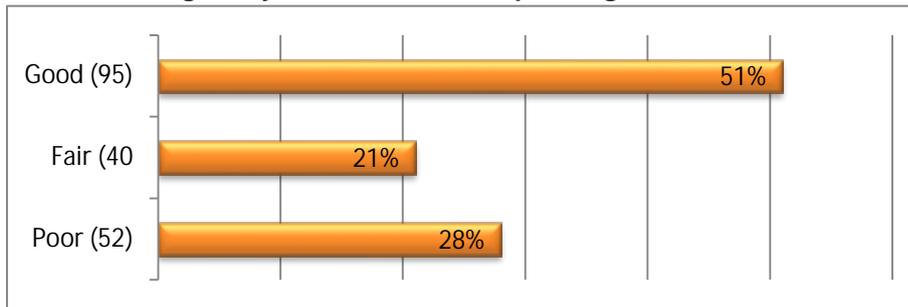


Curved archway water curtain feature.

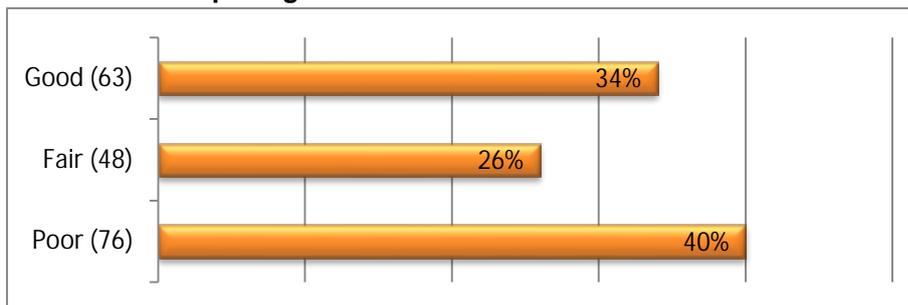


CENTRAL AREA

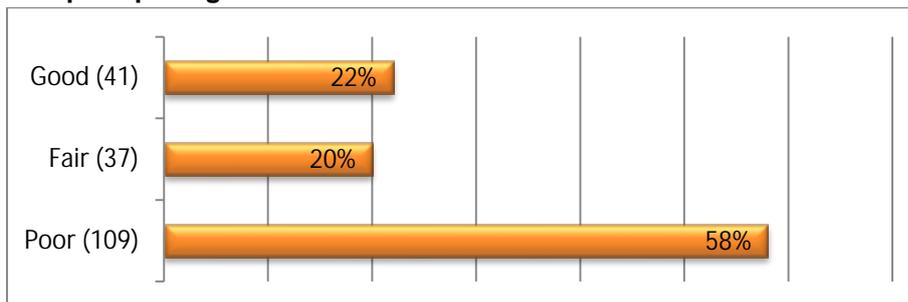
Retain existing 'Fairy Wood' and raised planting bed



Circular feature paving.

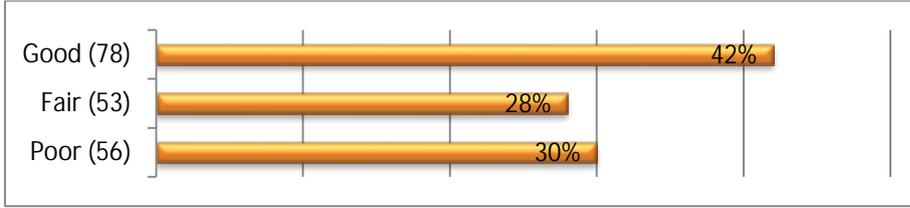


Compass paving feature.

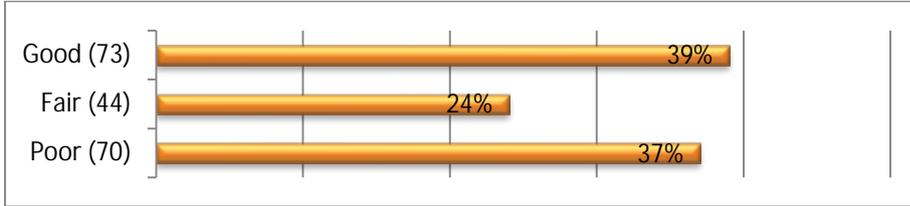


OTHER FEATURES

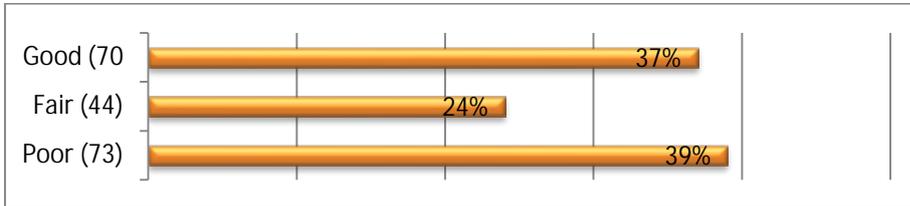
A. Stack Lighting.



B. West Street Lettering.



C. Insert text paving.



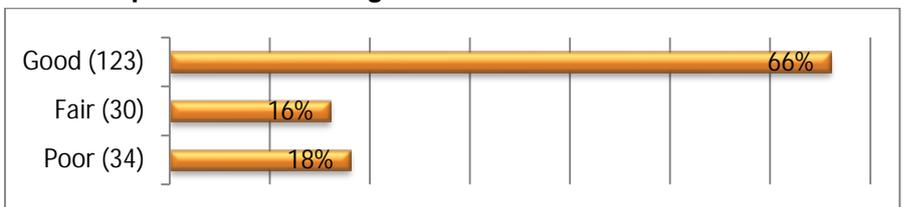
D. Covered events area.



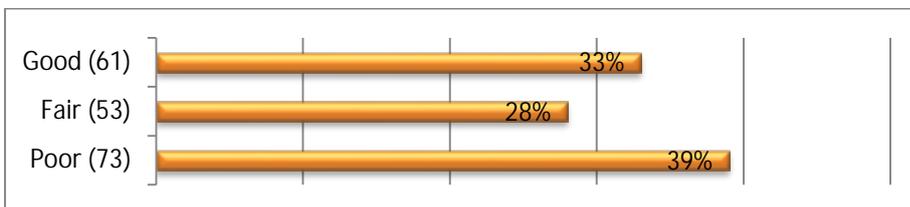
E. Trees in planters or vertical elements.



F. Raised planter with seating.



G. Raised Planters.



Summary of Questionnaire Comments

104 made one or more comments, which are summarised below:

Improving the Bishopric:

- Leave alone, improve paving and lighting, keep clean, keep it maintained 18
- Improve Albion Way crossing with either, green man signal or 2 stage crossing 15
- Improved connectivity and access to JL@H either bridge, underpass or footways 10
- More suitable seating for all across the Bishopric 9
- Retain the existing trees, more greening, keep tree barrier to Albion Way 8
- Open up the Bishopric, less clutter remove tree barrier 7
- Replace fairy wood with art/sculpture 7
- Improve Bishopric/Freshwater Parade (KFC) area and address parking issues 7
- Improve Bishopric lighting 6
- Waste of money spend on something else 6
- Keep it simple, keep it stylish, keep it small 5
- No HORSHAM lettering 5
- Sketch 1 'Continue West Street Paving the best option 5
- Include cycleway, north south & east west across Bishopric pedestrian area 4
- Keep the 'fairy wood' feature 4
- Simple design lines no fancy curves, less water features, better maintenance 4
- Façade of cinema not appropriate with the area 4
- Consider disabled access, no steps 3
- Extend works north south to include St Johns Church and bus station areas 2
- Events area 2
- Keep Wilkinson 2

Other Items:

- Retain Market Town design across the town as it currently looks disjointed 7
- No new cinema 3
- More special event weekends or markets 2
- Improve the Forum paving and drainage 2
- Cycle path along Guildford Road from Merryfield Drive to Bishopric/Albion Way 2
- Retain Horsham theme don't make it like any other town 2
- Encourage large retailers 2
- Good exhibition 2
- More directional wayfinding, better connectivity across the town 1
- Improve Springfield Road area north of Bishopric 1
- Better public transport, rail, bus, and connections to Park & Ride site 1
- Better CCTV across the town 1
- More toilets and better maintenance 1
- Deliveries to the Co-op at old Tanbridge garage site needs reviewing 1
- Provide land for more doctors, dentist, primary schools 1
- Nightclub for young people 1
- Petrol station on west side of town 1
- Improve Queen Street and the iron bridge 1
- Swan Walk needs to be remodelled in the Bishopric area 1
- Need a McDonalds in town centre 1
- Reduce width of Albion Way, or make it one way 1
- Improve parking across the town and reduce charges 1
- Clean /sweep the town beyond the centre 1
- Cinema would be good for the area 1

APPENDIX C: Horsham Town Centre Vision Statement - Representations and Recommended Responses

Please note: If a hard copy is required then the document it is best printed at A3 size for legibility and comprises 28 pages.

Organisation	Comments	Recommended Council Response
	AVIVA Life & Pensions UK Ltd	
Ref.		
1.1	Aviva welcomes the preparation of the Town Centre Vision to guide the development and enhancement of the town centre and encourage discussions and proposals for future development opportunities in Horsham. As a key actor in the town centre, Aviva is keen to work with the Council to enhance the competitiveness of Horsham town centre within the wider retail market, whilst also aiding the Council in meeting its aspirations for the future development of the town centre.	Noted and agree.
1.2	Town centres and shopping habits are changing significantly with competition from out-of-town facilities and the growth in internet shopping. In order to compete, greater emphasis needs to be placed on the creation of enhanced shopping experiences through the creation of retail and leisure destinations. It is considered that the Town Centre Vision will be a vital document in achieving this in Horsham.	Noted and agree.
1.3	Accordingly, Aviva supports the 'Strategic Direction' of delivering a strengthened retail and leisure offering by providing a diverse mix of uses in order to create activity and excitement in the town centre. Aviva is committed to investing in Swan Walk Shopping Centre in line with the Council's strategic direction to enhance the Shopping Centre and the wider Horsham town centre.	Support noted.
1.4	Baseline Review: Aviva is pleased to note that Swan Walk is identified as a key development opportunity area in the 'Retail Guidance', and supports the aim to increase the mix of large and small retail units. In addition, the encouragement of the development of leisure and cultural facilities is welcomed. However, it is also noted that the 'Leisure and Cultural Guidance' identifies that: "Proposals that enhance the restaurant offer and night time economy are encouraged and should be concentrated on, but not limited to, the 'Quarter'".	Support noted.
1.5	Whilst Aviva supports the enhancement of the restaurant offer and night time economy, it is considered that restaurant and leisure uses play an increasingly important complementary role within town centres to retail use. Accordingly, it is considered that the 'guidance' should also specifically encourage restaurant and leisure use within the 'retail core' including Swan Walk shopping centre. This would assist creating a leisure destination and enhancing the diversity and competitiveness of the town centre in the face of increasing competition from internet shopping.	Agree. ADD after paragraph 6.38 and renumber 6.39: <i>There may be further opportunities to enhance the role of Swan Walk as a retail and leisure destination by encouraging complimentary restaurant and other leisure uses so enhancing the diversity and competitiveness of the town centre. While supportive of a diverse offer this should not be at the expense of Swan Walk's primary function as a comparative shopping destination.</i>
1.6	With regards to the SWOT Analysis , Aviva strongly supports the acknowledgement of the on-going investment in Swan Walk as an opportunity. In addition, it is noted that the town centre's comparison retail offer is considered a strength. Aviva considers that Swan Walk itself should also be recognised within the text as a strength, given its strategic location and importance to Horsham. This identification reflects the results of the Pedestrian Markets Research Services Survey Work to inform the Horsham Town Retail & Leisure Study 2017, which identified that the majority of the footfall for the town centre occurs around Swan Walk, West Street and the Forum.	Agree. Section 4 SWOT Analysis Retail bullet points - ADD: <i>Swan Walk is a key town centre retail asset given its strategic location, size and varied retail offer with overall footfall generated benefitting the wider town centre shopping experience.</i>
1.7	Opportunity Areas and Key Development Sites: Aviva recognises and welcomes that the western end of Swan Walk is included within the identified 'Freshwater Parade, Bishopric, Springfield Road and Worthing Road North Opportunity Area' and 'Albery House/Western End of Swan Walk' town centre key development site. We note that reference is made to the redevelopment scheme at Albery House for leisure and restaurant uses at paragraphs 6.34 and 6.35 and welcome the recognition of the benefit of this to the town centre. By way of update, planning permission was granted in February 2017. The last sentence of paragraph 6.34 should therefore be updated accordingly. We also note that future potential for the redevelopment or extension of Swan Walk more widely is considered at paragraph 6.38. We confirm that Aviva will monitor for such potential as part of their asset management function. We would be interested in understanding the basis on which the Vision concludes that there are concerns regarding viability for this form of development. We would welcome further discussion on this to ensure that the plan is positively prepared.	Support noted. Para. 6.34: DELETE: <i>The application is yet to be determined but Council planning officers have recommended approval.</i> Note and welcome further discussion on potential development opportunities.
1.8	Given that Swan Walk is a key asset in the town centre, the shopping centre as a whole should be recognised as an opportunity area to support future enhancement and improvement schemes at the site. This approach would be in line with the 'Retail Guidance' which identifies Swan Walk as an opportunity area and the recognition of the strength of Swan Walk as a focal point in the town centre is shown by the high footfall numbers found in and around the shopping centre as set out in Para. 5.16. Moreover, it would provide a positive policy basis for the enhancement of the shopping centre which would assist in responding to the threat of the growth of competing centres, such as the Westfield development in Croydon, and the rise of internet shopping. This opportunity area should encourage the enhancement of the shopping centre and the provision of new retail, leisure and restaurant floorspace to complement the existing retail offer and support the vitality and viability of the shopping centre. In turn this would support the wider competitiveness, vitality and viability of the town centre in accordance with NPPF Para. 23 and the Horsham District Planning Framework 2015 (Policy 12).	Noted. The western end of Swan Walk comprising Albery House together with the Bishopric, Springfield Road, Worthing Road and Freshwater Parade is recognised as an Opportunity Area. Swan Walk is also separately identified as the Retail Core along with West Street. A reference to complimentary uses will be included at paragraph 6.39 as described above.
1.9	We also note that opportunity areas and key development sites have been identified within the town centre boundary for potential retail development but outside the identified 'retail core'. It is important for the Council to consider the impact of development in these areas on the 'Primary Shopping Area' and 'Primary Retail Frontage' to ensure that new development is well connected with the existing offer and supports the viability and the vitality of the town centre as a whole.	Noted and agree. The Vision proposes: to 'Develop a 'holistic' town centre public realm strategy that addresses: <ul style="list-style-type: none"> • Character spaces (such The Carfax) • Linkages, connectivity and movement between spaces • Wayfinding and signage • Development and design guide • Public realm materials and street furniture palette • Gateways, pedestrian crossings and underpasses • Public art
1.10	Aviva supports the Horsham Town Centre Vision in the context of creating an enhanced, diverse and competitive retail and leisure environment that sets out to compete with the changing behaviours of the retail industry, such as online shopping, and the growth of competing centres. Swan Walk is a strategic asset both in its location and its current and prospective retail offering. The recognition of Swan Walk as an opportunity area is therefore strongly encouraged to strengthen the retail and leisure offer in line with the Council's strategic direction and enhance the competitiveness of the town centre.	Noted. The western end of Swan Walk comprising Albery House together with the Bishopric, Springfield Road, Worthing Road and Freshwater Parade is recognised as an Opportunity Area. Swan Walk is separately identified as part of the Retail Core along with West Street.

	Horsham Denne Neighbourhood Council	Recommended Council Response
2.1	Although we agree with most of the views in the report there is very little that is new, surprising or inspiring and there are few solutions to existing problems. There are some proposals that seem more like a wish list than actual possibilities. The consultants seem to be unaware of work being done by other groups e.g. Horsham Visitor Economy Partnership (see 5.4-5.6, 5.43) or on-going projects such as the Riverside Walk and upgrading of the Remembrance Gardens (see 7.50, 7.53).	Qualified support is welcomed. The work of the Horsham Visitor Economy Partnership is acknowledged in the Vision Delivery Schedule: <i>Promote image and identity: Develop a tourism and marketing strategy for Horsham and Town Centre including options for extending public Wi-Fi.</i>
2.2	It is disappointing that the Hurst Road area occupied by public services has been excluded. Any redevelopment in this area could drastically affect plans for the town centre as it could provide many of the facilities proposed for instance hotels and in The Forum area medical facilities / residential. Plans are already in existence for Pirie's Place / Swan Walk / Riverside Walk / Remembrance Gardens	The remit of the Vision is to focus on the town centre and this has been made clear in the Stakeholder Workshops, individual meetings and consultation exercises.
2.3	HDNC acknowledges the problems caused by permitted development regulations resulting in the loss of commercial facilities. There is a need to encourage more workers into the town centre to improve the weekday retail economy. The proposal for facilities for homeworkers / open shared space should be encouraged in buildings above retail premises. (See The Office Market 3.18)	Noted and agree.
2.4	Housing: 5.39 Need affordable starter homes for young families – not just apartments	Noted and agree.
2.5	Hotel Market: 3.23 / 5.40 No mention of approved application for Pirie's Place Premier Inn (Mentioned on p19 in SWOT analysis)	Vision Para 6.15 refers to planning permission 15 March 2017
2.6	Image & Identity: p23. Agree with threat that Horsham could be viewed time warped and dull in just a few years.	Noted.
2.7	Town Centre Gateways: Gateways are very important for first impressions and to reinforce the character of the town. There could be some quick fixes that would improve the image of the town such as improving the subways (North Street, Railway and Albion Way. A welcoming image is lacking in both street scene and signage at the gateways into Horsham. HDC and WSCC should work together to declutter highways signage. 5.11 Agree that more could be done to improve this access through Springfield Road 5.12 Agree that both crossings could be improved – subway and traffic signalled crossing 5.13 No mention of the Railway and North Street Subways that form an extremely important link connecting the east side to the town centre. This route requires considerable improvement. 5.14 No mention of the dismal appearance of the Iron bridge that is visible to oncoming vehicles and has to be negotiated with care by pedestrians especially in wet weather. 5.22 The disconnection between the John Lewis complex and the town centre was identified by HDNC and others as a problem at the planning application stage but this was ignored and the Town Vision, while acknowledging the problem, does not provide any solutions.	Note support. The Vision proposes: <i>North Street Commercial Quarter – Retain function and develop scheme to enhance public realm between Horsham Station and town centre including subways and Town Centre – East: Progress Queen Street/Iron Bridge improvements, eastern gateway and links to East Street to include supporting retail function and area identity.</i>
2.8	Commercial Quarter: 5.24-25. 6.7-8 No mention of need to maintain the existing building line to preserve the green approach to the town centre.	Agree but this is a detailed planning matter for consideration in the event of any development proposals.
2.9	Support New Community Infrastructure: 5.41 No mention of Drill Hall which has potential for greater community use.	Noted. The Council advertises the facility on its 'Rooms for Hire' section of the Council's main website. https://www.horsham.gov.uk/leisurepages/Leisure/other-leisure-services/rooms-for-hire
2.10	Enhance Access and Movement: 5.42 Car Parks should be visually attractive as well as functional – HDNC has previously suggested there is an opportunity to redevelop Pirie's Place with shops / restaurants at street level and parking above / below.	Noted. The Council is currently progressing options to demolish and replace Piries Car Park with a more attractive and accessible facility and to address forecast car parking demand over the next 10 years.
2.11	Evolving Image and Economy: 5.44 HDNC agrees that improved wayfinding and signage is required and considers this could achieve a relatively inexpensive and quick result.	Support noted.
2.12	Blackhorse Way: 6.2 – 6.4 HDNC agrees with the proposals and considers the prevailing attitude that this is just a service road should be changed as it could be made considerably more attractive 6.48 Should this read it may be possible to restrict traffic east of the car park? If the road could be restricted to one-way traffic and car parking outside buildings banned there is an opportunity to narrow the road and provide a proper pavement. Then it should also be possible to create screens around the refuse bins and introduce some landscaping. (See 7.22)	Support and comments noted.
2.13	Freshwater Parade / Alberty House: 6.9 The map is incorrect and does not show the location of Freshwater Parade 6.10 and 7.64 The addition of an additional crossing over Albion Way on the north side of The Bishopric had been suggested by HDNC several years ago to encourage a wider spread of footfall. We would be pleased to see early implementation of this proposal. 7.62 Please note, as requested by HDNC, that the trees have recently been pruned and now allow a clear view into the town centre from the west. 6.13 HDNC agrees that Springfield Road has no attractive linkage to the town centre. Do we have to wait for the Swan Walk redevelopment before any changes can be made?	Noted. The Vision at 9.5 proposes: Bishopric (1) Eastern area (Albion Way-West Street, including Springfield Rd and Worthing Rd axis): Develop a detailed scheme to improve the public realm and increase connectivity to John Lewis at Home and Waitrose. Bishopric (2) – Western area (Albion Way-Rushams Rd): Progress a detailed scheme to enhance public realm, western gateway and support retail function.
2.14	River Arun Corridor: 6.24 The Office Outlet / Curry's area could create a more attractive gateway into the town if there was retail / residential on the street frontage and the car park hidden behind.	Noted.
2.15	Royal Sun Alliance and Station Car Parks: 6.25 The existing Station Car Park is more than well used, it is full to capacity and it is obvious that demand will grow with additional housing both in the town centre and on the periphery. 6.26 -29 Increasing the capacity of all surface car parks with additional decks should be considered. Public use of the many car parks in the town occupied by businesses (not only RSA) should be considered in the evenings and weekends.	Noted and agree. The Vision's Delivery Schedule at section 9.5 proposes: ' <i>Horsham Station/Royal Sun Alliance car parks – Explore options and develop schemes to increase parking capacity and potential for additional residential provision and explore options for public use of car park</i> '. The Council will work with landowners to assess future potential for additional parking and/or residential development. It should be noted that the two sites are constrained and the impact of any development will need to be carefully assessed in relation to any impacts on neighbouring properties, open space and the local road network. Any proposals coming forward would be fully consulted on in due course.

2.16	Other Potential Interventions: 6.30 See also 5.44, 7.69 and 7.71 <ul style="list-style-type: none"> • High standards for advertising signage including fascias / hanging signs /A boards should be strictly enforced to achieve a cohesive appearance. Similarly illuminated signage should be controlled. • Horsham should seek to be in the forefront of digital technology and provide free Wi-Fi in the town centre and Horsham Park. 	Noted.
2.17	Town Centre Key Development Sites: 6.34 The last sentence indicates that the consultant is unaware that planning permission was granted to redevelop Swan Walk some months ago.	Agree. DELETE 'The application is yet to be determined but Council planning officers have recommended approval'.
2.18	Key Development Sites: 7.3 -7.13 This is the first section in the document that mentions 4 phases of development; therefore it is impossible to know what is meant by the phases or to make any sense of the entire section.	Agree. AMEND to include <i>Phasing Plan</i> after paragraph 6.47.
2.19	<ol style="list-style-type: none"> 1. Horsham Denne Neighbourhood Council was approached by the Cycle Forum (after the consultation period had closed) asking us to support their response to the Horsham Town Centre Vision Statement. This matter was raised again by the Cycle Forum at the CLC meeting on Monday, therefore it seems appropriate to inform you about the opinion of HDNC. 2. We fully support the need for improved facilities for cyclists, where practical; & believe that there should be much closer co-operation between HDC & WSCC to establish the best possible routes. 3. HDNC supports improved cycle infrastructure from the gateways to the Town Centre & the John Lewis complex, as well as additional cycle parking spaces on the perimeter of the Town Centre. However we do not agree with the specific routes within the town centre proposed by the Cycle Forum & they are already aware of our opinion. 4. We believe that pedestrians should have precedence in the Town Centre, therefore Pirie's Place & the East Street / West Street / Bishopric route should be cycle-free as far as Albion Way. We would not support cycle paths traversing the Lynd Cross area (North/South) as this should be the attractive focal point of any landscaping scheme. 5. There was also strong opposition from residents & members present at the last HDNC meeting to contraflow cycle paths, although we realise these may sometimes be necessary. 	Support for cycling infrastructure, as qualified, is noted. As the Vision states in Section 9 we are committed to developing, as part of an overall Delivery Schedule, a Local Walking and Cycling Infrastructure Plan (LCWIP) working with Denne Neighbourhood Council, HDCF and the County Council, building on the successful Cycling Summit held recently. It needs to be acknowledged that the projects listed in the Delivery Schedule are complex, detailed and will require appropriate resourcing to develop and implement. It is noted that not all proposals submitted by the HDCF for cycling infrastructure would necessarily be supported. There is a need to develop detailed proposals and fully consult in due course to reach agreement on priorities and preferences involving all stakeholders.
Horsham District Cycling Forum		Recommended Council Response
	Main Issues Response	
3.1	<p>1. Overview Response: This vision offers nothing for cycling or meaningful improvements. This document lacks the depth or vision to see how Horsham should travel and live. The Vision should have been an interesting, challenging and ambitious approach to how develop Horsham and the town centre, how to reach it by cycle, how to build a network of cycle routes how to cross the dual carriageways to reach the centre, how to reach the shops, how to get around and what the future holds for the town and its residents. The document hints at possible cycle improvements, but is devoid of any vision for cycling. Instead the car is regarded as the only credible means of transport into Horsham. This "four wheels good, two wheel bad" needs to be challenged. Hiding deep in a document table is Walking and Cycling Strategy as a deliverable. This is an opportunity which needs to be a separate Cycling Strategy, because the use patterns are usually very different from walking, although both face the common problems of car orientated travel. The potential for cycling in Horsham and West Sussex is enviable with possibilities to dramatically increase cycle usage through a network of routes into and around Horsham. Add the potential for electric bikes on a wider scale and this Vision should be of a society, comfortable with cycle usage. There should be good direct and safe access from new developments north and west of Horsham, cycle access to leisure and retail, access to public transport by cycle, as well as walk and bus, cycle tourism. These should form a natural part of development. The Vision should reflect this potential.</p>	Disagree. The Council is committed to the development of a Local Cycling and Walking Investment Plan (LCWIP) as proposed in <i>Section 9.5 of the Vision: 'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'</i> It should be acknowledged that each delivery project is a major and detailed area of work in itself. What the draft 'Vision' establishes, following the baseline analysis, exhibition and consultation is a broad consensus on the Strategic Directions and the key Opportunity Areas and Sites. HDCF have been made aware of the remit of the Vision as a strategic document and that it would not address the more detailed aspects of cycling and walking provision at this stage and that this would be a separate exercise requiring additional funding. The Council wishes to build on the Cycling Summits held this year and last and to work with HDCF, the County Council and other key partners to develop a detailed LCWIP that addresses the extensive comments submitted by the Cycling Forum.
3.2	The West Sussex Cycle Strategy should ensure that in Horsham cycling is recognised as important travel modes and therefore part of the transport, to make cycling and walking the natural choice for shorter journeys (such as journeys to school) and to reduce the number of cyclists and pedestrians that are killed or seriously injured on our roads. Yet neither the Cycle Strategy nor its aims are mentioned. We ask that the Vision restates this aim. Curiously, the selected references to Horsham District Planning Framework omit those that cover sustainable transport and cycling. Similarly the relevant policy areas of the National Planning Policy Framework are overlooked. These are policy and should be included in the Vision.	Noted. The Council is committed to the development of a Local Cycling and Walking Investment Plan (LCWIP) as proposed in <i>Section 9.5 of the Vision: 'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'</i>
3.3	The vision from the Horsham Cycle Summit in 2017 is that people want cycling to be a regular and easy mode of transport for all ages that gives direct and safe access to work, entertainment and retail. More cycling eases car parking costs and pressures, so offsetting investment costs. Cycling requires only modest investment to plan a full network of cycle-friendly routes that allow people of all ages and abilities to cycle anywhere for any purpose; to invest and actively seek the funding; to implement the network and invest between 5 - 10% of the local transport budget in cycling. This would build the network using the most up-to-date high quality design standards. We ask that the Vision aims for this. Poor infrastructure is at the core of the problem. A recent Highways Agency Interim Advice Note 195 states that current cycle levels are not a good indication of potential future demand so creation of good routes stimulate demand. Designers should ensure that they include the potential for future growth. This should apply to all new infrastructure. We ask that the Vision restates this requirement.	Agree. This will form part of the LCWIP and as explained above.

3.4	<p>An effective Vision needs to include and should form part of a Cycle Plan for Horsham: • Commitment to follow WSCC, HDPF and NPPF as targets to increase cycling and cycle facilities around Horsham, • Cycling to be considered as a solution to reducing car dependency, as a contributor to making Horsham a better place to access, live and work, • Better, safer, direct cycle routes designed and implemented into the town centre, • Physical barriers overcome, such as Albion Way dual carriage way so access is improved for all cyclists, pedestrians and those not in cars, • Better cycle routes around town to form a network, e.g. across Lynd Cross, Bishopric, Carfax and Piries Place, • More cycle facilities for safe and secure parking once in Horsham town centre, • A north-south link marked out across Lynd Cross. This could form a green link across Horsham for all non-car users, from Horsham Park to the Cricketfield, • Improvement of cycle provision in developments by involving of Cycle Forum in pre-planning applications to encourage excellent cycle provision in designs, • Excellent cycle facilities and routes in any developments such as Sainsbury's car park, residential by station, Office Outlet and other identified site. • A cycling Supplementary Planning Document that directs strategic planning and development. • The Public realm assessment should include cycle routes. • A separate Cycling Strategy with a review panel to develop and implement cycling policy through Horsham and its new development areas.</p>	<p>Noted. The Council is committed to the development of a Local Cycling and Walking Investment Plan (LCWIP) as proposed in <i>Section 9.5 of the Vision: 'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'</i> The Council notes and welcomes the many positive suggestions made which will be considered and taken forward in the development of an LCWIP working with the HDCF and other key stakeholders.</p>
3.5	<p>2.2 The Vision must reiterate compliance with National Planning Policy Framework (NPPF) Core planning principles: 4. Promoting sustainable transport. (full details in next section) 2.2 Add and take into account the important and relevant reference to Interim Advice Note IAN 195/16 cycle traffic and the strategic road network, so not relying on existing demands to indicate potential demand; segregated cycle routes on trunk roads. (full details in next section) 2.2 The Vision must reiterate compliance with all policies of Horsham District Planning Framework (HDPF). (full details in next section) Add and take into account: Include Policy 5 Strategic Policy of Horsham District Planning Framework (HDPF) for sustainable transport. Promotes high quality transport infrastructure which enables excellent pedestrian, cycling, Include Policy 35 Strategic Policy of Horsham District Planning Framework (HDPF): Climate Change Development The use of patterns of development which reduce the need to travel, encourage walking and cycling Include Policy 37 of Horsham District Planning Framework (HDPF): Be designed to encourage walking, cycling, cycle storage and accessibility to sustainable forms of transport These are must be factors in the vision. This is not optional, NPPF is National Policy, IANs are national Policy, HDPF is local policy. It is of concern that these references have been omitted since they are the Council's responsibility for sustainable design. 2.2 Add and take into account the short case study using the Propensity to Cycle Tool to explore cycle commuting potential in West Sussex This is a Department for Transport-funded tool that uses information about current trip lengths and hilliness to identify trips that might be most easily switched to cycling. The result demonstrates using a comparison in a similar Dutch situation that commuter cycle usage alone, could increase from 3% up to 24%. (full details in next section) 2.2 Add and take into account the West Sussex Walking and Cycling Strategy 2016–2026, whose cycling strategy supports the Government target to double levels of cycling by 2025. (details in next section) 2.2 Add references to take into account: West Sussex Sustainability Community Strategy 2008 – 2026 West Sussex Transport plan 2011 – 2026 Feb 2011</p>	<p>Disagree. While the documents referred are important in their own right the Vision is not a statutory planning document. National and regional strategies and guidance will form part of the proposed Local Cycling and Walking Infrastructure Plan that the Vision proposes to develop as part of the Delivery Schedule at section 9.5. It should be noted that any planning proposals will need to be compliant with the National Planning Policy Framework (NPPF) and the Horsham District Planning Framework (HDPF).</p>
3.6	<p>5.9 Improvements are needed at all gateways for cycling 5.22 Cycle Access to the John Lewis development must be improved There is no easy crossing point for pedestrians and cyclists moving between the John Lewis and the rest of the town centre. 5.24 There are no cycle route shown in Commercial Quarter. They exist along North Street and through the Park 5.28 On the keys on all diagrams, why is Traffic reconfiguration considered, pedestrian route improvement considered, but no key line for cycle route improvement? This appears to be excluding the cycle users from improvement 5.31 What is proposed for cycling in Bishopric and Queens Street, as routes and cycle parking? 5.32 Why are there no cycle improvement around Piries Place Copnall Way and Park End</p>	<p>Noted. See above.</p>
3.7	<p>6.6 Cycle access and facilities required for Sainsbury's development. 6.25/6.26 There needs to be better cycle route access under the railway line at North Street 6.31 There needs to be a clearly defined cycle route across Lynd Cross North South from Springfield Road to Worthing Road. 6.48 Blackhorse Way must remain two-way for cyclists so would need a contra flow 6.51 There should be proposals for cycle route around Copnall Way, Piries Place and Park End</p>	<p>Noted. See above.</p>
3.8	<p>7.54 This is valuable comment supported by Horsham District Cycle Forum as part of a comprehensive network of cycle routes north south and east west through town, across or under roads as needed. 7.52 The public realm must include cycle provision. 7.62 Provide a cycle slip lane in the Bishopric 7.64 Albion Way is a barrier to cyclist as well as pedestrians. 8.7 Horsham District Cycle Forum fully supports any interventions that provide cycle paths. The problem is that there are so few. 9.5 Delivery Schedule item 2. Horsham District Cycle Forum support the delivery of a Cycling Strategy. The Forum request that it should be a separate document from Walking since needs, routes and patterns are fundamentally different. A combined document would lose each mode's particular requirements. Horsham District Cycle Forum request involvement as a key partner as the brief is being prepared</p>	<p>Noted. See above.</p>
	<p>3. Detailed Issues Response, paragraph by paragraph</p>	

3.9	<p>2.2 Horsham District Cycle Forum has prepared and issued numerous idea and documents to Horsham District Council and it is important that the vision acknowledges the role of the Horsham District Cycle Forum as contributing and improving the proposal and cycling in Horsham.</p> <p>2.2 Add reference to the Case Study using the Propensity to Cycle Tool to explore cycle commuting potential in West Sussex. The PCT is a Department for Transport-funded tool that uses information about current trip lengths and hilliness to identify trips that might be most easily switched to cycling. http://www.westsussexcycle.org.uk/wp-content/uploads/2016/09/W_Sussex_PCT.pdf</p> <p>Figs 2 and 3, show that under a scenario ('Go-Dutch') where Horsham provides such good infrastructure that people ride their bikes as much as Dutch people would for a similar journey length and hilliness, that the commuter cycle mode share in the town centre goes up from around 3% to between 18 and 25%. Non-commuter cyclist would increase at the same time for the same reasons of good network.</p> <p>The use of 'e-bikes' is shown in Fig 4 which takes 'Go Dutch' and adds to it the potential represented by mass use of e-bikes. If cycles themselves become more mainstream, we can anticipate that in hilly and rural areas 'e-bikes' may become very widely used and substantially increase cycling potential. Including 'e-bikes' the potential increase for Horsham rise to over 30%.</p>	<p>Disagree. The Council is committed to the development of a Local Cycling and Walking Investment Plan (LCWIP) as proposed in <i>Section 9.5 of the Vision: 'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'</i> It should be acknowledged that each delivery project is a major and detailed area of work in itself. What the draft 'Vision' establishes, following the baseline analysis, exhibition and consultation is a broad consensus on the Strategic Directions and the key Opportunity Areas and Sites. HDCF have been made aware of the remit of the Vision as a strategic document and that it would not address the more detailed aspects of cycling and walking provision at this stage and that this would be a separate exercise requiring additional funding. The Council wishes to build on the Cycling Summits held this year and last and to work with HDCF, the County Council and other key partners to develop a detailed LCWIP. All detailed comments will be taken into consideration in the development of the LCWIP.</p>
3.10	<p>2.2 Add reference to Interim Advice Note IAN 195/16 Cycle Traffic and The Strategic Road Network:</p> <p>2.1.2 Current levels of demand for cycle trips are not always a good indication of potential future levels of demand. Creation of a comprehensive network of good quality cycle routes has the potential to stimulate demand beyond the incremental change that demand models predict. Designers shall not rely solely on modelled incremental increases relative to current demand for cycle trips, therefore they shall ensure they consider the potential for additional stimulated demand.</p> <p>2.1.1 Where alternative cycle routes away from the SRN cannot be provided, designers shall ensure that cycle networks allow for segregated cycle trips within the corridor of all-purpose trunk roads with speed limits of 40mph or greater. Cycle networks shall also allow for trips crossing the SRN corridor. Cross-corridor schemes, such as those crossing motorways or where NMUs are prohibited, can reduce or eliminate severance which may have otherwise suppressed demand for cycle traffic.</p>	<p>Noted. See above.</p>
3.11	<p>2.2 Add reference to National Planning Policy Framework (NPPF) reference for sustainable transport. These are must be factors in the vision. National Planning Policy Framework March 2012 Core planning principles: 4. Promoting sustainable transport: 17. Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable 29. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. 32. All developments that generate significant amounts of movement and decisions should take account of whether the opportunities for sustainable transport modes have been taken up, give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;</p>	<p>Noted. See above.</p>
3.12	<p>2.2 Add reference to Horsham District Planning Framework (HDPF) covering sustainable transport. These are must be factors in the vision. Policy 5 Strategic Policy: Horsham Town To promote the prosperity of Horsham town.... 4. Promotes high quality transport infrastructure which enables excellent pedestrian, cycling, bus and rail and vehicle accessibility for residents, visitors and business employees... Policy 35 Strategic Policy: Climate Change Development will be supported where it makes a clear contribution...Measures which should be used to mitigate the effects of climate change include..... 4. The use of patterns of development which reduce the need to travel, encourage walking and cycling and include good accessibility to public transport and other forms of sustainable transport; Chapter 3: Spatial Vision and Objectives Policy 37 Sustainable Construction Proposals must seek to improve the sustainability of development. To deliver sustainable design, development should incorporate the following measures 5. Be designed to encourage walking, cycling, cycle storage and accessibility to sustainable forms of transport.</p>	<p>Noted. See above.</p>
3.13	<p>2.2 The Vision must reiterate West Sussex Walking and Cycling Strategy 2016–2026, whose a cycling strategy supports the Government target to double levels of cycling by 2025. Add references:</p> <p>1.1 To clearly state West Sussex County Council's aims and objectives for cycling and walking between 2016 and 2026</p> <ul style="list-style-type: none"> • To determine the Council's priorities for funding reflecting the overall walking and cycling aspirations of the Council • To provide guidance in support of prioritising cycling and walking infrastructure in new development • To provide a framework through which local interest and community groups can make suggestions for the development of cycling and walking improvements <p>Additionally, the Government has recently consulted on its draft Cycling and Walking Investment Strategy (CWIS) and publication of the final document is expected in the summer of 2016. It is our intention that this strategy will support delivery of the CWIS and the Government's aims to:</p> <ul style="list-style-type: none"> • Double levels of cycling by 2025 • Reduce each year the rate of cyclists killed or injured on English roads <p>The West Sussex Walking and Cycling Strategy also supports the West Sussex Transport Plan 2011 – 2026 objectives. This includes four strategies based on the following priorities that guide the County Council's approach to maintaining, managing and investing in transport, and meeting the main objective of improving quality of life for the people of West Sussex:</p> <ul style="list-style-type: none"> • Promoting economic growth • Tackling climate change • Providing access to services, employment and housing • Improving safety, security and health <p>Add Weakness: The Council lacks commitment to Sustainable and Cycle transport so will not seek to break the car orientated transport pattern, which will inevitably lead to greatly increase congestion. This is contrary to NPPF and HDPF policies.</p>	<p>Noted. The Council wishes to build on the Cycling Summits held this year and last and to work with HDCF, the County Council and other key partners to develop a detailed LCWIP. All detailed comments will be taken into consideration in the development of the LCWIP.</p>

3.14	<p>5.9 Gateway 1 (Worthing Road) barely adequate cycle facilities that should be improved</p> <p>5.10 Gateway 2 (Guildford Road) there is no easy cycle access that should be provided</p> <p>5.11 Gateway 3 (Warnham Road direction) - poor cycle facilities and a dead end to cycle lane that needs to be removed</p> <p>5.12 Gateway 4 (London Road) poor cycle access into Medwin Walk</p> <p>5.13 Gateway 5 (North Down bridge) is not pedestrian only. It is shared cycle and pedestrians.</p> <p>5.14 Gateway 6 (Brighton Road) just adequate cycle access but could be improved</p> <p>5.22 Cycle access to John Lewis on the dual carriageway is dangerous and must be improved. The concern and danger was highlighted to Horsham Council during design, yet ignored. Horsham Council remain responsible for resolving this situation.</p> <p>5.22 Correct -- "There is no easy crossing point for pedestrians and cyclists moving between the John Lewis at Home and the rest of the town centre. There is a danger that such provision could lead to a single stop and therefore it is recommended that the Council seeks to enhance linkages between the store and the rest of the town centre."</p>	Noted. See above.
3.15	<p>5.24 No cycle access is shown on the diagram of the "Commercial" Quarter on North Street. There is a cycle lane in both directions along North street, through Horsham Park and across to east Horsham</p> <p>5.26 Cycle route on the diagrams throughout are unclear</p> <p>5.28 Cycle routes are unclear. Improved cycle access is needed into the John Lewis development. It is concern that none is proposed</p> <p>On the keys on all diagrams, why is "Traffic reconfiguration" considered, "pedestrian route improvement" considered, but no key line for cycle route improvement? This appears to be excluding the cycle users from improvement</p> <p>Better cycle routes needed into this development</p> <p>5.3 Why no cycle route improvement</p> <p>5.31 What is proposed for cycling in Bishopric and Queens Street, as routes and cycle parking?</p> <p>5.31/32 Why is the contra flow cycle lane along Copnall Way not shown?</p> <p>5.32 Why is the potential, indeed need for cycle access from Copnall way through to Park place not shown?</p> <p>Why is the cycle route across the Sun Alliance bridge not shown as a cycle route?</p> <p>why is the contra flow cycle lane along Copnall Way not shown?</p> <p>Repeat: On the keys on all diagrams, why is "Traffic reconfiguration" considered, "pedestrian route improvement" considered, but no key line for cycle route improvement? This appears to be excluding the cycle users from improvement</p> <p>5.42 Key issue, make the gateways more pedestrian, public transport and cycle friendly.</p> <p>5.43 Involve Horsham District Cycle Forum</p> <p>6.6 Cycle access to any new Sainsbury's development is essential to limit the reliance on cars.</p> <p>6.13 need cycle routes NS and West from Lynd Cross. Need comprehensive cycle facilities</p>	Noted. See above.
3.16	<p>6.14 need cycle routes and facilities in these proposals for Piries Place as a formal defined route from Copnall Way to Park end and associated facilities.</p> <p>6.19 Fine words but what is the vision?</p> <p>6.22 Good idea, so what is proposed for cycle access</p> <p>6.25/6.26 needs improved cycle access under the railway line</p> <p>bullet 2 - needs improved cycle access</p> <p>6.31-6.38 there is a needs to be a clearly defined cycle route across Lynd Cross North South from Springfield Road to Worthing Road. There is also a route west along the Bishopric which must be included but is not shown</p> <p>6.31 Cycle facilities and defined route is needed North South and West for access, directness and safety so should be shown</p> <p>Any development will need comprehensive cycle routes and facilities, through and to the development as well as parking and storage therein to reduce the need for cars and to meet sustainability standards.</p> <p>6.48 if one way is introduced, it must be two way for cyclists, as West Street is no cycling so there is no alternative East-West cycle route in either direction</p> <p>Horsham District Cycle Forum have offered alternatives</p> <p>6.51 The plan for Piries Place shows no awareness of the need and request for cycle routes. None are even shown on the layout, despite it showing cars and pedestrians. The most worrying omission from this plan is the service vehicle routes from Park End to Copnall Way, mixed with car, pedestrians and cyclists as well as motorized buggies and families with young children. How can this be a competent planning layout with such fundamental omissions</p> <p>6.54 Care must be taken to integrate the scheme into Horsham. see above dedicated cycle route from Copnall Way to park End is needed.</p> <p>6.60 The John Lewis development needs improved cycle access and parking</p> <p>6.61 The link under the railway needs to be a formal cycle route, into North Street and into Horsham Park.</p>	Noted. See above.
3.17	<p>7.2 Horsham District Cycle Forum request to be involved</p> <p>7.23 It is desperately important that Blackhorse way is two way cycling; there is no other East West route.</p> <p>7.54 top idea - cycle routes through town. A comprehensive networks of cycle routes north south and east west through town and across or under roads. To be encourages</p> <p>7.62 needs cycle slip road into Bishopric from Albion Way south carriageway</p> <p>7.64 These roads are equally barriers to cycles as pedestrians so need improved cycle access routes and facilities across these</p> <p>7.65 These roads are equally barriers to cycles as pedestrians so need improved cycle access routes and facilities across these.</p>	Noted. See above.
The Horsham Society	Recommended Council Response	

4.1	<p>1. Summary A Town Vision should be just that; comprehensive, thought provoking, full of ideas often at early stages. It should include imaginative ideas about how residents can live, work, shop and be entertained. This vision should support the image of a vibrant, progressive, historic market town and be capable of being implemented in the years ahead as money and circumstances allow. At the start of the project Horsham Society said that the Vision should aim to create an integrated series of spaces that form a continuous route across the town centre. The vision should reflect the changing appearance and character of the street scene; it should be coherent and beckon public to explore further. So what do we have? The consultants have produced a document that lacks real vision, one that fails to ask questions about the long term development of Horsham, the development of the town centre and how it should be. Instead, the document concentrates on known sites for the short term, from them suggesting a number of “strategic directions” and identified what they call “opportunity areas.” The Vision does propose the development of a Public Realm Strategy, a Cycling Strategy, a Walking Strategy and a Tourism Strategy, all as key projects. . It is important that these are separate documents, each concentrating on either a single mode of transport or a single issue and we expect them to cover many of the issues we highlight. We are generally supportive of the delivery schedule and welcome the intention to start a debate on these questions. It is critical that the key partners are jointly involved in deciding the brief and scope and then in agreeing the outcome of these new strategies. Horsham Society ask that the Vision be more ambitious, tackling the difficult questions of access into town, improvement of the gateways, the crossings of Albion Way, entertainment options, residential ideas for different age groups, education, tourism as well as creating a north to south route, to name a few. Overall, the Vision is lacking in breadth and ambition. The starting point for a Vision for Horsham’s future should encompass three elements: the wider context, the changing demographics, and the topographical area of prime concern in the town itself. These are considered below.</p>	<p>The objective and remit of the Horsham Town Centre Vision is to establish an aspirational, comprehensive and deliverable medium term vision over the next 10-15 years. This has been made clear at the outset and through the Exhibition and survey content. A thorough review of Horsham has been undertaken, including population, social and economic factors, and including an analysis of the town centre’s current strengths, weaknesses and opportunities. Building on this work, the Council has analysed the town centre and identified a number of potential development sites and actions which could strengthen the role and image of the town. While the Council does not own these sites we will work closely with landowners to explore and deliver schemes that benefit the town centre. The Exhibition and consultation carried out in May and June provided the opportunity to express views on the current thinking for the future of the town centre, and the locations and forms of development proposed to help achieve it. The Exhibition and response surveys explored what people felt about: • The town centre’s strengths, weaknesses, opportunities and threats – (SWOT Analysis). • Strategic directions to address current and future issues. • Strategic plans for the Town Centre and Town Centre East. • Opportunity areas and their potential development. • Environmental enhancement of the Bishopric. The survey feedback was supportive of the SWOT analysis and the Strategic Directions. Feedback on key sites showed similar levels of support except Sainsbury's which will not be explored further. The Vision as amended following consultation establishes a broad consensus going forward and should be seen as the start of a continuing conversation and not the end. The Vision proposes a Delivery Schedule of projects that will build on the work done to date and address much of the detailed responses received. It should be acknowledged that each project is a major and detailed area of work in itself. The Council is committed to working with the Horsham Society and other key partners in delivering the various projects.</p>
4.2	<p>2. Horsham in the Wider Context: Horsham is placed between the pressures and opportunities of Crawley and Gatwick to the north, the asset of the Weald and the Downs to the immediate south, and Brighton to the further south. In turn, all are overshadowed by London. Some questions arising from this are:</p> <ul style="list-style-type: none"> • Do we want to keep the Crawley – Horsham green gap? • Is Southwater now part of Horsham? • The aim must be to keep the green buffer of Denne Hill and Tower Hill to the south of Horsham. • Should we resign our remaining industrial ambitions to the wider context of Crawley plus Gatwick? • Are we aiming to profit from proximity to Gatwick by encouraging tourism/ accommodation? • Will we expand tourism in the future by acting as a base for eco-tourism/ international tourism for the Weald and Downs? • Are we trying to act as an outlier educational base for the universities of West Sussex and Brighton? (and Guildford?) • How big an effect and for how much longer is the rising cost of London housing prompting more commuter residents in Horsham? • How is the realm of retailing developing? Have large supermarkets passed their peak? Will e-commerce largely replace them? Will they become show rooms for products which are ordered on-line and delivered to our homes, perhaps by robotic vehicles? From sheds to windows to automatic vans? What might that do to planned car parks and superstores? 	Noted.
4.3	<p>3. Horsham Demographics:</p> <ul style="list-style-type: none"> • Horsham has a increasing proportion of older residents and younger couples. Are we planning for more younger family groups while also accommodating the residential and mobility needs of the elderly? • How will the future likely distribution of our population influence the amount of residential areas we have, how much retail and how much recreational? • Horsham is no longer the clichéd ‘Historic Market Town’ but predominantly a residential/retail/recreational town. Fewer people work in the town, especially with the loss of Novartis and the more modest activities of Royal Sun Alliance. Horsham is rapidly becoming less a stand-alone town, more an integral part of the north/south axis of London/Gatwick/Crawley/ Weald/ Downs/ Brighton. • If we draw in more younger people we need schools and medical facilities. • Horsham has an ageing population, and what does that imply for transport and communication? More installed capacity for electronics and more combined cycle routes for joint use by families and by mobility scooters? • Does the concept of cycle/pedestrian/mobility scooter use suggest more multi-purpose routes not orientated around the car? How will the projected users influence the direction of the routes, perhaps for example along, the river, and deep into town? • Is the continuous increase in car parking a long term solution or even a need, or should alternative modes be encouraged, e.g. walking, cycling, more and better public transport? • What are the possibilities for linking in the satellite residential areas of north Horsham with the rest of the town? Should we consider the inner town possible routes of a yet-to-be-built connection to north Horsham? 	Noted. The Horsham District Planning Framework 2015 and relevant Neighbourhood Plans address many of these issues while the 'Vision' Delivery Schedule will address more detailed considerations through the proposed Local Walking and Cycling Infrastructure Plan and Public Realm Strategy for example.

4.4	<p>4. Horsham Topography:</p> <ul style="list-style-type: none"> • For too long the temptation has been to concentrate solely upon the central area of West St/ East St/ Carfax simply because it's there. • We advocate taking in a wider circle from the cricket ground in the south, round to Queen St in the east, up North St. to the station, westwards along Hurst Rd. and down North Parade to the Bishopric and back to the cricket grounds. • The existing east/west axis could be replaced by thinking in terms of the town centre as circling the park and emphasising the entry points of Queen St, the station, and Worthing Rd. • A clear North to South corridor access for pedestrian, cyclist and mobility scooter needs to be established to match the East to West thinking • The provision of public infrastructure with this framework in mind could be done successively over time with the aim of ultimately linking all the spaces into a harmonious whole, so that, for example, the station would become a central access point to the town rather than the distant adjunct it is now. • Horsham Society have previously advocated that the spaces and routes across the town centre should have coordinated finishes from the Lynd Cross, along West Street to the Carfax, linking to East Street, into Horsham Park and across to the future Hurst Road development. Each space or area should have its own distinct character that reflects its use, heritage and highlights, but the finishes should coordinate from one space to the next. There should be consistency in the street furniture and signage to create a consistent and interesting journey across the centre of Horsham. The section "Evolving image and identity" and the proposal for a "public realm strategy" is welcome. • Hurst Road, with its redevelopment potential, needs to be brought into the Vision to tackle, even in general terms, the thorny problem of linkage with the town centre without destroying the tranquillity of the Park. 	<p>Noted. The remit of the Vision has been made clear at the start and through subsequent consultation events. However, and a map of the Town Centre Area will be INSERTED after Paragraph 1.2. <u><i>INSERT New paragraph 1.5 will detailing the Town Centre area under consideration as follows: 1.5 For the purposes of this report the Town Centre is the area bounded by Albion Way, Parkway, East Street, Queen Street, Denne Road, the River Arun and Freshwater Parade/Bishopric.</i></u> The detailed comments are welcomed and will be considered as part of the development of a Public Realm Strategy in due course. It should be acknowledged that each project is a major and detailed area of work in itself. The Council is committed to working with the Horsham Society and other key partners in developing and delivering the various projects including a Public Realm Strategy.</p>
4.5	<p>5. Broad suggestions for the area delineated.</p> <ul style="list-style-type: none"> • Cricket Ground: The access to the town proper could be improved by more green pathways as mentioned in the vision document. Several tree lined multipurpose paths could run from the river at Worthing Rd up past Lynd Cross to the park. Improved access across Albion Way is needed. A second pathway could run along the river bank past the groundsman's cottages to turn up the Causeway. If the cricket ground were sanctioned for county cricket and similar regular events then binding it closer to the town would increase footfall. Should more use of the Cricketfield for entertainment events be encouraged? • Horsham Park Does Horsham need an entertainment ground in the park? Should it be by Park House or be closer to the pond area? Horsham Society does not support incursions into Horsham Park however it does request a vision of what the park should provide, what works, if any, may be required, how it is serviced and where the parking is provided; all for public discussion. The haphazard approach to the Ice Rink demonstrates this need for a plan. • Recycling Are more facilities needed for recycling in the town centre? Bottle banks etc for visitors and shoppers? • Piries Place If, or when, the Piries Place car park is to be redeveloped that what does Horsham need long term? Are more car spaces only a short term answer to a short term problem? How will this affect the transport arrangements in the area, where are the access points? Should public transport be invested in and improved at the same time and to the same degree? 	<p>Noted. The remit of the Vision has been made clear at the start and through subsequent consultation events. The detailed comments are welcomed and will be considered as part of the development of a Public Realm Strategy in due course. The Horsham Car Parking Review 2016, provided as a background document, looks at parking demand in the light of projected growth up until 2031. A successful town centre will need to make provision for all modes of transport. The report provides a number of estimates of future parking demand in response to differing forecasts. The Council is proposing to replace Piries Place car park with a more accessible, larger and attractive facility to support the town's future.</p>
4.6	<ul style="list-style-type: none"> • Queen St: The stretch between East St past the Iron Bridge and out as far as Queensway or New St badly needs refurbishment. Some uniform street lighting and paving would bind it more into the town, making the area visually linked with East/West St It needs an entry marker at, say, New St, a form of Dorking gate announcing that this is central Horsham. One small indication could be perhaps the narrowing of the pavement on the south side of Queen St east of the Iron Bridge with limited stop-over parking to generate more custom for this depressed area. Uniform frontages and improved presentation would complement the street furniture improvements. • North St: This is central to expanding the town from its east/west constriction. More residential areas are being built, converting some present commercial units; more retail/residential could be supplied at the car park behind the old telephone exchange building. This area provides car parking at present which should continue could instead be increased to multi-level as an alternative. The street scene is enhanced by old buildings such as North Chapel. The area around the station would benefit from some retail units on the present bus/stop taxi rank area, some of which could use instead the car park to the immediate north of the station. There are opportunities yet constraints here so this area needs a development plan that includes routes into the town centre and improvement under the railway line and into Horsham Park. This would link with any development on the car parks to the east of the railway. The car park area to the east now used by RSA staff and running along New St could be developed into residential/ car park as outlined in the vision document. A green island along the centre of North St, at the cost of narrowing it a little, would provide an introduction to the park area of Horsham. An area of integrated traffic/pedestrian use extending down to The Capitol would slow traffic down on entry and provide a semi-piazza appearance at the station. Should the west side of North St. be enlivened by converting Park House into a boutique hotel? The exterior is worth keeping, although the interior has been altered. Some part of the accommodation might need to be built on the present car park to the far north of Park House to make it commercially viable. There are many constraints as it is important that this does not encroach onto Horsham Park, compliments Park House as well as contributing and improving the street scene of North Street. 	<p>Comments are welcomed. The Vision proposes as at Section 9.5 a number projects including Queen Street and North Street working with the Horsham Society and other key partners.</p>

4.7	<ul style="list-style-type: none"> • Hurst Rd: There are several good sized sites on this road which are open to re-development, including the fire station and the police station. There is an opportunity to develop these sites in conjunction with those in North St and the car parks in New St while remembering that the catchment area for retail development would include Horsham Gates and Century House. Attention should be paid to how to open up access to the park from these developments, particularly along the present narrow path which runs beside the hospital. The developments should be kept low rise to keep the uninterrupted view of the skyline in the park and the development should be in keeping with the theme of complementing the park and using it as a focal point for the town. Types of development might include medical, residential or high tech offices while avoiding light industrial or warehousing. There are a number of older cottages/houses along Hurst Rd which give it a mature atmosphere and they add to the street scene. • Albion Way: This is a problem area because it serves mainly to conduct through traffic round the centre of the town, it divides residents from the town and park and it slices the Bishopric off from West St. The street scene is dominated by the ugly backs of the M&S car park. It could be embraced by a wall of small flats, much as Burton Court does for the Piries Place car park, with a terraced area stretching over the highway to be planted and to protect the flats from noise and pollution. From this terrace a spiralling ramp could cross Albion Way and give entry to the park by the roundabout at Madeira Avenue. An enhanced green ramped access from Medwin Walk would join the park to the town and improve access well beyond the present narrow underpass. Access across, under or over Albion Way is needed, the current crossings are inadequate as traffic flows grow. These improved crossings need to accommodate pedestrians, families, mobility scooters and cyclist. Should Albion Way be a single carriageway, becoming a boulevard allowing pedestrian and cycle routes alongside amongst trees? It has been considered before but not progressed, however it would ease the access from the town to John Lewis. 	Noted. See above responses.
4.8	<ul style="list-style-type: none"> • Albion Way/Bishopric: The segment of Albion Way from the Bishopric to the Worthing Rd roundabout is a difficult barrier cutting off the Waitrose/John Lewis site from the town. The second pedestrian crossing proposed may be a partial solution but it needs an imaginative solution to solve the access and transport issues and will likely involve major infrastructure. Horsham District Council should present options and strategic plans involving all sites in this zone. • John Lewis / Currys How is this to considered in the vision? If Currys/Office Outlet is to redeveloped, then what to? Retail or residential? Is there an opportunity to overcome the access problem to John Lewis, as it is not addressed in the document? If a further raised deck or podium is provided, does this give an opportunity for pedestrian access towards the forum, a pedestrian deck over Albion Way perhaps linking to the Forum? Can Albion Way be sunk to allow at grade pedestrian access. If Sainsbury's car park is redeveloped then what does the town need there? Retail, entertainment or residential? Would this enable access for a North South non-car access corridor towards the Cricketfield. This whole area of Horsham needs a comprehensive integrated vision, not piecemeal developments. 	Noted. See above responses.
4.9	<ul style="list-style-type: none"> • Sainsbury's: This is a key site that has so many possibilities and links to other sites, but also constraints, that it should be central to public discussions as to what use is appropriate and what how it could benefit Horsham. The future of this site may depend on the evolution of the retail industry. If e-commerce makes supermarkets redundant as we know them to-day then this is a good site for high density residential building. Something more like the multi-layers of Potter's Place rather than the row of small town houses in the vision document is required. Some of this intense infill could be on a multi-storey car park and could rise to the pedestrian level of the Forum. The present piazza in front of the Forum should be left, to enjoy the warm sunny south facing aspect. • Lynd Cross/bus station/Blackhorse Way: This area will have to be refurbished once the multiplex is finished in West St. A suggestion is to pave the whole area uniformly without any traffic barriers and use it as an integrated space with vehicles and people moving at will across the open space. Blackhorse Way could be one way eastwards (with cycle contraflow) which would give enough space to screen off the bin area and still leave room for deliveries and waste disposal. 	Options to relocate the main store westwards facing Worthing Road with parking underground to free up space for retail and residential use was consulted on but not supported overall. There was significant support for addressing the issues facing Blackhorse Way and this will be the subject of further detailed projects as part of the Vision's Delivery Schedule.
4.10	<ul style="list-style-type: none"> • West St/ East St/Carfax These successful areas could be linked by public furniture -- standard lighting, uniform paving. They should invite users to walk through to the Carfax and on up to the Park via Chart Way or to the Albion ramp. It should be natural to walk from East Street at Denne Rd on towards the Iron Bridge to Queen St. • Transport Are there alternatives to solely more car parks? Should access by non-car users and pedestrians be encouraged by better access, routes and facilities? Should routes from the Railway Station be clearer? Is the bus station sufficient or should it be enlarged? 	Noted. See above responses.
Detailed response		
4.11	<p>Baseline review</p> <p>2.2 It is essential that the Vision should reference and use documents produced by local civic societies. Horsham Society request Add Horsham Society Design Brief as a reference document. Add National Planning Policy Framework (NPPF). Need to include Town Centre Character and Design General Guidance 4, to protect and enhance the heritage assets. There is no reason to exclude them. Add reference to Horsham Conservation Area. This is major omission</p> <p>2.8 Age 30-49 in table is not 4.8% of population.</p>	Disagree. The Vision is not a statutory planning document. The Design Brief is acknowledged and welcomed and will be considered and inform the development of a Public Realm strategy and site specific projects as proposed in the Vision's Delivery Schedule at Section 9.5 working with the Horsham Society and other key stakeholders.

