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# Cabinet

**Thursday, 20th September, 2018 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
	Claire Vickers	Planning and Development
	Tricia Youtan	Community and Wellbeing

You are summoned to the meeting to transact the following business

Glen Chipp  
Chief Executive

## Agenda

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	<b>Page No.</b>
1. <b>Apologies for absence</b>	
2. <b>Minutes</b>	3 - 8
<p>To approve as correct the minutes of the meeting held on 19<sup>th</sup> July 2018 <i>(Note: If any Member wishes to propose an amendment to the minutes they should submit this in writing to <a href="mailto:committeeservices@horsham.gov.uk">committeeservices@horsham.gov.uk</a> 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. <b>Declarations of Members' Interests</b>	
<p>To receive any declarations of interest from Members of the Cabinet</p>	
4. <b>Announcements</b>	
<p>To receive any announcements from the Leader, Cabinet Members or the Chief Executive</p>	
5. <b>Public Questions</b>	
<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. <b>Local Plan Review Issues and Options Consultation Draft - Employment, Tourism and Sustainable Rural Development - Feedback on comments</b>	9 - 184
<p>To receive the report of the Cabinet Member for Planning and Development</p>	

7.	<b>To agree the Horsham District Deal</b> To receive the report of the Leader	185 - 202
8.	<b>Rowan Drive, Billingshurst - Approval of a supplementary budget</b> To receive the report of the Cabinet Member for Community and Wellbeing	203 - 210
9.	<b>Car parking charges - Dukes Square</b> To receive the report of the Cabinet Member for Local Economy	211 - 216
10.	<b>75% Localisation of Business Rates 2019-20 Pilot Scheme</b> To receive the report of the Cabinet Member for Finance and Assets	217 - 222
11.	<b>Overview &amp; Scrutiny Committee</b> To consider any matters referred to Cabinet by the Overview & Scrutiny Committee – there are no matters outstanding	
12.	<b>Forward Plan</b> To note the Forward Plan	223 - 228
13.	<b>To consider matters of special urgency</b>	

**Cabinet**  
**19 JULY 2018**

Present: Councillors: Jonathan Chowen (Deputy Leader and Leisure and Culture) (Deputy Leader), Philip Circus (Waste, Recycling and Cleansing), Brian Donnelly (Finance and Assets), Claire Vickers (Planning and Development) and Tricia Youtan (Community and Wellbeing)

Apologies: Councillors: Ray Dawe (Leader) and Gordon Lindsay (Local Economy)

Also Present: Councillors: Paul Clarke, Jim Sanson and David Skipp

EX/9 **MINUTES**

The minutes of the meeting of the Cabinet held on 24<sup>th</sup> May 2018 were approved as a correct record and signed by the Leader.

EX/10 **DECLARATIONS OF MEMBERS' INTERESTS**

There were no declarations of interest.

EX/11 **ANNOUNCEMENTS**

The Cabinet Member for Waste, Recycling and Cleansing advised Cabinet of a letter he had received from a member of the public complimenting the Council on the new bin collection service, with particular reference to bins only needing to be put out on one day a week.

EX/12 **PUBLIC QUESTIONS**

No questions had been received.

EX/13 **HEATH COMMON VILLAGE DESIGN STATEMENT SUPPLEMENTARY PLANNING DOCUMENT - AGREEMENT TO ADOPT**

The Cabinet Member for Planning and Development reported that the existing Heath Common Village Design Statement, which had been adopted as Supplementary Planning Guidance by the Council in 1999, had limited planning weight as it referred to out of date planning documents and pre-dated the National Planning Policy Framework. Residents of Heath Common had therefore updated the Design Statement, in consultation with the Council, with a view to its adoption as a Supplementary Planning Document (SPD).

The draft Heath Common Design Statement SPD was then published for a four week consultation in accordance with the Town and Country Planning (Local

Planning) (England) Regulations 2012. The document was subsequently amended taking into account the representations submitted.

The Design Statement would provide officers and stakeholders with further information and guidance in relation to policies in the Horsham District Planning Framework and the emerging Storrington, Sullington & Washington Neighbourhood Plan.

The Cabinet Member therefore proposed that the updated Design Statement be adopted as a Supplementary Planning Document. If adopted, the document would be used by the Council to aid the determination of planning applications.

The Planning and Development Policy Development Advisory Group supported the proposal and had suggested the inclusion of text in the design statement to address its planning status, which had now been added.

Members discussed the process and value of 'local listing' for properties of special architectural interest or character which did not meet the criteria for listing by English Heritage. It was suggested that some expansion of local listing might be an appropriate project for the Year of Culture and the Cabinet Member agreed to investigate the potential for this.

#### RESOLVED

- (i) That the content of the consultation responses submitted to the Council be noted.
- (ii) That the comments of the Policy Development Advisory Group and consequent amendment of the Design Statement be noted.
- (iii) That the Heath Common Design Statement be approved and adopted, as submitted, as a Supplementary Planning Document (SPD) to supplement the Development Plan and to replace the Heath Common Village Design Statement SPG 1999.
- (iv) That the Cabinet Member for Planning and Development be authorised to agree minor editorial changes to the SPD.

#### REASONS

- (i) To take account of all consultation responses made in relation to the draft Heath Common Design Statement SPD.
- (ii) To enable the amended Heath Common Design Statement SPD, which takes into account the representations submitted, to be adopted as planning guidance to be used as a material consideration in the determination of relevant planning applications.

EX/14 **TRANSFORMATION FUND - TOP UP FROM THE 2017/18 BUDGET SURPLUS**

The Cabinet Member for Finance and Assets reported that the Council had delivered a £621,000 revenue surplus in 2017/18 after allowing for budgets that would be carried over to 2018/19 to cover essential expenditure which had been unavoidably delayed.

The Council was currently forecasting small surplus budgets in 2018/19 and 2019/20. This relied on the implementation of a range of actions to help deliver further income generation and efficiency measures, which required further investment in transformational projects. Budget deficits were forecast in the 2020s.

It was therefore proposed that £500,000 should be transferred from the General Fund reserve to the earmarked transformation reserve to help with transformation projects in the future. Effectively, this would be funded from the 2017/18 budget surplus.

The Finance and Assets Policy Development Advisory Group had been consulted and supported the proposal.

RESOLVED

- (i) That the transfer of £500,000 from the General Fund reserve to an earmarked transformation reserve be approved.
- (ii) That the Chief Executive, in consultation with the Leader, be authorised to use the transformation fund as appropriate.

REASON

To top up the earmarked transformation reserve for projects that will help transform the Council in the future.

EX/15 **OVERVIEW & SCRUTINY COMMITTEE**

There were no matters currently outstanding for consideration.

EX/16 **FORWARD PLAN**

The Forward Plan was noted.

EX/17 **TO CONSIDER MATTERS OF SPECIAL URGENCY**

There were no matters of special urgency to be considered.

EX/18 **TO CONSIDER THE FOLLOWING EXEMPT OR CONFIDENTIAL INFORMATION:**

RESOLVED

That, under Regulation 21(1)(b) of the Local Authorities (Executive Arrangements)(Access to Information) (England) Regulations 2000, the press and public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Part I of Schedule 12A to the Local Government Act 1972 by virtue of paragraph 3 and, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

EX/19 **FUNDING STRATEGY FOR THE FORUM MAINTENANCE**

The Cabinet Member for Finance and Assets submitted a report seeking approval for advance funding of The Forum residential service charge account in order that repair works to the exterior of the premises could be progressed in Spring 2019. Details of the split of the cost of the works between retail, residential and the car park were submitted together with information on how the expenditure would be recovered/ funded.

The Finance and Assets Policy Development Advisory Group had been consulted and supported the proposal.

RESOLVED

- (i) That the whole project for exterior maintenance works at The Forum be approved in the sum of £543,000.
- (ii) That the sum of £160,000 of advance funding to the residential service charge reserve fund for The Forum be included in the 2019/20 budget to enable the works to be carried out in the Spring of 2019, to be recovered/funded as reported.
- (iii) That the Chief Executive be authorised to accept the tender and enter into a contract for the works, subject to the whole project expenditure being no more than £543,000.

REASONS

- (i) To enable essential maintenance works to the Forum to be undertaken.
- (ii) To avoid delaying the works and to meet the Council's lease obligations.

- (iii) To allow residents to spread the burden of the cost of the works over three financial years.

*The meeting closed at 6.00 pm having commenced at 5.30 pm*

CHAIRMAN

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## Report to Cabinet

20 September 2018

By the Cabinet Member for Planning and Development

**DECISION REQUIRED**



**Horsham  
District  
Council**

Not Exempt

### **Local Plan Review Issues and Options – Employment, Tourism and Sustainable Rural Development: Representations**

#### **Executive Summary**

In March 2018 the first stage of the Local Plan Review (Issues and Options - Employment, Tourism and Sustainable Rural Development) was published for a seven week period of public consultation. This report sets out a summary of the responses that were received together with an outline of the proposed next steps. This report seeks approval for the publication of the summary of the representations and Horsham District Council's response as set out in Appendix 1.

#### **Recommendations**

That Cabinet is recommended:

- i) to note the summary of representations that were submitted in response to the Council's consultation on the Local Plan Review Issues and Options – Employment, Tourism and Sustainable Rural Development as set out in Appendix 1.
- ii) to approve the publication of the summary of the representations and Horsham District Council's response as set out in Appendix 1
- iii) to agree to progress the proposed next steps to the representations submitted as set out in Appendix 1.

#### **Reasons for Recommendations**

- i) In order to maintain and provide stakeholders with up-to-date information on the Local Plan Review following the processing and analysis of representations and to provide an initial response to the representations.
- ii) To enable the continued progression of the local plan review in accordance with the Council's published Local Development Scheme (LDS)
- iii) The preparation of the LDS is a statutory requirement of the Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008, Localism Act 2011, Housing and Planning Act 2016 and the Neighbourhood Planning Act 2017.

## **Background Papers**

Local Plan Review Issues and Options – Employment, Tourism and Sustainable Rural Development, April 2018

**Wards affected:** All.

### **Contact:**

Barbara Childs, Director of Place ext 5401

Catherine Howe, Principal Planning Officer – Strategic Planning ext 5505

## **Background Information**

### **1 Introduction and Background**

- 1.1 The Horsham District Planning Framework (HDPF) sets out the Council's planning strategy to 2031 to deliver sustainable development, balancing the social, economic and environmental needs of the district (outside the South Downs National Park). It is however necessary to review the HDPF because it is a requirement that Local Plans are monitored and are reviewed regularly to ensure that they are kept up-to-date. Furthermore, the Inspector who undertook the independent examination of the HDPF concluded that more work would be needed by the Council in the short to medium term to ensure that sufficient land was made available to meet the needs of businesses and to support economic growth in the future. He also indicated that a review of the plan should commence within three years; by the end of 2018.
- 1.2 In March 2018 the Cabinet approved the publication of the Local Plan Review Issues and Options - Employment, Tourism and Sustainable Rural Development for a seven week period of public consultation. This took place between 6 April 2018 and 25 May 2018. The Issues and Options document forms the first part of the review of the Horsham District Planning Framework (HDPF), which was adopted by the Council in November 2015, and the preparation of the new Horsham District Local Plan, which will run from 2018 to 2036.
- 1.3 The Issues and Options document focussed on the strategy for economic development in the District; addressing both the locational strategy for economic growth and identifying land that may have the potential for allocation for employment use. The document also set out how the Council can achieve sustainable development in the more rural parts of the district including consideration of development that takes place outside existing defined built-up area boundaries. The document does not cover all Local Plan topic issues, such as the development strategy for housing or design matters as these will be considered at the next stage of plan preparation, which is programmed, for publication in the autumn of 2019.
- 1.4 The consultation on the Issues and Options document was undertaken in accordance with the Town And Country Planning (Local Planning) (England) Regulations 2012, and in particular Regulation 18. The representations submitted have now been processed and analysed. It is considered important to make available a summary of the comments that were made to the Council to help inform all stakeholders, which includes local residents. This next step was identified in the report to Cabinet on 22 March 2018, which approved the publication of the Issues and Options document for consultation.

### **2 Relevant Council policy**

- 2.1 The Local Plan Review Issues and Options – Employment, Tourism and Sustainable Rural Development document is the first stage in preparing a planning strategy to replace the current adopted Horsham District Planning Framework (November 2015).

### 3 Details

- 3.1 The consultation on the Local Plan Review Issues and Options – Employment, Tourism and Sustainable Rural Development gave rise to approximately 400 representations from 151 respondents. Respondents included local residents, statutory consultees (e.g. West Sussex County Council, Environment Agency), local interest groups and developers. Just under half the respondents expressed some form of support for the document, albeit with some further form of modification proposed in many instances. The remainder of the representations received made objections in some form. Overall, this is a significantly higher level of support than is commonly received on similar planning consultations that have been run by the Council in the past.
- 3.2 The full summary of the representations received together with the proposed next steps is set out in Appendix 1. In addition, the following paragraphs provide a brief summary of the issues that were raised during the consultation and the action proposed by the Council in light of the representations which were received.
- 3.3 **Built Up Area Boundary (BUAB):** A total of 90 representations were received on this issue. Most comments on the built-up area boundaries were specific remarks relating to a proposed change to a particular town or village boundary rather than the principle of providing a boundary or not. In general, supportive comments were received where the BUAB was proposed for extension around land that has now been developed since the last Local Plan Review.
- 3.4 Objections to BUAB amendments were more varied in nature. A number proposed additional land for inclusion within a particular BUAB. Other objections questioned whether a particular site met the criteria which the Council had used to determine whether land should be included in the built form of development or not. Particular concern was raised in relation to the inclusion of some land in Rudgwick (RW3). In light of these comments, together with any new evidence provided in the responses, it is proposed that the identified BUAB amendments are reviewed to ensure that each site meets the assessment criteria. It should however be noted that where large scale amendments were proposed to the Council for inclusion in an updated built-up area, these will be considered for their potential for allocation in the Local Plan and not as a change to the built-up area in the first instance. The initial assessment of this land will take place through the Council's Strategic Housing Land Availability Assessment (SHELAA).
- 3.5 **Economy / Employment Sites / Key Employment Areas:** A total of 130 representations were received in relation to this issue. 36 related to the wider economy, with a further 52 representations made on the sites put forward for consideration for commercial use, and a further 42 on the proposed Key Employment Areas (KEAs). The comments received on this section were quite wide ranging in nature but overall, there was broad support for economic growth in the district. A number of respondents (primarily developers) did however state that the Council would need to consider the level of economic growth in the light of additional housing requirements for the district. The need for joint working, and consideration of cross boundary impacts beyond Horsham District was also identified.

- 3.6 There was a mixture of support and objection to the growth of employment outside town centres along key roads outside of town centres. The need to ensure that a range of town centre uses including offices continues to be provided in accordance with national planning policy. The need to consider the cumulative impacts of any new development on the traffic network was also highlighted. Overall there was support for the continuation of key employment areas, and some support was recorded for a number of the sites where potential for employment growth had been identified. A number of additional employment sites were also proposed to the Council for consideration for employment use. These included some sites which were proposed for mixed use development.
- 3.7 In order to take account of the representations on the economy, a number of different actions are considered necessary. This will include further updates to the evidence base to provide an up-to-date assessment of the amount and type of employment land which is required. Continued joint working as part of the Duty to Co-operate will also take place with other district, borough and county councils within Sussex and Surrey. Further site assessment work will also continue on the sites contained within the document, as well as those submitted to the Council for consideration as part of the consultation process. This will include those sites which have been proposed for mixed use. This will include assessment as part of the SHELAA and other processes as may be appropriate, including the Sustainability Appraisal of the Local Plan.
- 3.5 **Secondary Settlements:** A total of 79 representations were received on this topic area. There was some general support for this proposed policy designation, and a few sought greater flexibility to enable development beyond settlement boundaries. Most comments received on this section were however specific comments made in relation to individual settlements rather than the principle of the proposed designation. Many of these queried whether a particular settlement did or did not meet the criteria used by the Council to determine which settlements were appropriate candidates for a secondary settlement designation. In light of these responses it is considered that the settlements should be reviewed against the criteria to take account of additional evidence submitted during the consultation.
- 3.6 **Tourism:** There was a more limited response to the section of the document concerning tourism with 21 representations received. Most comments on Tourism were site specific in nature, either suggesting further work that would need to be undertaken in relation to the Toat Café site identified in the document (e.g. ecological work), or proposed other potential sites for tourism activity. Some comments also sought the retention and promotion of existing places/assets. These comments and additional work will need to be considered as part of the next stages of the Local Plan Review.
- 3.7 **Rural Economic Development and Rural Workers accommodation** Again, there was a more limited response to this section of the document with a total of 24 representations received. In general there was support for the overall aims of the two policy areas, but most comments on this section were very specific in nature, suggesting detailed amendments to the wording of the different policies outlined in the consultation document. It will be necessary to consider these suggested amendments moving forward together with other changes to planning legislation including those relating to permitted development rights.

## **4 Next Steps**

- 4.1 As has been set out in the previous section a number of actions have been proposed in order to take into account the representations submitted in response to this consultation. In summary, this will include a further work on the evidence base, continued joint working with other local authorities, and a review of the proposal in light of new evidence submitted as part of the consultation. Sites that have been proposed to the Council for development will be considered initially through the SHELAA assessment which is ongoing. Detailed comments on built up area boundaries and secondary settlements will need to be considered and updates made to policies if appropriate.
- 4.2 In addition to continuing to progress the topics covered in this consultation document, a wide range of other matters will need to be considered in order to progress the Local Plan Review. This will need to consider the future development strategy for housing development, taking account of the implications arising from the recently updated National Planning Policy Framework (NPPF). It is therefore anticipated that the next stage in the Local Plan review will be published in Autumn 2019, which will be subject to further consultation. This documentation will be accompanied by updated evidence base documents including a sustainability appraisal and a habitats regulation assessment. The timetable and the future steps in the preparation of the Local Plan review is set out in the Local Development Statement, which is published on the Council's website.

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

- 5.1 Initial feedback on the response to the Issues and Options consultation was provided to the Planning and Development Policy Development Advisory Group (PDAG) in July 2018. An update providing more information on the responses received was discussed at the PDAG meeting on xx September 2018. At these meetings the advice provided to the Cabinet Member for Planning and Development was that it would be appropriate to publish a summary of the representations received and the proposed next steps.
- 5.2 The Monitoring Officer and the Head of Finance have also been consulted on this report and the report has been updated to take account of the comments received.

## **6 Other Courses of Action Considered but Rejected**

- 6.1 An alternative course of action would be to not publish the summary of representations and Horsham District Council's response. This has been rejected because it would fail to keep respondents to the consultation and other interested parties up to date with the preparation of the new Local Plan. This would not

constitute good practice, as consultation and public engagement forms a key part of the plan making process. Key to good consultation is keeping respondents informed and responding to their comments which in turn facilitates ongoing engagement.

- 6.2 Another course of action would be to publish the summary of representations and Horsham District Council's response at the next consultation stage in the Local Plan Review. This has been rejected because the next consultation stage is planned for Autumn 2019 and it is not considered good practice to unduly delay the provision of information on a consultation for approximately a year and a half after the date that consultation was held.

## **7 Resource Consequences**

- 7.1 There are no direct financial or staffing consequences arising from this report other than the normal staff costs associated with the publication of this summary of responses.

## **8 Legal Consequences**

- 8.1 The publication of the summary of representations and the Horsham District Council's response is not a statutory requirement but forms good practice during the process of plan preparation. The summary of consultation responses will in the longer term be to inform the statutory (consultation) statement that must be prepared to support the Proposed Submission Document when the new Local Plan reaches publication stage in accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statutory statement must set out who was invited to make representations under regulation 18, how they were invited to make representations, a summary of the main issues raised and how they have been addressed in the Development Plan Document (DPD) (Local Plan Review).
- 8.2 The Local Plan forms part of the Council's policy framework and must be prepared in accordance with statutory process.
- 8.3 This process would ensure the Council complies with its legal requirements to keep the local plan up to date (including compliance with the Inspector's requirement to commence the Local Plan review within three years from the adoption of the HDPF).

## **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. Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local planning authorities to take into account any representation made to them in response to the regulation 18 consultation. The publishing of the document provided in Appendix 1 will help demonstrate this requirement is being met and, whilst not specifically invited to do so, provides an informal opportunity for respondents to raise any issues with the processing and

analysis of their comments. By following the required legal processes as set out in the relevant legislation the risk of a successful challenge is considered to be minimised as far as possible.

## **10 Other Considerations**

- 10.1 There are no direct crime and disorder consequences arising from the content of this report. The preparation of a Local Plan Review and the involvement of the community at each stage, will potentially contribute to improving the quality of life in the district and will therefore have a positive impact on human rights.
- 10.2 Assessment of the equalities impacts of the emerging new and revised policies in the reviewed Local Plan will be undertaken on an ongoing basis as part of the statutory sustainability appraisal process.

## **APPENDICES TO REPORT**

**Appendix 1:** Local Plan Review Issues and Options – Employment, Tourism and Sustainable Rural Development April 2018: Representation Summaries and Horsham District Council’s Response.

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018  
Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
8	Woolley			BUAB – Ashington	Amend Ashington Built Up Area Boundary to include Church Farm House, Church Lane. The private drive from Church Lane to the property is already included. Site is adjacent to central areas of the village and therefore directly relates to the built form rather than the countryside.	Object	Comments noted and the following action will be undertaken: <b>Ashington Built Up Area Boundary will be reviewed</b>
97	Carey			BUAB - Ashington Ashington	Land immediately north of the village is characterised by low/medium density housing served by B2133. It has a strong physical connectivity with the existing settlement of Ashington. Consideration should be given to creating a more extensive review of the proposed Built Up Area Boundary taking into account the level of housing identified in the Housing Needs Assessment undertaken as part of the Ashington Neighbourhood Plan.	Observation	Comments noted and the following action will be undertaken: <b>Ashington Built Up Area Boundary will be reviewed</b>
143	Brook	Sussex Wildlife Trust		BUAB – BG1 BG1	Support proposed amendment to BG1. Requests clarifications as to whether a buffer for the ancient woodland is included in the area removed?	Support with Modifications	Support welcomed and comments noted. <b>The ancient woodland buffer will be considered and will be reviewed in respect of the Built Up Area Boundary BG1 proposal.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018  
Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
115	Perks	Billingshurst N'hood Plan Working Group		BUAB - Billingshurst	Built Up Area Boundary Review for Billingshurst - acknowledges already consented development. It is noted that Old Reservoir Farm is currently being considered by Horsham District Council. If consent is given, due to it being immediately adjacent to BL1 the site may be appropriate to include within Built Up Area Boundary.	Support	Comments noted and the following action will be undertaken: <b>Billingshurst Built Up Area Boundary will be reviewed to take account of any decision on the site as appropriate.</b>
Page 18	Verster	Integrated Planning and Development Consultancy	Abingworth Development	BUAB CF1	Support CF1 - site has a stronger relationship with the built form of Cowfold rather than countryside and it is previously developed land. However, request that proposed Built Up Area Boundary is amended to include the full site of The Vicarage and The Old Vicarage.	Support with modifications	Comments noted and the following action will be undertaken: <b>Cowfold Built Up Area Boundary will be reviewed</b>
	60	Hall	Nuthurst Parish Council	BUAB Chapter 4	First two sentences of para 4.8 are confusing. Amend to say that 'Built Up Area Boundaries are used to define areas that are clearly discrete settlements and are not countryside'. Support principle of infilling within Built Up Area Boundary provided that it does not include residential gardens, in accordance with National Planning Policy Framework paras 48 and 53, due to the urbanising effect and fundamental alteration of the character of the local environment in rural villages. Para 4.10 - amend the "Review Process" to include criterion - "Neighbourhood Plans - where land adjoining an existing Built Up Area Boundary is allocated for development in a Neighbourhood Plan and the allocation has been granted	Object	Comments noted. <b>The information provided in this response will be reviewed when regard is given to built up area boundaries and impacts on residential gardens.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
					permission, the Built Up Area Boundary should be amended to include such land." Para 4.10 d) Gardens - whilst this is supported the Parish Council is concerned that the section could imply development in residential gardens is acceptable, which it is not.		
95	Longhorn			BUAB Crabtree	Object to proposed 'Secondary Settlement' designation of Crabtree. Agree that Horsham District Council should seek to re-establish Built Up Area Boundaries around some settlements but Crabtree is an unsustainable location. Facilities are limited and a gastro pub is simply not a sufficient anchor. Questions what evidence exists to show how many residents work at South Lodge due to proximity. More sustainable approach would be to direct growth, however minimal, to either Cowfold and/or Lower Beeding.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Crabtree</b>
135	Evans	Gladman Developments		BUAB General	It should be acknowledged that the built up area boundaries will need to be reconsidered when the levels of housing need planned are fully known. It is inevitable that through increased development needs there will be a need for the Local Plan to review settlement/built up area boundaries in order to identify sites that can meet housing need. The built up area boundaries should be consequently altered to account for the additional sites required. The current process seems to be a largely superfluous consideration of tidying up of some of the boundaries. Nevertheless there are some issues for rationalising settlement boundaries that could have been picked up.	Object	Comments noted. <b>The further revision of any BUABs to take account of any land allocated for development will take place later on in the local plan review process.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
125	Bourke	Dowsett Mayhew	Peter Meakin	BUAB Henfield	Support proposed amendments to Henfield Built Up Area Boundary as it meets the assessment criteria. DC/13/0787 (160 dwellings) has now been permitted and development on this site has now commenced. The site now relates to the built form of Henfield rather than the surrounding countryside	Support	Support welcomed and noted. <b>No action required</b>
48	Martin			BUAB Henfield (Para 4.8-4.19)	Amend Henfield Built Up Area Boundary to include land south of Mill End (see map attached to representation). Land adjoins existing Built Up Area Boundary and can be brought forward for development rapidly. Site is currently vacant.	Object	Comments noted and the following action will be undertaken: <b>Henfield Built Up Area Boundary will be reviewed</b>
20	Grant	Henfield Parish Council		BUAB HF1 & HF2	Parish Council supports inclusion of HF1 and HF2 within proposed Built Up Area Boundary amendment.	Support	Support welcomed and noted. <b>No action required.</b>
102	Welchman	Armstrong Rigg Planning	Dunmoore	BUAB Hilland Farm	Extend the Built Up Area Boundary (BUAB) north of Billingshurst to include the group of buildings around Hilland Farm because this would provide a stronger more logical defensible BUAB and avoid a gap between the BUAB and the land to the north which should be allocated for employment (NB -map was submitted to provide clarity over the boundary sought).	Object	Comments noted and the following action will be undertaken: <b>Billingshurst Built Up Area Boundary will be reviewed</b>
145	Brigden	Crawley Borough Council		BUAB Ifield	Ifield should be designated as part of a Built Up Area Boundary (map provided) and not a Secondary Settlement. Crawley Borough Council previously reviewed in 2012 as part of its Local Plan, see page 15 of Crawley 2030:	Object	Comments noted. <b>Further review as to the potential for a BUAB rather than a secondary settlement in this area</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
Page 21					Local Plan. The assessment was carried out prior to permission of DC/14/2131 - due to suburban nature it should be included within proposed Built Up Area Boundary. Strongly request that ribbon development, currently included in proposed Secondary Settlement boundary, to west of Rusper Road is excluded. In addition, it is strongly requested that the open space provided as part of development proposals along western boundary of the site is excluded from Built Up Area Boundary as it is not encompassed by built form. The land within Crawley's boundary, immediately to the west of the site, also remains outside the Built Up Area Boundary as it forms designated Local Green Space (to which Green Belt policies apply).		<b>will be made and further discussion will be held with CBC in relation to this matter as the local plan review is progressed.</b>
	106	Gibbs	Savills	Crest Strategic Projects and Bellway Homes Limited	BUAB Land East of Billingshurst	Include Land East of Billingshurst within the built up area boundary (Officer note: see submitted figure 3.2 for a plan of the area)	Object

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
120	Onuh	Thakeham Homes Ltd	Thakeham Homes Ltd	BUAB Land to the west of Worthing Road, Horsham	Support HDC approach to identify secondary settlements and the inclusion of a policy within the Local Plan Review. However, urge the Council to review Horsham Town Built Up Area Boundary. Land West of Worthing Road (SA599). The area is unconstrained by national policy and considered to be a sustainable location, well related to existing built up area. Site is available, suitable, achievable and deliverable, as such the Built Up Area Boundary should be amended to include Land West of Worthing Road (see map attached to representation).	Observation	Comments noted and the following action will be undertaken: <b>sites of this size will be considered as a potential allocation for development as opposed to a review of current BUAB and this is programmed for later in the review of the Local Plan review.</b>
Page 22	Bamford	Lower Beeding Parish Neighbourhood Plan Working Party		BUAB LB1	Object to LB1 - Cedar Cottage and Gardeners Cottages have characteristics of ribbon development and would have an impact on settlement coalescence with Cisswood Hotel located to the west. Current Built Up Area Boundary is in a logical place designating the centre of the village from its rural outskirts.	Object	Comments noted and the following action will be undertaken: <b>Lower Beeding Built Up Area Boundary will be reviewed</b>
91	Lamb	D M H Stallard		BUAB LB1	Support LB1 - Cedar Cottage and Gardeners Cottage relate to the built up area of the village both visually and connectively rather than the countryside. However, request an amendment to proposed Built Up Area Boundary to include the paddock to the rear of Cedar Cottage and land to the rear of Timberlands on Leechpond Hill as it does not reflect the character of the countryside.	Support with modifications	Comments noted and the following action will be undertaken: <b>Lower Beeding Built Up Area Boundary will be reviewed</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
60	Hall	Nuthurst Parish Council		BUAB Mannings Heath	Mannings Heath Built Up Area Boundary - The Parish Council: <ul style="list-style-type: none"> <li>• Support the deletion of MH1 (Land at Church Road) as proposed by HDC because the area is not allocated in the made Neighbourhood Plan</li> <li>• Request a further amendment to the BUAB: Land, previously part of Little Homefield, should be excluded from BUAB. Assessment criteria indicate property curtilages should be followed. Historically curtilage of Little Homefield on A281 was included. Curtilage has been reduced due to sale of part of rear garden, since this land is no longer within the curtilage of Little Homefield it should now be excluded from Built Up Area Boundary. (Officer Note: a plan was submitted to provide clarity)</li> </ul>	Support with Modifications	Support welcomed and comments noted. <b>The information provided in this response will be reviewed as part of a further review of the BUAB.</b>
137	Fielding			BUAB and Identification of Sites Para 2.9 / HDPF Policy 4	Support the identification of sustainable sites being completed regardless of historic built up area boundaries (BUAB) for the following reasons: <ul style="list-style-type: none"> <li>• The NPPF does not recognise (BUAB)</li> <li>• Sufficient suitable land is required to meet the housing, economic and tourism needs of the district</li> <li>• Rural development is crucial to enable businesses to be viable, villages to thrive and the retention and enhancement of local services and amenities</li> <li>• Neighbourhood plans do not yet focus on economic growth/business resilience</li> </ul>	Object	Comments noted.