4.12	<p>3 Market review</p> <p>3.6 Needs comment as to whether this number of office to residential conversions is desirable. Can it, or should it, be managed by Planning Control?</p> <p>3.9 What is the expected growth or change in population?</p> <p>3.15 Needs comment as to whether the level of retail provision is too high/too low so what should be done. Otherwise there is no vision about what Horsham needs.</p> <p>Furthermore, because the Vision has taken so long to produce in a number of cases events have already overtaken their recommendations. For example, the suggestion that North Street be retained for offices comes too late. That bird has flown with a very large proportion of North Street office space facing conversion to residential use. Also the recommendation for more hotel space has been overtaken or realised, at least in part, by the new Premier Inn in Piries Place.</p> <p>3.16 Same question on the office market. What is needed in the future?</p> <p>3.21 Is this advice to Council to encourage office space instead of conversion to residential?</p>	<p>Current planning Permitted Development Rights (PDR) allow office accommodation to be converted to residential use so long as a limited number of pre-conditions are met. This has to be balanced against the need to provide many more additional homes across all tenure types, in particular, affordable homes and homes to rent. Horsham's requirement is a minimum of 800 homes year set by the Horsham District Planning Framework. The Vision's SWOT analysis at Section 4.0 refers: The Horsham Town Centre Retail and Leisure Study (2017) identified considerable additional retail floorspace need. The Study identifies 7,500sqm net convenience need and 10,700sqm net of comparison need by 2026, though this makes no allowance for continuing overtrading of existing stores. Around 6,000sqm net of this could be directed to the new community north of Horsham. However, clearly there is significant opportunity for additional floorspace to be delivered to expand the town centre offer without damaging existing trade.</p>
4.13	<p>4 SWOT Analysis</p> <p>Retail weakness - what evidence is there of households asking for more cinemas, especially as it is as the expense of retail space?</p>	<p>Household surveys carried out as part of the Horsham Town Centre Retail and Leisure Study (2017) were generally positive, though respondents did identify that cinema and clothing shop provision in particular could be improved</p>
4.14	<p>5 Strategic Town centre Review</p> <p>5.7 The claims the town centre is car orientated because it is the preferred method of transport, is simply untrue. Many people walk, many cycle, many use public transport and some on motorised scooters. Many use cars because it is the only way, but to suggest that most drive is without evidence. The vision must look beyond the present and to the future, so what is the vision? Otherwise this is no more than a prejudiced view of Horsham, reinforcing stereotypical behaviour.</p> <p>5.10 Dreadful barriers and poor signalised crossing present a major barrier either direction to pedestrians and cyclists</p> <p>5.13 It seems ironic that the main council offices, for both West Sussex and Horsham District form part of street with "little sense of place" or "animation".</p> <p>5.14 This is busy pedestrian route. It is not primarily a car orientated as a gateway, only as a junction on the road</p> <p>5.15 The gateways to the town are the arteries for Horsham trade as a centre. This document knows where they are but does not understand them and does not develop ideas or visions for them.</p> <p>5.22 The crossing to John Lewis is a key problem and must be improved</p>	<p>Noted. The comments are welcomed and will form part of a more detailed conversation that will be addressed by the proposed Public Realm and Walking and Cycling Strategies as proposed in the Vision's Delivery Schedule of projects to be taken forward.</p>
4.15	<p>5.22 Spot on -- "There is no easy crossing point for pedestrians and cyclists moving between the John Lewis at Home and the rest of the town centre. There is a danger that such provision could lead to a single stop and therefore it is recommended that the Council seeks to enhance linkages between the store and the rest of the town centre."</p> <p>5.24 The northern commercial quarter along North street is no longer commercial but now largely residential character as office have been sold and converted to residential. This was led by Horsham council selling their own offices, then showing their own inability to control planning and conversions. The commercial element is now a minority so equally leisure with the Park, Pavilions, Capitol Theatre and Black Jug public house.</p> <p>5.26 The diagram shows what appears to be a crossing directly north of the roundabout into John Lewis/Currys. It's not there but seems desirable together with the link through to Worthing Road.</p> <p>5.28 Diagram shows what appears to be an imaginary crossing directly adjacent to the roundabout into JL/Currys. The crossing is not there. Is this a proposal? The diagram shows a link across to Worthing Road. Is this going to happen? This is an important link.</p> <p>We question whether the main access is by car. Certainly this assumption leads to the need to make non car access much better</p> <p>5.30 The "halfway house" phrase suggests unfinished. It does have a sense of space, and place to being the sunshine. Describing it as halfway implies that it needs further development. This is not so. Omit the reference to halfway house.</p> <p>Secondary retail</p> <p>5.31 There is a lack of visual continuity in the Bishopric - so what is proposed?</p> <p>Strategic Directions for Town centre</p> <p>5.41 The lack of community facilities is encouraged by disinterests by the planning authority. Requests for inclusion in different developments have been ignored by the planning authority, while developers have no financial benefit to include them</p> <p>5.42 Key issue, make the gateways more pedestrian, public transport and cycle friendly.</p> <p>5.43 involve and include Horsham Society</p> <p>5.44 involve and include Horsham Society</p> <p>5.45 Not so. Sainsbury's redevelopment did not have support, 44% against 34% in favour. Response to other proposals were hardly overwhelming, indeed some there is some debatable maths in the summary response.</p>	<p>Noted. The Vision proposes at Section 9.5 a Delivery Schedule of projects, involving the Horsham Society and other key stakeholders in addressing the areas identified.</p>

4.16	<p>Town Centre Opportunity Areas</p> <p>6.3 Horsham District Council and WSCC have control over Blackhorse Way. The bad state and lack of management is their responsibility and in their gift, indeed duty, to resolve. It does not need a study, nor Sherlock Holmes, to identify the problems and responsibilities.</p> <p>6.6 This is a controversial subject and the redevelopment of the Sainsbury's car park site reduces parking substantially as it is widely used and an integral part of the town as this study has shown in 5.19. Sacrificing this for dense residential is not approved by the questionnaire, where 44% were against, only a minority in favour. Demolition of the existing Library is not acceptable as this is an attractive and much used building, protection of the trees in this area is critical.</p> <p>6.7 What does this mean is there should be no change? What is the vision?</p> <p>6.8 This whole section is vague and unclear as to what is being offered. What links are being proposed, what transport?</p> <p>6.9 What has happened to the proposed and much needed pedestrian route from Worthing Road to John Lewis and the imaginary but much needed additional Crossing of Albion Way?</p> <p>6.10 Where is the route to and from John Lewis referred to below?</p> <p>6.13 This seems to ignore the redevelopment of Swan Walk to provide a cinema, compare with the extensive description of the plans for inclusion of a smaller cinema in Piries place</p> <p>6.18 That might be considered complacent. Queen Street</p> <p>6.19 What are the proposals? River Arun Corridor</p> <p>6.21 A "counterbalance to formal leisure offering of Horsham Park". Explain?</p> <p>6.23 What exactly is in the mind about "potential to create new residential-led developments along the corridor Royal Sun Alliance & Station Car parks</p> <p>6.25/6.26 the issue here is access see 6.62</p> <p>6.27 It is also adjacent to the railway line, so residential may be possible but not desirable. There seems an inbuilt assumption that surface car parks are inefficient.</p> <p>6.29 There would be significant traffic impact on New Street. How will developer contributions improve this narrow street?</p> <p>6.30 Horsham District Council should be controlling A Boards</p>	<p>Noted. The Vision proposes at Section 9.5 a Delivery Schedule of projects, involving the Horsham Society and other key stakeholders in addressing the areas identified.</p>
4.17	<p>Key Development Sites</p> <p>6.31-6.38 This section is muddled and unclear. What is proposed here?</p> <p>6.33 Albany House, throughout</p> <p>6.34 It has been approved. Black Horse Way / Forum / Sainsbury's</p> <p>6.42 "fairly ideally". Does that mean ideally?</p> <p>6.43 -6.45 This is made up to justify the result. There is no southerly gale across the Forum. The Forum has a sunny view south onto some magnificent trees, the remnants of a park. This whole proposal needs careful consideration as it would entail losing a pleasant and well used library building to replace it with the same.</p> <p>6.45 We object to this casual demolition</p> <p>6.46 The public opinion is clearly against this. The proposed dense terrace housing is most inappropriate for a town centre location and conflicts with all the fuzzy words in previous sections about Horsham being an attractive place to live. The sketch is just unattractive. Piries Place</p> <p>6.55 Why do they not include the Council owned Piries Place Car Park. Horsham District Council are the client of this document?</p> <p>6.56 So what is the recommendation? Office Outlet / Currys</p> <p>6.60 Yes but access to this quarter of town is very difficult. Redevelopment and retail cannot be fully maximised unless and until pedestrian access is improved. This is a fundamental fault that Horsham planning created but has yet to resolve.</p>	<p>Noted. The Vision proposes at Section 9.5 a Delivery Schedule of projects, involving the Horsham Society and other key stakeholders in addressing the areas identified. Section 6 provides general commentary on Town Centre Key Development Sites' possible options and constraints. 6.33 Albany House is correct also known as the Trend Building. Agree - DELETE 'fairly' at <i>paragraph 6.42</i>. 6.43 The Council has received comments noting problems with strong winds in the winter and visual glare from the light coloured surface treatment. 6.45 These are suggestions and advice at this stage and not to be read as firm commitments. The Council seeks to work with West Sussex County Council to look at the future needs of the library and the opportunities to provide a better facility and develop the library area together with the Dr's Surgery which is at capacity and needs more space to meet existing and future demand for local health services. The Council is aware that the County Council are looking, in future, to provide more services to residents in libraries as these are very popular and note Horsham library received over 360,000 visits last year. The Council agrees that any proposed scheme would need to be developed, designed, tested and refined using appropriate evidence and would also need to be subject to a detailed business case, public and statutory consultation, statutory processes, before being implemented. It is acknowledged that the Council and County Council would need to carry out detailed consultation on any changes to library services, the building and the area in general. The Council, following consultation in May and June this year will not be progressing this idea further.</p>

4.18	<p>6.60 This solution may need a wholesale review and imaginative solutions, possibly extending the pedestrian realm over the road, perhaps by sinking the road, in order to connect this area to the town. Expensive but effective Royal Sun Alliance & Station Car parks</p> <p>6.62 Horsham Society object to the casual loss of the pocket park in New Street Gardens</p> <p>6.62 Access onto New Street would be very difficult.</p> <p>6.61 The diagram clearly shows the benefits of developing this land in conjunction with Winterton Court.</p> <p>6.61 What pedestrian improvements are planned outside Horsham station? They are shown on 6.66 but not described?</p>	<p>Noted. The Vision proposes at Section 9.5 a Delivery Schedule of projects, involving the Horsham Society and other key stakeholders in addressing the areas identified. New Street Gardens: The Town Centre Vision statement for the future of Horsham sets out some options and ideas about how the Royal Sun Alliance (RSA) and NR Station car park sites could be developed, but no plans have been approved to remove New Street Gardens and the concerns of local residents are understood.</p> <p>In a detailed response, the council highlights the following:</p> <ul style="list-style-type: none"> • Paragraphs 6.61 to 6.66 of the Vision Statement consider possible options that could be further explored in relation to the RSA and NR Station car parks. It is only noted at paragraph 6.62 that development of the RSA site to provide both additional parking and housing would require the provision of additional access via New Street Garden. • Paragraph 6.63, alternatively, explores increasing car parking alone with no impact on New Street Gardens. • Paragraph 6.66 explores the option of combining both car parks and states that if considered together additional access may not have to be relied on. The whole section looks at possible options and constraints only. • The Vision’s Delivery Schedule at section 9.5 proposes: ‘Horsham Station/Royal Sun Alliance car parks - Explore options and develop schemes to increase parking capacity and potential for additional residential provision and explore options for public use of car park’. <p>The council will work with landowners to assess future potential for additional parking and/or residential development and the public would be fully consulted on any proposals, should they come forward. It should be noted that the two sites are constrained and any proposed development will need to be carefully assessed in relation to any impacts on neighbouring properties, open space and the local road network.</p>
4.19	<p>Key development sites <u>Black Horse Way / Forum / Sainsbury's</u></p> <p>7.2 Needs early engagement with Horsham Society</p> <p>7.13 The worry is that this sounds as if it has already been decided as a good idea, without full investigation. Refer to the public consultation where despite the creative maths, 46% object to redevelopment against 34% in favour. <u>Black Horse Way</u></p> <p>7.14 This is long overdue by Horsham District Council requiring enforcement of existing rules. Office Outlet / Curry's Needs imaginative solution to bring this area into easy pedestrian access otherwise footfall and trade will be low. Royal Sun Alliance & Station Car parks</p> <p>7.38 Good luck...</p> <p><u>Civic Quarter</u></p> <p>7.41 Given the Council's inability to restrict changes in the commercial quarter, it is most unlikely that the Council will be able to, or want to resist these pressure, especially as residential units would assist housing targets</p> <p>7.42 Pie in the Sky. The Council does not have robust traffic modelling, relying entirely on WSCC, who aren't really interested, and the developer, who will prove everything is possible. 7.43/7.44 This is Horsham District Council though...So what is the plan? How will it be encouraged and made to happen. Who by, when? This is the same bland sketch used in previous consultation with no definite ideas.</p>	<p>Noted. Comments welcomed. The Vision proposes at Section 9.5 a Delivery Schedule of projects, involving the Horsham Society and other key stakeholders in addressing the areas identified.</p>
4.20	<p><u>River Arun Corridor</u></p> <p>7.51 Unclear where additional office space is being provided if it is converted to residential.</p> <p>7.53 This should, be a vision, not a maintenance document requesting paths to be swept clean. What improvements? Which routes?, Who will they benefit - pedestrians, cyclist, mobility scooters, families? <u>Way finding and Signage</u></p> <p>7.57 Easy and straightforward, but need careful consideration to avoid gimmickry and street clutter. They need to be comprehensive across all areas of Horsham, not just those in this study Public realm</p> <p>7.58 Carfax and West Street have different styles, so the art is to link them but not simply paint them the same colour. Definitely highlight the modern aspect with good modern, not bland modern, architecture and design</p> <p>7.60 But this is Horsham Council that we are talking about again...</p> <p>7.61 Amusingly the most popular public response is to do very little.</p> <p>7.62 Horsham Society strongly object to removal of these trees which mask the busy dual carriage way. Removing them simply makes the road more visible but no easier to cross.</p>	<p>Noted - see above responses.</p>
4.21	<p><u>Road Crossings</u></p> <p>7.63 These problems were known when Horsham council promoted the East end, so it is for Horsham council to resolve them</p> <p>7.71 So what has happened to the imaginary crossing at the southern end of Albion Way. What improvement are there to be to the crossing of the dual carriageway at the Bishopric?</p>	<p>Noted - see above responses.</p>
Horsham in Bloom		Recommended Council Response

5.1	<p>Major concerns HIB, after careful study of the vision statement, has the following concerns:-</p> <ul style="list-style-type: none"> □ The absence of “Greening” i.e. the inclusion trees, shrubs and flowers as appropriate, does not appear to be seen as an integral part of the planning process on the artist’s impressions of either Bishopric or Piries Place. This is a short-sighted omission. The refurbishment of West Street provides a clear example of such an oversight. The Project Team believed greening could be successfully added following completion of the construction work. It failed completely. As explained to the Project Team by both HDC Officers from HDC P&C and the Chair of HIB at the time in a presentation to Councillors and the Project Team, greening, in a busy urban area is on a different scale and requires a totally different approach to domestic gardening. It needs to create impact above eye level, be robust, sustainable and durable. The subsequent greening as an additional activity did not achieve the effect that incorporation into the Plan from the outset would have. □ HIB urges planners to learn the lessons of the West Street debacle and involve the highly trained horticultural professionals from HDC staff with expertise in urban greening from the outset, particularly in the case of Horsham town. □ HIB regrets and is surprised that it is not included as a key partner in the Horsham Town Centre Vision consultation process alongside HDC, NCs, HDC P&C, HTCP and Horsham Society despite a proven record of success. 	<p>The artist's impressions were illustrative only as part of the overall planning submissions. Both approved schemes are required to submit further details of external proposals as part of the 'Reserved Matters' approval process. The Council welcomes and accepts that 'Greening' as part of any future public realm landscaping project is an important consideration to be taken together with the preservation and enhancement of the town’s historic character. Horsham in Bloom will be recognised as a Key Partner in bringing forward the Delivery Schedule. The Delivery Schedule at section 9.5 will be AMENDED to include: <i>Horsham in Bloom</i> on relevant projects. HDC staff with significant horticultural and landscape experience will be consulted and involved in the development of relevant Vision projects.</p>
5.2	<p>Conclusions</p> <ul style="list-style-type: none"> □ The Draft Vision Statement identifies and acknowledges the problems associated with piecemeal growth and development of Horsham. □ It highlights the range of initial impressions gained by people at six very different gateways to the town. □ Horsham currently appears to be experiencing an identity crisis with the tentative conclusion that it will evolve from an Ancient Market Town into a Modern Market Town. A careful and comprehensive overall greening plan for the town would provide a consistency presently absent which would equalise the present disparate natures of the town gateways. 	<p>Noted and agree. The Vision proposes: to 'Develop a 'holistic' town centre public realm strategy that addresses:</p> <ul style="list-style-type: none"> • Character spaces • Linkages, connectivity and movement between spaces • Wayfinding and signage • Development and design guide • Public realm materials and street furniture palette • Gateways, pedestrian crossings and underpasses • Public art
5.3	<p>Requests</p> <ul style="list-style-type: none"> □ Greening is regarded as an important integral element of the planning from the outset to provide continuity and to reduce unnecessary additional capital expenditure due to oversight at a later date. □ Greening is viewed with comparable importance alongside the preservation and enhancement of the environment and the appearance of the town. □ Consideration is given to including HIB as a Key Partner to benefit from its proven track record of coordinating the work of volunteers and HDC Officers in improving the quality of the everyday experience for the population in and around Horsham. 	<p>Agree. 'Greening' is an important element to be considered alongside other elements such as street furniture, lighting etc and the historical context in providing positive outcomes and will be considered during the development of improvements projects listed in the Vision's Delivery Schedule. The Delivery Schedule at section 9.5 will be AMENDED to include: <i>Horsham in Bloom</i> on relevant projects. See response above.</p>

West Sussex County Council		Recommended Council Response
6.1	<p>General</p> <p>1. The development of a Vision is welcomed.</p> <p>2. The Town Centre Vision is a lengthy document and there is a need to get some way in to the document before mention of the strategic direction for the Town Centre. A number of opportunity sites are then identified and it would be helpful if there was a clearer link between the description of the opportunity related to these sites and the strategic direction identified. The County Council recognises that the strategic direction and the opportunity sites have already been subject to consultation and that this document has been amended in the light of the comments received therefore this document starts to develop a delivery plan for those sites.</p> <p>3. Considering the identification of potential development sites the County Council requests that there is acknowledgement in the document that there will be a need for schemes to be developed, designed, tested and refined using evidence. They will also need to be subject to business cases, consultation and all relevant statutory processes before they can be implemented. The delivery aspect will be considered as the District Deal develops – HDC and WSCC will need to understand the resources required to progress the many elements identified in the document and prioritise accordingly. The District Deal is being developed to capture the commitments made by each authority when they are agreed.</p> <p>4. The County Council would support, as set out in the Delivery Schedule section, the preparation of a public realm strategy and a walking and cycling strategy for the town centre, with Horsham District Cycle Forum (HDCF) and WSCC being referenced as key partners in both cases. The walking and cycling strategy should highlight the priority routes for future investment in order to increase levels of walking and cycling. Through this work consideration should be given to the aims and objectives of the West Sussex Walking and Cycling Strategy 2016 – 2026 and the list of potential schemes contained within it as well as the Government’s cycling and walking investment strategy (CWIS) and the target to double levels of cycling by 2025.</p> <p>5. The document would further benefit from the insertion of a plan that identifies the geographic scope of the document.</p>	<p>• 1. Support noted. 2. The Vision is set out in a rational way from Baseline Review, SWOT Analysis through to Key Sites and future Delivery. The Delivery Schedule at Section 9.5 links the Strategic Directions to each project. Recognition of consultation and amendments is welcomed. 3. Agree INSERT following text at paragraph 9.5 : <i>All schemes will need to be developed, designed, tested and refined using evidence and be subject to business cases, consultation and all relevant statutory processes.</i> 4. Support for strategies is welcomed. 5. Agree. <i>A Town Centre map will be INSERTED after Paragraph 1.4. INSERT</i> New paragraph 1.5 will detailing the Town Centre area under consideration as follows: <i>1.5 For the purposes of this report the Town Centre is the area bounded by Albion Way, Parkway, East Street, Queen Street, Denne Road, the River Arun and Freshwater Parade/Bishopric.</i></p>
6.2	<p>Library – Black Horse Way, The Forum, Sainsbury</p> <p>The County Council looks forward to continuing to work with the District Council on the identified opportunities within land in County ownership in the town centre. This includes the library site. There are a number of detailed matters that will need to be taken into account as part of this work stream, which will follow on from the Vision and are set out below:</p> <ul style="list-style-type: none"> • The current library in Horsham is well situated close to transport hub and parking. It currently has a footfall of over 360,000 pa. It one of our top 4 libraries in an area of growth if the plans for library transformation proceed then this will see libraries delivering more services for residents. • The exact location of the proposed site of the new library needs to be developed. What it looks like; the proposed footprint in sq.m; all on one level? All on the ground floor? • Our service direction of developing libraries to deliver more services means it is unlikely we would be able to downsize from the current provision. • If the new site requires provision on more than one floor then appropriate accessibility should be achieved - our experience shows that it is very difficult to make multi-floor libraries work (the current building is an exception). • Parking is key to library use . Consideration will need to be given to the provision of short term customer parking, which is very important to key and WSCC priority customer groups (people with young children and older people). Disabled parking is essential (Libraries deliver blue badge collection). There will be a requirement to retain staff parking in some form. 	<p>While the quality of the existing library is noted there are no proposals to replace it at present. The Council seeks to work with West Sussex County Council to look at the future needs of the library and the opportunities to provide a better facility and develop the library area together with the Dr’s Surgery which is at capacity and needs more space to meet existing and future demand for local health services. The Council is aware that the County Council are looking, in future, to provide more services to residents in libraries as these are very popular and note Horsham library received over 360,000 visits last year. The Council agrees that any proposed scheme would need to be developed, designed, tested and refined using appropriate evidence and would also need to be subject to a detailed business case, public and statutory consultation, statutory processes, before being implemented. It is acknowledged that the Council and County Council would need to carry out detailed consultation on any changes to library services, the building and the area in general.</p>
6.3	<ul style="list-style-type: none"> • It does not seem clear whether/where a new Doctor’s surgery would be provided and we can see not mention of provision for Citizens Advice. Colocation of services is a real strength of the current building. It would be helpful if the Vision set out that this is an element that this plan would encourage. • There is mention of “increased IT space” in a future library. Whilst we will support digital inclusion and access in a future library – and certainly library use by customers using their own devices is rising. Evidence would suggest that in the future we would need less designated space for fixed IT but more space for flexible/partnership use. • In a key library serving this size of community it is realistic to think that a similar level of book stock will need to be retained with additional community/flexible space?. • There is a danger that shrinking The Forum reduces the attraction to this area. Note that Page 28 refers to a low footfall – it is our view that this is NOT AT the library, but is in Worthing Road. This should be amended and is confirmed by a very high footfall across the Forum – just yards from the library entrance. The footfall at the library last year was around 1200 a day • We would welcome the opportunity for early and detailed involvement. Libraries are a public service residents choose to use and about which they are protective of and interested in. Like schools and doctors people moving into an area often seek out the library when they are assessing an area to move to and when they first arrive – as a way to find out about the area and community. 	<p>Noted - see response above.</p>

Individual Comments							Recommended Council Response
Ref.	Name	Surname	Organisation	Vision Ref.	Comments Category	Comments	
W/E 1st OCTOBER							
385968	M	Gimber		5	Observation	Mapping does not show cycle routes. How can adequate provision be planned if existing routes are not shown in the document.	Noted: Cycling routes will be mapped as part of the development of a Local Cycling and Walking Investment Plan (LCWIP) as proposed in Section 9.5 of the Vision: 'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'
385968	M	Gimber		5.25	Observation	cross town cycle route developed by council south of Sainsbury is not shown. why do the routes money has been spent on not show up on council mapping?	Refer to response above
385968	M	Gimber		6.6	Observation	No cycle route shown.	Refer to response above

385968	M	Gimber		6	Observation	People use Sainsbury car park to get 'free' parking. If you built houses here you would kill off a lot of retail trade in the town centre.	Following the Vision Exhibition consultation responses the Council will not be exploring ideas to develop Sainsbury's or the car park and appreciate this is key town centre use which should be retained in its current form.
W/E 8th October							
387388	J	Kimbell		4.1 SWOT Analysis	Observation	Horsham might have an older population but its spending power and influence should not be underestimated. As an older flat owner who does not drive I would not want my ability to live in Horsham to be diminished because I am not in the mainstream demographic.	The Vision acknowledges at section 2.8: ' <i>Horsham has an ageing population; there is a high proportion of older working age adults (aged 45-64) and the retired (aged 65 and over), and a lower proportion of young adults aged 15-24 and adults aged 25-44.</i> '
387388	J	Kimbell		4.1 SWOT Analysis	Observation	The diversity of shops in Horsham must be maintained. It is this that give it its character. In the photos you show of the town many of the shop spaces in The Carfax and East Street have become empty since the photos were taken. The Carfax in particular must have full occupancy even if it means giving some rent reduction to independents.	The Council supports retail diversity and while there are some vacant shops overall retail voids have been below the national average and compared to other town centres. The Horsham Town Centre Retail and Leisure Study (2017) identifies that Horsham is a strong centre with a low vacancy rate with a good mix of occupiers. Surveys confirmed that retail businesses are positive about the town centre and their on-going role there. As most shops are privately owned the Council cannot control rental levels.
387388	J	Kimbell		4.1 SWOT Analysis - Pu	Observation	If you care about the ambience of Horsham, which is a huge part of its attraction, then why hasn't the waterfall in the Bishopric outside of the Olive Tree not be working for most of the year? There is a sense that some of these things are being abandoned while you think about what to do next but unique features like this contribute so much to the character of the town.. That part of the town where the much-missed Lotties used to be is a perfect cafe area and doesn't need much to make it a destination and a pit stop before John Lewis.	Noted. The waterfall is subject to regular maintenance to clear leaves and litter and check water quality. Currently the main water pump has failed and the Council are seeking quotes for replacement parts. Consultation responses show a high level of support for retaining the waterfall and stream. The Vision at section 9.5 proposes to 'develop a detailed scheme to improve the public realm and increase connectivity to John Lewis at Home and Waitrose.' The Council will fully consult on detailed proposals in due course.
387388	J	Kimbell		5.1	Observation	The Aviva proposal for Swan Walk must not drive out shops like Sienna Rocks. Clothes shops like Sea Salt and Crew will help Horsham maintain its retail footfall and the more the better. The report suggest there is a low shop vacancy rate but it certainly doesn't look like it and perception is incredibly important.	Noted. AVIVA received planning consent on 22 February 2017 for part demolition, reconfiguration and extension of the western part of the shopping centre to provide new restaurants/cafes at ground floor level, a new retail unit at mall level and a multi screen cinema complex above. If the scheme is implemented it should support the continued strength of the shopping centre - Sea Salt and Sienna Rocks would not be affected by the proposed development.
387388	J	Kimbell		5.42	Observation	The crossing from West Street to The Forum shows Horsham in its worst possible light unless you like rubbish bins. Blackhorse Way itself has bad pavements if you walk from The Causeway. The appearance is tatty and the existing crossing causes delays to the (excellent) bus services that have to negotiate it.	The Council shares this view and will address all these issues. The Vision at section 9.5 refers to future projects: <i>Blackhorse Way (1) – Develop a waste and servicing arrangements strategy to address overall management and appearance.</i> <i>Blackhorse Way (2) – Assess one way traffic options and develop scheme to reduce traffic flows and improving pedestrian facilities, including the West Street to Forum link, and upgrading the public realm.</i> The Council will fully consult on any detailed proposals in due course.
387388	J	Kimbell		6	Observation	If the empty premises in Horsham are filled and the right blend found of independent shops, open seating areas like The Carfax with restaurant and parking, combined with improved leisure facilities, Horsham can become an all day destination. The concern is that some areas, like the proposed Piries Place development, will be focussed so much on a younger clientele that the older residents and shoppers will feel marginalised. Horsham is a wonderful place that looks a bit sad at the moment but hopefully can be reinvigorated. And please fix the waterfall!!	Noted. The Horsham Town Centre Retail and Leisure Study (2017) identifies that Horsham is a strong centre with a low vacancy rate with a good mix of occupiers. The Vision proposes at section 9.5 to ' <i>Develop a 'holistic' town centre public realm strategy that addresses:</i> <ul style="list-style-type: none"> • <i>Character spaces (such The Carfax)</i> • <i>Linkages, connectivity and movement between spaces</i> • <i>Wayfinding and signage</i> • <i>Development and design guide</i> • <i>Public realm materials and street furniture palette</i> • <i>Gateways, pedestrian crossings and underpasses</i> • <i>Public art.</i>' The Piries Place development will see the provision of a new Everyman Cinema with new restaurants and shops. To address parking issues the Council is proposing to demolish and replace Piries Place car park to improve access, appearance and increase parking spaces to meet future demand. The waterfall will be fixed shortly.
391644	D	Vaughan		5.22	Object	The present library works well and is a good example of modern design it should be retained. The suggested replacement is nondescript.	Disagree. While the quality of the existing library is noted there are no proposals to replace it at present. The Council together with West Sussex County Council are seeking to look at the future needs of the library and the opportunities to provide a better facility and develop the library area together with the Dr's surgery which is at capacity and needs more space to meet existing and future demand for local health services. The County Council are also looking in future to provide more services to residents in libraries as these are very popular - Horsham library received over 360,000 visits last year. Any proposed scheme would need to be developed, designed, tested and refined using appropriate evidence and would also need to be subject to a detailed business case, public and statutory consultation, statutory processes, before being implemented. The Council and County Council would carry out detailed consultation on any changes to library services, the building and the area in general.

391644	D	Vaughan		5.22	Observation	What became of the proposed pedestrian crossing of Albion Way opposite John Lewis, which was shown on earlier plans?	The idea to provide an additional crossing has been postponed as there is insufficient road capacity which would result in vehicles backing up to the junction with the Bishopric. As part of the Bishopric public realm enhancement project there will be a review of the existing single phase crossing and other suggestions to add a second crossing on the northern side from Guildford Road.
391644	D	Vaughan		7.23	Observation	Artist impression of Blackhorse Way shows cyclists in the middle of the road with no provision for cycle lanes.	Noted. It is just an artist's impression. A Local Cycling and Walking Investment Plan (LCWIP) will be undertaken as proposed in Section 9.5 of the Vision: <i>'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'</i>
391644	D	Vaughan		7.62	Object	The vegetation and water feature serves to hide the ugly dual carriageway and reduces its noise. In previous surveys there was strong support for its retention.	Noted. It is proposed to DELETE at paragraph 7.62 <u>'Further to this, the trees and shrubs currently at the end of Bishopric could be substantially reduced. Currently, this vegetation blocks views and desire lines and effectively discourages linked trips between the core shopping area and John Lewis at Home, and reduces visibility of the retail units., which may be damaging trade. In the longer term, the Council may consider replacement of the water and seating features in Bishopric for similar reasons, but this is less of a priority and could wait until these features are closer to the end of their design life. Removal of the vegetation should be relatively straightforward to implement with sufficient Council resolution'. and INSERT with: <i>'The Bishopric survey responses confirmed the need to improve connectivity between the town centre and John Lewis at Home and Waitrose. Also businesses in the area and footfall in general would benefit from some of the existing vegetation being removed, however, overall the public are keen to retain as much soft landscaping and water features as possible. Noting all the survey responses received the Council proposes, at section 9.5, to develop and consult on a detailed scheme to improve the Bishopric public realm'</i></u>
391644	D	Vaughan		7.65	Observation	A wheelchair lift is unnecessary as there is a gradual ramp and cycle racks are already provided on the town side.	Noted.
391644	D	Vaughan		8.7	Object	The provision of cycle paths is woefully inadequate	Noted. The Vision proposes at section 9.5 to develop <i>'A Local Cycling and Walking Investment Plan (LCWIP) will be undertaken as proposed in Section 9.5 of the Vision: 'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'</i>
392196	B	Bell		7.45	Object	The Council should take this opportunity to improve this entrance to Horsham town. The proposed public realm enhancements will not detract from the awful row of shops on the southern side of the road with flats above. This 60s block should be removed and replace with something modern to complement the flats on the other side of the iron bridge.	Noted. The Vision proposes at section 9.5: <i>'Town Centre – East: Progress Queen Street/Iron Bridge improvements, eastern gateway and links to East Street to include supporting retail function and area identity.'</i> The Council acknowledges the need to improve all gateways into the town centre including Queen Street.
392196	B	Bell		7.49	Object	This artist's impression shows how ugly this facade is along Queen Street. The Council needs to be bold and remove these buildings and replace with something modern. There could be a restaurant with outdoor seating to extend the East Street offer. The area benefits from the car park in New Street. Alternatively it could be used for a large retail store, similar to Pets at Home as there is vehicular access behind.	Noted. While acknowledging that the Queen Street area should be improved the Council does not own the block of shops/flats on the south side of Queen Street. In developing proposals the Council will engage with landowners to improve the appearance of the parades in consultation with owners, leaseholders and residents.
W/E 15th October							
392600	A	BARBER		1 Bishopric	Support	Horsham is a market town so why try to make it look like Crawley with huge expanses of concrete, 'whimsical' movie theme paving which doesn't match anything else and bland, boring hard landscaping. Maintaining as much of the green and water as possible to soften the awfulness of the proposed cinema and make it a nice place for people to stop and sit. (proposal 1 and three)	Noted. The majority of responses to the Bishopric improvements ideas supported extending the West Street paving and retaining the existing waterfall and planting. The movie theme paving idea was not well supported. Following all the feedback the Council will develop and consult on more detailed proposals in due course. Section 9.5 of the Vision refers: Bishopric (1) Eastern area (Albion Way-West Street, including Springfield Rd and Worthing Rd axis): Develop a detailed scheme to improve the public realm and increase connectivity to John Lewis at Home and Waitrose. Bishopric (2) – Western area (Albion Way-Rushams Rd): Progress a detailed scheme to enhance public realm, western gateway and support retail function.
392600	A	BARBER		2 Bishopric	Support	Water feature, option C but is it necessary to have a huge Horsham sign for Parkour runners to jump over? Too modern, save it for a new town	Noted: Refer to response above.
392600	A	BARBER		3 Bishopric central area	Support	Option A - as much soft landscaping as possible please	Noted: Refer to response above.
392600	A	BARBER		4 Other features, Bishopric	Support	Option C inset text paving, unobtrusive but quirky and interesting. Like the idea of planters and events area but you are so bad at maintaining the planters that we already have (Horsham in Bloom no more) and what happened to those nice umbrellas and bench seating in the Carfax - great idea. Also those trees in planters outside St John's, what happened to them they didn't seem to be there long though they were really striking. Modern lighting should at least hint at the old market town that was Horsham.	Noted: Refer to response above.

392600	A	BARBER		5	Observation	and objection to both new cinemas when we have a The Capitol which should be supported not undermined. Crawley has the space and does the cinema option better. Where will they all park?	Noted: Both Swan Walk and Piries Place proposals provide a cinema offering and have received planning permission after due consideration of all planning issues including parking. It should be noted that planning permission cannot be refused solely on the basis of a competing alternative. The Council values and directly supports the Capitol theatre and will continue to do so. If the Swan Walk cinema proposal progresses then Horsham will have a local family orientated cinema offering, instead of having to travel to Crawley, which will provide jobs and support the town centre economy. Piries Place Everyman cinema is a 'boutique' cinema chain and would generally provide a different cinema offering than the Capitol so providing a more diverse town centre leisure offer supporting the local economy and creating additional employment.
393032	S	Doy	Horsham Denn	See comments	Observation	As this space is insufficient please see the separate response from Horsham Denne Neighbourhood Council sent by email.	A full response to Horsham Denne Neighbourhood Council is provided above.
395176	S	Charman		3.13	Observation	You'd expect rents in Guildford to be greater as it is a city with a couple of shopping centre and two vibrant main shopping streets. Likewise, I would expect, though am not seeing, rents in Crawley to be greater as shops attract shops. There are lots of shops given the large Mall in Crawley. Horsham's rents should be lower. It is a smaller town which can't compare or compete with the former and should be looking to exploit its own USP - a market town with a unique offering	Noted: The Vision, at section 5.43 Evolving Image and Identity, recognises that: <i>'More could be done to define and communicate Horsham's identity as a modern market town. Due to Horsham's proximity to the High Weald AONB, the South Downs National Park and its market town heritage, there is an opportunity to invest in this image and create a new distinctive identity for Horsham. In order to achieve this.'</i> Section 9.5 proposes to develop and produce a detailed Public Realm Strategy and promote image and identity by developing a Tourism and Marketing Strategy as the next stages of work to deliver the 'Vision'.
395176	S	Charman		3.17	Observation	If there is a decrease in demand for office space which is possible attributed to the dated office stock, rather than convert into flats why not re-build/renovate/refurbish in a modern style to meet the demands of the market. The town can only take so many town centre flats and the market for the same will soon be saturated.	Current planning Permitted Development Rights (PDR) allow office accommodation to be converted to residential use so long as a limited number of pre-conditions are met. This has to be balanced against the need to provide many more additional homes across all tenure types, in particular, affordable homes and homes to rent. Horsham's requirement is a minimum of 800 homes year set by the Horsham District Planning Framework.
395176	S	Charman		3.29	Object	<i>New Hotel</i> -Disagree. How does this demonstrate that? A paragraph above it was stated that the majority of visitors only stay a day.	AMEND Vision: Paragraph 3.22 of the Vision states that as a result of a lack of hotel space the majority of visitors only stay a day and by implication that additional hotel provision will provide the capacity for longer stays. For further clarity it is proposed to INSERT the following statement at Paragraph 3.22 of the Vision: <i>The 2016 District Hotel and Visitor Accommodation study identifies a current shortage of hotel accommodation for local companies, future corporate demand, domestic short breaks and weekend away market, wedding, family and friends accommodation associated with existing and future housing and population growth.</i>
395176	S	Charman		4.1	Object	SWOT. Weakness. Retail: 'local community suggests more could be done to balance out high-end retail to meet demand of the whole catchment'. If you want high-end there are lots of options in nearby town. I am not saying go low-end but there are options in Horsham e.g. John Lewis, Joules, 'though respondents did identify that cinema and clothing shop provision in particular could be improved' Really? is 3 cinemas not going to be enough?!	Noted: Both Swan Walk and Piries Place proposals to provide a cinema offering have received planning permission after due consideration of all planning issues including parking. The Council highly values and directly supports the Capitol theatre and will continue to do so.
395176	S	Charman		6.27	Observation	Noted. Consideration needs to be given to where the users will park while work is done. Same with the redevelopment of the Piries Place car park - where are the 300+ people going to go.....	Noted: Any planning application to develop a car park to increase its use will be required to submit a traffic and parking impact study detailing temporary arrangements.
395176	S	Charman		6.38	Observation	Noted but there is already a mix of units empty. The large ex-BHS unit could be used by a store or split into two yet it remains empty. There are also smaller units available; most of which are probably too small. The town needs the likes of Dorothy Perkins, Oasis, Warehouse which previously had stores or units within Beales-surprised they haven't expressed an interest in the BHS unit-why???	Noted: AVIVA/Swan Walk has recently submitted a planning application to sub-divide the former BHS store into 3 smaller retail units, together with a gym at first floor and larger upgraded toilet facilities.
396138	R	Needham		6.46	Observation	Regarding proposals for development of car parks/central areas in Horsham - this applies to the Sainsbury site and others - there is no provision for parking in the artists impressions. Getting central zone parking is difficult in central Horsham and the waiting list is long. There seems to be very little provision for additional and safe residential parking. Ensuring properties have suitable access and allow off-street parking. There is a general trend for property development to only provide 1 space per 2 bedrooms with little or no visitor parking. To encourage family & young/affluent demographics to Horsham new developments must include suitable parking provision. On street parking reduces safe vehicle access and makes life harder for residences and child safety. The general location of Horsham means that cars are still a big part of life, even with the switch to electric in the near future allowing residence access to parking and be able to install their own charge points is even more important.	Noted. The Vision at section 9.5 proposes to <i>'Develop a car parking strategy to address future demand, management, access, usage and appearance.'</i> which should address the issues raised. The Council recently agreed to proceed with the demolition and replacement of Piries Place car park to provide a better service with more spaces and improved appearance.

396138	R	Needham		1.1	Observation	There is no provision for electrification in this report. The future of transport is electric (even hydrogen for buses). There should be a view of how the introduction of charging location should be managed for: Existing residents (there is a lot of on street parking) New residential developments (which seem to limit parking space numbers) Shoppers Tourists etc. By 2020/21 most, if not all, manufactures will be selling electric and plug in hybrid cars. Having a couple of charge points in a couple of car parks will not even come close to the demand. By getting ahead of this Horsham could be the go to location for people switching to electric/hybrid cars.	Noted. The Council will consider the provision of electric charging points within Piries Place and other council owned car parks as part of its overall Car Parks Strategy. The Council acknowledges the health benefits deriving from the use of electric vehicles. The Vision proposes at section 9.5 to: <i>Develop a car parking strategy to address future demand, management, access, usage and appearance.</i>
396416	B	Hall		Bishopric enhancemen	Observation	Continue West Street paving, maintain existing stream and waterfall, have circular feature paving, add raised planters with seating and use stack lighting	Noted. The Council will review all responses received in response to the Bishopric exhibition options and develop more detailed proposals, for consultation, in due course.
397002	D	Shaw		4	Observation	Re: the need for an events space for Horsham, this needs to be in the centre of town within easy reach of car parking and the bus terminal & also near to shops, cafes & restaurants to ensure that extra footfall is encouraged to spend money in the town. If an events space is on the outskirts of town, people will tend go home as soon as the event is finished.	Noted. The Carfax is normally used as the main events space with a annual programme of events such as Piazza Italia, the Big Nibble and AmeriCARna as well as the weekly markets.
397002	D	Shaw		6.35	Observation	As the west end of West Street is being redeveloped anyway, this would seem to be an ideal space for an events area. The removal of the Shelley Fountain, though regrettable, has opened a space adjacent to car parks & retail & may even send more customers towards John Lewis, which currently does not seem to belong to the town.	Noted. The Council will review all responses received in response to the Bishopric exhibition options and develop more detailed proposals, for consultation, in due course that address the provision of events space. It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature.
397002	D	Shaw		7.61	Observation	Further to comments re: Para 6.35 above, street furniture & planting should be moveable to facilitate the greatest & most efficient use of the area.	Noted.
397322	K	Stevens		6.35	Support	I would just like to comment on the need to find a different more permanent home for the ice rink. I live close to the new rink in the park and the scene is now a complete eyesore, with ugly large tents covering the open green space and blocking what was before a pleasant entrance and view of the park. What remains of the grass areas nearby are churned up all around and the rink hasn't even opened yet. This to me is clearly not an appropriate location for the ice rink and I would support it's relocation to west end of West Street, this being an ideal events space with better parking and little nearby housing.	It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature and unlikely to accommodate a facility such as the Ice Rink.
397436	N	Emery		2.8	Observation	The demographic trend towards an ageing population and lack of provision for the services of that population is most concerning. The provision of a local hospital that can be accessed by public transport will be critical. The current hospital provision is not capable of supporting the demographic profile that is envisaged in the paper. The paper also does not address the issue of inadequate primary health care provision , with no action to increase the number of general practices that will be needed. The provision of local authority nursing homes and day care is also not addressed. There will also need to an increased provision of public transport, especially buses, as many of the ballooning population of over 80s will not be able to drive safely and should be encouraged to give up private transport in favour of buses.	Noted.
397436	N	Emery		3.16,	Object	The strategy of the paper seems to be one in which it aims to turn the town into a retirement community, much like Eastbourne rather than to have a thriving diverse population of all ages. The plan contains a lack of provision for any sizeable increase in workspace and employment. Whilst there is provision for housing to be expanded there is no expectation that those moving to Horsham will find work in the town. The current office accommodation is weak and there are no major employers that are expanding.	Disagree. The Council has been set a target of ensuring at least 800 homes per year are provided over the lifetime of the Horsham District Planning Framework (HDPF) - a total of 16,000 homes. There are significant housing developments already underway to the west of the town centre which provide for a variety of tenures and sizes, in particular for families. The 'Vision's remit is focussed on the Town Centre. The Horsham District Planning Framework makes specific provision for employment sites.
397436	N	Emery		6.23. 6.24	Object	The paper recognises the unique environment of the river Adur and the opportunity it provides. The town needs areas of countryside that can be easy accessed. Do not put more commercial or residential development on this unique area. The entire paper lacks a sustainability assessment and only focuses on how the council can drive the desire to shop . Please leave some areas to nature and improve our access to them. Building on a flood plain is also very dangerous and affects the delicate ecosystem.	Noted. The focus on the Arun corridor is to look at the potential to develop existing sites while retaining and improving the environment. Any development proposals will need to be compliant with the Council's planning policies as contained in the HDPF.
397634	R	Langridge		4	Observation	I agree that an events area would be beneficial in the town but it must be in the centre so it draws together the 2 separate parts of the town so all shops benefit by the increased footfall and there is adequate parking. The Lynd Cross area at the bottom of West Street would be ideal and all furniture and tress should be moveable so the space can be used for events.	It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature.

397634	R	Langridge		7.61	Object	There should be no permanent tree planting to make this area flexible in size for different events to draw people in. Trees and furniture must be moveable.	Noted.
397660	D	Arnold		6.3	Observation	While I have admired much of the development of the central part of Horsham over the last thirty years, I see Blackhorse Way as something of a scandal. It should not simply be blamed on the way retailers use it as a refuse dump. The developers developed it that way when the large building on the South side was built too far to the North, with the Forum and the Sainsbury's car park too big, and with Blackhorse Way taking two-way traffic. The only rational solution I can see involves a two-way system, with one of the roads going through the Forum area. Ideally the North side of the large building in Blackhorse Way would be opened up to turn it into more of a shopping street rather than the town tip. As a town I suppose we are proud of the Causeway, and the only access to it is through Blackhorse Way!	Noted. The Vision proposes: <i>Blackhorse Way (1) – Develop a waste and servicing arrangements strategy to address overall management and appearance.</i> <i>Blackhorse Way (2) – Assess one way traffic options and develop scheme to reduce traffic flows and improving pedestrian facilities, including the West Street to Forum link, and upgrading the public realm.</i>
397660	D	Arnold		7.6	Observation	I am all in favour of the continued development of this area, but believe it should be done in such a way as to leave open the possibility of later development with, for example, a leisure complex built there. I would want to encourage you to think of future possibilities and try to avoid doing anything which makes them impossible.	Noted.
397708	C	Pirie			Observation	Please do not remove the fountain-waterfall and trees at entrance area to West Street & Swan walk from Albion Way and Bishopric. Such a delightful feature. Paving stones need replacing but otherwise superb. Thank you.	Support noted. Noting all the survey responses received, the Council proposes at section 9.5 of the 'Vision', <i>to develop and consult on a detailed scheme to improve the Bishopric public realm.</i> in due course.
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397888	M	Kingscott		para 4	Observation	I think the ideal events space rather than the temporary one in the park is ice rink should be at the bottom of west street and in the bishopric.	It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature.
397888	M	Kingscott		para 7.61	Observation	There should be no permanent fixtures and could be events space so could put trees in pots to move around.	See above response.
397888	M	Kingscott		para 6.35	Observation	Events space needs to be at bottom of west street and in the bishopric not in the park where there is a temporary ice rink.	See above response.
397955	F	Vernon		2.2	Object	The vision statement should include relevant policies relating to active travel. Particularly the following: - the West Sussex Walking and Cycling Strategy 2016-2026, whose cycling strategy supports the Government target to double levels of cycling by 2025. - West Sussex Sustainability Community Strategy 2008-2026 - West Sussex Transport plan 2011- 2026 - Policy 37 of Horsham District Planning Framework (HDPF): Be designed to encourage walking, cycling, cycle storage and accessibility to sustainable forms of transport	Disagree. While the documents referred are important in their own right the Vision is not a statutory planning document. As considered above in the detailed response to the Cycling Forum the County and National strategies referred to will form part of the proposed Local Cycling and Walking Infrastructure Plan that the Vision proposes to develop as part of the Delivery Schedule at section 9.5. It should be acknowledged that each project is a major and detailed area of work in itself. What the draft 'Vision' establishes, following the baseline analysis, exhibition and consultation is a broad consensus on the way forward in terms of the Strategic Directions and the key Opportunity Areas and sites. The Council will work with key partners as described, including the HDCF, building on the successful Cycling Summit held in October 2017. The HDCF have been made aware during direct contact and through the exhibition details the scope and remit of the 'Vision'.
397958	F	Vernon		5.7	Object	All the town centre gateways need to be improved to include safe access by cycle and on foot. The assumption in the document is that access is car-dominated (which is correct), and there is currently no vision to change this. But change could happen if the political will to do it is there.	Noted. The Council is committed to the development of a Local Cycling and Walking Investment Plan (LCWIP) as proposed in Section 9.5 of the Vision: <i>'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'</i>
397958	F	Vernon		5.11	Object	a) For gateway 3, include reference to the existing cycle specific lights between B2237 and Springfield Road and the (very short) contraflow cycle track on Springfield Road. b) Cycle access from Springfield Road through to the bus station is legal, and needs to be clearly marked to improve safety for both pedestrians and people on bikes.	Noted. The suggestions made are welcomed and will form part of the future debate on the development of the LCWIP working with HDCF and key partners.
397958	F	Vernon		6.1	Object	There is a need to include reference to access by cycle in this section e.g. a) First sentence to include: 'and most importantly pedestrian and cycle crossings'. b) Second sentence to include: 'potentially the introduction of an additional pedestrian and cycle crossing on the northern side of Bishopric.' Cycle access east/west from Freshwater Parade to the Lynd Cross should be provided with marked cycle tracks, together with a cycle slip road from Albion Way southbound to outside the Olive Branch pub. This will increase footfall in the area and increase safety for both pedestrians and those on bikes.	Noted - see above responses.

397958	F	Vernon		6.11	Object	<p>Include reference that this area has a travel function for people walking/cycling as well as a meeting function.</p> <p>Cycling is legal here, so to both increase footfall and improve safety in the area, marked cycle tracks are needed both north/south (Springfield Rd to the bus station) and east/west (Lynd Cross to Freshwater Parade).</p> <p>Partnership working between HDC and WSCC is needed here, as WSCC is currently preparing a feasibility study on cycle access in Horsham town centre. This would increase the potential funding for the town vision.</p>	Noted - see above responses.
397958	F	Vernon		5.1	Object	<p>Add reference that there is no cycle access provided at Gateway 2 and Albion Way is a significant barrier for those on bikes.</p> <p>There is opportunity to improve this through:</p> <p>a) a new cycle crossing on the Bishopric north side</p> <p>b) a cycle slip road from Albion Way (southbound) to the Bishopric north side (by the Olive Tree pub)</p> <p>c) an east/west cycle track from Albion Way to Lynd Cross.</p>	Noted - see above responses.
397958	F	Vernon		7.14	Object	<p>Note that Blackhorse Way is the only east/west cycling route across the town centre as cycling is prohibited in West Street.</p> <p>It is vital that two-way cycling continues to be permitted along this road.</p>	Noted - see above responses.
397958	F	Vernon		7.22	Observation	<p>I very much support the idea of traffic reduction on Blackhorse Way by making it partly one-way for vehicles. However this MUST include a contraflow cycling track as this is the only east/west cycle route in the town centre.</p>	Noted - see above responses.
397964	P	Ayerst	Horsham District	Summary	Object	<p>This is a summary of Horsham District Cycle Forum response to the Vision (sheet 1 of 4). The full version has been submitted by email.</p>	Noted. The Council is committed to the development of a Local Cycling and Walking Investment Plan (LCWIP) as proposed in Section 9.5 of the Vision: <i>'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'</i> The plan will address cycling provision across the Town Centre and include consideration of the suggested proposals. A full response has been given above
397964	J	Steele		Overall response to wh	Observation	<p>The full version of Horsham Society's response has been submitted by email, offering our analysis of the Vision, what it should have covered, the Society's proposals and our detailed paragraph response.</p>	Noted. A full response has been given above.
398154	L	Langridge		5.43	Object	<p>Management teams cost the taxpayer money we are told we don't have.</p> <p>An image can be created by the suggested route of controlling ugly retail signage; the obvious example is TK Maxx which blights the look of the Forum.</p> <p>Putting a few attractive 'historic looking signs on key buildings with 'Horsham Gateway to the South Downs' could be enough to suggest to visitors and residents we are a good access point to visit the Downs.</p>	Noted.
398206	L	langridge		6.6	Object	<p>It is important to recognise that the Sainsburys area and its carpark are extremely popular and support access to the library, town centre, Dunelm AND to John Lewis. Residents from the South of Horsham on lower incomes use Sainsburys often on foot to get groceries and this should be encouraged.</p> <p>Resiting Sainsburys would be a disaster. It might lead to Tesco's being a more attractive proposition to shop and therefore reduce the numbers who go into town and use its shops and services.</p>	Noted and Agree. Following the 'Vision Exhibition' consultation responses the Council will <u>not</u> be exploring ideas to develop Sainsbury's or the car park and appreciate this is a key town centre use which should be retained in its current form.
398240	L	langridge		4	Object	<p>In the SWOT analysis; clarity is required; what is 'experiences based' leisure?</p> <p>There is comment on moving towards 'leisure focussed town centre uses'</p> <p>What uses? More restaurants? more cinemas? Do we need more restaurants?</p> <p>The population is getting more obese and we are encouraging people to think of 'eating' as leisure if we keep developing areas with restaurants.</p>	Noted. Retail shopping patterns are changing as are people's attitudes, particularly with the growth of internet shopping. For town centre's to survive and compete with neighbours they must offer more than just shops but restaurants, cinema and other leisure or sport activities together with a variety of markets and family events. The Carfax is normally used as the main events space with a Council organised annual programme of events such as Piazza Italia, the Big Nibble and AmeriCARna as well as the weekly markets.
398318	L	langridge		6.35	Support	<p>The Bishopric is in need of a makeover; the ugly signage of Wilkies/Argos etc needs to go. Whilst a cinema complex and restaurants etc is not 'diversifying the town centre' only adding on to what is already available. A new leisure use which is alluded to in the SWOT is that an events space is required. This would be the perfect location for it.</p> <p>This area needs new life and a new leisure facility; an events space.</p>	Noted. Following all the feedback the Council will develop and consult on more detailed proposals in due course. Section 9.5 of the Vision refers: Bishopric (1) Eastern area (Albion Way-West Street, including Springfield Rd and Worthing Rd axis): Develop a detailed scheme to improve the public realm and increase connectivity to John Lewis at Home and Waitrose.