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
148	Fielding			BUAB and Identification of Sites Para 2.9 / HDPF Policy 4	Support the identification of sustainable sites being completed regardless of historic built up area boundaries (BUAB) for the following reasons: <ul style="list-style-type: none"> <li>• The NPPF does not recognise (BUAB)</li> <li>• Sufficient suitable land is required to meet the housing, economic and tourism needs of the district</li> <li>• Rural development is crucial to enable businesses to be viable, villages to thrive and the retention and enhancement of local services and amenities</li> <li>• Neighbourhood plans do not yet focus on economic growth/business resilience</li> </ul>	Object	Comments noted.
149	Greene	Surrey County Council		BUAB Para 4.11 / Highways	In relation to Highways, with reference to paragraph 4.11 under the title 'Review of built up area boundaries', we would question why this current regulation 18 stage is not the appropriate stage for considering where larger scale sites for development should be placed.	Observation	Comments noted. <b>The consideration of land for larger scale development has been programmed for the next stage of the Local Plan review to ensure that all issues (economy and well as housing) are given full consideration.</b>
50	Burroughs	Slinfold Parish Council		BUAB Park Street	Parish Council request that the Built Up Area Boundary of Park Street (A29 end of village) is reinstated to that of the 2004 Built Up Area Boundary.	Object	Comments noted and the following action will be undertaken: <b>Slinfold Built Up Area Boundary at Park Street will be reviewed.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
13	Underwood	Pulborough Parish Council		BUAB PL1 & PL2	Agree to all recommendations apart from Built Up Area Boundary amendment PL2, this area was in danger of flooding in the conservation area.	Object	Comments noted and the information provided in this response will be reviewed. <b>The risk of flooding and impact upon the built up area boundary PL2 proposal will be given further consideration.</b>
5	Hobbs	Batcheller Monkhouse	Landowner	BUAB Rudgwick	We propose a further revision to the Built Up Area Boundary of Rudgwick to ensure the criteria is consistently applied. In particular, the land and properties at the eastern end of Highcroft Drive should be included.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
25	Thompson	Fidelitas Property Consultants	Rowanhurst Properties Ltd	BUAB Rudgwick	Support inclusion of RW1. However, to promote sustainable, controlled growth of settlements Built Up Area Boundaries must be flexible rather than used as exclusion zones. Amend proposed Built Up Area Boundary of Rudgwick to include Woodfalls, as shown on attached map. None of the Local Plan Review 'exclusion' criteria apply to Woodfalls as it adjoins existing Built Up Area Boundary with continuous pattern of existing housing stretching 0.25miles east to the Fox Inn on A281. Any form of development of the site would have a clear relationship with the existing built form.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>

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Page 26	135	Evans	Gladman Developments	BUAB Rudgwick	Amendments RW1 and RW2 are proposed to extend the built up area boundary. Gladman believe there is inconsistency in the process, whilst we do not disagree with the extension of RW2 it seems to have been arbitrarily ended to attempt to conform to the assessment criteria on page 40 of the Local Plan Review. Similarly there are areas to the north of Rudgwick, opposite RW1, which are excluded, whilst RW1 is added. The same is true to the south of Rudgwick where areas on both sides of Guildford Road, both to the east and west of the junction with the B2128 are excluded. There seems to be a missing level of consistency within the assessment.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be further reviewed</b>
	35	Kornycky		BUAB RW1	Support RW1	Support	Support welcomed and noted. <b>No action required</b>
	36	Foote	Rudgwick Parish Council	BUAB RW1	Support RW1 - land as far as Jasmine House has an urban frontage and relationship with Rudgwick to the south.	Support	Support welcomed and comments noted. <b>No action required.</b>
	55	Graham		BUAB RW1 & RW2	Object to RW1 & RW2. Breach a number of assessment criteria defined in Section 4.10 of Local Plan Review. Proposed amendments are rural in nature, not suburban.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
	16	Kornycky		BUAB RW2	Object RW2. Does not meet set criteria of Local Plan Review and assessment description is incorrect. Proposed Built Up Area Boundary amendment would weaken Horsham District Council's case for the appeal on DC/17/2377	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>

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19	Buckley			BUAB RW2	Object to RW2. The proposal does not follow the assessment criteria in the Local Plan Review. Concerns over impact of appeal (DC/17/2377) located to rear of proposed.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
20	Nicholson			BUAB RW2	Object to RW2. The proposal does not follow the assessment criteria in section 4.10 of Local Plan Review. It is rural area not suburban.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
22	Bridges			BUAB RW2	Object to RW2. The proposal does not follow the assessment criteria in section 4.10 of Local Plan Review. It is rural area not suburban as it is located outside of the village centre. Concerns over specialist wildlife.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
27	Ward			BUAB RW2	Object to RW2. The proposal does not follow the assessment criteria in section 4.10 of Local Plan Review and it is not considered suburban. Concerns over impact of appeal on land to the rear.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
24	Saunders			BUAB RW2	Object to RW2. The proposal doesn't follow the assessment criteria in section 4.10 of Local Plan Review and it is on outskirts of village and adjacent to open countryside. Concerns over impact on appeal located on land to the rear.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
25	Vine			BUAB RW2	Object to RW2. Proposal does not meet criteria set out in section 4.10 of Local Plan Review as it is a rural area. Highway safety concerns due to blind bend on junction with B2128. Local infrastructure at capacity.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
26	Macleod			BUAB RW2	Object to RW2. The proposal doesn't follow the assessment criteria in section 4.10 of Local Plan Review as it is rural area not suburban.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
							<b>Built Up Area Boundary will be reviewed</b>
28	Gue			BUAB RW2	Object to RW2. The proposal doesn't follow the assessment criteria in section 4.10 of the Local Plan Review as it is rural in nature not suburban.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
29	Smith			BUAB RW2	Object to RW2. The proposal doesn't follow the assessment criteria in section 4.10 of Local Plan Review as it is countryside rather than suburban. Concerns over impact on appeal at land rear of Swallow Ridge. Highway safety concerns due to lack of footpath and dangerous junction with Church Street.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
33	Taylor			BUAB RW2	Object to RW2. The proposed amendment is rural in nature, not suburban and does not meet the criteria set out in Section 4.10 of Local Plan Review.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
36	Foote	Rudgwick Parish Council		BUAB RW2	Object to RW2. Properties north of Lynwick Street have suburban appearance and should be included in Built Up Area Boundary. Properties to the south are rural in appearance and less related to the built form of Rudgwick.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary RW2 proposal will be reviewed.</b>
37	Blizard			BUAB RW2	Object to RW2. The proposed amendment does not make any sense. The 10 houses included in RW2 are no more or less urban or suburban than the rest of the north side of Lynwick Street or the whole of the south side.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
					Concerns over implications on appeal located north of site.		
39	Hodson			BUAB RW2	Object to RW2. Proposal would lead to urban sprawl. Questions impact on appeal site located to the north.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
40	Hall			BUAB RW2	Object to RW2. Proposed amendment is rural in nature not suburban and it does not meet criteria set out in Section 4.10 of Local Plan Review. Concerns over highway safety due to lack of pavements and road is frequently used by horse riders.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
41	Allen			BUAB RW2	Object to RW2. Proposed amendment is rural in nature not suburban and it does not meet criteria set out in Section 4.10 of Local Plan Review. Concerns over highway safety due to lack of pavements.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
52	Lowndes			BUAB RW2	Object to RW2. Proposed amendment is rural in nature, not suburban and does not meet criteria is Section 4.10 of Local Plan Review. Highway safety concerns due to lack of pavement.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
53	Gorton			BUAB RW2	Object to RW2. Proposed amendment is rural in nature, not suburban and does not help to preserve the unique landscape character of Rudgwick.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
57	Ellis			BUAB RW2	Object to RW2. Current Built Up Area Boundary is well established and has been robustly upheld by Horsham District Council to amend it now would have damaging	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>

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					consequences. Concerns over impact on appeal site located to the north.		
63	Pinney			BUAB RW2	Object to RW2. Proposed amendment does not meet criteria set out in Section 4.10 of Local Plan Review. Highway safety concerns due to volume of lorries travelling back and forth to landfill and springs which come up to the surface through the road that as a result is in poor repair. Concerns over impact on appeal site located to the north.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
Page 30	Thomson			BUAB RW2	Object to RW2 - proposed amendment does not meet criteria set out in Section 4.10 of Local Plan Review. Concerns over impact on appeal site located to the north.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
69	Grundy			BUAB RW2	Object to RW2. Proposed amendment does not meet criteria set out in Section 4.10 of Local Plan Review, it is rural in nature backing onto fields/woodland/ancient trees not suburban.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
70	Sutton			BUAB RW2	Object to RW2. Proposed amendment is rural in nature surrounded by fields, not suburban. Highway safety concerns due to lack of streetlights and no pavements. No mains drainage south of the bridge.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
71	Barr			BUAB RW2	Object RW2. Proposed amendment is rural in nature, not suburban. Highway safety concerns over lack of footpaths and no streetlights.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
76	Borrett			BUAB RW2	Object to RW2 - Proposed amendment is rural in nature not suburban and it does not meet	Object	Comments noted and the following action will be undertaken: <b>Rudgwick</b>

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					criteria set out in Section 4.10 of Local Plan Review.		<b>Built Up Area Boundary will be reviewed</b>
80	Browning			BUAB RW2	RW2 should not be included in the Built Up Area Boundary as it is outside the scope of the 'Review process' described at paragraph 4.10 nor does it meet any of the assessment criteria detailed in Section 4.10 of the Local Plan Review. Lynwick Street is rural in character and amendment would result in backland development, which would significantly alter the existing single depth linear settlement form of the street.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
86	Johnston			BUAB RW2	Object to RW2 - Rural in character, not suburban and does not meet set criteria within Local Plan Review.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
16	Kornycky			BUAB RW3	Support RW3. However, SUDS/open space should not be included within the amended Built Up Area Boundary.	Support with Modifications	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
21	Nash	Rudgwick Preservation Society		BUAB RW3	Object RW3 - Summerfold is a low density green estate with considerable area of landscaped land around the perimeter. Request that the proposed Built Up Area Boundary be amended to exclude landscaped areas and that it is re-examined.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
36	Foote	Rudgwick Parish Council		BUAB RW3	Support RW3 - Permission for 36 dwellings (DC/09/1623) and development completed. Site now relates to built form of village rather than surrounding countryside.	Support	Support welcomed and comments noted. <b>No action required.</b>
67	Butcher			BUAB RW3	Object to the inclusion of RW3. Summerfold Built Up Area Boundary amendment should not include the non-built landscape areas.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
72	Walker			BUAB RW3	Object to RW3. Summerfold Built Up Area Boundary amendment should not include the non-built landscape areas.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
72	Ennis			BUAB RW3	Common land area within Summerfold should not be included within proposed Built Up Area Boundary amendment. The area provides communal green space for residents and forms a barrier between the original properties and the new development.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
73	Mason			BUAB RW3	Proposed Built Up Area Boundary amendment should not incorporate the non-built landscape areas of Summerfold. The recent development designated the landscape area as a general amenity for all residents. If included in Built Up Area Boundary amendment there is a risk that it will be developed.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
74	Ashfield			BUAB RW3	Object to RW3 - Summerfold development has already had a significant impact on road safety, noise and loss of amenity space. Local school and doctor's surgery is at capacity.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>

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75	Ford			BUAB RW3	Object to RW3 - Proposed Built Up Area Boundary amendment should not include the non-built landscape areas at Summerfold.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
83	Betts			BUAB RW3	Summerfold development is now complete. However, the landscaped/parkland areas of the development should not be included within the proposed Built Up Area Boundary amendment as it could be subject to future development.	Support with modifications	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
Page 33	Jones			BUAB RW3	Proposed Built Up Area Boundary amendment RW3 should not include the landscaped area which is managed as a wild flower meadow and regularly inspected habitat for Great Crested Newts.	Support with modifications	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
	93	Betts		BUAB RW3	Strongly oppose inclusion of landscaped area of Summerfold within proposed Built Up Area Boundary amendment RW3. It is a shared amenity space and should not be included for potential development.	Support with modifications	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
130	Walker			BUAB RW3	Object to RW3. Summerfold Built Up Area Boundary amendment should not include the non-built landscape areas.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>

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131	Cook			BUAB RW3	Object to RW3. Summerfold Built Up Area Boundary amendment should not include the non-built landscape areas.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
21	Nash	Rudgwick Preservation Society	Chairman	BUAB Section 4, 4.10 a-d, Table 6, RW1 & RW2	Exclude RW1 and RW2. RW1 - no obvious reason as to why this side of the road is proposed Built Up Area Boundary amendment whereas the west side does not. It has proximity to heritage assets such as Crouchers and Sailtops which is contrary to criteria 5b. RW2 - Amend site name, correct spelling is 'Roosters'. Proposed amendment does not meet criteria set out in Local Plan Review and concerns over impact of appeal on land adjacent.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>
30	Bartlett	Batcheller Monkhouse		BUAB Section 4, Appendix 2, Page 39, Para 4.10, West Chiltington	New development sites that have an extant planning consent should be provisionally included with the revised boundaries to avoid need for further short-term review. Criteria for the inclusion of land that has a relationship with existing urban area has not been consistently applied. Specifically, West Chiltington BUAB should be amended to include land to the east of Threals Lane (DC/15/0193) and should also be extended to include adjacent farm buildings at the southern end of Threals Lane. See map submitted with representation.	Object	Comments noted and the following actions will be undertaken: <b>a) West Chiltington Built Up Area Boundary will be reviewed b) Additional information provided in this response will be reviewed</b>
47	Allen			BUAB Section 4.12, Page 47, Ref RW2	Object to RW2. Proposed amendment is rural in nature, not suburban and does not meet criteria is Section 4.10 of Local Plan Review.	Object	Comments noted and the following action will be undertaken: <b>Rudgwick Built Up Area Boundary will be reviewed</b>

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21	Nash	Rudgwick Preservation Society	Chairman	BUAB Section4, 4.10 a-d, Table 6, RW3	Support RW3. It is a housing estate which meets criteria set out in Local Plan Review.	Support	Support welcomed and noted. <b>No action required</b>
50	Burroughs	Slinfold Parish Council		BUAB SL1 - SL5	Parish Council supports proposed amendments SL1 to SL5.	Support	Support welcomed and comments noted. <b>No action required.</b>
7 Page 35	Boyd			BUAB Slinfold	Amend Slinfold Built Up Area Boundary to include gardens that were extended in 2001 located on Tannery Close	Object	Comments noted and the following action will be undertaken: <b>Slinfold Built Up Area Boundary will be reviewed</b>
	Carnell	Strutt & Parker	Brackley Barn	BUAB Slinfold	Amend Slinfold Built Up Area Boundary to include all the residential curtilage at Brackley Burn as shown on attached plan. The detached dwelling, outbuildings and approximately 62% of the garden are already within the defined Built Up Area Boundary.	Support with modifications	Comments noted and the following action will be undertaken: <b>Slinfold Built Up Area Boundary will be reviewed</b>
147	Tobin	Southwater Parish Council		BUAB Southwater	Parish seeks clarity as to why Great Lime Kiln area of open space and the allotment land lying to north have been excluded from proposed Built Up Area Boundary amendment. Great Lime Kiln falls within the Country Park and therefore, if Country Park falls within the boundary then consideration should be addressed by the Council as to its policy. Allotment land should also be included, request clarity as to why it should not. (Officer notes: telephone clarification indicated Southwater	Object	Comments noted. <b>The information provided in this response will be reviewed when considering the Built Up Area Boundary of Southwater.</b>

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					Parish Council considered all land between Southwater and the A24 should be in the built up area boundary)		
Page 36	Read	Storrington & Sullington Parish Council		BUAB SR1	Object to SR1 as this would expose the whole of Fryern Park to future development.	Object	Comments noted and the following action will be undertaken: <b>Storrington Built Up Area Boundary SR1 proposal will be reviewed</b>
82	Roxby	Steyning Parish Council		BUAB ST1, ST2, ST3	Parish Council broadly supports proposed Built Up Area Boundary amendments ST1, ST2 & ST3. However, there is concern that in the case of ST3, that there should be planning constraints to preclude further development along Sopers Lane, or any further encroachment on adjacent South Downs National Park.	Support with modifications	Comments noted. <b>The information provided in this response will be taken into account when Steyning's Built Up Area Boundary is reviewed.</b>
4	Quinlan			BUAB Storrington	Amend Storrington Built Up Area Boundary to include land to the south of Sandgate Lane. Been seeking to change what is considered an incorrect boundary since 2013. The Built Up Area Boundary includes the curtilage of a number of dwellings along Sandgate Lane but	Object	Comments noted and the following action will be undertaken: <b>Storrington Built Up Area Boundary will be reviewed</b>

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					excludes land between Tiptoe and Tumbly Woodside.		
96	Aldridge	CPA Property	Dudman Chantry Quarry	BUAB Storrington	Amend proposed Built Up Area Boundary of Storrington to include Chantry Industrial Estate and the Quarry Site. The site is located on the edge of the defined built-up area boundary of Storrington. The general site topography (the proposed commercial development will be set in the quarry) and A283 provide an effective barrier between the site and the main residential area of the village. The topography and existing mature woodland and proposed landscape works would also provide an effective visual screen, particularly from the adjacent South Downs National Park.	Object	Comments noted and the following action will be undertaken: <b>Storrington Built Up Area Boundary will be reviewed</b>
147	Tobin	Southwater Parish Council		BUAB SW1 & SW2	Representation received in two parts; original letter followed by clarification email. The Parish Council has no objection in principle to SW1 and SW2 being included in the built up area boundary.	Support	Support welcomed and noted. <b>No action required.</b>
147	Tobin	Southwater Parish Council		BUAB SW4	Representation received in two parts; original letter followed by clarification email. Parish Council supportive of the inclusion of Southwater 4. This development is already being built. Note: this is in the Parish of Shipley	Support	Support welcomed and comments noted. <b>No action required.</b>

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34	Hill			BUAB WN1	Amend proposed Built Up Area Boundary WN1 to include Single Cross which lies adjacent to Apple Garth. In addition, the Warnham Neighbourhood Plan site allocation lies to west of Single Cross and once 'made' would mean that development would be located to the east and west of the property.	Object	Comments noted and the following action will be undertaken: <b>Warnham Built Up Area Boundary will be reviewed</b>
62	Shakespear	WYG	IJ Scripps Ltd	BUAB	Amend Billingshurst Built Up Area Boundary to include land to the south west of the A272/A29 roundabout in order to facilitate the development of a petrol filling station to meet the locally identified need.	Object	Comments noted and the following action will be undertaken: <b>Billingshurst Built Up Area Boundary will be reviewed</b>
88	Cutler	Bloombridge Development Partners	NW Horsham Estates Ltd	BUAB	With regards to Table 6 and the proposal to extend the built-up area boundary around North Horsham allocation (HS1, page 43), suggest that it would be worth reviewing an extended amendment to include the proposed North West Horsham employment site.	Object	Comments noted and the following action will be undertaken: <b>Horsham Built Up Area Boundary will be reviewed</b>
134	Swale	Dominic Lawson Bespoke Planning	Our Place	BUAB	Welcome this review to provide further development opportunities outside existing built up area boundaries. Agree with the BUAB assessment criteria but do not agree with all the exclusions identified in their application. It is not realistic to be able to manage the degree of development coming forward in Horsham without some impact on the countryside. The purpose of policy in this context is to protect the most important areas and to enable high quality developments in those areas that are best able to accommodate development. The BUAB review approach does not go far enough to meet the needs of the rural communities.	Object	Comments noted. <b>The information provided in this response will be reviewed.</b>

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139	Savill	Washington Parish Council		BUAB	Concerned that if exceptions are made to Built Up Area Boundaries as described in Section 4.10(d) that it will be difficult to resist garden infill in larger plots close to the boundary which are currently protected by Horsham District Planning Framework Policy 26.	Object	Comments noted. <b>The information provided in this response will be reviewed. It should however be noted that all local plan policies are considered when determining applications and factors such as design, scale and massing would be considered in cases such as these.</b>
138	Brook	Sussex Wildlife Trust		BUAB	Amendments to Built Up Area Boundaries are not presented with environmental information in either Table 6 or Appendix 2, therefore unable to review sites in detail as currently unclear if changes are adjacent to any designated sites or priority habitats	Observation	Comments noted. <b>No action required.</b>
96	Aldridge	CPA Property	Dudman Chantry Quarry	Commercial Land at Chantry Quarry	Propose that Chantry Sand Quarry should be allocated as a commercial development site. Redevelopment of the existing Chantry Industrial Estate is not viable economically or commercially. The new development would form a highly energy efficient, modern commercial development for B1/B2 and B8 employment use. Plan attached to representation illustrates basic layout and proposed new vehicular access to A283. A key outcome for establishing the new business park at the Quarry site would be to enable the relocation of businesses from Chantry	Object	Comments noted. The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan

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Page 40					<p>Industrial Estate. The buildings on this site are fundamentally, technically and functionally obsolete with many being more than 80 years old. These buildings do not meet the requirements of the 2018 Energy Act regarding thermal performance and are unlettable in their current state. The proposal would enable the continued trading and prosperity of these businesses and would also make accommodation available for new and growing businesses in the area. The Employment Growth Assessment stresses a lack of availability of suitable small-scale properties, it is intended that the new business park will be a high quality facility which will attract high end, high skill businesses the need for which is identified in the Employment Growth Assessment and emphasized in the Employment Workspace Review (2016). Both Chantry Industrial Estate and Chantry Sand Quarry were proposed for inclusion in the first Storrington &amp; Sullington and Washington Neighbourhood Plan, the sites have also been considered through the Strategic Housing &amp; Employment Land Availability Assessment Ref SA544.</p> <p>Dudman Chantry Industries Ltd propose to submit a planning application for this scheme in June/July 2018.</p>		
	137	Fielding			<p>Conversion of Existing Agricultural Buildings to Other Uses 4.23</p>	<p>Request that Local Plan Review sets out how one can prove that a building for rural purposes is no longer necessary. Agricultural buildings should be seen as brownfield sites when they are no longer required as long as they are in a sustainable location. Conversion alone may</p>	Observation

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					restrict a more environmentally appropriate design because many agricultural buildings are not built for energy efficiency or modern living.		
148	Fielding			Conversion of Existing Agricultural Buildings to Other Uses 4.23	Request that Local Plan Review sets out how one can prove that a building for rural purposes is no longer necessary. Agricultural buildings should be seen as brown field sites when they are no longer required as long as they are in a sustainable location. Conversion alone may restrict a more environmentally appropriate design because many agricultural buildings are not built for energy efficiency or modern living.	Observation	Comments noted. <b>The information provided in this response will be considered.</b>

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143	Brook	Sussex Wildlife Trust		Conversion of Existing Agricultural Buildings to Other Uses Conversion of Agricultural and Rural Buildings Policy	Given the rural isolated nature of potential developments it is essential that the ecological context of the site is considered prior to determination in line with Section 165 of National Planning Policy Framework. (2012) Therefore, suggest an additional bullet point to the proposed Rural Workers Accommodation policy: <i>c) up to date ecological surveys are submitted to demonstrate the ecological value of the site and surround areas.</i> It is recognised that review of Horsham District Planning Framework Policy 10 contains wording which refers to enhancing biodiversity. However, these policies may also benefit from including wording which stipulates the need for applications to be accompanied by up to date ecological surveys. If Horsham District Council consider these suggestions unsuitable, it is encouraged to consider the incorporation of wording regarding up to date ecological surveys into the current Horsham District Planning Framework Policy 31 when reviewed.	Object	Comments noted. The following action will be undertaken: <b>a) when reviewing the Conversion of Agricultural and Rural Buildings policy regard will be given to the potential for inclusion of a requirement for up to date ecological surveys. This will need to be balanced against the general presumption against repeating elements of other policies in a plan.</b>
137	Fielding			Conversion of Existing Agricultural Buildings to Other Uses / Rural Economic Development HDPF Policy 10	Horsham District Planning Framework Policy 10 is in general supported but needs to be expanded beyond conversion of existing rural buildings so that it covers fit for purpose, energy efficient, fully accessible, quality accommodation and facilities to enhance tourism. Conversions may not meet the need that new purpose built tourism facilities can be designed, styled and built to enhance pleasure of the tourist and the environment. The desire for increased revenue from tourism must be	Support with modifications	Support is welcomed and comments noted. The following actions will be undertaken: <b>a) further reference to new buildings sufficient for tourist purposes in Policy 10 will be considered b) the necessity for a record of rural business</b>

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Page 43					articulated and rural diversification supported enabling residents and visitors to enjoy and access the countryside including the High Weald AONB. Support the proposed pragmatic approach to rural economic development and the encouragement for rural businesses but request a record of rural business activity be collated and maintained to help ascertain needs vital for tourism for example. Further business and employment data is required and at parish level, including a register of local employment, for the following reasons: <ul style="list-style-type: none"> <li>• To scope future needs including home working and home-based businesses which are vital forms of employment.</li> <li>• To ensure Neighbourhood Development Plans identify, capture and meet future employment and business development needs.</li> </ul>		<b>activity and local business/employment data at the parish level will be considered.</b>
	148	Fielding		Conversion of Existing Agricultural Buildings to Other Uses / Rural Economic Development HDPF Policy 10	Horsham District Planning Framework Policy 10 is in general supported but needs to be expanded beyond conversion of existing rural buildings so that it covers fit for purpose, energy efficient, fully accessible, quality accommodation and facilities to enhance tourism. Conversions may not meet the need that new purpose built tourism facilities can via design and style to enhance pleasure of the tourist and the environment. The desire for increased revenue from tourism must be articulated and rural diversification supported enabling residents and visitors to enjoy and access the countryside including the High Weald AONB. Support the proposed pragmatic approach to rural economic development and the encouragement for rural businesses but	Support with modifications	Support is welcomed and comments noted. The following actions will be undertaken: <b>a) further reference to new buildings sufficient for tourist purposes in Policy 10 will be considered b) the necessity for a record of rural business activity and local business/ employment data at the parish level will be considered.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps	
Page 44					request a record of rural business activity be collated and maintained to help ascertain needs vital for tourism for example. Further business and employment data is required and at parish level, including a register of local employment, for the following reasons:• To scope future needs including home working and home-based businesses which are vital forms of employment.• To ensure Neighbourhood Development Plans identify, capture and meet future employment and business development needs.			
	88	Griffin	Rural Planning Group	Knepp Castle Estate	Conversion of Existing Agricultural Buildings to Other Uses Paragraph 4.23	Supports Conversion of Agricultural and Rural Buildings to Business, Commercial, Community or Residential Uses Policy particularly where PD rights would not adequately provide scope.	Support	Support welcomed and noted. <b>No action required.</b>
	104	James	ECE Planning	Plymouth Brethren	Conversion of Existing Agricultural Buildings to Other Uses Policy 10	In relation to the Horsham Local Plan Review Issues and Options – Employment, Tourism and Sustainable Rural Development Document (April 2018), the Plymouth Brethren community positively support the draft ‘Conversion of Agricultural and Rural Buildings to Business, Commercial, Community or Residential uses’ policy which is detailed on page 66. This draft policy will effectively allow for the re-use of agricultural and rural buildings by community groups.	Support	Support welcomed and comments noted. <b>No action required.</b>
30	Bartlett	Batcheller Monkhouse		Conversion of Existing Agricultural Buildings to Other Uses Section 4, Page 66, Para 4.23	Support the introduction of the “Conversion of Agricultural and Rural Buildings to Business, Commercial, Community or Residential uses” policy as a positive step to releasing redundant buildings across the region back into active use. The final paragraph of the policy should be deleted to reflect paragraph 55 of the National Planning Policy Framework (2012) which does	Support with Modifications	Support welcome and comments noted. The following action will be undertaken: <b>A review of the policy wording in light of these proposed modifications.</b>	

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					not state a preference for one use over another. The requirement for a suitable candidate building to be of 'existing architectural merit' should be deleted from criterion d).		
6	Jubert	British Horse Society		Conversion of Existing Agricultural Buildings to Other Uses	Page 66 Conversion of Agricultural and Rural buildings: The para 'Any proposal must demonstrate they will not adversely affect the character, appearance or visual amenities and the intrinsic character and beauty of the countryside of the wider area' - is insufficient in content. This para does not sufficiently address the effects of rural development or conversions on the USE of Public Rights of Way. This would be in terms of increased activity on sites adjacent to PRow (Public Rights of Way) or containing PRow, changes to surfaces of PRow when being used as access roads to developments, temporary closures while site work is carried out and increased vehicle movements on rural roads that serve the PRow network. All of these effect the use of the path whether on foot, cycle or on horse, and should be considered in addition to the visual context.	Object	Comments noted and the following action will be undertaken: The following action will be undertaken: <b>A review of the policy wording in light of these proposed modifications.</b>

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60	Hall	Nuthurst Parish Council		Conversion of Existing Agricultural Buildings to Other Uses	Parish Council suggests conversion of existing agricultural buildings to residential should only be supported where residence is necessary to support agriculture, business or community use and that the policy has a condition to that effect.	Object	Comments noted. The following action will be undertaken: <b>A review of the policy wording in light of these proposed modifications.</b>
137	Fielding			Countryside Protection HDPF Policy 26	Horsham District Planning Framework Policy 26 is contradictory and should be amended. The NPPF requires development to be sustainable regardless of its location. Sustainable development cannot be restricted to replacement dwellings, house extensions and rural worker homes. Reference should be given to self and custom build homes and the need to promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venue, cultural buildings, public houses and places of worship.	Object	Comments noted. The need to accommodate self build and custom build homes will form part of the next stage of the local plan review process.
148	Fielding			Countryside Protection HDPF Policy 26	Horsham District Planning Framework Policy 26 is contradictory and should be amended. The NPPF requires development to be sustainable regardless of its location. Sustainable development cannot be restricted to replacement dwellings, house extensions and rural worker homes. Reference should be given to self and custom build homes and the need to promote the retention and development of local services and community facilities in villages, such as local shops, meeting places,	Object	Comments noted and the following action will be undertaken: The need to accommodate self build and custom build homes will form part of the next stage of the local plan review process.

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					sports venue, cultural buildings, public houses and places of worship.		
82 Page 47	Roxby	Steyning Parish Council		Economy 2.32 and 3.7	The Council would like to see some measure of protection given for High Street retail outlets to be kept for employment and not converted into residential use as well as for tourist accommodation not to be returned to residential use	Object	Comments noted. <b>The information provided in this response will be considered at the next stage of the local plan review when the retail policies are reviewed.</b>
60	Hall	Nuthurst Parish Council		Economy Economic Development (Chapter 2 in Issues and Options 2018)	No comment in respect of Economic Development (Chapter 2 in Issues and Options 2018)	No comment	No comment noted. <b>No action required.</b>
50	Burroughs	Slinfold Parish Council		Economy Economic Development Strategy / Novartis	Paragraph 2.34: Why does the text box following this paragraph not include continued support for the provision of high-quality employment land on the Novartis site?	Object	Comments noted. <b>The text box is high level in nature with no site specific information. This follows later in the document.</b>

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134	Swale	Dominic Lawson Bespoke Planning	Our Place	Economy Employment Strategy	<p>Support :</p> <ul style="list-style-type: none"> <li>• the proposed changes to the Key Employment Areas to protect valuable employment land in existing settlements,</li> <li>• the potential for employment development on the Land at Brinsbury College, and</li> <li>• the general policy of identifying sites on the strategic road network that can provide additional employment space.</li> <li>• the promotion of higher speed broadband, mobile coverage and other technological enhancement.</li> <li>• the economic strategy presented in the Issues and Options document and the policy in general terms.</li> </ul> <p>However the latter should go further given the demand in the District. Request addition of reference to mixed use sites, including new settlements in sustainable locations, as part of the solution to meeting the District's development requirements (consistent with NPPF para 84).</p> <p>The Issues and Options document refers specifically to new strategic sites as being appropriate locations to attract new companies to improve inward investment. However, in addition to new strategic sites, smaller sites are also crucial to meeting the identified need for employment growth and inward investment, for example, Brinsbury College is suitable for commercial development.</p> <p>We do not support the proposed restriction that</p>	Support with Modifications	<p>Support welcomed and comments noted. The following actions will be taken; <b>The evidence base will continue to be reviewed and updated to ensure that the development needs for the future are met.</b></p> <p><b>It should however be noted that this consultation focussed solely on sites solely considered for economic / commercial use.</b></p>

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Page 49					<p>such sites should be provided within an existing defensible boundary. There are sites in Horsham that are not constrained by the National Park, Green Belt or AONB designations, which are outside existing settlement boundaries and where any harm to the character of the area would be overcome by the benefits of development. The Council should consider such sites during the next phase of the Local Plan review.</p> <p>We agree that the locational strategy for employment sites should be relaxed to support the allocation of employment sites where the landscape features can be maintained and enhanced, such as Land at Brinsbury College. The Council should update its evidence at the earliest opportunity to understand its development needs now and in the future, including how much more employment land is required and where it should be located.</p>		
	100	Da Silva	DMH Stallard LLP	Hopegar Properties Ltd	Economy Evidence Base	<p>The EGA will need to be updated as it is based on the amount of employment land which is thought necessary to support an additional 750 homes per year, as this was the level of growth proposed at the time, however, the level of homes required in the District was increased to 800 by the Inspector during the examination of the HDPF. Whilst we support the Council's approach to adopting a higher figure than set out in the 2015 EGA, and also support this figure being set as a minimum provision, it is not known how the Council came to this figure. Clarification is necessary as this figure forms</p>	Object

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Page 50					<p>the starting point for consultation on the overall provision of employment land within the Plan period. Issues and Options document sets out that the amount of employment land required is further reduced once land which is already allocated/has come forward is taken off the total. Once the sites are taken into account the Council suggests that at least 27.6 hectares of new employment land will be required, it is not clear from the document which sites have been taken into account in this figure. The Economic Strategy (2017 – 2027) states that the District’s economic performance has been poor, business rates have remained static for the last five years. Agree with the concern that without further employment growth that the District is at risk of becoming dormitory.</p>		

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106	Gibbs	Savills	Crest Strategic Projects and Bellway Homes Limited	Economy Evidence Base	The new evidence base documents are light given that many date back to HDPF preparation and examination. In particular the Employment Land Review Part 1 (September 2009) and Part 2 (October 2010) are relatively out of date and cannot carry any considerable weight. Nor has an updated Sustainability Appraisal been produced. The introduction of the Standard Methodology for calculating housing needs suggests a higher housing figure needs to be accounted for. It is clear that the District Council must ensure that suitable land comes forward as part of the Local Plan Review for both employment and housing development. The evidence base needs to be updated to reflect the employment needs linked to the increasing housing needs in order to determine how many of the identified sites should come forward. Given that 85 hectares are currently identified this should not cause delay in plan progression.	Object	This document formed an initial stage of the local plan review process and as set out in the document did not cover housing as at the time of publication the housing methodology had not been published. This work will take place in the next stages of the local plan review and will be accompanied by a sustainability appraisal which will further inform any selection of sites. <b>The evidence base will continue to be reviewed and updated to ensure that the development needs for the future are met.</b>
135	Evans	Gladman Developments		Economy Evidence Base	The evidence base document on employment land/need was completed in 2015. Given that any review of the Local Plan may be 2 years away from adoption the age of this piece of evidence could well be dated by this time and in need of refreshing, especially given the document needs to look at issues across not just Horsham but the wider functional economic market area. Whilst this phase of the Local Plan Review does not consider housing needs, the context of future housing needs should be considered given the revised NPPF, Standard Methodology, unaffordability of housing in the	Object	This document formed an initial stage of the local plan review process and as set out in the document did not cover housing as at the time of publication the housing methodology had not been published. This work will take place in the next stages of the local plan review and will be accompanied by a

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					District and unmet needs in areas surrounding the District. These issues potentially impact upon built up area boundaries and economic development needs and should be taken into account to ensure that economic development is not stifled by a suppressed housing requirement.		sustainability appraisal which will further inform any selection of sites. <b>The evidence base will continue to be reviewed and updated to ensure that the development needs for the future are met.</b>
137 Page 52	Fielding			Economy HDPF Policy 7	Horsham District Planning Framework Policy 7 is supported but must be strengthened because Neighbourhood Development Plans are not meeting the economic growth and tourism needs of villages and small parishes. A register of local employment would benefit preparation of Neighbourhood Development Plans and strategic forecasting.	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be considered.</b>
148	Fielding			Economy HDPF Policy 7	Horsham District Planning Framework Policy 7 is supported but must be strengthened because Neighbourhood Development Plans are not meeting the economic growth and tourism needs of villages and small parishes. A register of local employment would benefit preparation of Neighbourhood Development Plans and strategic forecasting.	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be considered.</b>
137	Fielding			Economy HDPF Policy 9	Horsham District Planning Framework Policy 9 requires modification to remove reference to Built Up Area Boundaries as these are not recognised in National Planning Policy Framework. Proposals should be judged on sustainability, the requirement to be within a Built Up Area Boundary will prevent many start	Object	Comments noted. BUABs are a policy tool which are commonly used in planning policy to ensure that development takes place in a sustainable manner.