398332	L	Langridge		9.4	Support	<p>SD1 - The Horsham Vision needs to consider the younger population; there is no provision for leisure facilities for teenagers.</p> <p>There are huge numbers of teenagers with little to do. The current leisure facilities are costly (£10 for a cinema ticket; the gym at the Pavilions is £7.50), there is nothing provided free of charge or at a price a teenager can afford. The SWOT mentions that the town is unaffordable to young people/lower wage earners.</p> <p>This needs to be addressed.</p>	<p>Noted. Horsham Park provides active and general recreational activities including a skate park, table tennis table which are free to use. If you are a cyclist or enjoy walking then are numerous trails to explore such the popular Riverside Walk. There is a Youth Centre located in Hurst Road which also provides a range of Youth information and support services. There are many opportunities to get involved with local community groups as well as traditional groups such as the Scouts and Guides or you could become a volunteer. The Council also provides a full sports development programme - visit: https://www.hdsd.org.uk/</p>
398594	B	Edes		1	Observation	<p>Providing worthwhile comment on a Vision Statement that is so long and muddled is impossible, especially since it mainly words and contains few images that illustrate a vision of anything. As a design professional, my response to what is being proposed is that it lacks vision and is really just a sticking plaster solution applied to the current ailments of Horsham. Paving Patterns and Painting up a Subway is not a Vision.</p> <p>The problem stems from the way HDC has chosen to commission this piece of work. It has consulted with a land use company rather than a proper design led organisation, and it is for this reason that the output is sadly, dull, without aspiration and not inspiring. It is great design thinkers that challenge the status quo and come up with the exciting ideas that make great places and spaces for people to inhabit and enjoy. They challenge convention. One only has to look at the best and most exciting places in the world to see that generally they defy the commonplace. They are unusual and special, where old sits side by side with new and unexpected . The counter position is always that this kind of thinking is expensive but really that is just an excuse that panders to mediocrity. If you talk to the forward thinking developers and retailers they would far sooner engage with a place that differentiates itself from the normal and mundane 'Every Town', with all its chain restaurants and high street multiples. Why are the Lanes in Brighton so successful ? You wouldn't start out with a series of tiny alleyways but it is that unconventional environment that is the catalyst to great place making. Not enough space here to explore the issues but come on Horsham, lets raise our game !!</p>	<p>Noted. The objective of the Vision is to establish an aspirational, comprehensive and deliverable medium term strategic vision (10-15 years) for Horsham Town Centre. The Vision is not about providing an instant proscriptive design solution. The sketches and illustrations have been used to generate a broad discussion on future directions. It should be noted that the Council cannot require landowners to bring forward particular development proposals, but it can guide and inform them. Section 9.5 of the Vision encapsulates how the Council will take the Vision forward to the next stage, working with stakeholders, to develop detailed proposals. For example a Public Realm and Walking and Cycling Strategies as well as progress individual regeneration projects, such as the Bishopric and Blackhorse Way. The Council will fully consult on these proposals in due course based on the feedback we have received from the exhibition and the Vision document. The Vision clearly sets out a rational approach by analysing current socio-economic factors, key market reviews supported by Transport, Retail and Visitor accommodation studies to build up a clear picture of the strengths, weaknesses and opportunities and threats that face the town centre. Strategic Directions have been developed and consulted on as a consequence. We have investigated key sites and engaged with current landowners to gauge future opportunities. From all this work the Vision then details a schedule of projects to be worked up in detail going forward which will form part of the continuing discussion on the development of the town centre.</p>
398699	D	Moore		7.7	Object	<p>The Horsham Town Vision report dated August 2017 is disappointing. It revisits past ideas and identifies known problems but doesn't offer any integrated solutions. For example, it identifies the problems associated with crossing Albion Way and seems to think that the provision of additional pedestrian and cycle crossings is the answer (see paragraph 7.63). Nothing could be further from the truth.</p> <p>The more sensible approach to crossing Albion Way is identified in the penultimate sentence of paragraph 7.70, namely the realignment of Albion Way. However, it ignores the fact that this was what was supposed to happen when planning permission was granted for the Waitrose / John Lewis development and was subsequently rejected. The result was that the Waitrose / John Lewis development became an edge of town development rather than what was originally envisaged, namely a town centre development. Consequently, a visit to the development seems to have become a single stop visit.</p> <p>This tends to show what can result from a non-integrated approach to town centre planning.</p>	<p>Noted. The objective of the Vision is to establish an aspirational, comprehensive and deliverable medium term strategic vision (10-15 years) for Horsham Town Centre. The Vision is not about providing an instant proscriptive design solution. The sketches and illustrations have been used to generate a broad discussion on future directions. It should be noted that the Council cannot require landowners to bring forward particular development proposals, but it can guide and inform them. Section 9.5 of the Vision encapsulates how the Council will take the Vision forward to the next stage, working with stakeholders, to develop detailed proposals. For example a Public Realm and Walking and Cycling Strategies as well as progress individual regeneration projects, such as the Bishopric and Blackhorse Way. The Council will fully consult on these proposals in due course based on the feedback we have received from the exhibition and the Vision document. The Vision clearly sets out a rational approach by analysing current socio-economic factors, key market reviews supported by Transport, Retail and Visitor accommodation studies to build up a clear picture of the strengths, weaknesses and opportunities and threats that face the town centre. Strategic Directions have been developed and consulted on as a consequence. We have investigated key sites and engaged with current landowners to gauge future opportunities. From all this work the Vision then details a schedule of projects to be worked up in detail going forward which will form part of the continuing discussion on the development of the town centre.</p>
398690	D	Moore		7.7	Observation	<p>There are other problems and risks associated with the Horsham Town Vision report and some of these are shown below.</p> <p>1○The report talks about the importance of Carfax being kept as part of the town centre but it doesn't offer any real suggestions as to how this might be achieved. In reality, Carfax seems to be ignored in the report and the proposals appear to seek to move the town centre to Lynd Cross.</p> <p>2○Lynd Cross is currently a pleasant and relaxing area in what is becoming more and more a busy town centre. All successful town centres need quiet spaces within them and Lynd Cross currently provides such a space.</p> <p>Of course it can be improved. However the suggestion that because the trees and planting beds create a visual and physical barrier, presumable to the traffic on Albion Way, means that they should be removed is unbelievable.</p> <p>Nobody would choose to shop in Horsham so that they have a wonderful view of the traffic moving along Albion Way and up the Guildford Road. The suggestion also ignores the acoustic screen effect that the trees provide and the ability of the vegetation to absorb some of the increased pollution that would result from vehicle exhaust fumes if Horsham attracted more people to its shopping experience.</p>	<p>Noted. Following all the feedback the Council will develop and consult on more detailed proposals in due course. Section 9.5 of the Vision refers: Bishopric (1) Eastern area (Albion Way-West Street, including Springfield Rd and Worthing Rd axis): Develop a detailed scheme to improve the public realm and increase connectivity to John Lewis at Home and Waitrose. There was overall support to retain and enhance the current planting and water features. The Carfax remains the centre of Horsham and the Council run a full programme of events throughout the year from Piazza Italia to the Big Nibble and weekly markets etc.</p>

398690	D	Moore		7.7	Object	<p>3◦A need for additional crossing points from the town centre to Horsham Park is proposed with out any justification. There's already a perfectly adequate under Albion Way crossing and another entry route from Carfax via North Street into Horsham Park.</p> <p>4◦The consideration of the possibility of putting housing onto the site currently occupied by Sainsbury's doesn't make a lot of sense. The only beneficiary of such a step would be Waitrose and it's highly likely that footfall into the town centre would reduce.</p> <p>Difficult to understand why Queen Street should become another shopping area. It's not a very attractive area for a shopping experience due to the ghastly appearance of the railway bridge. Surely, this area would be better developed for housing, as has already happened with the flats in Denne Parade and the flats on the site of the old Inland Revenue offices.</p>	Disagree: The Vision states ' <i>Crossings across Albion Way should be reviewed for all the key gateways to the town centre. Currently, links between the town centre and Horsham Park are poor, which diminishes the potential mutual reinforcement between the two. There may be the potential to improve existing crossings, and/or introduce new ones.</i> ' Sainsbury proposals are not being explored further in response to comments received. Queen Street is a local convenience shopping parade and also provides cheaper rental premises than in the town centre which benefit some independent retailers. The Vision proposes at Section 9.5 to: <i>Town Centre – East: Progress Queen Street/Iron Bridge improvements, eastern gateway and links to East Street to include supporting retail function and area identity.</i>
398608	J	Cole		para 7.61	Observation	With your reference to tree planting in the West street/Bishopric side of town, this should be an 'events' area and there should be no permanent fixtures (e.g.. trees in pots as an alternative to planted trees and moveable stone benches.)	Noted. Following all the feedback the Council will develop and consult on more detailed proposals in due course. Section 9.5 of the Vision refers: Bishopric (1) Eastern area (Albion Way-West Street, including Springfield Rd and Worthing Rd axis): Develop a detailed scheme to improve the public realm and increase connectivity to John Lewis at Home and Waitrose. It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature.
398768	L	Thomas	voluntary group	5.35	Observation	When referring to specific areas of the town, surely the photographs should be contemporary? This picture of West Street is out of date, for instance featuring its previous lively and much appreciated floral displays.	Noted.
398768	L	Thomas	voluntary group	5.42	Support	I agree that car parks are necessary but usually ugly. I agree that screening and general imagination should be used to integrate them more fully into a townscape. I cannot comment on the necessity for more car parks as I am not a statistician.	Noted. The Council is proposing to replace Piries Place car park with a better looking and usable car park to meet future demand and address the current layout issues.
398768	L	Thomas	voluntary group	7.65	Observation	I would argue that there are already some cycle rails on the town side (at right angles to the Swan Walk car park approach and just above the underpass). Plus an ugly and unusable rack outside Boots - by all means convert all these racks into something both attractive and functional.	Noted.
398768	L	Thomas	voluntary group	7.49	Object	The descriptions of plans to enhance the Queen Street area (generally sympathetic and taking into account local history and remaining buildings) seem at odds with the urban 'large scale' sketch which bears no relation to domestic architecture.	The image is just a sketch to prompt a discussion on how the Queen Street area could or should be improved. Feedback is almost wholly supportive of making improvements to the area, particularly the bridge.
398768	L	Thomas	voluntary group	7.5	Support	Generally I support the idea of sympathetic development of the River Arun corridor, not by taking green space, but as I understand is being suggested, the re-development of existing office or retail buildings. I approve of the way the Prewetts Mill development is sympathetic to the area and its history. What remains of the rural aspect could be made more accessible and attractive to all.	Support noted.
398768	L	Thomas	voluntary group	7.62	Observation	I would say it is mainly the railings/Albion Way which cut off sight lines and access between the two areas of the town. It was a popular part of town, but rather marooned. Anything that improves the flow and that crossing to Freshwater Parade/approach to Waitrose/John Lewis must help flow through the town.	Noted. Many Council's, particularly, in more urban areas have started to remove barriers to improve access and the appearance of streets. The Vision proposes at section 9.5 to ' <i>Develop a 'holistic' town centre public realm strategy that addresses:</i>
							<ul style="list-style-type: none"> • <i>Character spaces (such The Carfax)</i> • <i>Linkages, connectivity and movement between spaces</i> • <i>Wayfinding and signage</i> • <i>Development and design guide</i> • <i>Public realm materials and street furniture palette</i> • <i>Gateways, pedestrian crossings and underpasses</i> • <i>Public art.</i>
398768	L	Thomas	voluntary group	7.67	Support	I have never thought about this access, even though I cross it frequently by foot and by cycle. It is awkward and quite dangerous with such a tight corner. Also surrounded by some ancient Horsham buildings. So I would be in favour of something sympathetic to pedestrians here.	Noted. The Council will explore with WSCC the provision of a zebra crossing at the junction of East Street and Denne Road.
398768	L	Thomas	voluntary group	7.14	Support	Few people could surely disagree with this summary of the very long-standing issues with Black Horse Way. The current crossing is so dangerous as it is such a popular route into town, the line of people wanting to cross is often almost constant. So dangerous with the constant flow of buses and delivery lorries. Let alone the well documented issues with commercial waste bins. Yes please, do improve it, this area lets the town down so badly as well as being dangerous for pedestrians and cyclists.	Agree. The Vision proposes: <i>Blackhorse Way (1) – Develop a waste and servicing arrangements strategy to address overall management and appearance.</i> <i>Blackhorse Way (2) – Assess one way traffic options and develop scheme to reduce traffic flows and improving pedestrian facilities, including the West Street to Forum link, and upgrading the public realm.</i>

398768	L	Thomas	voluntary group	6.45	Object	Please leave the library where it is and even expand it. Though their sites are relatively popular and accessible and have the benefit of Forum and Sainsbury's parking, CAB and possibly Orchard Surgery may need to re-locate given the growing population and their own need to expand.	Noted. While the quality of the existing library is noted there are no proposals to replace it at present. The Council together with West Sussex County Council are seeking to look at the future needs of the library and the opportunities to provide a better facility and develop the library area together with the Dr's surgery which is at capacity and needs more space to meet existing and future demand for local health services. The County Council are also looking in future to provide more services to residents in libraries as these are very popular - Horsham library received over 360,000 visits last year. Any proposed scheme would need to be developed, designed, tested and refined using appropriate evidence and would also need to be subject to a detailed business case, public and statutory consultation before being implemented. The Council and County Council would carry out detailed consultation on any changes to library services, the building and the area in general.
398768	L	Thomas	voluntary group	4.1	Support	Agree with comments about cycle access, routes, signposting under Tourism. Also all amenities (e.g. Horsham museum) and countryside sites (e.g. Chesworth Farm in close proximity to Arun corridor/town centre) need better signposting. In Weaknesses, the first reference to poor access for pedestrians is a point brought out throughout the document and I agree. Signposting, sightlines, access, poor or uneven surfaces (many of them brought in in the last 30 years - so don't have historic credentials) the pedestrians do rather get a poor deal despite this being a market town - which suggests a person-orientated lifestyle.	Support noted.
398830	E	Delves		2.2	Observation	<p>Horsham Town is not just an economic and cultural centre. It is also residential, and the quality of life of local residents MUST always be considered.</p> <p>Your document talks about development only being permitted where it retains and enhances green spaces. This is of paramount importance. Green space must not be over-developed and must at be preserved and enhanced over and above development. Funds must be made available for planting, flowers, trees etc wherever possible and these spaces should not be eroded.</p> <p>With this planning policy in mind, Horsham Park is case in point. The much objected to Ice Rink is not appropriate in its current location and in no way enhances or retains green space - it has destroyed it and the Council is seeking to permanently take this over and hard-scape it, therefore taking away this green section of the park for ever. The area it is in and the areas surrounding are being damaged, wildlife is being affected and the quality of life of local residents, not 50 metres away will also be adversely affected. The increase in traffic through the North Street Subway and in the BT car park will likely have a detrimental effect on the residents of the listed houses between these two areas.</p> <p>It is important to consider Horsham Town's uniqueness and to be extremely careful not to homogenise it. Any future building should have unique design or heritage features to prevent Horsham at any stage in the future looking like any other town, such as Crawley or Croydon.</p>	Noted. The current planning permission is temporary. Time Condition: The proposed temporary use of the land for an ice skating rink hereby permitted shall only operate between the dates of 20th October 2017 and 28th January 2018. Thereafter, the use shall be discontinued and the land and existing access paths shall be restored to their original condition .
398830	E	Delves		6.27	Object	Regarding the thoughts about future parking. The considerations to take the RSA car park and build a multi-storey are absolutely unacceptable. Access is extremely limited, plus it is in a largely residential area. It will hugely impact the houses and flats nearby and will likely spoil the skyline, removing some residents views of the open sky. One of the listed buildings on the plan is from 1400. It is one of the most historic buildings in the area and it is highly likely that it will suffer irreparable damage caused by the vibrations of such a development and the constant to-owing and fro-ing of cars. Plus, the noise and the pollution which will come from such a development could have a detrimental effect on the health of people living nearby. There are already numerous car parks in Horsham Town plus a park and ride facility which surely must be optimised.	<p>Disagree. The Vision sets out some options and ideas about how sites could be developed but no plans have been approved to remove New Street Gardens and the concerns are understood. Paragraphs 6.61 to 6.66 consider possible options that could be further explored in relation to the RSA and Station car parks. It is only noted at paragraph 6.62 that development of the RSA site to provide both additional parking and housing would require the provision of additional access via New Street Garden.</p> <p>Paragraph 6.63, alternatively, explores increasing car parking alone. Paragraph 6.66 explores the option of combining both car parks and states that if considered together additional access may not have to be relied on. The whole section looks at possible options and constraints only.</p> <p>The Vision's Delivery Schedule at section 9.5 proposes: 'Horsham Station/Royal Sun Alliance car parks – Explore options and develop schemes to increase parking capacity and potential for additional residential provision and explore options for public use of car park'.</p> <p>The Council will work with landowners to assess future potential for additional parking and/or residential development and the public would be fully consulted on any proposals, should they come forward. It should be noted that the two sites are constrained and any proposed development will need to be carefully assessed in relation to any impacts on neighbouring properties, open space and the local road network.</p>

398848	M	Blick		4	Observation	If an events space is required I believe that this will be best supported if sited in the town centre rather than in the park. Little or no disturbance to green space would be necessary if this events space was sited between the Bishopric and West Street for example.	Noted. The current planning permission is temporary. It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature and unlikely to accommodate an ice rink.
398848	M	Blick		6.35	Observation	Could the required events space be sited here?	It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature.
398848	M	Blick		7.61	Observation	I fully support the proposal for additional trees in the space between West Street at the Bishopric, however if these were placed in large pots it would be possible to enjoy them for most of the year and yet still be able to move them in the case of an event.	Noted.
398860	A	Farrell		4	Observation	I like the idea of events to draw people in to the town centre. In order to maximize the benefit for business it is important for the events to be as near as possible to the heart of the shopping centre. Close to the Forum or the open space at the end of Bishopric West Street would be ideal and give good access from the car parks at that end of town.	Noted. The Carfax is the usual events space with the bandstand and wider open area. It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature. The Forum has significant weight restrictions due to its method of construction.
398860	A	Farrell		6.35	Observation	This area would be ideal for an event space, encouraging additional footfall for the major retail businesses such as John Lewis, Dunelm and Sainsbury's. People travelling specifically for events would find parking at the stores and so be encouraged to spend there; regular shoppers would be encouraged to use this area by the atmosphere created by the events.	It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature.
398860	A	Farrell		7.61	Observation	As this area is an ideal location for holding events, any features should be capable of being moved to produce a suitable staging area. It should be possible to have portable trees, lighting and outdoor furniture to accomplish this.	Noted - see above response.
398860	D	Dunnington		4	Observation	Events are a marvellous way of attracting tourism and encouraging residents into the town centre. As that is the central aim, it is vital that events are held close to the shopping hub. The former site of the Shelley fountain would be ideal for this. That area is also close to the main town centre car parks.	It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature.
398862	D	Dunnington		6.35	Observation	Since this area will effectively be the heart of the town, it is an ideal place to hold events to draw people in to this area. This is the best way to generate additional footfall for town centre businesses and shops.	Noted. The Carfax is the usual events space with the bandstand and wider open area. It should be noted that sufficient access for emergency vehicles needs to be maintained along Springfield Road, Worthing Road and West Street at the junction with the Bishopric. So any events space would be compact in nature. The Forum has significant weight restrictions due to its method of construction.
398862	D	Dunnington		7.61	Observation	Please consider making trees, benches and lighting portable in this area. It can then be a flexible space for holding events and markets. This would encourage shoppers and tourists into the new heart of Horsham.	Noted.
403488	G	Sitton			Object	There are no policies reference to pedestrians, cyclists or mobility scooters in the Horsham Planning Framework, nor do you take any notice of the W.S.C.C. SUSTAINABILITY STRATEGIES, TRANSPORT PLAN AND THE ESSENTIAL NEED TO INCREASE CYCLING IN ALL FORMS	Disagree. While the documents referred are important in their own right the Vision is not a statutory planning document. As considered above in the detailed response to Cycling Forum the County and National strategies referred to will form part of the proposed Local Cycling and Walking Infrastructure Plan that the Vision proposes to develop as part of the Delivery Schedule at section 9.5. It should be acknowledged that each project is a major and detailed area of work in itself. What the draft 'Vision' establishes, following the baseline analysis, exhibition and consultation is a broad consensus on the way forward in terms of the Strategic Directions and the key Opportunity Areas and sites. The Council will work with key partners as described, including the HDCF, building on the successful Cycling Summit held in October 2017. The HDCF have been made aware during direct contact and through the exhibition details the scope and remit of the 'Vision'.
403488	G	Sitton			Object	Why no reference to the current cycle track on the contra section?	Current cycle routes will be fully mapped as part of the proposed Local Cycling and Walking Infrastructure Plan.

403488	G	Sitton		Object	Town entrances should be enhanced to ensure safe access by disability scooters, cycles and walking. We seem to be compelled for some reason to design in cars. Why? If this is a vision for the future, most commentators now assume that car ownership will decline, we will use cars as and when and not many will actually OWN as they will be available 'to hire' also, self driving cars will proliferate which need to be catered for.	Agree. The Vision proposes at section 9.5 to 'Develop a 'holistic' town centre public realm strategy that addresses: • Character spaces (such The Carfax) • Linkages, connectivity and movement between spaces • Wayfinding and signage • Development and design guide • Public realm materials and street furniture palette • Gateways, pedestrian crossings and underpasses • Public art.' and a Local Cycling and Walking Investment Plan (LCWIP) as proposed in Section 9.5 of the Vision: 'Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre.'
403488	G	Sitton		Object	Where it mentions 'potentially' - rather doesn't, then you need to add in that pedestrian and cycle and disability scooters need to be not only catered for but a longer period should be allowed for crossings and additionally, the crossing need to be more responsive in that they actually react to people crossing the road, not simply indicate its ok to cross when the traffic is held for counter traffic to use the road. Definitive markings on the surface of Lynd Cross to depict non petrol mobility transports can be routed should be incorporated to ensure walkers are aware that wheeled modes of transport use the route. A well marked provision from Albion Way to the Olive Branch would be of tremendous use.	Noted. The Council is aware of the many concerns that have been expressed in relation to the new crossing and will explore improvements with WSCC as part of the Vision: Bishopric (1) Eastern area (Albion Way-West Street, including Springfield Rd and Worthing Rd axis): Develop a detailed scheme to improve the public realm and increase connectivity to John Lewis at Home and Waitrose. Bishopric (2) – Western area (Albion Way-Rushams Rd): Progress a detailed scheme to enhance public realm, western gateway and support retail function.
403488	G	Sitton		Object	Marked cycle/disability scooter markings need to be prominently marked, and the markings regularly maintained. Why no reference to W.S.C.C. efforts to make safe non motorized wheeled provision?	Noted.
403488	G	Sitton		Object	As it is proposed, it is totally flawed. Cycling and disabled scooters will ignore the one way indications, therefore two way provision, suitably marked must be made to prevent an inevitable fatality.	Noted. See above response.
403488	G	Sitton		Support	Excellent suggestion, but this to be coupled with reduction of commercial vehicles - in fact any motorized vehicle other than taxi, minibus, blue badges and the like, bus and emergency vehicles during the normal working day. This has the possibility of increasing footfall as the Carfax would be a far more pleasant space to go to.	Support noted. Vision proposes: <i>Blackhorse Way (2) – Assess one way traffic options and develop scheme to reduce traffic flows and improving pedestrian facilities, including the West Street to Forum link, and upgrading the public realm.</i>
403488	G	Sitton		Object	A new dedicated disability scooter and cycleway is essential from the Bishopric to the Olive Branch. Also to reduce pollution in Blackhorse Way dual carriageway, work with W.S.C.C. to synchronize traffic lights to allow traffic to 'breeze through' rather than continual stop/start at the various lights. This works very well in other countries and reduces significantly the pollution from start/stop of vehicles which use more fuel when starting from stationary.	Noted. The Council is aware of the many concerns that have been expressed in relation to the new crossing and will explore improvements with WSCC as part of the Vision: Bishopric (1) Eastern area (Albion Way-West Street, including Springfield Rd and Worthing Rd axis): Develop a detailed scheme to improve the public realm and increase connectivity to John Lewis at Home and Waitrose. Bishopric (2) – Western area (Albion Way-Rushams Rd): Progress a detailed scheme to enhance public realm, western gateway and support retail function.
403606	G	Sitton	4 -A	Observation	this has to be actually within the town centre and thus close to shops - e.g. at the western end of West Street	Noted.
403606	G	Sitton		Observation	Ideal position for a permanent events space	Noted.
403606	G	Sitton		Support	Absolutely, any increase in planting is to be applauded. It benefits every living thing! However, this has to be done sympathetically with having the events space located there.	Support noted.

Comments received after close of consultation on 09.11.17

New Street Neighbourhood Action Group	Recommended Council Response
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7.1	<p>1. We oppose any plans that may lead to the partial or complete destruction of New Street Gardens</p> <p>On page 71, section 6.61 of the document, the case is made to remove New Street Gardens to provide access to a new residential development and multi-storey car park on land that is currently used as RSA / Horsham Station car parks.</p> <p>Not only would this remove a much used and valued community garden, it goes against the Council’s own planning policy to “retain, enlarge or enhance the existing formal and informal green spaces a within the town” (as referred to in section 2.3 of the document).</p>	<p>Disagree. The Town Centre Vision statement for the future of Horsham sets out some options and ideas about how the Royal Sun Alliance (RSA) and NR Station car park sites could be developed, but no plans have been approved to remove New Street Gardens and the concerns of local residents are understood. In a detailed response, the council highlights the following:</p> <ul style="list-style-type: none"> • Paragraphs 6.61 to 6.66 of the Vision Statement consider possible options that could be further explored in relation to the RSA and NR Station car parks. It is only noted at paragraph 6.62 that development of the RSA site to provide both additional parking and housing would require the provision of additional access via New Street Garden. • Paragraph 6.63, alternatively, explores increasing car parking alone with no impact on New Street Gardens. • Paragraph 6.66 explores the option of combining both car parks and states that if considered together additional access may not have to be relied on. The whole section looks at possible options and constraints only. • The Vision’s Delivery Schedule at section 9.5 proposes: ‘Horsham Station/Royal Sun Alliance car parks - Explore options and develop schemes to increase parking capacity and potential for additional residential provision and explore options for public use of car park’. <p>The council will work with landowners to assess future potential for additional parking and/or residential development and the public would be fully consulted on any proposals, should they come forward. It should be noted that the two sites are constrained and any proposed development will need to be carefully assessed in relation to any impacts on neighbouring properties, open space and the local road network.</p>
7.2	<p>2. We oppose any plans that may lead to a significant increase of road traffic on New Street and surrounding roads</p> <p>Access to a new residential development via New Street would place significant additional strain on the already over-congested roads and parking infrastructure in the local area. New Street and surrounding roads are narrow, with on-street parking further restricting the flow of traffic. On New Street in particular, parking bays either side of the road create chicanes, making it particularly difficult and dangerous to navigate for pedestrians and road-users alike. It is already used as a short-cut between south and north Horsham, and if this development were to go ahead, the situation would only get worse. It is worth noting that the Winterton Court development currently under construction is already likely to significantly add to the congestion problem.</p>	<p>Noted - see above response.</p>
7.3	<p>3. We want to ensure that a valuable community focal point and wellbeing resource is preserved</p> <p>The garden is used on a daily basis by local residents and families, particularly as most of the gardens of houses in the neighbourhood are very small. It is also frequently used by a wide range of community groups to hold events (e.g. Halloween, Christmas, Easter, neighbourhood parties and gatherings). It provides a unique space to foster social cohesion, positive community relations and wellbeing - something that the Council should seek to put at the heart of its vision for the Town.</p>	<p>Noted - see above response.</p>
7.4	<p>4. We challenge the inference that consultation responses are in support of the plans</p> <p>The Consultation Responses Summary Analysis document states that on the subject of “Station and RSA Car Parks: Overall 51% support the idea, with 21% strongly in support, of trying to increase parking provision with or without possible additional housing. However 32% were neutral with 12% disagreeing and 5% strongly so.”</p> <p>We note that the total number of responses to the survey was 164. This is in no way statistically representative of the population either at a Parish or Town level (to give an order of magnitude, 164 respondents represents 0.3% of Horsham’s 45,000 residents). A mere 82 positive responses cannot reasonably be upheld as legitimate support for the proposed plans, and such a statistically insignificant number of consultation responses should be treated with caution by the Council when considering support for this and the broader plans laid out in the draft Vision document.</p> <p>We also note that in the Town Hall Vision exhibition posters there was no reference whatsoever to the proposal to remove a green space as a consequence of developing the RSA car park site – had this been made clear, it may have changed the views of the few respondents who took part. (https://www.horsham.gov.uk/__data/assets/pdf_file/0009/47772/Vision-Exhibition-2017-Consultation-Responses.pdf)</p> <p>Furthermore, the Council’s Statement of Community Involvement states that the Council will notify local groups and organisations potentially impacted by proposed planning policies (including open space organisations). However, the Friends of New Street Gardens group were not formally made aware of the proposed plan to remove the garden and develop the site adjacent to it.</p> <p>In fact, none of the local residents or community groups in the surrounding area whom we have spoken to knew anything about the plans, and the Council should expect to hear more from concerned residents and other interested parties in the coming days.</p>	<p>No plans are being proposed at this stage and as stated above the Council are looking to explore possible options with the landowners. These options may not be realistic or achievable. If an option were to be progressed it would have to be subject to all normal statutory consultation processes and require planning permission and adherence to relevant planning policies contained within the Horsham District Planning Framework 2015. It is noted that the two sites are constrained and any proposed development will need to be carefully assessed in relation to impacts on neighbouring properties, open space and the local road network. The Council held the Exhibition of Vision ideas over a weekend in Swan Walk shopping centre receiving over 1100 visitors. The Exhibition transferred to Horsham library for a month and was extensively covered in all the local press including lengthy articles in the West Sussex County Times. All Neighbourhood Council's were directly advised and invited to the Exhibition opening. Survey responses were equally spread over all age ranges and is considered to be representative.</p>
Friends of New Street Garden		Recommended Council Response

8.1	<p>Friends of New Street garden strongly oppose the option set out in 6.61 of the document to develop the current car park behind the garden into residential and multi-story car park on RSA and/or station car park. This option for development would involve the loss of new street garden, which would become an access road for the new development.</p>	<p>Disagree. The Town Centre Vision statement for the future of Horsham sets out some options and ideas about how the Royal Sun Alliance (RSA) and NR Station car park sites could be developed, but no plans have been approved to remove New Street Gardens and the concerns of local residents are understood. In a detailed response, the council highlights the following:</p> <ul style="list-style-type: none"> • Paragraphs 6.61 to 6.66 of the Vision Statement consider possible options that could be further explored in relation to the RSA and NR Station car parks. It is only noted at paragraph 6.62 that development of the RSA site to provide both additional parking and housing would require the provision of additional access via New Street Garden. • Paragraph 6.63, alternatively, explores increasing car parking alone with no impact on New Street Gardens. • Paragraph 6.66 explores the option of combining both car parks and states that if considered together additional access may not have to be relied on. The whole section looks at possible options and constraints only. • The Vision's Delivery Schedule at section 9.5 proposes: 'Horsham Station/Royal Sun Alliance car parks - Explore options and develop schemes to increase parking capacity and potential for additional residential provision and explore options for public use of car park'. <p>The council will work with landowners to assess future potential for additional parking and/or residential development and the public would be fully consulted on any proposals, should they come forward. It should be noted that the two sites are constrained and any proposed development will need to be carefully assessed in relation to any impacts on neighbouring properties, open space and the local road network.</p>
8.2	<p>We strongly oppose the loss of our local green space. A green pace for local residents to use New Street Garden is a small local green space used by many residents – adults and children - in New Street, Clarence Road, Devonshire, Oxford, Cambridge and Oakhill Road. It is a great place for local families and residents. The gate can be shut meaning that small children can run around and explore in safety or enjoy a picnic and meet with the locals. This makes it different from the green space offer at Horsham Park. Older children often use the garden to kick a football about after school in a safe environment close to home. No garden or small gardens in the surrounding homes Many of the houses on New Street and surrounding streets have small gardens, the flats at Standings Court and planned at Winterton Court have no gardens, so New Street Garden provides a great green space for children to use. Additional housing in an already high density residential area As more housing, including large numbers of flats, is planned or under construction on or near New Street (Winterton Court, bottom of new street and Brighton Road, opposite side of Brighton Road) the demand for New Street Garden as a local community garden is likely to grow. Community events The garden is used for community events run by Friends of New Street Garden, such as the annual Halloween event, where hundreds of children from the local community gather for treats and parents catch up. This event has been running for 4 years. Friends of New Street Garden also run an annual plant sale and summer fun day. Local people often use the garden for picnics or gatherings. The Church use the garden for an annual carol service and summer event.</p>	<p>Noted - see above response.</p>
8.3	<p>We are very concerned about the current and future traffic and congestion on New Street Further development of an already densely populate area Plans for even more homes in this already densely populated area cause concerns about the additional volume of traffic coming onto and using New Street. There has already been recent high density development at the top of New Street with Standings Court and a large number of homes under construction at Winterton Court. New Street is not capable of taking any further traffic from another development coming onto it. Already severe issues with traffic on New Street. New Street already suffers from many traffic issues and a group of residents are already working with Councillor Nigel Dennis on solutions to the traffic issues on New Street, Oak Hill Road and the roads leading onto New Street.</p> <ul style="list-style-type: none"> - Severe congestion in the morning rush hour, with cars frequently mounting the pavement as children are using the pavement to walk to school. The part of road outside New Street Garden is particular congested as the road thins here. - Lack of visibility at all the junctions coming onto New Street (Devonshire, Cambridge, Oxford) causing road traffic accidents. - Speeding on New Street at non rush hour times in between the slalom car parking - Blind corner on Station Road outside the Bedford pub made worse by articulated vehicles delivering to One Stop - HGVs using New Street, rather than Clarence Road - Parking outside the chemists on Oakhill Road, obscuring vision of those crossing and those parking at the chemists reversing out into the busy Oakhill Road as school children crossing. 	<p>Noted - see above response.</p>
8.4	<p>We are very concerned about the pressures on local amenities as a result new housing developments. Pressures on local amenities such as schools, doctors, hospital, parks, the town centre and highways are already high within this densely populated area. Pressures are due to rise when the construction is complete at Winterton Court with another 60 plus home being built without any funding being put into these services due to viability, as I understand from the planning application.</p>	<p>Noted.</p>

D. McLachlan I object to the development of the RSA car park site as set out in the Horsham Town Centre vision document.

Specifically

I object to the loss of New Street garden, a well-used local green space (p. 71); and I object to the proposed residential/vehicle access through New Street garden onto New Street, as this would contribute to increased congestion and more 'rat runners' in the already congested surrounding streets.

Noted - see above response.

APPENDIX D

Section 9.5 Horsham Town Centre 'Vision' Delivery Schedule

Ref. No.	Project name & description	Strategic Direction Ref/Linked Strategies/Projects	Key Partners
1	<p>Public realm strategy: Develop a 'holistic' town centre public realm strategy that addresses:</p> <ul style="list-style-type: none"> • Character spaces • Linkages, connectivity and movement between spaces • Wayfinding and signage • Development and design guide • Public realm materials and street furniture palette • Gateways, pedestrian crossings and underpasses • Public art 	<p>SD6, SD7 Cycling & pedestrian strategy Economic strategy 2017-2027 Tourism strategy Opportunity sites</p>	<p>Horsham District Council ('HDC') West Sussex County Council ('WSSCC') Horsham Society Neighbourhood Councils Horsham District Cycling Forum ('HDCF') Horsham Town Community Partnership ('HTCP') Horsham Unlimited Horsham in Bloom</p>
2	<p>Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and movement within and around the town centre including making better use of the River Arun area.</p>	<p>SD6, SD7, SD2 Tourism strategy Sport and physical activity strategy 2016 to 2031</p>	<p>WSSCC Neighbourhood Councils HDCF Horsham Society HTCP Horsham Unlimited Horsham in Bloom</p>
3	<p>Promote image and identity: Develop a tourism and marketing strategy for Horsham and Town Centre including options for extending public Wi-Fi.</p>	<p>SD7, SD2, SD6, SD5 Economic strategy 2017-2027</p>	<p>HDC Neighbourhood Councils Horsham Society Horsham Unlimited HTCP Horsham in Bloom</p>
4	<p>Car parking strategy: Develop a car parking strategy to address future demand, management, access, usage and appearance.</p>	<p>SD6, SD2, SD1, SD3, SD5 Economic strategy Tourism strategy Retail strategy</p>	<p>HDC Neighbourhood Councils Horsham Society HTCP Horsham Unlimited</p>
5	<p>Station Quarter – Develop scheme to enhance public realm between Horsham Station and town centre including subways. Explore opportunities to expand hotel provision and assess options to market Park House as a 'boutique' hotel to be considered in conjunction with development proposals in Hurst Road.</p>	<p>SD2, SD6, SD7 Economic strategy Public realm strategy Hotel and Visitor Accommodation Study Tourism strategy</p>	<p>HDC WSSCC Neighbourhood Councils HDCF Network Rail Horsham in Bloom</p>
6	<p>West St/Forum link – Improve connectivity and appearance including the Blackhorse Way crossing.</p> <p>Blackhorse Way (1) – Develop a waste and servicing arrangements strategy to address overall management and appearance.</p> <p>Blackhorse Way (2) – Assess one way traffic options and develop scheme to reduce traffic flows</p>	<p>SD6, SD7 Public realm strategy Economic strategy Retail strategy</p>	<p>HDC WSSCC Neighbourhood Councils Horsham Society Horsham Unlimited HDCF HTCP Horsham in Bloom</p>

Ref. No.	Project name & description	Strategic Direction Ref/Linked Strategies/Projects	Key Partners
	and improving pedestrian facilities, including the West Street to Forum link, and upgrading the public realm.		
7	<p>Forum/Library (1) Western area – Explore potential and develop scheme to improve use of site with a Civic hub combining library, health and advice facilities and improve links to Worthing Road/Bus station.</p> <p>Forum/Piazza (2) Southern area – Explore potential and develop scheme to partially enclose with additional retail/residential uses and improve environmental conditions.</p>	<p>SD5, SD7, SD6 Public realm strategy Economic strategy Retail strategy</p>	<p>HDC WSCC Neighbourhood Councils Sainsburys Surgery CAB Horsham Society HTCF HTCP Horsham Unlimited Horsham in Bloom</p>
8	<p>Bishopric (1) Eastern area (Albion Way-West Street, including Springfield Rd and Worthing Rd axis): Develop a detailed scheme to improve the public realm and increase connectivity to John Lewis@Home and Waitrose.</p> <p>Bishopric (2) – Western area (Albion Way-Rushams Rd): Progress a detailed scheme to enhance public realm, western gateway and support retail function.</p>	<p>SD7, SD6, SD5, SD2 Public realm strategy Economic strategy Retail strategy</p>	<p>HDC WSCC Neighbourhood Councils Horsham Society HDCF Horsham Unlimited Horsham in Bloom</p>
9	Town Centre – East: Progress Queen Street/Iron Bridge improvements, eastern gateway and links to East Street to include supporting retail function and area identity.	<p>SD7, SD6 Public realm strategy Economic strategy Retail strategy</p>	<p>HDC WSCC Network Rail Neighbourhood Council Horsham Society Horsham in Bloom</p>
10	Horsham Station/Royal Sun Alliance car parks – Explore options and develop schemes to increase parking capacity and potential for additional residential provision and explore options for public use of car park.	<p>SD6, SD3, SD2 Car parking strategy Economic strategy</p>	<p>HDC WSCC Network Rail Royal Sun Alliance Neighbourhood Councils</p>

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Horsham Town Centre Vision

Horsham District Council

NOTE: PROPOSED AMENDMENTS ARE COLOURED RED FOR EASE OF REFERENCE

2017



Horsham
District
Council

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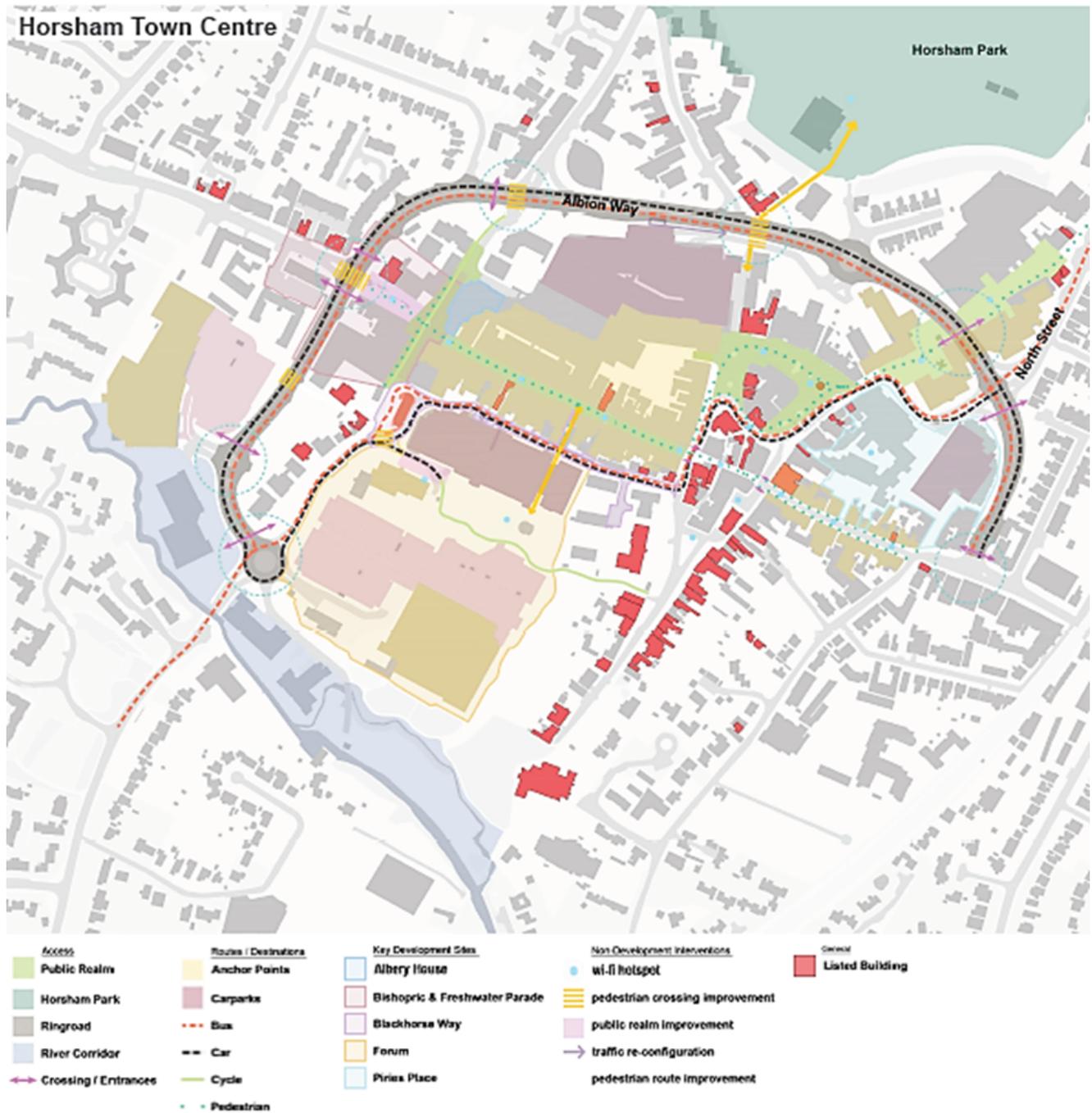
For and on behalf of GVA Grimley Limited

ACKNOWLEDGEMENTS

Horsham District Council would like to thank those members of the public who responded with comments and ideas as well as the following organisations, in response to the consultation exercise and exhibition held in May and June 2017, AVIVA/Swan Walk, Denne Neighbourhood Council, Forest Neighbourhood Council and Horsham District Cycling Forum and Sainsbury's Supermarkets Ltd.

1. Introduction

- 1.1 GVA has been appointed to prepare a Town Centre Vision Statement for Horsham Town Centre. The objective is to establish an aspirational, comprehensive and deliverable medium term vision (10-15 years) for Horsham Town Centre. This will be used by the Council, and others, to seek to ensure proposals reflect this Vision. It should be noted that the Council cannot require landowners to bring forward particular development proposals, but it can guide and inform them.
- 1.2 This report seeks to achieve this by undertaking a thorough review of the context of Horsham, including demographic, broad population characteristics, retail, residential, office and hotel market factors, and an analysis of the town centre's current weaknesses and opportunities. This is then developed into an analysis of broad opportunity areas within the town centre, followed by specific potential development sites. The potential for, scale and type of development at each site is described, and the report then assesses potential steps to delivery of these schemes and routes to improve the likelihood that other proposals could be deliverable in the future.
- 1.3 Horsham District Council (the "Council") has already identified a number of potential opportunity sites for investigation, including:
- Piries Place and East Street Service Yard (Retail units and car park);
 - Sainsbury's, adjacent car park and Forum area including the Library and Doctors' Surgery;
 - Albery House, Springfield Road (Trend and Wilkinson's end of Swan Walk);
 - Bus station and Black Horse Way;
 - Bishopric/Freshwater Parade; and
 - Springfield Road.
- 1.4 This report will examine the potential of these sites, as well as identify other potential development opportunities in the town centre identified over the course of the visioning work. Since work began on this visioning document, planning permission has been granted for several of the sites and these proposals are considered within this report.



1.5 For the purposes of this report the Town Centre is the area bounded by Albion Way, Parkway, East Street, Queen Street, Denne Road, the River Arun and Freshwater Parade/Bishopric.

2. Baseline Review

2.1 This section gathers key information on the existing planning framework, demographic and socio-economic conditions that provide context for the remainder of the report. It seeks to establish the nature of the existing town and its population, as well as to identify key drivers to understand how the town centre needs to evolve.

Planning Policy Context

2.2 The key local planning and supporting documents relevant to the town centre are as follows:

- Horsham District Planning Framework ("HDPF") (2015);
- HDPF Policies Map (2015);
- Site Specific Allocations of Land (SSAL, 2007);
- Horsham Town Plan SPD (2012);
- Horsham Town Design Statement SPD (2008) and
- Town Framework Report (2011) commissioned by the Council and prepared by Urban Practitioners.

2.3 There are a number of key planning policies contained in the HDPF of particular relevance to the town centre:

- Policy 5: Horsham Town: seeks to maintain and strengthen Horsham's role as primary economic and cultural centre in the District. Development will be permitted where it:
 - Retains Horsham's position as the main settlement;
 - Contributes to arts, heritage and leisure & other services;
 - Contributes to the economy to support vibrant high street and town centre that meets local and regional needs;
 - Delivers high quality town centre residential;
 - Retains or enhances green spaces;
- Policy 11: Tourism & Cultural Facilities: supports provision of major tourism and cultural facilities in Horsham town centre;

- Policy 12: Vitality and Viability of Existing Retail Centres: recognises Horsham as the primary town centre. Seeks to improve Horsham town centre to maintain this position, and encourages diversity of uses;
- Policy 13: Town Centre Uses: provides a "Town Centres First" strategy;
- Policy SD1: Land North of Horsham: the area north of the A264, between Langhurstwood Road and Wimlands Road, is allocated for mixed use strategic development to accommodate at least 2,500 homes and associated infrastructure. Development will be programmed in order to enable its completion by 2031. Uses include:
 - Mix of residential types and tenures;
 - A business park (46,450 sqm);
 - Local Centre (including shops (6,000sqm), healthcare and community infrastructure); and
 - Two primary schools and a secondary school.

2.4 The aim of the Horsham Town Plan is to act as the Council's starting point for more detailed discussions and proposals regarding development opportunities that arise in the town over future years and help steer potential developers as to the overall aims, aspirations and priorities the Council has for the future of the town. The key guidance of relevance to the Town Centre Vision is set out below:

- Retail Guidance:
 - Increase mix of large and small retail units;
 - New retail uses to be concentrated in the key redevelopment opportunity areas: The Forum, Swan Walk and the Bishopric and Albion Way area;
 - Refurbishment rather than redevelopment is more appropriate outside these areas;
- Commercial Guidance:
 - Future commercial development, B1, B2 and small scale B8 uses, should be focused on the Hurst Road and Nightingale Road area;
 - Council will consider the loss of office floor space in the town centre subject to conditions. It should be noted that permitted development rights have enabled conversion of office floorspace outside of the control of the planning system;
- Leisure & Cultural Guidance:

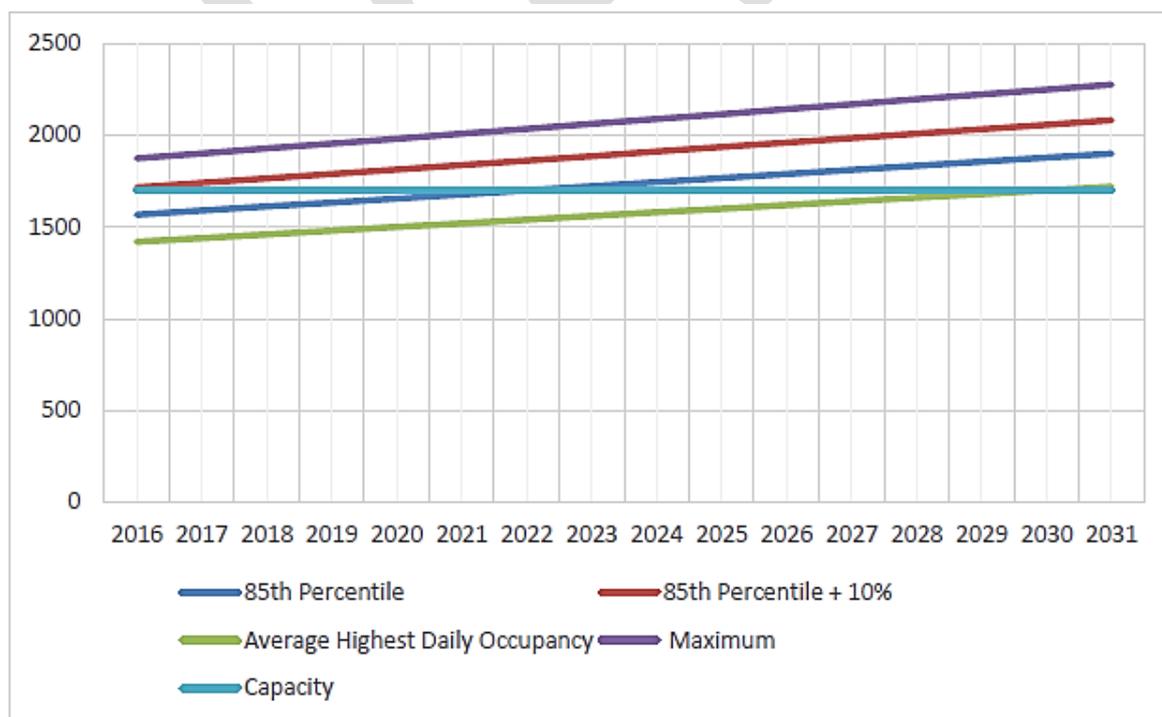
- Development of leisure and cultural facilities in the town encouraged including one or possibly two hotels in the town centre or along Hurst Road;
- Proposals that enhance the restaurant offer and night time economy are encouraged and should be concentrated on, but not limited to, the 'Quarter'; and
- Parking Guidance:
 - Parking should be concentrated in a few key locations and should contribute to a positive experience of the town centre.

2.5 Planning policies, both existing and emerging, are based on a number of evidence-base documents which include a number of headline quantitative targets or capacities which planning policies should seek to allocate for. These are summarised below:

- Housing:
 - Target of 800 homes per year which amounts to 16,000 homes over the HDPF plan period, 2011 and 2031;
 - Includes the following strategic sites:
 - At least 2,500 homes at Land North of Horsham;
 - Around 600 homes at Land West of Southwater;
 - Around 150 homes at Land South of Billingshurst;
- Retail:
 - Horsham Town Retail & Leisure Study 2016 identifies capacity across the district for c 7,000 sqm net additional convenience goods floorspace by 2021 and c 7,600 sqm net by 2026;
 - Capacity for c 4,100 sqm of comparison floorspace by 2021 and c 10,700 sqm net by 2026;
 - It is estimated in the study that c 3,000 sqm net of convenience and c 3,000 sqm net of comparison floorspace could be directed to Land North of Horsham. This would leave c 4,556 sqm net convenience and c 7,691 sqm net comparison floorspace for Horsham Town Centre, or other centres, by 2026;
- Employment:
 - The Strategic Housing and Employment Land Availability Assessment (SHELAA) (Nov 15) identifies just under c 61 hectares of land available for B class uses;
 - Additional c 28 hectares of economic land could be delivered within 6-10 years;

- The Economic Growth Assessment (EGA 2015) identifies office floorspace requirement of between 67,000sqm and 123,080 sqm; and
- Leisure:
 - Hotel and Visitor Accommodation Study (2016) identifies potential for 1 or 2 hotels in the Town Centre, to include both a mid-range and 'boutique' hotel offer.
- Future Parking Demand:
 - Horsham Town Centre Car Parking Review (2016) assesses current car parking capacity and future demand given the HDPF housing target requirements. The review concludes that Horsham will require additional parking capacity to meet projected demand by 2023 and as soon as 2018 if a 10% allowance is made for additional parking circulation space.¹
 - During some months, the Forum car park currently reaches capacity and drivers will be searching for alternative spaces in either Swan Walk or Piries Place. A car park management plan should be considered to provide visitors and employees to the town centre with the necessary information to plan their journey by either different travel means, choose a car park and minimise congestion in the town centre.

Table 1: Future Parking Demand



¹ The Institution of Highways & Transportation – advises that parking pricing should be set such that 10-15% of spaces are free at any one time to allow drivers to find a space.

The Town Centre Catchment

- 2.6 It is important to establish the context of who is currently shopping, living and working in Horsham. It is necessary to consider the current population alongside key population trends and other strategic drivers, in order to understand how the catchment is likely to change in the medium term, and how this may impact the town centre.
- 2.7 According to PROMIS the total population within the Horsham primary catchment area is 136,000. This is defined on the basis of the market share of the town and includes all postal sectors where the proportion of people who use the town as their main non-food shopping destination exceeds 15%. The estimated shopping population of Horsham is 93,000.
- 2.8 Horsham has an ageing population; there is a high proportion of older working age adults (aged 45-64) and the retired (aged 65 and over), and a lower proportion of young adults aged 15-24 and adults aged 25-44.

Table 2: Population Profile for Horsham & Comparator Areas (2010 - 2016)

Population by Age	Horsham		Horsham		West Sussex		South East		Great Britain	
	Population	%	+/-2010	%	+/-2010	%	+/-2010	%	+/-2010	
Total	138,018	100%	5.5%	100.0%	5.5%	100%	5.9%	100%	5.5%	
0-14	23,522	17.0%	-0.4%	17.1%	6.0%	18.0%	7.7%	17.7%	7.6%	
15-29	20,466	14.8%	7.9%	15.2%	0.9%	17.9%	1.7%	19.1%	0.8%	
30-49	34,060	4.8%	-5.9%	25.3%	0.2%	26.3%	-0.2%	26.5%	0.5%	
50-64	29,473	21.4%	7.8%	19.8%	6.5%	18.9%	7.8%	18.6%	7.9%	
65+	30,497	22.1%	23.4%	22.5%	14.5%	18.9%	16.4%	18.1%	14.7%	

Table showing the age of Horsham district's populace and comparing the proportions within each age range against the figures across West Sussex, the South East and Great Britain. Also shown are the percentage changes since 2010 for each age range, across each of the areas

Source: ONS mid-2016 population estimates & ONS mid-2010 population estimates

- 2.9 The table above shows the change in population profile between 2010 and 2016. Over this period there was a fall of 5.9% in the numbers of residents aged between 30 and 49. This reflects the migration figures that suggest fewer young families have moved to the district in this period than previously.

Figure 1: Open Area Classification Map – Regional



2.10 The map above is an Open Area Classification map which is based on three-tiered hierarchical geo-demographic classification of the UK built using only 2011 UK Census data at the Output Area / Small Area level. It consists of 8 Supergroups, 26 Groups and 76 Subgroups. It is a useful tool to identify broad population characteristics for an area.

2.11 The map shows the difference in the catchment of Horsham compared to neighbouring Crawley and Guildford to the north-west. Worthing appears to be more similar in character to Horsham, as it is also largely populated by 'Suburbanites'.

- Suburbanites are defined as more likely to:
- be located on the outskirts of urban areas;
- own their own home and to live in semi-detached or detached properties;
- be a mixture of those above retirement age and middle-aged parents with school age children;
- be married or in civil-partnerships is above the national average. have higher-level qualifications than the national average, with the levels of unemployment in these areas being below the national average;
- be from a white ethnic group;
- work in the information and communication, financial, public administration, and education sectors; and
- use private transport to get to work.

2.12 By contrast, Horsham is less 'cosmopolitan' than surrounding towns such as Brighton and Guildford. Cosmopolitan populations tend to live in flats in dense urban area. They are characterised by young adults, with a higher proportion of single adults and households without children than nationally. There are also higher proportions of full-time students.

2.13 The map below is a more detailed plan of Horsham town, which suggests the population largely comprises of a mix of 'suburbanites' (defined on the previous page) and 'urbanites'.

Figure 2: Open Area Classification Map – Local



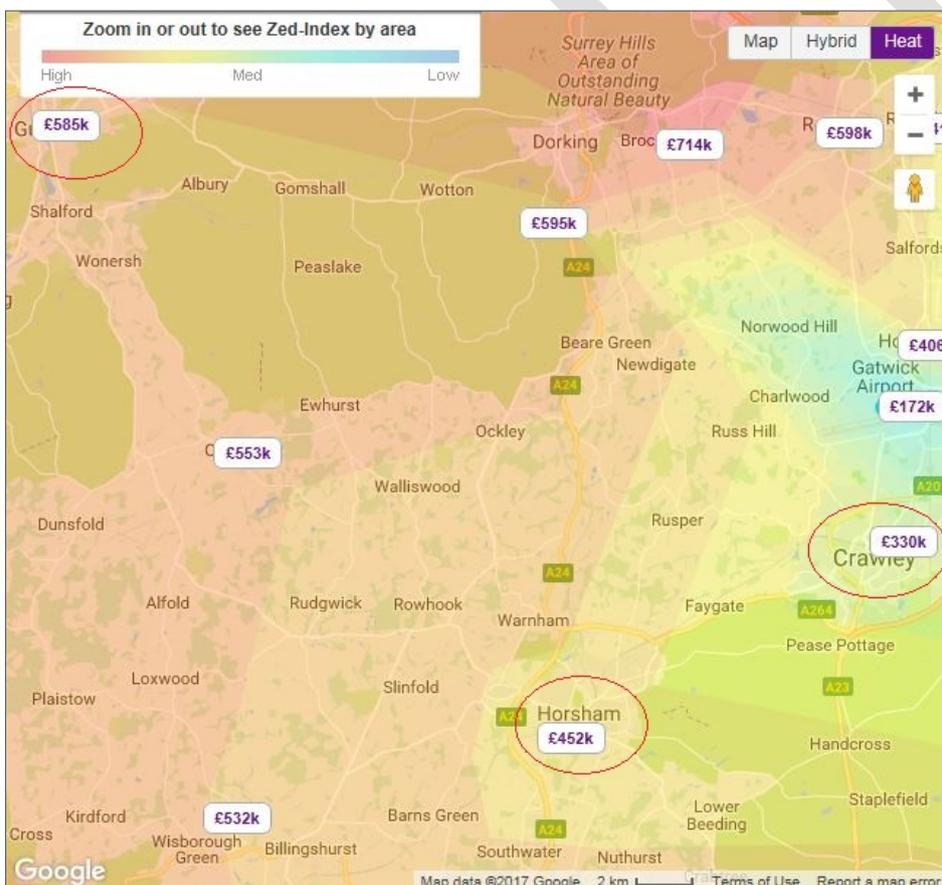
3. Market Review

3.1 This section provides an overview of the performance of key markets in Horsham Town Centre. This analysis sets the context for the vision, and has informed the development of options for identified opportunity sites.

The Residential Market

3.2 The heat map below is a property value heat map of Horsham and the surrounding area. This shows that values in Horsham are higher than neighbouring Crawley to the north east, but lower than values in Guildford to the north-west.

Figure 3: Residential Price Heat Map



3.3 Guildford has the most expensive housing stock, with the average property price achieved being c £585,000, compared to c £452,000 in Horsham.

3.4 Values in Horsham Town are broadly comparable to those of the district more widely. However, values in the town centre itself are slightly subdued compared to the rural area surrounding the town.

Figure 4: Residential Values by Property Type



3.5 Average new build schemes in Horsham are achieving between £400 - £500 per square foot (psf).

3.6 The majority of permissions granted for the town centre are for office to residential conversion; chiefly 1 and 2 bed flats.

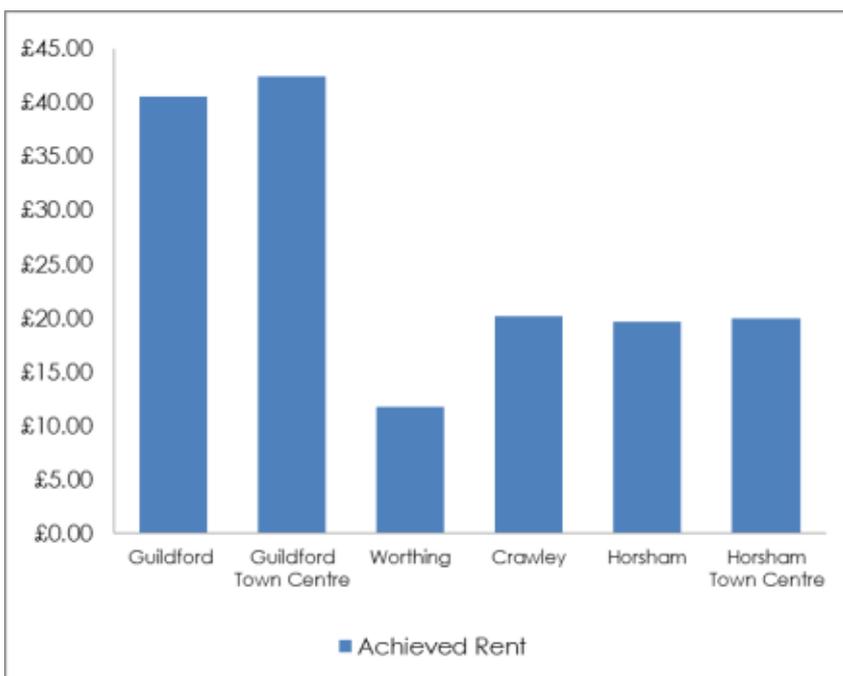
3.7 Key schemes include:

- At least 2,500 residential units and a 500,000 sq ft. business park on land north of Horsham;
- 1,000 homes south of Broadbridge Heath;
- 1,000 homes west of Horsham; and
- 2,500 homes at Kilnwood Vale.
- Over 500 residential units in the town centre achieved through permitted development of office buildings

The Retail Market

- 3.8 As a general trend, the decline of British High Streets is reported to be “getting faster.” Price Waterhouse Coopers (PwC) reports that due to the growth of e-commerce and changes in consumer habits, shops that are able to be replicated online have struggled. Other issues include the rise of homogeneity within and between centres, changing consumer expectations and a preference for providing a combination of retail and leisure, and more ‘mega’ supermarkets with a large non-food offer moving towards smaller format ‘convenience’ supermarkets in town centres.
- 3.9 Horsham's catchment is 93,000 which is considered to be average for its size and retail offer with an expectation of population growth over the period of 2015-20. Horsham's primary catchment population is affluent, with the age profile having a high proportion of 45-64 and over the retired age of 65.
- 3.10 Horsham has been identified as having a small, strong local economy, which is thriving. In terms of retail catchment, it is considered to be small centre.
- 3.11 Horsham is historically a market town, and the majority of the town centre is within a conservation area. The result of this is that much of the existing retail stock is either listed, or has small floor plates, which may not necessarily be attractive to typical occupiers.
- 3.12 In recent years demand for B1 uses has fallen which has had a knock-on effect on passing trade, with fewer town centre midweek daytime visitors to town centres. The proximity to Guildford, Crawley and Worthing means that Horsham has to continue to attract further investment to remain competitive. John Lewis at Home and a Waitrose supermarket have opened on the fringe of the town centre, which could be used as leverage for further investment, and to improve the footfall to the town centre.
- 3.13 The majority of retail provision in Horsham District is located in the town centre. Prime rents in Horsham are £85 psf for Zone A. This represents no change from mid-2015 levels, and is 19% below the pre-recession level at £105 psf for Zone A (Costar 2016). The chart below illustrates average 'achieved rents' with Guildford significantly higher than Horsham or Crawley.

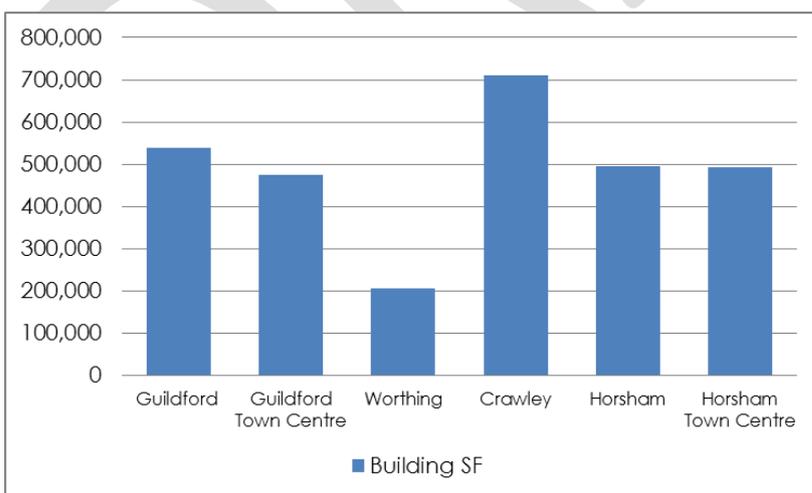
Figure 5: Achieved Retail Rents (£psf)



Source: Costar 2016

3.14 Horsham Town Centre contains just less than 500,000 sq ft. of retail floorspace. This is comparable to that of Guildford, and significantly less than in Crawley. There are no projects in the development pipeline to increase retail provision in Horsham; however investment in existing provision at Swan Walk and Piries Place is planned.

Figure 6: Total Retail Floorspace, in Square Foot



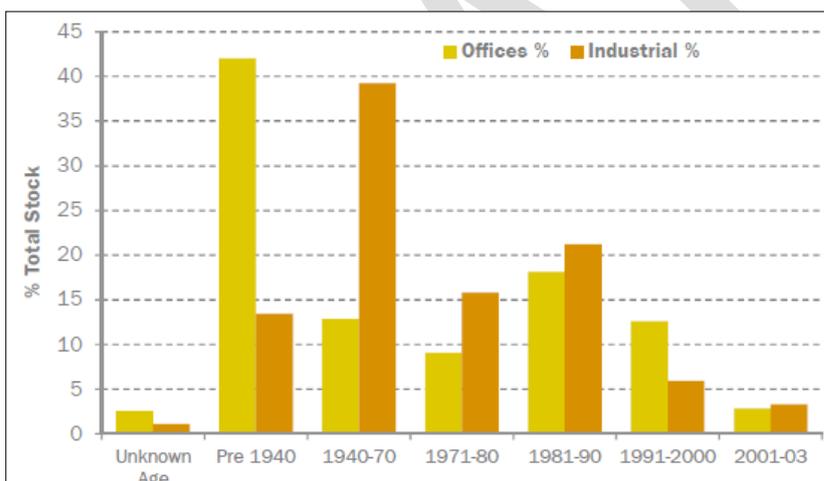
Source: Costar 2016

3.15 It should be noted that the above floorspace figures reflect total retail floorspace listed within the CoStar database, a leading industry agency platform. This includes all retail floorspace within a town centre area and is not limited just to core or 'prime' space.

The Office Market

- 3.16 In common with many other Sussex towns, Horsham has seen very limited speculative development over the last 10 to 15 years. Indeed, only Brighton and Crawley have seen consistent development of new commercial buildings. Crawley is a competing centre, which historically has attracted larger corporate and international companies.
- 3.17 In recent years, Horsham Town centre has seen a decline in demand for office space. This could be attributed to a number of reasons, including inflexible and unsuitable floorplates, lack of grade A space, and older stock being no longer fit purpose. There has been no recent office developments as current rental levels in Horsham are below the level required to make new office development viable. In addition to this, Horsham also forms part of the Gatwick Diamond, and occupiers often seek to locate to out-of-town business parks which are easily accessible, provide better services and have more flexible floorplates.

Figure 7: Office Stock Age Profile



Source: Nathaniel Lichfield

- 3.18 Horsham has a higher proportion of small firms, 1 -9 employees (90.2%), than the regional (89.5%) and UK (88.7%) averages. Therefore, it is evident that smaller floorplates would be suitable for Horsham town centre. Yet, due partly to the rural nature of much of the District, many of Horsham's businesses (particularly SMEs) are home based. However, with the recorded rates of start-up enterprises increasing year-on-year, there is potential to provide suitable flexible office space and workshops for these businesses in the town centre.
- 3.19 Values for office floorspace in Horsham are lower than in competing centres, such Crawley and Guildford. Whilst this may make the town centre attractive to certain occupiers seeking more affordable space, it is likely to reflect the quality of the office stock in Horsham.

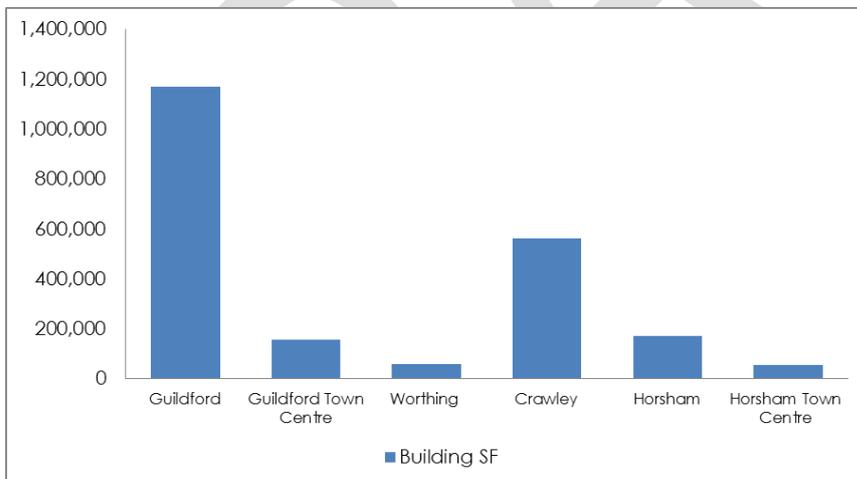
Figure 8: Achieved Office Rents (£psf)



Source: Costar

3.20 Relative to other centres, Horsham has very little office space provision in its centre. Guildford has a number of business parks in the borough, which accounts for much of its office space stock.