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					up and rural businesses from getting off the ground.		
148	Fielding			Economy HDPF Policy 9	Horsham District Planning Framework Policy 9 requires modification to remove reference to Built Up Area Boundaries as these are not recognised in National Planning Policy Framework. Proposals should be judged on sustainability, the requirement to be within a Built Up Area Boundary will prevent many start up and rural businesses from getting off the ground.	Object	Comments noted. BUABs are a policy tool which are commonly used in planning policy to ensure that development takes place in a sustainable manner.
53	Hodson	DBA Estates	Wienerberger	Economy HDPF Policy7, Policy 9 & Policy 10	The current Horsham District Planning Framework Policies 7, 9 and 10 all need to be reviewed to ensure the most appropriate land is retained and provided for employment. The existing employment stock is old and low to moderate quality and does not appeal to companies looking for investment in the South East region. Land requirements would suggest a minimum of 47 hectares is not an unreasonable figure. It is 8.9 hectares higher than originally required making allocation of proposed site at Station Road, Warnham even more invaluable.	Object	Comments noted. <b>No specific action required.</b>

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99	Watson	Savills (UK) Limited	Christ's Hospital Foundation	Economy-Hop Oast	Submit site for consideration as being suitable for commercial use. It is a circular piece of grassland to the west of the A24 and the Hop Oast roundabout with perimeter screening. It is located outside of the defined Built Up Area Boundary but is not subject to any other specific designations. Due to being located adjacent to the A24 the site could provide a convenient location for a hotel and service station such as a drive-thru restaurant.	Observation	Comments noted. <b>The further information provided on this site will be considered as part of the ongoing Local Plan review process.</b>
Page 54	Aldridge	CPA property	Dudman Chantry Quarry	Economy Land at Chantry Quarry	Local Plan Review clearly details the future need for employment land within the District. The Employment Growth Assessment provides clear evidence of this need. However, it is likely that this document will need to be reviewed once the housing target for the district is recalculated following the publication of the new assessment methodology. South of the district, particularly around Storrington, is likely to exacerbate following the loss of approximately half of the Water Lane Trading Estate to housing following approval of DC/15/2788 and the allocation of Thakeham Tiles in the Thakeham Neighbourhood Plan. The Paula Rosa decision is of particular concern as the site is located within a defined Key Employment Area. The need for additional employment sites within the locality is particularly acute following these recent large scale housing sites. The only recent local employment land allocations have been at Water Lane but these were to meet the specific growth requirements of a single company	Object	<b>The evidence base will continue to be reviewed and updated to ensure that the development needs for the future are met.</b> The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.

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Page 55					<p>(Tesla) and are not available for general commercial use. Without allocation of employment sites there will be continued growth of workers commuting out of the area.</p> <p>Concerns regarding the suitability and sustainability of a number of the sites promoted for employment use within the Review. These are clearly remote from existing settlements, unlike Chantry Industrial Estate and Chantry Sand Quarry which are located adjoining the settlement area boundary of Storrington which is classified as 'Small Towns and Larger Villages' in the Horsham District Planning Framework settlement hierarchy. Chantry Industrial Estate provides employment to over 150 people in over 7,000m<sup>2</sup> sub-standard industrial premises. Clarification is required as to why total exclusion of this site, which is a Key Employment Site, from the Local Plan Review has occurred.</p>		
	128	Greene	Surrey County Council	Economy p.32 / Highways	In relation to Highways, in terms of the relaxation of the locational strategy for employment sites suggested on p.32, employment sites should not necessarily be dictated by the presence of Major Roads. If they are predominantly office uses, these could, and should be located in town centres with access to stations, other public transport opportunities and cycling infrastructure.	Object	Comments noted. <b>The information provided in this response will be reviewed.</b>

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108	Griffin	Rural Planning Group	Knepp Castle Estate	Economy para 2.3	The economic growth strategy should include key employment opportunity areas along the strategic road network outside of existing built up areas. The strengths of the District and the rural economy should be exploited and given much more weight and recognition in the District's future economic strategy.	Object	Comments noted. <b>The information provided in this response will be reviewed.</b>
137	Fielding			Economy Para 2.34 / Proposed Local Plan Strategy for Economic Development	Support the proposed Local Plan strategy for economic development with one exception - the District must step in to fill gaps to ensure all the economic and tourism needs are met including smaller scale employment growth which should be but are not captured or reported in Neighbourhood Development Plans (NDPs). Proposals containing home offices and sustainable employment negating a need to travel to work should be encouraged.	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be reviewed.</b>
148	Fielding			Economy Para 2.34 / Proposed Local Plan Strategy for Economic Development	Support the proposed Local Plan strategy for economic development with one exception - the District must step in to fill gaps to ensure all the economic and tourism needs are met including smaller scale employment growth which should be but are not captured or reported in Neighbourhood Development Plans (NDPs). Proposals containing home offices and sustainable employment negating a need to travel to work should be encouraged.	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be reviewed.</b>
118	Shakespear	WYG	Newbridge Farms	Economy Section 2	The Council's strategy for identifying new employment sites could be expanded to make clear that such sites should have 'easy access to the district's strategic road network and be able to provide for a range of unit sizes'.	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be reviewed.</b>

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145	Brigden	Crawley Borough Council		Economy Section 2, para 2.1-2.2	Crawley Borough Council welcomes the recognition in the Issues and Options document (April 2018) of the strategic economic context in which Horsham functions. Particularly in referencing the Gatwick Diamond and the relationship of out-commuting between Horsham and Crawley/Gatwick.	Support	Support welcomed and comments noted. <b>No action required.</b>
145 Page 57	Brigden	Crawley Borough Council		Economy Section 2, para 2.13 and 2.18	Crawley Borough Council supports the reference to the jointly-commissioned evidence document 'Northern West Sussex Economic Growth Assessment' which remains valid and forms a strong foundation on which to progress, as it highlights the interconnections and dependencies across the wider area. Recommend joint updates of the evidence base to explore strategic economic growth. It is important that Horsham's employment need figure takes account of unmet business land need arising from Crawley. The Crawley Borough Local Plan identifies an unmet need of approximately 35 hectares/142,343sqm of business land/floorspace (to 2030). It recommends a sequential test for identifying business-led growth and Horsham falls within the third category 'land near Crawley/Gatwick'. It is anticipated that much of the unmet need will be addressed in Horley (75%/106,757sqm floorspace) and the unmet needs may not translate into commensurate land requirements in adjoining authorities. CBC would welcome working closely with Horsham, as well as Mid	Support with Modifications	Comments noted. Horsham District Council welcomes working jointly with other authorities especially in the production of an appropriate and proportionate evidence base. <b>The information provided in this response will be reviewed as the economic evidence base is updated.</b>

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Page 58					Sussex and Reigate and Banstead, to progress this.		
	Brigden	Crawley Borough Council		Economy Section 2, para 2.18	It is not clear how the rolled forward employment minimum requirement 47ha land to 2036 is identified or which evidence base this comes from. Crawley Borough Council questions whether this evidence is set out in a more recent evidence base document?	Observation	Comments noted. <b>The information provided in this consultation document was a starting point based on the initial evidence base, but it is recognised that this needs to be reviewed in light of wider growth requirements including those which will be derived from the new housing methodology.</b>

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Page 59	1	French	Gatwick Diamond Initiative	Economy	<p>Page 8, Table 1: • Strengths – a bullet point could be added acknowledging the strong and growing digital technology and gaming sector/cluster in Horsham.</p> <ul style="list-style-type: none"> <li>• Weaknesses – a bullet point says, ‘High numbers of young adults who move away from the district to attend college and do not return’. It would be more accurate to say, ‘High numbers of young adults who move away from the district for further and higher education and do not return’.</li> <li>• Weaknesses – A bullet says ‘Poor broadband speeds’. Nowadays, this should be more specific. Broadband speeds below 24mgb are now considered unacceptable.</li> <li>• Threats - a bullet point could be added talking about the current and rapidly ageing population.</li> <li>• Threats - a bullet point could be added about the threat to the Retail High Street of an increasing commuter population which is spending its money where it works.</li> </ul>	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be reviewed and consideration given to the addition/clarification of bullet points.</b>
	3	Purdye	Gatwick Airport Ltd	Economy	<p>We would ask that a policy or a section be added to make potential developers and others aware at an early stage that any proposed developments must comply with aerodrome safeguarding requirements. Therefore we would ask that a policy or a section be added to the document along the lines of: ‘Applications for development within the identified aerodrome safeguarding zone must comply with aerodrome safeguarding requirements. These requirements cover a number of aspects for example:</p>	Object	Comments noted and the following action will be undertaken: <b>a) The requirement for a policy or section regarding aerodrome safeguarding requirements will be reviewed taking into account the need to avoid undue duplication of national policy.</b>

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Page 60					<ul style="list-style-type: none"> <li>• Ensuring that buildings and structures including cranes do not interfere with navigational aids and Instrument Flight Procedures utilised by the airport</li> <li>• Ensuring that buildings and structures including cranes do not infringe the protected Obstacle Limitation Surfaces (OLS) within the safeguarding zone</li> <li>• Ensuring that the birdstrike risk to the airport is not increased through the careful design of landscaping schemes, buildings and water bodies and implementation of bird hazard management plans where appropriate</li> <li>• Ensuring that any lighting is carefully designed so as not to cause glint or glare to pilots or ATC'</li> </ul>			
	12	Tucker	Southern Water		Economy	No comment to make at this stage.	Observation	Comments noted. <b>No action required.</b>
	14	Holmes	Horsham Society		Economy	Horsham Town, and District, is continuing to lose local employment. A much larger and faster response is required than envisaged in the consultation document. The objective should be phrased in terms of a specific reduction in the number of people travelling elsewhere to work. There should be one or two sites that are large so that the site can be spacious and attractive, attract a range of companies allowing some synergy between them. Where possible some sites should be close to Horsham Town Centre so that town	Object	Comments noted. <b>The information provided in this response will be considered. The SHELAA documentation will also be reviewed and sites which are considered to have some potential for development will be considered for</b>

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					centre vitality is increased. A key site is the currently undeveloped portion of the previous Novartis site. Why is it shown as excluded in the Strategic Housing Employment Land Availability Assessment, (Strategic Housing & Economic Land Availability Assessment), as expected to be used for housing? Why is there no consideration of Hurst Road, the Station and RSA car park, the Sainsbury site or Searle's site? These are all sites that may have the scope to offer employment.		<b>inclusion in the Local Plan.</b>
17	Hornung			Economy	The challenges of developing a dynamic local economy within Horsham District, are being well addressed.	Support	Support welcomed and comments noted. <b>No action required.</b>
18	Burroughs	Slinfold Parish Council		Economy	Paragraph 2.33: We would point out that the "increased size of delivery and haulage vehicles" is an important reason for careful thought to be given to the location of employment sites. While West Sussex County Council Highways appear to be sanguine about the amount of goods traffic on 'A' roads, the Council believes that Horsham District Council should be more discerning. Some of the 'A' roads in the District are simply not suitable for high volumes of goods traffic – such as the A281 from Horsham to Guildford, the A29 from Rowhook to Beare Green, and the A264 from Newbridge to Five Oaks.	Object	Comments noted. <b>The information provided in this response will be reviewed and regard given to the suitability of respective 'A' roads to accommodate high volumes of goods traffic.</b>

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61	Grant	Henfield Parish Council		Economy	The Parish Council supports the key aims of the Visitor Economy Strategy, in particular the aim of making events a focus for the whole district, which benefits small towns and villages like Henfield.	Support	Support welcomed and comments noted. <b>No action required.</b>
82	Roxby	Steyning Parish Council		Economy	As Steyning is one of Horsham District Council's valuable rural market towns, the Council would appreciate some thought to the development and future sustainability of our local businesses & economy.	Observation	Comments noted. <b>The information provided in this response will be reviewed and consideration given to the sustainability of Steyning's market town local businesses &amp; economy.</b>
62	Da Silva	DMH Stallard LLP	Sweeptech Environmental Services and Edburton Contractors Ltd	Economy	The Economic Growth Assessment (EGA) will need to be updated as it is based on the amount of employment land which is thought necessary to support an additional 750 homes per year. Whilst we support the Council's approach to adopting a higher figure than set out in the 2015 EGA, and also support this figure being set as a minimum provision, it is not known how the Council came to this figure. Clarification is necessary as this figure forms the starting point for consultation on the overall provision of employment land within the Plan period. Issues and Options document sets out that the amount of employment land required is further reduced once land which is already allocated/has come forward is taken off the total. Once the sites are taken into account the Council suggests that at least 27.6 hectares of new employment land will be required, it is not clear from the document which sites have been	Object	<b>The evidence base will continue to be reviewed and updated to ensure that the development needs for the future are met.</b> This updated assessment will be used to inform the level of employment allocations which will be required.

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Page 63					taken into account in this figure. The Economic Strategy (2017 – 2027) outlines the Council's priorities and acknowledges that there is a shortage of commercial space resulting in a loss of existing businesses and outdated employment accommodation. In addition the Employment Floorspace Review (2016) advised there is a limited supply of space in both the office and industrial/warehouse sector compared with past years. The Economic Strategy also states that the District's economic performance has been poor, business rates have remained static for the last five years. Agree with the concern that without further employment growth that the District is at risk of becoming dormitory. There is a danger that if this occurs it will have an impact on the ability to support the current offerings within the settlements of the District. Concerned that there is a need to ensure that employment needs are met throughout the District and not just the main town of Horsham.		
	105	Mellor	Barton Willmore	Gleeson Strategic Land and the Ivor Warren Trust	Economy	Recognise that economic growth across the District is being affected by a number of issues including limited forward supply of new employment uses. Support the Council's aspiration to deliver a minimum of 47 hectares but consider that further research is required to establish the exact shortfall to be met in the light of the continued lack of economic supply, the extended plan period and the subsequent increased housing requirement. Agree with the Council's proposed approach to relax the locational strategy for employment sites, with needs unlikely to be met on existing	Support with modifications

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Page 64					employment sites and/or within the existing urban area. The Council is required to ensure a suitable strategy for growth is delivered, allowing economic and housing development in sustainable locations where there is an identified need. Consider that the site at Lower Broadbridge Heath Farm, Broadbridge Heath will assist in delivering this suitable strategy for economic and housing development in sustainable locations. In general the Economic Land Report assesses 40 sites, of which 17 are 'not currently development'. Of the 23 remaining sites these have capacity to provide 82.9 hectares of employment land. Of these 23 'deliverable/developable' sites the Council has reviewed a further 15 identified in table 5 of the review. No explanation is provided as to why 8 'deliverable/developable' sites identified in the Employment Land Review have not been assessed in the consultation document.		
	109	Fox	Quod	Mayfield Market Towns Limited	Economy	This is the representation from Mayfield Market Towns and wishes to highlight that there are opportunities which are within their landownership and could come forward outside any wider mixed use scheme. It is noted that the draft documentation identifies that additional employment land will be a minimum of 47 ha - it is highlighted that this final figure will be dependent on the housing number and states that the current figure is based on 800 dpa. Mayfield Market Towns consider that this figure will be considerably higher than the figure identified and existing employment areas in rural areas should also be considered in terms of their potential for additional growth.	Observation

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115	Perks	Billingshurst Neighbourhood Plan Working Group		Economy	It is questioned whether the need for 38.1ha of new employment land across the district (2.17) is calculated appropriately. There is uncertainty as to whether the figure of 38.1ha is NET, or not, of recently consented development. A steady demand for business space of between 5/6,000 sq ft (465/558sq metres 0.465/0.557 hectares) (2.14) would possibly be more suitable for Billingshurst, assuming these appeal to small, start-up and move-on businesses. Parking for future employment sites must be 100% accommodated on those sites (p66). This must be complemented by providing good cycle ways and pedestrian access, which can benefit residents also.	Object	Further evidence base work is programmed to identify the level of employment space which will be required in Horsham District Council over the next plan period. This updated assessment will be used to inform the level of employment allocations which will be required.
	Gleeson	Mole Valley District Council		Economy	No comments to make at this stage on the locational strategy for economic growth or any specific sites set out in the consultation document as having the potential for allocation as employment sites.  We hope that HDC would consider cross-boundary impacts should any areas be considered for new development close to the border with Mole Valley. MVDC values joint co-operation between neighbouring boroughs and districts and looks forward to hearing from HDC with regards to future consultations, on which we may wish to comment.	Observation	Comments noted. Horsham District Council fully supports joint working and the exploration of cross-boundary implications. In respect of the Issues and Options document - <b>No action required.</b>

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132	Partridge	Mid Sussex District Council		Economy	<p>Mid Sussex District Council is shortly to review its economic evidence to take account of the increased housing provision within the District Plan as background to the Site Allocations DPD in a manner consistent with Horsham District Council's approach which is therefore supported. Pleased to see the economic evidence base produced via joint working, particularly the Economic Land Review (2009) and the more recent Economic Growth Assessment (2015), is being used as a starting point for the Issues and Options report as it is currently the most up-to-date evidence.</p> <p>At this stage it is likely that work on economic need can be done on an authority-by-authority basis based on individual housing provision, employment projections and employment land availability. However the Council welcomes discussions regarding further joint work in terms of economic need and also cross-boundary implications as employment land options (in both areas) are refined. For example, transport infrastructure, complementary employment use offer rather than conflicting, the cumulative impact in habitat regulations assessment terms, and to ensure the economic strategies are mutually complementary.</p>	Support	Support welcomed and comments noted. Horsham District Council fully supports and welcomes the offer of future joint work to include economic needs and the exploration of cross-boundary implications. In respect of the Issues and Options - <b>No action required.</b>

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101	Da Silva	DMH Stallard LLP	Sweeptech Environmental Services and Edburton Contractors Ltd	Employment- Employment Strategy	Overall support proposed strategy for economic development. However, consider that more emphasis is needed on the role that employment sites have within smaller settlements. The document states that 27.6 hectares of new employment land is required. The proposed Key Employment Areas provide 26.4 hectares, however, it should be noted that these are not providing new employment land. Potential employment sites provide approximately 22.7 hectares. It is not clear whether the proposed allocations would meet required need. There is a need for the Council to take a more flexible approach and allocate additional and new sites for employment use. The proposed Local Plan strategy of economic development is set out in bullet point format, the majority of which repeat objectives set out within Horsham District Planning Framework Policies 7 and 9. Concerned about the wording of 7th bullet point as it is considered that it is too broad. Suggest that bullet point is separated to ensure businesses which are located within smaller settlements/rural areas of District are supported and kept as a separate matter from tourism economy. Clarity is required to ensure that 2nd bullet point refers to all existing sites including those in rural areas/smaller settlements as it is important to ensure these sites are allowed more flexibility and expansion is supported. Consider that same protection/opportunities should exist for rural settlements as the sites within larger towns of Horsham. 8th bullet point recognises need to provide additional employment land, it	Support with modifications	Support welcomed and comments noted. The following actions will be undertaken: <b>Consideration will be given as to whether the highlighted bullet points require clarification as suggested.</b>

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Page 68					is considered that there is a need to allocate additional sites beyond that included in the review. In relation to final bullet point, it is considered that there is a need to ensure that sites which are identified in Neighbourhood Plans are also included as Key Employment Areas. Policies within the Horsham District Planning Framework recognise that District has diverse urban and rural economy, it is important to ensure sufficient supply/choice in employment floor space across both rural and urban areas. It is important that the Local Plan Review continues to recognise this.		
	Cutler	Bloombridge Development Partners	NW Horsham Estates Ltd	Employment	Request that the longer term aspiration of a parkway station east of Kingsfold be added to the Proposals Map as a policy objective. Cherwell Local Plan Review has taken this approach to assist with the attractiveness and sustainability of Begbrook Science Park	Other	Comments noted. The need for an additional station would need to be considered through the next stages of the local plan taking into account the overall quantum of new development which will be required.
100	Da Silva	DMH Stallard LLP	Hopegar Properties Ltd	Employment	Overall support proposed strategy for economic development. However, consider that more emphasis is needed on the role that employment sites have within smaller settlements. The document states that 27.6 hectares of new employment land is required. The proposed Key Employment Areas provide 26.4 hectares, however, it should be noted that these are not providing new employment land. Potential employment sites provide approximately 22.7 hectares. It is not clear whether the proposed allocations would meet required need. The proposed Local Plan	Support with Modifications	Support welcomed and comments noted. The following actions will be undertaken: Further evidence base work is programmed to identify the level of employment space which will be required in Horsham District Council over the next plan period. . <b>Consideration will be given the bullet points</b>

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Page 69					<p>strategy of economic development is set out in bullet point format, the majority of which repeat objectives set out within Horsham District Planning Framework Policies 7 and 9.</p> <p>Concerned about the wording of 7th bullet point as it is considered that it is too broad. Suggest that bullet point is separated to ensure businesses which are located within smaller settlements/rural areas of District are supported and kept as a separate matter from tourism economy. Clarity is required to ensure that 2nd bullet point refers to all existing sites including those in rural areas/smaller settlements as it is important to ensure these sites are allowed more flexibility and expansion is supported. Consider that same protection/opportunities should exist for rural settlements as the sites within larger towns of Horsham. Policies within the Horsham District Planning Framework recognise that District has diverse urban and rural economy, it is important to ensure sufficient supply/choice in employment floor space across both rural and urban areas. It is important that the Local Plan Review continues to recognise this.</p>		<b>through the local plan review process.</b>
	144	Giacomelli	Natural England	Employment & Tourism Billingshurst	<p>Natural England's comments relate in particular to potential employment or tourism sites in and around Billingshurst. Though other sites may need to be reviewed within the Habitats Regulations Assessment of the emerging Horsham Local Plan. In the light of the comments Natural England would welcome the opportunity to meet with Horsham District Council to discuss the implications for the Local Plan of these comments which relate to the</p>	Observation	<p>Comments noted.</p> <p><b>Horsham District Council would welcome discussions and input from Natural England particularly regarding the SACs and Habitats Regulations Assessment.</b></p>

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					Ebernoe Common SAC and The Mens SAC and the need to protect the bats that roost within and forage beyond the SACs.		
89	Aldridge	CPA Property	McVeigh Parker and Charles Wadey	Employment Sites Andrews Hill	Allocate Site at Andrews Hill as an allocated employment site or Key Employment Area.	Object	The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.
90	Perks	Billingshurst Neighbourhood Plan Working Group		Employment Sites Billingshurst	The three local sites put forward for consideration for commercial use - Land North of Hilland Farm, Land West of Hilland Roundabout, Rosier Commercial Centre (pp100-102) - are identified as having potential to establish new employment land of potentially 21.3ha. This is considerably higher than the existing area within the village - Huffwood & Eagle, Daux Road, and Gillmans provide employment space of 7.8 ha - and, being approximately 25% of the potential area identified within the draft document, is disproportionate when considered across the district. This size is significantly in excess of that required by the parish's residents during the period until 2031.	Object	As set out in para 2.38 of the consultation document the total amount of land that is available for development exceeds that which is required and further work on the implications of the proposed sites have yet to be fully established. This work will take place <b>as part of the Local Plan Review.</b>

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109	Fox	Quod	Mayfield Market Towns Limited	Employment Sites Blacklands Farm near Henfield	Blacklands Farm, Wheatsheaf Road, Henfield BN5 9AT: this site extends to approximately 23 hectares and is located close to the junction of Wheatsheaf Road (B2116) and Sake Ride Lane. The site is partly in use as a caravan park and holiday lodges together with some commercial uses. However, there is an opportunity to intensify the employment floorspace in this location and deliver other uses in this location.	Object (Omission)	This site will be added to the Strategic Housing & Economic Land Availability Assessment as a potential location for employment development.
113	Edwards			Employment Sites Brackensfield Farm	Allocate Brackensfield Farm (SA290) for economic/mixed use for the following reasons: - Adjacent to Nowhurst Business Park; - Frontage onto a strategic highway (A281); - total site area (circa 3.52ha) is available for development (0-5years)	Object (Omission)	The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.
27	Evans			Employment Sites Brackensfield Farm/Nowhurst Business Park	A reasonable assessment would suggest a strategy for the selection of commercial sites should be relaxed, especially in relation to locations on strategic highways. A linkage of the Brackensfield site to Nowhurst Business Park could increase employment use provision and also yield an economy of scale and functional efficiency. The Council may wish to consider the Brackensfield site, which is available, for development as employment land.	Support with modifications	Comments noted and the content of this response will be reviewed. The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for

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Page 72							inclusion in the Local Plan.
	West	West Sussex County Council		Employment Sites Broadlands Business Campus	The site is poor in terms of accessibility by sustainable modes of transport. If the site is to be allocated, specific measures must be included in the Local Plan Review to require the applicant to promote and implement measures to enhance access by non-motorised users.	Support with modifications	Comments noted. The following action will be undertaken: <b>when reviewing the Broadlands Business Campus proposal regard will be given to measures to promote and implement measures to enhance access by non-motorised users.</b>

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138	West	West Sussex County Council		Employment Sites Broomers Hill Lane	The site is on the edge of the built up area of Pulborough. The location would limit the potential for access by sustainable modes. Improvements should still be considered to enhance access by non-motorised users towards Pulborough and should be included in the Local Plan Review. It is recommended that vehicular access is by way of a new junction at the existing A29/Broomers Hill Lane due to visibility to the north being restricted.	Support with modifications	Comments noted. The following action will be undertaken: a) <b>when reviewing the Broomers Hill Lane proposal regard will be given to the comments on access and accessibility</b>
Page 73	Griffin	Rural Planning Group	Knepp Castle Estate	Employment Sites Buckbarn Crossroads	The Horsham District Employment Growth Assessment 2015 states that the Council should plan for a minimum of 49ha of commercial land to 2036. We would therefore suggest that the Local Plan should be considering all sites that have been put forward for future commercial use. Development of the Buckbarn sites and the potential use of adjacent land could help to improve the current access arrangement for the service station. The estate is currently investigating access options that would provide such a solution.	Support with modifications	Comments noted.

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138	West	West Sussex County Council		Employment Sites Buckbarn Crossroads	There is concern as to whether this site could be accessed safely for either vehicular traffic or by non-motorised users. Subject to the consent of the landowner, the southern parcel at least could be accessed by way of the existing services. Vehicular access into the northern parcel would be complicated due to the presence of the signalised junction into the services and the merge lane onto the northbound A24. The potential for any access would need to be considered in detail to ensure an allocation on either parcel was deliverable.	Object	Comments noted. The following action will be undertaken: <b>when reviewing the Buckbarn Crossroads proposal regard will be given to the comments on access and accessibility.</b>
	Verster	Integrated Planning and Development Consultancy	Abingworth Development	Employment Sites Cowfold Glebe (SHELAA 2016 site SA083)	Include Cowfold Glebe (Strategic Housing & Economic Land Availability Assessment 2016 site SA083) in employment land allocation.	Object (Omission)	The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.
98	Whitehead	North Horsham Parish Council		Employment Sites Crawley Road	There is a small pocket of land currently used for employment on Crawley Road that comprises of Millers scrapyards and Horsham Flooring. This could have continued use for employment and there is some opportunity for minor development. However, it is acknowledged that this land may not be available for some time.	Object (Omission)	Comments noted. <b>The information provided in this response will be reviewed and regard given to whether the land on Crawley Road should form an employment site.</b>

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1	French	Gatwick Diamond Initiative		Employment Sites Former Novartis Site	The Gatwick Diamond Initiative welcomes any increase in employment land. Former Novartis Site – agree with removing the designation for educational use, but feel the designation could be more specifically worded ' to provide a key employment site for technology, knowledge intensive and associated businesses' to make it clear that it will be a technology park and discourage warehousing and trading counters (Science Park would be too restrictive).	Support with modifications	Support welcomed and comments noted. The following action will be undertaken: <b>The specific designation of the Novartis site as a key employment site for technology, knowledge intensive and associated businesses will be reviewed.</b>
Page 75	Carr	West Sussex County Council		Employment Sites Former Novartis Site	West Sussex County Council requests that Horsham District Council considers the option of allocating the former Novartis site for a mixed commercial and residential regeneration scheme which should be encompassed into a site specific policy in the Emerging Local Plan Review. Horsham District Council should also update the Strategic Housing & Economic Land Availability Assessment for site SA390 to show land to the north of Parsonage Road as a separate parcel, given that this has now been fully built out. The land to the south, should be considered separately for mixed use commercial and residential development as set out above.	Support with modifications	Comments noted and the information provided in this response will be reviewed and the following actions will be undertaken: <b>a) the allocation of the former Novartis site will be reviewed b) SHELAA site SA390 will be reviewed taking into consideration the comments provided.</b>

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98	Whitehead	North Horsham Parish Council		Employment Sites Former Novartis Site	Former Novartis site, Wimblehurst Road. The Parish Council supports mixed use employment on this site, but not industrial processes. This site was originally going to be associated with the University of Sussex and with Collyers Sixth Form college nearby, ways to connect the site of the Art Deco building that will be used as a Science Park and the students seems apt. Could a footbridge be installed over the railway to give greater connectivity, not only to Collyers, but to Horsham Park and the town? By giving Collyers greater connectivity, education opportunities could be opened up for the future.	Support with Modifications	Comments noted. <b>The information provided in this response will be reviewed and consideration given to the suggestions proposed.</b>
96	West	West Sussex County Council		Employment Sites Graylands Estate	The site is poor in terms of accessibility by sustainable modes. If the site is to be allocated, specific measures must be included in the Local Plan Review to require the applicant to promote and implement measures to enhance access by non-motorised users to the proposed development.	Support with modifications	Comments noted. The following action will be undertaken: <b>when reviewing the Graylands Estate proposal regard will be given to the inclusion of measures to enhance access by non-motorised users</b>
134	Swale	Dominic Lawson Bespoke Planning	Our Place	Employment Sites Land at Brinsbury College	Support the allocation of Land at Brinsbury College as a new site for commercial use. It is an appropriate and sustainable site for development for the following reasons: <ul style="list-style-type: none"> <li>• located on the strategic road network with regular bus service,</li> <li>• employment exists on the site</li> <li>• site is emerging as a focus for new employment use with permitted developments</li> </ul>	Support	Support welcomed and comments noted. <b>No action required.</b>

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Page 77					<p>close by, and</p> <ul style="list-style-type: none"> <li>• site has no physical constraints to hinder development as acknowledged in the Brinsbury Centre of Rural Excellence SPD (2009) para 1.11.</li> <li>• In accordance with the SPD it can provide business operations in collaboration with the College to maintain its viability for rural land-based education.</li> <li>• It can provide modern accommodation suited to the needs of a wide range of new businesses including small units for start-up companies and rural based employment opportunities well suited to the requirements of Brinsbury Students who seek to set up businesses.</li> <li>• The allocation of Adversane as a secondary settlement supports the provision of sustainable development in this location offering an important opportunity to create a new employment hub in the District, which is well connected to the strategic road and rail network and brings opportunities to invest in additional appropriate transport infrastructure.</li> <li>• Our Landscape Appraisal shows the site can accommodate further development without resulting in substantial effect on the landscape and visual receptors.</li> <li>• With appropriate investment in infrastructure, Land at Brinsbury College could become the focus for a more substantial development, including residential development</li> </ul>		

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138	West	West Sussex County Council		Employment Sites Land at Brinsbury College	Most of the proposed site allocation now either benefits from planning permissions that have either been implemented or that are permitted but as yet unimplemented. The highways and transport impacts have therefore been considered and appropriate schemes of mitigation approved. The poor accessibility of the site by non-motorised users has been a concern for West Sussex County Council, and ideally a sustainable access strategy would have been developed for the whole site rather than each application being considered on its respective merits. Notwithstanding this, the site allocation policy should include a requirement for the development proposals to work collaboratively with other existing nearby developments to introduce and promote measures to enhance the accessibility of the location by sustainable transport modes.	Support with modifications	Comments noted. The following action will be undertaken: <b>When reviewing the Land at Brinsbury Campus site, regard will be given to a for the development proposals to work collaboratively with other existing nearby developments to introduce and promote measures to enhance the accessibility of the location by sustainable transport modes.</b>
78	Cutler	Bloombridge Development Partners	NW Horsham Estates Ltd	Employment Sites Land at Langhurstwood Road (SHELAA site SA846)	Request the following changes are made to the draft plan prior to submission: 1) The proposed employment area at North West Horsham, Langhurstwood Road (Strategic Housing & Economic Land Availability Assessment site SA846) should be allocated as a Key Employment Area. 2) Agree with paragraph 2.37 of Local Plan Review that additional employment land is required and request that this proposal is considered and included in Appendix 1 3) Note that Local Plan Review includes more employment land than is required and see no reason for this to change as an oversupply ensures 'choice and flexibility'. Some of the larger range sites could be categorized as	Object (Omission)	Comments and suggestions noted. The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.

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Page 79					'safeguarded' (subject to proven or specified need) 4) Note that Table 5 of Local Plan Review states that the Broadlands Business campus is "well-appointed containing two very high quality 'prestige' office buildings" and goes on to proposed "small area of land east of the main access". The North West Horsham proposal would add to this providing 'choice and flexibility' in an approved 'tried and tested' location. The Graylands Estate is also located in the area and supported in Table 5, there are therefore strong grounds for an expanded high quality Key Employment Area. There is a strong case for North West Horsham as it has a 'critical mass' of employment assets and it is rare to find an opportunity to extend and existing, successful employment area without significant detriment. The area is an additional 15 hectares with further potential for a parkway station which is highly sustainable.		
	138	West	West Sussex County Council	Employment Sites Land at Maydwell	Access by sustainable modes is poor, although the presence of the Downs Link (a long distance off road cycle route) to the north could present a travel option for some. Suitable measures would be required as part of any allocation to require the introduction of suitable measures to enhance accessibility.	Support with modifications	Comments noted. The following action will be undertaken: <b>a) when reviewing the Land at Maydwell proposal regard will be given to the comments on access and accessibility</b>

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10	Pope	Boyer Planning	Taylor Wimpey	Employment Sites Land at Maydwell Avenue	<p>We support the Council's proposed allocation of the Land at Maydwell Avenue, Slinfold for employment development for the following reasons:</p> <ul style="list-style-type: none"> <li>• it will help to provide an appropriate level of employment for residents given the Slinfold Neighbourhood Plan includes housing allocations</li> <li>• the land benefits from excellent connections to the strategic network and lies within close proximity to sustainable settlements helping to unlock long-term growth in the settlements/Slinfold</li> <li>• the site meets the Council's objectives for allocating potential land for employment</li> </ul>	Support	Support noted. <b>No action required.</b>
10	James	ECE Planning	Arun Business Consortium	Employment Sites Land at Westons Farm	<p>Include 24ha of land at Westons Farm for employment floorspace (B1/B2/B8 Use Classes) in the form of an industrial and business park with a meeting hall for Plymouth Brethren Community (24ha arable land and 12ha water meadow). This could include ecological improvements over a further 12ha to the east of the site (water meadows and amenity landscaping which will be significantly enhanced and not subject to built development). Details of the site were previously submitted as part of the Council's Call for Sites (9th May 2018). The site has excellent access links to neighbouring villages and towns via nearby trunk roads (A24 and A264) including access to Gatwick airport which is located approximately 12.75km to the north-east of the site. Site would be contained within existing defensible boundary, with the existing landscaping features maintained and</p>	Object (Omission)	Comments noted. The suitability of this site will initially be considered through the Council's SHELA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.

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					enhanced, and we feel the locational strategy should be relaxed to support the allocation of sites for employment growth where they are adjacent to the key strategic road network. The allocation of new employment land at Westons Farm would make a valuable contribution to weaknesses identified on page 8 of the Local Plan Review; that "69% of commercial space was built before 1980" and there is a "lack of employment land".		
LP Page 81	Shaw	Shaw Design Services Ltd	Mr Shaun Francis (Landowner)	Employment Sites Land North of Broomers Hill (SHELAA site SA830)	Include Land North of Broomers Hill (Strategic Housing & Economic Land Availability Assessment site SA830) in employment land allocation. It has naturally defensible boundaries and in our opinion would not give rise to sporadic growth or ribbon development. This site would be self-contained however could arguably be perceived as a natural growth of the adjoining Broomers Hill Park industrial estate. The site benefits from an existing vehicle access leading directly from the existing public highway. This new allocation will significantly increase the total area of business land in the village to provide local jobs, which will help reduce the high levels of out-commuting.	Object (Omission)	Comments noted. The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.

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102	Welchman	Armstrong Rigg Planning	Dunmoore	Employment Sites Land North of Hillands Farm	<p>Allocate the 8.2ha grassland north of Hilland Farm as an employment site. There are a number of challenges facing the employment sector in Billingshurst which this site can help to address. It is larger and is better located, on the fringe of Billingshurst near strategic highway network, than Huffwood Trading Estate which should lose its KEA status. The constraints and concerns raised in respect of this site in the consultation document can be addressed or mitigated. It is considered to be one of the most sustainable locations in the District to accommodate further growth.</p> <p>The freeholder of the site specialises in commercial development and companies are interested in the site meaning the site is achievable and developable for economic development. The site is relatively free from constraints (technical supporting documents submitted with the representation: site plans, potential layout, landscape and visual appraisal, tree survey and constraints plan, ecological appraisal, archaeology and heritage assessment, flood risk and drainage assessment, and highway authority response). The site could deliver the following quality modern floorspace:</p> <ul style="list-style-type: none"> <li>• Employment – eg start up business/light industrial/offices</li> <li>• Commercial – eg hotel, petrol filling station with ancillary retail</li> </ul>	Support	Support noted. <b>No action required.</b>
54	Brindley	CMYK (Planning and Design) Ltd	Riverdale Development	Employment Sites Land North of Mercer Road, Horsham	Consider land north of Mercer Road, North Horsham as a potential employment site. The site lies close to the existing employment uses	Object (Omission)	The suitability of this site will initially be considered

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					and easily accessible with Mercer Road leading onto Langhurstwood Road which has direct access onto the A264. Warnham station is also within easy walking distance.		through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.
56 Page 83	Rodway	Rodway Planning	Tates of Sussex Ltd	Employment Sites Land Rear of Hilliers Garden Centre (SHELAA Ref SA570)	Supportive of an employment allocation at this site, but would also be supportive of a mixed-use or an entirely residential allocation in the emerging Local Plan, and confirm that any development would be deliverable within a short-term timeframe.	Support with Modifications	Comments noted. The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.
138	West	West Sussex County Council		Employment Sites Land South of Star Road	The site adjoins the existing industrial estate. Access into Partridge Green by non-motorised users is good and the site lies close to Downs Link, which provides an off-road cycle route that puts Henfield within reasonable cycle distance. In all other respects the location is poor in terms of access by sustainable modes. Although access to the site from the wider network would be via B roads, these would not be suited to any significant increase in HGV activity. Such matters would be considered as	Support	Comments noted. The following action will be undertaken: <b>a) when reviewing the Land South of Star Road proposal regard will be given to the comments on access and accessibility.</b>

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Page 84					part of any future planning application once the potential development mix were known.		
	Hodson	DBA Estates	Wienerberger	Employment Sites Land to the north of Station Road, Warnham	Allocate Land to the north of Station Road, Warnham (Strategic Housing & Economic Land Availability Assessment site SA842) for employment use. Site put forward is circa 8 hectares with access from Station Road. Land could accommodate up to 5.5 hectares of employment land delivery up to 22,000sqm of B1 use floorspace. An indicative masterplan is included in Appendix 2 of representation. The site lies in a well-connected area and is adjacent to current employment land. The proposed development at Station Road will help meet the undersupply of employment land in a sustainable location in line with NPPF requirements. Development of the site would also help avoid the district becoming 'dormitory'.	Object (Omission)	Comments noted. The Local Plan Review will help to inform the deliverability/developability of sites in subsequent housing and economic land availability assessments (SHELAAs) which are undertaken annually.
118	Shakespear	WYG	Newbridge Farms	Employment Sites Land West of Hilland Roundabout	Support allocation of Land West of Hilland Roundabout (SA668) as economic Land.	Support with Modifications	Support noted. <b>No action required.</b>
147	Tobin	Southwater Parish Council		Employment Sites	Representation received in two parts; original letter followed by clarification email. The	Support	Support <b>No action required.</b>

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				Land West of Hop Oast	Parish Council also has no objection in principle to the site to the north of the Shell Garage on the A24		
138	West	West Sussex County Council		Employment Sites Land West of Petrol Station, Hop Oast	Ideally access would be taken via the various uses to the immediate east of the site and then through the traffic signals on the B2237. Alternatively a left in, left arrangement may be possible onto the A24 southbound. Spacing to the existing petrol station access and to the Hop Oast Roundabout will be a key consideration; the latter especially due to the weaving distance between the potential access and the roundabout for traffic wishing to you turn and head northwards. Access for non-motorised users must be via the B2237; access from the A24 would not be supported. This may require a pedestrian phase to be introduced into the existing B2237 Worthing Road signalised junction (to allow pedestrians to cross from the footway on the eastern side of the B2237 into the site) as well as footways through to the proposed site.	Support	Comments noted. The following action will be undertaken: <b>when reviewing the Land West of Petrol Station, Hop Oast proposal regard will be given to the comments on access and accessibility.</b>
119	Hunt	Gerald Eve LLP	Christ's Hospital Foundation	Employment Sites Land West of petrol station, Hop Oast, Southwater (Land to the north of A24 and East of Tower Hill)	Allocate Land to the north of A24 and East of Tower Hill (SA626) for economic use for the following reasons: <ul style="list-style-type: none"> <li>• the constraints and issues outlined in the Council's Issues and Options document can be addressed</li> <li>• there is a shortage of land for B1/B8 industrial/warehouse use in the local area.</li> <li>• the Site would be an attractive location for occupiers seeking start up accommodation of 2,000 sq ft up to 50,000 sq ft or larger.</li> <li>• such uses would complement the uses that currently exist upon the land that surrounds the</li> </ul>	Object	Comments noted. <b>The suggested site at Tower Hill provided in this response will be reviewed.</b>

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					site including a household waste and recycling facility, Park & Ride and petrol filling station. (Officer Note: the site was titled 'Land West of petrol station, Hop Oast, Southwater' in the Council's Issues and Options document and included in the list of sites considered for commercial use)		
1	French	Gatwick Diamond Initiative		Employment Sites Locational Strategy - Adjacent Strategic Roads	The Gatwick Diamond Initiative supports the relaxation of the locational strategy for employment sites in order to support employment growth allocations where they are adjacent to the key strategic road network and consider this to be an excellent proposal.	Support	Support welcomed and noted. <b>No action required.</b>
98	Shakespear	WYG	Wyevale Garden Centre	Employment Sites Locational Strategy - Adjacent Strategic Roads	We support the proposed local plan strategy for economic development, in particular bullet point 8 "Identifying and allocating additional employment areas to meet the identified need for employment growth and inward investment". The Council's strategy for identifying new employment sites could be expanded to make clear that such sites should have "easy access to the district's strategic road network and be able to provide for a range of unit sizes".	Support with Modifications	Support welcomed and comments noted. <b>The information provided in this response will be reviewed.</b>
27	Evans			Employment Sites Locational Strategy - Adjacent Strategic Roads	2.30 Agree with Use of the Strategic Housing & Economic Land Availability Assessment for assessment of the potential economic land availability.2.37 - 2.39 A reasonable assessment would strongly suggest that the strategy for selection of commercial use sites should be relaxed, especially in relation to locations on strategic highways.	Support with modifications	Support welcomed and noted. <b>No action required.</b>
102	Welchman	Armstrong Rigg Planning	Dunmoore	Employment Sites	Support the location strategy for employment sites to be relaxed to include the allocation of sites adjacent key strategic road network	Support with modifications	Comments noted. <b>No action required.</b>

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				Locational Strategy - Adjacent Strategic Roads	subject to site being in a sustainable location close to shops, services and public transport. Sites away from existing settlement boundaries would lead to unsustainable forms of development and the linked economic benefits would be diluted.		
143	Brook	Sussex Wildlife Trust		Employment Sites Locational Strategy - Adjacent Strategic Roads	The Sussex Wildlife Trust is concerned with the number of greenfield sites that have come forward that are outside the Built up Area Boundary.	Object	Comments noted.
145	Brigden	Crawley Borough Council		Employment Sites Locational strategy - Adjacent Strategic Roads (Section 2, para 2.15/2.16 and 2.39)	Question the assumption suggested in paragraphs 2.15 and 2.16 that business park style development close to strategic roads with adequate car parking should “continue to be provided” as this is what the market is seeking, and moving out of town centres. Appears contrary to the sequential test in the National Planning Policy Framework and would undermine directing employment development, particularly offices, to more sustainable locations, closer to public transport routes. Query whether the proposed locational strategy for employment is the most sustainable approach to employment development. In particular, whilst B2/B8 may be, for operational reasons, more appropriately sited in locations with access for HGVs on the strategic road network, town centre and/or near public transport links should be favoured locations for offices (B1).	Object	Comments noted. <b>The information provided in this response will be reviewed when considering office, business park and other employment provision and will seek to clarify the approach in relation to the sequential test.</b>

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138	West	West Sussex County Council		Employment Sites North of Hilland Farm	Appropriate access should be achievable from the A29. The access arrangement into the development should also account for improvements to New Road (for example a four arm roundabout would accommodate the A29 (north and south bound), the development, and New Road). Improvements would be required to provide access for non-motorised users to Billingshurst to the south and this should be reflected in the Local Plan Review.	Support	Comments noted. The following action will be undertaken: <b>when reviewing the North of Hilland Farm proposal regard will be given to the comments on access and accessibility</b>
138	West	West Sussex County Council		Employment Sites North of Lower Broadbridge Farm	North of Lower Broadbridge Farm – The site summary suggests vehicular access could be taken from the Lawson Hunt Roundabout by way of a fourth arm. Due to arm spacing requirements, this would not be possible unless the roundabout is increased greatly in size. An alternative left in left out access would appear feasible in principle, however, with vehicles u-turning at the roundabouts to the immediate north and south. Accessibility for non-motorised users would need to be considered in greater detail at an appropriate time. There are no issues, in principle that should prevent the site from being allocated for development.	Support with modifications	Comments noted. The following action will be undertaken: <b>when reviewing the North of Lower Broadbridge Farm proposal regard will be given to the comments on access and accessibility</b>
138	West	West Sussex County Council		Employment Sites Novartis	In light of the previous and now demolished uses, there are no in- principle issues with this site.	Support	Support welcomed and comments noted. <b>No action required.</b>

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138	West	West Sussex County Council		Employment Sites Nowhurst Business Park	Nowhurst Business Park – Detailed highways matters have already been accepted for part of the site by way of DC/16/2941. DC/17/2131 has been considered by West Sussex County Council but an objection has been raised to this proposal primarily due to the lack of supporting information. There will need to be some joint working between the applicants for the two schemes. In principle, accessibility is a concern, especially ensuring that any measures (shuttle buses for example) are viable in the long term. If allocated, any policy must include specific provision for the development to demonstrate the long term viability of measures to promote sustainable transport amongst employees.	Support with modifications	Comments noted. The following action will be undertaken: <b>when reviewing the Nowhurst Business Park proposal regard will be given to the need to demonstrate the long term viability of measures to promote sustainable transport amongst employees.</b>
139	Shakespear	WYG	Wyvale Garden Centre Ltd	Employment Sites Page 24	Include land at Old Barn Garden Centre, Dial Post, as an employment allocation. The site is highly suited for employment use as it forms previously developed land and is subject to no notable planning or environmental constraints.	Support with Modifications	The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.

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138	West	West Sussex County Council		Employment Sites Rosier Business Park	Although the site has an existing vehicular access, forward visibility (for vehicles turning into the site, crossing the northbound traffic flow as well as for trailing southbound vehicles to see a vehicle turning right into the development) appears restricted. If this site is to be allocated, consideration should be given as to whether visibility can be achieved to the required standards. Specific measures will be needed to improve access by sustainable modes of transport to improve the sustainability of the site and these should be included in the Local Plan Review.	Support with modifications	Comments noted. The following action will be undertaken: <b>when reviewing the Rosier Business Park proposal regard will be given to the comments on access and accessibility.</b>
145	Perks	Billingshurst Neighbourhood Plan Working Group		Employment Sites Rosier Commercial Centre	The Rosier Commercial Centre off the A272 has potential for expansion and offers direct access to the strategic road network. The site is recognised as having the potential to contribute to the district employment land need (p102). The potential can be enhanced by formalising and improving existing used paths to walking and cycling routes to the village, so contributing to minimising personal vehicle access need whilst also supporting access to and from local shops and other services.	Support with Modifications	Support noted. <b>No action required.</b>
98	Whitehead	North Horsham Parish Council		Employment Sites Searles Yard	Adjacent the proposed Key Employment Area at Parsonage Business Park lies Searles Yard site which is under-utilized with potential for further intensification for employment, especially start up and micro-businesses and residential property. It is suggested that the inclusion of residential housing on the site would break up the heavy industrialisation that may occur otherwise.	Object	Comments noted. <b>The potential for housing development or mixed use schemes were not included in this consultation document and will need to be addressed in the next stages of the Local Plan review.</b>

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138	West	West Sussex County Council		Employment Sites South of Hilliers	Access arrangements for both motorised and non-motorised road users will need to be considered in detail, albeit the existing site has a suitable existing access as well as there being a continuous footway towards Horsham. There are no apparent highway constraints that should prevent the site from being allocated for development.	Support	Comments noted. The following action will be undertaken: <b>when reviewing the South of Hilliers proposal regard will be given to the comments on access and accessibility.</b>
11	Bromley	West Grinstead Parish Council		Employment Sites Star Road	Correct maps relating to SHELAA sites SA471 (eg units 1-15 are nothing to do with DC/15/2787 which forms SA471) and SA063 (eg should show just the land outside the built up area boundary)	Object	Comments noted. The comments are not considered to relate to the maps contained within the issues and options consultation document. The SHELAA is subject to review on a regular basis which enables updates to be undertaken as appropriate. In respect of the Local Plan Review - <b>No action required.</b>
107	Griffin	Rural Planning Group	Mr Philip Mills	Employment Sites Land South of Star Road Industrial Estate	Support the proposed site allocation of land south of Star Road Industrial Estate for commercial use. Currently undertaking preliminary work to enable the site to be delivered within 5-10 years, details of which will be shared as the plan progresses. It is clear that providing residential development has not been matched with additional business land allocations and local job creation opportunities. As a result there is a shortage of commercial land and high-grade premises to facilitate expansion and modernisation of existing	Support	Support noted. <b>No action required.</b>

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Page 92					businesses or to attract new inward investment. Therefore, assert that the Council should plan for a minimum of 49 ha of commercial land to 2036 and all proposed new commercial sites should be brought forward.		
	Fox	Quod	Mayfield Market Towns Limited	Employment Sites Sussex Prairies Garden	Sussex Prairies Garden, Moorlands Farm, Wheatsheaf Road, Henfield BN5 9AT: this site extends to approximately 5 hectares. Whilst much of the site is currently in use as the Sussex Prairie garden which is open to the public (which will be retained as part of any future proposals by Mayfields), opportunity does exist to expand the existing commercial facilities on the site. This site should therefore be considered for allocation in the updated local plan as an employment location.	Object (Omission)	The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.

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138	West	West Sussex County Council		Employment Sites West of Hilland Farm	Ideally, both Hilland Farm sites would be considered collectively in terms of vehicular access, albeit a left in, left out access could be achieved to the West Hilland Farm site if the North of Hilland Farm is required to provide a roundabout. In order to ensure that the development can be accessed by sustainable modes of transport, links southwards to Billingshurst should be explored including appropriate means of crossing the A29 for non-motorised users and this should be reflected in the Local Plan Review.	Support with modifications	Comments noted. The following action will be undertaken: <b>when reviewing the West of Hilland Farm proposal regard will be given to the comments on access and accessibility.</b>
Page 93	Dixon	Savills	The Westons Farm Trust	Employment Sites Westons Farm	Allocate land at Westons Farm (c37ha) for employment use to enable the delivery of a commercial business park (B1, B2, B8 and potentially congregational uses in a range of building types). The site is located near the strategic road network and new pedestrian and cycle links could be provided to Warnham Station to the north. It is considered to be a highly sustainable and accessible location. The site has space for a range of business uses and provides an excellent opportunity to help provide for the recognised increasing employment space needs of the local community, the district and the wider Gatwick Diamond. The concerns and constraints raised in the Strategic Housing & Economic Land Availability Assessment (SHELAA) can be resolved. The freeholder is keen to develop and there is strong interest in the site meaning the site is available. The SHELAA: site SA325 assessment should be amended to reflect the site is available, suitable and developable.	Object (Omission)	The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.

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					(Officers note: a plan of the area was submitted)		
Page 94	Brook	Sussex Wildlife Trust		Employment Sites	The Sussex Wildlife Trust strongly suggests that the Council needs to look at these sites and determine the levels of environmental assessments that are required before any sites are proposed for allocation. 5 of the sites reference protected barbastelle bats. 5 of the sites (some differing to those above) reference Ancient Woodland and 2 reference Local Wildlife Sites. Ecological information is needed to inform the council about the sites' realistic suitability for allocation. By gathering and evaluating adequate information now, it will aid the council in considering if proposed allocations are suitable for delivering mitigation in relation to these matters.	Object	Comments noted. As indicated in the Issues and Options consultation document further detailed surveys may be required if development proposed. Public consultation during the plan making process provides respondents an opportunity to submit information they feel should be taken into account including that which may enable or prevent an allocation. <b>The information provided in this response will be reviewed in respect of the Employment Site proposals and regard given to proportionate ecological assessment.</b>

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137	Fielding			Equestrian Development HDPF Policy 29	Horsham District Planning Framework Policy 28 (Equestrian Development) is supported	Support	Support noted. <b>No Action Required.</b>
148	Fielding			Equestrian Development HDPF Policy 29	Horsham District Planning Framework Policy 29 (Equestrian Development) is supported	Support	Support noted. <b>No Action Required.</b>
148	West	West Sussex County Council		General Gatwick	Within the document there are references to the location within the Gatwick Diamond, links to as well as residents travelling to work at Gatwick Airport for jobs and tourism. The lack of reference to links of businesses within Horsham District to the airport is queried.	Object	Comments noted. The following action will be undertaken: <b>a) Regard will be given to the improved reference to the links of businesses within Horsham District to Gatwick Airport in future publications</b>
143	Brook	Sussex Wildlife Trust		General Introduction	The Sussex Wildlife Trust is encouraged to see recognition of the important role of ecosystem services within the introduction (1.3). All areas of Horsham District both urban and rural have the ability to deliver these much relied upon services which form a fundamental part of sustainable development. We ask Horsham District Council to ensure that when considering new sites for allocation or alterations to existing allocations or settlements	Other	Comments noted. The following action will be undertaken: <b>a) when reviewing the proposals regard will be given to the comments on ecosystem services</b>

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					boundaries, that these decisions are informed by adequate environmental information. The council should consider the ecosystem services those sites currently deliver, understand what could be lost and hence where sustainable development can truly be achieved.		
141 Page 96	Howard	South Downs National Park Authority		General SDNP	The South Downs National Park Authority supports the proposed early stages of the strategy in so far as the changes proposed focus growth within a hierarchy of the most sustainable settlements in the District. It is important to stress that Horsham District Council has a duty of regard to the two purposes of a National Park (Section 62 of the Environment Act 1995). This includes assessing the impacts of decisions about development outside of the National Park. Whilst the Council's evidence for housing growth in the Horsham District excludes the National Park area, the South Downs National Park Authority's proposed spatial strategy and housing policy (publicly available) supports a modest amount of growth in smaller villages which includes those in the Horsham District. The South Downs National Park Authority would welcome continuing discussions through the Duty to Co-operate on the potential impact of the proposed strategy within Horsham District on the setting of the South Downs National Park.	Support with Modifications	Support welcomed and comments noted. Horsham District Council <b>welcomes continuing discussions on the potential impact of its proposed strategy on the setting of the South Downs National Park and the duty to have regard to the purposes of a National Park.</b>

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2		Forest Neighbourhood Council		General	We do not see anything that is controversial in our area but we would like to continue to receive further information about this Local Plan	Support	Comments noted. <b>No Action Required.</b>
31	Hyland	Environment Agency		General	No significant comments to make on proposals. However; Water Lane Trading Estate, Storrington and Broadlands Business Campus, Langhurstwood Road, Horsham both fall within flood zone 2. Any development on site would need to consider this. No comments on proposed Built Up Area Boundary amendments.	Observation	Comments noted and the following action will be undertaken: <b>Regard will be given to the sites' location in Flood Zone 2 when assessing the highlighted sites.</b>
Page 97	Johnston	Ashington Parish Council		General	Parish Council in agreement with Local Plan Review	Support	Support welcomed and comments noted. <b>No action required.</b>
	132	Partridge	Mid Sussex District Council	General	Mid Sussex District Council does not foresee any direct implications from the development of employment sites identified in Table 5 and does do not have any further comments to make on the merits of any site options at this stage, the revisions to the built-up area, or the policy proposals and wording changes suggested. The Council supports the statement in paragraph 2.38 that options will be tested to assess the cumulative impact with other development proposals within and beyond the district.	Support	Support welcomed and comments noted. <b>No action required.</b>

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135	Evans	Gladman Developments		General	<p>Many of the issues cannot be fully explored without the housing context and will need to be further considered at the next round of consultation in 2019, when more information on the level of housing growth to be planned for is known. The reasons for the approach taken are noted but the Council must begin to grapple with the increase in its housing needs now, the issues will be complex for the LPA and its HMA wide partners to deal with. The approach taken by Swale should be noted.</p> <p>Gladman are promoting a number of sites in the District which could respond to these needs, as well as solving some of the problems with the lack of progress on Neighbourhood Planning in some areas which was to be a delivery mechanism for housing.</p>	Observation	<p>Comments noted. <b>While this Issues and Options document specifically focused on Employment and Tourism the information provided in this response will be considered as part of the next stage of the Local Plan Review which will be a full assessment of all topics, to include housing.</b></p>
138	West	West Sussex County Council		General	<p>West Sussex County Council expects Local Planning Authorities preparing Local Plans and Parish Councils preparing Neighbourhood Plans to take account of its policy documents and supporting Sustainability Appraisals. Documents include Waste Local Plan, Minerals Local Plan and Transport Plan. Recommend also taking into account County service plans such as Planning School Places and West Sussex Rights of Way Improvement Plans. Infrastructure capacity, eg Schools, and the mitigation that would be needed as result of development, is a key consideration when allocating sites. The County Council will support Horsham District Council to undertake a Strategic Transport Study to test impacts of proposed allocations through Local Plan Review and examine how impacts could be</p>	Observation	<p>Comments noted. The Council welcomes support from the County Council when undertaking a Strategic Transport Study and <b>will continue to have regard to County Council policy documents, sustainability appraisals and service plans</b> in the preparation of the Local Plan Review.</p>

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Page 99					mitigated. Transport evidence base for Local Plan Review will need to comply with National Planning Policy Framework. Evidence will need to ensure development scenarios, with mitigation, provide confidence that the package of local transport infrastructure improvements and smarter choice measures is likely to provide sufficient mitigation so that any residual cumulative impacts would not be severe.		
	Parrott	Waverley Borough Council		General	Waverley acknowledges the effort taken by Horsham in seeking to meet the needs of businesses and to support economic growth and sustainable development. As a general comment and as a neighbouring authority, we would encourage discussion at an officer level about any potential cross-boundary impacts arising from development proposed as part of your Local Plan Review, in particular any transport impacts and traffic implications of development on cross-boundary routes, particularly the A281.	Support	Support welcomed and comments noted. Horsham District Council fully supports and welcomes joint working and the exploration of cross-boundary implications including traffic on cross-boundary routes. In respect of the Issues and Options - <b>No action required.</b>
	142	Byrne	Historic England South East		General	These comments are provided for general guidance in the iterative process of preparing appropriate policies for the historic environment. We would welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the National Planning Policy Framework (Paragraphs 9, 126, 132, 137, 156, 157). The local plan needs to assess whether or not	Support with Modifications

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Page 1 10					<p>it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment. The policies and proposals throughout all sections of the plan should be tested against the potential effects they will have on the historic environment and the significance of heritage assets.</p> <p>This will be a key test of the soundness of the plan and the achievement of sustainable development as defined in the National Planning Policy Framework when it is subject to examination.</p>		
	Franklin	Highways England		General	<p>We are satisfied that the proposals will not materially affect the safety, reliability and / or operation of the Strategic Road Network (the tests set out in Department for Transport C2/13 para 10 and Department for Communities &amp; Local Government National Planning Policy Framework para 32). Therefore, the only observation we have is that the plan review refers to the A24, A28, A281, A264 and the A272 as the Strategic Road Network, but please note that these roads are managed by West Sussex County Council and are therefore not part of the Strategic Road Network, which is managed by Highways England (for example the M23 and A23).</p>	Observation	Comments noted. <b>The terminology will be updated in future documentation to make this distinction clear.</b>

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50	Burroughs	Slinfold Parish Council		KEA Brinsbury College	The Council notes the inclusion of a large site at Brinsbury College (shown on page 107 in Appendix 1, section 3). Should this go ahead, this will result in considerable heavy goods traffic using the A29 north to Five Oaks and then continuing on roads either side of Slinfold Parish – either along the A264 to Newbridge, which is already very busy at peak times, or via the A29.	Object	Comments noted. <b>The traffic impacts on the A29 and A264 will be considered as part of the local plan review process.</b>
98	Whitehead	North Horsham Parish Council		KEA Broadlands Business campus	Broadlands Business campus, Langhurstwood Road. The site is not appealing and when the new development has been built access will be through residential property. It is felt that the cumulative effect of traffic and congestion associated with the employment sites in the Langhurstwood Road area should be taken into account before any further allocation of land for employment is considered.	Object	Comments noted. <b>The information provided in this response will be considered as part of the local plan review process.</b>
145	Brigden	Crawley Borough Council		KEA Broadlands Business Campus & Graylands Estate	Crawley Borough Council expects that the cumulative traffic impact on the A264 and other routes into Crawley will be assessed as part of the Graylands Estate and Broadlands Business Campus proposals, alongside other committed and anticipated developments as part of a comprehensive modelling exercise. Crawley Borough Council would welcome being involved in this assessment and request this work be carried out jointly.	Observation	Comments noted. Horsham District Council supports and welcomes the offer of joint working. <b>Work on cumulative traffic impacts has been programmed for the next stages of the local plan review process.</b>
102	Welchman	Armstrong Rigg Planning	Dunmoore	KEA Daux Road Industrial Estate	No objection to Daux Road Industrial Estate retaining its KEA status.	Support	Support noted. <b>No action required.</b>
102	Welchman	Armstrong Rigg Planning	Dunmoore	KEA Gillmans Industrial Estate	No objection to Gillmans Industrial Estate retaining its KEA status.	Support	Support noted. <b>No action required.</b>

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128	Greene	Surrey County Council		KEA Gillmans Industrial Estate	In relation to flooding, we have a minor comment to make to the Gillmans Industrial Estate site allocation on p.75. The section on flooding states that 'the site is accessed directly off Natts Lane. The entrance from Natts Lane is subject to flooding.' We suggest that it should be made clear as to whether this is fluvial flooding (from a river) or pluvial (from surface water)	Support with Modifications	Comments noted. <b>The information provided in this response will be reviewed and updated as appropriate.</b>
98	Brook	Sussex Wildlife Trust		KEA Graylands Estate	Graylands Estate, Langhurstwood Road, Horsham site description indicates it is abutting Ancient Woodland. This site is then also listed in the section relating to land put forward for consideration for commercial use (page 105). We ask the council to carefully consider the suitability of the site for allocation and ensure that appropriate wording is in place to stipulate buffers to protected Ancient Woodland should the site progress.	Object	Comments noted. The following action will be undertaken: <b>The information provided in this response will be reviewed in respect of the Graylands Estate Key Employment Area proposals and potential further employment allocation and regard given to the adjacent Ancient Woodland and a buffer area.</b>
98	Whitehead	North Horsham Parish Council		KEA Graylands Estate	The Parish Council would support the recommendation that Graylands Estate is designated as a Key Employment Area	Support	Support welcomed and noted. <b>No action required.</b>
46	Johnson	Langhurstwood Road Residents Group		KEA Graylands Estate, Langhurstwood Road	The road network is already overheated and no further development should be permitted until the completion of highway improvements covered in the Liberty project for North of Horsham.	Object	Comments noted. <b>The information provided in this response will be taken into account when Graylands Estate is reviewed.</b>