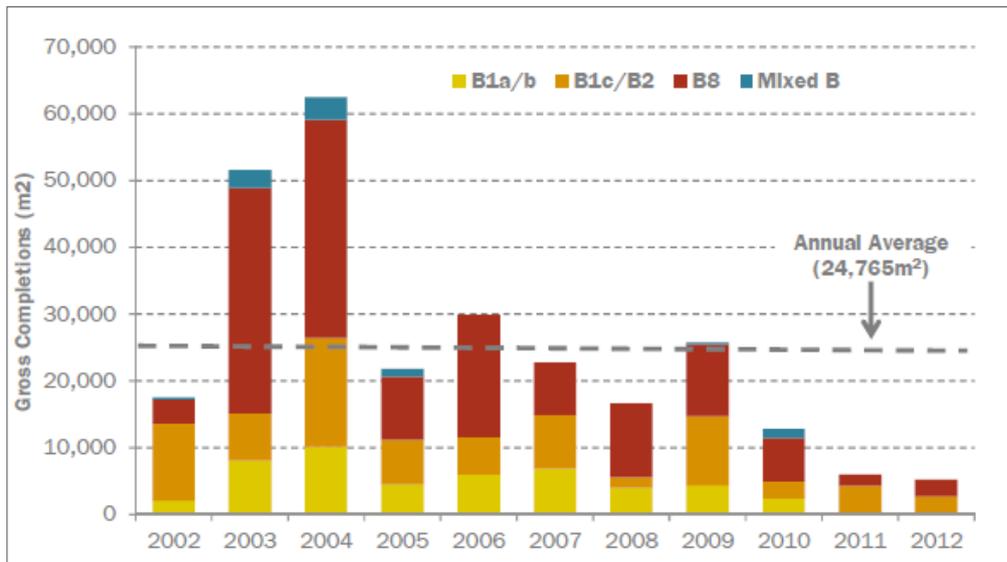
Figure 9: Total Office Floorspace, in Square Foot



Source: Costar

3.21 Whilst there is demand for office floorspace in Horsham, the lack of Grade A stock deters companies relocating to Horsham. Agents comment that they are already beginning to see evidence of occupiers not being able to find the quality of accommodation they would like in the Horsham area, and this will be compounded with the pressure on supply from permitted development for conversion of offices to residential use, and the lack of speculative development.

Figure 10: Office Floorspace Completions



Source: BIS

The Hotel Market

- 3.22 The HDPF notes that whilst tourism plays a significant role in the local economy, there is a shortage of suitable accommodation. As a result the majority of visitors only stay for the day. **The 2016 District Hotel and Visitor Accommodation study identifies a current shortage of hotel accommodation for local companies, future corporate demand, domestic short breaks and weekend away market, wedding, family and friends accommodation associated with existing and future housing and population growth.**

3.23 In Horsham there is the following supply of hotels:

- Travelodge – 67 Rooms; and
- Premier Inn – 64 rooms.

3.24 The Hotel and Visitor Accommodation Study (2016) identifies demand for a 3* or 4* hotel and a boutique hotel (characterful building).

Regional Hotel Values

3.25 The Premier Inn Gatwick, 204 bedrooms, sold as an investment in Feb 2014 for £26.5m (£129,901 per bedroom). The rent passing was £4,638 per bedroom and the yield was 4.68%.

3.26 These values are slightly high for Horsham, but are an indication of hotel values for the area.

3.27 The rent on the Travelodge Gatwick was £4,060 per bedroom per annum.

3.28 Some comparable deals are shown below:

Figure 11: Comparable Hotels Transactions

Year	Hotel	Bedrooms	Price (£m)	Price / Bedroom	Comments
11 2015	Jurys Inn Brighton	234	£28.23	121,561	Acquired by Charities Property Fund, NIY 5.25%
09 2015	Premier Inn Reading Central	151	£13.5	89,404	
06 2015	Premier Inn Woking	105	£11.75	111,905	Pickering Developments
12 2014	Holiday Inn Express, Croydon	156	Off guide £13.0	83,333	
02 2014	Premier Inn Gatwick	204	£26.5	£129,901	Rent passing £4,638 / bedroom, NIY 4.68%

3.29 These values would appear to be supportive of new hotel development in Horsham, even if it is likely to be a less attractive location to some occupiers than those mentioned above. The sector is experiencing relatively low yields, and this combined with the potential undersupply of bedrooms in Horsham identified by the Hotel and Visitor Accommodation Study (2016) should mean that hotels are a competitive land use in value terms.

4. SWOT Analysis

4.1 This section provides a summary of the strengths, weaknesses, threats and opportunities for Horsham Town Centre identified through the baseline analysis and through discussion with Council officers, local stakeholder consultation and site visits.

Strengths

Retail

- Horsham Town is a strongly performing retail centre – it was ranked second on a list of 'Premium Retail Opportunities' in 2015;
- The Horsham Town Centre Retail and Leisure Study (2017) identifies that Horsham is a strong centre with a low vacancy rate and a good mix of occupiers. Surveys confirmed that retail businesses are positive about the town centre and their on-going role there;
- Horsham is an attractive town with a historic environment, which makes it well-placed to capitalise on increasing demand for 'experience based' leisure and shopping activities. It offers an alternative to more sterile shopping centre environments;
- The BIS Research Paper 188 Policy Implications of Recent Trends in the High-Street/Retail Sector (2014) defined Horsham as a Type 4 Centre: 'Small-medium, strong socio-economic context, thriving' along with Lewes and Hebdon Bridge; and
- The Research Paper also recognised the strength of its comparison retail offer, particularly the mix of high end retailers and independent shops as key to differentiating Horsham from its neighbours. The events calendar and historic environment are key assets which are valued highly and are important to the town's success.
- **Swan Walk is a key town centre retail asset given its strategic location, size and varied retail offer with overall footfall generated benefitting the wider town centre shopping experience.**

Residential Catchment

- Horsham has an affluent catchment, ranked the 4th most affluent centre in the UK by Promis;
- It was ranked as second most attractive market town to live in UK in Times list of top market towns in 2015;
- The Town benefits from an active and engaged local community; and

- New development on edge of Town will deliver around 5,000 new homes. This will expand the town centre catchment population, therefore increasing spending power. The developments will also diversify the demographic mix through provision of a mix of housing types and tenures.

Commercial Activity

- Part of the South East economy and influenced by London – together representing a global economic hub;
- International connections through Gatwick Airport;
- Relatively high proportion of small businesses and above average new business formation rates; and
- Located in the 'Creative Corridor' between London and Brighton - opportunity to attract more creative occupiers to Horsham town through investment in infrastructure (Broadband) and more flexible workspaces.

Weaknesses

Retail

- Strong retail mix, further strengthened by John Lewis at Home, however comments from local community suggests more could be done to balance out high-end retail to meet demand of the whole catchment. This is further confirmed in the Horsham Town Centre Retail and Leisure Study (2017) survey data;
- Household surveys carried out as part of the Horsham Town Centre Retail and Leisure Study (2017) were generally positive, though respondents did identify that cinema and clothing shop provision in particular could be improved;
- Bishopric and Piries Place are identified by the Study as weaker environments in need of investment;
- Retail units tend to be small due to the historic setting of the town centre therefore some occupiers are trading from under-sized units; and
- Permission has been given for the redevelopment of Piries Place, to include a hotel, Everyman cinema, and cafes and restaurants. Whilst this development will significantly increase the evening economy, the significance of this area for retail will be reduced.

Office

- The office stock in Horsham Town Centre is dominated by 1980s buildings, some of which are no longer fit for purpose given their size and layout – Horsham scored poorly in Economic Growth Assessment in terms of business accommodation and supporting infrastructure.

Housing

- House prices are high making the town unaffordable for local young families and lower earners.

Catchment

- Horsham's catchment is affluent but ageing, which may impact on the future spending profile of the population, economic activity levels and the type of retail offer.

Public Realm

- Mix of paving and detailing throughout town centre – could benefit from more a holistic and co-ordinated public realm approach;
- Some areas of public realm could benefit from investment and uplift e.g. Bishopric and Queens Street; and
- Some pedestrian routes e.g. between the Forum and West Street are challenging at present – there is potential to improve legibility.

Town Centre Management

- Issues with bin storage in some parts of town centre, notably Blackhorse Way – need for more co-ordinated approach to waste management; and
- There is a lack of commercial sponsorship for a Business Improvement District.

Town Centre Gateways

- Gateways into town centre e.g. routes from the station, as well as from the John Lewis store to western end of West Street currently lack legibility and visual connection with the core town centre.

Opportunities

Retail

- Recent and on-going investment in Swan Walk, with schemes for remodelled A1 units, as well as hotel, café, restaurant and cinema uses, could attract new occupiers to town;
- The Horsham Town Centre Retail and Leisure Study (2017) identified considerable additional retail floorspace need. The Study identifies 7,500sqm net convenience need and 10,700sqm net of comparison need by 2026, though this makes no allowance for continuing overtrading of existing stores. Around 6,000sqm net of this could be directed to the new community north of Horsham. However, clearly there is significant opportunity for additional floorspace to be delivered to expand the town centre offer without damaging existing trade;
- Opportunity to further invest in events and 'pop-ups' to activate town centre; and
- Town Centres are increasingly diversifying offer to meet growing demand for leisure activities. Horsham benefits from attractive environment, therefore opportunity to further consolidate role through investment in leisure, cultural and civic offer alongside retail.

Office

- Wider shift in the economy towards office based activity, though offers are evolving to include less traditional workplace environments e.g. start-up/collaborative space in the rural/urban fringe;
- Horsham has high rates of home-working at 10.5% compared to an average of 8.3% across the South East;
- Opportunity to invest in provision of higher quality, flexible workspace hubs to meet demand from Small and Medium sized Enterprises (SMEs) in Horsham;
- Horsham also sits within 'Gatwick Diamond'; and
- HDPF target to provide 5,000 new jobs, 3,300 new homes, and 78,500 square metres of additional employment space.

Catchment

- Provision of new residential units in town centre can enliven central area, and provide boost to evening economy and 'top-up' shopping;
- The Horsham Town Centre Retail and Leisure Study (2017) confirms that as offices are converted to residential uses in the town centre under permitted development rights, this

can have a positive effect on town centre retail by expanding the catchment, particularly as residents are right in the town centre, and enhancing 'community spirit'. This particularly includes reducing crime in town centres and extending the night time economy; and

- New communities to north and west of Horsham will broaden demographic of catchment – likely to increase the number of families in the area. This will increase footfall in town centre and presents opportunity to diversify offer.

Tourism

- Evidence from Historic England research suggest visits to historic places accounted for 69 million day visits in England in 2012; and visits to historic environments have grown 10% between 2001 and 2011;
- Cycling tourism also growing – over the last 5 years bike sales have increased by 14% ; and the industry worth £745mn in 2013 (up from £639m in 2008);
- Cycling tourists tend to have above average incomes, stay in independent accommodation and eat locally;
- Opportunity to make Horsham more cycle friendly by investing in 'green routes' into the town centre, providing 'bike friendly accommodation, infrastructure and developing a Walking and Cycling Strategy; and
- Opportunity for more comprehensive and co-ordinated approach to tourism and branding that emphasises Horsham's strategic location as gateway to the South Downs National Park and the High Weald Landscape Trail, and attractive base to explore area from.

Threats

Retail

- Growth of competing centres and 'mega-centres', particularly the proposed Westfield development at Croydon – need to ensure Horsham remains competitive by differentiating offer;
- The Horsham Town Centre Retail and Leisure Study (2017) identifies Brighton, Guildford and Worthing as key competing centres which draw trade from Horsham's catchment;
- Diversity of retail offer – given the popularity of Horsham as a location for high end retail, there is a risk that low earners may feel excluded by offer;

- The continuing rise of e-commerce: may take trade from traditional retailers, though there may be opportunities presented by click and collect (Horsham Town Centre Retail and Leisure Study (2017));
- Out of town retail will continue to offer stiff competition to town centres, to be mitigated by promoting retailer mix and allocating sites for the development of modern units. The 'experience' offered by the high street is its key point of difference (Horsham Town Centre Retail and Leisure Study (2017)); and
- Loss of key anchors could impact on strength of Horsham as a destination.

Commercial

- Decline of office based employment in town – threat of RSA relocation;
- Oversupply of 1980s office buildings as large occupiers scale back presence - need for new high quality space;
- Competition from out of town business parks at North Horsham and the former Novartis site;
- Loss of office market could impact on day-time footfall in town centre; and
- Although Heathrow has been chosen as the recommended airport for further expansion any alternative decision to support Gatwick could potentially impact on performance of Horsham office market, particularly if Gatwick further strengthens as location. Conversely, a decision in favour of Gatwick may afford Horsham spill-over opportunities.

Catchment

- High proportion of out-commuting to neighbouring towns – need to boost high skilled jobs in Horsham;
- Impact of ageing population on economic productivity of town;
- Impact of high cost of living on affordability of Horsham for young families and low-earners;
- Increasing pressure to house overspill population from London, as well as Brighton, which has unmet housing needs of 17,000 units, and other constrained coastal towns to the south; and
- Rapid growth in population could put pressure on existing infrastructure, particularly the transport network.

Community Infrastructure

- Risk that community could feel disconnected from change process in town centre if not fully engaged; and
- Lack of a community hub in town centre could limit role of community in driving change.

Image and Identity

- A historic market town identity within the South East provides many advantages; however perceptions may limit new investment from next generation retailers and businesses and its appeal to young and affluent households and consumers.

DRAFT

5. Strategic Town Centre Review

5.1 This section examines more closely the nature of Horsham town centre in terms of its use, characteristics and form. It then builds on both this examination and the SWOT analysis (see previous section) to identify strategic directions for the town centre which future development should seek to realise.

Who Uses the Town Centre?



Carfax

5.2 Horsham has a relatively localised catchment. Analysis of the survey data supporting the Horsham Town Centre Retail and Leisure Study (2017) provides a broader understanding of the retail centre context and the transport links and routes that connect into the town centre can help to understand who its users are. The key groups visiting the town centre are, in general terms:

- Horsham Residents (those who are shopping and spending their leisure time in the town centre);
- Horsham Employees (those who work in Horsham town centre, and who live either in Horsham or further afield); and
- Horsham Visitors (those who are visiting the town centre from outside Horsham).

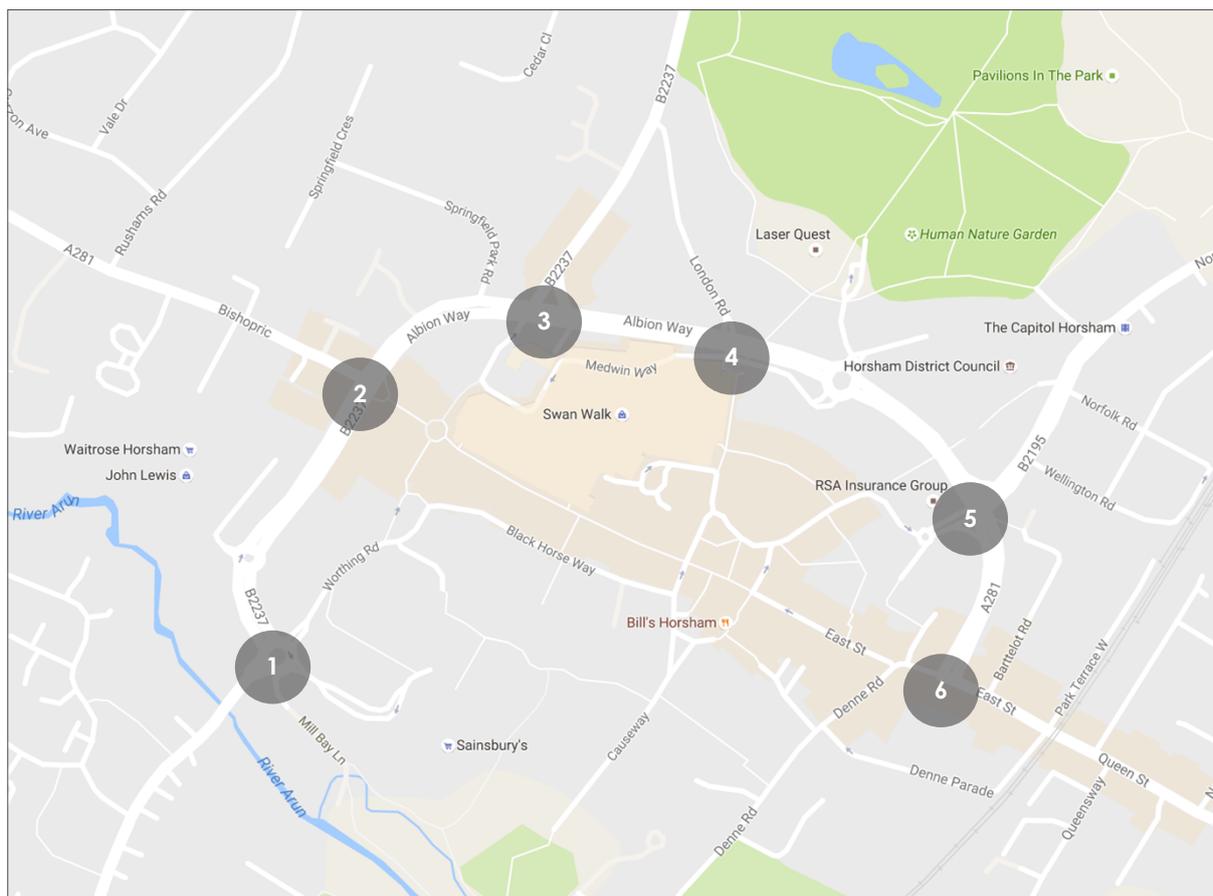
5.3 Each of these key groups is likely to use the town centre at different times, for different periods of time, and for slightly different reasons. However, a strong retail and leisure offer and good employment opportunities are the key strengths the town centre should aim to provide for these groups.

- 5.4 There is scope for Horsham town centre to improve its tourism role, and to attract visitors from further afield. Horsham's historical environment is one of its main draws and a point of differentiation from some competing centres. This attraction is well recognised. Horsham also has a number of other merits that could be improved to attract visitors to stay in the town rather than pass through it.
- 5.5 Firstly, Horsham has good connections to Gatwick, making it easily accessible for tourists, business travellers and Gatwick-related employees. Secondly, Horsham is strategically located near Areas of Outstanding Natural Beauty (AONBs) and at the start of the High Weald Landscape Trail, and could be a good gateway to the South Downs National Park and the South Coast; it is therefore an attractive base to explore the countryside. There is also potential for Horsham to accommodate cycling tourism, as the town is within reach of London and Brighton with the 'Downslink' cycle path, from Chertsey to Shoreham, passing to the west of the Town Centre through Southwater.
- 5.6 Improving the hotel provision could play a key role in rebranding the town centre to attract visitors. The Hotel Study (2016) by Hotel Solutions concluded that Horsham town centre would be able to accommodate a boutique and potentially one or two mid-range hotels which could greatly improve the town centre offer, which currently only has budget hotels and is not seen as a holiday (short break) destination.

Town Centre Gateways

- 5.7 Those who use the town centre access it through a number of key gateways. Due to the existing road infrastructure and public transport links, it is evident that access to the town centre is car-orientated, with cars being the preferred method of transportation into the town, supported by substantial car parking provision. The town centre is also accessed via public transport, which is more likely to be used by visitors to Horsham, or those working in the town centre.
- 5.8 The key town centre gateways are identified in the plan below.

Figure 12: Town Centre Gateways Plan



- 5.9 **Gateway 1** provides access to the town centre to/from the surrounding southern towns and villages, via Worthing Road, which connects to the A24. This key gateway is an important access point for those travelling by bus to the town centre, as the bus station is located on Worthing Road. There is poor visual amenity for pedestrians at Albion Way, though the route up Worthing Road is pleasant, if narrow.
- 5.10 **Gateway 2** provides access to the town centre from the western residential area of Horsham by car using the A281 which also connects to the A24. There are pedestrian crossings with traffic lights which connect Freshwater Parade and Bishopric by foot, though Albion Way remains a barrier.
- 5.11 **Gateway 3** provides access to the town centre by car for the northern / western residential areas of Horsham via the B2237, which again connects to the A24. A pedestrian crossing links Springfield Road with the B2237, though there is little to signal the start of the town centre to pedestrians.

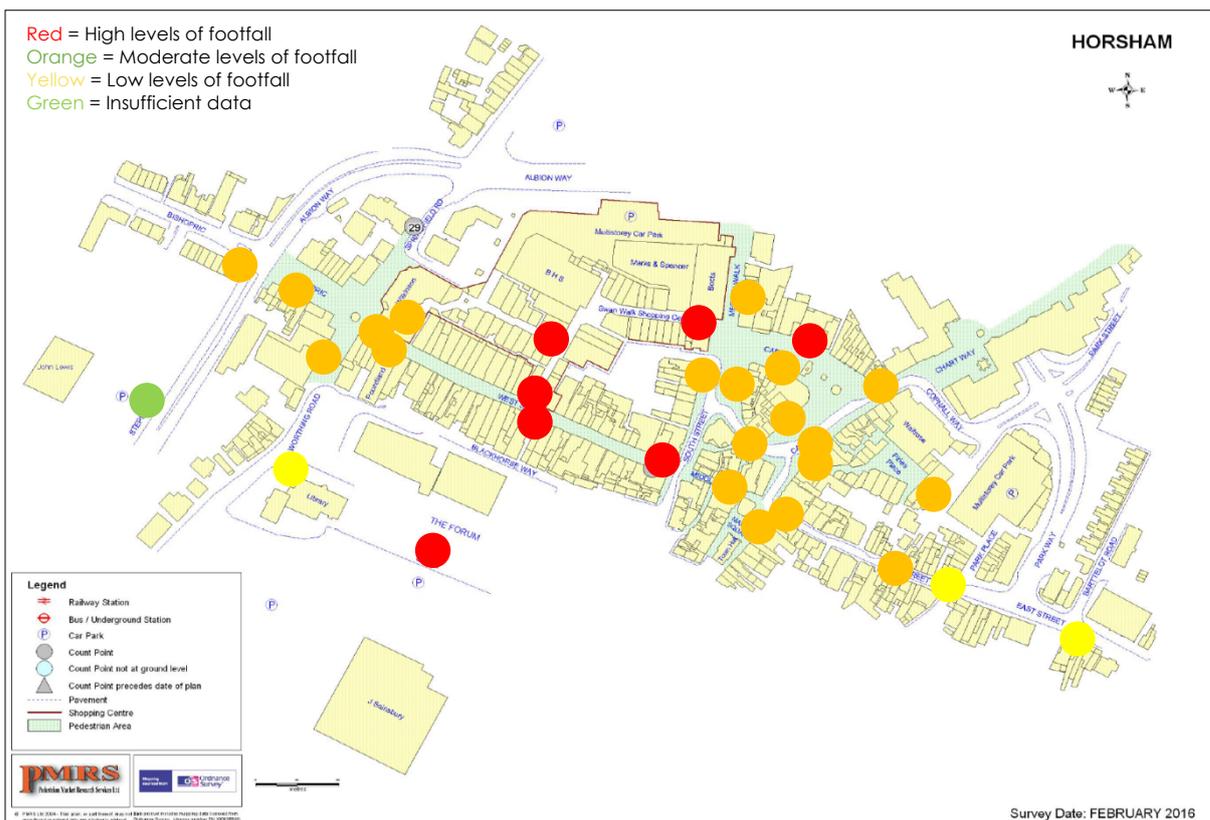
- 5.12 **Gateway 4** provides a connection for residents or visitors who are accessing the town centre from the north of the town. It is the only gateway which has a “green” route to the town centre. The public right of way across Horsham Park provides an access route for residents or visitors who are either cycling or walking from the north of Horsham town or taking a slightly longer route from the train station. The Jubilee Walk/Albion Way underpass and Medwin Way crossing, however, remains an unappealing route.
- 5.13 **Gateway 5** is the main route for those visiting Horsham via train. The B2195 (North Street) provides a straight line access route to the train station. However, the distance from the train station to the town and the lack of signage creates a poor connection visually. Additionally, the existing path along the road, although pleasant, does little to create a sense of place and animate the gateway to the town centre. Chart Way, which turns off North Street to travel past the Council offices and other office buildings, provides a pedestrian only environment directly into Carfax, but it does not provide the sense that it is a key route into the town centre.
- 5.14 **Gateway 6** provides access to the town centre via East Street, and is primarily car-orientated. This is comparably a lesser used entrance point; however it does provide access directly to the restaurant and bar cluster in East Street. Again, this entrance is not well communicated.
- 5.15 To some extent, it is these key gateways which have had a role in shaping the town centre and dictating how people currently use and move through the centre.

Key Footfall Drivers

- 5.16 Within the town centre, there are a number of locations which constitute key footfall drivers. By identifying these and tracking movement between these locations, one can accurately understand the role of the existing town centre.
- 5.17 The Survey work undertaken by Pedestrian Market Research Service's (PMRS) as part of the Horsham Town Centre Retail and Leisure Study (2017) shows that the majority of footfall for the town centre occurs around Swan Walk, West Street and The Forum. This reflects the routes to Swan Walk and the town centre's core retail offer, with West Street constituting the main retail high street.
- 5.18 The highest footfall counts were recorded at:
- Fat Face (inside Swan Walk, eastern entrance);
 - Jones Shoes (Swan Walk, West Street entrance);
 - Waterstones (Carfax);

- Pret a Manger (West Street, opposite Swan Walk entrance);
- New Look (inside Swan Walk);
- Sainsbury's car park steps (The Forum); and
- Halifax Building Society (Carfax).

Figure 13: PMRS Footfall Survey Heat Map



5.19 These locations map a strong north/south axis across the town centre linking Swan Walk shopping centre and the multi-storey car park, across West Street to the Sainsbury's store and car park. More specifically, the high footfall count at Forum Way reflects the importance of the connection from this direction to the centre's retail and leisure clusters for those who have entered the centre through Gateway's 1 and 2, and who have parked in the large Sainsbury's car park. Sainsbury's is a key footfall driver, and reflects shopping patterns whereby visitors park at Sainsbury's, visit West Street and other parts of the town centre, and then visit Sainsbury's before leaving the town centre.

5.20 The lowest footfall count point locations were recorded on the outer western and eastern periphery of the primary shopping area:

- Library (Worthing Road);

- Church (Springfield Road);
- Bath Store (East Street); and
- Norsat (East Street).

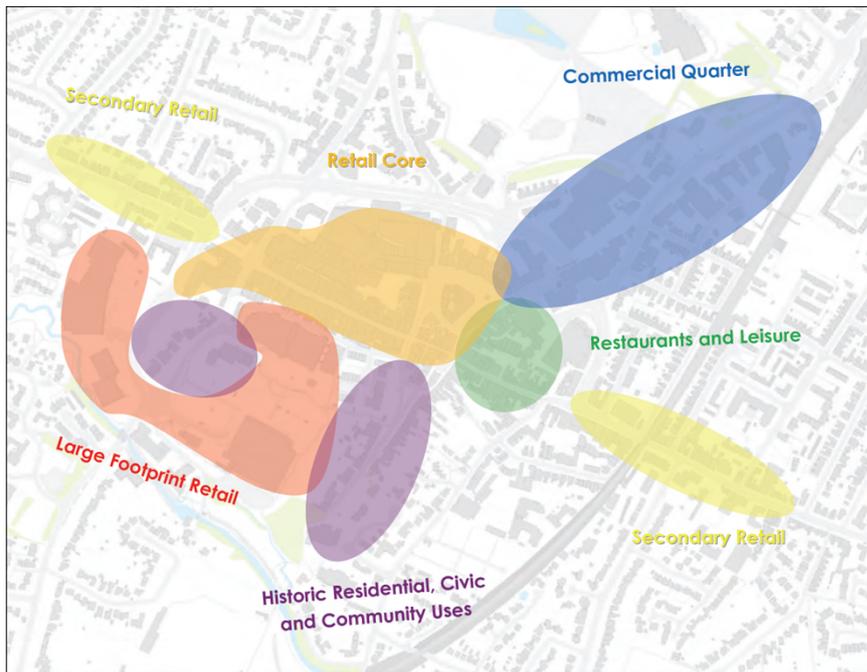
5.21 The footfall survey did not identify high levels of footfall near East Street. However, the footfall survey was undertaken during the day and does not reflect the footfall activity in the town centre at night. East Street would generate a proportionally higher footfall at night, relative to the rest of the town centre, as the restaurant offer and evening economy is predominately located here.

5.22 Although John Lewis at Home could be considered a key footfall driver, its connection to the town centre is weak, with Albion Way acting as a barrier between it and the town centre. There is no easy crossing point for pedestrians and cyclists moving between the John Lewis at Home and the rest of the town centre. There is a danger that such provision could lead to a single stop and therefore it is recommended that the Council seeks to enhance linkages between the store and the rest of the town centre.

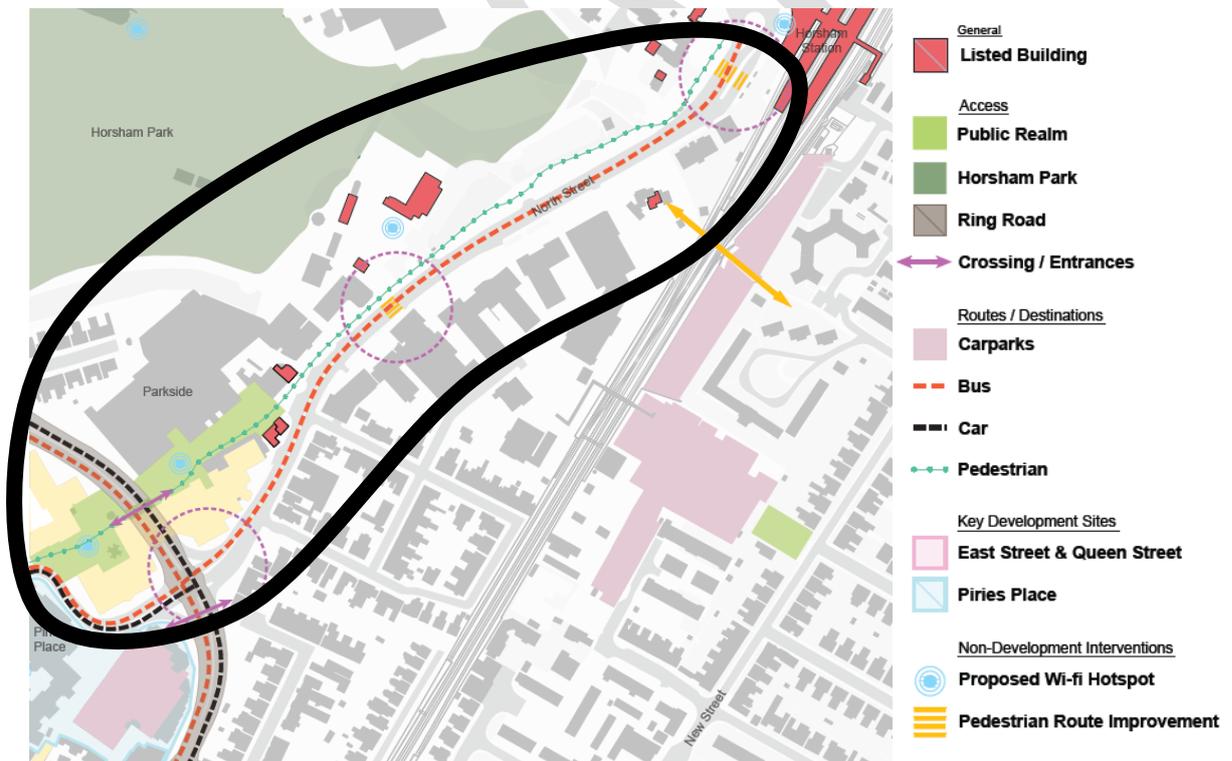
Town Centre Character Areas

5.23 The town centre can broadly be divided into six different character areas, according to the land use and building typologies in each. A Character Areas Plan illustrating the location and extent of each character area is provided below.

Figure 14: Town Centre Character Areas



Commercial Quarter



5.24 This is predominately where offices are located in Horsham town centre, such as Horsham District Council and West Sussex County Council offices, RSA Insurance Group and The Creative Assembly. The attractiveness for office activity in this location is driven by the

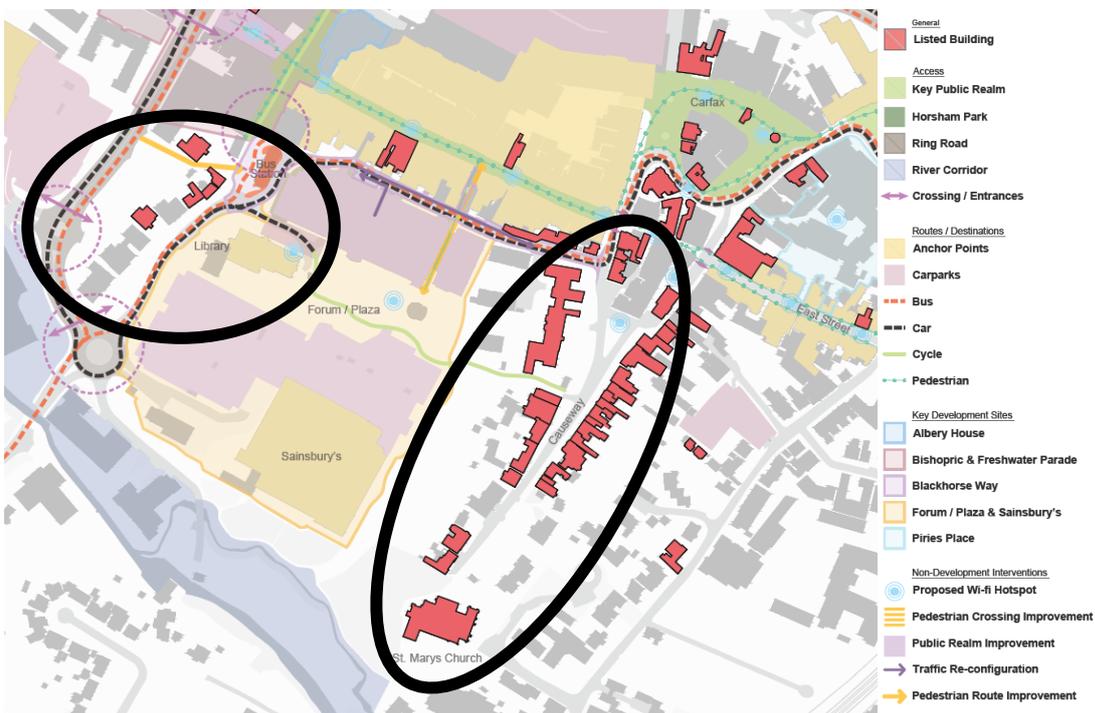
proximity and accessibility to the railway station and the food and beverage offer to the east of the town centre (Piries Place and East Street). The office cluster here also benefits from good visibility on a key gateway into the town centre.

- 5.25 Generally built in the 1970s and 80s, these are large footprint buildings with corporate occupiers, which extend away from the town centre along North Street. Linden House, like some other office buildings has been converted to residential use taking advantage of 'Permitted Development' rights.



North Street – Commercial Quarter

Historic Residential, Civic and Community Uses



5.26 The Causeway, located to the east of Sainsbury's and south of Carfax, features historic residential buildings of character, which should be referenced by new development in Horsham to preserve and define its image. Historic residential buildings are also located to the west of Worthing Road, some of which now house businesses. These streets effectively bookend the relative modernity of Sainsbury's and The Forum.

5.27 St Mary's Church is also located at the south of The Causeway, and Horsham Library and Citizen's Advice Bureau is located just to the east of Worthing Road. These areas therefore also have a civic and community function. There is also a children's play area to the east of the library.

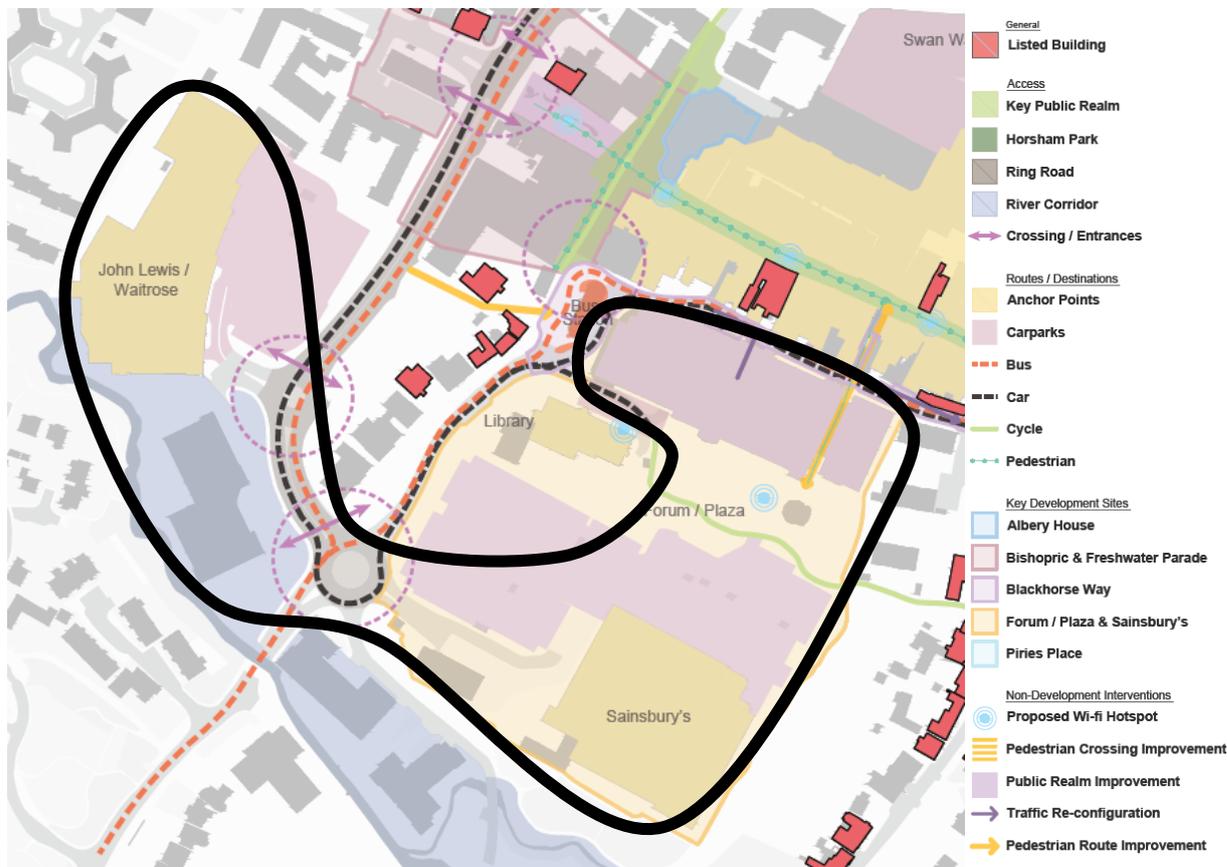


Causeway



St. Mary's Church

Large Footprint Retail



- 5.28 In contrast to the predominantly historic core shopping area, the areas to the south and southwest of the town centre feature large retail stores. This area functions much like an out-of-town or edge-of-town retail park, with large footprint retail units, and the majority of visits being by car.
- 5.29 The Sainsbury's superstore is the main convenience retail offer in the town centre, and the associated (predominantly surface) car park also services the wider town centre. This is a large format store suitable for weekly shops.

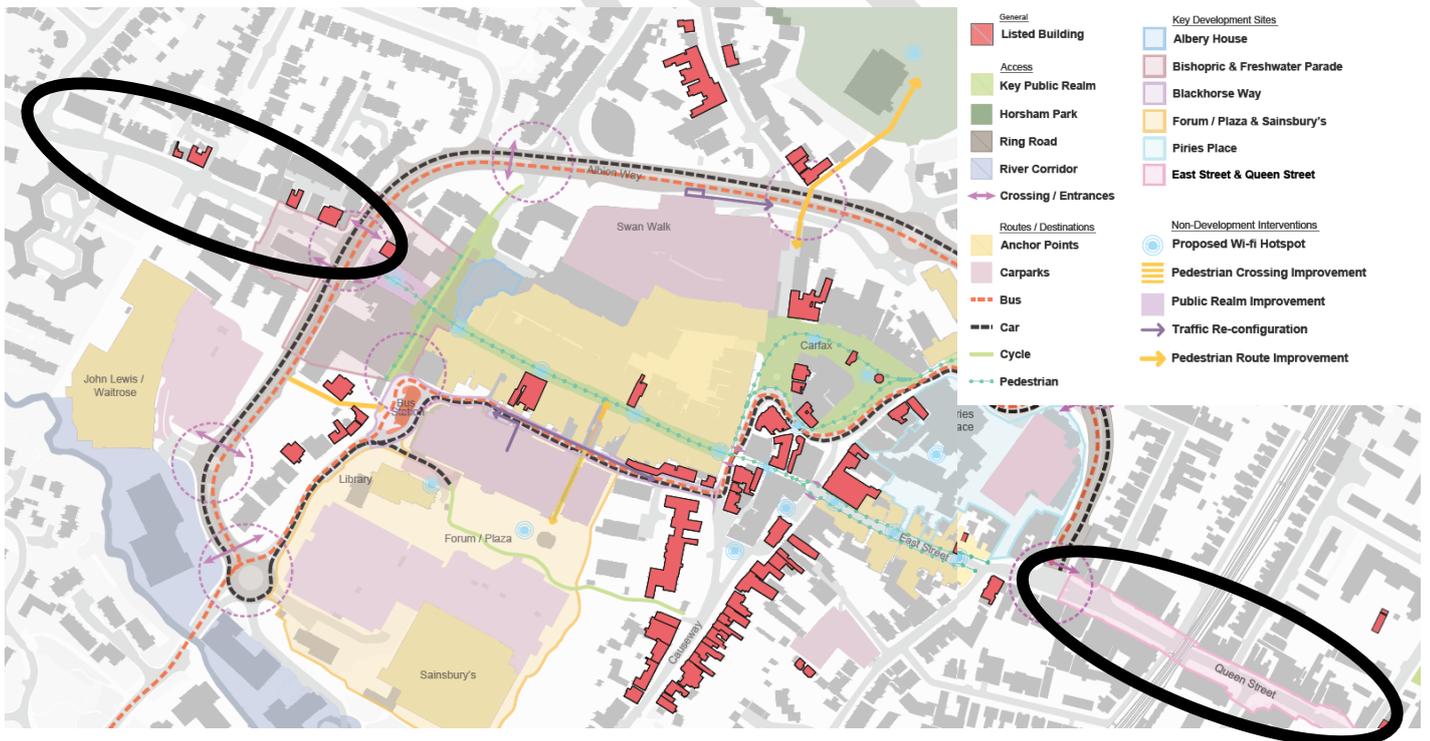
5.30 Also included in this area are Currys, Office Outlet (formerly Staples), John Lewis at Home and Waitrose stores to the east of Albion Way and Worthing Road. Whilst these areas do not necessarily link together, they are by-and-large similar formats. In addition, The Forum, located to the north of Sainsbury's, acts as something of a halfway house between the large footprint stores and the historic High Street, in that it includes mid-sized retail units which may be found equally in town centre or out-of-town settings.





Forum Piazza

Secondary Retail



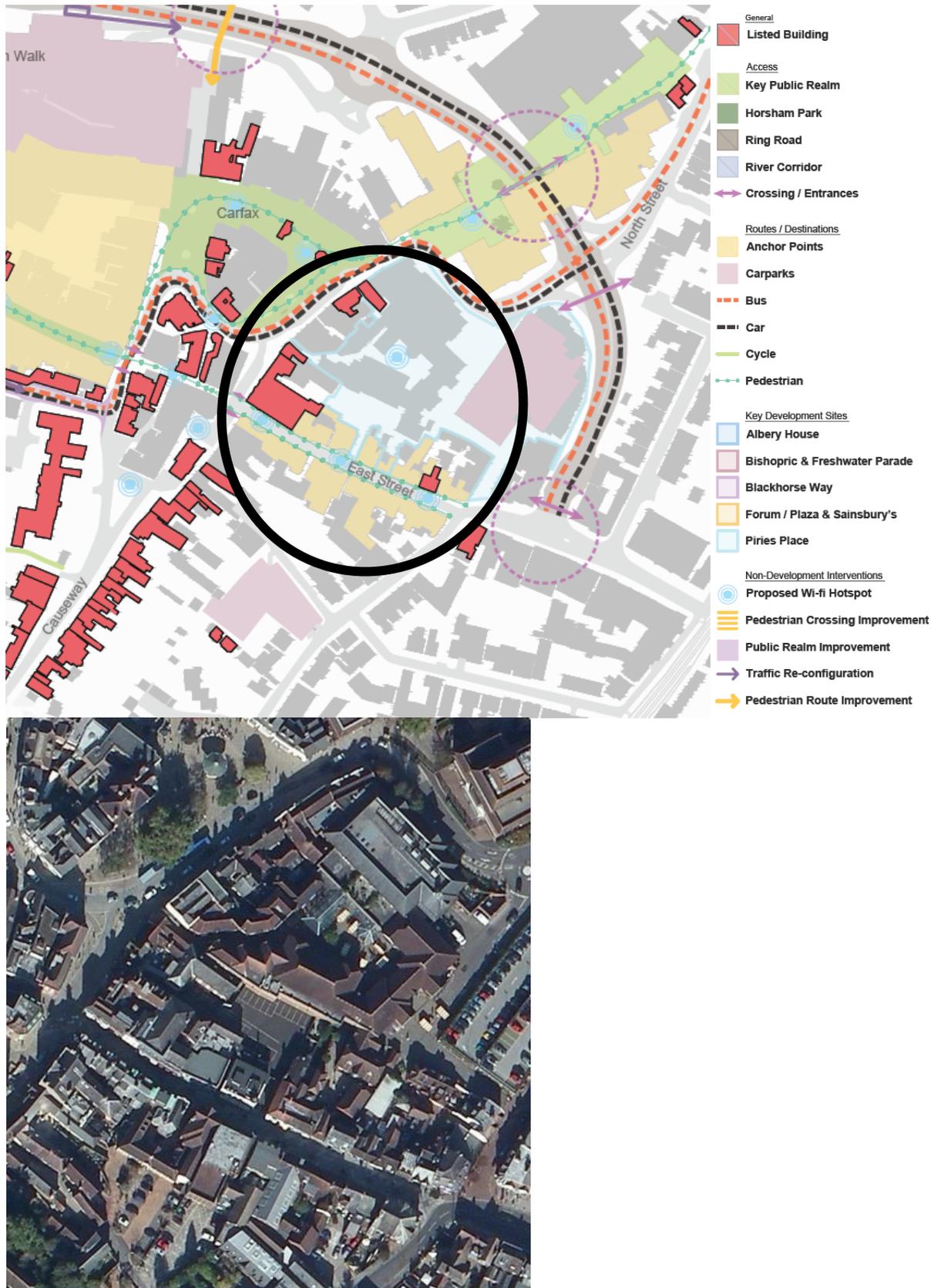


- 5.31 Bishopric at the western end of the town centre, and Queen Street and part of East Street at the east, represent the secondary retail areas of Horsham. Both contain a mix of occupiers and types of unit, but both share a propensity towards more independent occupiers, and a higher proportion of A5 (hot food takeaway) units and vacancies. There is generally a lack of visual continuity, with a diverse mix of building types, and connection to the core town centre is limited by Albion Way.



Queen Street

Restaurants and Leisure



- 5.32 East Street and Piries Place constitute the main dining district and centre for the night time economy of the town centre, with occupiers including Strada, Pizza Express, Wagamama and Côte. Many of the buildings are historic and contribute positively to the town centre streetscape, reinforced by the predominantly pedestrianised section of East Street. Attractive, historic buildings also front Carfax.
- 5.33 The predominantly restaurant and leisure focus continues into Piries Place, with a number of bars in this location. There is also a significant multi-storey car park in this location, at Piries Place; one of three main car parks serving the town centre as a whole.



East Street

Retail Core



General	Routes / Destinations	Key Development Sites	Non-Development Interventions
Listed Building	Anchor Points	Alberty House	Proposed Wi-fi Hotspot
Access	Carparks	Bishopric & Freshwater Parade	Pedestrian Crossing Improvement
Key Public Realm	Bus	Blackhorse Way	Public Realm Improvement
Horsham Park	Car	Forum / Plaza & Sainsbury's	Traffic Re-configuration
Ring Road	Cycle	Piries Place	Pedestrian Route Improvement
River Corridor	Pedestrian		
Crossing / Entrances			



- 5.34 The core retail area of Horsham includes West Street, Swan Walk shopping centre, and Carfax. Within this broad area there is a variety of shopping experience provided, with West Street representing the historic high street with small and varied shops with generally mid-high end occupiers; Swan Walk offering larger, covered units with more mid-market occupiers; and Carfax again providing a historic environment, but over a more expansive area with a more civic feel, incorporating street furniture and the bandstand, with occupiers including a high proportion of banks and estate agents. This mix of areas and experiences work well in combination and constitutes the core 'image' of Horsham.
- 5.35 Whilst all of this area is the main shopping area, West Street in particular is Horsham's prime pitch.



West Street

Strategic Direction for the Town Centre

- 5.36 Having assessed the existing town centre, the actions advised to be undertaken to fulfil the vision for the town centre are summarised into the following strategic directions:

Respond to Demographic Change

- 5.37 At present, Horsham town centre caters for a predominately elderly demographic. However, due to the housing development coming forward to the west and north of the town, there is a

need to consider diversifying the town centre offer to cater for a wider audience and encourage greater community participation. Additionally, the new audience should include tourism visitors.

Strengthen Retail and Leisure, Support Employment Growth and the Economy

- 5.38 The role of town centre has changed in the recent years. It is important to diversify the offer and provide a mix of uses to create activity and excitement in the town centre. To facilitate this, town centre proposals should look to provide a mixture of differently sized spaces. Specifically in Horsham, smaller spaces for rent should be made available, which would support start-ups, independent retailers and help to create an entrepreneurial culture. From a tourism perspective strengthening the independent retail offer could help to distinguish Horsham from its competing centres, but to also attract more regional visitors.

Increase and Diversify Housing Provision

- 5.39 Within the town centre, new housing is an important land use. Proposals should include high quality contemporary housing design, to create positive perceptions of Horsham. Town Centre living also reduces pressure on development in the countryside, and supports the retail core.

Improve the Hotel Offer

- 5.40 There is an opportunity to strengthen the hotel offer in the town centre and provide an alternative to Gatwick corporates, road-side hotels and country B&Bs. There is a need for a contemporary, in-town offer for business travellers, weekend tourist and family occasion visitors.

Support New Community Infrastructure

- 5.41 Provision of community facilities is poor in the town centre, yet they are an important asset for creating activity and attracting Horsham residents into the centre. Moreover Horsham will have an even greater role to play in supporting sufficient community facilities in the future as large scale housing developments come forward. Therefore, there should be a focus on considering a new service delivery model to evolve or re-provide facilities, and additionally a delivery model which enables ground floor uses to be activated.

Enhance Access and Movement

- 5.42 At present, the key gateways into the town centre are predominately car-orientated and lead to expansive car parks. This is often the first impression visitors receive of the town centre, and it is visually unappealing and uninviting. As it can be challenging to re-organise the existing car parks, there could be a focus on improving the car park facades, so that they are more

visually attractive. Additional parking provision will need to be made in order to meet anticipated demand in the short to medium term, to facilitate access and support town centre activities. Movement can also be enhanced with better wayfinding, a consistent public realm, and developments which provide landmarks and enhance views.

Evolving Image and Identity

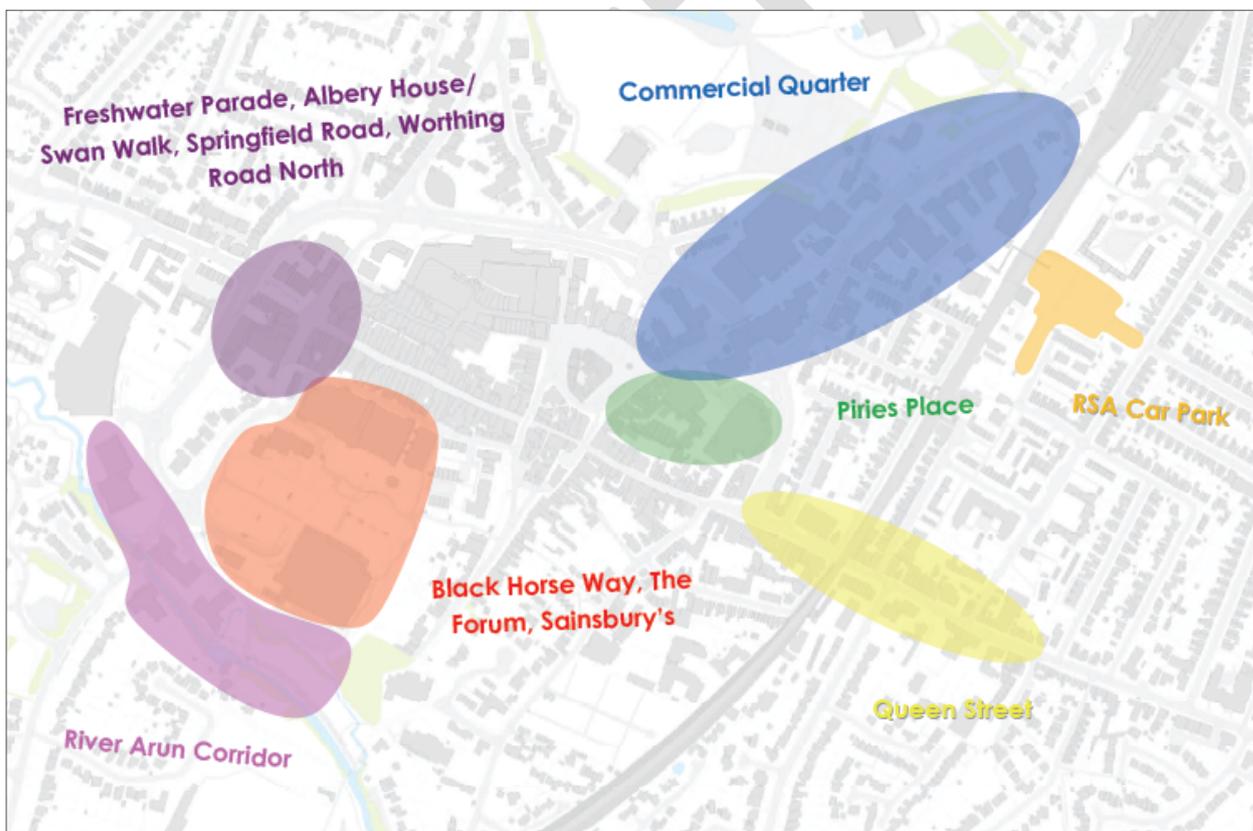
- 5.43 More could be done to define and communicate Horsham's identity as a modern market town. Due to Horsham's proximity to the High Weald AONB, the South Downs National Park and its market town heritage, there is an opportunity to invest in this image and create a new distinctive identity for Horsham. In order to achieve this, there should be reference to historic forms or materials within the town centre. Therefore, buildings, public realm and infrastructure could share graphic identity and aesthetics in retail frontages and signage should be encouraged. Additionally, there should be vigilance against extended blank facades, open service and storage areas, and service encroachment into public realm. A management team and a Business Improvement District could be put in place to promote the town, attract inward investment and to address specific town centre issues.
- 5.44 The development of an overarching Public Realm Strategy that addresses character spaces, linkages and gateways; connectivity and movement between spaces; wayfinding and signage coupled with a design guide would provide a comprehensive guide for future developments in order to preserve and enhance the historic environment.
- 5.45 Public consultation was carried by the Council out in May and June 2017. Survey responses showed significant levels of support for seven strategic directions.

6. Opportunity Areas and Key Development Sites

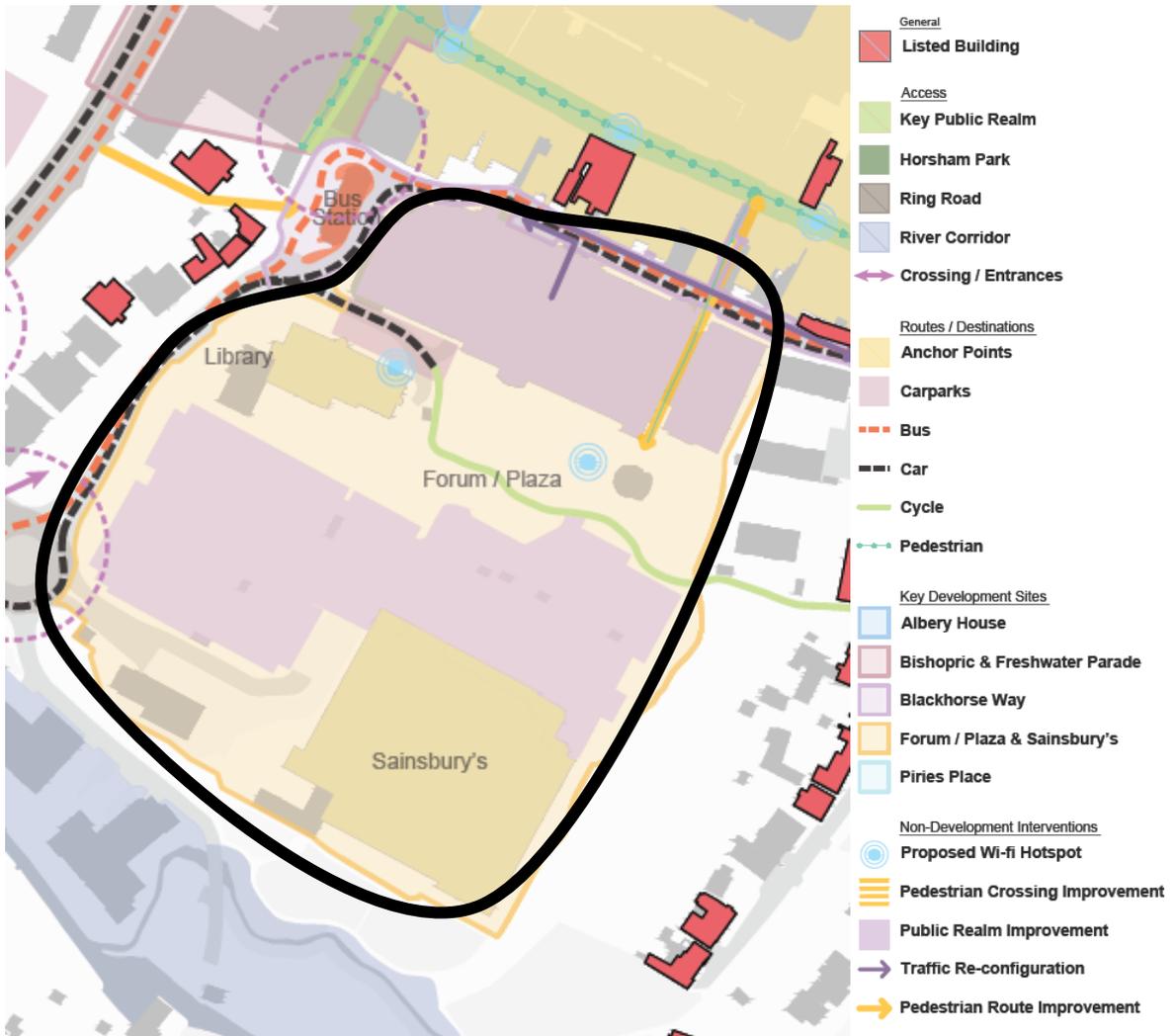
Town Centre Opportunity Areas

- 6.1 Taking into account the layout of the town centre, its current role and its relationship with the wider area, potential areas of opportunity where efforts could be focussed to strengthen Horsham's role and image are assessed below. The Opportunity Areas Plan, below, illustrates the location and extent of each opportunity area.

Figure 15: Town Centre Opportunity Areas



Black Horse Way, The Forum, Sainsbury's



- 6.2 Whilst high footfall at Forum Plaza suggests that the area is well used and that visitors are combining trips between Sainsbury's, The Forum and the retail core, the West Street/Forum link is very poor. The access is narrow and has poor visibility, contributing to a sense that this is the 'back' of the town. There may be opportunities to improve this link through acquisition of retail units or 'softer' approaches including lighting, surface and decorative improvements.
- 6.3 Blackhorse Way itself also suffers by being a back street, put to a variety of competing uses including servicing, informal car parking, refuse storage, car and bus access, and a pedestrian crossing. Site photographs illustrating this are provided below.

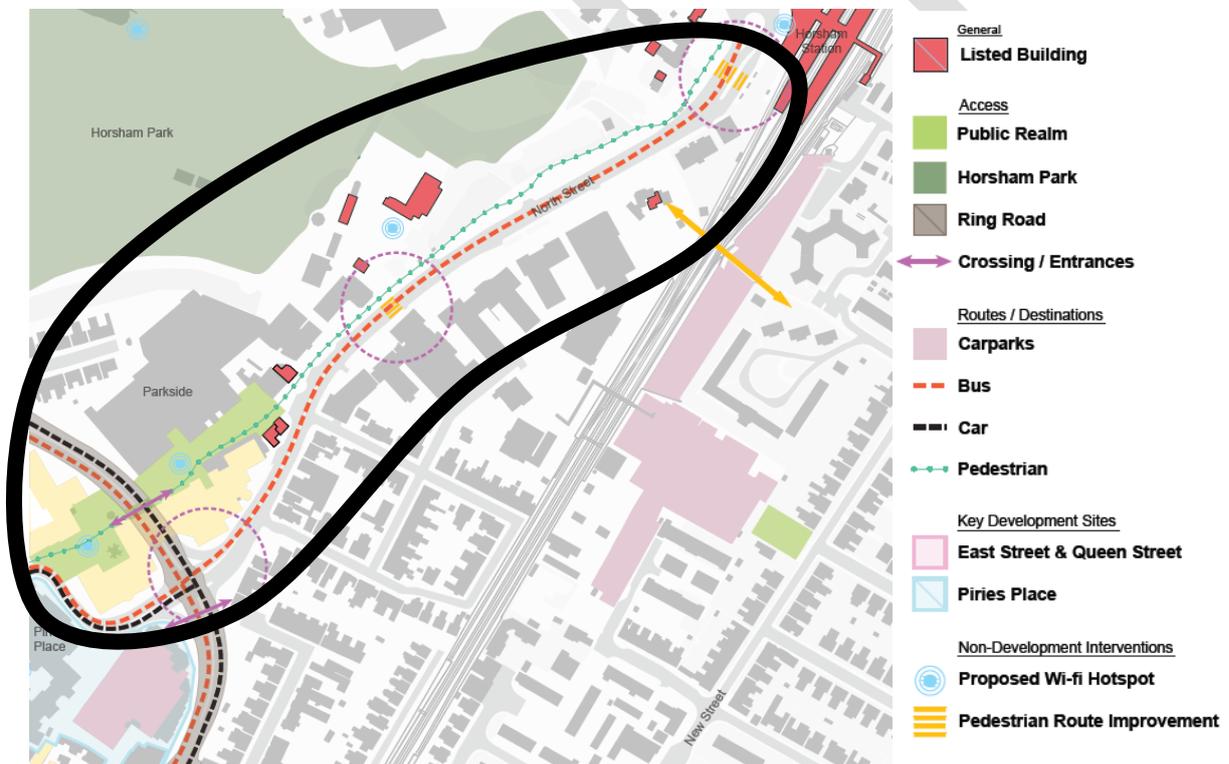


- 6.4 Efforts should be made to formalise and enforce refuse and servicing arrangements, and there may be an opportunity for traffic intervention to reduce traffic flows, improving the pedestrian experience as well as reducing congestion in the rest of the town centre, notably Carfax. This is assessed in greater detail in section 8.
- 6.5 There may be an opportunity to approach The Forum more comprehensively, to restructure the ground floor and improve routes through, to West Street and to Worthing Road and the bus station, and to reconfigure the retail units themselves. It is unlikely, however, that full

redevelopment would be viable or deliverable given the high latent value of the residential units.