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61	Grant	Henfield Parish Council		KEA Henfield Business Park	The Parish Council supports the designation of Henfield Business Park as a Key Employment Area, and adds that there is scope for the Henfield Business Park site to be extended on the other side of the A2037, to include the sites identified for business use as part of the emerging Neighbourhood Plan.	Support with Modifications	Support welcomed and comments noted. <b>The information provided in this response will be considered through the next stages of the local plan review.</b>
59 Page 103	Burroughs	Slinfold Parish Council		KEA Hilland Roundabout	The Council notes the inclusion of two sites at Hilland Roundabout, Billingshurst (shown on pages 100 and 101 in Appendix 1, section 3). Should these go ahead, this will result in considerable heavy goods traffic using the A29 north to Five Oaks and then continuing on roads either side of Slinfold Parish – either along the A264 to Newbridge, which is already very busy at peak times, or via the A29.	Object	Comments noted. <b>The information provided in this response will be taken into account when the two Hilland Roundabout sites and the impacts on the A29 and A264 are reviewed.</b>
115	Perks	Billingshurst Neighbourhood Plan Working Group		KEA Huffwood & Eagle Trading Estate, Daux Road Industrial Estate and Gillmans Industrial Estate	Views have been expressed at public consultations and at Group meetings of a desire for alternative sites being available close to the village but with direct access to the A29 and/or A272, thereby removing HGVs and other traffic from residential streets. The developing Local Plan could support and incentivise this ambition, enabling the existing sites to be redeveloped for more complimentary and modern uses.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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102	Welchman	Armstrong Rigg Planning	Dunmoore	KEA Huffwood Trading Estate	Remove Huffwood Key Employment Area status and allocate land north of Hilland Farm to relocate the businesses there.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
Page 104	Burroughs	Slinfold Parish Council		KEA Land at Lower Broadbridge Farm	<p>Sites Put Forward for Consideration, table 5</p> <p>The Council is very concerned by the proposal to include Land at Lower Broadbridge Farm (shown on page 98 in Appendix 1, section 3) as a Key Employment Area:</p> <ul style="list-style-type: none"> <li>• This is an area of greenfield land, with a footpath running east-west through it, which is frequently used by walkers and dog-walkers. There is no existing defensible boundary, particularly to the west. The Council notes that it has previously been assessed, with good reason, as having no capacity or low capacity for employment development;</li> <li>• It is fairly flat, low-lying land which is at risk of flooding from the tributary of the Arun River that runs along its northern edge;</li> <li>• The proposed site is right next door to a residential property situated on slightly higher ground to the north that would suffer considerable intrusion;</li> <li>• There is no public transport available to the site and no pedestrian access: all those employed will have to arrive in private transport;</li> <li>• It should be noted that the statements about</li> </ul>	Object	Comments noted. <b>The information provided in this response will be taken into account when Land at Lower Broadbridge Farm is reviewed.</b>

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Page 105					<p>proximity of this site to services and facilities are misleading: the “small shop on the Billingshurst Road” would have to be accessed by car via the Newbridge roundabout and then through Broadbridge Heath, a journey almost as long as going to the Tesco supermarket. People driving to the shop will also find it difficult to park following recent highways changes undertaken by West Sussex County Council;</p> <ul style="list-style-type: none"> <li>• With goods vehicles emerging onto the Lawson Hunt roundabout, this will considerably add to an already busy road. While access south and east to the A24 is suitable for large goods vehicles, the routes north and west on the A281 and the A29 are not;</li> <li>• This site is likely to encourage applications for re-development of Lower Broadbridge Farm and new development on the land to the west and southwest, which will substantially eat into the “strategic gap” that Slinfold Parish wishes to retain (and is set out in the draft Neighbourhood Plan, which is supported by Horsham District Council and the Neighbourhood Plan Examiner).</li> </ul>		
	101	Da Silva	DMH Stallard LLP	Sweeptech Environmental Services and Edburton Contractors Ltd	KEA Land North of The Old Brickworks, Henfield	<p>Agree with the approach taken by the Council with the review of Key Employment Areas. Submit Land North of the Old Brickworks as a potential Key Employment Area. It has direct access to the Strategic Road Network via the A281 which runs to the east of the site and it is sustainably located. Site is currently used as grazing land but is surrounded by commercial sites and the sites to the north, south and the other side of Shoreham Road to the east are all</p>	Object (Omission)

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Page 106					business sites. It benefits from direct vehicular access onto Shoreham Road and is well screened by existing trees. The site is located approximately 1.2km from Henfield and approximately 550m from Small Dole (see map attached to representation). In addition, by including land north of the Old Brickworks approximately 2 hectares of additional land will be available for employment space and will help make significant contribution to need for commercial space in the District, particularly in the south. Site is available now, with no ownership issues and it is free from any statutory designations. It could be delivered immediately. Important to note that the site was submitted for allocation to Henfield Neighbourhood Plan Steering Group.		
	151	Mace		KEA Land West of Hop Oast	Object to proposed development of the Land West of Hop Oast for commercial use. Horsham and Southwater bypasses should retain their relative rural settings.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
	50	Burroughs	Slinfold Parish Council	KEA Lawson Hunt Industrial Park	The Council agrees with the retention of the Lawson Hunt Industrial Park with no change to its current boundaries (shown on page 76 in Appendix 1, section 1).	Support	Support welcomed and comments noted. <b>No action required.</b>

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100	Da Silva	DMH Stallard LLP	Hopegar Properties Ltd	KEA Mackley Industrial Estate	Support recommendation to retain Mackley Industrial Estate as Key Employment Area. However, request boundary review to include open storage (B8) area located immediately south of the boundary. It is an integral part of existing estate and considered logical to include. It is included within the defined Built Up Area Boundary of Small Dole and would not involve the loss of any land designated as countryside. Inclusion of the site which is approximately 1.1 hectares will help make significant contribution to the need for commercial space in the District. Land south of Mackley Industrial Estate is available now and free from statutory designation. To allocate as employment land would allow sufficient flexibility to help accommodate additional employment needs of the District.	Support with modifications	Support welcomed and comments noted. <b>The boundary of the Mackley Industrial Estate KEA will be reviewed.</b>
143	Brook	Sussex Wildlife Trust		KEA Mackley Industrial Estate	Mackley Industrial Estate should makes reference to the need for appropriate buffers around the Ancient Woodland and Local Wildlife Site (Tottington Wood) should this allocation undergo any changes.	Object	Comments noted. The following action will be undertaken: <b>The information provided in this response will be reviewed in respect of the Mackley Industrial Estate Key Employment Area and appropriate buffers</b>
61	Grant	Henfield Parish Council		KEA Mackleys	The Parish Council notes that Mackleys at Small Dole continues to be classed as a Key Employment Area (Officer note: no objection raised to this)	Support	Support welcomed and noted. <b>No action required.</b>

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Page 108	50	Burroughs	Slinfold Parish Council		KEA Maydwell Avenue	The Council is concerned by the inclusion of Land at Maydwell Avenue (shown on page 111 in Appendix 1, section 3) as a potential Key Employment Area. Development of this site is very likely to result in more vehicles commuting through Slinfold village between the A29 and the A264 (the Parish's Speedwatch group has demonstrated that such commuting contributes substantially to traffic volumes and to the incidence of speeding within the Parish). This site is also liable to flooding, making it unsuitable for substantial development.	Object	Comments noted. <b>The information provided in this response will be taken into account when the Land at Maydwell Avenue and the impacts on traffic through Slinfold and flood risk are reviewed.</b>
	Burroughs	Slinfold Parish Council		KEA Maydwell Business Park	The Council agrees with the proposal to designate the Maydwell Business Park as a Key Employment Area (shown on page 95 in Appendix 1, section2).	Support	Support noted. <b>No action required.</b>	
10	Pope	Boyer Planning	Taylor Wimpey	KEA Maydwell Business Park, Slinfold	We support the Council's proposed allocation of Maydwell Business Park as Key Employment Areas for the following reasons: <ul style="list-style-type: none"> <li>• it will help to provide an appropriate level of employment for residents given the Slinfold Neighbourhood Plan includes housing allocations</li> <li>• the land benefits from excellent connections to the strategic network and lies within close proximity to sustainable settlements</li> <li>• it will help protect the level of employment that currently exists at the site and unlock the long-term growth of Slinfold</li> </ul>	Support	Support welcomed and comments noted. <b>No action required.</b>	

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49	Day	Denne Neighbourhood Council		KEA Nightingale Road	Nightingale Road Site (page 18): Horsham Denne Neighbourhood Council does not know if there is one or more owners of this area but would wish to see considerable improvement of this currently run-down and under-used site. We agree that access is difficult for large vehicles and note the recent residential development at Horsham Gates on the opposite side of the railway line, and the proximity of the Premier Inn hotel; consequently we suggest that change of use to residential and/or another hotel may be preferable.	Object	Comments noted. <b>The information provided in this response will be reviewed and consideration given to the provision of residential and/or hotel on the Nightingale Road Site.</b>
Page 109	Whitehead	North Horsham Parish Council		KEA North Heath Lane Industrial Estate	The Parish Council would support North Heath Lane Industrial Estate becoming a Key Employment Area	Support	Support welcomed and noted. <b>No action required.</b>
	50	Burroughs	Slinfold Parish Council	KEA Nowhurst Business Park	The Parish Council has previously set out its preference for a mixed residential-employment development on the Nowhurst Business Park site (shown on page 99 in Appendix 1, section 3), where employment development has recently been permitted. Accordingly, the Parish Council believes that this site should not be designated as a Key Employment Area.	Object	Comments noted. <b>The information provided in this response will be taken into account when the Nowhurst Business Park site reviewed.</b>
147	Tobin	Southwater Parish Council		KEA Oakhurst Business Park & Southwater Business Park	Representation received in two parts; original letter followed by clarification email. The Parish Council has no objection to the inclusion of Oakhurst Business Park, Southwater	Support	Support noted. <b>No action required.</b>

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					Business Park as key employment zones as proposed.		
98	Whitehead	North Horsham Parish Council		KEA Parsonage Business Park	The Parish Council supports the Parsonage Business Park being designated as a Key Employment Area.	Support	Support welcomed and noted. <b>No action required.</b>
139	Savill	Washington Parish Council		KEA Rock Common Business Park	The Parish Council would support the proposed designation of the Rock Business Park as new Key Employment Area (KEA) in line with the Storrington, Sullington and Washington Neighbourhood Plan.	Support	Support welcomed and comments noted. <b>No action required.</b>
136	Gibbs	Savills	Crest Strategic Projects and Bellway Homes Limited	KEA Rosier Business Park	Allocate Rosier Business Park as Key Employment Area or allocate for employment as part of a wider residential led mixed use development, taking into account the amended boundary submitted as part of this representation which excludes land to the west. The Rosier Business Park offers an opportunity to provide enhanced local employment in this sustainable village location, with improvements to the existing buildings and greater opportunities for connections between the Rosier Business Park, Billingshurst centre, and railway station. Employment re-provision at Rosier Business Park should be required as part of a new residential community to the east of Billingshurst. The following key factors will influence the opportunity for the Rosier Business Park to make a contribution towards the local economy and wider Gatwick Diamond: • The need for the Regulation 18 consultation to influence the HDPF Review and HDC need	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Page 111					<p>not seek to progress a separate plan focusing on employment and tourism only;</p> <ul style="list-style-type: none"> <li>• The need for the consultation to be utilised to inform the Neighbourhood Plan for Billingshurst;</li> <li>• HDC should ensure any new or reconfigured employment floorspace is designed to maximise economic benefits to Billingshurst and the wider Gatwick Diamond economy;</li> <li>• HDC need to ensure that high quality commercial floorspace is provided that better meets the needs of local businesses and modern business operations;</li> <li>• The facilities are more intensively occupied and better meet the growing demand for B1a / B1c floorspace; potentially as flexible workspace for local small and medium-sized enterprises (SMEs);</li> <li>• If the facilities are not more intensively occupied, a smaller area is allocated at the existing Rosier Business Park to reflect the lower intensity of use; and</li> <li>• Overall that the reconfigured Rosier Business Park is better connected to the existing village centre services and amenities, including the nearby train station.</li> </ul> <p>At present there is no set decision on the layout of development or where the Rosier Business Park facilities will be provided. However, CSP and Bellway are currently considering two options, namely:</p> <ol style="list-style-type: none"> <li>i. Reconfiguring and improving the existing layout of the Rosier Business Park to provide improved facilities and increased floorspace within the same Rosier Business Park footprint,</li> </ol>		

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Page 112					<p>which will also enable better linkages between the existing residential estate and the adjacent train station; or</p> <p>ii. Retain the Rosier Business Park as it is currently.</p> <p>The SHELAA review of the site should be amended to reflect Rosier Business Park contributes to current employment provision upgrades can be delivered within both the 5 year and 6-10 year periods</p>		
	88	Connell	Jones Lang LaSalle Ltd	Sony DADC UK Limited	KEA Southwater Business Park	<p>We oppose the proposed designation of Southwater Business Park in its entirety as a Key Employment Area because the Sony factory should not be included for the following reasons:</p> <ul style="list-style-type: none"> <li>• The initial recommendation that Southwater Business Park should be designated as a KEA is flawed, as it did not anticipate the closure of the Sony factory which produced CDs and DVDs.</li> <li>• Such a restriction may blight the future development of the Sony facility.</li> <li>• A redeveloped site is a more suitable and sustainable location for new housing. This is</li> </ul>	Object

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Page 113					supported by the adopted HDPF in terms of settlement hierarchy/within built up area boundary of Southwater (Policy 3), effective use of brownfield land (Policy 2), sustainable development/close to local services and facilities (Policies 1 and 18), meaningful contribution to housing supply (Policy 15), deliverable housing site/vacant from June 2018, contextually fitting as it is surrounded on three sites by residential development and adjacent a country park and Ancient Woodland which could be harmed by intensification of employment uses due to noise and heavy goods vehicles etc (Policies 31 and 33), there are alternative employment land opportunities as highlighted in the Local Plan Review consultation document. • Any KEA boundary should be amended to remove the Sony site from the designation and allocated for residential.		
	50	Burroughs	Slinfold Parish Council	KEA Spring Copse Business Park	The Council agrees with the proposed designation of the Spring Copse Business Park as a Key Employment Area (shown on page 94 in Appendix 1, section 2).	Support	Support welcomed and comments noted. <b>No action required.</b>

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10	Pope	Boyer Planning	Taylor Wimpey	KEA Spring Copse Business Park, Slinfold	We support the Council's proposed allocation of Spring Copse Business Park as Key Employment Areas for the following reasons: - it will help to provide an appropriate level of employment for residents given the Slinfold Neighbourhood Plan includes housing allocations - the land benefits from excellent connections to the strategic network and lies within close proximity to sustainable settlements - it will help protect the level of employment that currently exists at the site and unlock the long-term growth of Slinfold - the site is fully occupied by a mix of B2 and B8 uses	Support	Support welcomed and comments noted. <b>No action required.</b>
35	Burroughs	Slinfold Parish Council		KEA Table 4	Key Employment Areas, table 4 The Parish Council is concerned with the overall number and size of employment areas being proposed for Slinfold Parish. Our evidence clearly suggests that there are more jobs within the Parish than there are employed people living here. We have seen one of the results of this in the clear evidence of commuters driving through the centre of the village (shown in Speedwatch statistics). The Parish Council feels that the Parish has more than done its fair share in supporting employment within the District and should not now be required to absorb even more.	Object	Comments noted. <b>The information provided in this response will be reviewed and regard given to the sustainability of providing additional employment in Slinfold.</b>
35	Read	Storrington & Sullington Parish Council		KEA TESLA	Consolidation of TESLA seems inevitable, members oppose any further creep.	Observation	Comments noted. <b>No action required.</b>
101	Da Silva	DMH Stallard LLP	Sweeptech Environmenta	KEA	Agree with approach taken by the Council in the review of Key Employment Areas. Submit	Object (Omission)	The suitability of this site will initially be considered

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Page 115			I Services and Edburton Contractors Ltd	The Old Brickworks, Shoreham Road, Henfield	The Old Brickworks site as a potential Key Employment Area. Site is located on Strategic Road Network with direct access from A281 which provides connections with Horsham and Steyning. Currently used as grazing land but surrounded by commercial sites. The site benefits from direct vehicular access on to Shoreham Road and is well screened by existing trees in a sustainable location. The addition of this site, approximately 3 hectares, will help to make a significant and immediate contribution to the additional employment land required. It is available now, has no ownership issues and is free from any statutory designations. The site has previously been allocated as an employment site within the Henfield Neighbourhood Plan.		through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.
	Read	Storrington & Sullington Parish Council		KEA Wiston & Rock Common Business Parks, Washington	Support designation of Wiston and Rock Business Parks in Washington as Key Employment Areas, in line with Storrington & Sullington and Washington Neighbourhood Plan.	Support	Support welcomed and comments noted. <b>No action required.</b>
	139	Savill	Washington Parish Council		KEA Wiston Business Park	The Parish Council would support the proposed designation of the Wiston Business Park as new Key Employment Area (KEA) in line the Storrington, Sullington and Washington Neighbourhood Plan.	Support

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1	French	Gatwick Diamond Initiative		KEA	The Gatwick Diamond Initiative supports all changes to the Key Employment Areas. Any increase in employment land is welcomed.	Support	Support welcomed and comments noted. <b>No action required.</b>
27	Evans			KEA	Review is correct in favouring small modifications rather than substantial change. 2.24 The requirement for any redevelopment to follow a 'sequential test' is a less than flexible constraint. Why not state that 'normally the policy requires'? 2.30 Agree with Use of the Strategic Housing & Economic Land Availability Assessment for assessment of the potential economic land availability.	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
134	Swale	Dominic Lawson Bespoke Planning	Our Place	KEA	Support additional protection for existing Key Employment Areas and the designation of new Key Employment Areas in sustainable locations.	Support	Support welcomed and noted. <b>No action required.</b>
143	Brook	Sussex Wildlife Trust		KEA	Of the 8 new Key Employment Area we highlight the lack of ecological information at this stage to make informed comments. We ask the council to consider these sites in the context of the GI Network and the opportunities and constraints they might pose.	Object	Comments noted. The following action will be undertaken: <b>The information provided in this response will be reviewed in respect of the Key Employment Area proposals and the proportionate regard to be given to ecology / GI network.</b>

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60	Hall	Nuthurst Parish Council		Local Planning Context Chapter 1, para 1.9	The statement about “.. protecting the essential rural character” is welcomed.	Support	Support welcomed and noted. <b>No action required.</b>
106	Gibbs	Savills	Crest Strategic Projects and Bellway Homes Limited	Local Planning Context Land East of Billingshurst	The District Council is urged to move forward with the draft revised Local Plan so that all the pertinent land use issues can be considered in the round. Employment and tourism sites should not be considered independently. The land east of Billingshurst is being promoted for residential development (circa 700 dwellings). The land east of Billingshurst comprises three land parcels with a collective area of 70.23 hectares and its western boundary adjoins the built up area of Billingshurst. The land is covered by SHELAA sites SA049, SA569 which lie within the wider site SA118. An evidence base has been submitted as part of the promotion of the land east of Billingshurst. It was initially included in the HDPF for allocation but removed because the District Council decided to leave additional housing allocations, applicable to the end of the plan period, for review. The Examiner was clear a review would be required, in part due to a c.2,000 dwelling shortfall towards the end of the plan period. The site offers an opportunity for a comprehensive residential led mixed use development which improves the offer of the Rosier Business Park (circa 6ha) whilst also providing much needed housing for this area. Rosier Business Park which is not currently allocated in the Horsham District Planning Framework lies within the site and should be allocated for employment as part of a wider residential led mixed use development (Officers	Object	Comments noted. <b>While this Issues and Options document specifically focused on Employment, Tourism and Sustainable Rural Development the information provided in this response will be considered as part of the next stage of the Local Plan Review which will be a full assessment of all topics, to include housing.</b>

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Page 118					note: the allocation of Rosier Business Park is addressed under a separate representation). Alternatively the Council should proactively influence the inclusion of the site in the Billingshurst Neighbourhood Plan.		
	121	Shephard	Barton Willmore	Taylor Wimpey	Local Planning Context	Object to this partial review, a review should be undertaken holistically, taking account of all matters together which will inevitably interrelate. The draft NPPF2 seeks a single Local Plan rather than multiple DPD documents. The HDPF Inspector provided two reasons why the plan should be reviewed within three years of adoption: 1) a review of the housing requirement in light of the government decision for a third runway for London Airports and 2) to identify areas for new housing development needed towards the end of the Plan period (to include sites within the maximum limit of Neighbourhood Plan sites, approx. 150 units, and strategic allocation, 500+). Funding for a third runway at Heathrow has been agreed however this does not preclude expansion at Gatwick eg increased use of its emergency runway, which could	Object

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Page 119					<p>increase housing/employment need in the area.</p> <p>The Inspector made clear that any review should consider the housing requirement of the District, together with the surrounding authorities. Consideration should be given to the changing nature of the surrounding area since adoption, including the 3,700 homes shortfall in the SDNP submission plan. As a relatively unconstrained Authority adjacent to and partially within the SDNP Horsham should respond to their duty to co-operate. To achieve this in a sustainable and joined up way the Council must consider housing need alongside employment need, taking into account the draft NPPF2 and potential increase in dwellings per annum of 974+ plus account given to unmet need from neighbouring authorities and growth at Gatwick. Prompt review of the housing need for the District is necessary to inform emerging Neighbourhood plans and to accord with the draft NPPF2.</p>		
	134	Swale	Dominic Lawson Bespoke Planning	Our Place	Local Planning Context / Sustainable Rural Development	<p>The review is not sufficiently robust and will fail to meet development requirements in an appropriate sustainable manner if countryside restrictions are not altered to allow development on otherwise suitable, available and sustainably located land) Support the overall direction in policy to promote sustainable rural development and objective to ensure those who live and work in the countryside are able to do so. However the review is not sufficiently robust, and is based on an unstated presumption against development in the countryside, even for sites</p>	Object

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Page 120					<p>that are not subject to statutory designations, leaving 85% of the District subject to significant restrictions. This will prevent the District from meeting the development demands. The policy proposals (Policies 26, 28, 20, 10, 11 and 28) do not go far enough in providing sufficient scope for development in those parts of rural Horsham that are able to provide for sustainable development. The strategies identified are a good starting point, but are not enough to combat the issues Horsham is facing (as identified in the Issues and Options consultation at paragraph 2.5 eg lack of B1 and B8 uses, increasing out-commuting, and many low paid jobs in the District). Which are in turn compounded by the lack of affordable housing, forcing younger families to leave the District. Given that 85% of the District is countryside and the increase in the rural population, the countryside will have to take more development to be sustainable. Successful, sustainable settlements provide for a variety of uses, relatively high residential density, a diverse population, small blocks with a network of interconnected streets, and a sufficient concentration of people to support a local economy within the settlement. The evidence must be updated as quickly as possible to understand the future development needs taking into account the increase in housing requirements and revised NPPF paragraph 84 (rural business and community needs may have to be found outside settlements) In this context, we believe that the Council will need to be considering the allocation of larger, mixed</p>		

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					use sites, outside existing settlements, in the next stage of its Local Plan Review. We would make the point that mixed use sites, which provide employment, housing, schools, and recreational opportunities, all underpinned by excellent infrastructure including green infrastructure, landscaping and transport provision, are likely to be the most sustainable solution to the development needs of Horsham in the medium to long term.		
145 Page 121	Brigden	Crawley Borough Council		Other Evidence & Joint Working	Crawley Borough Council look forward to early engagement and to working positively with Horsham District Council, including on joint evidence base and strategic and cross-boundary matters, to seek positive solutions to the challenging strategic issues, as well as detailed matters on our boundary. It is anticipated this will involve evidencing our strategic work in the form of formally agreed Statements of Common Ground for each of the key preparation stages for our respective Local Plan reviews.	Observation	Comments noted. Horsham District Council supports and welcomes the offer of joint working <b>and also anticipate the production of formally agreed Statements of Common Ground.</b>
104	James	ECE Planning	Plymouth Brethren	Other Faith based community needs	The development plan must take into account and meet the needs of faith based communities. The Plymouth Brethren Christian Church is long established in the area and population growth is expected in the District over the Plan period. There are a significant range of requirements to be considered and recognised within the Horsham development plan particularly in relation to the need to provide: <ul style="list-style-type: none"> <li>• Places of worship – This is a vital component in the sustainability of a faith community and the single biggest issue in this whole process.</li> </ul>	Support with modifications	Support welcomed and comments noted. <b>While this Issues and Options document specifically focused on Employment, Tourism and Sustainable Rural Development the information provided in this response will be considered as part of the next stage of the Local Plan Review</b>

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Page 122					<p>There is a current need for 1-2ha site for a principal place of worship (Gospel Hall) and over plan period it is expected a further 3 to 4 meeting hall sites, requiring a quarter of a hectare each, will be needed within Horsham and surrounding authority areas;</p> <ul style="list-style-type: none"> <li>• Independent primary and secondary education facilities – This is considered to be pressing in Horsham. Ensuring that sufficient choice of school places is available for communities is not an option, but a requirement;</li> <li>• New employment, industrial and business space -The need to strengthen the role of employment generators in the local area is part of the process of creating a sustainable community. The group has a keen interest in the promotion of a business park of some 4ha which could provide 8-10 units for small businesses. It is expected employment space requirements will increase during plan period;</li> <li>• Appropriately sized and available family housing;</li> <li>• Care homes for elderly members of the Church; and</li> <li>• Burial grounds – to serve the faith community.</li> </ul> <p>Policy makers must focus more specifically on the role of the voluntary sector and faith communities and provide for their space needs. The NPPF paragraphs 7, 17, 72, 158, 171 have not be truly reflected in the development plan. Horsham’s planning policy framework should reflect more specifically these requirements and promote vigorously more inclusive society recognising shared values and issues but not</p>		<p><b>which will be a full assessment of all topics.</b></p>

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					forgetting the distinct need of different groups. A third of faith groups do not share premises because they are regarded as sacred to a faith. In conclusion, it is clear that there is a need to remove significant obstacles, which currently hinder faith based communities from fully playing their role as vital and thriving contributors to the local area.		
60	Hall	Nuthurst Parish Council		Other Gypsies and Travellers (Chapter 1, para's 1.6 and 1.7 in Issues and Options 2018)	The current position in 1.6 and 1.7 on Gypsies and Travellers is noted. Land to meet this need should be found in, or adjacent to, urban areas with the full range of services and not in unsustainable locations in rural villages and the countryside.	Other	Comments noted. <b>The information provided in this response will be reviewed when considering sites for Gypsies and Travellers.</b>
55	Mellor	Barton Willmore	Gleeson Strategic Land and the Ivor Warren Trust	Other Lower Broadbridge Heath Farm, Broadbridge Heath	Allocate Lower Broadbridge Farm for residential let mixed used development (part of Strategic Housing & Economic Land Availability Assessment site SA102 and SA386). The Masterplan (see appendix 4 of representation) seeks to align with existing development in Broadbridge Heath, with employment uses located to the north of the site and residential uses to the south. The site is west of Broadbridge Heath and adjoins the existing Built Up Area Boundary. To the east (A281) and south (A264) the site is bound by the strategic road network. To the south west the site is bound by the River Arun, small areas of the site in close proximity to the river are identified as being flood zone 2 or 3. The majority of the site is flood zone 1. The site is not located within or in close proximity to any landscape or ecological designations.	Support with modifications	Support welcomed and comments noted. <b>While this Issues and Options document specifically focused on Employment and Tourism the information provided in this response will be considered as part of the next stage of the Local Plan Review which will be a full assessment of all topics, to include housing.</b>

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121	Shephard	Barton Willmore	Taylor Wimpey	Other Neighbourhood Plan needs data	A full review of housing and employment needs should be undertaken to help Neighbourhood Plan Groups, such as Ashington which is at an early stage of preparation and considering potential allocation sites and Henfield which is progressing towards Regulation 14 consultation, to understand the overall need for both employment and housing and to allocate housing accordingly. If this is not achieved, there is an increased risk that the emerging Neighbourhood Plans would be required to go under an early review following their adoption.	Object	Comments noted. <b>While this Issues and Options document specifically focused on Employment and Tourism the information provided in this response will be considered as part of the next stage of the Local Plan Review which will be a full assessment of all topics, to include housing.</b>
121	Shephard	Barton Willmore	Taylor Wimpey	Other Policy 2 - Ashington	The Spatial strategy for development set out in Policy 2 which focuses development in and around Horsham together with strategic allocations and development in existing settlement patterns may no longer be the most appropriate. Given the substantial increase in housing need, additional allocations and a review of how housing and employment is distributed across the District should be made. Medium village settlements (Tier 3), such as Ashington, should not be undervalued as sustainable locations to accommodate growth through allocations within Local or Neighbourhood Plans. This is particularly the case for Ashington where its range of facilities and services make it a suitable location for growth.	Object	Comments noted. <b>While this Issues and Options document specifically focused on Employment and Tourism the information provided in this response will be considered as part of the next stage of the Local Plan Review which will be a full assessment of all topics, to include housing.</b>

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121	Shephard	Barton Willmore	Taylor Wimpey	Other Policy 2 - Henfield	The Spatial strategy for development set out in Policy 2 which focuses development in and around Horsham together with strategic allocations and development in existing settlement patterns may no longer be the most appropriate. Given the substantial increase in housing need, additional allocations and a review of how housing and employment is distributed across the District should be made. Small town or large village settlements (Tier 2), such as Henfield, should be recognised as sustainable locations to accommodate growth. Henfield is well placed to accommodate some of the District's housing need.	Object	Comments noted. <b>While this Issues and Options document specifically focused on Employment and Tourism the information provided in this response will be considered as part of the next stage of the Local Plan Review which will be a full assessment of all topics, to include housing.</b>
125	Swale	Dominic Lawson Bespoke Planning	Our Place	Other Policy 2 of HDPF	The extent of growth required in Horsham in the next plan period is such that Policy 2 of the HDPF is likely to be unsustainable. Existing settlements have taken a lot of development not least North Horsham and the identification of secondary settlements is a logical next step but will not be sufficient to meet the future needs. The Policy should be amended to allow for the identification of one or more new settlements in Horsham.	Object	Comments noted. <b>While this Issues and Options document specifically focused on Employment and Tourism the information provided in this response will be considered as part of the next stage of the Local Plan Review which will be a full assessment of all topics, to include housing.</b>

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134	Swale	Dominic Lawson Bespoke Planning	Our Place	Other Policy 3 of HDPF	Support the creation of a new category of “secondary settlements” to allow development in existing smaller settlements such as Adversane. This should lead to an amendment to existing Policy 3 (settlement hierarchies) to identify new “Secondary Settlements”.	Support with Modifications	Support welcomed and comments noted. The following actions will be undertaken; <b>a) Policy 3 will be reviewed taking into consideration a need to identify new Secondary Settlements as part of the local plan review process.</b>
Page 126	Brook	Sussex Wildlife Trust		Other Policy 31 of the HDPF	If Horsham District Council consider the suggestions relating to the proposed rural policies unsuitable, it is encouraged to consider the incorporation of wording regarding up to date ecological surveys into the current Horsham District Planning Framework Policy 31 when reviewed.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
	134	Swale	Dominic Lawson Bespoke Planning	Our Place	Other Policy 4 of HDPF	Appropriate for policy to ensure that all existing settlements benefit from managed growth. However, retention of existing boundaries is not a sustainable policy given the scale of growth that is required over the next plan period.  Remove current restriction in Policy 4 regarding retaining existing defensible boundaries / settlement boundaries. Particularly where a site beyond a settlement boundary is sustainable, available and suitable for development (subject to provision of appropriate infrastructure and impact on landscape).	Object

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134	Swale	Dominic Lawson Bespoke Planning	Our Place	Other Policy 7 of HDPF	Policy 7, particularly expansion of higher education facilities and R&D and employment training.	Support	Support welcomed and noted. <b>No action required.</b>
144	Giacomelli	Natural England		Other SACs Policy	Request the inclusion of a policy protecting land functionally linked to the Ebernoe Common and The Mens Special Areas of Conservation.	Object (Omission)	Comments noted. The following action will be undertaken: <b>a) The information provided in this response will be reviewed and consideration given to the inclusion of a policy relating to Special Areas of Conservation. This will be informed by the HRA process which will accompany the local plan review.</b>
32	Jones	Savills	Thames Water	Other	Recommend the new Local Plan include the following policy/supportive text: PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT “Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.” “The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to	Object (Omission)	Comments noted and the following action will be undertaken: <b>a) The information provided in this response will be reviewed and consideration will be given to the inclusion of a policy and/or text regarding new water/wastewater infrastructure and surface water drainage as part of the next stages of the local plan review process.</b>

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Page 128					<p>assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</p>		
	136	Noble	West Sussex Local Access Forum	Public rights of way (PROW) 4.17	In para 4.17, the Forum welcomes Proposed policy c) “the development does not result in significant increase in activity including traffic movements on narrow and rural roads.”	Support	Support welcomed and noted. <b>No action required.</b>
	136	Noble	West Sussex Local Access Forum	PROW	WSLAF Members are strongly of the view that public rights of way (PROW) and the greater access network should be mentioned in the policies set out in the review.	Observation	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
	136	Noble	West Sussex Local Access Forum	Rural Economic Development 4.21	In para 4.21, the Forum supports the amendments as suggested under Rural Economic Development.	Support	Support welcomed. <b>No action required.</b>

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135	Evans	Gladman Developments		Rural Economic Development 4.20 and 4.21	Gladman support the Council's aspirations for rural economic development set out in paragraphs 4.20 and 4.21. It will be important that moving forward when the next phases of the Local Plan Review are produced that this is not lost. It is vital for rural economic development and growth that development, both residential and commercial, are sufficiently planned for.	Support	Support welcomed and comments noted. <b>No action required.</b>
109	Fox	Quod	Mayfield Market Towns Limited	Rural Economic Development Abbeylands Farm	Abbeylands Farm, Wineham Lane, Wineham BN5 9AQ: this site extends to 0.2 hectares and is currently in use for some commercial uses, and opportunity exists to intensify these uses together with bringing forward further commercial development, which could include tourism and service facilities. This site should be considered for allocation in the Local Plan for these uses.	Object (Omission)	The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.
109	Fox	Quod	Mayfield Market Towns Limited	Rural Economic Development Morley Farm	Morley Farm, Wheatsheaf Road, Henfield BN5 9BB: This site extends to approximately 1 hectare and is currently in use for light industrial purposes. There is an opportunity for additional employment and other uses	Object (Omission)	The suitability of this site will initially be considered through the Council's SHELAA process, and sites which are considered to have potential for development will be considered for inclusion in the Local Plan.

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109	Fox	Quod	Mayfield Market Towns Limited	Rural Economic Development New Policy	<p>A specific new policy is required in relation to rural allocations. Suggested wording for this new policy is set out below.</p> <p>Existing employment/mixed use sites in rural areas defined on the policy map will be safeguarded for employment-generating uses and mixed use development during the plan period. The expansion of the allocated rural sites will be supported to diversify the agricultural and other land based rural businesses provided that:</p> <p>a) the proposal is appropriate in scale, reflecting the character of the existing commercial uses; and</p> <p>b) the development does not result in a substantial increase in activity including traffic movements; and</p> <p>c) the development will not adversely impact on the landscape character and local amenity.</p> <p>Uses that contribute to area's needs will be encouraged on existing rural allocations. Within such allocations, the range of uses that could be incorporated could include restaurants linked to local agriculture; standby locations for emerging services; leisure uses; and small self-employment units. . In addition, where residential development would improve quality and reduce traffic then such development will be supported as part of mixed use development to both assist housing and employment and supply.</p>	Support with modifications	This suggestion is noted. The following action will be undertaken: <b>It will be considered as to whether a new policy in relation to rural allocations is required.</b>

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108	Griffin	Rural Planning Group	Knepp Castle Estate	Rural Economic Development Paragraph 4.21	Supports Rural Economic Development Policy. It is a key policy that will ensure the natural environment is protected, appropriate rural enterprises and opportunities can be pursued to support rural economy.	Support	Support welcomed and noted. <b>No action required.</b>
109	Fox	Quod	Mayfield Market Towns Limited	Rural Economic Development Policy 10	There is general support for the aims of this policy area. We propose that the amended wording to Policy 10 of the Horsham District Planning Framework outlined in the Employment, Tourism & Sustainable Rural Development consultation document should be further revised as follows (additional text in brackets <>): Outside built up areas or secondary settlements, development which maintains the quality and character of the areas whilst sustaining its varied and productive social and economic activity will be supported in principle. <b>&lt;Such development in the first instance will be directed to the defined rural employment/mixed use allocations and&gt;</b> should be appropriate to the countryside location and must contribute to the diverse and sustainable farming enterprises within the district or, in the case of other countryside-based enterprises and activities, contribute to the wider rural economy and/or promote recreation in, and the enjoyment of the countryside	Support with modifications	This suggestion is noted. <b>It will be considered as to whether additional allocations in rural areas are required.</b>

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134	Swale	Dominic Lawson Bespoke Planning	Our Place	Rural Economic Development Policy 10 of HDPPF	<p>We fully support encouraging sustainable rural economic development however rural economies are not just about farming and land-based activities.</p> <p>In rural areas many small and medium enterprises are home-based. The Local Plan, para 5.16, supports the growth of these businesses “in the vicinity of their home”. This means allocating employment space within access of existing settlements.</p> <p>A more ambitious approach to rural economic development will be needed if the Council’s intentions are to be met. Expanding secondary settlements to provide co-located homes and jobs and identifying new mixed use developments to encourage higher paid local employment will help reduce out-commuting, make homes more affordable for young families and reduce car journeys.</p>	Object	Comments noted. The following actions will be undertaken: <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
143	Brook	Sussex Wildlife Trust		Rural Economic Development Rural Economic Development Policy	The proposed Rural Economic Development Policy refers to enhancing biodiversity. However, it may also benefit from including wording which stipulates the need for applications to be accompanied by up to date ecological surveys. If this is considered unsuitable the Council is encourage to include wording regarding up to date ecological surveys within Policy 31 when it is reviewed.	Object	Comments noted. The following action will be undertaken: <b>when reviewing the Rural Economic Development policy regard will be given to the inclusion of a requirement for up to date ecological surveys</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
133	Hussey			Rural Economic Development sec 4.23	The revised policy is to include derelict buildings but you have applied a condition that no substantial reconstruction is to be made. Can I suggest that this condition is removed or changed so that buildings that are in a sorry state of repair can be included in your revised policy which may mean that they do require extensive modernisations?	Support with Modifications	Support welcomed and comments noted. The following action will be undertaken; <b>the inclusion of derelict rural buildings under this policy will be considered through the next stage of the local plan review.</b>
Page 133	Jubert	British Horse Society		Rural Economic Development	Page 65 Rural Economic Development: The para 'Any proposal must demonstrate they will not adversely affect the character, appearance or visual amenities and the intrinsic character and beauty of the countryside of the wider area' - is insufficient in content. This para does not sufficiently address the effects of rural development or conversions on the USE of Public Rights of Way. This would be in terms of increased activity on sites adjacent to PRow or containing PRow, changes to surfaces of PRow when being used as access roads to developments, temporary closures while site work is carried out and increased vehicle movements on rural roads that serve the PRow network. All of these effect the use of the path whether on foot, cycle or on horse, and should be considered in addition to the visual context.	Object	Comments noted and the following action will be undertaken: <b>Referring to the effect of rural development or barn conversions on Public Rights of Way under the revised Rural Economic Development Policy will be considered through the next stage of the local plan review.</b>

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Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
60	Hall	Nuthurst Parish Council		Rural Economic Development	Support the policy regarding 'rural economic development'	Support	Support welcomed and noted. <b>No action required.</b>
126	Hammond	Savills	Hall & Woodhouse	Rural Economic Development	It would be helpful to add clarity that the term Sustainable Rural Economic Development includes specific reference to new and existing tourist and leisure initiatives which may require a more isolated location as an alternative to large scale tourist attractions within established communities.	Support with Modifications	Support welcomed and comments noted. The following actions will be undertaken: <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
82	Roxby	Steyning Parish Council		Rural Workers Accommodation 4.19	The Council's fear that this policy can be used to build large homes in the countryside and then only a short time later a request is received to remove the condition and so providing a 'get around' to the normal regulations. The Council would like to see a restriction on the size and type of rural workers' accommodation allowed so that buildings are of a scale appropriate to the need and a minimum time period before permission can be sought to remove the condition.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
137	Fielding			Rural Workers Accommodation HDPF Policy 20	<p>Horsham District Planning Framework Policy 20 should be amended because it precludes any new or founding business meeting its needs if they are of a rural nature. It should also be amended and expanded to reflect changes in technology and known changes to employment types in rural settings and remove the fixation on agricultural needs for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is not just established businesses that may need new or additional accommodation (eg new Vineyards, campsites).</li> <li>• Sustainable rural in nature businesses, such as vineyards and campsites, may have greater carbon footprint because suitable staff may have no homes nearby (thus increasing the drive to work). Agricultural processes are now largely industrialised and mechanised employing fewer workers, conversely tourism and other smaller businesses often have larger employment needs than agriculture.</li> <li>• The expansion of 'e' commerce means many jobs and businesses no longer need to be in the centre of a town. Warehouses and distribution may have more employees than a public house.</li> </ul>	Object	<p>Comments noted and the following actions will be undertaken: <b>a) Policy 20 will be reviewed to assess whether further reference should be made to (i) new/emerging businesses (ii) the needs of 'rural workers' to include non-agricultural/forestry-based workers e.g. those working in tourism</b></p>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
148	Fielding			Rural Workers Accommodation HDPF Policy 20	<p>Horsham District Planning Framework Policy 20 should be amended because it precludes any new or founding business meeting its needs if they are of a rural nature. It should also be amended and expanded to reflect changes in technology and known changes to employment types in rural settings and remove the fixation on agricultural needs for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is not just established businesses that may need new or additional accommodation (e.g. new Vineyards, campsites).</li> <li>• Sustainable rural in nature businesses, such as vineyards and campsites, may have greater carbon footprint because suitable staff may have no homes nearby (thus increasing the drive to work). Agricultural processes are now largely industrialised and mechanised employing fewer workers, conversely tourism and other smaller businesses often have larger employment needs than agriculture.</li> <li>• The expansion of 'e' commerce means many jobs and businesses no longer need to be in the centre of a town. Warehouses and distribution may have more employees than a public house.</li> </ul>	Object	<p>Comments noted and the following actions will be undertaken: <b>a) Policy 20 will be reviewed to assess whether further reference should be made to (i) new/emerging businesses (ii) the needs of 'rural workers' to include non-agricultural/forestry-based workers e.g. those working in tourism</b></p>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
50	Burroughs	Slinfold Parish Council		Rural Workers Accommodation Para 4.19	Horsham District Council will need to advise Parish Councils as to how it proposes evidencing that any proposed new housing outside Built Up Area Boundary is 'for rural workers'. Slinfold Parish Council would like to be sure that Horsham District Council policies, and any changes to them, and Horsham District Council enforcement action will prevent unauthorised inhabitation, in particular within Roman Woods.	Object	Comments noted. <b>The enforcement process is not a matter for consideration as part of the local plan review and concerns can be reported to the Council's enforcement team at any time.</b>
143	Brook	Sussex Wildlife Trust		Rural Workers Accommodation Rural Workers Accommodation Policy	Given the rural isolated nature of potential developments it is essential that the ecological context of the site is considered prior to determination in line with Section 165 of National Planning Policy Framework. Therefore, suggest an additional bullet point to the proposed Rural Workers Accommodation policy: <i>c) up to date ecological surveys are submitted to demonstrate the ecological value of the site and surround areas.</i> <i>If this is considered unsuitable the Council is encourage to include wording regarding up to date ecological surveys within Policy 31 when it is reviewed.</i>	Object	Comments noted. The following action will be undertaken: <b>when reviewing the Rural Workers Accommodation policy regard will be given to the suggested additional criterion taking account of the presumption against repeating other planning policies set out elsewhere in a plan.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
59	Tester	High Weald AONB		Rural Workers Accommodation Section 4, Para 4.19	Housing for rural workers is key to ensuring that the countryside in general, and the Area of Outstanding Natural Beauty in particular, can continue to be managed appropriately in a way that conserves and enhances its natural beauty. Suggest last sentence of the proposed addition to Policy 19 be amended as follows: "Where applications are received to remove occupancy conditions associated with rural workers accommodation, evidence will be required to demonstrate why the condition is no longer required <b>that there is no need for such accommodation in the area when marketed at a realistic price for at least 12 months taking into account average incomes for land-based workers</b> ".	Object	Comments noted and the following action will be undertaken: <b>the suggestion that the Rural Workers Accommodation policy should include reference to realistic marketing of the property in the context of average incomes for land-based workers will be considered through the next stage of the local plan review.</b>
11	Bromley	West Grinstead Parish Council		Rural Workers Accommodation	Amend policy wording. Parish Council emphasise that the term "rural worker" should also include retired rural workers.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
60	Hall	Nuthurst Parish Council		Rural Workers Accommodation	Support the policy regarding 'rural workers accommodation'	Support	Support welcomed and noted. <b>No action required.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
126	Hammond	Savills	Hall & Woodhouse	Rural Workers Accommodation	Suggest that the supporting text for the Rural Worker Accommodation policy be changed to include a definition of rural workers that emphasises business sectors other than agriculture and forestry such as catering and pub staff accommodation. There is a need to meet requirements of particular tourist/short stay accommodation sectors by establishing or expanding more rural, tranquil locations and ensuring that the facility has adequate on-site management and will require the provision of self-contained/staff accommodation to be provided for operational and affordability reasons.	Support with Modifications	Support welcomed and comments noted. The following actions will be undertaken: <b>Consideration will be given to defining the term 'rural worker' to include occupations outside of traditional agriculture and forestry through the next stage of the local plan review.</b>
127	Fielding			Rural Workers Accommodation/BUA B 4.18	Do not agree with the use of a Built Up Area Boundary denoting sustainability. The National Planning Policy Framework makes no reference to Built Up Area Boundaries, to ensure alignment neither should the Local Plan Review. Agree with controlled development and ensuring quality homes but rural residents should not be restricted by this criteria.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
148	Fielding			Rural Workers Accommodation/BUA B 4.18	Do not agree with the use of a Built Up Area Boundary denoting sustainability. The National Planning Policy Framework makes no reference to Built Up Area Boundaries, to ensure alignment neither should the Local Plan Review. Agree with controlled development and ensuring quality homes but rural residents should not be restricted by this criteria.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
115	Perks	Billingshurst Neighbourhood Plan Working Group		Secondary Settlement Adversane	Note proposed designation of Adversane as a 'Secondary Settlement'. The village hall and Montessori school should be recognised as contributing to community.	Support	Comments noted. <b>No action required</b>
134	Swale	Dominic Lawson Bespoke Planning	Our Place	Secondary Settlement Adversane	<p>We fully agree with the need to look again at the currently unclassified settlements and identify those that can accept additional development.</p> <p>We fully support Adversane as a secondary settlement in order to provide additional homes, albeit on a small scale, given that Land at Brinsbury College is an excellent site for further commercial use so Adversane will support the provision of sustainable development in this location. It makes sense given its proximity to an emerging employment and training hub at the Brinsbury campus. The most sustainable solution to providing new homes for people is to build them close to good employment opportunities.</p> <p>Given our approach to development in this location, we would widen the proposed settlement boundary (see Appendix 5) to allow a further expansion of Adversane to the south. This would allow the development of additional new homes to support the proposed increase in employment space on Land at Brinsbury College.</p>	Support with Modifications	Support welcomed and comments noted. The following action will be undertaken: <b>Review proposed Secondary Settlement boundary of Adversane taking into consideration the comments regarding expanding it to the south.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
82	Roxby	Steyning Parish Council		Secondary Settlement Ashurst	Parish fully supports creating 'Secondary Settlement' designations. It will enable limited development in communities that include a hub of basic community facilities. Supports Local Plan Review recommendation to designate Ashurst as Secondary Settlement and to keep Wiston uncategorized.	Support	Support welcomed and comments noted. <b>No action required.</b>
137	Fielding			Secondary Settlement Ashurst	Ashurst should not be a secondary settlement because it has no employment, is unsustainably located, has no paved access to other settlements and has only 1 bus service a week.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Ashurst</b>
148	Fielding			Secondary Settlement Ashurst	Ashurst should not be a secondary settlement because it has no employment, is unsustainably located, has no paved access to other settlements and has only 1 bus service a week.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Ashurst</b>
84	Ward			Secondary Settlement Blackstone	Support proposed Secondary Settlement designation of Blackstone. However, request a boundary amendment, extended a further 25 metres southwards. This would utilise land, enhance neighbourhood with well-designed building and assist to alleviate housing shortage.	Support with modifications	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement boundary of Blackstone</b>
86	Bannister	Woodmancote Parish Council		Secondary Settlement Blackstone	Object to proposed designation of Blackstone as a Secondary Settlement. The hamlet is 4.2km from Henfield and approx 1.6km from nearest bus stop. It has no facilities and there	Object	Comments noted. <b>The information provided in this response will be taken into account</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
					is no explanation as to how proposed classification will benefit residents		<b>when the settlement classification of Blackstone is reviewed.</b>
137	Fielding			Secondary Settlement Blackstone	Blackstone should not be a secondary settlement because it has very limited employment, is unsustainably located since it has no bus service is remote from other settlements (approx. 4.3km to Henfield centre) and wholly reliant on the car	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Blackstone</b>
Page 142	Fielding			Secondary Settlement Blackstone	Blackstone should not be a secondary settlement because it has very limited employment, is unsustainably located since it has no bus service is remote from other settlements (approx. 4.3km to Henfield centre) and wholly reliant on the car	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Blackstone</b>
50	Burroughs	Slinfold Parish Council		Secondary Settlement Clemsfold and Rowhook	Agrees that Clemsfold and Rowhook should not be designated as Secondary Settlements	Support	Support welcomed and comments noted. <b>No action required.</b>
66	Clayden	Colgate Parish Council		Secondary Settlement Colgate	Object to secondary settlement classification for Colgate. Colgate cannot sustain further development as there is no shop nor a regular bus service just a village hall and church. Colgate village is located within an Area of Outstanding Natural Beauty.	Object	Comments noted. <b>The information provided in this response will be taken into account when the settlement classification of Colgate is reviewed.</b>
126	Hammond	Savills	Hall & Woodhouse	Secondary Settlement Colgate	Support proposed designation of Colgate as a secondary settlement as it is a sustainable location with a well-used public house, village hall, church and primary school. The centre of Colgate represents a walkable and well serviced neighbourhood capable of accommodating some additional development.	Support	Support welcomed and noted. <b>No action required</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
137	Fielding			Secondary Settlement Colgate	Colgate should not be designated a secondary settlement. It has no employment, remote from other settlements with a limited bus service and is located within an Area of Outstanding Natural Beauty.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Colgate</b>
148	Fielding			Secondary Settlement Colgate	Colgate should not be designated a secondary settlement. It has no employment, remote from other settlements with a limited bus service and is located within an Area of Outstanding Natural Beauty.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Colgate</b>
143	Fielding			Secondary Settlement Coolham	Coolham should not be designated a secondary settlement. It is remote in nature (6.6km to Southwater), no pavement to other settlements and has limited bus service.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Coolham</b>
148	Fielding			Secondary Settlement Coolham	Coolham should not be designated a secondary settlement. It is remote in nature (6.6km to Southwater), no pavement to other settlements and has limited bus service.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Coolham</b>
60	Hall	Nuthurst Parish Council		Secondary Settlement Copsale	Agree that Copsale should be excluded as a secondary settlement because it is considered to be countryside and not suitable for any development.	Support	Support welcomed and comments noted. <b>No action required.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
87	Bamford	Lower Beeding Parish Neighbourhood Plan Working Party		Secondary Settlement Crabtree	Support proposed 'Secondary Settlement' designation of Crabtree.	Support	Support welcomed and noted. <b>No action required</b>
137	Fielding			Secondary Settlement Crabtree	Crabtree is located within an Area of Outstanding Natural Beauty and should be protected against future development. It has employment facilities and a regular bus service so on balance support a secondary settlement designation as long as conservation area and Area of Outstanding Natural Beauty are protected.	Support with modifications	Support welcomed and noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
148	Fielding			Secondary Settlement Crabtree	Crabtree is located with an Area of Outstanding Natural Beauty and should be protected against future development. It has employment facilities and a regular bus service so on balance support a secondary settlement designation as long as conservation area and Area of Outstanding Natural Beauty are protected.	Support with modifications	Support welcomed and noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
137	Fielding			Secondary Settlement Dial Post	Dial Post should not be a secondary settlement because it is not sustainably located and dangerous, with no safe passage, to get to the employment cross the A24 a dual carriageway. This hazardous nature should be reflected in assessment of sustainability.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Dial Post</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
148	Fielding			Secondary Settlement Dial Post	Dial Post should not be a secondary settlement because it is not sustainably located and dangerous, with no safe passage, to get to the employment cross the A24 a dual carriageway. This hazardous nature should be reflected in assessment of sustainability.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Dial Post</b>
66	Clayden	Colgate Parish Council		Secondary Settlement Faygate	Object to secondary settlement classification for Faygate. Faygate has a limited bus service and reduced train service with the station under threat of closure, there is a shop but no church.	Object	Comments noted. <b>The information provided in this response will be taken into account when the settlement classification of Faygate is reviewed.</b>
148	Fielding			Secondary Settlement Faygate	Support designation of Faygate as secondary settlement. It has a train station, access to good bus service and services.	Support	Support welcomed and noted. <b>No action required</b>
148	Fielding			Secondary Settlement Faygate	Support designation of Faygate as secondary settlement. It has a train station, access to good bus service and services.	Support	Support welcomed and noted. <b>No action required</b>
94	Bannister	Rusper Parish Council		Secondary Settlement Ifield	Object to proposed designation as 'Secondary Settlement'. Ifield cannot cope with any further development without additional infrastructure and is located within flood plain.	Object	Comments noted. <b>The information provided in this response will be taken into account when the settlement classification of Ifield is reviewed.</b>

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137	Fielding			Secondary Settlement Ifield	Support designation of Ifield as secondary settlement. Good proximity to services and access to good bus service.	Support	Support welcomed and noted. <b>No action required</b>
145	Brigden	Crawley Borough Council		Secondary Settlement Ifield	Ifield does not meet 'Secondary Settlement' criteria as it does not have any of its own facilities, nor its own sense of place. It does, however, form part of the Built Up Area Boundary of Crawley so it is questioned as to whether it would be more sensible to include as part of a Built Up Area Boundary.	Object	Comments noted. As set out earlier in this response, <b>further review as to the potential for a BUAB rather than a secondary settlement in this area will be made and further discussion will be held with CBC in relation to this matter as the local plan review is progressed.</b>
148	Fielding			Secondary Settlement Ifield	Support designation of Ifield as secondary settlement. Good proximity to services and access to good bus service.	Support	Support welcomed and noted. <b>No action required</b>
78	Cutler	Bloombridge Development Partners	NW Horsham Estates Ltd	Secondary Settlement Kingsfold	Support proposed Secondary Settlement designation of Kingsfold. However, it is felt that the concept needs further work and that the boundary could be extended to provide for modest development adjoining settlement boundaries in certain situations. For example, North Kesteven (Central Lincolnshire) operates a policy that allows for growth in villages where there is local support.	Support with Modifications	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement boundary of Kingsfold</b>

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85	Brooks	Warnham Parish Council		Secondary Settlement Kingsfold	Warnham Parish Council and Kingsfold Residents Association request that Kingsfold be removed from the schedule of potential Secondary Settlements. Despite its unsustainable location potential developers will interpret the Built Up Area Boundary as Horsham District Council now regarding Kingsfold as sustainable and hence providing scope for larger scale development on the periphery of the Built Up Area Boundary which Horsham District Council may have difficulty in defending.	Object	Comments noted. <b>The information provided in this response will be taken into account when the settlement classification of Kingsfold is reviewed.</b>
Page 147	Onuh	Thakeham Homes Ltd	Thakeham Homes Ltd	Secondary Settlement Kingsfold	Support HDC approach to identify secondary settlements and the inclusion of a policy within the Local Plan Review, particularly the proposed designation of Kingsfold. Recommend that policy is carried through the review process to ensure Council is able to demonstrate a robust spatial strategy that not only ensures HDC can demonstrate five year housing land supply but also ensures that vitality and viability of rural communities are maintained. Request that proposed Secondary Settlement boundary is amended to include Land East of Dorking Road, Kingsfold (SA563). The site is unconstrained by national policy and is considered available, suitable, achievable and deliverable. (see map attached to representation)	Support with modifications	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement boundary of Kingsfold</b>
	137	Fielding		Secondary Settlement Kingsfold	Kingsfold should not be a secondary settlement due to its remote nature with no paved access to other settlements.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Kingsfold</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
148	Fielding			Secondary Settlement Kingsfold	Kingsfold should not be a secondary settlement due to its remote nature with no paved access to other settlements.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Kingsfold</b>
115	Perks	Billingshurst Neighbourhood Plan Working Group		Secondary Settlement Kingsfold, Blackstone, Monks Gate, Tower Hill, Shermanbury, Coneyhurst & Five Oaks	Lack of consistency in Horsham District Council's assessment of a 'sense of place' when considered whether or not to designate a 'Secondary Settlement'. Proposal to designate Kingsfold, Blackstone, Monks Gate, Tower Hill and Shermanbury despite their lack of meaningful employment, retail or tourist facilities seems at odds with the proposal not to designate Coneyhurst and Five Oaks. Coneyhurst has Quaker Blue Idol Meeting House which is a popular tourist attraction and a busy retail operation at Johnson's Yard and Four Seasons, plus growing employment uses at Court Farm. Five Oaks has a large car dealership, petrol station with a shop and second hand car sales operation as well as Ingfield Manor School.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
137	Fielding			Secondary Settlement Littleworth	Support designation of Littleworth as secondary settlement.	Support	Support welcomed and noted. <b>No action required</b>
148	Fielding			Secondary Settlement Littleworth	Support designation of Littleworth as secondary settlement.	Support	Support welcomed and noted. <b>No action required</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
60	Hall	Nuthurst Parish Council		Secondary Settlement Maplehurst	Maplehurst should, in future, have a clearly defined settlement boundary. The proposed settlement boundaries would offer clarity about where infill development might occur, and where it might not. The Parish Council sees secondary settlement boundaries as giving protection to more of the countryside that surrounds these settlements.	Support	Support welcomed and comments noted. <b>No action required.</b>
65	Clapham	Clapham Properties	Landowner	Secondary Settlement Maplehurst	Support proposed Secondary Settlement allocation of Maplehurst, however, request boundary amendment to include full amenity space of The Old Eight Acre, Park Lane, as shown on map attached to representation.	Support with Modifications	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement boundary of Maplehurst</b>
69	Fielding			Secondary Settlement Maplehurst	Maplehurst should not be designated a secondary settlement. Unsustainable location, remote from other settlements (6.8km from Southwater) with limited bus service. No paved access to a serviced settlement. Residents are reliant on car. It does have a public house but this alone does not make a settlement sustainable, as stated within Local Plan Review.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Maplehurst</b>
148	Fielding			Secondary Settlement Maplehurst	Maplehurst should not be designated a secondary settlement. Unsustainable location, remote from other settlements (6.8km from Southwater) with limited bus service. No paved access to a serviced settlement. Residents are reliant on car. It does have a public house but this alone does not make a settlement sustainable, as stated within Local Plan Review.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Maplehurst</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
149	Hayward			Secondary Settlement Maplehurst	Support proposed designation of Maplehurst as Secondary Settlement. However, request amend proposed boundary to include all of the curtilage of The Old Eight Acre, Park Lane and surrounding properties as well as the full curtilage of all properties on Nuthurst Road from The Old Cottage Farm to Pipers Croft. See map attached to representation.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Maplehurst</b>
Page 150	Metcalfe	Enplan	Veronica Simpson	Secondary Settlement Marehill	1) Noted that it is intended to solely relate to new residential development. Whilst there may be some logic we highlight that this may unnecessarily limit type of development that can come forward where economic activity should be welcomed and supported in the interest of vibrant and flourishing communities. 2) Do not consider criterion (a) as currently worded, is necessary as it introduces a judgement on whether the site is within an appropriate settlement. This is the purpose of a secondary settlement boundary, which LPA has already undertaken and duplicates the process. It introduces uncertainty for all and potential for challenges. Suggest that ' <i>within an otherwise built-up settlement form</i> ' be removed from criterion (a). 3) Consider criteria (b) and (c) are adequate to ensure development is limited in scale to reflect the existing scale and character of the settlement. Notwithstanding this, question whether introduction of secondary settlement boundaries is the best way to achieve desired effect. Horsham District Council should consider if a policy giving flexibility to allow appropriate development outside current	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
					boundaries should be pursued instead. Disagree with assessment of Marehill - it should be allocated as a secondary settlement		
38 Page 151	Fenn			Secondary Settlement Monks Gate	Monks Gate does not meet any of the Secondary Settlement criteria set out in section 4.16 and should remain a 'Countryside Location'. It is an isolated location with no service or facilities and no employment. Monks Gate has already been allocated two development sites in Neighbourhood Plan and should not take any more.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Monks Gate</b>
42	Wollan			Secondary Settlement Monks Gate	Monks Gate should not be classified as a Secondary Settlement as it does not meet the criteria. Nuthurst Neighbourhood Plan allocated two housing sites and hamlet is already under further pressure of development.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Monks Gate</b>
43	Armstrong			Secondary Settlement Monks Gate	Monks Gate should not be classified as a Secondary Settlement as it does not meet the criteria. Nuthurst Neighbourhood Plan allocated two housing sites and hamlet is already under further pressure of development.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Monks Gate</b>

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Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
44	Baldorino			Secondary Settlement Monks Gate	Monks Gate should not be classified as a Secondary Settlement as it does not meet the criteria. Nuthurst Neighbourhood Plan allocated two housing sites and hamlet is already under further pressure of development.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Monks Gate</b>
Page 152	Hall	Nuthurst Parish Council		Secondary Settlement Monks Gate	Monks Gate should, in future, have a clearly defined settlement boundary. Request two modifications to the positioning of the settlement boundaries at Monks Gate. First, the eastern boundary of the part of the settlement south of the A281 should be amended so that it follows the eastern boundary of the Neighbourhood Plan site. Secondly, request the exclusion of the copse on the northern boundary that is in the ownership of Bowwood on the A281 (as it is not part of the garden of Bowwood) in order to preclude coalescence of Monks Gate with Mannings Heath. (Officers Note: A plan was submitted with the representation to provide clarity)	Support with Modifications	Support welcomed and comments noted. <b>The information provided in this response will be reviewed when regard is given to Monks Gate and its boundary.</b>
87	Bamford	Lower Beeding Parish Neighbourhood Plan Working Party		Secondary Settlement Monks Gate	Support proposed 'Secondary Settlement' designation of Monks Gate which is located partially within Lower Beeding Parish.	Support	Support welcomed and noted. <b>No action required</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
117	McLeod	Monks Gate Residents Association		Secondary Settlement Monks Gate	<p>Object to Monks Gate being classified as a secondary settlement. It does not meet any of the stated criteria within Local Plan Review. On the understanding that Monks Gate residents do not want a boundary; should it be progressed the following should be taken into account</p> <p>(1) The copse at northern side of Bow Wood (on A281) should be excluded</p> <p>(2) Boundary proposed around properties of eastern part of Monks Gate - NOT in the Nuthurst Parish</p> <p>(3) Boundary to west of Great Ventors farm (and eastern of the existing site) is too close to the farm, should follow the site sizing in the Neighbourhood Plan. See attached photo &amp; map</p> <p>(4) The 'Pond Area' designated in Neighbourhood Plan as Green Space, should be noted by Horsham District Council as a protected area</p>	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
123	Metcalfe	Enplan	Owner of Great Ventors	Secondary Settlement Monks Gate	<p>Secondary settlements will assist in establishing where limited development may be appropriate outside current Built Up Area Boundaries. Policy currently limits development to residential. It is considered that the bar for designation has been set too high with too few settlements allocated. Support Monks Gate being allocated as secondary settlement, however, request that the boundary is amended as shown on attached plan.</p>	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
137	Fielding			Secondary Settlement Monks Gate	<p>(Officers note: The respondent assumes secondary settlements will be given a built up area boundary so the following seeks to reflect this). To classify Monks Gate as a secondary settlement would be a positive step however it should be given a built up area boundary (BUAB) and the eastern boundary should be extended to the East with the option for sustainable development adjoining the boundary for the following reasons:</p> <ul style="list-style-type: none"> <li>• To enable the settlement to prosper and thrive.</li> <li>• It is highly sustainable due to the easy sustainable access to numerous services and employment opportunities within 2km of settlement (including pubs, restaurants, hotels, leisure facilities etc and many within paved walking distance as defined in Manual for Streets), regular bus service 7 days a week giving access to rail network and airport (details provided re nos. 1, 4, 17, 89, 633, 634, 74B), wide range of sustainable transport modes, primary school with capacity, good bus service to secondary schools and wider transport network to further education/apprenticeships and other professional learning. (response included a map with a list of approximately 140 services/businesses/facilities)</li> <li>• The SHELAA (SA303 and SA328) and Nuthurst Neighbourhood Development Plan (NDP) acknowledges Monks Gate is sustainable. The latter has allocated housing within the settlement and includes infrastructure Project such as bus improvements and cycle track to Horsham.</li> </ul>	Support with modifications	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
Page 155					<p>(HDPF allocations supported but in view of the BUAB review process it is queried if Monks Gate will have a BUAB to reflect the NDP allocations.)</p> <ul style="list-style-type: none"> <li>• The Nuthurst NDP fails to identify and support smaller scale employment growth leaving a void re developing and growing employment opportunities, growth of tourism and supporting the needs of visitors in the area.</li> <li>• Lower Beeding Neighbourhood Development Plan is still in development.</li> <li>• It has a clear sense of place with speed limit and village gates.</li> <li>• It does not lie within the AONB.</li> <li>• The identification of secondary settlements desk-top study fails to give account to the Governments progressive approach to it preference for electronic access to services such as the NHS service to post prescriptions, West Sussex's 'e' library and the 'e' learning now accessible from home or hotels with conference facilities.</li> <li>• Internet shopping and delivery service should be taken into account, these help address day to day needs.</li> <li>• On the eastern edge is a small light industrial/employment site which would benefit from expansion or additional development to mirror that on the west of the settlement. An eastern expansion would also support Cisswood Hotel and Racing Yard and a number of other employment and business ventures. It would not encroach on other settlements, historic parkland, AONB, listed buildings or other sites of national designation.</li> </ul>		