6.6 This area also contains Sainsbury's and its car park, which is an inefficient use of space so close to the town centre. Opportunities to redevelop this car park should be investigated, which may or may not include the Sainsbury's store itself, the library and Forum Plaza. This could be an opportunity to introduce more housing into the town centre, meeting housing targets in a sustainable manner, or meeting identified retail floorspace need. Were the library to be included in a comprehensive solution, then there would be the potential to provide a replacement facility that expanded its role or combined with other service delivery, creating a stronger civic anchor for the town centre.

Commercial Quarter

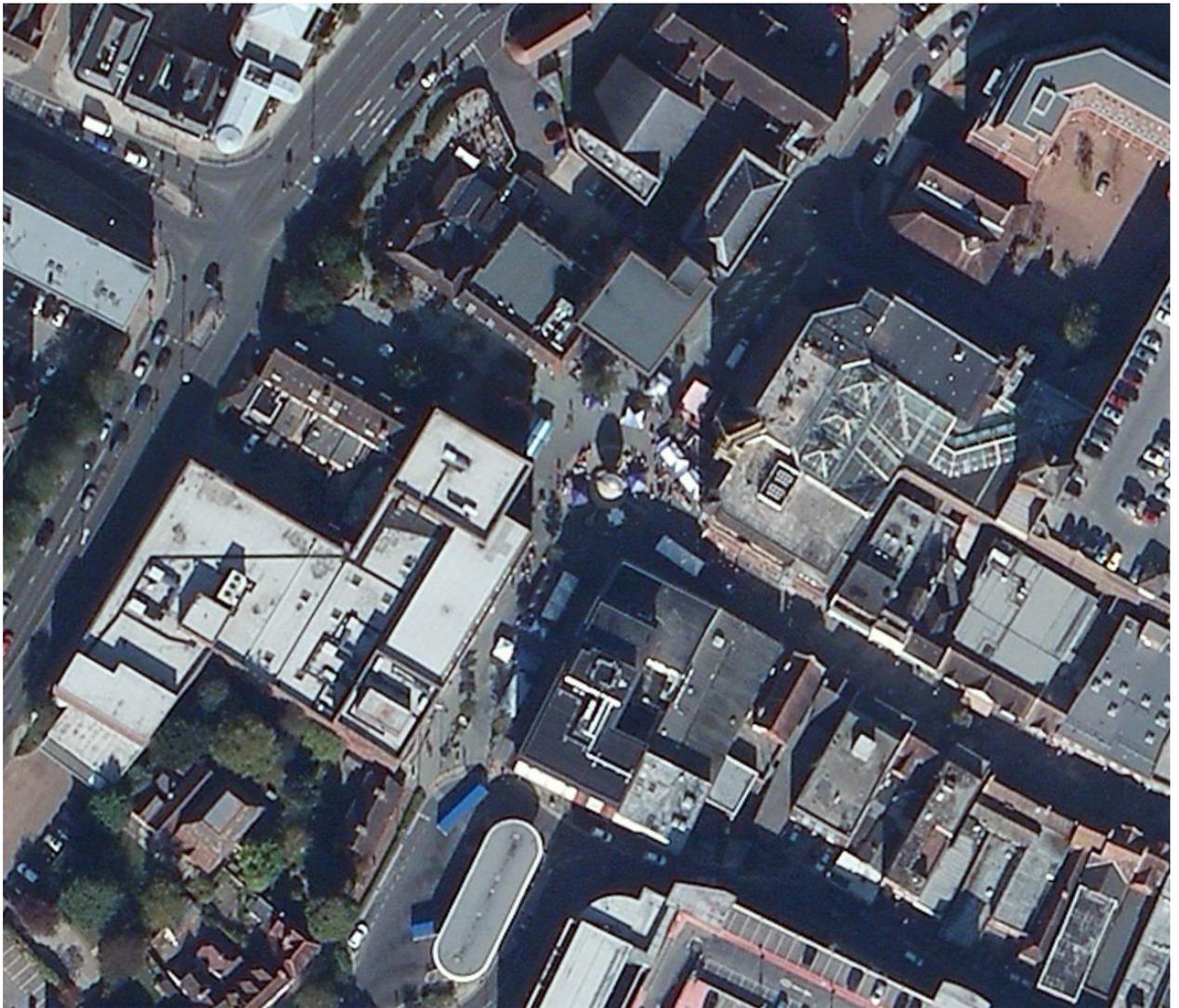




- 6.7 This area should remain relatively unchanged in land use terms. Focusing the office provision in this location would benefit local businesses that need to have direct access to the train station. In common with much of the town centre enhancements, the legibility of the public realm should be a key focus, ensuring employers in this area (or those accessing the town through it) can easily navigate to other parts of the town centre.
- 6.8 Future development in this area should seek to provide a new, more diverse, commercial offer to reflect the small business base within Horsham District and provide opportunities for residents attracted to new housing developments north of the town to start and grow businesses within the town centre. Other complementary uses, such as hotel provision, could also be a beneficial addition to this area, providing accommodation for business users, those seeking to be close to the station and wider 'leisure' visitors using the town as a base for exploring the surrounding countryside.

Freshwater Parade, Albery House, Worthing Road North

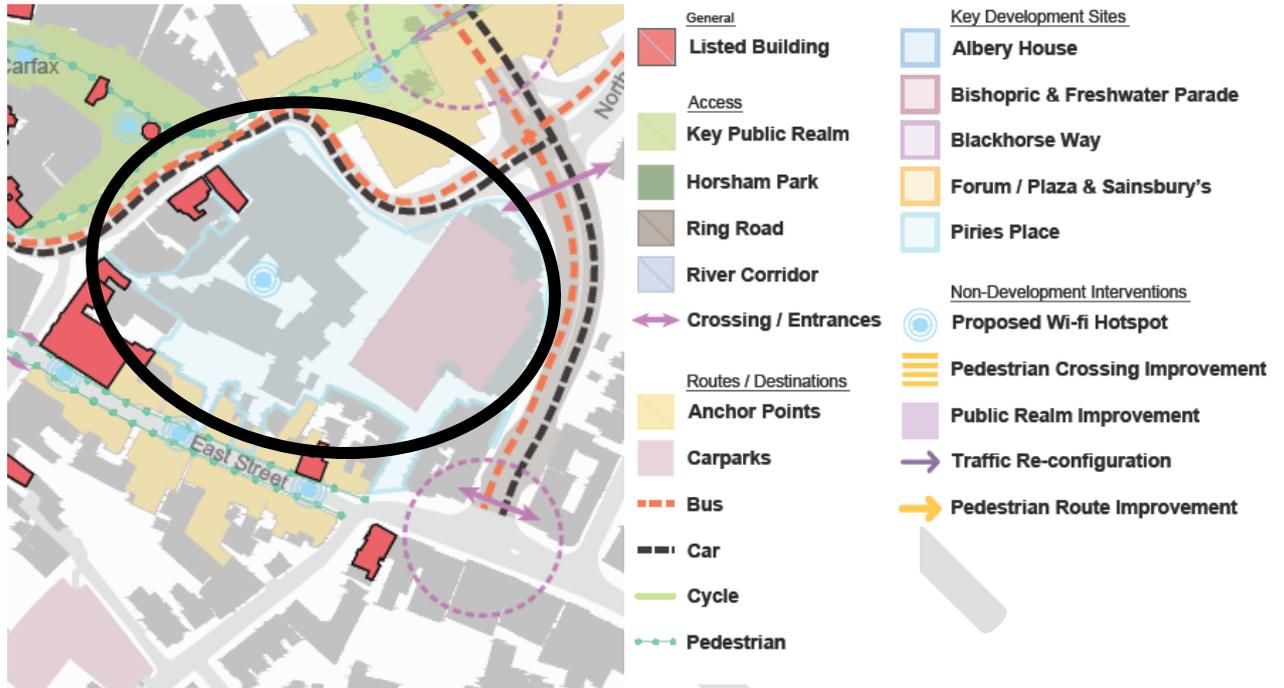




- 6.9 Though this end of the town centre has declined somewhat in recent times, the resulting lower property values present an opportunity for redevelopment or reconfiguration of the buildings and retail units in the location. The arrival of John Lewis at Home and Waitrose to the south west also has the potential to create linked trips and increase footfall, if better links can be forged between them and the rest of the town centre.
- 6.10 Efforts should be focussed in the first instance on improving wayfinding, the public realm and most importantly pedestrian crossings. The route directly to and from John Lewis is dealt with further below, but improvements could also be made to the existing crossing at Freshwater Parade, including the removal of barriers, and potentially the introduction of an additional crossing on the northern side of Bishopric. The Bishopric trees and planting beds also create a visual and physical barrier although the waterfall and stream counteract traffic noise to a degree.

- 6.11 The Bishopric, West Street, Worthing Road and Springfield Road meeting area should also be subject to comprehensive public realm improvement to visually connect the area to West Street and improve connectivity and legibility of the town centre.
- 6.12 With such improvements, proposals should come forwards in the area to repurpose the existing retail units, as indeed they already are in places, notably including Albery House. The Council should ensure that such proposals complement the public realm in terms of materials and built form, integrating this area into the wider town centre.
- 6.13 The Springfield Road area has some potential for redevelopment as the existing uses are relatively low rise in places, in the context of surrounding buildings and Albion Way, and this is a key route into town that is currently uninviting for pedestrians. Proposals in this location should focus on defining the street and establishing a visual connection between the town centre and Springfield Road, north of Albion Way. Proposals may include residential infill development, and/or employment uses.

Piries Place



- 6.14 Following the relocation of Waitrose, there is a risk that the centre of gravity of the town centre shifts to the west. Now is the opportunity for Piries Place to redefine and re-establish its role in the town centre through redevelopment.

REEF Estates Development

- 6.15 The Council granted planning permission on 15 March for redevelopment and conversion of Piries Place for a mix of uses comprising retail, cinema and hotel use together with proposals to



widen Copnall Way.

REEF Estates/ARCUS development proposals – Copnall Way Elevation - Artist's Impression

- 6.16 This proposal will redouble Piries' existing role as a leisure and evening destination, which would also complement the commercial quarter, and build on the success of the East Street cluster.

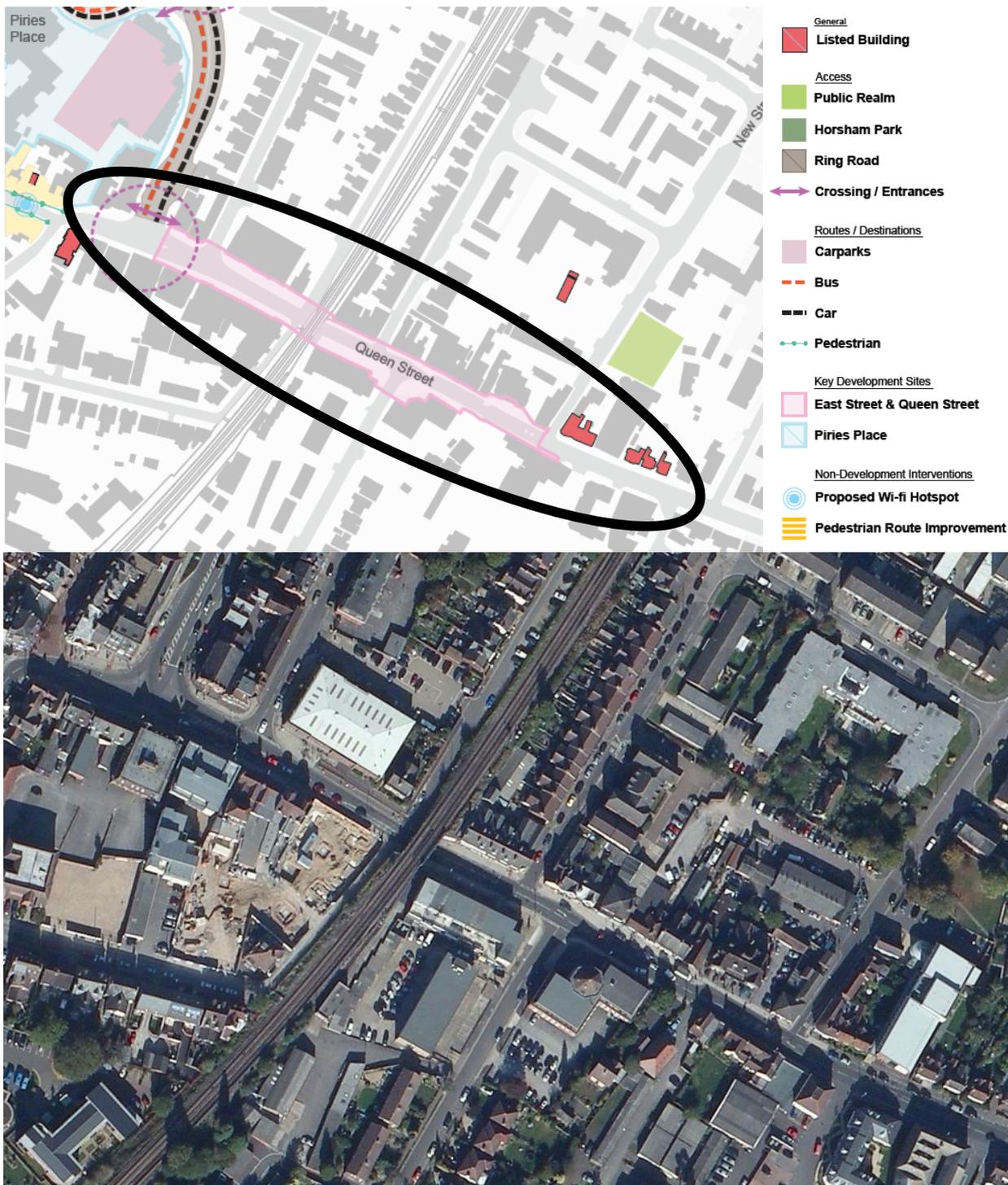
- 6.17 Redevelopment of Piries Place could potentially include the car park, either to expand provision as demand for spaces is likely to increase in years to come. Proposals should also seek to enhance the pedestrian arrival experience from the commercial quarter and North Street.



REEF Estates/ARCUS development proposals – Piries Place Courtyard - Artist's Impression

- 6.18 Given its existing strength, East Street is not included in this opportunity area, though the connections and wayfinding from here to other character areas could be enhanced, as could the sense of arrival from the north through the creation of gateway features.

Queen Street



6.19 Though this is a secondary retail area in the context of the wider town centre that is entirely natural given its location. This role should be supported as it provides the potential for a greater provision of independents and alternative stores. Many of the existing buildings have character and much can be achieved through relatively straightforward frontage improvements. Similar initiatives have been successful at Leyton and Nunhead high streets in

London. This area could also have an identity distinct from the town centre, with consistent public realm features, detailing and public art to create an alternative sense of place.

6.20 Whilst Queen Street is likely to remain relatively separate from the town centre, and indeed this point of difference could be enhanced, the route between the two should nevertheless be improved to increase visits to Queen Street. The section of East Street immediately to east of the rail bridge features blank facades and inactive ground floor uses. There may be potential to redevelop in this location to improve the continuity of the retail frontage.

River Arun Corridor

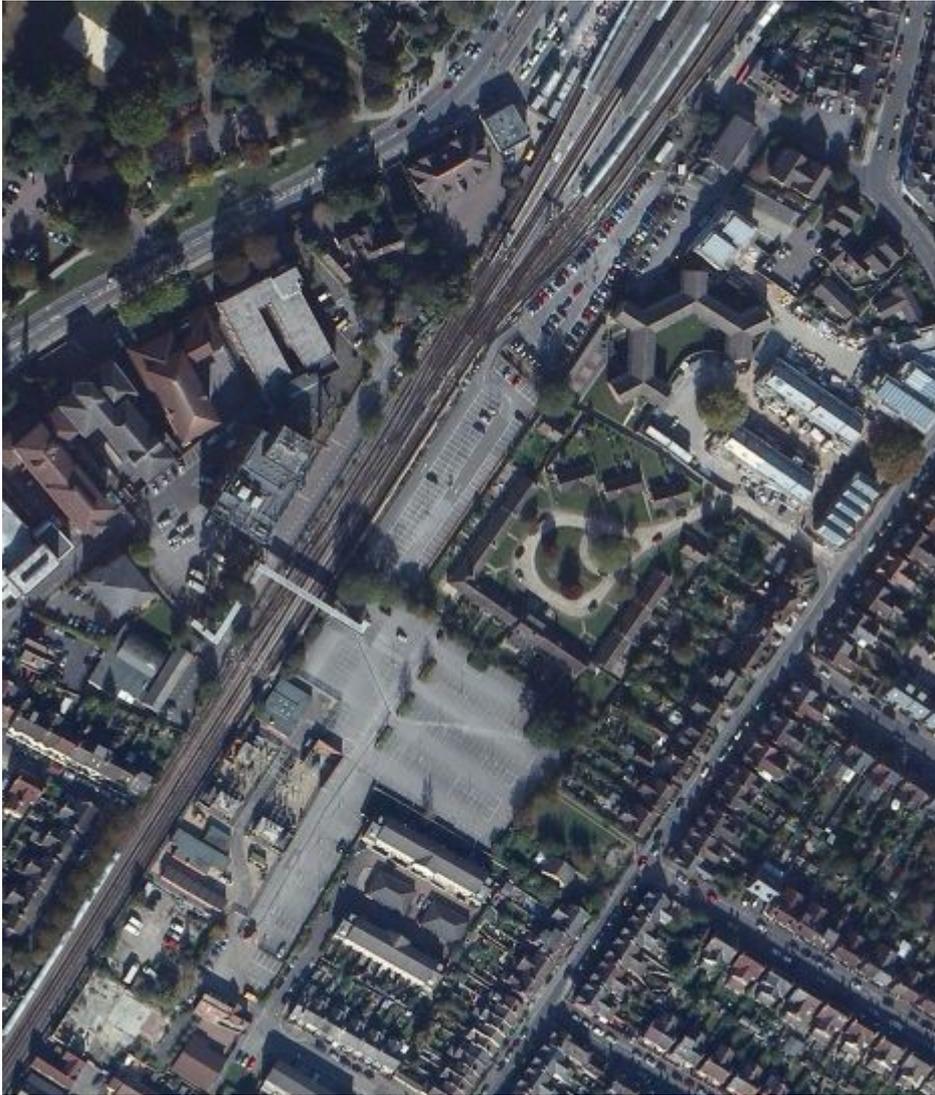


6.21 A significant opportunity exists to better integrate the River Arun into the town centre, creating more usable, informal, green and blue spaces as part of the wider town centre offer and create a counter balance to the more formal leisure offer of Horsham Park.

- 6.22 There is the opportunity to enhance and integrate this corridor with Horsham Park via a new, high quality (and potentially greened) link broadly along the north south axis. This could run through The Causeway, Carfax and Medwin Walk and/or the footpath that runs to the east of Sainsbury's, the Forum, Blackhorse Way, Swan Walk and Medwin Walk and could provide a strategic pedestrian (and cycle) connection through the town to its urban hinterland.
- 6.23 Over the longer term there is the potential to create new residential-led developments along this corridor that make the most of the riverside setting. This would require the relocation of some office uses into other parts of the town so as to maximise the use of the river as a Town asset.
- 6.24 In relation to the Office Outlet and Currys units in Tanbridge Retail Park, whose leases are due for renewal within the next five years, there could be potential for reconfiguring and intensifying retail provision, given its setting adjacent to the new John Lewis store and its frontage onto Albion Way.

Royal Sun Alliance & Station Car Parks





- 6.25 The Station Car Park is located immediately to the south of Horsham railway station, and serves as the customer car park for the station. The car park is long stay, with prices charged for a minimum of a day at a time, and spaces available to be purchased on an annual basis. The car park is well used.
- 6.26 The RSA Car Park is located to the south of Horsham train station and immediately east of the railway lines. It is owned by the Royal Sun Alliance insurance company and managed and operated on its behalf by BMO Global Asset Management. It is used as staff parking by RSA for its offices at St Mark's Court. The car park includes a pedestrian link bridge over the railway to Chichester Terrace and North Street via The Capitol. This is a private link for RSA employees, with access restricted by pass card. It is understood that the car park is well used, and that RSA has no foreseeable intention to reduce its use of the land.

- 6.27 Despite being well used, the car parking is an inefficient use of space as it is all surface parking. There may therefore be opportunities to increase car parking provision for the current operators through the addition of deck or multi-storey parking, and/or introduce other forms of land use. Residential development may be appropriate in this location, given the predominantly residential setting. Whilst a number of offices are located near the station and one may expect that these sites could also accommodate offices, although their position to the east of the tracks may limit this.
- 6.28 Public parking provision could also be secured for the RSA car park through negotiation with RSA, however, given its existing ownership and exclusive use of the site. It may be possible, for example, to secure public access to the car park at evenings and weekends, but not working hours, depending on usage.
- 6.29 Any development would have to be mindful of traffic impacts given access from Station Road, New Street and adjacent residential streets. There may also be opportunities to improve access routes to the town centre through developer contributions.

Other Potential Interventions

- 6.30 There are a number of other potential interventions which are not area specific as follows:
- Whilst the retail core of the town centre functions well, enhancements around Swan Walk and Carfax could nevertheless be made, focussing on improving way finding through both enhanced signage and more coordinated (and better quality) public realm treatments. There are opportunities at Carfax to greatly improve the setting and prominence of the town's key heritage assets in creating an authentic sense of place. These include:
 - Reducing the proliferation of 'A Boards' in front of some units within the pedestrianised area between North Street and Medwin Walk, including 'ad hoc' directional signs for specific businesses;
 - Ensuring consistency and quality in the signage hung from wrought iron brackets on units at a high level throughout the area;
 - On-going repair of individual buildings to maintain the overall quality of the area;
 - Feature lighting schemes that highlight particular aspects of the historic assets could also greatly enhance the area in the evening to complement the range of restaurant and other evening economy uses;
 - Pedestrian Crossings over Albion Way should be reviewed for all the key gateways to the town centre. Currently, links between the town centre and Horsham Park are poor, which

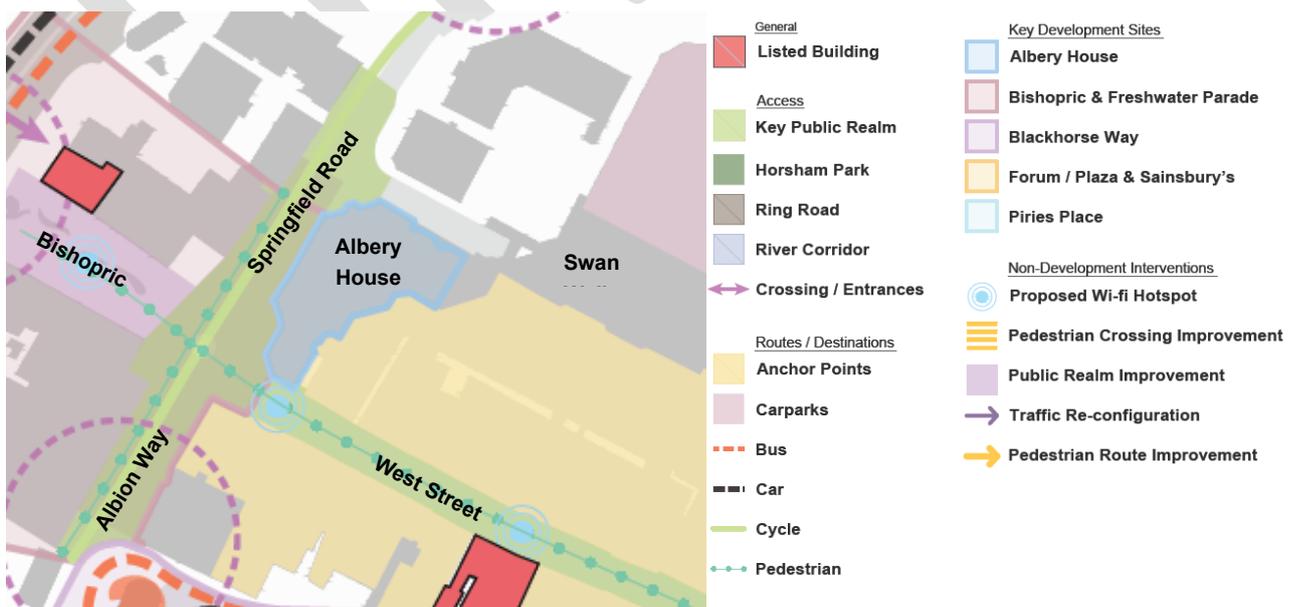
diminishes the potential mutual reinforcement between the two. There may be potential to improve existing crossings, and/or introduce new ones. More radical options may also be available, implementing traffic management measures or realignment to Albion Way. The potential for this should be investigated; and

- Besides the various public realm and signage improvements suggested for the town centre, other 'soft' improvements may include the provision of town centre Wi-Fi hotspots, or 'pop-up' stores. As the popularity of internet shopping continues, and as Horsham's catchment population shifts to include a greater proportion of younger residents, it is important that the town centre diversifies its role. Wi-Fi hotspots would be a relatively low cost addition which would increase dwell times. AVIVA, the owners of Swan Walk, are looking at this for the shopping centre. In addition, well-regarded markets are already established in the Carfax and this principle could be extended to other parts of the town centre, e.g. Freshwater Parade, and to a broader range of goods, e.g. street food, bars or clothing.

Town Centre Key Development Sites

6.31 Following the analysis of areas of opportunity within Horsham town centre, particular development sites with the potential to deliver some of the aims of this Vision have been identified. Each site is assessed in detail to establish the potential form and quantum of development which could be delivered.

Albery House/Western End of Swan Walk



- 6.32 The western end of Swan Walk is within the identified Freshwater Parade, Bishopric, Springfield Road and Worthing Road North Opportunity Area. The western end is the worst performing part of the otherwise successful shopping centre, and the access through the centre, between Springfield and Worthing Roads and the Carfax, is poor. The necessary lifts and escalators are within the existing Wilkinson store rather than a shared mall environment, and overall the route is disjointed and meandering. The ground floor layout at Springfield Road also results in a long, blank façade.
- 6.33 The upper floors of the building form Albery House, which comprises office floorspace currently occupied by Trend (c 2,700sqm).
- 6.34 Aviva, the owners of Swan Walk, have recently obtained planning permission for the redevelopment of the whole building, comprising amalgamated retail units at first floor level, a multiplex cinema on the upper floors, and A3 restaurants at ground floor level facing West Street and Springfield Road with external dining areas with the resulting loss of the office accommodation. ~~The application is yet to be determined but Council planning officers have recommended approval.~~
- 6.35 The approved development is considered of benefit to the town centre. The cinema and leisure-retail combination will add to the evening economy and diversify the overall town centre offer. The proposals will also establish a much clearer, more direct route between Springfield Road and the Carfax through Swan Walk. There will also be a significant enhancement of active frontages in Springfield Road.



Visualisation of Aviva proposals, viewed from Bishopric

- 6.36 In order to maximise town centre benefits, however, the scheme should also contribute to local public realm enhancements, and there should be some visual consistency between this and other proposals nearby.
- 6.37 It is noted that the loss of 2,700 sq.m of office floorspace is not insignificant, although this is not Grade A office space. Dependent on the conclusions of employment capacity studies in the coming years, it may be necessary to seek to replace this and other office floorspace lost through permitted development. Strategically the northeast corner of the town centre is the best location for new office floorspace and though there are no obvious current redevelopment sites, redevelopment of some of the buildings along North Street may be appropriate in time, as the buildings age.
- 6.38 The potential for the redevelopment or extension of Swan Walk more widely has also been considered. There is some potential for an upward extension of some stores, either into existing store areas or through additional storeys. However, aside from the structural considerations, it is considered that this form of development is unlikely to be viable. Upper floors of stores command less value than the primary frontage and therefore any enhancement is unlikely to cover the cost of such works. A more effective means of introducing larger store areas would potentially be to reconfigure and combine existing units. It is expected that Aviva will continually monitor the potential for such intervention as part of their asset management function, and hence such a change would be likely to come forward if viable, bearing in mind the lost income and potential compensation to tenants which this would entail.

6.39 There may be further opportunities to enhance the role of Swan Walk as a retail and leisure destination by encouraging complimentary restaurant and other leisure uses so enhancing the diversity and competitiveness of the town centre. While supportive of a diverse offer this should not be at the expense of Swan Walk's primary function as a comparative shopping destination. (Subsequent paragraphs to be renumbered)

Black Horse Way / The Forum / Sainsbury's



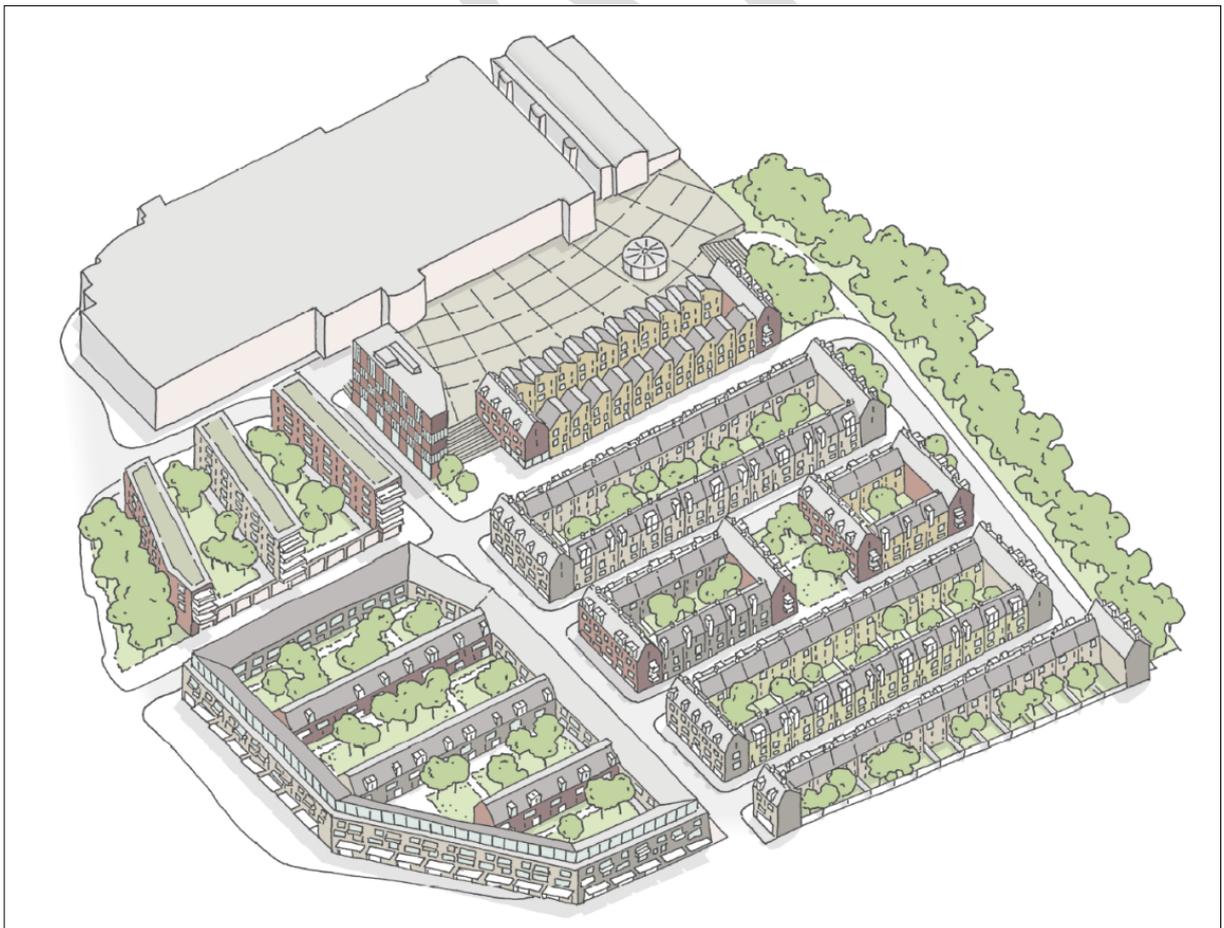
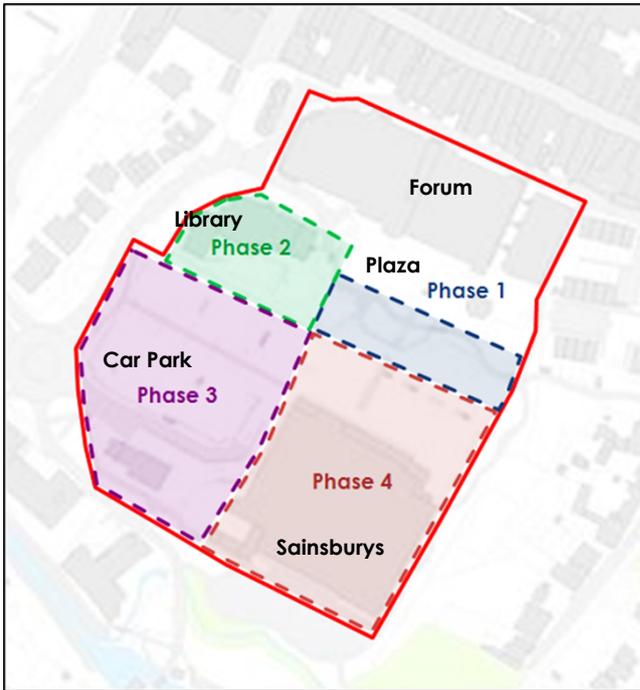
6.39 This area is identified as an Opportunity Area due to its proximity to the retail core of the town centre and as in large part it represents an inefficient use of space. There is the potential for a comprehensive development approach in this location, combining the car park with the requisite re-provision of the Sainsbury's store, as well as redevelopment and re-provision of Horsham library.

6.40 While analysing the development potential to include the whole of the Forum it was considered that full redevelopment of this element would unlikely be viable. There is a high latent value in the building through a combination of the retail, residential and car parking uses. In addition, obtaining vacant possession of the residential units would be difficult and time consuming as well as costly. It would most likely require a Compulsory Purchase Order (CPO) to acquire the site and potentially re-provision of existing uses. There may be the potential, however, for reconfiguring parts of the ground floor retail provision to improve connectivity and visibility for pedestrians.

6.41 As part of the Council's wider asset management strategy they have just acquired the freehold interest of the Forum comprising the car park and four retail units - Dunelm, TK Maxx, Blacks and Benson for Beds.

- 6.42 The potential to include the bus station was also considered. However, the facility is considered to be **fairly** ideally located for access to the town centre as it is. Moving the bus station is also likely to be costly, with relatively little balancing upside in terms of enhancing values, further impacting on the potential viability of comprehensive approaches.
- 6.43 The potential for redevelopment in this area has instead focussed on three main areas:
- South of Forum piazza (*Phase 1*);
 - Library and west of Forum piazza (*Phase 2*); and
 - Sainsbury's supermarket and car parking (*Phases 3 and 4*).
- 6.44 The area immediately to the south of the Forum piazza is considered suitable for residential and retail development. Development in this location would provide enclosure to the Forum, maintaining its quality as an attractive, open public area, but providing greater definition and shielding the piazza from wind. This development would also add to retail capacity in this central location, reinforcing the role of the core retail area and providing an opportunity to deliver more modern, larger units attractive to occupiers.
- 6.45 The library could be redeveloped for residential use, but also re-provision of the library itself in a modern facility, and potentially other community uses e.g. a GP surgery. The new block could meet the demands of a modern library in providing greater IT and study areas, and it could provide flexible space for local community groups, schools or businesses, including re-provision of the Citizens Advice Bureau.
- 6.46 If the redevelopment of the Sainsbury's store and car parking were considered appropriate, it could be divided into phases. The first would be the relocation of the existing store to a more prominent location at the southwest corner of the site. This could potentially provide a store larger than the current facility, and would also integrate multi-storey car parking within the same structure. Given the current trading position of the Sainsbury's store the option to develop the store and car park is not viable at this time and Phases 3 and 4 will not be progressed as part of the town centre Vision.

Phasing Plan

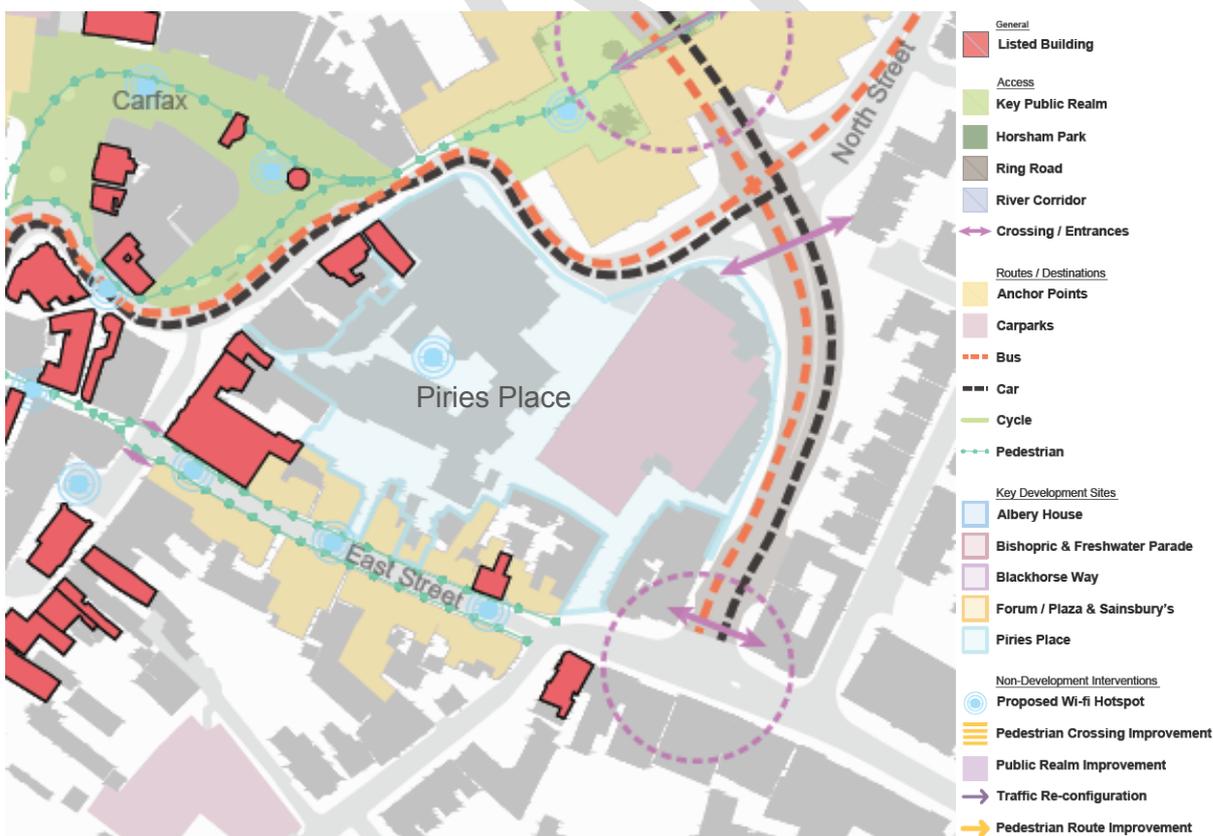


A sketch impression of how redevelopment the Forum, Library and Sainsbury's could look

6.47 The site also includes Black Horse Way. Potential interventions in this regard are primarily discussed in the preceding chapter. The potential to incorporate these changes with the wider redevelopment should be explored as there is the possibility of using the value created by the development to cross-subsidise some measures, e.g. the purchase of existing units to widen the West Street access, and visual improvements.

6.48 There is potential to introduce additional traffic measures along Blackhorse Way. Currently traffic exiting from the Forum car park must turn left back to Worthing Road. It is recommended that re-introducing one way traffic from west to east should be investigated. This would reduce town centre traffic flows, and improve pedestrian safety at the crossing between West Street and the Forum. Further than this, it may be possible to restrict traffic west of the car park to bus-only (except for servicing) at some times of day. This could further reduce traffic flows over West Street and through Carfax, enhancing pedestrian priority in these spaces. It may also improve bus journey times. Detailed traffic modelling would be required to confirm the feasibility of these approaches.

Piries Place



6.49 As an Opportunity Area, leisure, hotel, office, residential and retail were all identified as potentially acceptable uses in this location. A development scheme has recently received

planning permission at this site, for a mix of flexible retail, restaurant, refurbished office, hotel and cinema uses.

6.50 The scheme proposes to redevelop the vacant unit previously occupied by Waitrose, refurbish a number of existing retail units, introduce a new build hotel, open up the central square including with better access, and improve the public realm including with new paving and street furniture.



6.51 This scheme is considered positive for the town centre in that it is bringing a major vacant unit back into use and introducing new uses at the eastern end of town, where there may otherwise be a danger of stagnation. The retail units proposed are generally more substantial than others in the town centre, diversifying occupier choice. The introduction of the hotel also helps to meet the need identified in earlier sections, and this is considered a suitable location for this use in the context of the wider town centre.

6.52 The cinema is intended to be operated by Everyman, and will have 3 screens. This is considered to be a different offer from the proposed multiplex cinema at the western end of Swan Walk. Recent survey work undertaken as part of the Horsham Town Retail & Leisure Study 2016 also confirms that much of the potential local cinema trade it lost to other centres,

particularly Crawley. As such, it is considered that there is room for both of these cinemas in the town centre. The Council will, however, need to consider the potential impact on the Capitol Theatre. Whilst new film screenings are only a part of the programming at the Capitol, Everyman itself offers more than just new blockbuster releases, and there will inevitably be an element of competition. The Council should carefully review The Capitol's cultural offer to diversify and broaden its appeal.

- 6.53 In terms of office floorspace, overall the scheme represents essentially a re-provision of existing space, some of which will have flexibility for other uses, albeit all the space will be refurbished. Due to its proximity to the Commercial Quarter, this site could offer potential for a greater provision of employment space, particularly flexible working space. The site may also have offered the opportunity to provide town centre residential units. It is acknowledged, however, that there is a limit to the number of different uses that could feasibly all be promoted.
- 6.54 As with proposals at Albery House, care must be taken to ensure that this scheme integrates well into the town centre. Access between Piries Place and the Carfax, Copnall Way and East Street should be enhanced and made clearly legible, and materials and massing should not detract from the overall historic character of the town centre.
- 6.55 The proposals do not include the Council-owned Piries Place car park. The Council is investigating the potential to reconfigure this car park (to meet modern space requirements) and also to add additional decks to increase capacity to meet future demand forecasts.
- 6.56 There is the potential to do more with the car park, e.g. add residential development either at the top of the structure or around the outside. However, such development would be something of a compromise with uses which would be unlikely to sit comfortably together. There are also likely to be structural issues which it would be expensive to resolve. If alternative uses were to be proposed for the car park, a comprehensive redevelopment solution would be more likely to be successful. This would, however, likely result in the loss of car parking, whereas the opposite is projected to be required.

Office Outlet / Currys



6.57 The siting and context of this plot would lend itself to further retail development, especially following the arrival of John Lewis and the prominent nature of the site. It is understood that the current leases expire in less than five years which could lend itself to redevelopment at that point.

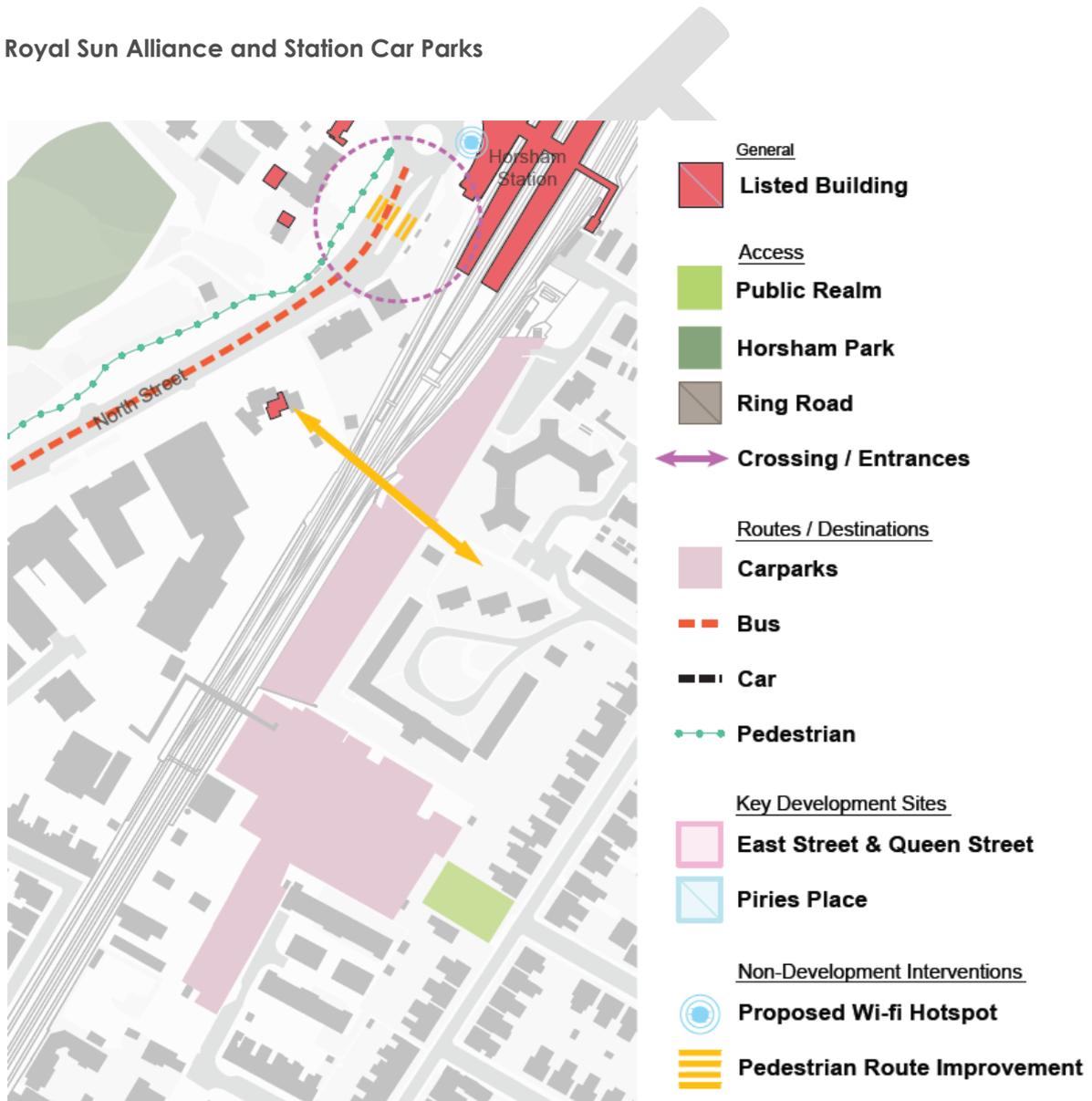
6.58 Having assessed the site, it is considered that redevelopment would not comprise greater plot coverage than is currently the case, as it is a constrained site. However, there is potential to introduce 2-storey development in the place of the current 1-storey buildings. This could provide modern, double-height with mezzanine retail space, which could provide for an increase of c 1,640sqm net retail floorspace. The current buildings are single storey and sit on lower ground adjacent to the river Arun and screened by mature trees.

6.59 Such space would typically be attractive to occupiers who are comfortable in both in-town and out-of-town locations with flexible formats. These include major clothing and craft occupiers such as Next, TK Maxx and Hobbycraft. This is likely to be an attractive pitch for these occupiers, and could assist in attracting them to this town centre location as opposed to out-of-town pitches and adding to the overall Town Centre retail offer.

6.60 It will be important to ensure that sufficient car parking and servicing arrangements are available at the site, hence the assumed consistent site coverage. There may be an

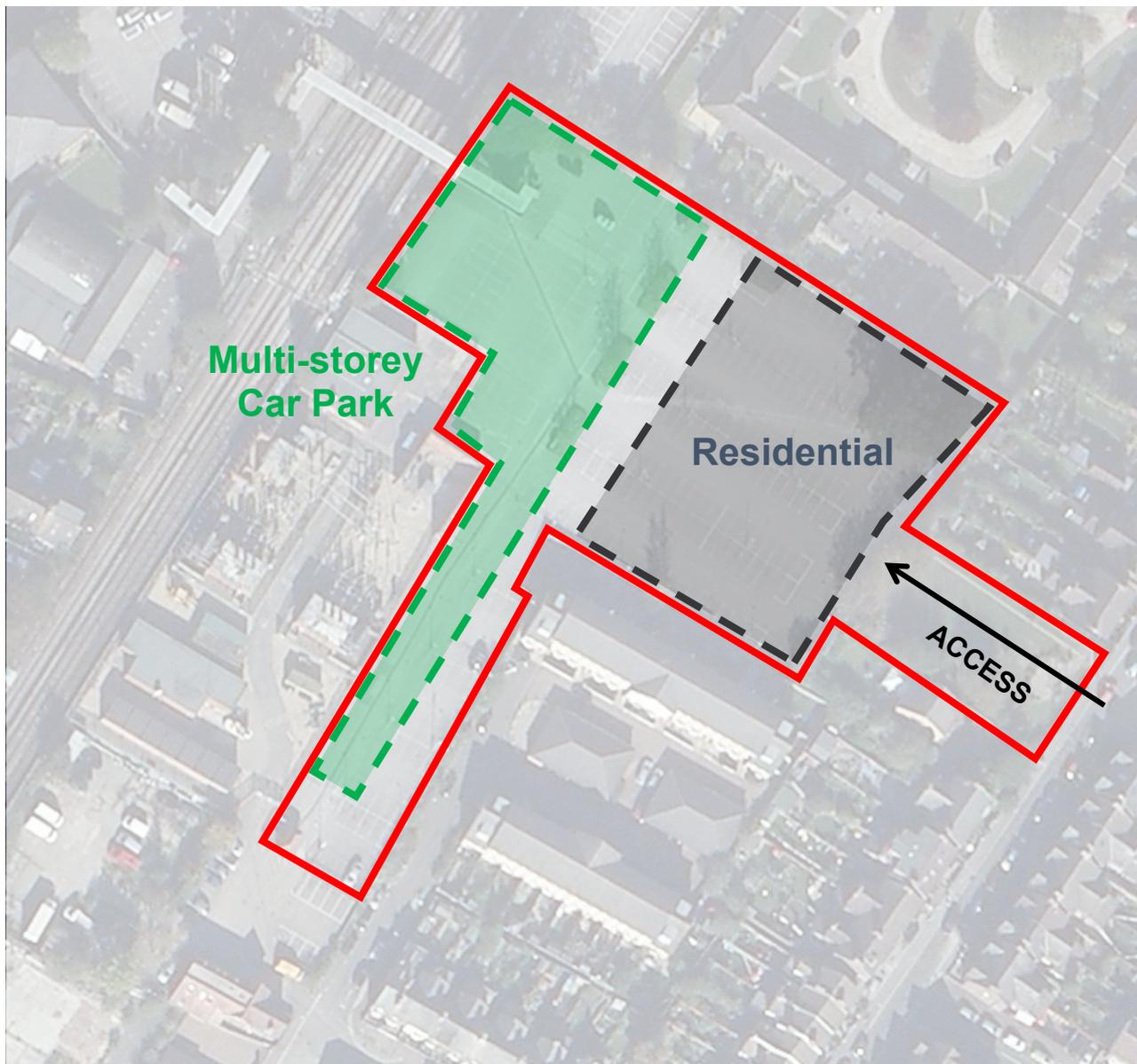
opportunity to utilise the levels of the site to increase parking provision. The site slopes significantly downwards from north to south, and therefore it may be possible to construct part of the southern portion of the redevelopment over a podium, with parking beneath. It is estimated c 25 additional spaces could be provided in this manner. This will increase the construction cost of the development to some extent, but should also enhance value. The increased provision would also result in a net increase of car parking in the town centre, though increase the overall storey height of the southern part of the scheme.

Royal Sun Alliance and Station Car Parks



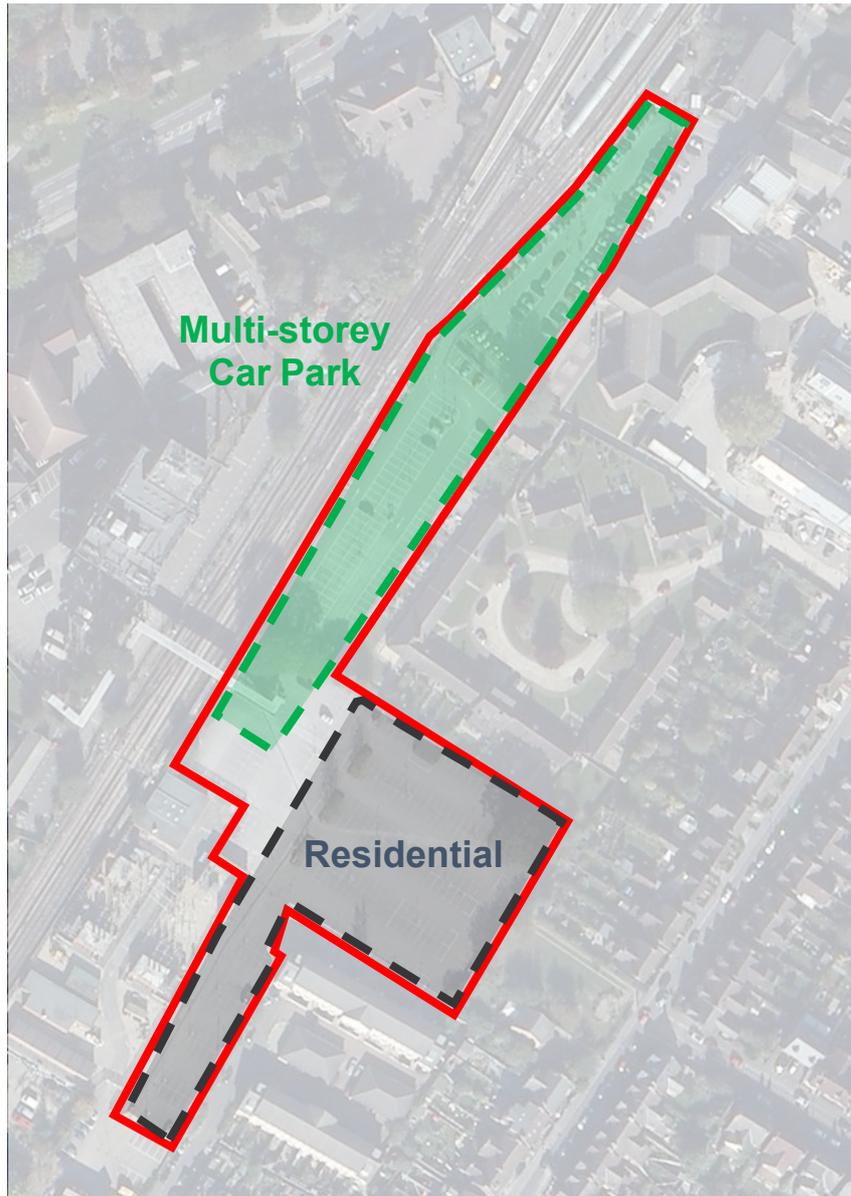
6.61 In assessing the RSA car park portion of the site, this may be suitable for part residential redevelopment, with the addition of multi-storey parking to the remainder to re-provide the spaces lost. Discussions with RSA confirm that it would require at least the retention of the current number of spaces in order to release part of the site for redevelopment. Through the

development of a 3 storey car park element at the west of the site, it should be possible to replace car parking spaces lost through redevelopment of the east of the site, approximately 145 spaces, resulting in no net loss of spaces. These areas are illustrated in the plan below:



6.62 Development of the site in this manner would require the provision of additional access. The site is currently accessed only from the south, via Victoria Street. There is land, owned by the Council, which RSA already enjoys a right of way over, to the east of the site. If this could be included in the site then this could provide separate access to the site, opposite Devonshire Road. Residential development would not be practicable in the absence of this separate access.

- 6.63 Alternatively, a scheme to increase car parking provision alone, thereby potentially making parking available for general public use, may be deliverable on the RSA car park site, allowing for provision for public use. This is not considered to be re-development per se, but would require negotiation of access and terms of use to be delivered.
- 6.64 The size and shape of the site does not appear to allow for all potential aspirations for the RSA site to be delivered together. RSA themselves require the retention of the same number of spaces; with this constraint, the site could either be part developed for residential use with a multi-storey added to the remainder to preserve RSA's spaces, or be used to intensify the car parking use for a net gain of spaces, potentially opened up for the public, but not both.
- 6.65 Considering the station car park, it may be possible to promote part of this site for residential development. However, the layout of the site does not appear to lend itself to being able to accommodate residential development and to maintain the present number of car parking spaces through addition of a multi-storey. It would not be suitable for residential development in the northern section given this would isolate the remaining car parking from the station. However, the northern section does not appear to be of sufficient size to provide for replacement of lost space if the southern section were to be developed for residential use.
- 6.66 When considering the RSA car park and the station car park in combination, the site can be treated more flexibly. A greater proportion of the RSA car park is likely to be capable of residential development, potentially not having to rely on the provision of access through the park area, is a multi-storey could be built over all of the station car park and part of the RSA car park. This is illustrated below. Combining the two sites in this manner will require the agreement of both landowners, and arrangements between them for joint use of the car park would be required.



7. Steps to Delivery

- 7.1 This chapter summarises approaches to deliver the proposals presented in this report. It deals firstly with specific sites where development proposals may come forwards. This is followed by other areas of potential future development focus and non-development interventions, and concludes with more general town centre improvements.

Key Development Sites

7.2 Delivery approaches for the Key Development Sites identified in previous chapters are discussed below. Where there are already proposals by private developers for a site, i.e. Albery House and Piries Place, delivery approaches are not considered. Section 6 does, however, include discussion of how these schemes should be integrated into the town centre.

Black Horse Way / The Forum / Sainsbury's

7.3 Proposals for this site necessarily require the agreement of Sainsbury's in order to progress. Though the scheme is divided into a number of phases, any one of these would require the cooperation of Sainsbury's to be promoted, given Sainsbury's is the freeholder of the entire site, including beneath the Forum piazza. As such, early and continued engagement with Sainsbury's is required.

7.4 Any scheme involving significant disruption to the Sainsbury's store is unlikely to be viable, given its strong trading position. Phases 1, 2 and 4 are viable in themselves, and there is some potential to promote schemes including these elements in these locations, but it would need to be undertaken in a manner with minimal disruption to the food store. Phases 3 and 4 are therefore unlikely to be progressed, but there is the potential to undertake Phases 1 and 2 in isolation.

7.5 Undertaking phases 1 and 2 would still require the agreement of Sainsbury's. However, this could be forthcoming given the development could be undertaken with minimal disruption to the food store, given construction access could be from Worthing Road. The disruption would likely comprise temporary loss of access to car parking spaces beneath the Forum piazza, and reduced pedestrian access between the food store and the town centre/West Street. Careful construction management and phasing could, however, preserve alternative pedestrian access routes. Phases 1 and 2 in isolation generate a development surplus, some of which could be used to compensate Sainsbury's and other local stores for this disruption.

7.6 To progress Phases 1 and 2, engagement should be held with Sainsbury's and West Sussex County Council (WSSCC) to understand any concerns it may have, and legal and structural due diligence checks should be undertaken to understand the feasibility of undertaking development on the Forum piazza, including reference to the existing ownership structure and the nature of any rights parties may hold. The relative rights and interests held by the parties have not been reviewed as part of this study but it is understood that Sainsbury's owns the car park beneath the Forum and the Council owns the piazza, presumably on a leasehold basis, and WSSCC owns the library freehold.

- 7.7 Sainsbury's' interest in the parking area south of the piazza could potentially be purchased for the development at market value. Development above/on the piazza may, however, require amendments to the existing ownership documents, e.g. amendments to leases to enable development. Again, there may be a cost associated with this.
- 7.8 The interest of WSCC could be dealt with through a sale and leaseback of land where the current and new libraries will be sited. Alternatively, it may be possible to form a Memorandum of Understanding between WSCC and Horsham District Council to jointly promote the development.
- 7.9 Following this, the Council can engage in soft market testing, informally at first with reference to forming ideas, and then more formally with worked up designs before putting the proposals to market. This can be undertaken simply by telephone or informal meeting, and then through a more formal process of questionnaire and written response. As these phases are not straightforward residential-only proposals, it will be important to establish a list of relevant developers who are likely to be interested in the opportunity before starting the process. If possible this should comprise both local and national organisations to ensure a broad range of views is taken into consideration.
- 7.10 Reviewing the results of the recently completed Horsham Town Centre Retail and Leisure Study (2017), and its identification of retail floorspace need in the town centre, there may be the potential for an alternative approach for the Sainsbury's car park site, i.e. the areas comprising Phases 3 and 4 of the residential-led scheme. It may be possible to promote an alternative retail-led scheme in this location. This could comprise a deck over the existing car park, preserving the existing number of spaces, with new retail frontage above, along the key pedestrian route between Sainsbury's and West Street.
- 7.11 This could potentially help to meet some of Horsham's anticipated future retail floorspace capacity, and would not entail the moving of the existing Sainsbury's store. There would still be disruption to the store, but not on the same scale as currently envisaged. Such a scheme could also feasibly comprise some flatted residential development to help meet some of Horsham's housing need. It is noted that the overall density/scale of the development would be greater than currently envisaged, but given retail floorspace requirements it may be appropriate for this town centre site to include a greater proportion of retail than proposed under the residential-led approach.
- 7.12 The potential for this and other alternatives on this part of the site could be considered whilst still promoting Phases 1 and 2, as development of the earlier portion would not prejudice that of the latter, though it is important that key routes are preserved.