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
Page 156					<p>The increased boundary would support the District by taking much needed development and support businesses/tourism in a sustainable and controlled manner.</p> <ul style="list-style-type: none"> <li>• The presence of one listed building should not preclude development within or around Monks Gate on suitable sites and designed to enhance the settlement.</li> </ul>		
	Fielding			Secondary Settlement Monks Gate	<p>(Officers note: The respondent assumes secondary settlements will be given a built up area boundary so the following seeks to reflect this). To classify Monks Gate as a secondary settlement would be a positive step however it should be given a built up area boundary (BUAB) and the eastern boundary should be extended to the East with the option for sustainable development adjoining the boundary for the following reasons:</p> <ul style="list-style-type: none"> <li>• To enable the settlement to prosper and thrive.</li> <li>• It is highly sustainable due to the easy sustainable access to numerous services and employment opportunities within 2km of settlement (including pubs, restaurants, hotels, leisure facilities etc and many within paved walking distance as defined in Manual for Streets), regular bus service 7 days a week giving access to rail network and airport (details provided re nos. 1, 4, 17, 89, 633, 634, 74B), wide range of sustainable transport modes, primary school with capacity, good bus service to secondary schools and wider transport</li> </ul>	Support with modifications	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
Page 157					<p>network to further education/apprenticeships and other professional learning. (response included a map with a list of approximately 140 services/businesses/facilities)</p> <ul style="list-style-type: none"> <li>• The SHELAA (SA303 and SA328) and Nuthurst Neighbourhood Development Plan (NDP) acknowledges Monks Gate is sustainable. The latter has allocated housing within the settlement and includes infrastructure Project such as bus improvements and cycle track to Horsham. (HDPF allocations supported but in view of the BUAB review process it is queried if Monks Gate will have a BUAB to reflect the NDP allocations.)</li> <li>• The Nuthurst NDP fails to identify and support smaller scale employment growth leaving a void re developing and growing employment opportunities, growth of tourism and supporting the needs of visitors in the area.</li> <li>• Lower Beeding Neighbourhood Development Plan is still in development.</li> <li>• It has a clear sense of place with speed limit and village gates.</li> <li>• It does not lie within the AONB.</li> <li>• The identification of secondary settlements desk-top study fails to give account to the Government's progressive approach to its preference for electronic access to services such as the NHS service to post prescriptions, West Sussex's 'e' library and the 'e' learning now accessible from home or hotels with conference facilities.</li> <li>• Internet shopping and delivery service should be taken into account, these help address day</li> </ul>		

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
Page 158					<p>to day needs.</p> <ul style="list-style-type: none"> <li>• On the eastern edge is a small light industrial/employment site which would benefit from expansion or additional development to mirror that on the west of the settlement. An eastern expansion would also support Cisswood Hotel and Racing Yard and a number of other employment and business ventures. It would not encroach on other settlements, historic parkland, AONB, listed buildings or other sites of national designation. The increased boundary would support the District by taking much needed development and support businesses/tourism in a sustainable and controlled manner.</li> <li>• The presence of one listed building should not preclude development within or around Monks Gate on suitable sites and designed to enhance the settlement.</li> </ul>		
	137	Fielding		Secondary Settlement Nutbourne	Support designation of Nutbourne as secondary settlement.	Support	Support welcomed and noted. <b>No action required</b>
	148	Fielding		Secondary Settlement Nutbourne	Support designation of Nutbourne as secondary settlement.	Support	Support welcomed and noted. <b>No action required</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
60	Hall	Nuthurst Parish Council		Secondary Settlement Nuthurst	Nuthurst should, in future, have a clearly defined settlement boundary. The proposed settlement boundaries would offer clarity about where infill development might occur, and where it might not. The Parish Council sees secondary settlement boundaries as giving protection to more of the countryside that surrounds these settlements.	Support	Support welcomed and comments noted. <b>No action required.</b>
129	Cowley			Secondary Settlement Nuthurst	Object to proposed 'secondary settlement' designation of Nuthurst. Concerned that criteria used in Local Plan Review has been misapplied. It is a relatively isolated location with limited services and facilities and bus service.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Nuthurst</b>
151	Fielding			Secondary Settlement Nuthurst	The settlement of Nuthurst should not be designated as a secondary settlement even though it has a public house, school and church because it is unsustainably located and has only 1 bus a week and no paved access to more serviced settlements. The plant nursery no longer exists so employment is limited and there is a reliance on the car.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Nuthurst</b>
148	Fielding			Secondary Settlement Nuthurst	The settlement of Nuthurst should not be designated as a secondary settlement even though it has a public house, school and church because it is unsustainably located and has only 1 bus a week and no paved access to more serviced settlements. The plant nursery no longer exists so employment is limited and there is a reliance on the car.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Nuthurst</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
51	Smith			Secondary Settlement Page 61, Table 7 Tower Hill, Appendix 3	Support proposed designation of Tower Hill as Secondary Settlement. However, amend boundary to include the full curtilage of The Hermitage. Tower Hill is a sustainable location due to short walk to Horsham Town Centre and frequent bus service.	Support with Modifications	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement boundary of Tower Hill</b>
137	Fielding			Secondary Settlement Para 4.17/Secondary Settlement Designation - Assessment of unclassified settlements	In general support but some revision in the assessment of settlements is required regarding their sustainability and suitability to be classified as a secondary settlement and they should be given a built up area boundary (officers note this is based on other comments indicating support for Monks Gate as a secondary settlement with an assumption it will be given a built up area boundary but considered overly restrictive to the east). The assessments in Table 7 should be amended to reflect the following (bus services also detailed against each settlement taken from Traveline South and East): <ul style="list-style-type: none"> <li>• Adversane - Access to Brinsbury College is on the road with no paved access. Pulborough is more than 5km from village centre. The settlement boundary extends to the railway line next to scrap/recycling plant which are not suitable neighbours to new houses and there are regulations setting out required gaps to railway lines and environmental issues with scrap yards. If Pulborough is to be considered reasonably close then a similar 5km distance should be mirrored as reasonable for all settlements.</li> <li>• Ashurst – should not be a secondary settlement.</li> </ul>	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
Page 161					<ul style="list-style-type: none"> <li>• Blackstone – It is 4.3km from Henfield village centre not 2.5km as detailed – the access used by HDC is a track/green lane not an adopted highway. It should not be a secondary settlement.</li> <li>• Coolgate - should not be a secondary settlement</li> <li>• Coolham – There is no bus to Southwater. It should not be a secondary settlement</li> <li>• Crabtree – the access to Cowfold is not paved. It is within the AONB thus has a protected environmental status and Conservation Status so should be offered protection against development. It has employment and regular bus service. On balance could be a secondary settlement subject to protection of AONB and Conservation Area and the upholding of the High Weald AONB Management Plan.</li> <li>• Dial Post - should not be a secondary settlement access across the A24 to the employment is dangerous and this hazardous nature should be reflected in assessment of sustainability.</li> <li>• Faygate – should be a secondary settlement. It has services, train station and good access to bus service</li> <li>• Ifield – there is no evidence of local business/employment in Ifield. It should be a secondary settlement because it has good proximity to services and access to a good bus service.</li> <li>• Kingsfold – should not be a secondary settlement because it is remote and no paved access to other settlements.</li> </ul>		

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Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
Page 162					<ul style="list-style-type: none"> <li>• Littleworth - should be a secondary settlement.</li> <li>• Maplehurst – should not be a secondary settlement</li> <li>• Monks Gate – the parish should be corrected to read Nuthurst and Lower Beeding. This should be corrected to reflect that there is local business/employment in Monks Gate. The section titled ‘Proximity to services in other settlement’ should be corrected to read: Approx 1.2km to Mannings Heath (not the 2.1km detailed); Approx 4.4km to Horsham town centre (not the 7.5km detailed); Approx 1.8km to Lower Beeding. Access to these settlements and Crabtree are paved (these distances are calculated using the road route on Magic Map). It should be a secondary settlement with a built up area boundary. Assessment should acknowledge the presence of Cisswood Hotel (Crabtree acknowledges South Lodge Hotel) and Cisswood Racing Stables which employs skilled and unskilled people. It should also be corrected in that there is no reliance on the car for Monks Gate due to the range of sustainable transport modes to a range of services/jobs etc</li> <li>• Nutbourne – should be a secondary settlement</li> <li>• Nuthurst – the plant nursery has been closed for several years so does not exist as a local business/employment. It should not be a secondary settlement because has limited employment, it is unsustainably located and there is a reliance on the car due to limited bus service and no paved access serviced settlements.</li> </ul>		

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
					<ul style="list-style-type: none"> <li>• Shermanbury – should be a secondary settlement</li> <li>• Shipley – should not be a secondary settlement. It is not sustainably located and has no indicated employment.</li> <li>• Tower Hill – should be a secondary settlement</li> </ul>		
148	Fielding			Secondary Settlement Para 4.17/Secondary Settlement Designation - Assessment of unclassified settlements	<p>In general support but some revision in the assessment of settlements is required regarding their sustainability and suitability to be classified as a secondary settlement and they should be given a built up area boundary (officers note this is based on other comments indicating support for Monks Gate as a secondary settlement with an assumption it will be given a built up area boundary but considered overly restrictive to the east). The assessments in Table 7 should be amended to reflect the following (bus services also detailed against each settlement taken from Traveline South and East):</p> <ul style="list-style-type: none"> <li>• Adversane - Access to Brinsbury College is on the road with no paved access. Pulborough is more than 5km from village centre. The settlement boundary extends to the railway line next to scrap/recycling plant which are not suitable neighbours to new houses and there are regulations setting out required gaps to railway lines and environmental issues with scrap yards. If Pulborough is to be considered reasonably close then a similar 5km distance should be mirrored as reasonable for all settlements.</li> <li>• Ashurst – should not be a secondary settlement.</li> </ul>	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
Page 164					<ul style="list-style-type: none"> <li>• Blackstone – It is 4.3km from Henfield village centre not 2.5km as detailed – the access used by HDC is a track/green lane not an adopted highway. It should not be a secondary settlement.</li> <li>• Colgate - should not be a secondary settlement</li> <li>• Coolham – There is no bus to Southwater. It should not be a secondary settlement</li> <li>• Crabtree – the access to Cowfold is not paved. It is within the AONB thus has a protected environmental status and Conservation Status so should be offered protection against development. It has employment and regular bus service. On balance could be a secondary settlement subject to protection of AONB and Conservation Area and the upholding of the High Weald AONB Management Plan.</li> <li>• Dial Post - should not be a secondary settlement access across the A24 to the employment is dangerous and this hazardous nature should be reflected in assessment of sustainability.</li> <li>• Faygate – should be a secondary settlement. It has services, train station and good access to bus service</li> <li>• Ifield – there is no evidence of local business/employment in Ifield. It should be a secondary settlement because it has good proximity to services and access to a good bus service.</li> <li>• Kingsfold – should not be a secondary settlement because it is remote and no paved access to other settlements.</li> </ul>		

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
Page 165					<ul style="list-style-type: none"> <li>• Littleworth - should be a secondary settlement.</li> <li>• Maplehurst – should not be a secondary settlement</li> <li>• Monks Gate – the parish should be corrected to read Nuthurst and Lower Beeding. This should be corrected to reflect that there is local business/employment in Monks Gate. The section titled ‘Proximity to services in other settlement’ should be corrected to read: Approx 1.2km to Mannings Heath (not the 2.1km detailed); Approx 4.4km to Horsham town centre (not the 7.5km detailed); Approx 1.8km to Lower Beeding. Access to these settlements and Crabtree are paved (these distances are calculated using the road route on Magic Map). It should be a secondary settlement with a built up area boundary. Assessment should acknowledge the presence of Cisswood Hotel (Crabtree acknowledges South Lodge Hotel) and Cisswood Racing Stables which employs skilled and unskilled people. It should also be corrected in that there is no reliance on the car for Monks Gate due to the range of sustainable transport modes to a range of services/jobs etc</li> <li>• Nutbourne – should be a secondary settlement</li> <li>• Nuthurst – the plant nursery has been closed for several years so does not exist as a local business/employment. It should not be a secondary settlement because has limited employment, it is unsustainably located and there is a reliance on the car due to limited bus service and no paved access serviced settlements.</li> </ul>		

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
					<ul style="list-style-type: none"> <li>• Shermanbury – should be a secondary settlement</li> <li>• Shipley – should not be a secondary settlement. It is not sustainably located and has no indicated employment.</li> <li>• Tower Hill – should be a secondary settlement</li> </ul>		
137	Fielding			Secondary Settlement Para 4.17/Secondary Settlement Policy	Object to this policy for the following reasons: <ul style="list-style-type: none"> <li>• Consideration should be given to include sustainable sites where they adjoin a settlement edge to enable organic and sustainable development of settlements.</li> <li>• Restricting just to infill would choke and suffocate settlements that would benefit from further controlled development.</li> </ul>	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
138	Fielding			Secondary Settlement Para 4.17/Secondary Settlement Policy	Object to this policy for the following reasons: <ul style="list-style-type: none"> <li>• Consideration should be given to include sustainable sites where they adjoin a settlement edge to enable organic and sustainable development of settlements.</li> <li>• Restricting just to infill would choke and suffocate settlements that would benefit from further controlled development.</li> </ul>	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
60	Hall	Nuthurst Parish Council		Secondary Settlement Proposed Policy - Secondary Settlement	Support proposed policy on Secondary Settlements.	Support	Support welcomed and noted. <b>No action required.</b>
60	Hall	Nuthurst Parish Council		Secondary Settlement Sedgwick	Agree that Sedgwick should be excluded as a secondary settlement because it is considered to be countryside and not suitable for any development.	Support	Support welcomed and comments noted. <b>No action required.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
137	Fielding			Secondary Settlement Shermanbury	Support proposed designation of Shermanbury as a secondary settlement.	Support	Support welcomed and noted. <b>No action required</b>
148	Fielding			Secondary Settlement Shermanbury	Support proposed designation of Shermanbury as a secondary settlement.	Support	Support welcomed and noted. <b>No action required</b>
137	Fielding			Secondary Settlement Shipley	The settlement of Shipley should not be secondary settlement as it is unsustainable and in a remote location. It has limited bus service, no paved access to other settlements and no areas of employment.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Shipley</b>
137	Fielding			Secondary Settlement Shipley	The settlement of Shipley should not be secondary settlement as it is unsustainable and in a remote location. It has limited bus service, no paved access to other settlements and no areas of employment.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement designation of Shipley</b>
58	Rees			Secondary Settlement Tower Hill	Amend proposed Secondary Settlement boundary of Tower Hill to include the six dwellings on the west side of Two Mile Ash which form integral part of Tower Hill. See plan attached to email.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement boundary of Tower Hill</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
124	Bourke	Dowsett Mayhew	John Barron	Secondary Settlement Tower Hill	Support allocation of Tower Hill as 'Secondary Settlement'. However, request amendment to southern boundary to include land at Paddock House as it meets the assessment criteria. It has a clear relationship with and forms part of the built and existing form of Tower Hill. It forms part of the residential enclave to the north and relates to the settlement of Tower Hill rather than the rural landscape which lies beyond to the south.	Object	Comments noted and the following action will be undertaken: <b>Review proposed Secondary Settlement boundary of Tower Hill</b>
Page 168	Fielding			Secondary Settlement Tower Hill	Support proposed designation of Tower Hill.	Support	Support welcomed and noted. <b>No action required</b>
	Tobin	Southwater Parish Council		Secondary Settlement Tower Hill	Representation received in two parts; original letter followed by clarification email. Object to proposed Secondary Settlement designation of Tower Hill. Parish feel very strongly that countryside policies should be sufficient to protect green buffer zone from coalescence with Horsham. Concerns that area could have small high density development in the large gardens by way of sell off. Recommend Council refer to South Downs National Park Authority Methodology in relation to secondary boundaries.	Object	Comments noted. <b>The information provided in this response will be reviewed when considering whether Tower Hill forms a secondary or unclassified settlement.</b>

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Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
148	Fielding			Secondary Settlement Tower Hill	Support proposed designation of Tower Hill.	Support	Support welcomed and noted. <b>No action required</b>
151	Mace			Secondary Settlement Tower Hill	Object to proposed designation of Tower Hill as Secondary Settlement as it does not meet the assessment criteria. However, if proposal is taken forward then Two Mile Ash should be used as the western boundary as it is easily defensible. Council should consider the South Downs National Park Authority Methodology when permitting building in gardens of existing dwellings.	Object	Comments noted and the following actions will be undertaken: <b>a) Review proposed Secondary Settlement designation of Tower Hill: b) Additional information provided in this response will be considered through the next stage of the local plan review.</b>
108	Griffin	Rural Planning Group	Knepp Castle Estate	Secondary Settlement	We support proposed designation of Coolham and Dial Post as Secondary Settlements. However, it is felt that small scale appropriate development on the edge of the settlement should be acceptable in some cases. Infill is too restrictive particularly as the settlement criteria is based on locational and service provision. It would be more appropriate to allow sites on the edge of settlements as long as it can be shown that they would have minimal impact on surrounding landscape. An alternative approach to identifying settlements with boundaries to apply the policy in would be to implement a criteria based approach instead,	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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					removing boundaries and allowing small scale development in all settlements and hamlets provided it meets certain criteria. This would seem to be a more appropriate strategy as it would be for very small-scale development.		
170	Bourke	Dowsett Mayhew	John Barron	Secondary Settlement	<p>Given the significant number of neighbourhood plans being prepared in areas with proposed secondary settlements, it is recommended that the proposed Secondary Settlements Policy is updated to align with Horsham District Planning Framework Policy 4: Settlement Expansion, to enable Neighbourhood Plans to positively consider development which adjoins a secondary settlement.</p> <p>Request that the proposed policy is updated to include the following wording:                      "Outside of proposed secondary settlements, the expansion of secondary settlements will be supported where, the site is allocated in the Local Plan or in Neighbourhood Plan and adjoins an existing secondary settlement edge".</p>	Support with modifications	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
143	Brook	Sussex Wildlife Trust		Secondary Settlement	Proposed Secondary Settlements are not presented with environmental information in either Table 7 or Appendix 3, therefore unable to review sites in detail as currently unclear if proposed settlement boundaries are adjacent to any designated or priority habitats. Also important to consider their place in Green Infrastructure Network.	Observation	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
60	Hall	Nuthurst Parish Council		Sustainable Rural Development Chapter 4 in Issues and Options 2018	Object to the omission in Chapter 4 which relates to Sustainable Rural Development to the almost complete lack of reference to Neighbourhood Plans. The District has a number of made Neighbourhood Plans and others in preparation. The Parish Council strongly suggests that acknowledgement is given to the major contribution that Neighbourhood Plans can make to sustainable rural development.	Object	Comments noted. <b>The information provided in this response will be reviewed and regard given to a reference to the contribution that Neighbourhood Plans can make to sustainable rural development.</b>
Page 176	Evans			Sustainable Rural Development Section 4.1-4.24	A thorough and sensible set of proposals to update the regulation of useful and sustainable development in the countryside. The designation of secondary settlements is of practical value.	Support	Support welcomed and comments noted. <b>No action required.</b>
	Grant	Henfield Parish Council		Sustainable Rural Development	Support policies within Local Plan Review which seek to protect the underdeveloped nature or rural environment from inappropriate development.	Support	Support welcomed and comments noted. <b>No action required.</b>
127	Gleeson	Mole Valley District Council		Sustainable Rural Development	Mole Valley District Council supports the recognition of the need to achieve sustainable development in the more rural parts of Horsham District through reviewing the development hierarchy and the wider capacity of each settlement. Assessing development within 'unclassified' settlements will assist in recognising the potential for some limited development throughout the District that in turn will help rural communities to thrive.	Support	Support welcomed and noted. <b>No action required.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
137	Fielding			Sustainable Rural Development / BUAB Para 4.4	District and Neighbourhood Plans should reflect NPPF, para 28, so that reference is given to sustainability and no reference is given to built up area boundaries. (Officers note: in view of respondent's other comments which indicate support for a built up area boundary in Monks Gate it is unclear if this comment relates to the references in policy text only or policies map as well)	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
	Fielding			Sustainable Rural Development / BUAB Para 4.4	District and Neighbourhood Plans should reflect NPPF, para 28, so that reference is given to sustainability and no reference is given to built up area boundaries. (Officers note: in view of respondent's other comments which indicate support for a built up area boundary in Monks Gate it is unclear if this comment relates to the references in policy text only or policies map as well)	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
1	French	Gatwick Diamond Initiative		Tourism Evidence Base	It would be worthwhile bringing the research and evidence up to date by including the February 2018 Oxford Economics report on 'Gatwick Airport's Impact on the Visitor Economy', which highlights the poor performance of Horsham, for example, in overnight stays compared to neighbouring areas.	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be reviewed.</b>

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Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018  
 Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
137	Fielding			Tourism HDPF Policy 11	Horsham District Planning Framework Policy 11 is supported but should be amended to recognise the need of villages and wider Parishes outside of Horsham that form a gateway to the High Weald AONB where support should be given to grow tourism sustainably and to deliver high quality visitor accommodation.	Support with modifications	Comments noted. The following action will be undertaken: <b>a) The Tourism policy will be reviewed and consideration given to the proposals in this response.</b>
148	Fielding			Tourism HDPF Policy 11	Horsham District Planning Framework Policy 11 is supported but should be amended to recognise the need of villages and wider Parishes outside of Horsham that form a gateway to the High Weald AONB where support should be given to grow tourism sustainably and to deliver high quality visitor accommodation.	Support with modifications	Comments noted. The following action will be undertaken: <b>a) The Tourism policy will be reviewed and consideration given to the proposals in this response.</b>
134	Swale	Dominic Lawson Bespoke Planning	Our Place	Tourism Land at Toat Café, Pulborough	Support the proposal to develop rural tourism activity on Land at Toat Cafe, Pulborough. This would not only lead to the improvement of the appearance of the existing site, but would be complementary to our proposed country house hotel at Steepwood, providing further visitor attractions to support the local visitor economy.	Support	Support welcomed and comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps	
Page 174	102	Welchman	Armstrong Rigg Planning	Dunmoore	Tourism Land North of Hillands Farm	Land north of Hilland Farm could provide an appropriate site to support a hotel as part of an employment-led business scheme. The site is close enough to access and provide accommodation for National Park driven demand.	Object (Omission)	Comments noted. <b>The potential for tourism-related development will be investigated as part of the next stage of the local plan review process.</b>
		Whitehead	North Horsham Parish Council		Tourism North Horsham Parish	North Horsham Parish is not a tourist destination, but it has some unique features that are valued by residents and have the potential for attracting more people. New House Farm – is a tea room, farm shop and offers pick your own facilities in the summer. The Frog and Nightgown public house and café – is a unique experience and well-loved locally. The Motte and Bailey at Chennells Brook – Horsham District Council’s only listed Ancient Monument. It is hoped that any plans do not detrimentally affect these local treasures.	Observation	Comments noted. <b>The information provided in this response will be reviewed.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps	
Page 175	81	Grech		Sandgate Conservation Society	Tourism Policy 11	A long held local ambition has been the creation of a 'country park' on the land currently used for quarrying north of the A283 between Washington and Storrington with the existing public open spaces of Sullington Warren (National Trust) to the west and Sandgate Park (Horsham District Council) to the north-west. While the ambitions for the country park may not be for a major tourist attraction the Society considers that in addition to the significant benefits it would bring to the increasing local population it would attract day visitors to the area and would serve to encourage tourists to linger longer.	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review and the land at Sandgate pit will be considered as a possible future site.</b>
		Tanous		Heath Common Residents Association	Tourism Sandgate Country Park	Heath Common Residents Association request that in addition to the one site nominated for tourism (Toat Café/A29), Horsham District Council consider whether the Sandgate pit meets the criteria of the consultation document, and can be considered as a possible future site, to help Horsham District Council meet its objective in relation to the Tourism policy.	Object (Omission)	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review and the land at Sandgate pit will be considered as a possible future site.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
35	Read	Storrington & Sullington Parish Council		Tourism Sandgate Country Park	Request inclusion of Sandgate Country Park as an option in update to Horsham District Planning Framework Policy 11 (Tourism and Cultural Facilities) as this will: <ul style="list-style-type: none"> <li>• Provide linkages within the local area to wider areas of countryside and the SDNP</li> <li>• Provide additional areas of Greensand Heathland with additional benefit of taking some pressure off Sullington Warren SSSI, due to overuse</li> <li>• Provide more land with public access to benefit the residents of large housing developments that have been delivered or are under construction</li> <li>• Provide local recreational activities - the potential for water-based recreation using the lakes within the Country Park still exists.</li> </ul>	Object	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review and consideration given to the inclusion of Sandgate Country Park.</b>
139	Savill	Washington Parish Council		Tourism Sandgate Country Park / Policy 11	Councillors support the Sandgate Conservation Society's proposal for the formation of Sandgate Country Park requesting that it is included as an option in support of Policy 11.	Object (Omission)	Comments noted. The following action will be undertaken: <b>when reviewing Tourism regard will be given to the inclusion of an option relating to the formation of Sandgate Country Park</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018  
 Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
134	Swale	Dominic Lawson Bespoke Planning	Our Place	Tourism Steepwood Estate and Brinsbury College	<p>The Council's Hotel and Visitor Accommodation Study (2016) identified the need for a further luxury or boutique country house hotel. We propose a new country house hotel on the Steepwood Estate located close to the A29 and stations at Pulborough and Billingshurst, for access to London and all parts of the District, including the nearby South Downs National Park. The hotel could provide training and apprenticeship opportunities for students from the Chichester and Crawley campuses of Chichester College. Along with a new hotel some boutique self-catering properties could be provided. The scheme could provide trails for walkers, riders and cyclists, using the existing footpaths and bridleways, connecting into the network of public rights of way linking into the National Park to the south of Steepwood Estate.</p> <p>Allowing development on Land at Brinsbury College, complementing the existing brewery and plant nursery, provides opportunities to develop a wide range of employment-generating visitor attractions such as small businesses within the local food and drink industry, arts, crafts, horse-riding, cycling and rural manufacturing industry. Some could relate to the courses provided at Brinsbury campus helping to make it more inclusive of the community. In this context we agree with the proposals to strengthen the existing Policy 11 (Tourism and Cultural Facilities) to encourage such developments, especially in the south of the district which experiences significant National Park-driven demand.</p>	Object (Omission)	Comments noted. The following actions will be undertaken: <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
138	West	West Sussex County Council		Tourism Toat Café	The site is poor in terms of accessibility. However, the nature of the proposed use is such that this ought not to generate significant numbers of non-motorised trips, especially if the redevelopment proposal includes facilities for users. It is also a reasonable walk towards services in Pulborough, which makes trips on foot even less likely.	Support	Comments noted. The following action will be undertaken: <b>a) when reviewing the Toat Cafe proposal regard will be given to the comments on access and accessibility.</b>
Page 178	Brook	Sussex Wildlife Trust		Tourism Toat Café	We ask the council to consider the suitability of the Toat Café allocation and its scale in the context of the Green Infrastructure Network and the opportunities and constraints it poses for biodiversity.	Object	Comments noted. The following action will be undertaken: <b>a) when reviewing the Toat Cafe proposal regard will be given to the comments on Green Infrastructure and biodiversity.</b>
60	Hall	Nuthurst Parish Council		Tourism Tourism (Chapter 3 in Issues and Options 2018)	No comment in respect of Tourism (Chapter 3 in Issues and Options 2018)	No comment	No comment noted. <b>No action required.</b>
49	Day	Denne Neighbourhood Council		Tourism Visitor Economy Strategy	Visitor Economy Strategy (page 33): HDNC suggests that the Visitor Economy Strategy should also promote heritage aspects of the district; in Horsham Town this would include Heritage Trails and the Museum.	Support with Modifications	Support welcomed and comments noted. <b>The information provided in this response will be reviewed and regard given to the promotion of heritage aspects in the Visitor Economy Strategy.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
132	Partridge	Mid Sussex District Council		Tourism Visitor Economy Strategy	Request that the Visitor Economy Strategy section refers to wider partnership working with relevant organisations, such as with Tourism South East, West Sussex County Council, the Coast to Capital LEP, Gatwick Diamond, the Rural West Sussex Partnership and other local authorities. There may be opportunities for both authorities to work together on preparing a more up to date evidence base for this area of work, which would support both Local Plans.	Support with modifications	Comments noted. Horsham District Council welcomes and supports joint working and joint preparation of an appropriate evidence base. <b>The information provided in this response will be reviewed.</b>
133	Challenger	Strutt & Parker	South Downs Real Estate Ltd (Nyetimber Ltd)	Tourism West Chilmington Golf Club	The proposed changes to the tourism policy are welcomed, particularly bullet points 2 "Enabling some flexibility towards developing visitor accommodation in the countryside" and 3. "Identification of the circumstances where on-site staff accommodation for some rural visitor accommodation businesses would be acceptable." The old golf club building remains in a dilapidated state but presents an opportunity for Nyetimber Ltd to diversify its business and contribute further to the tourism economy, potentially providing overnight accommodation for visitors to the vineyard and local area. Whilst no decision has been made regarding the future of the golf club building, it is important that planning policies are in place which do not prohibit Nyetimber from finding a suitable use for the site which complements their business, whilst also being an appropriate countryside-based use which contributes to the rural economy and tourism. 24-hour security presence is required and there is becoming an urgent need for on-site staff accommodation/security lodge. Furthermore, if	Support	Support welcomed and comments noted. <b>No action required.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
					a new building were to be erected on the Golf Club site to provide visitor accommodation, on-site staff accommodation will be required in order to manage the building and look after guests effectively.		
14	Holmes	Horsham Society		Tourism	<ol style="list-style-type: none"> <li>1. Horsham Town's attractions needs to be professionally publicised</li> <li>2. Horsham Town and District need to be separately promoted</li> <li>3. The updated Tourism policy, page 35 requires more proposals relating to Horsham Town</li> <li>4. The Horsham Society should be asked for their advice with respect to promoting Horsham Town.</li> <li>5. The town's links with Shelley should be celebrated and commemorated so that the Town become a destination for people interested in the poet.</li> <li>6. The approaches to the town need to be attractive and welcoming with traffic able to flow easily.</li> </ol>	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
27	Evans			Tourism	<p>3.1 - 3.10 Encouraging proposals to assist a potential growth sector. It might be suitable to attract some wider interest with a memorial for Percy Shelley; a small garden in Horsham Park, containing a statue on a Horsham stone base?</p>	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

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Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
82	Roxby	Steyning Parish Council		Tourism	Tourism - This section focuses on rural tourism, the events cited are based in Horsham itself. The following should also be referenced: the widely acclaimed bi-annual Steyning Festival, monthly farmer's market and many regular club & society events. Steyning is a significant historic town with many impressive listed buildings. Local tourism is a key component of the local economy and should feature in the Horsham District Council Local Plan.	Observation	Comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
90	Stanley	Carter Jonas	Horsham Golf & Fitness Club	Tourism	Horsham Golf Club supports in principle the Council in undertaking a review of its Local Plan in order to address the outstanding strategic issues highlighted by the examining Inspector at the time. We further support and encourage the Council to more proactively address the leisure and tourism offer in the District, with existing policy being largely silent on new facilities coming forward.	Support with modifications	Support welcomed and comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>
108	Griffin	Rural Planning Group	Knepp Castle Estate	Tourism	Knepp Castle Estate fully supports the aims of the Horsham Visitor Economy Strategy. A key issue for tourism is rural public transport. The Council's tourism strategy and transport strategy should encourage better quality and more accessible rural public transport. New tourism development could be encouraged to highlight sustainable alternative travel options in their marketing material. There needs to be a more strategic push from the Council to improve services in general.	Support	Support welcomed and comments noted. <b>The information provided in this response will be considered through the next stage of the local plan review.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018  
 Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
126	Hammond	Savills	Hall & Woodhouse	Tourism	<p>Hall &amp; Woodhouse owns 16 public houses in the District providing around 500 full and part time jobs. It welcomes an approach that allows for new facilities to be brought into use however it should include established sites so that new forms of guest accommodation, including new build extensions as well as options to deliver serviced lodges, pods or Glamping could serve to improve the robustness and viability of the established public house (or similar) facility. Providing new visitor accommodation with in situ serviced catering and support infrastructure eg small shop, showers etc without fundamentally altering the character of land from agricultural uses. For example The Dog &amp; Duck, Kingsfold and The Blue Ship, Billingshurst could build upon the established facility which have paddocks used to date occasionally for camping/events.</p> <p>The 2nd bullet point of the draft policy where it discusses the possible locations where new build accommodation and new sites may be acceptable should be amended to include among the range of examples "Land that adjoins or is within the curtilage of established visitor, or community attractions and infrastructure, including hotels, public houses and similar establishments."</p>	Support with Modifications	Comments noted. <b>The following action will be undertaken: The wording of the Tourism policy will be reviewed taking into account the proposals in this response.</b>

Appendix 1: Horsham District Council Local Plan Review Issues and Options Consultation 2018

Summary of Responses and Proposed Next Steps

Respondent No	Surname	Organisation	Agent For:	Topic Area Site reference	Summary of Comment	Nature of comment	Next steps
138	West	West Sussex County Council		Tourism	The location of the district, in order for people to access wider tourism facilities and places of interest within and outside West Sussex, could be incorporated within this section. Recognising the importance of the wider area and the role Horsham District can play in tourism in West Sussex and beyond. The economic value of sport and sport-related activities, as highlighted in the 2013 Sport England report 'Economic value of Sport', should be considered and promoted across the district, with opportunities for more developments to increase options available for both locals and visitors.	Support with modifications	Comments noted and the following actions will be undertaken when reviewing the tourism in the Local Plan Review: <b>a) regard will be given to the inclusion of reference to the importance of the wider area and the role Horsham District can play in tourism in West Sussex and beyond. b) regard will be given to the economic value of sport and sport-related activities and the opportunities for more developments to increase options available.</b>
60	Hall	Nuthurst Parish Council		Unclassified / Secondary Settlements Residential Garden Infilling	Parish Council wish to see it made more difficult for 'infill' houses to be built in gardens of existing dwellings as can fundamentally alter visual character of lane/road, its ecology and introduce an urbanizing effect in the Parishes settlements. The NPPF does not support such development.	Object	Comments noted. <b>The information provided in this response will be reviewed and regard given to restricting infill dwellings in gardens.</b>

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## Report to Cabinet

20 September 2018

By the Leader of the Council

### KEY DECISION



**Horsham  
District  
Council**

Not Exempt

<p align="center"><b>Horsham District Deal (September 2018)– Horsham District Council and West Sussex County Council 2018-2023</b></p>
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## Executive Summary

In 2015, West Sussex County Council worked with the Boroughs and Districts of West Sussex to identify the key issues and priorities in relation to planned growth and development within their boundaries over the coming years. A “Place Plan” was produced containing demographic and socio-economic information; details of planned housing and economic growth; and planning/economic priorities. The Place Plans supported prioritisation of investment and lobbying to attempt to secure additional funding for infrastructure.