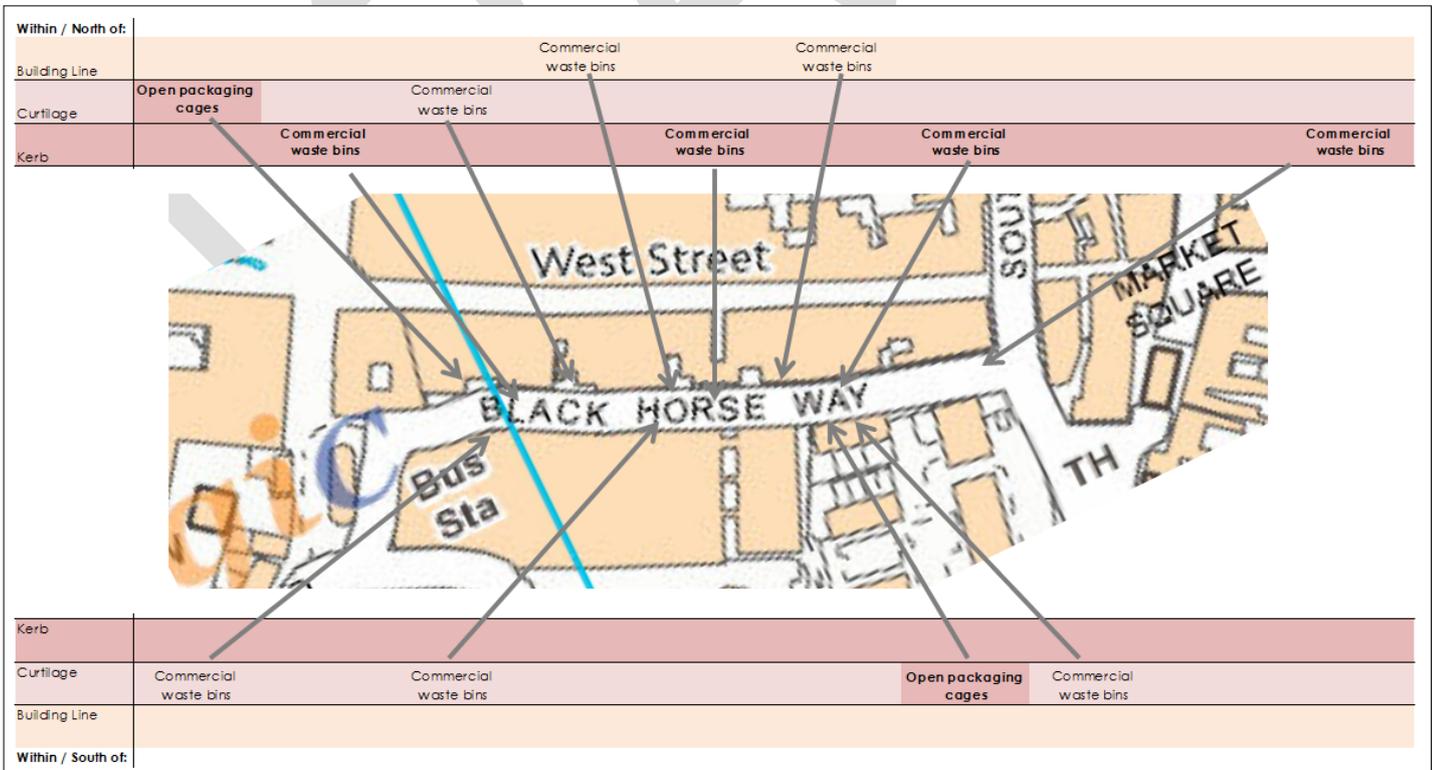
7.13 It should be noted that, whilst there may be significant viability issues with the development of the Sainsbury's store itself, the food retail sector changes rapidly, and the current overtrading Sainsbury's store may not continue indefinitely in its current form. It is feasible that in the future, with changes to the sector, demand for large format food stores may fall, and hence the preceding analysis could change significantly. This should be kept under periodic review.

Black Horse Way

7.14 A number of issues have been identified with Black Horse Way, with the combined effect that this street detracts from the town centre. Waste storage in the street is spread across both sides, including in open containers and not within defined areas. There is also a lot of informal car parking. The street is also used for servicing, provides access to the Forum car park, has numerous bus routes along it and provides general vehicular access to the Carfax and Causeway. There is also a pedestrian crossing between West Street and the Forum, which is the primary route through to Sainsbury's, but is cramped and offers poor visibility of oncoming traffic.

7.15 In terms of waste management, the existing situation is summarised in the plan below:

Figure 16: Blackhorse Way Waste Analysis



- 7.16 The response to this should primarily be one of enforcement, to ensure that all traders store refuse within their curtilage only. In addition, all waste should be stored within closed bins and not in open containers including packaging cages. Enforcement could simply be by way of engagement with nearby occupiers in the first instance, to draw attention to the Council's wish to improve the situation. Only if the situation persists would more punitive measures be considered.
- 7.17 Enforcement in this manner would also seek to restrict the use of the street for car parking. Occupiers could feasibly continue to park within their respective curtilages but not if this would have a knock-on impact on refuse, and parking cannot occur on public areas. Stricter parking enforcement could rectify this latter point.
- 7.18 Should issues persist, the Council may want to consider intervening more directly by installing bin store boxes and fences. This could clearly demarcate areas intended for refuse as distinct from the remainder of the street. Numerous storage fences/boxes would also offer the opportunity to introduce coordinated street furniture design and colour along the street. Some public funding may be required to provide for this. Stores could be located where bins are already placed, but have partitions added to separate and screen the bins. There is also the potential opportunity to introduce new stores through the acquisition of currently vacant retail units.
- 7.19 There may also be benefits to introducing street decoration more widely, including introducing murals to blank facades or banners to street lighting. This would have the effect of brightening the street aesthetic and diverting the eye away from street level.
- 7.20 Regarding the pedestrian crossing, the route is along a narrow passage from West Street, which includes a number of heritage assets, and so alteration to this is unlikely. Towards the end of this passage, however, is a more modern retail unit, which could feasibly be altered to widen the route at the point it meets the crossing. This would require the purchase of the unit; engagement with the owner should take place as a starting point to determine the potential for this. Negotiation could then commence regarding the purchase, which the Council would need to secure funding for via a business case.
- 7.21 The route could also benefit from improved lighting, potentially to include feature lighting along the internal wall north of Black Horse Way, and new paving. A shared surface could be laid for pavement and the crossing itself, to encourage slow driving and reinforce the sense of pedestrian-primacy.

7.22 Finally, traffic could be reduced on Black Horse Way by making it part one-way. If two-way traffic were only permitted up to the entrance to the Forum car park, from Worthing Road. Traffic from the other direction, from Carfax, could be limited to the junction with Hewells Court and not allowed further. The combined effect of this would be to reduce traffic flows at the point of the pedestrian crossing, again further strengthening the impression of this as a key walking route. These changes would also enable the width of the road between the Forum car park and Hewells Court to be reduced. This would provide more space for formalised parking and refuse storage, and the potential for wider pavement space and potentially even some street planting. Implementing this would require traffic modelling in the first instance, but would be relatively straightforward to introduce through new road signage.

7.23 A sketch impression of how Black Horse Way could look with these improvements is provided below.



7.24 The overall effect of these changes would be to improve the impression of the street. This is a key, well-used pedestrian route which currently detracts from the overall historic, market town impression of Horsham that a visitor may otherwise have. Improving the view and feel of the street as experienced from the north-south pedestrian route would be of significant benefit.

Office Outlet / Currys

7.25 Whilst an improved retail offer in this location is likely to be attractive to occupiers, the scope for increased density is limited and it is therefore unlikely that the site has very significant

redevelopment value. For that reason, it is perhaps more likely that such a scheme could be delivered by the existing owner, rather than a third party.

- 7.26 The exiting occupational leasehold interests are due to expire in June 2022. This suggests that this scheme would most likely come forward at this time, rather than before. There would, however, be the potential for earlier development depending on changes in the occupier market, e.g. the changes that are currently taking place in respect of Office Outlet, which could feasibly drive consolidation on the part of the existing occupiers. Earlier development also becomes more likely the closer one gets to lease expiry, as the latent value in those leases falls.
- 7.27 Our analysis does suggest, however, that a rational owner may at that time seek to renew leases or re-let, rather than redevelop. Clearly this will depend entirely on the nature of the occupier market at the time, and this should be kept under review. Retail trends are developing at a pace, and as a result there may be opportune times to engage with the landowner before the lease expires, or it may be preferable to wait.
- 7.28 Fundamentally, the location and the prominence of the site should make retail intensification an attractive development option. Should the Council wish to incentivise continued retail use, therefore, engagement should be held to this effect. The Council may also wish to consider the use of planning policy to secure this, through allocation of the site for retail use and extension of town centre and retail frontage boundaries.

Royal Sun Alliance and Station Car Park

- 7.29 There may be viability challenges with the development of these sites for residential use, whilst also retaining the existing number of car parking spaces through the development of multi-storey car parks. There are a number of potential options to address this. The most simple would be for the Council to provide public funding to meet any shortfall. However, it may be difficult to justify a business case for this, given there is no direct benefit to the Council, and there may be state aid implications.
- 7.30 One of the schemes envisaged in this report assumes alternative access is available to enable the residential development of the RSA car park, through the parcel of land to the east of the site, between the car park and New Street. This land is in the Council's ownership. There is already some form of right of access over this land held by RSA. However, this would need to be modified to enable the residential development, or preferably the land sold into the scheme. The Council therefore has a potential stake in the promotion of this site, which could form part of negotiations with RSA. It would appear, however, that values would need to rise for this to be attractive to RSA.

- 7.31 Whether or not residential development is promoted, there is also the potential for the car parking at this site to be opened up for public use. Feasibly this could be at defined times at evenings and weekends, when one would expect the car park is less well used by RSA staff. This arrangement could potentially be relatively straightforward to implement, with the agreement of RSA. Discussions would be required to agree an approach, but feasibly an agreement could be struck whereby RSA allowed public access at given times, including use of the footbridge, and in return receive income from charging for the service. This may require some upfront investment, but would not require the direct participation of or contracting with the Council. This would provide an increase in public parking, at given times, of about 350 spaces, i.e. the full extent of the existing car park.
- 7.32 As an alternative to residential development, the Council may prefer to focus on car parking at this site, not only increasing public provision by arranging for public access, but by intensifying the use by adding a deck to increase car parking spaces. To facilitate this, one would envisage an agreement whereby the Council constructed additional decked parking (through a contractor) and took a lease from RSA of the new spaces. This would leave the original spaces to be used by RSA, so it had no net loss, with public provision introduced with the new spaces. The agreement would need to provide for the construction period, perhaps through a building licence, and would need to provide for public access over common parts. Public access would also be required over the footbridge to make this a more attractive car park for users seeking to visit the town centre. This approach could provide approximately 150 public spaces on one deck.
- 7.33 The advantage of this approach would be that in theory the Council could own (via long lease) and operate the public element, and receive the income for it. The downside is that this would require significantly more upfront investment, including funding the construction cost of the deck element, as well as compensating RSA for the disruption including temporary loss of spaces and on-going sharing of the site, which may be more significant given RSA would not have the benefit of the public car parking income.
- 7.34 The Council should consider whether it wishes to prioritise housing delivery or increased public parking provision at this site. With a decision made, the Council should then liaise with RSA further regarding its preferences and potentially to negotiate potential compensation, depending on the option taken up.
- 7.35 It remains to be determined which or the parties would lead in promoting the site should an option including some form of development be preferred. Should the residential-led option be preferred, it may be possible simply to advertise that part of the site for sale, given this element is relatively straightforward residential development. Separate access would be

required to do this, and some form of planning brief or planning allocation may be useful, though not essential. The proceeds from this sale could be used to fund the car park construction separately.

- 7.36 An alternative to the RSA car park site development is the joint development of the RSA and station car parks. In order to facilitate this option, firstly engagement should be undertaken with the landowners to explore the potential for a shared car parking facility between them. This will clearly carry issues relating to securing and use, but with good management it should not be difficult to arrange.
- 7.37 One can envisage a simple division of spaces between the two uses, with the use of card access or similar for the RSA portion, or a more dynamic management regime where the share of spaces could flex in response to relative demand from RSA staff and station customers. This latter approach may allow for greater public use of the RSA spaces, effectively increasing public car parking in the town. The opportunity could also be taken to improve pedestrian links to the town centre, either through the pedestrian underpass in the station car park, or through the RSA bridge access, or both.
- 7.38 If parties would potentially be amenable to such an arrangement, then the next step beyond agreement in principle would be to establish likely car park usage, both in terms of quantum of spaces needed and the likely distribution of demand between the two groups of users at different times. This would establish the potential for dynamic use of the car parks, or otherwise that spaces would need to be permanently allocated for one use or the other. With that established, designs could then be worked up to reflect the intended use of the car park.

Areas of Focus

- 7.39 Some parts of the town centre have been identified as areas where improvements or interventions could be focussed, but where there are no clear discrete development sites at the present time. Below each are discussed in turn, including the form of future development that would be beneficial in each case as sites become available, and other non-development interventions that could be implemented.

Civic Quarter

- 7.40 The Civic Quarter has been identified as an area where office use is already well established, and where it should remain as the strategically logical location for the town centre, being situated on the fringe of the core town centre, on the railway station side.

- 7.41 Some conversion of offices to residential use has already occurred and one would anticipate that this will continue as lease terms expire in the future. It will be important to try to resist this change, in order to preserve employment use in this strategic location, and more generally in the town centre, as commercial uses provide knock-on benefits for town centre activity. The Council is limited in its ability to resist residential conversions due to the permitted development rights regime, which allows conversion without planning permission.
- 7.42 However, one issue which the Council can still consider and use to refuse conversion, if appropriate, is traffic impacts. It is therefore important that the Council has robust traffic modelling for this area, which is kept regularly updated, to provide an evidence base for any resistance to conversion applications, should there be genuine concerns.
- 7.43 The Council may also have a softer role in engaging with existing owners and occupiers of the commercial premises in this area, to understand remaining lease terms, intentions on expiry, and should an occupier be forced to relocate, the potential to retain that occupier within the town. This could take the form of direct liaison, but also through questionnaires and engagement workshops. It will be important to understand what measures may convince owners and occupiers to retain employment use and operations in the town. The Council could also engage with local business groups, including in assisting in cross-industry networking and knowledge-sharing, particularly for the businesses in the Civic Quarter, encouraging on-going participation.
- 7.44 Through the planning policy process, the Council could also seek to allocate this area as one where commercial uses take precedence, to encourage new commercial development where possible, and discourage residential conversion where a full planning application is required, and hence full planning consideration can be applied. This should encourage new, flexible workspace offerings to provide for SMEs and modern ways of working, including start-up incubator space, potentially looking favourably on the promotion of such schemes even where there is a small net loss in office floorspace.

Queen Street

- 7.45 As identified above, Queen Street is a secondary retail area, but that is entirely appropriate given its location relative to the town centre. The retail parade is diverse and includes a number of independent stores. This point of difference should be celebrated, and could be enhanced through frontage, paving and street furniture improvements.
- 7.46 Frontage improvements can be relatively straightforward to implement if funding is in place. With the agreement of occupiers and owners, something as simple as a fresh coat of paint and some new awnings can help to enhance an area's image. Building on this, through

engagement and the use of design teams it can be possible to curate a coordinated aesthetic across a whole street, using a consistent palette of colours or fonts etc. These kinds of visual enhancements can serve not only to improve appearance, but also to provide an identity to a particular area. This could be particularly useful in the case of Queen Street in establishing an identity distinct from the main town centre.

7.47 In terms of other improvements, whilst the existing street furniture is attractive in parts, it could be improved, particularly with the introduction or limited tree planting and paving improvements. The paving could be coordinated with frontage improvements to ensure aesthetic consistency. Examples of interventions similar to this are shown below.



Frontage improvements with branding at Nunhead, London



Coordinated frontage and paving improvements at Leytonstone, London

7.48 Funding for these improvements will clearly require a business case. The justification for this should make reference to the potential enhanced trade generated, and the strategic importance of establishing an identity for this area to preserve its secondary retail role into the future. It should also be possible to secure contributions to the improvements from the local owners and occupiers, using public funds to leverage private investment.

7.49 A sketch impression of how Queen Street improvements could look is given below.



River Arun Corridor

- 7.50 The River Arun Corridor represents an opportunity to open up an under-utilised asset, the River Arun, to the wider town centre.
- 7.51 The Office Outlet / Currys site has been discussed above. Moving eastwards over Worthing Road, there are some office buildings fronting onto the river, of which one is currently undergoing residential conversion. Whilst loss of office floorspace should be resisted in general, as above the Commercial Quarter is considered to be the best strategic location for offices. If new floorspace can be added here, then loss of space elsewhere is less of an issue.
- 7.52 Development of these offices should ideally take the form of comprehensive redevelopment, to make the most of the river, rather than simple conversion. Development could also contribute to enhancing the river, both through direct works and financial contributions.
- 7.53 Improvements to the river could include clearing of excess vegetation, path and cycleway improvements, and the addition of features including bridges.
- 7.54 Moving further east, into the park around the river, no development of the park itself is proposed, but there may be improvements as above. In particular, lighting improvements to cycle paths would be beneficial. Reinforcing this cycle route would help to establish this as a key route into the centre of town for cyclists, a viable alternative to the main roads. This route could also be linked through the centre of town, along existing routes by Sainsbury's to the Causeway, and up to Carfax, and on to Horsham Park via Medwin Walk (for more on Medwin Walk see below). This would require cycle path improvements through the centre of town, along Carfax. The designation of a dedicated cycle route, including separate paving and signage, would assist in this.
- 7.55 Delivering these improvements would require funding, but much could be provided through developer contributions, including CIL when implemented. There is also a range of public funding sources available for cycling-related improvements in particular, which the Council may be able to utilise.

General Improvements

- 7.56 A number of non-development interventions are identified in section 6, including wayfinding and signage, public realm, crossings and other improvements.

Wayfinding and Signage

- 7.57 Wayfinding and signage could be improved in Carfax and at Freshwater Parade / Worthing Road to improve legibility of the town centre including awareness of the locations of key anchors and the ease of walking between them. Delivery of these improvements would be relatively straightforward, requiring allocated funding from the Council and simple planning permissions. The time should be taken, however, to strategically consider which key elements of the town centre peoples' attention should be drawn to. From the preceding analysis, routes to Horsham Park are considered to be underused, and that the link across Albion Way between West Street and Freshwater Parade could be better used, so these may form a focus of the signage. The signage could also be used to highlight key heritage assets within the town centre, but at the same time communicate modern, coordinated branding for the town centre (more below).

Public Realm

- 7.58 In terms of public realm improvements, there is the potential to rejuvenate the street furniture around Carfax, and utilise new paving to emphasise the link between Piries Place and the rest of the town centre, and in the process align public realm with that around West Street for consistency. Currently there is a disjointed approach between the two areas, which adds to the impression that Carfax is somewhat secondary to West Street. The use of more modern materials, whilst still sympathetic to the historic assets in the area, would help to communicate a refreshed image for the town centre.
- 7.59 To maximise the benefits of this intervention, the Council should consider what image the town centre should project going forwards, and select materials and designs which meet it. Through consultation in preparing this report it became clear that local stakeholders wanted to retain the historic image of the town centre, but also communicate its more modern elements, including a nascent computer gaming industry, and potential to diversify and expand its night-time economy. It may be worth employing specialist place-marketing consultants as part of this exercise.
- 7.60 With an approach and designs agreed, again delivery of these elements would be relatively straightforward, though funding requirements are likely to be more significant than for signage. Clearly, a business case will be required as justification. This could focus on how public realm improvements would complement and enhance town centre marketing strategies, presenting a coherent overall message. The improvements would also, in conjunction with the Piries Place proposals, serve to reinforce the importance of Carfax as part of the town centre and mitigate any risk of this area declining in the face of new developments at the western end of

the town centre. Contributions towards these improvements could also potentially be secured from development, either through S106 payments or CIL once introduced.

7.61 Public realm improvements can also be made at Bishopric. The Council is considering options for enhancing the public realm following the recent temporary provision of tree planting at the junction with West Street. Whilst it may be helpful to maintain landmark public realm to some extent, to provide identity and improve wayfinding, this can also be achieved through more understated street furniture which is designed well, to encourage use and hence enhance visual memory of the area. Replacement public realm may potentially focus on seating to encourage dwell times in this location.

7.62 'The Bishopric survey responses confirmed the need to improve connectivity between the town centre and John Lewis at Home and Waitrose. Also businesses in the area and footfall in general would benefit from some of the existing vegetation being removed, however, overall the public are keen to retain as much soft landscaping and water features as possible. Noting all the survey responses received the Council proposes, at section 9.5, to develop and consult on a detailed scheme to improve the Bishopric public realm'

~~Further to this, the trees and shrubs currently at the end of Bishopric could be substantially reduced. Currently, this vegetation blocks views and desire lines and effectively discourages linked trips between the core shopping area and John Lewis at Home, and reduces visibility of the retail units, which may be damaging trade. In the longer term, the Council may consider replacement of the water and seating features in Bishopric for similar reasons, but this is less of a priority and could wait until these features are closer to the end of their design life. Removal of the vegetation should be relatively straightforward to implement with sufficient Council resolution.~~

Road Crossings

7.63 A number of potential opportunities are identified for new or improved crossings over Albion Way. It is acknowledged that these interventions carry potentially significant implications for traffic flow which will require detailed modelling with West Sussex County Council, and that these may be a more long term proposition for that reason.

7.64 However, the town centre could benefit significantly from improved links to Horsham Park and to Bishopric. As such it is worth continual review of the potential for these crossings with the County. Relatively lighter touch interventions could be to introduce an additional crossing over Albion Way at the northern side of the junction with Bishopric as well as to the south. This would not significantly restrict traffic flows given it would entail the addition of a crossing at an existing junction which is already traffic light controlled. It would reinforce the link between

the western side of Bishopric/Freshwater Parade and the town centre, providing an additional desire line for pedestrians.

- 7.65 The other potentially less onerous intervention is improvements to the underpass link between Horsham Park (at the Park Surgery) and Medwin Walk. Public realm at either side of the link is not of poor quality, but the underpass itself could benefit from improved lighting and general uplift e.g. railing, paving and decorative improvements. Access could also be improved with the addition of a wheelchair lift, and cycling could be encouraged if painting were added to communicate the route and cycle racks were added on the town centre side.
- 7.66 This would improve the link without disrupting traffic flow, and hence may be a deliverable intervention in the shorter term.
- 7.67 Another valuable link could be provided with the addition of a crossing at the eastern end of the pedestrianised section of East Street, over to the southern side of East Street where it meets Denne Road. Subject to highways assessments, this could feasibly comprise a relatively simple zebra crossing. The Council should investigate the potential for such a crossing by conducting appropriate studies, as this would improve links towards West Street.
- 7.68 More generally, the potential for crossing improvements over Albion Way should be under periodic review by commissioning traffic modelling. Engagement with the County should be continued to ensure that its views are well known and to keep the dialogue open. In the meantime, however, the above may be potential interventions with a greater prospect of delivery in the shorter term.
- 7.69 Whilst the retail core of the town centre functions well, enhancements around Swan Walk and Carfax could nevertheless be made, focussing on improving way finding through both enhanced signage and more coordinated (and better quality) public realm treatments. There are opportunities at Carfax to greatly improve the setting and prominence of the town's key heritage assets in creating an authentic sense of place, e.g. through reducing ad hoc business signage, ensuring consistency of high level signage, and incorporating feature lighting of heritage assets in the evenings;
- 7.70 Crossings across Albion Way should be reviewed for all the key gateways to the town centre. Currently, links between the town centre and Horsham Park are poor, which diminishes the potential mutual reinforcement between the two. There may be the potential to improve existing crossings, and/or introduce new ones. More radical options may also be available, implementing traffic management measures or realignment to Albion Way. The potential for this should be investigated; and

- 7.71 Besides the various public realm and signage improvements suggested for the town centre, other 'soft' improvements may include the provision of town centre Wi-Fi hotspots, or 'pop-up' stores. As the popularity of internet shopping continues, and as Horsham's catchment population shifts to include a greater proportion of younger residents, it is important that the town centre diversifies its role. Wi-Fi hotspots would be a relatively low cost addition which would increase dwell times. In addition, well-regarded markets are already established at Carfax and this principle could be extended to other parts of the town centre, e.g. Bishopric and to a broader range of goods, e.g. street food, bars or clothing.
- 7.72 A Delivery Schedule in Section 9 provides a summary of all the supported interventions proposed.

DRAFT

8. Conclusions

- 8.1 Horsham is performing well as a town centre within its regional context, and is viewed as an attractive market town with a good range of shops and a compact centre. However, it is important to continually review performance and assess what opportunities exist for future development, to steer the town in a desired strategic direction.
- 8.2 Horsham should look to build on its success, diversifying its image from a market town to a *modern* market town, catering for a full range of ages and incorporating the highest quality development and materials in public spaces.
- 8.3 The town is also facing a number of pressures to meet forecast requirements for housing delivery, car parking and retail floorspace, which it will be important to try to accommodate in the town centre rather than out-of-centre locations.
- 8.4 A number of development sites have been identified in this study which between them could help to meet some of these demands. Increased public car parking provision could potentially be accommodated at Office Outlet / Currys (c 25 spaces) and at the RSA Car Park (c 150 – 350 spaces, depending on development options and extent of public access). The Council is also investigating the potential to increase car parking provision at Piries Place Car Park.
- 8.5 Regarding residential development, the RSA Car Park could accommodate about 20 houses, depending on the development option pursued, and approximately 250 units could be accommodated through the redevelopment of the Forum / Sainsbury's site, though there are significant viability concerns with comprehensive redevelopment of this site .
- 8.6 There are few sites available in the town centre to accommodate significant new retail development, without resorting to increased height. In GVA's view, upwards extension of Swan Walk is unlikely to be viable. Retail intensification at Office Outlet / Currys could deliver an increase of c 1,640sqm net retail floorspace. Besides this site, the Sainsbury's site is the other major town centre opportunity. With residential-led redevelopment and re-provision of the food store, an increase of c 2,092 sqm net retail floorspace could be delivered on this site. There may be the potential, however, to increase this with a retail-led scheme as an alternative to the residential-led scheme envisaged in this report. This potential should be considered further in conjunction with feasibility to work up the first phases of this development.

- 8.7 This report also proposes a range of other interventions in the town centre, including public realm, cycle path, street furniture, public Wi-Fi and stakeholder engagement proposals. To take these to the next stage, the Council should consider availability of funding, both from internal resources, potential developer contributions, and central public funds. Some of these may be, subject to funding, relatively straightforward to implement. Others will require further feasibility investigations, particularly including traffic modelling.
- 8.8 The Council may wish to consider establishing a dedicated internal team to implement proposals contained in this report, including engagement, in order to maintain momentum. It is important to define a programme of improvements, based on realistic internal capability and funding, with clear accountability to really drive change.

DRAFT

9. Delivery Schedule

- 9.1 The Horsham Town Centre Vision has been prepared to provide a clear vision and framework to support and sustain the town centre in the light of planned residential growth; demographic change; shifting retail shopping patterns; to protect and enhance Horsham's historic environment and to take advantage of potential development and improvement opportunities. The realisation of the vision will create a more vibrant, sustainable and successful town centre that meets the needs of residents, visitors, businesses and employees.
- 9.2 Horsham District Council is committed to working in partnership with key local and statutory organisations. At a time of constraints in public and private sector funding, it will be necessary for the partners to work hard to access potential sources of external funding. The partners should be alive to funding opportunities and be prepared to respond quickly and positively. Flexibility might be required amending projects and timescales to fit with emerging funding opportunities. The promotion of projects within a comprehensive vision and framework with clearly defined outputs and benefits will assist in accessing funding.
- 9.3 Current potential funding sources include S106/S278/CIL contributions, European Union funding and Local Enterprise Partnership funding, alongside any existing District Council funding. There are also opportunities for private sector contributions towards projects where commercial benefits result.
- 9.4 Based on the public exhibition and consultation surveys conducted in May and June 2017 the following Strategic Directions and improvement projects for the town centre were supported:

Ref	Direction	Outputs
SD1	Respond to demographic change	Provide more and better leisure and retail opportunities for families and a growing younger population.
SD2	Strengthen retail and leisure, support employment growth and the economy	Provide a larger choice of town centre uses and experiences, including leisure and a range of space sizes, including flexible employment space.
SD3	Increase and diversify housing provision	Provide new, high quality housing developments to meet local needs and increase town centre visits.
SD4	Expand hotel provision	Provide a contemporary offer for business travellers, weekend tourist and family occasion visitors, with potential for both budget and a smaller up-market 'boutique' hotels with potential for a Horsham conference venue.
SD5	Support new cultural and	Provide and improve town centre cultural and

Ref	Direction	Outputs
	community infrastructure	community facilities to create more activity, improve the nighttime economy and increase sense of community. Support and diversify The Capitol's cultural offer.
SD6	Enhance access and movement	Focus on improving gateways into the town centre, make it easier to find your way around, improve the appearance of the town, improve cycling facilities, upgrade appearance of car parks and provide additional car parking to meet demand.
SD7	Evolving image and identity	Define and promote Horsham's identity as a modern market town. Encourage use of historic forms and materials; reduce blank facades and unsightly servicing and large bin storage areas.

9.5 Flowing from the directions above the town centre Vision has identified strategic development opportunities which have the potential to come forward over the vision period. The following Delivery Schedule provides a brief overview of Key Projects, linked strategies and Key stakeholders. **All schemes will need to be developed, designed, tested and refined using evidence and be subject to business cases, consultation and all relevant statutory processes:**

Delivery Schedule

Ref. No.	Project name & description	Strategic Direction Ref/Linked Strategies/Projects	Key Partners
1	Public realm strategy: Develop a 'holistic' town centre public realm strategy that addresses: <ul style="list-style-type: none"> • Character spaces • Linkages, connectivity and movement between spaces • Wayfinding and signage • Development and design guide • Public realm materials and street furniture palette • Gateways, pedestrian crossings and underpasses • Public art 	SD6, SD7 Cycling & pedestrian strategy Economic strategy 2017-2027 Tourism strategy Opportunity sites	Horsham District Council ('HDC') West Sussex County Council ('WSCC') Horsham Society Neighbourhood Councils Horsham District Cycling Forum ('HDCF') Horsham Town Community Partnership ('HTCP') Horsham Unlimited <i>Horsham in Bloom</i>
2	Walking & Cycling strategy: Develop a strategy to improve and develop cycling and pedestrian infrastructure and	SD6, SD7, SD2 Tourism strategy Sport and physical activity	WSCC Neighbourhood Councils

Ref. No.	Project name & description	Strategic Direction Ref/Linked Strategies/Projects	Key Partners
	movement within and around the town centre including making better use of the River Arun area.	strategy 2016 to 2031	HDCF Horsham Society HTCP Horsham Unlimited Horsham in Bloom
3	Promote image and identity: Develop a tourism and marketing strategy for Horsham and Town Centre including options for extending public Wi-Fi.	SD7, SD2, SD6, SD5 Economic strategy 2017-2027	HDC Neighbourhood Councils Horsham Society Horsham Unlimited HTCP Horsham Unlimited Horsham in Bloom
4	Car parking strategy: Develop a car parking strategy to address future demand, management, access, usage and appearance.	SD6, SD2, SD1, SD3, SD5 Economic strategy Tourism strategy Retail strategy	HDC Neighbourhood Councils Horsham Society HTCP Horsham Unlimited
5	Station Quarter – Develop scheme to enhance public realm between Horsham Station and town centre including subways. Explore opportunities to expand hotel provision and assess options to market Park House as a 'boutique' hotel to be considered in conjunction with development proposals in Hurst Road.	SD2, SD6, SD7 Economic strategy Public realm strategy Hotel and Visitor Accommodation Study Tourism strategy	HDC WSCC Neighbourhood Councils Horsham Society HDCF Network Rail Horsham in Bloom
6	West St/Forum link – Improve connectivity and appearance including the Blackhorse Way crossing. Blackhorse Way (1) – Develop a waste and servicing arrangements strategy to address overall management and appearance. Blackhorse Way (2) – Assess one way traffic options and develop scheme to reduce traffic flows and improving pedestrian facilities, including the West Street to Forum link, and upgrading the public realm.	SD6, SD7 Economic strategy Public realm strategy Retail strategy	HDC WSCC Neighbourhood Councils Horsham Society Horsham Unlimited HDCF HTCP Horsham in Bloom

Ref. No.	Project name & description	Strategic Direction Ref/Linked Strategies/Projects	Key Partners
7	<p>Forum/Library (1) Western area – Explore potential and develop scheme to improve use of site with a Civic hub combining library, health and advice facilities and improve links to Worthing Road/Bus station.</p> <p>Forum/Piazza (2) Southern area – Explore potential and develop scheme to partially enclose with additional retail/residential uses and improve environmental conditions.</p>	<p>SD5, SD7, SD6</p> <p>Public realm strategy</p> <p>Economic strategy</p> <p>Retail strategy</p>	<p>HDC</p> <p>WSCC</p> <p>Neighbourhood Councils</p> <p>Sainsburys</p> <p>Surgery</p> <p>CAB</p> <p>Horsham Society</p> <p>HTCF</p> <p>HTCP</p> <p>Horsham Unlimited</p> <p>Horsham in Bloom</p>
8	<p>Bishopric (1) Eastern area (Albion Way-West Street, including Springfield Rd and Worthing Rd axis): Develop a detailed scheme to improve the public realm and increase connectivity to John Lewis@Home and Waitrose.</p> <p>Bishopric (2) – Western area (Albion Way-Rushams Rd): Progress a detailed scheme to enhance public realm, western gateway and support retail function.</p>	<p>SD7, SD6, SD5, SD2</p> <p>Public realm strategy</p> <p>Economic strategy</p> <p>Retail strategy</p>	<p>HDC</p> <p>WSCC</p> <p>Neighbourhood Councils</p> <p>Horsham Society</p> <p>HDCF</p> <p>Horsham Unlimited</p> <p>Horsham in Bloom</p>
9	Town Centre – East: Progress Queen Street/Iron Bridge improvements, eastern gateway and links to East Street to include supporting retail function and area identity.	<p>SD7, SD6</p> <p>Public realm strategy</p> <p>Economic strategy</p> <p>Retail strategy</p>	<p>HDC</p> <p>WSCC</p> <p>Network Rail</p> <p>Neighbourhood Council</p> <p>Horsham Society</p> <p>Horsham in Bloom</p>
10	Horsham Station/Royal Sun Alliance car parks – Explore options and develop schemes to increase parking capacity and potential for additional residential provision and explore options for public use of car park.	<p>SD6, SD3, SD2</p> <p>Car parking strategy</p> <p>Economic strategy</p>	<p>HDC</p> <p>WSCC</p> <p>Network Rail</p> <p>Royal Sun Alliance</p> <p>Neighbourhood Councils</p>

Report to Cabinet

23rd November 2017

By the Portfolio Holder for Leisure and Culture

DECISION REQUIRED

Not Exempt for Publication



**Horsham
District
Council**

Play Strategy 2017 - 2027

Executive Summary

Horsham District Council's Play Strategy is in need of updating,

This report introduces members to the draft Play Strategy 2017- 2027 which reviews successes over the last ten years and sets the context for play provision in the district over the next ten years. The strategy identifies a vision and aims for play and details actions and projects prioritised for delivery within the term of the Strategy.

This report seeks approval for its formal adoption.

Recommendations.

Cabinet is recommended to agree and adopt the new Play Strategy 2017 – 2027, attached as Appendix 1 to this report, having noted and considered the feedback from the consultation which informed the Strategy.

Reasons for Recommendations

Some of the council's play infrastructure is aging and in need of replacement. Additionally, the Horsham District Planning Framework plans for the delivery of 16,000 new homes between 2011 and 2031 and, although pressure on public finance is unlikely to abate during this period, the framework brings opportunities to secure and deliver new play infrastructure. Given these factors, it is important that the Council has a clear vision of its play priorities and how these can be delivered.

Background Papers: Horsham District Play Strategy 2007 – 2012, Review of Previous Play Strategy

Wards affected: All

Contact: Anna Chapman, Parks and Countryside Development Officer, Horsham District Council. Anna.chapman@horsham.gov.uk, 01403 215201

Background Information

1 Introduction and Background

- 1.1 Horsham District Council's previous play strategy spanned the period 2007 to 2012 and whilst actions have been undertaken between 2012 and 2017 the strategy has not been formally updated in this period.
- 1.2 This report introduces members to the draft Horsham District Play Strategy 2017-27 and seeks approval for its formal adoption.

2 Relevant Council policy

- 2.1 The strategy is set within the context of Corporate Plan Priorities as identified on page 7 of the strategy document.

3 Details

- 3.1 The strategy has been created through dialogue with parish councils and other stakeholders and feedback from a limited on line survey. However, it is predominantly driven by:
 - the ongoing assessment of play provision within the district and forming part of the Council's estate
 - the need for up to date and well maintained facilities and opportunities that serve existing and emerging communities.
- 3.2 The strategy sets the context for play provision in the district and highlights successes over the last ten years. It identifies an overall vision and aims and details actions and priority projects to be delivered in the future.
- 3.3 Actions are grouped under 7 headings being
 - Stimulating – new or improved facilities at Council owned sites that inspire a new generation of users
 - Safety – replacement of existing play areas reaching the end of their life and repurposing of a small number of low value play areas
 - Well used – interactive mapping, improved signage and marketing of established places to play
 - Barriers – facilitation of community run events to encourage more people into our parks and reduce anti-social behaviour
 - Partnerships – introduction of an annual play seminar and partnership group on Facebook
 - Natural – improved access and new play features within woodlands and meadows
 - Performance – improved customer feedback, inspection and maintenance processes

4 Next Steps

- 4.1 Several of the actions are already in motion but if the strategy is adopted it provides a firm framework for the direction and travel and proposed future work to deliver the overall action plan.

5 Views of the Policy Development Advisory Group and Outcome of Consultations

- 5.1 The Leisure and Culture PDAG has been sighted on this draft strategy, vision and aims for a number of months and has supported the proposed key deliverables including

- Improve play for older children by replacing Horsham Skate Park with a concrete Skate park.
- Through new developments, look for opportunities to deliver a network of bike tracks across the District.
- Improve the range of play for children with disabilities.
- Regenerate Roffey Recreation Ground in North Horsham.
- Install a Rotary Club sponsored roundabout in Horsham Park.
- Maintain our renewals programme of at least 4 play areas per year.
- Improve the ability for our residents to self-serve by introducing an interactive mapping system to find local places to play.
- Support events and activities happening in our open spaces such as Junior Park Run and the activities that the Sports Development Team run like Frisbee, Skate Jam, Summer activity programme.
- Support Community policing and Church and Community Youth Worker schemes such as Purple Bus and the Snack Wagon.
- Run an annual play seminar for Parish Councils to inspire partners to think about play creatively.
- Encourage families to walk and explore by introducing features into natural spaces, such as the Riverside Walk.
- Remove litter clearance task from rangers to focus on maintenance.
- Fund more projects through external grant funding.

- 5.2 Additionally, an on line survey advertised through social media and sent to all Parish Councils was conducted in March 2017. The results of the survey can be found at the end of the Strategy attached to this report.

6 Other Courses of Action Considered but Rejected

- 6.1 Whilst it could be argued that the actions would happen with or without the strategy it is considered useful to reinforce the context for strategic decision making via an adopted strategy.

7 Resource Consequences

- 7.1 The action plan identifies where capital and revenue resources have already been identified, including use of s106 where appropriate. However, not all projects are fully costed at this stage.

8 Legal Consequences

- 8.1 There may be some legal consequences where facilities are secured through s106 before being transferred to local parishes.
- 8.3 Additionally, any repurposing of low value play areas may involve sale and transfer of land.

9 Risk Assessment

- 9.1 There is no significant change in direction as a result of this strategy but there has been concern expressed about reputational risk by some members when low value play areas have been recommended for decommissioning. No decommissioning will take place unless evidence is produced demonstrating ongoing access to other proximate facilities.
- 9.2 There is also a risk that the production of an action plan could make the Council hostage to fortune. It should be noted that many leisure related action plans, whilst setting direction of travel and priorities, still remain couched within the context of competing agendas and scarce resources. Several of the identified projects do not yet have approved funding and thus have to be considered aspirational until s106 or CIL is identified.

10 Other Considerations

- 10.1 The Council must have regard to the Public Sector Equality Duty in section 149 of the Equality Act 2010. An Equalities Impact Assessment can be found attached to this report.
- 10.2 It is the intention of this plan is to make play opportunities freely accessible to all sections of the community.
- 10.3 All new installations are designed to reduce the potential for Crime & Disorder to occur and to be durable and sustainable.



Horsham
District
Council

Play Strategy

2017 - 2027



PLAY –

What children do when
they follow their own ideas and interests
in their own way, for their own reason

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Executive Summary

Play is an essential part of every child’s life. It is vital for the enjoyment of childhood as well as social, emotional, intellectual and physical development.

The Council believes that parks, open spaces, town and village centres should allow children (ie. people under the age of 18) to move around in safety and seeks to ensure that there are appropriate spaces where children can play freely, experience nature, explore their environment and be with their friends.

There are two national agendas which reinforce the importance of play; Public Health England’s report on the prevalence of childhood obesity and Article 31 of the Convention on the Rights of the Child. The Horsham District Play Strategy 2017-2027 responds to these agendas and seeks to reconcile them within the context

of the Council’s Corporate Plan. It reflects on significant improvements to children’s play across the Horsham District since the first Council Play Strategy in 2007 and identifies the direction of travel for play in the district over the next 10 years.

In summary, the Horsham District Play Strategy 2017-2027 seeks to ensure that all children have access to spaces and facilities for play and informal recreation. It identifies 6 aims within a vision for play which will guide Council, and influence partner activity over the next ten years. It identifies actions required to achieve these aims and in doing so reinforces the Council’s key play priorities.

According to Public Health England in 2015/16 one third of 10 to 11 year olds and over one fifth of 4 to 5 year olds were overweight or obese. The World Health Organisation regards childhood obesity as one of the most serious public health challenges for the 21st century. The UK ranks 9th for overweight prevalence (including obesity) in children aged 2-19 years out of the 34 OECD countries. In 2013 local responsibility for the prevention and management of obesity transferred from Primary Care Trusts to local authorities.

Article 31 of the Convention on the Rights of the Child recognises the right of every child to rest, leisure, play recreational activities and free and full participation in cultural and artistic life. The Committee on the Rights of the Child is concerned by the poor recognition given by the Government to these rights. Rising urban populations, violence in all its forms, the commercialisation of play provision and increasing educational demands are all affecting children’s opportunity to enjoy their rights. In 2013, the committee produced a ‘General Comment’ that explains in detail measures governments are urged to take to ensure implementation of the rights in article 31 for all children.

VISION

To provide, protect and enhance a publicly accessible network of diverse and innovative play spaces that meet the needs of our communities, and have a positive impact on the health and well-being of local children.

To achieve this vision for the Horsham District, the following aims have been identified:



Aim 1 Improve the public realm as a child friendly environment which offers stimulating and challenging play opportunities



Aim 2 Ensure our play spaces are clean, safe and non-threatening



Aim 3 Encourage local people to use our play spaces to benefit their health and wellbeing



Aim 4 Work to reduce the barriers that prevent children from accessing and playing in the general public domain



Aim 5 Work with partners to identify opportunities for improving places for children and young people to play



Aim 6 Encourage children and young people to encounter the natural environment



Aim 7 Deliver excellent value and high performance while keeping the customer at the heart of what we do

Our successes in the past 10 years

- Creating a destination park at Dinosaur Island, Southwater Country Park, which people travel to from outside of the Horsham District.
- The first wheelchair swing in a public park in the Horsham District.
- Introducing electronic play equipment at Kilnwood.
- Lifting the cycling ban in Horsham Park.
- More park based activities in the holidays.
- Introducing more challenging play spaces for older children to play.
- Providing more open access ball courts.
- Removing the need for fences in appropriate locations.
- Starting a renewals programme aimed at replacing four play areas per year.

1. The strategy in context

1.1 Introduction

The Play Strategy and Action Plan for Horsham District 2017-2027 is a 10 year plan that has been developed by Horsham District Council. It picks up on the outcomes of the previous 5 year plan which covered the period from 2007-2012. The principles of the 2007-2012 strategy have continued to be delivered to the present day.

The Play Strategy and Action Plan creates a set of guidelines and priorities in the provision of outdoor play and aims to be a practical tool for relevant people to use and refer to whenever issues concerning play become prevalent.

The Play Strategy and Action Plan is encompassing to most aspects of outdoor play in children's and young people's lives. It can be used as a framework for good practice by individuals, statutory bodies, voluntary sector organisations or anyone else with an interest in the development of play and play services.

Whilst it is accepted that private fee charging play provision has a role within the community, the aim of the Play Strategy and Action Plan for Horsham District is to ensure that wherever they live or spend the majority of their free time, children and young people should have access to spaces and facilities for play and informal recreation, which meet the three free's test and as such:

Are **free** of charge, where they are **free** to come and go and **free** to choose what they do whilst there

Horsham District Council shares the view of the Children's Play Council that the primary aim of investment in and support for play, should be to increase the numbers and frequency of children and young people, from all social groups, playing freely in their local neighbourhood.

1.2 Review of previous Play Strategy 2007 to 2012

The previous Horsham District Play Strategy was developed in response to the national Children's Play Initiative which aimed to create, improve and develop inclusive play provision across England that responds to the needs of the community.





The strategy was instrumental in achieving a successful bid for Big Lottery funds of £213,378 which delivered six key projects across the Horsham District, including the mobile street sports worker, part of Southwater Country Park play area, more adventurous play spaces for older children at Sullington, Ashington and Broadbridge Heath and a new ball court at Pixies Hollow, Horsham.

The strategy also played a key role in a successful bid for Playbuilder funding in 2009, which resulted in further improved play areas at Station Road Gardens,

Billingshurst, Beech Road, Horsham, Pixie's Hollow (Woodstock Close, Horsham) and Memorial Playing Field Steyning.

The principles of the Play Strategy continue to be implemented and further improvements to our play offering were incorporated into the Horsham District Green Space Strategy 2013 to 2023. These improvements included securing an increased annual revenue budget to enable us to replace every Horsham District Council owned play area at least every 15 years. It is also included a vision to develop Southwater Country Park

play area into a destination play area and resulted in the development of the incredibly popular Dinosaur Island.

The Play Strategy was developed by the District Council and has most influence on District Council owned spaces. The intention was that the Parish Council's would also use it as inspirational guidance to encourage improvement in play spaces across the Horsham District.

In 2017 an online survey attracted responses from residents in Horsham, Ashington, Shipley, Nuthurst, Storrington, Coolham, Southwater, Billingshurst, Warnham, Five Oaks, West Chiltington, Rudgwick, Pulborough, Upper Beeding, Steyning and Maplehurst. The majority of responses came from people with responsibility for children in the 0-10 age group.

A summary of the feedback is available as a separate document and some of the priorities in the action plan were guided by this feedback. These include:

- Significant improvements are needed at Roffey Recreation Ground, North Horsham play areas and rural play areas
- Consider the introduction of splash parks
- More information is needed on where good play spaces are
- Anti-social behaviour issues were identified at some specific sites
- Continue to provide challenging equipment for older children
- Speed up the improvement and maintenance programme on existing play areas
- More natural play features in woodlands and local greens

1.3 The national context

There are two main national and international agendas which continue to reinforce the importance of maintaining a Horsham District Play Strategy. These are Public Health England's report on the prevalence of childhood obesity and Article 31 of the Convention on the Rights of the Child.

According to Public Health England in 2015/16 one third of 10 to 11 year olds and over one fifth of 4 to 5 year olds were overweight or obese. The World Health Organisation regards childhood obesity as one of the most serious public health challenges for the 21st century. The UK ranks 9th for overweight prevalence (including obesity) in children aged 2-19 years out of the 34 OECD (Organisation for Economic Cooperation and Development) countries. In 2013 local responsibility for the prevention and management of obesity transferred from Primary Care Trusts to local authorities.

Article 31 of the Convention on the Rights of the Child recognises the right of every child to rest, leisure, play recreational activities and free and full participation in cultural and artistic life. The Committee on the Rights of the Child is concerned by the poor recognition given by the Government to these rights. Rising urban populations, violence in all its forms, the commercialisation of play provision and increasing educational demands are all affecting children's opportunity to enjoy their rights. In 2013, the committee produced a 'General Comment' that explains in detail measures governments are urged to take to ensure implementation of the rights in article 31 for all children.

The continued delivery of conducive, local, places to walk, play and be freely active is a major element of the agenda to tackle both these significant issues.

1.4. The local context

All Council activities are ultimately driven by the Corporate Plan and the desire to enhance and protect the quality of life for our residents and visitors. The table opposite highlights how the play strategy aligns with these priorities.



Corporate Plan Priorities 2016-19

The Play Strategy helps to translate the following strands of the Corporate Plan.

Communities – support our communities

Supports the reduction of anti-social behaviour

The provision of free play spaces, ball courts, skate parks, outdoor gyms, walks contributes towards improved health outcomes

Improve quality of life for vulnerable people

Economy – Improve and support the local economy

The provision of good quality play facilities in parks close to town centre locations encourages families to stay for longer and in turn boosts the local economy.

Horsham Park play area and Southwater's Dinosaur Island are destination parks which means that people travel from outside of our District to visit them, therefore boosting the local economy.

Plans to renew Horsham skate park and improve Horsham Park play area play a role in the master plan for Hurst Road and Horsham town centre

Efficiency – Great value services

Continue to pursue best value delivery of the service, through re-alignment of staffing.

Continued effort to access external grant funding and utilise developer contributions.

We work closely with volunteer and friends groups and therefore benefit from a volunteer workforce and access to a wider range of funding options.

Continue to develop a clear and transparent rationalisation and repurposing programme for surplus play areas.

Continue to evaluate and update a programme of prioritised investment in new and existing play areas and to ensure that investment is in high value play facilities, not in maintaining low value play facilities.

Continue to work in partnership with parish councils, schools, clubs and societies to advise on design and signpost to funding to improve facilities across the District.

Environmental – manage our natural and built environment

Ensure sustainable materials are used in new projects

Continue to look for opportunities to provide new play equipment that can be used by children with disabilities.

Ensure that key play environments are delivering effective play environments which enable children with disabilities to play too.

2. Current provision

Whilst responsibility for green spaces across the District lies with a number of organisations, Horsham District Council owns and manages over 400 hectares spread across a similar number of sites.

This includes 53 play areas plus recreation grounds, woodlands, allotments, cemeteries, green corridors and a number of strategic green spaces including Southwater Country Park and Chesworth Farm, Warnham Local Nature Reserve and Horsham Park.

Local Parish Councils and Housing Associations maintain most green spaces in their local areas but there are a few green spaces maintained by management companies.

West Sussex County Council maintains most grass and trees on roadside verges.



3. Strategy

VISION

To provide, protect and enhance a publicly accessible network of diverse and innovative play spaces that meet the needs of our communities, and have a positive impact on the health and well-being of local children.

To achieve this vision for the Horsham District, the following aims have been identified:



Aim 1 Improve the public realm as a child friendly environment which offers stimulating and challenging play opportunities.



Aim 2 Ensure our play spaces are clean, safe and non-threatening.



Aim 3 Encourage local people to use our play spaces to benefit their health and wellbeing.



Aim 4 Work to reduce the barriers that prevent children from accessing and playing in the general public domain.



Aim 5 Work with partners to identify opportunities for improving places for children and young people to play.



Aim 6 Encourage children and young people to encounter the natural environment



Aim 7 Deliver excellent value and high performance while keeping the customer at the heart of what we do

These aims are described in more detail below and will be achieved through the delivery of the Action Plan.



STIMULATING



SAFETY



USAGE



BARRIERS



PARTNERS



NATURE



PERFORMANCE

Aim 1: Improve the public realm as a child friendly environment which offers stimulating and challenging play opportunities.

PRINCIPLES

Play is what children do when they follow their own ideas and interests in their own way for their own reasons. Article 31 of the Convention on the Rights of the Child identifies 'play' as an essential part of every child's life. It is vital for their enjoyment of childhood as well as social, emotional, intellectual, health and physical development.

Continue to integrate play spaces into a wider landscape setting to maximise play experience and provide opportunity for community cohesion.

Continue to improve existing local and neighbourhood play spaces and ensure there is a good range of equipment for all age categories including under fives.

Work with Parish Councils to develop a network of destination play spaces (ones which people will travel to) to boost local economy.

- We will seek to identify opportunities and funding for improvement of existing play spaces in each of the larger villages.

Work with partners to improve play environments for children with disabilities to play too at key neighbourhood play areas.

- More specifically we will expand the offering at Horsham Park to include a wheelchair accessible roundabout, a sand table and sensory sound objects and identify funding for a wheelchair

swing at Dinosaur Island along with interactive electronic dinosaur sounds. We will identify opportunities to select equipment which is accessible for the widest range of abilities at other play areas.

Influence the provision of new innovative play spaces within new developments by having early involvement in strategic planning through review of neighbourhood plans and by being a key consultee in the planning application process.

- Look for opportunities to incorporate more challenging features such as bike tracks, climbing boulders and electronic play.
- Ensure play spaces on larger developments include play features for children with disabilities.
- Play should be an essential part of green space provision and opportunities should be sought to incorporate small incidental natural play features near people's houses and in woodland areas to encourage active walks.
- Buffer zones to play spaces and leisure activities should be regarded as absolute minimum design criteria.
- Support the design of home zones, traffic calming and cycle ways.
- Ensure play facilities are delivered in a timely manner.

Improve opportunities for older children to play in the public realm to improve their social, physical and mental wellbeing.

- Replace Horsham Skate Park with a concrete skate park within the next five years.
- Identify opportunities to deliver a network of bike tracks across the District, to include facilities for children to practice riding on challenging surfaces for BMX and mountain bikes.

- Identify opportunities to deliver a network of free access ball courts across the District.
- Create places for older children to hang out and chat in appropriate locations where they will feel safe and not been to seen to be intimidating local residents. This could be in the form of standalone nest swings, informal seating, youth shelters.
- Introduce more climbing boulders outside of play areas which allow young people to use without intimidating younger children or adults.
- Use the findings of the Sports Pitch Strategy to align the provision of grass pitches and development of opportunities for 3G pitches within new developments.
- Support the provision of outdoor gym equipment which is appropriate for children aged 14+.
- Work with Parkour UK to investigate the provision of opportunities for Parkour training.





STIMULATING



SAFETY



USAGE



BARRIERS



PARTNERS



NATURE



PERFORMANCE



Aim 2 – Ensure our play spaces are clean, safe and non-threatening.

PRINCIPLES

Risk taking is an essential feature of children's play; children and young people both need and want to take risks in order to explore limits and develop their capabilities.

Ensuring that all children and young people have access to stimulating and challenging play environments where they can take acceptable levels of risk, but where they are not exposed to unavoidable risks of death or serious injury is very important.

It is the Council's legal responsibility to manage its land in a way that protects users from harm or accident. Both Common Law and Statute Law relating to public safety have a significant impact on the way the Council needs to manage its play spaces.

Continue to abide by the Play Safety Forum's statement which states that children need and want to take risks when they play.

- Provide challenging play opportunities for all age ranges which meets the latest EN standards for children's play, sport and climbing.

Manage the chances of accidents occurring by carrying our regular recorded inspections on all children's play facilities.

- Manage the risk of equipment failure and unexpected financial outlay.
- We will continue to aim to replace four District Council owned play areas per year which would result in all play areas being replaced every 15 years. Given that the estimated design life of a play area is 10-12 years we will need to ensure that towards the end of their lifetime, these play areas are monitored more closely.

- Seek to reduce a few of the small, low value play areas which are in close proximity to other play spaces and focus on improving larger neighbourhood play areas.

Improve rate of maintenance on children's play areas by introducing a Service Level Agreement which will formalise targets for replacing broken play equipment.

Introduce standardised signage on broken equipment which identifies a 'time to fix'.

Ensure all play areas have the correct signage, which identifies the owner of the site and the rules around using the site.

Minimise use of chemicals on play areas and use alternative control measures wherever possible.

Consider the importance of specifying galvanised steel legs on play items which have a greater risk of serious injury.



STIMULATING



SAFETY



USAGE



BARRIERS



PARTNERS



NATURE



PERFORMANCE

Aim 3 – Encourage local people to use our play spaces to benefit their health and wellbeing.

PRINCIPLES

According to Public Health England in 2015/16 one third of 10 to 11 year olds and over one fifth of 4 to 5 year olds were overweight or obese. The World Health Organisation regards childhood obesity as one of the most serious public health challenges for the 21st century. The UK ranks 9th for overweight prevalence (including obesity) in children aged 2-19 years out of the 34 OECD (Organisation for Economic Cooperation and Development) countries. In 2013 local responsibility for the prevention and management of obesity transferred from Primary Care Trusts to local authorities.

Improve information on the Council website to allow people to find out where they can take children to play locally.

- Introduce an interactive mapping system to enable parents and carers to identify places to play and walk.
- Feature recently upgraded play areas on the Council’s website.

Make more use of social media to publicise the latest improvements to play areas.

Provide more welcoming signage on our public open spaces and woodlands to encourage people to use them to benefit their health and wellbeing.

Work in partnership with Sports Development team and local sports and church groups to encourage the delivery of park based activity sessions for children and young people to improve their activity levels.





STIMULATING



SAFETY



USAGE



BARRIERS



PARTNERS



NATURE



PERFORMANCE

Aim 4 – Work to reduce the barriers that prevent children from accessing and playing in the general public domain

PRINCIPLES

Children and young people commonly identify many barriers to play and their enjoyment of public space. These include fears for their safety, especially from bullying; being told off by adults for playing outdoors and fear of traffic.

Parents and the wider community strongly believe that children today have fewer opportunities to play than they did as children and are spending too much time watching television and using computers.

Encourage and support the provision of youth workers, community coaches and enforcement teams in parks and open spaces, subject to available resources.

Support more community run events to encourage more use of local spaces.

Encourage ownership and involvement in local play spaces through friends groups, local action teams, schools and parents groups.

Support and promote safe routes to schools and cycle ways.

Support proposals for home zones and traffic calming within new developments.





Aim 5 – Work with partners to identify opportunities for improving places for children and young people to play

PRINCIPLES

The district council directly provides a wide range of facilities for children’s and young people’s play and informal recreation. It also actively supports partner organisations from the public, private and voluntary sectors in providing and enhancing play opportunities for children and young people.

Investigate the initiation of an annual play seminar to bring together partners and Parish Councils to disseminate best practice and identify opportunities for partnership working.

Introduce a play partnership group on facebook which provides a forum for partners who work with children and young people to influence the development of better places to play.

Support community groups to become self- sustaining.

Actively promote good design principles to Parish and Neighbourhood Councils and work with them to help design better places to play.





STIMULATING



SAFETY



USAGE



BARRIERS



PARTNERS



NATURE



PERFORMANCE



Aim 6 – Encourage children and young people to encounter the natural environment

PRINCIPLES

Studies from around the world show that regular unstructured play in a natural environment produces significant improvements in learning ability, creativity, mental psychological and emotional wellbeing.

Encourage more families to interact with nature by developing a Family Discovery Hub at Warnham Local Nature Reserve.

Introduce more incidental and natural play features in woodlands and meadows to encourage usage of woodland and meadow areas.

Work in partnership with Horsham Town Community Partnership to encourage more people to use the Riverside Walk to increase their activity levels.

Investigate the provision of more features along the walk which will encourage families to explore more.



STIMULATING



SAFETY



USAGE



BARRIERS



PARTNERS



NATURE



PERFORMANCE

Aim 7 – Deliver excellent value and high performance while keeping the customer at the heart of what we do

PRINCIPLES

At the time of writing in 2017, the Government continues to impose unprecedented restriction in public sector spending. This means we have to continually review our ambitions and priorities; options for delivering services in different ways such as outsourcing or sharing; ways of raising income; grant funding; rationalising our services and ensuring the council gets the best possible deal when procuring services.

We must do this whilst being aware that reduced maintenance can lead to anti-social behaviour which can be costly to address and adversely affects quality of life for local residents.

Ensure an annual programme of revenue works (ie. repairs, renewals, clean ups) is developed and approved before each new financial year.

Proactively look for opportunities for external grant funding to support the improvement of existing facilities.

Introduce further efficiencies into the Play Ranger service which removes the low skilled litter clearance element of their job and focuses their attention on the more highly skilled play inspection and maintenance role.

Ensure a regular redecoration programme is carried out on all play areas.

Initiate a customer survey form which allows parents and carers to feedback on any issues.

Consider where appropriate, the removal of fencing which is costly to install and maintain.



Aim 1 – Improve the public realm as a child friendly environment which offers stimulating and challenging play opportunities



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Ref	Action	Funding Implications	Funding Status	Total cost estimate	External grant fund estimate	S106 cost estimate	Capital cost estimate	Revenue cost estimate	Timescale
1.1	Improve Roffey Rec Play Area	S106/ capital	Approved	£100,000		£38,229	£61,771		2018
1.2	Improve Horsham Park Play Area	S106/ capital	To be approved	£125,000		£75,000	£25,000	£25,000	2019
1.3	Install wheelchair accessible roundabout in Horsham Park Play Area.	Rotary Club	Approved	£11,500	£9,000			£2,500	2017
1.4	Install a sand table and sensory sound objects in Horsham Park Play Area.	Disability funding	To be approved	£10,000	£10,000				2019
1.5	Install a wheelchair swing at Dinosaur Island, Southwater, subject to funding.	Crowd fund	To be approved	£13,000	£13,000				2020
1.6	Install interactive dinosaur sounds at Dinosaur island, Southwater.	One off revenue	Approved	£2,000				£2,000	2019
1.7	Replace Horsham Skate Park with a concrete Skate Park	Consultation required	To be approved	£250,000		£100,000	£150,000		2019
1.8	Deliver a mountain bike skills track to the north of Horsham	Developer funded	To be approved						2022
1.9	Create places for older children to hang out, outside of traditional play areas	Annual revenue	Approved	£2,000				£2,000	2020-2027
1.10	Provide outdoor gym equipment	S106	Majority approved	£42,500		£42,500			2017
1.11	Investigate provision of a Parkour training facility	None	TBC						2018

Aim 2 – Ensure our play spaces are clean, safe and non-threatening



Ref	Action	Funding Implications	Funding Status	Total cost estimate	External cost estimate	S106 cost estimate	Capital cost estimate	Revenue cost estimate	Timescale
2.1	Replace four play areas per year	Existing annual revenue	Approved	£75,000	£75,000			£75,000	2017-2027
2.2	Repurpose small low value play areas	Capital	TBC						2017-2027
2.3	Introduce SLA to improve rate of maintenance	None							2018
2.4	Introduce standard 'time to fix' signage on broken equipment	None							2018
2.5	Introduce standard for footings on play equipment that has a greater risk of injury	None							2018

Aim 3 – Encourage local people to use our play spaces to benefit their health and wellbeing



Ref	Action	Funding Implications	Funding Status	Total cost estimate	External cost estimate	S106 cost estimate	Capital cost estimate	Revenue cost estimate	Timescale
3.1	Introduce an interactive mapping system to identify places to play	None							2018
3.2	Feature new play areas on social media	None							2017-2027
3.3	New welcoming signage on play spaces and woodlands	Existing annual revenue	Approved	£1,000				£1,000	2017-2027
3.4	Encourage park based activity sessions	None							2017-2027

Aim 4 – Work to reduce the barriers that prevent children from accessing and playing in the general public domain



Ref	Action	Funding Implications	Funding Status	Total cost estimate	External cost estimate	S106 cost estimate	Capital cost estimate	Revenue cost estimate	Timescale
4.1	Encourage and support the provision of youth workers and enforcement teams in open spaces.	None							2017-2027
4.2	Support more community run events to encourage more use of local spaces.	None							2017-2027

Aim 5 – Work with partners to identify opportunities for improving places for children and young people to play



Ref	Action	Funding Implications	Funding Status	Total cost estimate	External cost estimate	S106 cost estimate	Capital cost estimate	Revenue cost estimate	Timescale
5.1	Introduce an annual play seminar	Existing annual revenue	Approved	£200				£200	2019-2027
5.2	Create a play partnership group on facebook	None							2018

Aim 6 – Encourage children and young people to encounter the natural environment



Ref	Action	Funding Implications	Funding Status	Total cost estimate	External cost estimate	S106 cost estimate	Capital cost estimate	Revenue cost estimate	Timescale
6.1	New family discovery hub at Warnham, dependant on funding	Heritage Lottery Bid	To be approved	£250,000	£250,000				2019
6.2	Introduce new play features in woodlands, meadows and Riverside Walk	Existing annual revenue	Approved					£2,000	2020-2027

Aim 7 – Deliver excellent value and high performance while keeping the customer at the heart of what we do



Ref	Action	Funding Implications	Funding Status	Total cost estimate	External cost estimate	S106 cost estimate	Capital cost estimate	Revenue cost estimate	Timescale
7.1	Annual programme of repairs and maintenance on play areas.	Existing annual revenue	Approved	£28,530				£28,530	2017-2027
7.2	Improve ranger service to focus on improved maintenance	TBC							2017
7.3	Initiate a customer feedback process	None							2018
7.4	Consider removal of fencing where appropriate	None							2017-2027

4. Governance, Monitoring, Evaluation and Review

Progress against actions identified in this strategy will be monitored by the Head of Culture and Communities and reported annually to the Council via the Portfolio holder for Arts, Heritage and Leisure.

The strategy will be formally reviewed and updated every five years.

5. Equality and Diversity

It is recognised that equal opportunity requires targeted action and the intention of this plan is to make play opportunities accessible to all sections of the community.

The strategy will support the setting of targets for identified groups and recommend that plans and programmes are developed in consultation with group representatives.

6. Resourcing the Strategy

Staff resources

We will introduce further efficiencies into the Play Ranger service which removes the low skilled litter clearance element of their job and focuses their attention on the more highly skilled play inspection and maintenance role.

The resulting staff resource for children's play projects, inspection, maintenance and repairs will be as follows:

Inspections and maintenance	2 FTE
Management including projects	0.8 FTE

Annual revenue budget

It is important to maintain a regular repairs and renewals budget in order to manage the risk of equipment failure and unexpected financial outlay.

Repairs and maintenance	£28,530
Renewals	£75,000

Commuted sum contributions

The Council is in receipt of commuted sums which currently cover the maintenance cost for the following sites:

Forge Way play area, Billingshurst	£12,747
Parsonage Farm/Deer Park, Henfield	£66,657
Hornets play area, Horsham	£7,100
Deer Way open space, Horsham	£67,717
Oaklands open space, Horsham	£18,879
Highwood play area/open space, Horsham	£50,000

These sums are allocated over a 20 year period.

Capital requests

There will be the occasional need for Capital requests to support larger projects for which we may have secured either S106 contributions or grant funding.

Grant funding

From 2007 to 2017, the following grant funding has been received towards play:

2009 Pixies Hollow Ball Court - Big Lottery	£20k
2010 Beech Road Play Area - Playbuilder	£50k
2011 Human Nature Garden - Big Lottery	£100k
2011 Pixies Hollow Play - Playbuilder	£10k
2011 Meadowside, Storrington - Big Lottery	£45k
2016 New Street Green - Tesco Bags	£8k
2016 New Street Green - DCLG Pocket Parks	£15k

S106 contributions

The following S106 contributions have been earmarked or spent towards improved play facilities:

2015 Dinosaur Island	£101k
2016/17 Manor Fields	£26k
2017/18 Roffey Rec	£38k
2017/18 Redkilyn	£49k
2018/19 Horsham Park	£53k

We will continue to work to identify S106 contributions for relevant projects.

Note on CIL

It is currently uncertain how the implementation of the Community Infrastructure Levy will impact on the availability of developer funds for infrastructure improvements. This will continue to be reviewed.

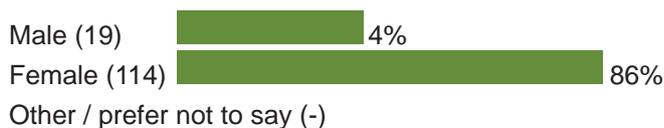
Review of the previous Play Strategy 2007 to 2012

The following summarises the changes that were made, provides an analysis on how people perceive the improvements and a summary of comments received:

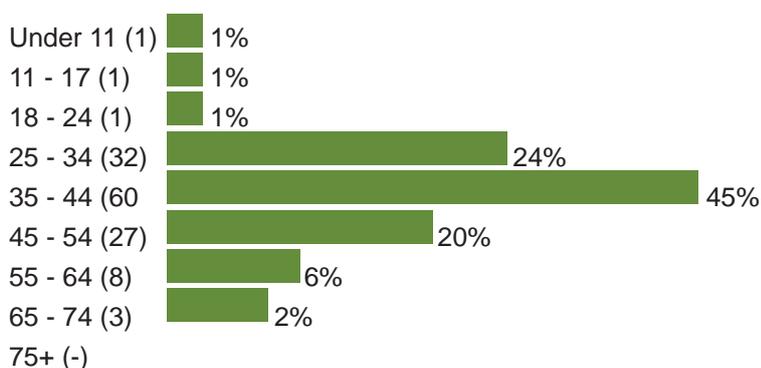
If you are responsible (ie. parent, grandparent, carer, teacher) for any children, please specify which age groups:



What is your gender?



Which age group do you fall into:



Objective 1

Improve the public realm as a child friendly environment, aiming to make parks, thoroughfares, housing estates and other public spaces within the District as conducive to play as possible.

A play standard was adopted which has helped to ensure that new and refurbished play areas are built to provide the best play value within the space available. The play standard puts a value on landscape and sensory features as well as challenge, inclusivity, accessibility, maintenance and safety.

Our flagship play project – Dinosaur Island was developed during the period of the Play Strategy and delivered in 2015. The combination of mounds and swales with wooden structures and prehistoric planting has proved an incredibly popular choice with families who visit time and time again.

We have introduced more accessible play equipment into our play areas and have introduced the first open access wheelchair swing in the Horsham District.

More skate parks have been installed around the District and a move has been made towards concrete skate parks which are easier to maintain. No new bike tracks have been delivered within the period of the strategy; however there are now plans in place for couple of bike tracks within new developments.

A number of play areas now feature pieces that can be used by older

Objective 1

Cont/d

children including electronic play, climbing volcano, aerial walkway, nest swings.

More play areas have been created using wood such as Robinia which offers texture, pattern and organic shapes. More play areas include wildflower planting and trees.

We have been working closely with developers to ensure that new play areas meet the required quantity, quality and accessibility standards. This has resulted in the delivery of much higher quality play areas which are more conducive to play in.

It is quite a time consuming process but we feel that the effort put in pays off in the quality of the play areas delivered and the ability of the space to enhance community cohesion.

Examples – Wheelchair swing

Examples - MUGA's – Southwater

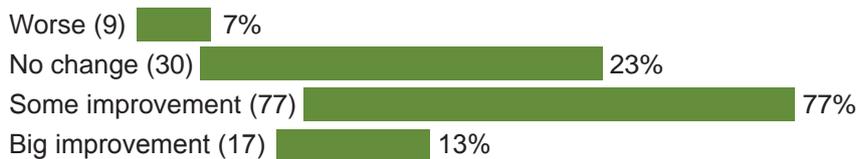
Examples – Henfield Skate Park

Examples – Beech Glade (North Horsham), Wordsworth Place (North Horsham), Butterfly garden (Southwater), Dinosaur Island (Southwater)

Examples – West of Horsham, Kilnwood

Survey Response:

Over the last 10 years have you noticed access to better play spaces for children aged 0 - 17 in the Horsham district?



The survey showed that provision of better places to play is the area of most improvement with over 40% of responders recognising Dinosaur Island, Southwater Country Park as a good example of play provision. Improvements at Horsham Park, Butterfly Garden, Southwater and Dutchells Copse, Horsham were also recognised as well as the new wheelchair swing in Horsham Park.

The survey identified the improvement of the play area at Roffey Rec (Horsham) as the

top priority, which aligns with the Council's top priority, along with the improvement of play areas in the North Horsham housing estates and play areas in the rural parts of the District. Other areas for improvement identified by more than one person in the survey were the Horsham Neighbourhood play areas including Bluebell Park, Owlbeech Play Area, Bennetts Field, Victory Rec, Horsham Park skate park and Wickhurst Green (Broadbridge Heath).

Responders noted some deficiencies including more improvements needed for children with disabilities and a lack of splash parks in the District, also a need for 3G pitches.

Parking charges were identified as a limiting factor for some people visiting certain parks.

Objective 2

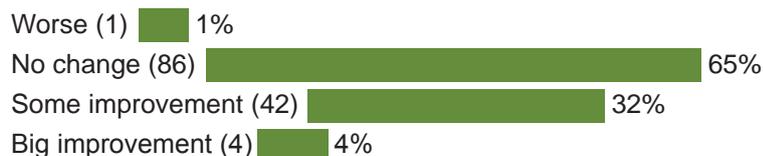
Improve awareness of places to play

A District wide play leaflet was created and is available online. More innovative signage has been installed.

Unfortunately it was not possible to deliver the web based mapping system to identify local play spaces due to a lack of resources.

Survey Response:

Over the last 10 years have we improved signposting to our spaces to play through social media, signage and publicity?



It was clear from the survey results that more should be done to publicise places where we have improved opportunities for children to play. The increased usage of social media makes this a more achievable objective for the future.

We should also have clear, accessible guidance on good places to play and ensure that families of children with disabilities know where the most conducive places to play are.

Opportunities to link up with the Youth Information Service and the Children and Family Centres were also recommended.

Objective 3

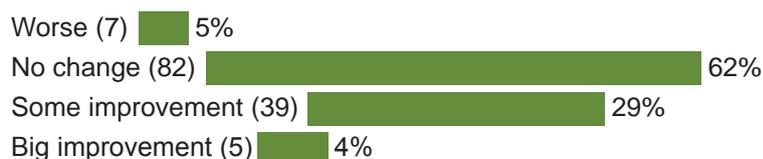
Develop a joined up approach to the distribution of play resources across the District

The Play Forum bought together partners from different organisations across the District such as WSCC, Springboard Project, Youth Council, playgroups to discuss improvements in play opportunities. It was maintained for several years, and then disbanded. No progress was made on working with the Extended Schools initiative.

A play officer's forum has since been developed which brings together officers from across East and West Sussex to share best practice with regard to design, procurement and health and safety.

Survey Response:

Over the last 10 years, have we made more connections with partners to help deliver improved opportunities for children to play?



People were unclear on how to answer this question, but sited Dinosaur Island and High Places at the Pavilions as good examples of partnership working. Opportunities to work more closely with Children and Family Centres, Happy Scamps, Forest Schools amongst others were identified.

Objective 4

Work to reduce the barriers that prevent children from accessing and playing in the general public domain

We worked with street scene wardens to target problem parks and the Youth Support Team who targeted Horsham Park over the Summer periods. The Snack Wagon also worked in key parks and open spaces across the District. Sports Development Officers have been providing more activities in Horsham Park over the Summer.

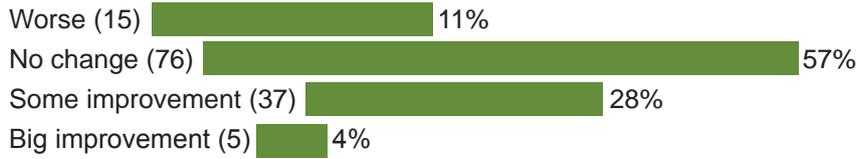
Ongoing momentum is applied to encourage new developers to consider local areas for play, safe routes to school and cycle ways.

Cycling has now been permitted in Horsham Park, allowing more children to cycle using a safer route.

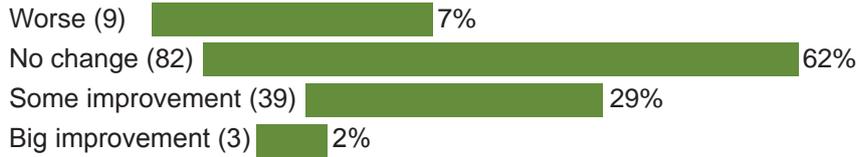
Whenever play area projects are carried out we encourage local ownership of the design of the play area to engage with local people to take an interest in their open space. This has proved to be very successful and there have been limited incidents of anti-social behaviour around newly refurbished parks and play areas.

Survey Response:

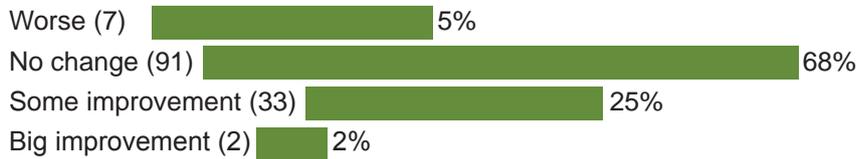
Over the last 10 years have we helped to reduce barriers to play such as: (Fear of gangs)



Over the last 10 years have we helped to reduce barriers to play such as: (Fear of traffic)



Over the last 10 years have we helped to reduce barriers to play such as: (Angry neighbours)



Although a large proportion of responders noted no change in barriers, a significant number of people have noticed an improvement including improvements in Horsham town centre. Particular areas such as Chesworth Farm, Riverside Walk and Rookwood Golf Course were identified as being good for family walks.

A number of play areas were identified as having anti-social behaviour issues including the play area adjacent to Southwater Leisure Centre, Horsham Skate Park, Littlehaven Lane and Roffey Recreation Ground. In response to this, both Roffey Rec play area and the Southwater Leisure Centre play area are due to be renewed in the short term.

Objective 5

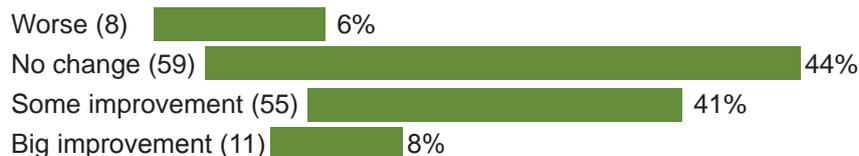
Aim to offer all children and young people the chance to encounter acceptable risks in stimulating and challenging play environments

More challenging equipment has been provided in children's play areas such as a climbing volcano, aerial walkway, zip wires.

More flexibility has been applied to the proximity of water within risk assessment criteria. Fencing of play areas has been relaxed in appropriate areas to enable more incidental use of play spaces.

Survey Response:

Over the last 10 years have we increased the chance for children to encounter acceptable risks within stimulating and challenging environments?



A significant number of people have noticed an improvement in more challenging play features. Dinosaur Island, which includes a climbing volcano and aerial walkway featured quite highly, along with Horsham Park, zip wires, Beech Glade Adventure Play Area (Horsham) and Dutchells green (Horsham) play features. High Places ropes course was also mentioned by a significant number of people, however is not a free facility.

People would like to see more incidental play in woodlands and further more challenging equipment.

Objective 6

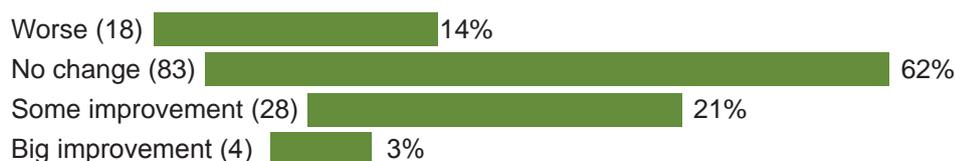
To allow the opportunity for children and young people to have their say in play and youth provision, therefore building community cohesion across the age groups.

We developed a generic email address freeplayzone@horsham.gov.uk and published the child friendly charter for play.

We consulted with residents local to all the play areas that we have made improvements at and where possible have worked with local schools to talk to the children themselves, to help give them a sense of ownership.

Survey Response:

Over the last 10 years have we talked through enough with children and families/carers and are you aware of how important we think play is?



Our level of consultation has mainly been in discrete areas according to the location of renewals.

It was recommended that we use social media more to inform parents of improvements. We should also ensure that the social media links are reaching rural communities.

What improvements could we make to opportunities for children to play feely in the next 10 years?

Lots of ideas were submitted on potential improvements. The most significant was to speed up the improvement and maintenance programme for existing children's play areas.

Other significant responses were to introduce more natural and imaginative play features in woodlands like the features provided

at Dutchells Copse green, to create water splash parks, to improve the ability for children with disabilities to play too, provide more for the under five's and the older children, better access to toilets, more larger adventure play areas and better community policing.

Equality Impact Assessment (Horsham District Council) – Policy/Procedure/Strategy/Function template

Please fill in as many of the boxes as possible (on Microsoft Word or preferred format if you have a disability which means you cannot use Word) and be aware that written information/evidence may be asked for, to back your comments. If you need further assistance or training on filling this template, please contact the Human Resources team.

Names of Team members (min of 2 – Author, manager and or staff member/equality lead) and Lead Officer/Director	Anna Chapman Adam Chalmers
Consultation mechanism (names of equality groups liaised with)i.e. Access Forum, Staff Group	Consultation with local user group
Date Equality Impact Assessment submitted to ratifying committee	Cabinet Meeting 23 rd Nov, 17
Are there resource implications to deliver actions from this EIA? If yes, please detail	No
Name of policy/strategy	Horsham District Play Strategy 2017-2027
Aim of policy/strategy (maximum 100 words)	<p>Play is an essential part of every child’s life. It is vital for the enjoyment of childhood as well as social, emotional, intellectual and physical development.</p> <p>The strategy is influenced by two national agendas; Public Health England’s report on the prevalence of childhood obesity and Article 31 of the Convention on the Rights of the Child.</p> <p>The Play Strategy 2017-2027 seeks to ensure that all children have access to spaces and facilities for play and informal recreation. It identifies 6 aims within a vision for play which will guide the Council and influence partner activity over the next ten years.</p>

<p>Does the policy/strategy target or exclude a particular equality groups listed?</p> <p>(Consider Direct Discrimination)</p>	Race	Yes/No	<p>Target Disability Whilst all new and refurbished play areas are designed to be as accessible as possible to children and parents of all abilities, the strategy seeks to improve play opportunities for children with disabilities by providing specific play equipment that children with more complex disabilities can use at key neighbourhood play areas.</p> <p>Target Age The play strategy targets children up to the age of 18. It includes consideration of facilities for children in the older age category, as well as younger children's play areas.</p>
	Disability/carer	Yes/No	
	Gender/gender identity	Yes/No	
	Age	Yes/No	
	Sexual orientation	Yes/No	
	Religion & Belief	Yes/No	
<p>Does the policy/strategy affect any of the equality groups listed disproportionately?</p> <p>(Consider Indirect Discrimination)</p> <p>(List all negative and positive impacts)</p>	Race	Yes/No	
	Disability/carer	Yes/No	
	Gender/gender identity	Yes/No	
	Age	Yes/No	
	Sexual orientation	Yes/No	
	Religion & Belief	Yes/No	

What evidence has been used to make these judgements? Please tick one or more	Demographic data and other statistics, including census findings		Liaison with a local user group of parents of children with disabilities has informed the approach for providing more specific equipment for children with disabilities. The online survey was sent to this group as well as the general public and feedback obtained through the survey. Regular liaison with the Sussex Play Officer's Forum, helps to ensure that best practice is being followed and boundaries are being pushed to be as inclusive as possible.
	Information from groups/agencies/consultation/research within Horsham District	✓	
	Comparisons between similar functions / policies either internally or with other District Councils	✓	
	Analysis of complaints/public enquiries information/audits or reviews		

How is the effect of the policy/strategy on different equality groups going to be monitored? Please specify for each equality group	Race		Monitoring the effectiveness of the strategy for different equality groups will be carried out as part of the five year play strategy review process. More specifically liaison with the Horsham and District Access Forum and our local user group will be carried out annually to check effectiveness of additional facilities being provided for children with disabilities.
	Disability/carer		
	Gender/gender identity		
	Age		
	Sexual orientation		
	Religion & Belief		

Does the document have an access statement offering the document in alternative formats for disabled people? Yes No If no, please add to action plan as evidence that this assessment has assisted.	Do staff dealing with this document know where to get alternative formats if a request is made? Yes No If no, please add awareness training needed to action plan (Equalities Officer can provide)	Does the document need to be translated into key locally used languages? Yes No If yes, how will this be distributed and funded?
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Action Plan (to reduce or eliminate any adverse impacts)

Equality Strand	Action and Resources	Lead Person	Timescale
Provision of the document in alternative formats.	Communications will respond to requests for alternative formats on a case by case basis.	Communications	Within 2 weeks of the request.

Please send draft version to Personnel@horsham.gov.uk once a version of this assessment has been approved; it will be uploaded onto the website for public scrutiny/viewing and actions will be added to a spreadsheet/calendar for monitoring.

Report to Cabinet

23rd November 2017

By the Cabinet Member for Community and Wellbeing

DECISION REQUIRED



**Horsham
District
Council**

Not Exempt

Policy for issuing Fixed Penalty Notices

Executive Summary

This report seeks approval for the formal adoption of a policy for issuing Fixed Penalty Notices.

The Policy identifies the offences for which fixed penalties can be issued and sets out the scale of the penalties, the procedures for the issuing of Fixed Penalty Notice's and how an offender will be taken to Court if the Fixed Penalty Notice remains unpaid.

This Policy aggregates existing departmental policies into a single policy for the authority following changes to the legislation available to local councils.

Recommendation

Cabinet is recommended to agree and adopt the new Policy for issuing Fixed Penalty Notices attached as Appendix 1.

Reasons for Recommendations

To allow authorised Council staff to enforce legislation by means of a fixed penalty notice applying a standardised procedure.

Background Papers: Policy for issuing Fixed Penalty Notices

Wards affected: All

Contact: **Greg Charman**, Community Safety / Health & Wellbeing Manager, Horsham District Council. greg.charman@horsham.gov.uk, 01403 215124

Background Information

1 Introduction and Background

- 1.1 Local Councils enforce a range of legislation to protect the individual and the community as a whole. The Council has been accredited by the Chief Constable of Sussex with a range of powers under the Police Reform Act 2002, which can be exercised by individually accredited members of staff. The police powers also allow for Officers to stop and obtain details from suspected offenders and to seize alcohol and tobacco in certain circumstances.
- 1.2 These powers complement existing powers available to the Council under the Clean Neighbourhoods & Environment Act 2005, the Environmental Protection Act 1990 and other specific legislation which allows some of these powers to be dealt with by the issue of a Fixed Penalty Notice (FPN) in lieu of prosecution.
- 1.3 Horsham District Council has issued previous guidance to staff issuing Fixed Penalty Notices and some departments such as Environmental Health have individual Policies, however there has not to date been a council wide policy covering all staff able to issue Fixed Penalty Notices.
- 1.2 This report seeks approval for the formal adoption of the Policy for issuing Fixed Penalty Notices.

2 Relevant Council policy

- 2.1 The Council's Clean Neighbourhoods (Prevention/Enforcement) Strategy (S.3) reads "The Council accepts that enforcement action will form part of its strategy for improving local environmental quality and will apply this fairly and consistently and only where an awareness campaign has previously been undertaken".
- 2.2 The Council has also approved a District wide Public Space Protection Order with a number of prohibited activities in certain locations. To enable this order to be suitably policed, a policy for the issuing of Fixed Penalty Notices is required.

3 Details

- 3.1 The Policy identifies the offences for which fixed penalties can be issued and sets out the scale of the penalties, the procedures for the issuing of Fixed Penalty Notice's and how an offender will be taken to Court if the Fixed Penalty Notice remains unpaid.
- 3.2 This Policy aggregates existing departmental policies into a single policy for the authority following changes to the legislation available to local councils.

4 Next Steps

- 4.1 A Fixed Penalty Book will be issued and carried by all accredited staff and other council staff who have been appropriately trained.
- 4.2 A Payment Procedure has been established and will be followed by action in the Magistrates Court if fines remain unpaid within the statutory time limit.

5 Views of the Policy Development Advisory Group and Outcome of Consultations

- 5.1 The Community and Wellbeing PDAG has been advised of the proposed Policy and has supported the content.
- 5.2 The Policy has been created through dialogue with a number of internal Horsham District Council departments to whom it is relevant as well as the Council's senior Solicitor. Sussex Police have also been consultees in its development. The Policy sets out a fair and equitable approach to enforcement across the District.

6 Other Courses of Action Considered but Rejected

- 6.1 None

7 Resource Consequences

- 7.1 There is an ongoing requirement to ensure that all staff authorised to issue Fixed Penalty Notices receive training refreshers for legislative changes. This training would be delivered by an outside provider
- 7.2 There are no staffing consequences in respect of establishment at this stage, however this Policy is intrinsically linked to the Neighbourhood Wardens and therefore any growth to the Warden programme would need to be a consideration for training purposes.
- 7.3 Although Horsham District Council is able to keep any monies raised from the issuing of Fixed Penalty Notices, they are not seen as a way of raising income and any receipts will be used to support relevant awareness raising activities.

8 Legal Consequences

- 8.1 There may be some legal consequences if a Fixed Penalty Notice is appealed and the matter goes to court. In this situation legal resource would be required to support the officer who has issued the notice.
- 8.2 The process outlined in this policy will assist in reducing crime and disorder by sending clear signals that environmental crimes and anti-social behaviour will not be tolerated in the District and will be dealt with effectively by means of Fixed Penalties, written warnings and court action. In this regard there may be instances where problems which otherwise may have escalated will be reduced and therefore this could have a positive impact on reducing the requirement for legal resource.

9 Risk Assessment

- 9.1 There is no significant change in direction as a result of this strategy but there has been concern expressed about reputational risk by some members when low value play areas have been recommended for decommissioning. No decommissioning will take place unless evidence is produced demonstrating ongoing access to other proximate facilities.
- 9.2 There is also a risk that the production of an action plan could make the Council hostage to fortune. It should be noted that many leisure related action plans, whilst setting direction of travel and priorities, still remain couched within the context of competing agendas and scarce resources. Several of the identified projects do not yet have approved funding and thus have to be considered aspirational until s106 or CIL is identified.

10 Other Considerations

- 10.1 The Council must have regard to the Public Sector Equality Duty in section 149 of the Equality Act 2010. An Equalities Impact Assessment can be found attached to this report.

Horsham District Council

Policy for issuing Fixed Penalty Notices

September 2017

Fixed Penalty Notices issued by Horsham District Council

Fixed Penalty Notices (FPN) were introduced to local authorities as a means to deal with criminal offences such as littering, graffiti, dog fouling and breaches of a Public Spaces Protection Order as an alternative to a prosecution in the criminal courts. Offences where a FPN can be issued are set out in the table below.

An offender will be issued with a FPN if the Authorised Officer investigating the matter is satisfied that a criminal offence has been committed and that there is sufficient evidence to prosecute the offender in a criminal court. Penalties will vary according to the offence.

Situations where a FPN may be issued

Code	Offence	Legislation	Fixed Penalty within 15 days	Fixed Penalty within 29 days	Maximum Penalty on Conviction
1	Depositing litter	S.88 Environmental Protection Act 1990	£50	£75	£2,500
2	Waste Deposit Offence	S.33ZA Environmental Protection Act 1990	£250	£400	5 years prison and/or unlimited fine
3	Unauthorised distribution of free printed matter on designated land	Schedule 3A, paras. 1(1) and 7 Environmental Protection Act 1990	£50	£75	£2,500
4	Breach of Public Space Protection Orders (PSPO)	S.68 Anti-Social Behaviour Crime & Policing Act 2014	£80	£100	£1,000 (s67) £500 (s63)
5	Breach of Community Protection Notice (CPN)	S.52 Anti-Social Behaviour Crime & Policing Act 2014	£60	£100	£5,000
6	Failure to furnish written descriptions of waste (written information)	S.34A (2) Environmental Protection Act 1990	£180	£300	£5,000 (or an indictment and unlimited fine)
7	Failure to produce Authority (waste carriers licence)	S.5B Control of Pollution (Amendment) Act 1989	£180	£300	£5,000
8	Failure to comply with a waste receptacles notice (Commercial)	S.47ZA AND S47ZB Environmental Protection Act 1990	£60	£110	£1,000
9	Nuisance Parking	S6(1) Clean Neighbourhoods & Environment Act 2005	£60	£100	£2,500
10	Abandoning a Vehicle	S.2A Refuse Disposal (Amenity) Act 1978	£120	£200	£2,500 and / or 3 months in prison
11	Graffiti and fly posting	S.43 Anti-Social Behaviour Act 2003	£50	£75	£1,000 to £5,000
12	Failure to display no smoking signage in a smoke-free premises	S.6 Health Act 2006	£150	£200	£1,000
13	Smoking in a smoke-free place	S.7 Health Act 2006	£30	£50	£200

Receiving a penalty notice does not mean that the offender has received a criminal conviction. The FPN is given instead of a prosecution in court. If an offender receives a FPN, they have 15 calendar days to pay the penalty or to request a hearing. Offences offer a lower penalty if paid within 15 days. Failure to pay a penalty may result in a higher fine imposed by the court or imprisonment.

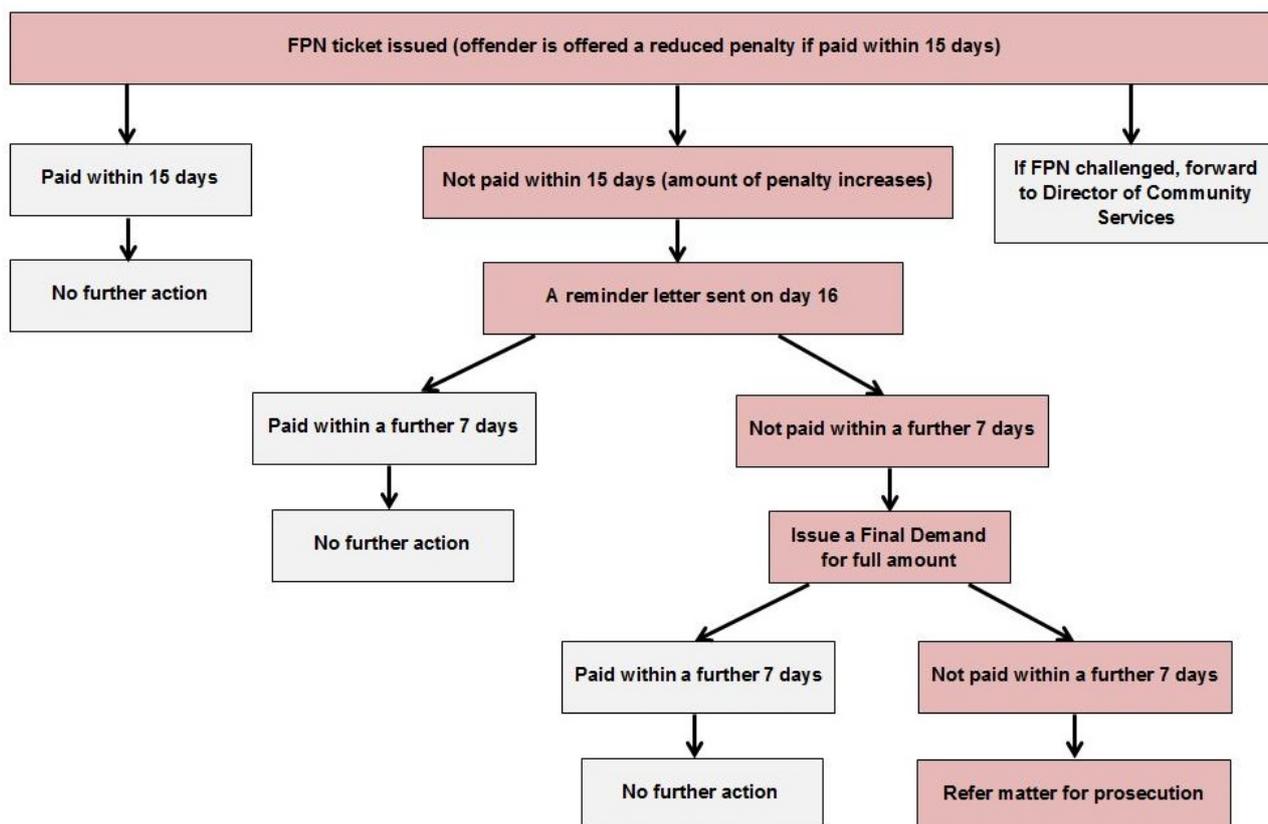
Procedure for issuing Fixed Penalty Notices

- Authorised officers of the Council will only issue a FPN where they consider that there is adequate evidence of an offence that will support a prosecution in court.
- Should the case proceed to court the Council will, in addition to any fine imposed, seek to recover its costs associated with the prosecution. The Council retains the right to review any FPN issued before prosecuting. However, in most cases the Council will proceed to prosecute for non-payment of FPNs.
- The Authorised Officers of the Council will investigate whether an offence applicable for a FPN has taken place. If the Authorised Officer is satisfied that there is sufficient evidence to issue a FPN, it will be issued.
- Where the offender refuses to give his/her details to an Authorised Officer during an investigation, an offence of obstructions is committed, and the offender will be reported (where practicable) for the original offence and the further offence. The Council will also seek assistance from the Police in ascertaining an offender's identity.
- In the event that a FPN remains unpaid after the expiration of 15 days then a reminder letter will be sent to the offender. If it remains unpaid 7 days after that then a final demand will be sent. Where an offender fails to pay the full amount due under the FPN after this period, the Council may consider prosecuting the offender.
- Where the identity of the offender is unknown, the Council will make enquiries to establish that person's identity and take the enforcement action appropriate.
- FPN's will not be issued to persons under the age of eighteen, however a warning letter may issued and with the young person's parents or guardian informed of the offence. Depending upon the seriousness of the offence other interventions (including court action) will be considered by Legal Services.
- Only an Authorised Officer who is authorised by the Council may issue a FPN and must carry with them at all times their Authorisation Card, signed by the Chief Executive, which displays their photograph, name and title together with the wording:

AUTHORITY TO ISSUE FIXED PENALTY NOTICES

This is to certify that the Officer whose photograph is shown overleaf has been authorised by Horsham District Council to issue Fixed Penalty Notices for environmental offences; breaches of a PSPO; to enforce District Byelaws; and require the name and address of persons believed to be committing a relevant offence.

Fixed Penalty Notices – process chart



What information is contained in the FPN

FPNs must state all of the following:

- The alleged offence, for example, littering or graffiti.
- Where and when the offence took place.
- How the FPN has been issued (in person or by post).
- The fine imposed (and if there's a discount for paying early).
- When the fine must be paid by (this must be at least 15 days).
- How the fine can be paid.

What happens if there is a failure to pay the FPN?

The offender is very likely to receive a summons to attend a Magistrates' court hearing for the offence they received the FPN for.

What happens when a FPN is paid?

Payment of a FPN means that no further action will be taken for that particular offence.

What happens if a person wishes to challenge the issue of a FPN?

Authorised officers of the Council will only issue a FPN where they consider that there is adequate evidence of an offence that will support a prosecution in court. However, if it is believed that the offence in question did not take place or that the issue of the FPN was incorrect, a challenge to the Director of Community Services can be made along with opting not to pay the FPN and attending court, if summonsed, to present the case.

Should the case proceed to court the Council will, in addition to any fine imposed, seek to recover its costs associated with the prosecution. The Council retains the right to review any FPN issued before prosecuting. However, in most cases the Council will proceed to prosecute for the non-payment of FPNs.

What happens to the FPN payments?

Monies received from FPNs will be re-invested by the Council to help fight Environmental Crime and to maintain a cleaner, safer environment within the district.

How payment can be made

Payment may be made as follows:

1. Online at: www.horsham.gov.uk and then follow the links from 'online payments' quoting the notice reference number.
Payment will be accepted with the following debit and credit cards: Switch, Solo, Visa Delta. Visa, Mastercard.
2. By debit or credit card by telephoning 01403 215054 with your card details and quoting the notice reference number.

Data Retention

The Council will keep records of the FPNs issued, from issue through to payment or prosecution, (along with any evidence) in case the FPN goes to court. These records will be held and disposed of securely in line with Data Protection principles.

Policy Review

The policy will be reviewed annually by the Director of Community Services. Views on the policy and its implementation will be sought to ensure it continues to meet the principles of good enforcement.

This Policy was adopted by the Council at the meeting of the Cabinet held on XXXXX 2017.

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Report to Cabinet

23 November 2017

By the Cabinet Member for Housing and Public Protection



Information Report

Not exempt

Affordable Housing Investment

Executive Summary

Our Housing Strategy (adopted 2013 and reviewed 2017) has the objective of increasing the supply of homes that people in housing need can afford. This commitment has delivered 1186 new affordable rented and shared ownership homes across the district since 2010.

A significant part of this strategy has been realised by using affordable housing commuted sum payments (secured from housing developers through Section 106 agreements where affordable housing is not provided on site). This approach has seen an investment of over £8 million over a seven year period and has helped deliver 240 of those 1186 affordable rented units

To deliver affordable rented housing in the district the Council has historically worked very closely with a number of Registered Providers (formally known as Housing Associations or Registered Social Landlords) such as Saxon Weald (created by Horsham District Council to manage the Council's former housing stock following the completion of Large Scale Voluntary Transfer in 2000), Stonewater and Hyde Housing. This approach became much more challenging when the Government unexpectedly introduced a requirement for Registered Providers to cut rents in real terms by 1% pa for a period of 4 years. As a result of this rent Registered Providers reassessed their financial models, halted their proposed development plans and became more reliant on greater contributions from commuted sums. This period of uncertainty also coincided with a sharp increase in the level of commuted sums collected by this Council primarily due to progress with large scale housing developments such as the West of Horsham schemes.

In 2017 the Government has made a number of new announcements and statements on the housing crisis and affordable housing. It is therefore a good time to review the Council's approach to investing in affordable housing. This report sets out the future direction for the Council as it continues to invest in affordable housing and make the best use of commuted sums. It recommends that we continue to work with Registered Providers and we invest in good quality temporary accommodation. It also proposes that the Council undertakes further work to assess the case for the creation of a vehicle to enable the direct delivery of affordable housing. In undertaking this work the Council needs to be mindful that at the time of this report the Government has not yet fully articulated its view of the future for affordable housing.

Recommendations

Cabinet is recommended to:

- Review and support the Council's approach in investing in affordable housing as set out in sections 3.2 and 3.3 of this report
- Note that further work will be undertaken in developing and accessing options for the delivery of affordable housing as set out in section 3.4 of this report

Reasons for Recommendations

- i. To assist the Council in achieving its target of delivering 240 affordable homes a year through the allocation of affordable housing commuted sum payments to maximise on site delivery.
- ii. To assist the Council to achieve its objective to reduce the number of households having to be placed in bed and breakfast accommodation through the provision of additional temporary accommodation.

Background Papers

Horsham District Housing Strategy Position Statement Annual Review 2016/17

Wards affected: All wards affected.

Contact: Rob Jarvis, Head of Housing Services 01403 215449

Background Information

1 Introduction and Background

1.1 National picture

In 2015/16 central government told all Registered Providers that they must make a rent reduction of 1% pa for 4 years through to 2019/20. This was in sharp contrast to the long standing Government policy of allowing rents to rise by RPI plus 1% a year. Registered Providers were caught unaware by this proposal and were forced to reassess their financial modelling. At the same time it was announced there would be no grant for rented homes and that the focus would be on home ownership with Government grants being allocated towards the delivery of shared ownership. As a result, the majority of national Registered Providers had no choice but to halt their development plans and reassess their development aspirations with a substantially reduced income forecast. In practice often this meant delivering half the number of houses originally intended or them making significant changes to the profile of sites to increase the proportion of units for sale at normal market prices in order to help cover the cost of the affordable homes there.

2017 has seen a renewed focus from Government on the issue of affordable housing. In February it published the Housing White Paper – ‘Fixing our Broken Housing Market’. This set out the Government’s intention to provide a revised definition of affordable housing within the National Planning Policy Framework, introduce affordable private rented housing and support innovation from local authorities to promote more house building. Government would however expect new tenants of affordable properties to be offered equivalent terms to those in council housing including a right to buy their home.

In September the Communities Secretary announced a green paper on social housing that would be a ‘wide-ranging, top-to-bottom review of the issues facing the sector’. The green paper’s intention was to start a nationwide conversation on social housing. This was followed by the Prime Minister launching her vision to renew the ‘British Dream’ at the Conservative Party Conference in October. In her speech she confirmed that the cornerstone of this was to fix the ‘broken’ housing market. The broad proposals were to increase support for Help to Buy, provide additional funding for affordable housing and post 2020 rent increase of Consumer Price Index + 1% for five years were confirmed, essentially returning to the arrangements in place prior to the 2015 rent cuts.

1.2 Local picture

An example of how changes introduced in 2015 have impacted locally is the Winterton Court site in Horsham. When this site was originally proposed it was set to offer almost 70 affordable homes. The final site approved had a different look with 23 affordable homes (20 affordable rent and 3 shared ownership) and just over 40 for market rent.

The annual 1% rent reduction policy has meant locally Registered Providers are unable to deliver affordable rented homes as they have done in the past. Where sites do lend themselves to additional rented units the amount of funding support needed to deliver those homes has increased significantly. In some cases this has increased by almost five times when compared to the average financial support provided to Registered Providers prior to 2015.

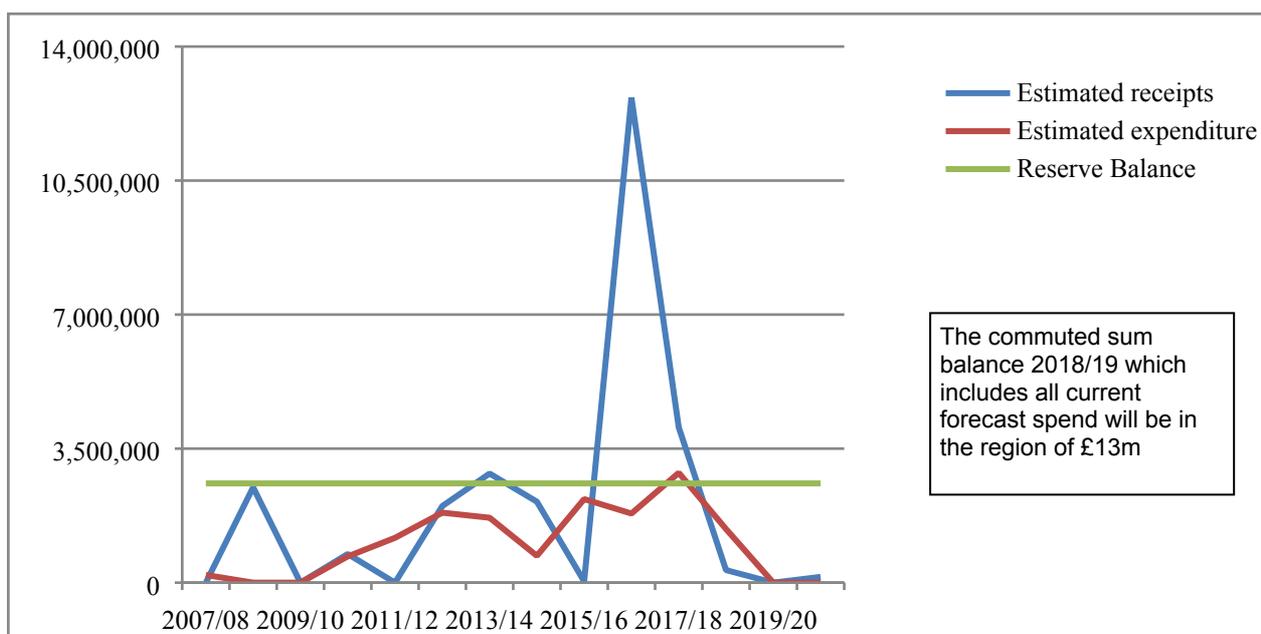
Despite the imposition of the rent reduction policy, our district target remains that of delivering 240 affordable homes per year made up of both affordable rented and shared ownership accommodation. This figure was identified using the Strategic Housing Market Assessment (SHMA) and detailed analysis of the Housing Register. Examining a snapshot of the delivery of affordable homes between 2013 and 2017 shows that 858 affordable

homes have been delivered. If the target had been fully met 960 homes would have been delivered. Had government policies affecting Registered Providers not have been implemented it is anticipated the target would have been met.

1.3 Commuted Sums

As can be seen from the graph below, there has been a large spike in council income from commuted sums over the recent period. Whilst the s106 agreements with the two developers of this 2500 unit scheme secured a substantial number of affordable units on site, part of the balance was made up through commuted sum payments. At the time, this agreement in itself was not a concern. Registered Providers had progressive and sizeable development plans which would have required financial support to maximize affordable rented unit delivery. The abrupt policy changes described above however changed this scenario.

The graph demonstrates minimal expenditure in 2007/08. Expenditure increased in response to the upturn in collection of commuted sums in 2009/10. The Council's actions and successful partnership with the Registered Providers saw income closely mirroring expenditure rates between 2009 and 2015 which led to the good level of affordable homes delivery referred to above. However the sudden reduction in income to Registered Providers, as a result of the new rent reduction policy, meant that this could not be maintained.



Historically the average balance of commuted sums has been around £2.5 million. If this historical level of reserves is to be retained as a future base figure, it provides the council with a "surplus" of £10.5 million. However, as can be seen, receipts are predicted to drop dramatically as we reach 2019/20. Mindful of these figures, it is appropriate for the council to review its policy. In doing this it does however have to be equally fully mindful of ongoing changes in Government policy.

There are a number of points that need to be considered when determining the best future use of commuted sums. These are:

- At present the graph above demonstrates, estimated receipts dropping away to levels similar to 2007/08 post 2017. However this could change if the review mechanisms that the Council have in place demonstrate that schemes have been more financially viable as the

housing market has improved and in turn could provide for additional affordable housing. This could deliver an additional £5 million in receipts over the next five to ten years.

- The changing market in which Registered Providers have had to operate with reduced government grant is leading to a reduction of affordable rented properties being delivered. The Government has signaled its intention to reverse this decision.
- Registered Providers are requesting substantially increased financial support (around five times as much when compared to previously delivery averages) to provide the Council with nomination rights. Historically providers were able to access funding from Homes and Communities Agency to deliver rented accommodation. This is no longer the case. They could also estimate income from rented units increasing which was brought to an end when the rent cuts were introduced in 2015.
- Annual cost of providing bed and breakfast accommodation to homeless households now averages £234,000 per annum (2013 to 2017). This is unsustainable as a financial model. We have gained invaluable experience of delivering temporary accommodation. This includes the use of £2.9million commuted sums to deliver 17 units of new temporary accommodation at Bishopric to support our homeless households and reduce our reliance on expensive bed and breakfast.
- There has been an increase in households with an identified housing need. The Housing Register stands at 695 households (01/06/2017). This compares to 565 as at 01/06/2016.

2 Relevant Council policy

2.1 This report accords with the objectives of the Corporate Plan as it will help:

- Support the delivery of housing to meet local need
- Prevent homelessness throughout the Horsham District
- Provide access to appropriate and affordable housing
- Reducing the number of households placed in Bed and Breakfast accommodation

3 Details

3.1 To make the best future use of the commuted sum funding and to provide a range of housing solutions to those in greatest housing need, we need more than one solution. We have a proven track record in delivering accommodation through Registered Provider partners and can meet our short term demand for temporary accommodation with direct delivery. These models work and we will continue them whilst there is an identified need. We will also continue to explore options for direct delivery of affordable accommodation. These solutions are set out in more detail below.

3.2 1. Support of Registered Providers to deliver affordable rented accommodation

We have worked in partnership and provided substantial support to Registered Providers in the past which has enabled us to deliver affordable rented homes for those in housing need. We will consider continuing to do this on sites that have specific issues preventing their delivery where this could be unblocked with additional funding. In return for supporting Registered Providers to deliver accommodation, we receive 100% of nomination rights to the initial vacancies and 75% of all subsequent resulting vacancies. The access to these nomination rights directly reduces the number of households on the district's housing register and in temporary accommodation.

A recent example of the support we are able to provide is the site of 20 affordable rented properties which were delivered by Saxon Weald in Cowfold. This provided the Council with

20 additional nominations rights for those on the Housing Register. Two further sites have received commuted sum spending approval and we await delivery of 15 units of rented accommodation (8 rented homes in Coldwaltham with Stonewater and 7 rented homes in Christs Hospital with Hyde Housing).

Supporting Registered Providers to deliver affordable rented accommodation will continue to deliver a number of benefits including:

- Providing homes for the increasing number of households on the Housing Register.
- Supporting reaching our affordable homes delivery target.
- Meet specific demand pressures. Adapted units of larger family homes, for example.

To make the best use of commuted sums we need to ensure our work with Registered Providers delivers the accommodation we need and in the areas of greatest demand. An assessment of demand has been completed through an analysis of the Council's Housing Register, the Strategic Housing Market Assessment and Parish Housing Needs surveys alongside data available in respect of West Sussex Health Profiles and the Office of National Statistics Population Projections. This has provided a set of objectives which can be used to guide our work with Registered Providers. In future we will encourage schemes that:

- Provide accommodation in the areas of greatest demand. These are Horsham Town, Broadbridge Heath, Southwater, Billingshurst and Warnham.
- Deliver smaller units of accommodation. 36 per cent of households on the Housing Register require one bed accommodation.
- Provide an accommodation solution to those households in housing need that would be adversely affected by welfare reform changes. This includes households under the age of 35 being restricted to the Local Housing Allowance (LHA) shared room rates as an upper rental threshold.
- Provide an accommodation solution in smaller parishes where hidden households unable to secure suitable affordable housing in their home town/village can be identified through local housing needs surveys. Previous local connection schemes have been delivered in Amberley, Ashington, Cowfold, Henfield and Washington in recent years.
- Support options for community-led housing solutions identified through the Sussex Community Housing Hub. Horsham District Council has co-funded a Community Led Housing Advisor with a number of other East and West Sussex Authorities to provide communities with an expert to help shape to identify opportunities that may be available to deliver accommodation in their community to meet their local objectives and demand.
- Provide specialist accommodation for those with disabilities to both live independently and provide appropriate accommodation for families with disabled children to function as a family unit. There are currently 44 households on our housing register with an identified need for adapted accommodation.
- Provide accommodation to meet the changing demographic of the District. This could include extra care schemes similar to that delivered previously by Saxon Weald at Highwood Mill. Horsham District profile data suggests we will have a 72.2% growth in our population aged 65+ to 2039 including an extra 3,629 residents aged 90+ over the same period.

3.3 2. Delivery of temporary accommodation

Delivering additional units of temporary accommodation for those facing homelessness provides a number of benefits:

- Reduces reliance upon unsuitable Bed and Breakfast for our most vulnerable households.
- Reduces in Bed and Breakfast expenditure - Average £234,000 pa 2013 to 2017 but which will increase with service demand.
- Reduces the council's average annual cost of bed and breakfast accommodation by around £200,000 per year
- Generates income from temporary accommodation rental units, thereby contributing to the funding of our housing services.
- Enabling us to rationalise our current temporary accommodation stock which in turn will allow us to de-commission ineffective stock and potentially dispose of or redevelop sites. This will provide further benefits such as capital receipts or redeveloped sites providing alternative housing.
- Mitigating additional accommodation obligations that will be placed upon Local Authorities in respect of the Homeless Reduction Act 2018.
- Utilisation of commuted sum (Section 106) funds where agreements allow.
- The delivery of additional temporary accommodation units therefore meets the Council's Strategic plan to improve the Council's housing stock and build revenue streams through an increasing investment portfolio.

Opportunities for additional acquisition are being negotiated and we have two schemes detailed below that are included in the 2018/19 capital programme.

Proposed Temporary Accommodation Sites			
Site	Potential Units	Funding	Year
Rowan Drive, Billingshurst	8	£1.5m	2018/19
Peary Close, Horsham	8	£1.5m	2018/19

We do not need to continuously deliver new temporary accommodation. The schemes listed above will enable us to meet the current demand levels and further reduce the reliance upon bed and breakfast accommodation. It should be noted that there will always be need for some level of bed and breakfast accommodation.

3.4 Looking ahead - creation of a new vehicle to deliver affordable housing?

It is important to ensure all opportunities to increase permanent affordable housing delivery are investigated. We have undertaken an initial assessment of creating a wholly owned Council Housing Company but we need to fully understand the implications of this. Not least in the light of recent Government announcements that have suggested affordable housing owned by council housing companies could be subject to 'right to buy'. Indeed the Secretary of State's regular use of the phrase 'housing crisis' and the flurry of announcements from the Government on affordable housing and housing in general has considerably added to the uncertainty around the future of affordable housing. It is welcome that the Government is being more proactive but it does mean any significant change in policy by the Council will have to be fully understood before proceeding.

The work completed to date has identified a number of options for the holding of permanent stock and these need be considered in greater detail. They include:

- Council operated Registered Provider
- Wholly owned Housing Company
- Arms-Length Management Organisation (ALMO)
- Blended approach of multiple options

Delivering additional units of permanent accommodation could provide a benefits including:

- Ensuring smaller sites provide on-site delivery where traditionally Registered Providers decline to bid for the affordable housing allocation.
- Creating a portfolio of accommodation that could be used to finance further development providing a longer term delivery stream.
- Ability to ensure developments focus on the unmet needs of those on the Council's Housing Register.

Given the number of changes and increasing complexity of Government affordable housing policy, it is recommended that we commission an appraisal to review our options and make recommendations for the district council's own future policy for provision of affordable housing.

4 Next Steps

- 4.1 In order to continue the approach referred to within this report, meet the significant challenges facing the affordable housing market and make the best use of commuted sums we need to pursue a flexible approach. As this report has demonstrated policy shifts by the Government have had a significant impact on the delivery of affordable housing and the level of commuted sums. We should look to maximize our use of commuted sums and it is likely this will include continuing to work with Registered Providers where it is appropriate to do so and have an on-going commitment to invest in new temporary accommodation to meet demand. The recent large increase in the level of commuted sums held by the Council also offers the opportunity to investigate fully the possibility of directly delivering affordable rented homes. This could offer an additional way to make the most effective use of the funding. It goes without saying that in bringing forward proposals the Council will have to keep fully informed of the Government's evolving agenda on affordable housing.

5 Views of the Policy Development Advisory Group and Outcome of Consultations

- 5.1 The proposals to support Registered Providers and deliver additional temporary accommodation were discussed and supported by the Housing and Public Protection Policy Development Advisory Group 21st August 2017. The recommendation to further investigate methods to deliver additional permanent housing units was in principle supported pending the outcome of an assessment of options.

This report will be taken to Housing and Public Protection Policy Development Advisory Group 20th November 2017.

- 5.2 This report reflects recommendations from the Council's Interim Monitoring Officer
- 5.3 The Head of Finance supports the points detailed within the paper and highlighted the need to consider income generation through any development opportunities that become available.

5.4 The general principles of this report have been shared with two Registered Providers.

- Saxon Weald commented that the targets set were understandably broad. They also understood the need for all future options to be examined and suggested they would be happy to explore closer collaborative working that would help meet the objectives set out in section 3.2.
- Moat Housing have also been consulted as a larger stock holding partner operating across a number of Council areas in the South East. They commented in support of the recommendation to continue to support Registered Providers. They further added their support specifically to flexible approach the Council has adopted to facilitate the most appropriate tenure splits on site.

6 Other Courses of Action Considered but Rejected

6.1 This report is for information only and advises the current position of the Council's affordable housing commuted sum spend. Any options to be progressed at a later date will be brought to relevant PDAG(s) for comment and to the cabinet for approval.

7 Resource Consequences

7.1 No financial consequences.

7.2 The financial consequences of any individual options that may be progressed will be reported to Cabinet.

8 Legal Consequences

8.1 No legal consequences.

8.2 The legal consequences of any individual options that may be progressed will be reported to Cabinet.

9 Risk Assessment

9.1 There are no direct risks associated with this report.

10 Other Considerations

10.1 There are no consequences in respect of Crime & Disorder; Human Rights; Equality & Diversity and Sustainability.

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Report to Cabinet

23rd November 2017

By the Cabinet Member for Housing and Public Protection

DECISION REQUIRED



**Horsham
District
Council**

Not Exempt

Discretionary Disabled Facilities Grants

Executive Summary

A West Sussex County wide project is currently being undertaken to explore innovative new ways of delivering Disabled Facilities Grants. As part of this project it has been agreed that a more flexible approach to the use of discretionary DFGs be adopted in order to help and improve the health and well-being of disabled people and make more use of the additional resources available. This report seeks approval to introduce a number of housing interventions to use discretionary DFGs to assist people with repairs and adaptations in their homes.

Recommendations

That the Cabinet is recommended:

- i) To approve the discretionary DFG assistance detailed in paragraph 3.8 of this Report

Reasons for Recommendations

- i) To enable the Council to sustain a robust Private Sector Housing Assistance Policy.
- ii) To use effectively the increase in funding the Better Care Fund is providing to local authorities for home adaptations.

Background Papers

Private Sector Housing Assistance Policy.

Wards affected: All

Contact: John Batchelor, Head of Environmental Health and Licensing, Extension 5417

Background Information

1 Introduction and Background

- 1.1 The purpose of this report is to seek approval for amendments to the Private Sector Housing Assistance Policy to increase the amount and type of discretionary DFG assistance the Council is able to offer to improve the health and well-being of disabled people and help them to live safely in their homes.
- 1.2 The Council's Private Sector Housing Assistance Policy was first adopted in July 2003 and included provision for mandatory DFGs. An updated policy was adopted by Cabinet at its meeting of 22nd September 2016 which increased the amount of assistance available to help a disabled person move to a more suitable property and made available discretionary DFGs as a 'top up' to mandatory DFGs, subject to available resources.
- 1.3 In 2016 West Sussex County Council (WSSCC) and the West Sussex District and Borough Councils agreed to implement a project to explore innovative new ways of delivering Disabled Facilities Grants. As part of this project it has been agreed that a more flexible approach to the use of discretionary DFGs should be adopted.

2 Relevant Council policy

- 2.1 The Private Sector Housing Assistance Policy contributes towards the District Priority: Support our Communities.

3 Details

- 3.1 DFGs are the only mandatory grants and are available to disabled people when works to adapt their home are judged necessary and appropriate to meet their needs and when it is reasonable and practicable to carry them out having regard to the age and condition of the dwelling. DFGs are generally subject to a test of resources which means that the applicant's income and savings have to be assessed. The maximum amount of DFG is currently set by statute at £30,000 and has been at this level since 2008. The Occupational Therapists at West Sussex County Council assess whether any works are necessary, but the statutory responsibility for providing DFGs falls on the local housing authority (District and Borough Councils in two-tiered areas). The Council is given a sum of money each year by the Government, which is specifically to be used for providing grants to help disabled people stay in their own homes.
- 3.2 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO) gave local housing authorities the power to adopt discretionary policies with regard to housing interventions to promote independent living and wellbeing. In 2008 a number of changes were made to the way DFGs were administered and could be used which included the relaxation and removal of the ring-fence (2010) allowing DFG monies to be used more flexibly to help keep people safe and well at home and to reduce bureaucracy in the grant's administration.

- 3.3 Historically there has been insufficient government funding to meet the demand for mandatory DFGs and local housing authorities have either had to find extra budget from their own resources or delay approval and payment of grants using provisions of the legislation. Therefore Horsham District Council had not been in the position to offer discretionary DGF assistance (other than Moving Home Assistance to help a disabled person to move to more suitable accommodation).
- 3.4 Since the introduction of the Better Care Fund (BCF) in 2015, capital funding for DFGs is now paid directly to upper tier authorities (WSCC), but the statutory duty continues to sit with the local housing authority. Currently the upper tier authorities have to allocate funding to their respective housing authorities as directed by Government. Since the introduction of the BCF, funding for DFGs has significantly increased and this is in line with the Government's commitment in autumn 2015 to increase national funding to £500m by 2119/20 for DFGs. Accordingly the DFG budget in West Sussex has increased significantly such that last year the overall budget allocated for DFGs across West Sussex was underspent.
- 3.5 In 2016 WSCC and the West Sussex District and Borough Councils agreed to implement a project to explore innovative new ways of delivering DFGs. As part of this project it was considered that the increase in DFG funding from the BCF gives local housing authorities the opportunity to use the powers in the RRO 2002 to provide discretionary DFG assistance and that a flexible approach to the use of discretionary DFGs should be adopted.
- 3.6 The Project Working Group considered how the increase in the DFG budget could be effectively used to improve the home environment to enable people to remain independent in their own homes for longer.
- 3.7 It was agreed that a number of changes could be implemented within the mandatory DFG regime as follows:

Description	Conditions and narrative	Subject to Means Test	Amount Available	Reasoning & rationale behind working group's decisions
<p><u>Extended warrantees:</u></p> <p>For all adaptations which require electrical installations such as through-floor lifts, step lifts, stair lifts, closomats etc.</p>	<p>To be provided for all such adaptations regardless of tenure.</p> <p>Some Registered Housing Providers (RHP) take on responsibility for servicing and repairs once the standard 1 year warrantee expires and therefore extended warrantees will not be offered in these circumstances.</p> <p>Minimum 5 year warrantee with the option of extending at the end of the period.</p>	Yes	Within the current maximum DFG £30,000	<p>Gives families peace of mind and timely / stress free assistance if the adaptation should break down.</p> <p>Allows people to live well in their home for as long as possible.</p> <p>Helps to reduce repeat DFG applications for repair or replacement of adaptions.</p>

<p><u>Reduction in number of quotes</u></p> <p>Aim to use 1 quote where appropriate for common, simple adaptations such as stairlifts, ramps and lifts.</p>	<p>Two or more quotes to be sought for adaptations where a single contractor is carrying out work or multiple works expected to total over £10,000.</p>	<p>Yes</p>	<p>N/A</p>	<p>Reduce applicant waiting time for straight forward adaptations which can be completed quicker.</p> <p>Grant officers to use professional judgement and discretion.</p>
<p><u>Referrals from privately practicing Occupational Therapists</u></p>	<p>Mandatory DFG legislation states that District & Boroughs must consult the social services authority</p> <p>Standard letter to be used. District & Boroughs to proceed with DFG if no response from the social services authority within 14 days.</p> <p>Letters to be sent by District and Boroughs to Senior Practitioner OT at locality offices, not to Adult Care Point 2 (ACP2).</p> <p>Applicants must give consent for their personal details and the recommendation to be shared with WSCC as the social services authority.</p>	<p>Yes</p>	<p>Up to current maximum DFG £30,000</p>	<p>Customer has choice as to whether to appoint a private OT</p> <p>Timely option for simple adaptations as not subject to social services authority waiting times.</p>
<p><u>Direct Referrals</u></p> <p>WSCC to make direct referrals to the District or Borough for adaptation via the DFG if identified at initial assessment stage</p>	<p>Currently, ACP2 carry out initial assessments over the telephone with customers or their representatives. If a shower or stairlift is indicated and the person does not have complex medical conditions, the referral will be made directly to the District or Borough to proceed with the DFG.</p> <p>A standard referral form will be used by WSCC using existing</p>	<p>Yes</p>	<p>Up to current maximum DFG £30,000</p>	<p>Reduces waiting time for straight forward adaptations.</p> <p>Good relationships exist between WSCC and District and Boroughs which ensure that advice can be sought at any time throughout the process. Similarly, review of adaptation to be carried out once complete by OT/A.</p> <p>Grant officers are generally skilled and experienced in planning</p>

	IT case management system. The adaptation to be reviewed by a WSCC OT/A once complete and any other needs addressed.			for simple shower adaptations. Contractors can recommend specific stairlifts to meet simple needs.
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3.8 The Project Working Group agreed that the following discretionary DFG assistance would help keep people safe and well at home by ensuring that people who need adaptations get the help they need:

Description	Eligibility criteria & conditions	Subject to means test	Amount available	Reasoning & rationale behind working group's decisions
<u>Partial waiver of contribution following means test</u>	Eligible for DFG Assists every applicant with a contribution regardless of tenure.	Yes	Maximum waiver of first £5,000 of assessed contribution.	Most benefit will be for families in work but on a low income, those who have little to no disposable income or those paying off debt or with a poor credit history. Likelihood that this will help most people with smaller contributions to access necessary adaptations.
<u>Help with assessed contribution following means test.</u>	Based on WSCC "Financial Statement for Funding Towards Home Adaptations" In cases where there is particular difficulty paying an assessed contribution, applicants will be given the opportunity to complete a financial statement of their income and outgoings which will be considered by the District and Borough Council. Offered on a case by case basis at the discretion of the District or Borough Council.	Yes - first £5000 of contribution to be waived	No maximum	Takes outgoings, debt repayments etc. into consideration and offered on a discretionary basis. Reduces risk of customer not proceeding with necessary adaptations because they cannot afford the assessed contribution. Single, timely and less complicated system for customers.

<p><u>Funding in excess of current maximum mandatory grant of £30,000</u></p> <p>(replaces current Top Up process)</p>	<p>Eligible for the DFG and considered on a case by case basis</p> <p>A charge for the full amount will be placed on owner occupied property for a 10 year period</p> <p>Charges will not apply to Registered Housing Provider (RHP) or privately rented property. (This approach is consistent with the DFG Land Charge powers that were introduced in 2008).</p> <p>Condition that RHPs register the property as being adapted and offer it to other families in need of the adaptations, should the property become vacant.</p> <p>District & Boroughs to seek permission from members to offer further funding, on a case by case basis should total cost of works exceed £60,000</p>	<p>Yes - first £5000 of contribution to be waived</p>	<p>Up to a maximum of £30,000 (total of £60,000)</p>	<p>Single, timely and less complicated system for customers.</p> <p>Major adaptations which have been identified as essential to meet the disabled person and their family's needs & once all other options (such as moving) have been considered.</p> <p>Good collaboration between District and Borough Council and the local authority to ensure money is spent appropriately.</p>
<p><u>Relocation Grant</u></p> <p>To support people when moving to more suitable accommodation is preferable to adaptations.</p>	<p>Eligible for DFG</p> <p>Available to owner occupiers and private tenants where it is not reasonable or practicable to adapt the property to meet the disabled person's assessed needs.</p> <p>Conditions:</p> <p>The proposed property must be confirmed as suitable by the Private Sector / Housing Standards Teams and be assessed to meet the needs (or more easily adaptable to do so) of the disabled person by the social services authority OT.</p> <p>Owner occupiers to commit to remain in the property for five years (not applicable for private tenants)</p>	<p>Yes - first £5000 of contribution to be waived</p>	<p>Maximum of £10,000 to cover the costs arising from the following: estate agents fees (limited to a maximum of 1.5% of the property value) stamp duty (limited to a maximum amount of £7,500) solicitors fees valuation fees mortgage arrangement fees removal costs necessary utility and service set up costs</p>	<p>Assists disabled and vulnerable people to move to more suitable accommodation particularly where adaptations cannot be carried out or the property is over occupied.</p>

			Minor adaptations to enhance the property's suitability.	
<p><u>Hospital Discharge Grants</u></p> <p>Support all vulnerable or disabled people being discharged from hospital</p>	<p>Available to all vulnerable or disabled people needing to be discharged home from hospital, regardless of tenure.</p> <p>Conditions:-</p> <p>Referrals accepted from adult social care or hospital OT / physiotherapists , rehabilitation/intermediate care teams, discharge coordinator, or Patient Advice and Liaison Service (PALS)</p> <p>Excludes packages of care funded by NHS continuing healthcare</p> <p>Works to include but not restricted to: property clearance, deep cleaning, urgent home repairs, removal of hazards, repair of heating systems, and provision of emergency heating.</p>	No	Maximum of £3000 (negotiable on a case by case basis dependent on type of works required)	<p>Reduce delayed transfers of care where home is not suitable for discharge home from hospital.</p> <p>Reduce re-admissions to hospital.</p> <p>Acknowledges that inappropriate housing puts health and wellbeing at risk.</p>
<p><u>DFG Fees Grant</u></p> <p>Available when DFG does not proceed but preparatory work has been carried out</p>	<p>Eligible for DFG.</p> <p>To cover reasonable professional fees and associated charges such as private OT fees where engaged to advise on what works are required and specialist technical e.g. Structural Engineer fees, surveyor fees or similar to determine if a DFG project is feasible.</p>	<p>Yes (including children's cases)</p> <p>First £5000 of contribution to be waived</p>	Maximum of £2,000	<p>Encourages local surveyors / engineers to work with District & Boroughs.</p> <p>Encourages improved schemes to be considered, so better outcome for the disabled person.</p> <p>Does not financially disadvantage the disabled person if works cannot proceed.</p> <p>Single, less complicated system for customers.</p>

<p><u>Safe and warm homes grant.</u></p> <p>Assists disabled & vulnerable people, including those with dementia or a visual impairment to make changes which supports them to live in their own home with reduced risk and for longer.</p> <p>To help low income home owners and private tenants to quickly access financial assistance for a wide range of minor adaptations and repairs to reduce risks of accidents in the home</p>	<p>Eligible for DFG. For all disabled people regardless of tenure.</p> <p>Referrals accepted from WSCC OT/A, adult social care or hospital teams, hospital based OTs, advocates, voluntary and community sector.</p> <p>Excludes care packages</p> <p>Includes:- Repairs to all disabled equipment (excluding equipment provided by the West Sussex Community Equipment Service (CES))</p> <p>Minor equipment and adaptations where CES cannot provide assistance.</p> <p>Repairs to boilers and other heating systems.</p>	<p>Yes - first £5000 of contribution to be waived</p> <p>.</p>	<p>Normally maximum of £5000</p> <p>Negotiable on a case by case basis dependent on type of works required.</p>	<p>Enables necessary works including repairs which have a direct positive impact on a disabled person's health.</p> <p>To help low income home owners and private tenants to quickly access financial assistance for a wide range of minor adaptations and repairs.</p> <p>To reduce risks of accidents in the home.</p>
<p><u>Council Tax Reduction to be considered a DFG passport benefit</u></p>	<p>Eligible for DFG.</p> <p>Treat Council Tax Reduction as a passport benefit under a Discretionary DFG scheme.</p>	<p>No – applicants in receipt of this benefit will not be means tested.</p>	<p>Up to current maximum DFG £30,000</p>	<p>Anticipated to help the small number of people in sole receipt of this benefit to access necessary adaptations.</p>
<p><u>Tech Grant</u></p> <p>Technology enabled care eg life line, fall detectors, key safes – for purchasing equipment and monthly fee to connect with call centre (if required)</p>	<p>Eligible for DFG.</p> <p>Available to all disabled applicants regardless of tenure.</p> <p>For a period up to 5 years</p> <p>This assistance will only be available in cases where there is particular difficulty paying the monthly rental charges, applicants will be given the opportunity to complete a financial statement of their income and outgoings which will be considered by the District and Borough Council.</p> <p>Based on WSCC “Financial Statement for Funding</p>	<p>Yes</p>	<p>Maximum of £3000</p>	<p>Supports a technology based approach to keeping people safe and well in their homes.</p>

	Towards Home Adaptations”			
	Offered on a case by case basis at the discretion of the District or Borough Council.			

3.9 Funding for the proposed discretionary DFG assistance will be through the BCF which is also used to fund mandatory DFGs. Therefore the budget will need to be closely monitored to ensure that the Council has sufficient budget to meet its statutory duty to provide mandatory DFGs. Accordingly the availability of all discretionary DFG assistance will depend on funding being available through the BCF and the Council reserves the right not to approve any discretionary DFG application.

4 Next Steps

4.1 To amend the Private Sector Housing Assistance Policy to incorporate discretionary DFG assistance as detailed in paragraph 3.8 of this report.

4.2 As previously stated in this report, WSCC and the West Sussex District and Borough Councils have implemented a project to explore innovative new ways of delivering DFGs across the whole County. The project is considering the pooling resources (staff and budget) on a countywide basis to ensure effort is directed to areas of greatest need. At the conclusion of the project there are likely to be a number of recommendations aimed at improving the delivery of DFGs and associated assistance across the County. The implementation of these recommendations will require the agreement of WSCC and the District and Borough Councils and therefore any recommendations will be the subject of a further Cabinet report.

5 Outcome of Consultations

5.1 The proposed policy changes will be considered by the Housing and Public Protection Policy Development Advisory Group at its meeting on 20th November 2017 and their views will be reported at the meeting.

5.2 The Monitoring Officer advised that The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 gives Councils power to give discretionary assistance in addition to mandatory DFGs.

5.3 The Director of Corporate Resources advised that as the proposed discretionary assistance will be met from the additional funding provided by the Better Care Fund there will be no direct financial cost to the Council.

5.4 The discretionary DFG assistance detailed in this report was considered and agreed by the Working Group for the County wide project reviewing the delivery of DFGs.

6 Other Courses of Action Considered but Rejected

6.1 Not to extend the scope of discretionary DFG assistance. This would mean that the Council would not be making good use of the additional funding provided by the Better Care Fund.

7 Resource Consequences

- 7.1 As the proposed discretionary assistance will be met from the additional funding provided by the Better Care Fund there will be no direct financial cost to the Council.

8 Legal Consequences

- 8.1 The Regulatory Reform (Housing Assistance (England and Wales) Order 2002 enables Local Authorities to provide directly or indirectly assistance to any person for various purposes including those of enabling them to adapt or improve living accommodation or to repair living accommodation this can be by way of mandatory disabled facilities grants or discretionary disabled facilities grants. In order to provide such assistance, Councils have to have in place Policies for the provision of such assistance. Decisions on the grant of assistance will be taken in light of approved Council Policy.

9 Risk Assessment

- 9.1 The Council have a duty to provide Mandatory DFGs and therefore it is essential that sufficient budget from the Better Care Fund is retained to meet this statutory duty.

10 Other Considerations

- 10.1 Action under the proposed policy would be taken without discrimination and is designed to give equal consideration to people's needs.
- 10.2 The aim of these changes is to ensure that disabled people will receive a more responsive and tailored service.

Report to Cabinet

23rd November 2017

By the Cabinet Member for Housing and Public Protection

DECISION REQUIRED



**Horsham
District
Council**

Not Exempt

Implementation of the new provisions under the Housing and Planning Act 2016

Executive Summary

This report details the powers introduced by the Housing and Planning Act 2016 that relate to the Government's response to tackling rogue landlords and improving the private rental sector.

The Act introduced a range of measures that are intended to be implemented in 2017:

- Civil penalties of up to £30,000 as an alternative to prosecution for certain specified offences (came into force on 6 April 2017);
- Extension of Rent Repayment Orders to cover illegal eviction, breach of a Banning Order and certain other specified offences (came into force on 6 April 2017);
- Database of rogue landlords and property agents convicted of certain offences (scheduled to come into force on 1 October 2017);
- Banning Orders for the most serious and prolific offenders (scheduled to come into force on 1 October 2017).

This report is to advise Cabinet of the opportunity to impose civil penalties and Rent Repayment Orders for certain housing offences under the Housing and Planning Act 2016 and to determine a charging scheme for civil penalties.

Recommendations

That the Cabinet is recommended:

- i) to note and agree to the use of the enforcement powers under the Housing and Planning Act 2016
- ii) to adopt civil penalties for housing offences in appropriate circumstances,
- iii) to approve the charging scheme for civil penalties as set out in Appendix A,
- vi) to approve the updated Private Sector Housing Enforcement Policy as set out in Appendix B to include the use of civil penalties and rent repayment orders.

- v) to delegate authority to the Head of Environmental Health and Licensing in consultation with the Head of Legal and Democratic Services the power to issue Civil penalties and to agree the sum of civil penalties on a case by case basis in line with the approved Enforcement Policy and approved Charging Scheme

Reasons for Recommendations

- i) to ensure that the new powers are used to tackle the problem of rogue landlords.

Background Papers:

DCLG Guidance – April 2017 Civil penalties under the Housing and Planning Act 2017
DCLG Guidance - April 2017 Rent repayment Orders under the Housing and Planning Act 2017

Wards affected: All

Contact: John Batchelor, Head of Environmental Health and Licensing, Ext 5417

Background Information

1 Introduction and Background

- 1.1 The private rented sector is an important part of the housing market and in the Horsham District the private rented sector serves the housing needs of approximately 8% of our residents. The Council's Environmental Health and Licensing Department is responsible for ensuring good standards in this sector, protecting the health, safety and rights of tenants.
- 1.2 This report details the new provisions in the Housing and Planning Act 2016 designed to crack down on rogue landlords and the policies we are required to adopt to make full use of civil penalties and rent repayment orders.

2 Relevant Council policy

- 2.1 The Private Sector Housing Enforcement Policy contributes towards the District Priority: Support our Communities, making a fundamental contribution to the maintenance and improvement of public health, quality of life and wellbeing.

3 Details

- 3.1 The Housing and Planning Act 2016 introduced a range of measures to crack down on rogue landlords that are to be implemented in 2017:
 - Civil penalties of up to £30,000 as an alternative to prosecution for certain specified offences (came into force on 6 April 2017);
 - Extension of Rent Repayment Orders to cover illegal eviction, breach of a banning order and certain other specified offences (came into force on 6 April 2017);
 - Database of rogue landlords and property agents convicted of certain offences (was scheduled to come into force on 1 October 2017);
 - Banning Orders for the most serious and prolific offenders (was scheduled to come into force on 1 October 2017).

3.2 Civil Penalties

- 3.2.1 Non-compliance with certain Housing Act notices, regulations and licensing requirements can result in the local housing authority prosecuting the offender. Section 126 and Schedule 9 of the Housing and Planning Act 2016 now adds an alternative option of allowing a civil penalty to be imposed by the local housing authority for the following offences:
 - Failure to comply with an Improvement Notice; (Section 30)
 - Offences in relation to licensing of Houses in Multiple Occupation;(Section 72)
 - Offences in relation to licensing of houses under Part 3 of the Housing Act 2004;(Section 95)
 - Offences of contravention of an overcrowding notice;(Section 139)

- Failure to comply with management regulations in respect of Houses in Multiple Occupation.(Section 234)
- Breach of a Banning Order (Section 23)

3.2.2 The amount of the penalty is to be determined by the local housing authority with a maximum amount of £30,000. The Council must have regard to Guidance given by the Secretary of State about the exercise of its functions in relation to the issuing of civil penalties and local housing authorities are expected to develop and document their own policy on determining the appropriate level of civil penalty. Horsham District Council's proposed charging scheme is set out in Appendix A.

3.2.3 Income received from a civil penalty can be retained by the local housing authority provided that it is used to further the local housing authority's statutory functions in relation to their enforcement activities covering the private rented sector.

3.2.4 A civil penalty should not be seen as a lesser option compared to prosecution and to help ensure that the civil penalty is set at the appropriate level The Statutory Guidance requires a local housing authority to have regard to the following factors when deciding the appropriate level of penalty

- Severity of the offence
- Culpability and track record of the offender
- The harm caused to the tenant
- Punishment of the offender and to deter the offender from repeating the offence
- Deter others from committing similar offences
- Remove any financial benefit the offender may have obtained as a result of committing the offence.
- The Landlord/Letting agents assets and income

3.2.5 A civil penalty is an alternative to prosecution so a local housing authority is not permitted to impose a civil penalty and prosecute for the same offence. A civil penalty requires the same burden of proof as a prosecution, the evidence must meet the criminal standard of proof ie "beyond reasonable doubt". In considering the decision to prosecute or not, the Council must also consider is there is sufficient evidence for there to be a realistic prospect of conviction were it to go to court and if the prosecution is in the public interest.

3.2.6 Local housing authorities are also expected to develop and document their own policy on when to prosecute and when to issue a civil penalty and decide on which option on a case by case basis. The Private Sector Housing Enforcement Policy has been updated to include these details and is attached as Appendix B.

3.2.7 There is a prescribed process for levying civil penalties which must be followed precisely which is laid out in the Statutory Guidance. Recipients of a civil penalty have the right to appeal to the First-tier Tribunal where the soundness of the decision to impose a civil penalty, the decision relating to the amount and any deviations from the prescribed process can be rigorously reviewed. The Tribunal has the power to confirm, vary (increase or reduce) or cancel the civil penalty that the Council has issued

3.3 Rent Repayment Orders

- 3.3.1 The Housing Act 2004 introduced Rent Repayment Orders (RRO) to cover situations where the landlord of a property had failed to obtain a licence for a property that was required to be licensed, specifically offences in relation to licensing of Houses in Multiple Occupation.
- 3.3.2 A RRO enables a local housing authority or a tenant to make an application to the First-tier Tribunal to repay a specified amount of rent, up to a maximum of 12 months. An application can be made by a tenant where they pay the rent themselves or a local housing authority if the rent was paid through Housing Benefit or the housing element of Universal Credit.
- 3.3.3 With effect from 6th April 2017 the range of offences for which a RRO can be applied for cover the following situations:
- Failure to comply with an Improvement Notice;- Housing Act 2004
 - Failure to comply with a Prohibition Order; - Housing Act 2004
 - Illegal eviction or harassment of the occupiers of a property; Protection from Eviction Act 1977
 - Using violence to secure entry to a property; - Criminal Law Act 1977
 - Failure to licence or be licensed in respect of an HMO;- Housing Act 2004
 - Failure to licence or be licensed in respect of Selective Licensing Schemes; - Housing Act 2004
 - Breach of a Banning Order (to be introduced by the Housing and Planning Act 2016 currently not yet in force).
- 3.3.4 Similar to civil penalties a landlord does not have to be found guilty of an offence in order to apply for a RRO. But should there have been a successful prosecution the Tribunal will not revisit the facts of the case but only consider the appropriate amount for repayment. Applications for a RRO without a prosecution for a prescribed offence will require the local housing authority to meet the same burden of proof as would be expected by the courts. The Housing and Planning Act 2016 requires a local housing authority to consider an application for a RRO should it have secured a prosecution for a prescribed offence.
- 3.3.5 The Government has also issued Statutory Guidance on RRO's which the Council must have regard to, detailing the intention behind RROs and procedures for implementation. Local housing authorities are expected to develop and document their own policy on when to prosecute and when to apply for a Rent Repayment Order and should decide each case independently. The Private Sector Housing Enforcement Policy has been updated to include these details and is attached at Appendix B.
- 3.3.6 Income received from a RRO can be retained by the local housing authority provided that it is used to further the local housing authority's statutory functions in relation to their enforcement activities covering the private rented sector.

3.4 Banning Orders and Database of Rogue Landlords

- 3.4.1 The Housing and Planning Act 2016 also introduces a provision enabling local housing authorities to apply to the First-Tier Tribunal to serve a Banning Order preventing a landlord or property agent from letting properties. Such an application would be permitted as a result of a conviction for prescribed housing related offences. Banning Orders should be reserved for the worse offenders.
- 3.4.2 The range of Banning Order offences that have been proposed include; illegally evicting or harassing tenants, failure to comply with Housing Act improvement notices, gas safety offences, and letting to someone who is disqualified from renting because of their immigration status. Banning orders were due to be introduced from October 2017 for residential lettings and will be recorded on a national database of rogue landlords (which the Government are going to establish) which local housing authorities will be obliged to update. Both these provisions are currently not yet in force.

4 Next Steps

- 4.1 The Cabinet are recommended to approve the updated Private Sector Housing Enforcement Policy as set out in Appendix B to include the use of civil penalties and rent repayment orders, and to approve the charging scheme for civil penalties as set out in Appendix A.

5 Views of the Policy Development Advisory Group and Outcome of Consultations

- 5.1 The proposed policy changes will be considered by the Housing and Public Protection Policy Development Advisory Group at its meeting on 20 November 2017. Their comments will be reported at the meeting.
- 5.2 The Director of Corporate Resources and the Monitoring Officer's comments are incorporated in the report.

6 Other Courses of Action Considered but Rejected

- 6.1 The Government have made it very clear that they expect local housing authorities to use the new powers provided in the Housing and Planning Act 2016 robustly as a way of clamping down on rogue landlords, therefore not to do so was rejected.

7 Resource Consequences

- 7.1 Income received from civil penalties and RRO can be retained by the local housing authority provided that it is used to further the local housing authority's statutory functions in relation to their enforcement activities covering the private rented sector.
- 7.2 As civil penalties are an alternative to prosecution with the same burden of proof they should not create additional workload. It is likely that landlords receiving a civil penalty may appeal to the First-Tier Tribunal so there may be some additional administration. Whilst it is not expected that the Council will need to apply for many

RRO there will be additional administration with this process. In all case support from Legal Services will be required.

8 Legal Consequences

- 8.1 Section 126 of the Housing and Planning Act 2016 allows civil penalties to be imposed as an alternative to prosecution for certain offences as set out in Schedule 9 of the Act. Schedule 9 in turn amends the Housing Act 2004 including providing a new Section 249A which deals with civil penalties as an alternative to prosecution.
- 8.2 The Council has a statutory duty as a Local Housing Authority to enforce relevant Housing Legislation
- 8.3 The Housing Act 2004 introduced RRO to cover situations where the landlord of a property had failed to obtain a licence for a property that was required to be licensed, specifically offences in relation to licensing of Houses in Multiple Occupation. RRO have now been extended through the Housing and Planning Act 2016 to cover a much wider range of offences.

9 Risk Assessment

- 9.1 No risks have been identified from the recommendations contained in this report

10 Other Considerations

- 10.1 The new powers introduced by the Housing and Planning Act 2016 are intended to provide a significant incentive to landlords to comply with their legal obligations. The adoption of the new powers should mean that landlords comply more quickly and/or proactively in order to avoid financial and other penalties, which should result in less private tenants being exposed to housing conditions that have an adverse health impact.

**CHARGING POLICY FOR DETERMINING THE LEVEL OF CIVIL PENALTIES IMPOSED
UNDER THE HOUSING AND PLANNING ACT 2016**

1.0 Factors taken into account when deciding the level of civil penalty

- 1.1 Local housing authorities have the power to impose a civil penalty of up to £30,000. The Government would expect the maximum amount to be reserved for the very worst offenders. The actual amount levied in any particular case should reflect the severity of the offence, as well as taking account of the landlord's previous record of offending.
- 1.2 In order to ensure that any civil penalty is set at an appropriate level the Council shall consider the following factors:
- **Severity of the offence.** The more serious the offence, the higher the penalty should be.
 - **Culpability and track record of the offender.** A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities. Landlords are running a business and should be expected to be aware of their legal obligations.
 - **The harm caused to the tenant.** This is a very important factor when determining the level of penalty. The greater the harm or the potential for harm (this may be as perceived by the tenant), the higher the amount should be when imposing a civil penalty.
 - **Punishment of the offender.** A civil penalty should not be regarded as an easy or lesser option compared to prosecution. While the penalty should be proportionate and reflect both the severity of the offence and whether there is a pattern of previous offending, it is important that it is set at a high enough level to help ensure that it has a real economic impact on the offender and demonstrates the consequences of not complying with their responsibilities.
 - **Deter the offender from repeating the offence.** The ultimate goal is to prevent any further offending and help ensure that the landlord fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a high enough level such that it is likely to deter the offender from repeating the offence.
 - **Deter others from committing similar offences.** While the fact that someone has received a civil penalty will not be in the public domain, it is possible that other landlords in the local area will become aware through informal channels when someone has received a civil penalty. An important part of deterrence is the realisation that the local housing authority is proactive in levying civil penalties where the need to do so exists and that the level of civil penalty will be set at a high enough level to both punish the offender and deter repeat offending.
 - **Remove any financial benefit the offender may have obtained as a result of committing the offence.** The guiding principle here should be to ensure that the offender does not benefit as a result of committing an offence, i.e. it should not be cheaper to offend than to ensure a property is well maintained and properly managed.

2.0 Civil Penalties Matrix

- 2.1 The level of any civil penalty should take into account the Council's cost of investigating, determining and applying a civil penalty as well as including a punitive charge.
- 2.2 The table below based on culpability and harm will be used as a starting point for determining, on a case by case basis, the level of civil penalty that should be imposed:

		CULPABILITY		
		Low Culpability	Negligent	Deliberate
H A R M	Moderate	£2,000	£4,000	£6,000
	Serious	£4,000	£8,000	£16,000
	Severe	£8,000	£16,000	£30,000

- 2.3 In determining culpability regard should be had to the following:
- **Deliberate** – An intentional breach by a landlord or property agent or a flagrant disregard for the law.
 - **Negligent** – The failure of the landlord or property agent to take reasonable care to put in place proper systems for avoiding the offence.
 - **Low culpability** – The offence committed has some fault on the part of the landlord or property agent but there are other circumstances which have led to the offence.
- 2.4 In determining harm regard should be had to the following:
- **Severe** – A severe and substantial risk, including imminent risk, to the health and safety of the occupiers and/or community, with potential life threatening results.
 - **Serious** - A serious risk to the health and safety of the occupiers and/or immediate neighbours, leading to a potential serious injury or disease requiring treatment and/or hospital admission.
 - **Moderate** – A moderate risk which is still significant enough to warrant medical attention.
- 2.5 In order to ensure that a civil penalty is set at an appropriate level, the Council will have regard to the Civil Penalty Matrix and consider each case against the factors identified in the statutory guidance and detailed in paragraph 1.2 above. Aggravating factors in a case will increase the level of penalty and, equally any mitigating factors will reduce the level of penalty.

3.0 Discounts

- 3.1 The Council will apply the following discounts to any imposed civil penalties in the following circumstances:
- In the event that the offender complied with the identified breach within the representation period at the 'notice of Intent' stage, the Council would normally reduce the level of any imposed civil penalty by 20%
 - An early payment discount of 20% of the civil penalty will be applied should the payment be made within 14 days from the date of the 'final notice'. This discount would be in addition to any reduction applied as a result of compliance at the 'notice of intent' stage.

4.0 Procedure and Appeals

- 4.1 The procedure for imposing a civil penalty is set out at Schedule 13A of the Housing Act 2004 and summarised in the DCLG guidance. There is no scope for the Council to deviate from this procedure.
- 4.2 Before imposing a civil penalty the Council must give the person a notice of its proposal (notice of intent) to impose a civil penalty.
- 4.3 A person who is given a notice of intent may make written representations to the Council within 28 days about the proposal to impose the civil penalty. Any representations to the civil penalty charge will be considered by the Head of Environmental Health and Licensing and all representations will be considered on their own merit.
- 4.4 After the end of the period for representations, if the Council decides to impose a civil penalty, it must give the person a notice (a Final notice) imposing the penalty.
- 4.5 A person receiving a final notice of a civil penalty may appeal to the First-tier Tribunal against the decision to impose a penalty or the penalty amount. The appeal has the effect of suspending the notice and requirement to pay until determined.

5.0 Non-payment of civil penalty

- 5.1 Where a person fails to pay a civil penalty, the Council will pursue non-payment of the penalty through a Court Order process.

PRIVATE SECTOR HOUSING ENFORCEMENT POLICY

1.0 Introduction

1.1 The Private Sector Housing Service is responsible for enforcing a wide range of statutory provisions relating to housing and environmental conditions affecting health and safety.

1.2 The objectives of the service are to:

- Improve the standards of homes in the private sector
- To assess local housing conditions
- To reduce the number of properties with serious risks to health and safety
- To improve standards in private rented accommodation
- To improve the standards in HMOs (houses in multiple occupation)
- To work closely with private sector landlords towards improving conditions and the standard of management of private rented housing
- To provide an excellent service that is accessible to anyone living in the private sector who may have poor living conditions

1.3 The Private Sector Housing service works **reactively** and **proactively**.

Reactively the service will respond to:

- Private sector tenants who contact the Council with complaints about disrepair or poor conditions within their home.
- Complaints about properties that may be causing problems for neighbouring properties.
- Enquiries from owner occupiers or private tenants and landlords who would like advice about housing conditions.
- Enquiries for advice about the legal minimum housing standards, particularly HMOs (houses in multiple occupation)

Proactively the service will:

- Operate a programme of inspections of higher risk HMOs

1.4 In exercising their duties and other functions, officers will seek to do so in a firm but fair, open and consistent and helpful way. Any enforcement action will be compliant with relevant legislation and guidelines in line with the principles of good enforcement.

1.5 This policy deals with the practical application of enforcement procedures that will be used to achieve statutory housing and environmental standards. It sets out what owners, landlords, their agents and tenants of private sector properties can expect from officers.

1.6 Enforcement, in the context of this policy is not limited to formal enforcement action such as prosecution, but includes for example, the inspection of premises for the purpose of checking compliance with legislation and the provision of advice.

1.7 This policy seeks to support the Council's corporate aims, objectives and strategies with respect to private sector housing and has to read in conjunction with the Council's General Enforcement Policy for Environmental Health and Licensing and the Council's Private Sector Housing Renewal Policy.

2.0 Principles of Good Enforcement

2.1 The aim of the policy is to ensure that all enforcement actions comply with the following principles:

Consistency
Proportionality
Openness

2.2 **Consistency** means taking a similar approach in similar circumstances to achieve similar ends. It does not mean uniformity, as officers will take into account many factors such as the level of risk, the history of compliance and the attitude and actions of those involved.

2.3 **Proportionality** means relating enforcement action to the risks and severity of the breach of the law involved. This will ensure that the most serious risks are targeted first.

2.4 **Openness** means explaining our actions clearly in plain language and discussing compliance failures or problems with anyone experiencing difficulties. A clear distinction will be made between legal requirements (what must be done) and advice or guidance (what is desirable)

3.0 Legislation

3.1 This section lists the legislation commonly enforced by the private sector housing service and outlines the provisions. It is not an exhaustive list and is not a full statement of the law – it is simply a summary.

3.2 The Housing Act 2004 introduced the Housing Health & Safety Rating System (HHSRS), a method of assessing and categorising hazards to health. The categories are summarised below:

HHSRS	Band	Severity	Response
Category 1 hazard	A	Serious hazards	The Council has a duty to take enforcement action.
	B		
	C		
Category 2 hazard	D	Less serious hazards	The Council has discretion to take action
	E		
	F		
	G		
	H		
	I		
	J		

The Council has a range of enforcement options to address hazards that exist in residential premises as follows:

Action	Category of hazard where action appropriate	
	Category 1	Category 2
No action	No	Yes
Hazard awareness notice	Yes	Yes
Improvement notice	Yes	Yes
Prohibition order	Yes	Yes
Emergency remedial action	Yes	No
Emergency prohibition order	Yes	No
Demolition order	Yes	No
Clearance area	Yes	No

3.3 Houses in Multiple Occupation (HMOs)

In addition to the previously mentioned enforcement options the Council has further powers to ensure adequate standards in HMOs are met and maintained.

The Housing Act 2004 introduced a mandatory scheme to licence HMOs. Licensing is intended to apply only to larger high risk HMOs of 3 or more stories occupied by 5 or more people, comprising 2 or more households.

The HMO licensing regime provides procedures to assess the fitness of a person to be a licence holder, potential management arrangements of the premises and suitability of the property for the number of occupants, including the provision of relevant and adequate equipment and facilities at the property.

It is a criminal offence if a person controlling or managing a HMO does not have the required licence. Breaking any condition of a licence is also an offence.

All HMOs, regardless of whether they are licensable or not, are subject to legislation about how they are managed and must comply with the requirements of the Management of Houses in Multiple Occupation Regulations 2006.

3.4 Empty Properties

The Housing Act 2004 introduces Empty Dwelling Management Orders (EDMO) in order to unlock the potential of empty houses and to get them back into use as houses as quickly as possible. EDMOs are designed as a backup to voluntary leasing arrangements and an alternative to enforcement action under other legislation.

There are two types of order, Interim EDMO and Final EDMO. EDMOs allow the Council to secure the occupation and proper management of privately owned houses and flats that have been unoccupied for a specified period (at least six months).

3.5 Caravan Sites

The Use of land as a caravan site usually requires a caravan site licence under the Caravan Sites and Control of Development Act 1960 and the Council may impose site licence conditions. The Council has adopted conditions based on the current model standards. The Council is able to take enforcement action, by way of Compliance Notices, should a site be operating without a licence or where site licence conditions are not being met.

3.6 Other Legislative Provisions

The Private Sector Housing Service is also responsible for enforcing the provision of other legislation including Public Health Acts 1936 and 1961, Building Act 1984, Environmental Protection Act 1990, The Smoke and Carbon Monoxide Alarm (England) Regulations 2015 and the Letting Agents Redress Scheme.

3.7 Power to Charge for Enforcement Action

Section 49 of the Housing Act 2004 allows the Council to make a reasonable charge as a means of recovering expenses incurred in taking enforcement action. The expenses are in connection with the inspection of the premises, subsequent consideration of any action to be taken, and the service of notices.

The Council will recover costs when formal action is taken i.e. the service of Housing Act Notices, where it is reasonable to expect the owner to pay the charges. The full cost of an officer's time including overheads and any relevant expenses will be charged. There is discretion to waive the charge when it is not reasonable to expect a person to pay the charges for enforcement.

Landlords seeking to comply with the law will not be charged for enforcement action whilst bad landlords will be charged.

Where charges for enforcement action are levied they can be registered as a local land charge against the property.

The Council will also recover costs when formal action is taken i.e. the service of Compliance Notices, under the Caravan Sites and Control of Development Act 1960, where it is reasonable to expect the owner to pay the charges. The full cost of an officer's time including overheads and any

relevant expenses will be charged. There is discretion to waive the charge when it is not reasonable to expect a person to pay the charges for enforcement.

4.0 Enforcement

4.1 The actions available to the Private Sector Housing Service to improve the standards of private sector housing are broadly divided into two categories:

Informal action - Informal action will include verbal advice given by Officers, and advisory letters. The Private Sector Housing Services is very willing to offer help and advice and will explain the reasons for the Council's involvement and what should be done to improve the particular housing conditions. The preferred approach is to work with people to help to prevent the need for formal enforcement.

Formal action - Formal action normally involves the service of enforcement notices. Most notices served by the Private Sector Housing Service require the recipient of the notice to commence and complete specified works within specified time limits. All notices are accompanied by notes that explain the effect of the notice and the recipient's right of appeal. Officers will always be willing to discuss the works specified in the notice and the reason for the service of the notice.

4.2 Private Sector Housing Officers are authorised to operate the service according to this policy and prepare enforcement work on behalf of the Council. Authorisation to approve enforcement action is delegated by the Council to the Head of Environmental Health and Licensing.

4.3 Sanctions

In all case where an offence is committed the Council has various sanctions it can impose.

4.3.1 Penalty Charge Notices

Under some legislation, the Council can serve a Penalty Charge Notice. These are:

The Redress Schemes for lettings Agency work and Property management Work (Requirement to Belong to a Scheme etc.) (England) Order 2014

Under the redress scheme the penalty charge will normally be £5,000 for any contravention but on representation this charge may be reduced or in exceptional cases be quashed. Government guidance has been provided on reasons to reduce the penalty charge which includes taking account of turnover of the business or other extenuating circumstances. This charge amount is in accordance with "Guidance on the Redress Scheme Improving Rented Sector" issued in March 2015 by DCLG.

The landlord can request the local authority to review the penalty charge. A final appeal can be made by the landlord to the First-tier Tribunal.

The Smoke and Carbon Monoxide Alarm (England) Regulations 2015

Under these regulations, a penalty charge of up to £5,000 can be made. Regulation 13 requires a local Housing Authority to prepare and publish a statement of principles which it proposes to follow in determining the amount of penalty charge. Appendix 1 details the Councils Statement of Principles in this matter.

4.3.2 Civil Penalties

The Council may serve notices imposing Civil Penalties as an alternative to prosecution in respect of the following offences:

- Failure to comply with an Improvement Notice
- Failure to licence or other licensing offences relating to Houses in Multiple Occupation (HMOs)
- Failure to comply with an Overcrowding Notice
- Failure to comply with a regulation in respect of an HMO

- Breaching a Banning Order

The local housing authority should determine the amount of penalty which can be up to a maximum of £30,000. The table and notes in Appendix 2 sets out the charging system and the matters which are to taken into consideration when setting the level of a civil penalty.

4.3.3 **Prosecution**

Non-compliance with legislation and regulations enforced by the Private Sector Housing Service is generally a criminal offence. The Council is the prosecuting authority for such offences and as they are criminal in nature, proceedings are normally taken in the Magistrates Court.

4.3.4 **Rent Repayment Orders**

A rent repayment order is an order made by the First-tier Tribunal requiring a landlord to repay a specified amount of rent. Rent repayment orders can be applied to a wide range of offences and where an offence to which a rent repayment order relates has been committed the local authority will consider applying for a rent repayment order on each case independently. The Council must consider applying for a rent repayment order where a landlord has been convicted of an offence for which a rent repayment order can applied for.

4.3.5 **Works in Default**

Work in default is a power given to the Council, to ensure work is carried out to a property. If the recipient of the Notice does not do the work required by the Notice, the Council may employ a contractor to enter the property and carry out the work itself. The Council will charge the appropriate person for the cost of the works together with the costs involved in arranging for the work to be done.

It should be noted that carrying out the work in default does not exclude the Council from taking other formal action. The Council is entitled to ensure that the work is carried out and to consider if it is appropriate to take further action.

4.4 **Shared Enforcement Responsibility**

In circumstances where enforcement responsibility is shared between enforcement agencies, the Private Sector Housing Service will have regard to procedures agreed with other enforcement agencies, particularly where memoranda of understanding exists.

In some cases, enforcement powers will rest with another agency (for example the Health and Safety Executive has responsibility for enforcement of gas safety in domestic property). In these situations, the Private Sector Housing Section will act to ensure that the case is transferred to the enforcing agency promptly and in accordance with any agreed procedures.

5.0 **Taking Action and Imposing Sanctions**

The decision to take informal or formal action will be made by the officer in charge of the case.

5.1 **When we will take Enforcement Action**

Notices are served when there is no alternative and when all other reasonable attempts have been made to achieve the necessary action voluntarily.

In determining whether or not to serve a notice each case is looked at individually and the following factors are taken into account:

- Whether an informal approach such as a letter informing the landlord of the defects and asking them to confirm their intentions within a set timescale is appropriate.
- The significance of the hazards.
- The extent and location of the hazards.
- Whether the Council is under a duty or has a power to take formal action in respect of the hazards identified.

- The level of risk posed to the occupiers, including whether there is an imminent risk of serious harm
- The views and intentions of the occupiers.
- The views and intentions of the owners.
- The compliance record of the person in control of the premises.
- Whether the chosen option is practical, reasonable and proportionate in reducing the hazards to an acceptable level.
- The physical impact on adjoining buildings.
- The longer term viability of the premises.
- The impact on the local community and on the appearance of the local area.
- Whether the tenant will be protected from retaliatory eviction.

5.2 When will sanctions be imposed?

In all cases where an offence is committed, consideration will be given as to whether a sanction should be imposed and if so, which one. In some cases it may be appropriate to impose two sanctions for example, prosecution and an application for a rent repayment order.

In deciding whether to pursue sanction, the initial decision will be made by the officer in charge of the case in consultation with the Head of Environmental Health and Licensing. Having prepared the case and collected the evidence, officers will then consult the Council's Legal Section to discuss the merit of the action proposed.

5.3 Civil Penalties or Prosecution

Each case is unique and must be considered on its own facts. However, there are general principles that apply to the way in which Officers decide whether an action should be applied and if so which one.

There are two overarching tests used in determining whether to impose a sanction. These are the evidential test and the public interest test.

The Evidential Test - Private Sector Housing Officers must be satisfied that there is enough evidence to provide a realistic prospect of conviction. This is an objective test and means that a court is more likely than not to convict the offender of the charge alleged.

The Public Interest Test - If the evidential requirements are met, Officers must then consider whether the public interest requires a prosecution. It is not the case that Officers will prosecute simply because an offence has been committed. There should generally be a public interest in bringing such an offence to Court.

- 5.3.1 Whenever the authority believes a Housing Act 2004 offence has been committed and the evidence passes the evidential stage and the public interest stage it will then be necessary to consider on a case by case basis if instigating prosecution proceedings or imposing a civil penalty is the best approach. If the Council believes that it has a reasonable prospect of a conviction in a particular case it will always consider a civil penalty in the first instance.

Factors to consider will include:

- The seriousness of the offence, history of compliance, culpability and the harm caused.
- Whether a civil penalty is likely to be sufficient to change the behaviour of the offender.
- Whether the offender has a large portfolio of properties potentially putting many tenants at risk if they continue to operate with poor practices.
- Information from partner agencies e.g. Police and West Sussex Fire and Rescue Service.
- Is publicity likely to act as a deterrent to others, a prosecution is in the public domain whereas a civil penalty is not.
- Which option will be the best deterrent to prevent further offences,
- Whether the tenant or council is also considering applying for a Rent Repayment Order.

Examples of situations in which a decision to prosecute may be the most appropriate option include; for what are judged to be particularly serious offences and where the offender has committed similar

offences in the past. However, that does not mean civil penalties should not be used where serious offences have been committed and each case will be considered on an individual basis.

5.4 **Work in Default**

When determining if work in default is appropriate, officers will consider the following, this is not an exhaustive list and other factors may be taken into account:

- The reason for non-compliance to the original Notice,
- The effects of not carrying out the work on the health and safety of the occupant of the property concerned,
- The reason for the work not being carried out in the first place.

6.0 **Service Complaints**

6.1 If you feel the Council has not acted in accordance with this policy please contact:

The Head of Environmental Health and Licensing
Horsham District Council
Parkside
Horsham
West Sussex RH12 1RL
E-mail: publichealth.licensing.gov.uk
Telephone: 01403 215405

If you are dissatisfied with the response you can pursue your complaint through the internal complaints procedure

7.0 **Policy Review**

7.1 The policy will be reviewed regularly by the Head of Environmental Health and Licensing to ensure it continues to meet the principles of good enforcement.

Statement of principles for determining the amount of a penalty charge for breaches of The Smoke and Carbon Monoxide Alarm (England) Regulations 2015

INTRODUCTION

1. Regulation 13 of the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 ('the Regulations') requires local housing authorities such as Horsham District Council ('the Council') to prepare and publish a statement of principles which it proposes to follow in determining the amount of a penalty charge.
2. This statement of principles sets out the principles that the Council will apply in exercising its powers to require a relevant landlord ('landlord') to pay a financial penalty for a failure to comply with requirement of a remedial notice ('the Notice') served under Regulation 5 of the Regulations.

FINANCIAL PENALTY CHARGES

3. In accordance to Regulation 8, where the Council is satisfied that on the balance of probabilities that the landlord on whom it has served a remedial notice ('the Notice') under Regulation 5 has failed to take the remedial action specified in the Notice within the period specified, the Council may require the landlord to pay a penalty charge of such amount as the authority has determined.
4. In deciding whether it would be appropriate to impose a penalty charge, the Council will take full account of the particular facts and circumstances of the breach under consideration, such as evidence of the breach of the requirement of the Notice.
5. Before imposing a requirement on a landlord to pay a penalty charge, the Council must, within a period of six weeks from the point at which it is satisfied that the landlord has failed to comply with the requirements of the Notice, serve a penalty charge notice in accordance with Regulation 9 setting-out:
 - the reasons for imposing the penalty charge;
 - the premises to which the penalty charge relates;
 - the number and type of prescribed alarms (if any) which an authorised person has installed at the premises;
 - the amount of the penalty charge;
 - that the person responsible for the breach is required, within a period specified in the notice –
 - to pay the penalty charge, or
 - to give written notice to the local housing authority that the offender wishes the authority to review the penalty charge notice;
 - how payment of the penalty charge must be made;
 - the person to whom, and the address (including if appropriate any email address) at which, a notice requesting a review may be sent and to which any representations relating to the review may be addressed; and
 - any other information as required by the regulations that have been breached.
6. Under Regulation 8(2) the amount of the penalty charge must not exceed £5,000.

7. For a first offence, the Council will impose a penalty charge of £2,500 and an early payment (within 14 days of the penalty charge notice with the day on which the penalty charge notice is served) will be reduced by 50% making £1,250 payable.
8. For subsequent offences the penalty will be £5,000 to deter continued non-compliance and an early payment will attract a discount of 50% making £2,500 payable

REVIEW OF PENALTY CHARGE NOTICE

9. Should the Council receive a request from the landlord for the review of a penalty charge within 28 days (beginning with the day on which the penalty charge notice is served), a review shall be undertaken by the Head of Environmental Health and Licensing and the Head of Legal and Democratic Services. They will review the penalty charge and take into account all representations made. All representations will be considered on their own merits; in particular, the following may be considered relevant in deciding any reduction in the charge made:
 - Internal failed preventative measures – in cases of national agents / landlords / businesses where due to internal processes failing local office has breached regulations.
 - Good attitude and cooperation with the Council – in cases where the landlord has cooperated fully with the Council in investigating the breach of the regulations.
 - Immediate and voluntary remediation – when the offence was brought to the attention of the landlord they immediately rectified any breach of the regulations.
 - No previous history of non-compliance with other housing legislation – if this is a first breach of any housing related legislation.
 - Any relevant personal circumstances.
 - Undue financial hardship – if the fine would cause the offender undue financial hardship such that it might not be able to continue to operate.
10. In conducting the review, the Council will consider any representations made by the landlord, and serve notice of its decision whether it confirms, varies or withdraws the penalty charge notice issued to the landlord.
11. The notice of the review decision will also state the landlord's right of appeal

APPEALS

12. A landlord who, having requested a review of a penalty charge notice is served with a notice confirming or varying the penalty charge may appeal to the First-tier Tribunal against the Council's decision.
13. When any review determines a final amount of penalty and this is not paid the Council will pursue non-payment of the penalty charge on the order of a court, as if payable under a court order.

VALIDITY OF THIS POLICY

14. The Council may revise its statement of principles and, where it does so, it must publish the revised statement.

**CHARGING POLICY FOR DETERMINING THE LEVEL OF CIVIL PENALTIES IMPOSED
UNDER THE HOUSING AND PLANNING ACT 2016**

1.0 Factors taken into account when deciding the level of civil penalty

1.1 Local housing authorities have the power to impose a civil penalty of up to £30,000. The Government would expect the maximum amount to be reserved for the very worst offenders. The actual amount levied in any particular case should reflect the severity of the offence, as well as taking account of the landlord's previous record of offending.

1.2 In order to ensure that any civil penalty is set at an appropriate level the Council shall consider the following factors:

- **Severity of the offence.** The more serious the offence, the higher the penalty should be.
- **Culpability and track record of the offender.** A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities. Landlords are running a business and should be expected to be aware of their legal obligations.
- **The harm caused to the tenant.** This is a very important factor when determining the level of penalty. The greater the harm or the potential for harm (this may be as perceived by the tenant), the higher the amount should be when imposing a civil penalty.
- **Punishment of the offender.** A civil penalty should not be regarded as an easy or lesser option compared to prosecution. While the penalty should be proportionate and reflect both the severity of the offence and whether there is a pattern of previous offending, it is important that it is set at a high enough level to help ensure that it has a real economic impact on the offender and demonstrates the consequences of not complying with their responsibilities.
- **Deter the offender from repeating the offence.** The ultimate goal is to prevent any further offending and help ensure that the landlord fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a high enough level such that it is likely to deter the offender from repeating the offence.
- **Deter others from committing similar offences.** While the fact that someone has received a civil penalty will not be in the public domain, it is possible that other landlords in the local area will become aware through informal channels when someone has received a civil penalty. An important part of deterrence is the realisation that the local housing authority is proactive in levying civil penalties where the need to do so exists and that the level of civil penalty will be set at a high enough level to both punish the offender and deter repeat offending.
- **Remove any financial benefit the offender may have obtained as a result of committing the offence.** The guiding principle here should be to ensure that the offender does not benefit as a result of committing an offence, i.e. it should not be cheaper to offend than to ensure a property is well maintained and properly managed.

2.0 Civil Penalties Matrix

- 2.1 The level of any civil penalty should take into account the Council's cost of investigating, determining and applying a civil penalty as well as including a punitive charge.
- 2.2 The table below based on culpability and harm will be used as a starting point for determining, on a case by case basis, the level of civil penalty that should be imposed:

		CULPABILITY		
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	Severe	£8,000	£16,000	£30,000

- 2.3 In determining culpability regard should be had to the following:
- **Deliberate** – An intentional breach by a landlord or property agent or a flagrant disregard for the law.
 - **Negligent**– The failure of the landlord or property agent to take reasonable care to put in place proper systems for avoiding the offence.
 - **Low culpability** – The offence committed has some fault on the part of the landlord or property agent but there are other circumstances which have led to the offence.
- 2.4 In determining harm regard should be had to the following:
- **Severe** – A severe and substantial risk, including imminent risk, to the health and safety of the occupiers and/or community, with potential life threatening results.
 - **Serious** - A serious risk to the health and safety of the occupiers and/or immediate neighbours, leading to a potential serious injury or disease requiring treatment and/or hospital admission.
 - **Moderate** – A moderate risk which is still significant enough to warrant medical attention.
- 2.5 In order to ensure that a civil penalty is set at an appropriate level, the Council will have regard to the Civil Penalty Matrix and consider each case against the factors identified in the statutory guidance and detailed in paragraph 1.2 above. Aggravating factors in a case will increase the level of penalty and, equally any mitigating factors will reduce the level of penalty.

3.0 Discounts

- 3.1 The Council will apply the following discounts to any imposed civil penalties in the following circumstances:
- In the event that the offender complied with the identified breach within the representation period at the 'notice of intent' stage, the Council would normally reduce the level of any imposed civil penalty by 20%
 - An early payment discount of 20% of the civil penalty will be applied should the payment be made within 14 days from the date of the 'final notice'. This discount would be in addition to any reduction applied as a result of compliance at the 'notice of intent' stage.

4.0 Procedure and Appeals

- 4.1 The procedure for imposing a civil penalty is set out at Schedule 13A of the Housing Act 2004 and summarised in the DCLG guidance. There is no scope for the Council to deviate from this procedure.
- 4.2 Before imposing a civil penalty the Council must give the person a notice of its proposal (notice of intent) to impose a civil penalty.
- 4.3 A person who is given a notice of intent may make written representations to the Council within 28 days about the proposal to impose the civil penalty. Any representations to the civil penalty charge will be considered by the Head of Environmental Health and Licensing and all representations will be considered on their own merit.
- 4.4 After the end of the period for representations, if the Council decides to impose a civil penalty, it must give the person a notice (a final notice) imposing that penalty.
- 4.5 A person receiving a final notice of a civil penalty may appeal to the First-tier Tribunal against the decision to impose a penalty or the penalty amount. The appeal has the effect of suspending the notice and requirement to pay until determined.

5.0 Non-payment of civil penalty

- 5.1 Where a person fails to pay a civil penalty, the Council will pursue non-payment of the penalty through a Court Order process.

Report to Cabinet

23rd November 2017

By the Cabinet Member for Waste, Recycling and
Cleansing

DECISION REQUIRED



Exempt Appendix A under paragraph 3 of Part 1 of
Schedule 12A to the Local Government Act 1972

Sussex and Surrey Joint Fuel Procurement e-auction

Executive Summary

Horsham District Council requires diesel as its main form of fuel for the fleet of vehicles serving a number of departments. The purpose of this report is to ask Cabinet to approve the preferred bidder for the supply of diesel based on the most competitive fixed rate surcharge for supply of diesel for the next 2 years.

The current contract for supply of diesel had not been reviewed for a number of years and therefore it has been necessary to undertake an exercise to obtain diesel at the most competitive price balanced against quality and the ability to supply. Whilst the overall saving achieved is relatively small over the 2 year period, the proposal to award the fuel supply contract is covered under key decisions given the total value of the contract and the impact which affects every ward across the district.

In order to achieve best value a reverse electronic auction (e-auction) managed by Crown Commercial Services (CCS) was conducted on behalf of the Sussex and Surrey Joint Procurement Partnership which Horsham District Council benefited from. The joint procurement exercise included a number of essential service providers such as the Sussex and Surrey emergency services. This helped provide the associated economies of scale.

The e-auction allowed suppliers to compete with each other during the auction reducing their supplier surcharge which is applied for the supply of fuel. The auction also allowed suppliers to make multiple offers rather than the traditional tendering exercise which limits opportunity to one final unit price which includes a supply surcharge. The use of reverse e-auctions with multiple bid options therefore promotes cost savings. The base price of fuel is of course variable as a commodity however what is negotiable is the margin made by the supplier which has now been fixed dependant on volume required as a whole.

In 2018/19 with a new fuel efficient fleet we estimate the annual fuel purchase to be around 500,000 litres of diesel saving approximately £4,500 per annum however this is subject to a varying base fuel rate. The e-auction submission has been evaluated accordingly. Key considerations of the auction exercise included: overall unit cost per litre, quality of product and the ability to supply fuel in a timely manner to meet demand.

Recommendations

That Cabinet is recommended to accept the bid and award the supply contract to Company A (exempt appendix A), as the preferred supplier of diesel for the next 2 years.

Reasons for Recommendations

- i) The e-auction offers a preferential overall cost per litre for fuel based on given volumes within a partnership using our current supplier with fixed margins applied to supply diesel from current supplier Company A.

Background Papers - None

Wards affected: All wards affected

Contact: Mark Neal (Transport Manager) 01403739381

Background Information

1 Introduction and Background

- 1.1 The purpose of this report is to seek the approval to award the contract for the supply of fuel for the next 2 years with fixed supplier surcharges.
- 1.2 The new contract will be at a lower price than the existing contract which means a cost saving over the 2 year period based on overall price per litre against total fuel use per annum.

2 Relevant Council policy

- 2.1 Efficiency – providing value for money services by securing the best price per litre for diesel to power the council's fleet of vehicles.

3 Details

- 3.1 The current contract for the supply of diesel has not been reviewed for a number of years and therefore it has been necessary to undertake an exercise to obtain fuel at the most competitive price, balanced against quality and the ability to supply.
- 3.2 A reverse e auction has been conducted through a framework agreement managed by CCS and the submission has been evaluated accordingly. Key considerations of the exercise included regulatory compliance, base unit costs per litre, plus supplier and framework supplier margins along with the ability to supply in a timely manner to meet local demand.
- 3.3 From the procurement exercise undertaken, Tender Company A has emerged as the Preferred Bidder. The preferred Bidder submitted the lowest supplier profit margin per litre on fuel which includes transport and delivery costs for diesel to Hop Oast Depot. The margin is £0.0181 per litre.
- 3.4 In addition to the fuel supplier mark up the framework provider, CCS also adds on a surcharge of £0.0020 per litre which gives a total surcharge supply price of £0.020 giving a total of £0.02p.
- 3.5 The existing fuel supply contract is based on market price, which has been on average £0.94p per litre for the last year. Making use of economies of scale the new contract allows the fuel provider to buy the fuel at a lower price. Once supplier margins have been added we would still see a saving of 0.088p per litre. The anticipated fuel usage with the new fleet is around 500,000 litres per annum therefore creating a saving of approximately £4,500 per annum.

4 Next Steps

- 4.1 If agreed by Cabinet, we wish to enter into a new contract using the preferred bidder for 2 years.
- 4.2 The contract needs to be awarded formally to Company A based on the e-auction submission.

5 Views of the Policy Development Advisory Group and Outcome of Consultations

- 5.1 The Waste & Recycling Policy and Advisory Group supported the proposals and recommendations within the report discussed at the meeting held on November 10th 2017
- 5.2 The Councils Monitoring Officer and Director of Corporate Resources have been consulted and their comments have been incorporated in to this report.

6 Other Courses of Action Considered but Rejected

- 6.1 The Council could continue to purchase diesel at a higher unit cost and incur greater costs.
- 6.2 There were other suppliers who participated in the e-auction which elicited a preferential unit cost from the preferred supplier.
- 7.1 There would be an annual purchase of around 500,000 litres of diesel saving an estimated £4,500 per annum (subject to varying fuel base rate). Exempt Appendix A outlines the pricing structure and cost per unit.

8 Legal Consequences

- 8.1 Part 4G of the Council's Constitution provides Contract Standing Orders.
- 8.3 The Council has used the CCS framework agreement which has given equal opportunity to suppliers on the framework via a reverse e – auction.

9 Risk Assessment

- 9.1 The base fuel price may fluctuate over the next 2 years which can be tracked which will affect the overall unit price per litre however the margins applied by the supplier and CCS are fixed

10 Other Considerations

- 10.1 This proposal does not impact on Crime & Disorder; Human Rights; Equality & Diversity and Sustainability matters.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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**Parkside, Chart Way, Horsham,
West Sussex RH12 1RL**

FORWARD PLAN

This notice sets out details of key decisions that the Cabinet or a Cabinet Member intend to make, and gives 28 days' notice of the decision under the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. The notice also includes details of other decisions the Council intends to make.

The reports and any background documents that have been used to inform the decisions will be available on the Council's website (www.horsham.gov.uk) or by contacting Committee Services at the Council Offices.

Whilst the majority of the Council's business will be open to the public, there will be occasions when the business to be considered contains confidential, commercially sensitive or personal information. This is formal notice under the 2012 Regulations that part or all of the reports on the decisions referred to in the schedule may be private because they contain exempt information under Part 1 of Schedule 12A to the Local Government Act 1972 (as amended) and the public interest in withholding the information outweighs the public interest in disclosing it.

If you wish to make representations about why part or all of the papers should be open to the public, please contact Committee Services at least 10 working days before the date on which the decision is to be taken.

If you wish to make representations to the Cabinet or Cabinet Member about the proposed decisions, please contact Committee Services to make your request.

Please note that the decision date given in this notice may be subject to change.

To contact Committee Services:

E-mail: : committeeservices@horsham.gov.uk

Tel: 01403 215123

Published on 01 November 2017 (updated 06 November 2017)

Page 442 **What is a Key Decision?**

A key decision is an executive decision which, is likely –

(i) to involve expenditure or savings of £250,000 or more as well as otherwise being significant having regard to the Council's budget for the service or function to which the decision relates; or

(ii) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the District.

	Subject/Decision	Decision Taker	Date(s) of decision	Is all or part of this item likely to be dealt with in private	Contact Officer Cabinet Member (NB include name, title and email address)
1	Car Parking Strategy and rural car park review Policy Development Advisory Group 10 January 2018	Cabinet	25 Jan 2018	Open	Chris Lyons, Director of Planning, Economic Development and Property chris.lyons@horsham.gov.uk Cabinet Member for Local Economy (Councillor Gordon Lindsay)
2	Consideration of business case for shared building control service with Crawley and Arun councils Policy Development Advisory Group 4 January 2018	Cabinet	25 Jan 2018	Open	Steve Shorrocks, Head of Building Control stephen.shorrocks@horsham.gov.uk Cabinet Member for Planning and Development (Councillor Claire Vickers)
3	Budget 2018/19 Policy Development Advisory Group 8 January 2018	Cabinet Council	25 Jan 2018 21 Feb 2018	Open	Jane Eaton, Director of Corporate Resources jane.eaton@horsham.gov.uk Cabinet Member for Finance and Assets (Councillor Brian Donnelly)

	Subject/Decision	Decision Taker	Date(s) of decision	Is all or part of this item likely to be dealt with in private	Contact Officer Cabinet Member (NB include name, title and email address)
4	Visitor Economy Partnership/Strategy Policy Development Advisory Group 1 November 2017	Cabinet	25 Jan 2018	Open	Clare Mangan, Head of Economic Development clare.mangan@horsham.gov.uk Cabinet Member for Local Economy (Councillor Gordon Lindsay)
5 Page 444	Local Plan Review - Issues and Options Policy Development Advisory Group 6 June and 7 September 2017	Cabinet	25 Jan 2018	Open	Barbara Childs, Head of Strategic Planning and Sustainability barbara.childs@horsham.gov.uk Cabinet Member for Planning and Development (Councillor Claire Vickers)
6	Approval of Conservation Area Appraisals & Management Plans following consultation Policy Development Advisory Group 4 January 2018	Cabinet	25 Jan 2018	Open	Barbara Childs, Head of Strategic Planning and Sustainability barbara.childs@horsham.gov.uk Cabinet Member for Planning and Development (Councillor Claire Vickers)

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