Cabinet resolved on 28 January 2016 to endorse the “Horsham Place Plan”, which included five key issues and priorities for Horsham District ( 1 - North of Horsham and West of Horsham Infrastructure; 2 - Creation and delivery of a new Town Centre Vision for Horsham; 3 - Rationalisation of the public estate in Hurst Road; 4 - Digital connectivity to support the rural economy and home-based businesses; and 5 -Redevelopment of the former Novartis site in Horsham town).

The “Horsham District Deal” is an agreement between Horsham District Council and West Sussex County Council to formalise the priorities identified in the “Horsham Place Plan” and to work together to deliver these key projects, including the provision of new homes, employment floorspace, and new infrastructure. The priority in relation to Digital Connectivity is the delivery of the Gigabit project, as agreed with District and Borough partners. To date, “District & Borough Deals” have been signed between West Sussex County Council and Crawley Borough Council, Mid Sussex District Council, Chichester District Council, Arun District Council and Adur & Worthing Councils.

## Recommendations

Cabinet is recommended to:

- i) Endorse the “Horsham District Deal”, so that it can be signed off by the Leaders of Horsham District Council and West Sussex County Council respectively.
- ii) Delegate authority to the Leader of the Council to approve minor editorial changes prior to publication.

## Reasons for Recommendations

- i) For consideration by Members – the agreement between Horsham District Council and West Sussex County Council will ensure that both Councils fully understand and support growth priorities for Horsham as identified in the Deal.
- ii) To give the Leader of the Council delegated authority to approve minor changes to the document, without the need for it to be referred back to Cabinet.

## Background Papers:

1. Draft “Horsham District Deal” (September 2018) – Horsham District Council and West Sussex County Council (2018-2023) – Appendix 1
2. “Horsham Place Plan” (January 2016)  
<https://horsham.moderngov.co.uk/documents/s1143/06dii%20Draft%20Horsham%20Place%20Plan%20v1.8%2015.01.16.pdf>

**Wards affected:** All

**Contact:** Barbara Childs, Director of Place

Mark McLaughlin, Principal Planner, Strategic Planning

## **Background Information**

### **1. Introduction and Background**

- 1.1 The “Horsham District Deal” (August 2018) seeks to formalise the work that was undertaken to produce the “Horsham Place Plan”, and endorsed by Cabinet in January 2016. It takes forward the following four key priorities/projects for Horsham District Council:
- West of Horsham and North of Horsham Infrastructure Provision
  - Horsham Town Centre- Delivery of a new Town Centre Vision
  - Hurst Road – rationalisation of the public estate
  - Former Novartis Site, Horsham Town – redevelopment of the site
- 1.2 The “Horsham District Deal”, once signed by the Leaders of Horsham District Council and West Sussex County Council, will be used to secure resources and investment to enable infrastructure priorities to be delivered. Horsham District Council will also work together with West Sussex County Council to produce joint bids for further infrastructure investment.

### **2 Relevant Council policy**

- 2.1 The Horsham District Planning Framework (HDPF) is the current Local Plan that sets out how growth and development will take place in the District in the period to 2031. A new Local Plan is being prepared. An “Issues & Options – Employment, Tourism and Sustainable Rural Development” document was published for public consultation between 6 April 2018 and 25 May 2018. A report on the responses received to this document is being taken to Cabinet on 20 September 2018. A further “Issues & Options” document, which will include housing, is scheduled for public consultation in September/October 2019.
- 2.2 Horsham Council also published an “Economic Strategy 2017-2027” in 2017. This document sets out an economic overview; an economic strategy “Vision Statement”; and a number of chapters dealing with five economic priorities: inward investment, enterprise, skills and employment, infrastructure, and promoting the District offer.

### **3 Details**

- 3.1 The “Horsham District Deal” sets out the principles of the agreement between Horsham District Council and West Sussex County Council. It also sets out details of the proposed governance framework, including an officers’ group; individual project teams and the setting up of a members’ group to oversee the implementation of the work.
- 3.2 Each of the priorities identified in paragraph 1.1 above has a background section, together with a table identifying “Key deliverables and activities”, the “Partnership Lead” and what “Subject Matter Expertise” is required.
- 3.3 For the work on Priority 1) “West of Horsham and North of Horsham infrastructure provision”, the key deliverables/activities have been identified as:

- Delivery of the remaining key elements of the West of Horsham infrastructure package, including the four major highway schemes
- West Sussex County Council and Horsham District Council working with the developers, Network Rail and other stakeholders to facilitate the delivery of new rail passenger facilities in and around new developments north of Horsham.
- West Sussex County Council and Horsham District Council working together to bring forward the required off-site highways infrastructure works, where possible ahead of schedule, and putting together a bid to enable delivery of the projects ahead of the collection of Section 106 contributions.
- Working with Liberty to ensure the works and contributions securing on-site highways works, affordable housing, health facilities, community infrastructure and employment floorspace are delivered.
- Also, Horsham District Council and West Sussex County Council working with education providers (including free school providers) to secure early provision of education infrastructure on-site.

3.4 For the work on Priority 2) “Horsham Town Centre – Delivery of a new Town Centre Vision”, the key deliverables/activities have been identified as:

- An examination of the funding opportunities available to deliver the projects identified in the “Horsham Town Centre Vision Statement.
- Developing a Programme and Investment Strategy identifying key project priorities to be delivered between 2018 and 2023. The Programme and Investment Strategy will include consideration of each of the sites included in the “Town Centre Vision” alongside the benefits of progressing:
  - a town centre public realm strategy;
  - a walking and cycling strategy;
  - a car parking strategy.

3.5 For the work on Priority 3) “Hurst Road – rationalisation of the public estate”, the key deliverables/activities have been identified as:

- Horsham District Council and West Sussex County Council to work together following initial One Public Estate funding success (total of £100,000) to develop a business case for i) HDC to lead on producing a detailed options, feasibility and viability study for Hurst Road and ii) West Sussex County Council to lead on project for a new “Combined Blue Light Centre” (relocation of fire and police station from Hurst Road to A24) from feasibility to submission of applications.
- The work will require discussions with the Ministry of Justice and Royal Mail on their relocation options from Hurst Road.

3.6 For the work on Priority 4) “Former Novartis Site, Horsham Town – redevelopment of the site”, the key deliverables/activities have been identified as:

- West Sussex County Council undertaking design work on the site and agreeing a business case before taking a decision to progress the submission of an outline planning application.
- Horsham District Council to provide pre-application advice to West Sussex County Council, on redevelopment proposals for the site.

## 4 Next Steps

- 4.1 Following Cabinet, the final version of the “Horsham District Deal” will be signed by the Leaders of Horsham District Council and West Sussex County Council. Work will then commence on setting up the governance framework to oversee future projects. Details of the agreed priorities of the District Deal will be placed on the Horsham District Council and West Sussex County Council websites.

## **5 Views of the Policy Development Advisory Group**

- 5.1 N/A

## **6. Consultation**

- 6.1 The “Horsham Place Plan” was prepared under the guidance of a group of members and officers from West Sussex County Council and Horsham District Council.

## **7 Other Courses of Action Considered but Rejected**

- 7.1 No other course of action was considered. It was decided that by signing the District Deal with West Sussex County Council, Horsham Council could clarify its existing development priorities, and seek to work with West Sussex County Council to bid for further funding where appropriate.

## **8 Resource Consequences**

- 8.1 West Sussex County Council and Horsham District Council were successful in bidding for funding from the Government’s “One Public Estate” scheme (Phase 6 (November 2017)). HDC received £60,000 and WSCC received £40,000 to develop a business case (including an appropriate phasing proposal) to progress both elements of the Hurst Road scheme. Horsham District Council has not yet received this funding.
- 8.2 Where the proposed projects involve the District Council’s investment, such as the Hurst Road redevelopment, they will be subject to separate business cases.

## **9 Legal Consequences**

- 9.1 This is an informal agreement between Horsham District Council and West Sussex County Council. The priorities identified in going forward will be subject to the usual individual legal considerations and considerations pursuant to the Town and Country Planning Act 1990 (as amended).

## **10 Risk Assessment**

10.1 It is not considered that there any risks associated with this document, other than the risks that have already been identified in the four priority projects outlined in paragraph 1.1 above.

## **11 Other Considerations**

11 Equality and Diversity

11.1 Attention is drawn to the duty under Section 149(1) of the Equality Act 2010 which provides that a public authority must, in exercise of its functions, have due regard to the need to (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation. Assessment of the equalities impacts of the priorities will be undertaken on an ongoing basis and as part of the statutory processes as the priorities come forward to deliverable project.

## **Appendix 1**

- Draft “Horsham District Deal” (September 2018) Horsham District Council and West Sussex County Council (2018-2023)

## **DRAFT**

# **Horsham District Deal – Horsham District Council and West Sussex County Council (2018-2023)**

## **Executive Summary**

This “District Deal” sets out a joint undertaking between Horsham District Council and West Sussex County Council to combine resources to deliver shared priorities, providing new homes and jobs in the District and seeking to secure new funds. The shared strategic growth priorities are based on those set out in the Horsham Place Plan.

1. West of Horsham and North of Horsham Developments - Implementation of the comprehensive infrastructure packages that support the delivery of housing and economic growth at those locations and integrate them with Horsham Town.
2. Horsham Town Centre- Creation and delivery of a new Town Centre Vision to promote and sustain Horsham town centre and to maximise investment opportunities for identified development sites in the town.
3. Hurst Road – Rationalisation of the public estate on Hurst Road- a joint approach to comprehensive redevelopment including, potentially, the Fire and Rescue Service, Ambulance and Police stations, Courts, Youth Centre and Training Centre to create opportunities for re-provision of existing services off-site and to utilise development potential to deliver an additional mix of uses including housing and employment.
4. Former Novartis Site, Horsham Town – redevelopment of the site.

## **Growth Deal Principles**

West Sussex County Council is keen to develop new and closer working relationships and partnerships with district and borough councils to create the conditions for economic growth and to maximise the funding available to deliver the growth.

The County Council is developing a series of bespoke deals with individual district and borough councils, which build on individual Place Plans.

This Growth Deal builds upon the priorities that were identified and agreed in the Horsham Place Plan (2016).

It supports the delivery of the Horsham District Planning Framework (adopted November 2015, with a Plan period ending in 2031); the Horsham District Economic

Strategy (February 2017); and the West Sussex Economic Strategy 2012-2020. In addition, the Coast to Capital Strategic Economic Growth Plan (2014) and the Gatwick Diamond Local Strategic Statement Refresh Statement (2016) also seek to promote growth within Horsham District.

The Growth Deal strengthens accountability between West Sussex County Council and Horsham District Council and identifies ways of working to improve communication, co-operation and efficiency. The two Councils have agreed to work together to deliver specific growth priorities (see Appendix A).

The Councils will agree ways of prioritising funding from all available funding streams to support the delivery of the priorities set out in the “District Deal”.

The “District Deal” focuses on delivering the priorities within the next five years (2018-2023). The councils will also liaise on other statutory processes (e.g. Planning), programmes and projects to attempt to deliver the most effective outcomes for local communities. The priorities highlighted in this document do not alter the councils’ statutory duties.

The Councils will support the delivery of the Growth Deal priorities. Appropriate officer support (e.g. a dedicated officer from West Sussex County Council) will be given to the management of the Growth Programme to ensure regular monitoring of progress on the project priorities.

### **Growth Deal Governance Framework**

The Governance Framework will ensure that the principles for the Growth Deal highlighted above are achieved. It will also ensure that the Growth Deal priorities, highlighted in the Executive Summary, are delivered.

#### Horsham Officers’ Group

A “Growth Group” will be formed to support the two Councils. It will comprise officers from Horsham District Council and West Sussex County Council. It will meet quarterly to:

- Provide strategic leadership for the Growth Programme;
- Ensure that investment is aligned to support delivering the Growth Programme;
- Monitor the growth projects to ensure progress is being made, and if needed provide remedial action to improve delivery;
- Examine new ways of delivering strategic growth projects, ensuring that both Councils take appropriate decisions;
- Be given reports of issues affecting project delivery, and provide potential solutions.

### Individual Project Teams

The individual project teams will drive forward the delivery of the Growth Programme. The arrangements of individual project teams and project management procedures will be proportionate to the project being undertaken. Project teams will involve a lead officer and other officers providing technical support. Stakeholder engagement and communication will also be proportionate to individual projects.

### Other Boards, Committees and Partnership Forums

A number of other Boards, Committees and Partnership Forums will have an interest in the progression of the growth projects that have been identified within the Growth Programme. Resources will be focussed on delivering the priorities identified within the Growth Programme and therefore support to these other boards will be limited to where support is critical to progress the Growth Programme.

Where appropriate, existing Members' Project Groups will be used to ensure liaison between officers and members on each of the Deal priorities. A WSCC Cabinet Member representative (nominated by the Leader at WSCC) will be invited to existing groups operated by HDC to ensure members of both organisations have the opportunity to be involved in the progression of the projects. The WSCC Cabinet Member representative will liaise, at least every 6 months, with an identified Cabinet Member representative from HDC, supported as appropriate by officers and programme information, to ensure that the progress on the Deal as a whole is effectively monitored and progressed.

### **The Growth Deal Priorities**

The Action Plan set out in Appendix A sets out the key steps to take forward the four priorities identified within the Growth Deal. The aims of each priority are set out alongside the shared approach the councils will take to manage and monitor progress on individual projects. The "Partnership Lead" will have responsibility for the progress of work. They will also ensure appropriate input is provided by other partners, where appropriate. Three of these four priorities (North Horsham, the Town Centre Vision and Hurst Road), are included in the HDC Corporate Plan. The redevelopment of the Novartis site is a WSCC-led scheme that will involve an application by WSCC and determination of that application by HDC. Appendix A identifies key decision points – projects will only be progressed when the appropriate governance arrangements have been completed within each authority.

The Growth Priorities are:

1. Provision of Infrastructure to support the delivery of the developments at West of Horsham and North of Horsham;
2. Creation and delivery of a new town centre vision for Horsham ;
3. Rationalisation of the public estate in Hurst Road;
4. Redevelopment of the former Novartis Site in Horsham Town.

## Appendix A – Horsham District Deal- Growth Plan

### **Priority 1: Provision of Infrastructure to support the continued delivery of development West of Horsham and support an accelerated delivery of development North of Horsham**

The priority here is to take a holistic view of the remaining elements of the West of Horsham Infrastructure Package and the infrastructure package that supports the delivery of the permitted scheme at Land North of Horsham; how housing and economic growth at those locations integrate with Horsham town; and to identify whether key items of infrastructure can be provided early to accelerate the development of Land North of Horsham.

Horsham District Council granted outline planning permission for the application at West of Horsham (East) (DC/09/2138) on 17 August 2010 for up to 1,044 dwellings including provision of employment floorspace, fire station, community centre and expanded school facilities. Horsham District Council also granted outline planning permission for the application at West of Horsham (West) (DC/09/ 2101) on 3 October 2011 for the erection of 963 residential units, including land for a primary school, neighbourhood centre, youth and recreational facilities, other formal and informal open space, landscaping and environmental works, transport and access arrangements.

In terms of developing these sites, the majority of DC/09/2101 has been completed while work is ongoing with DC/09/2138. It is important that work on these two sites is completed, so that the developments and associated infrastructure can support wider growth in both Horsham town and the north Horsham area. and provide opportunities to expand and attract enterprise and investment. The scheme DC/09/2138 links to the redevelopment of Hurst Road and the provision of a fire station on site.

In addition to the works undertaken by the developers, the infrastructure package for the West of Horsham Development includes s106 contributions towards primary, secondary and sixth form education, libraries, and highways and transport. The latter includes two traffic management schemes, bus services, and four major junction improvements including the Newbridge Roundabout on the A281 and the Farthings Hill, Great Daux, and Robin Hood roundabouts on the A24. Delivery of the Newbridge and Farthings Hill schemes is scheduled for 2019/2020 with the Great Daux, and Robin Hood schemes to follow in 2020/2021. Completion of this infrastructure package is a priority.

Horsham District Council granted outline planning permission for the application at Land North of Horsham (DC-16-1677) on 22 May 2017 for up to 2,750 dwellings, a business park (up to 46,450 sqm), retail, community centre, leisure facilities, education facilities, public open space, landscaping and related infrastructure.

In terms of developing the site at North of Horsham, a key priority is the early provision of the new A264 Rusper Road roundabout and roundabout North of A264 Rusper Road, as well as the new signalised junction midway between A264 Rusper Road and Moorhead Road roundabout. The early provision of these key pieces of infrastructure provision would enable the accelerated delivery of new dwellings to be provided on site, in addition to the creation and promotion of employment floorspace, and the provision of education infrastructure. To achieve early delivery, alternative sources of funding would need to be secured, in advance of S106 contributions being received from the developer.

In addition, if identified as deliverable and approved by the Secretary of State, early delivery of a developer funded new railway station would provide impetus to the development of the eastern section of the site for employment use.

Other elements of infrastructure provision (e.g. health facilities, community infrastructure, retail, commercial leisure facilities floorspace) would be provided by the developer, as required in the s106 legal agreement, to support growth in Horsham Town and north Horsham and provide opportunities to expand and attract enterprise and investment from London and the South East.

<b>Key deliverables and activities</b>	<b>Partnership Lead</b>	<b>Subject Matter Expertise</b>
1. West of Horsham – delivery of the remaining key elements of the Infrastructure Package including the four major highway schemes.	WSCC	WSCC Planning and Highways Teams
2. North Horsham - commit to ensuring all relevant permissions are in place for development to commence.	HDC	HDC Planning
3. North Horsham - commit to providing timely transport and highway advice on reserved matters applications submitted.	WSCC	WSCC & HDC Planning Teams
4. North Horsham - WSCC to work with Horsham District Council, Network Rail /Department for Transport, Crawley Borough Council, and the North of Horsham/Kilnwood Vale developers to facilitate the delivery of new rail passenger facilities in and around new developments north of Horsham.	WSCC	WSCC Planning Team
5. North Horsham - WSCC and HDC working together to bring forward the required off-site highways infrastructure works, where possible ahead of schedule, and, developing a bid to secure funds to enable delivery of the projects ahead of the s106 contributions being collected. Key highways works comprise: <ul style="list-style-type: none"> <li>• North of A264 Rusper Road Roundabout</li> <li>• A264 Rusper Road Roundabout</li> <li>• New junction midway between A264 Rusper Road and Moorhead Roundabout</li> <li>• New footbridge</li> <li>• Moorhead Roundabout</li> </ul> The early completion of these works, if achievable, would accelerate the delivery of homes, commercial space, and education provision on-site.	HDC/WSCC	WSCC Growth Programme Delivery Manager  WSCC Planning & Highways Teams  HDC Planning Team
6. Working with Liberty to ensure the works and contributions securing on-site	HDC	HDC Planning Team

highways works, affordable housing, health facilities and community infrastructure are delivered.		
7. Employment – working with Liberty to ensure the early provision of the employment floorspace.	HDC	HDC Planning & Economy Teams  WSCC Growth Programme Delivery Manager and Economy Team
8. Working with education providers (including Free Schools Providers) to secure early provision of education infrastructure on-site. A new school is required on site for September 2020, and the new roundabout at Rusper Road/ new road to access the school would need to be in place for early 2019. If the highways works are not provided by early 2019, then a temporary solution to school provision would have to be found within the District.	WSCC	WSCC Planning & Education Teams  HDC Planning Team
<b>Subject to a governance decision to proceed</b>		
9. Subject to the outcome of the Network Rail study, the view reached by WSCC on any options, and the decision by the Secretary of State, progress agreed interventions to secure delivery of a new developer funded rail station.	HDC / WSCC	HDC Planning Team  WSCC Planning Team
10. Progress highways interventions identified in (6) above applying any forward funding secured through the bid.	WSCC	WSCC Planning and Highways Teams  HDC Planning Team
Outcomes for North of Horsham <ul style="list-style-type: none"> <li>• New Homes 2,750 homes</li> <li>• New Employment floorspace approx. up to 46,450 sqm</li> <li>• New school provision on site</li> <li>• New railway station (subject to final decision by the Secretary of State).</li> </ul>		

## **Priority 2: New Town Centre Vision for Horsham and Promotion of Horsham Town Centre**

Horsham District Council employed consultants in 2016 to prepare a “Town Centre Vision Statement” for Horsham town centre. The objective was to establish an aspirational, comprehensive and deliverable medium term vision (10-15 years) for Horsham town centre.

The consultants undertook a review of the context of Horsham, looking at broad population characteristics, retail, residential, officer and hotel market factors, and an analysis of the town centre’s current weaknesses and opportunities. This was developed into an analysis of broad opportunity areas within the town centre and specific examination of potential development sites. The consultants attempted to establish the nature of the existing town and its population, and to identify key drivers to understand how the town centre needs to change to adapt to compete with neighbouring retail centres, and to deal with key issues such as planned residential growth; demographic change; shifting retail and leisure patterns; protecting and enhancing Horsham’s historic environment; and taking advantage of potential development and improvement opportunities.

The Horsham Town Centre Vision Statement was approved at Cabinet on 23 November 2017. The Vision identifies a number of key projects and development sites that were included within a “Horsham Town Centre Vision Delivery Schedule” that was also approved at Cabinet on 23 November 2017. Key sites include:

- Station Quarter – scheme to enhance public realm between Horsham Station and town centre. Possible hotel redevelopment of Park House in conjunction with development of Hurst Road.
- West Street/Forum Link – Improve connectivity and appearance including the Blackhorse Way crossing (Develop waste/servicing strategy or develop scheme to reduce traffic flows and improve pedestrian facilities).
- Forum/Library 1 Western Area Explore scheme to improve use of site with a Civic hub combining library, health and advice facilities and improve links to Worthing Road/ Bus station
- Forum / Piazza 2 Southern area Explore potential to partially enclose with additional retail/residential uses.
- Bishopric 1 Eastern Area (Albion Way- west Street Detailed scheme to improve public realm and increase connectivity to John Lewis @Home and Waitrose)
- Bishopric 2 Western area Albion Way- Rushams Road Progress a detailed scheme to enhance public realm, western gateway and support retail function.
- Town Centre – East: progress Queen Street/Iron Bridge improvements, eastern gateway and links to East Street.
- Horsham Station/Royal SunAlliance car parks- explore options and develop schemes to increase parking capacity and potential for additional residential provision and for public use of car park

Key deliverables and activities	Partnership Lead	Subject Matter Expertise
1. Examine funding opportunities to deliver the projects identified in the “Horsham Town Centre Vision Statement”.	HDC	WSCC Growth Programme Delivery Manager and Planning Team  HDC Planning Team
2. Develop a Programme and Investment Strategy identifying key project priorities to be delivered between 2018 and 2023. The Programme and Investment Strategy will include consideration of each of the sites included in the “Town Centre Vision” alongside the benefits of progressing: <ul style="list-style-type: none"> <li>• a town centre public realm strategy</li> <li>• a walking and cycling strategy</li> <li>• a car parking strategy</li> </ul>	HDC	WSCC Growth Programme Delivery Manager and Planning Team  HDC Planning Team
<b>Subject to a Governance decision to proceed</b>		
3. Delivery of the agreed Town Centre Vision Programme and Investment Strategy	HDC	To be confirmed dependent on priorities identified.
<b>Outcomes</b> <ul style="list-style-type: none"> <li>• Potential for over 2,400 homes to be delivered in the wider Horsham town area, some of which will be due to the conversion of commercial premises to residential use under permitted development</li> <li>• Employment trajectory identifies provision of approximately 9,040 sqm of employment floorspace delivering 220 jobs in town centre</li> <li>• Provision of public realm and highways improvements across Horsham town centre</li> </ul>		

**Priority 3 : Hurst Road Redevelopment** – A mixed-use redevelopment scheme at Hurst Road, alongside a scheme to deliver a combined operational fire and police station and specialist “Blue Light” training centre.

Hurst Road is a key site identified in the “Horsham Town Centre Vision Statement”, giving the opportunity to deliver homes and other mixed-use development while rationalising and improving public sector services for Horsham residents.

The project will deliver the master planning and redevelopment of the existing Fire Station, Police Station, Horsham Magistrates Court, a site currently occupied by a Youth Club, Arun House, the Ambulance Station, and the Royal Mail sorting office with the potential to provide:

- Around 300 new homes
- Hotel/conference centre
- Potential 4,250 sqm of commercial/employment space
- 320 new jobs
- Combined Youth services provision off site
- Improved connectivity between Hurst Road to Horsham Park and the town centre

The redevelopment of these sites through the One Public Estate programme will enable significant rationalisation of public assets, the release of land to support future housing provision, commercial office and hotel development and improved youth provision.

The redevelopment will be carried out together with the enabling project for a new Blue Light Operational and Training Centre on WSCC land off the A24, Horsham. The project will see the relocation of existing public sector facilities including the Hurst Road police and fire stations and Youth Services.

<b>Key deliverables and activities</b>	<b>Partnership Lead</b>	<b>Subject Matter Expertise</b>
1. Work together following successful bids from One Public Estate phase 6 (November 2017) of £60,000 to HDC and £40,000 to WSCC to develop a business case (including an appropriate phasing proposal) to progress both elements of the scheme (HDC-led Development Brief for Hurst Road and WSCC-led Project for Combined “Blue Light Centre”) from initial feasibility to submission of planning applications.	HDC and WSCC	HDC Planning Team  WSCC OPE Team
2. Secure clarity on Ministry of Justice position and explore relocation options with Royal Mail.	HDC	HDC Planning Team  WSCC OPE Team

<b>Subject to a Governance decision to proceed</b>		
3. Coordinate relocation of Fire Station and Police Station from Hurst Road to new site off A24 to the west of Horsham – including site assembly, procurement of delivery mechanism and preparation of planning application.	WSCC	WSCC OPE Team
4. Re-provide Youth Centre, off-site with possible collaboration with YMCA Downlink services to develop jointly the Y Centre.	WSCC	WSCC OPE Team WSCC Youth Service
5. Coordinate redevelopment of Hurst Road site - including land assembly, procurement of delivery mechanism and preparation of planning application	HDC	HDC Planning Team WSCC OPE Team
6. Assessment of planning application for Hurst Road and Combined “Blue Light” Centre	HDC	HDC Planning Team
7. Subject to securing planning permission - On-site construction of scheme for Hurst Road	HDC	Joint Venture Partner Team
8. Subject to securing planning permission - On-site construction of scheme to relocate Fire Station and Police Station to new site off A24	WSCC	Joint Venture Partner Team
<p>Outcomes</p> <ul style="list-style-type: none"> <li>In combination with the enabling New “Blue Light” Operational and Training Centre, to deliver a rationalised public estate. Around 300 residential units including affordable housing could be provided on-site, including the potential for a 70 bed hotel/conference centre; potential for 4,250 sqm of employment space; relocated Fire and Police stations (to a site to the west of Horsham off the A24); and a re-provided youth service, in possible collaboration with YMCA Downlink Group based at the Y Centre, Albion Way.</li> </ul>		

**Priority 4: Redevelopment of the former Novartis Site, Horsham Town.**

The priority is to redevelop the former Novartis site in Wimblehurst Road, Horsham. Novartis closed the site in 2014, and it was purchased by West Sussex County Council in November 2016. The land at the former pharmaceutical research development and manufacturing site is 7.5 hectares.

This site is a key employment site in Horsham District, offering employment opportunities on the edge of Horsham town centre, and in close proximity to Horsham railway station, major roads (A24 and A264) and Gatwick Airport.

The key driver for WSCC’s investment in the acquisition was to sustain and build on the site’s long-established position as a major centre for high value employment, and a key contributor to the local, county and sub-regional economy.

Following acquisition, WSCC commissioned consultants to undertake initial site capacity analysis and development feasibility option assessments. In broad terms, this work confirmed the site’s suitability for commercial development, but less so for a specific health and life sciences park, which had been part of the initial vision.

Key deliverables and activities	Partnership Lead	Subject Matter Expertise
1. Undertake design work to enable a decision to progress the submission of an outline planning application	WSCC	WSCC Economy Team
2. Agree full business case and take governance decision on scheme delivery.  <b>Subject to WSCC governance decision to proceed</b>		
2. Prepare & submit Outline planning application to HDC		HDC Planning team  WSCC Economy Team
3. Determine outline planning application.		HDC Planning
4. Seek full planning permission		WSCC Economy, Transport & Highways Teams
5. If Full planning permission is granted, on-site construction to be progressed.		WSCC Economy Team
<b>Outcomes</b> <ul style="list-style-type: none"> <li>• <u>Redevelopment of the former Novartis site (subject to planning permission)</u></li> </ul>		

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## Report to Cabinet

20<sup>th</sup> September 2018

By the Cabinet Member for Community and Wellbeing

### **DECISION REQUIRED**



**Horsham  
District  
Council**

Not Exempt – Appendix 1 Exempt under Part 1 of  
Schedule 12A to the Local Government Act 1972

## **Rowan Drive, Billingshurst. Approval of a supplementary capital budget**

### **Executive Summary**

On 22<sup>nd</sup> March 2018, Cabinet approved the appointment of a contractor to proceed with the construction of 17 residential units on two development sites at Peary Close and Rowan Drive within an approved budget allocation of £3m. Both projects were subject to planning consent being received.

The Council continues to have a requirement for additional temporary accommodation to support families in housing need and to reduce the Council's use of bed and breakfast accommodation.

Planning consent was obtained for the redevelopment of Peary Close. The contract was subsequently let and works have commenced on site, with a target completion date of 17<sup>th</sup> May 2019.

The proposed redevelopment of Rowan Drive was deferred at planning committee stage, owing to objections received during the planning process. The scheme was redesigned and resubmitted in order to address the key objection. The new scheme will now be considered by the planning committee.

Three additional cost elements have arisen since March 2018; firstly, the cost of the redesign of Rowan Drive secondly, additional costs arising from the decoupling of the two construction projects and thirdly, the payment of Community Infrastructure Levy (CIL) which is unexpectedly due because temporary accommodation is not excluded from CIL.

As a result of these factors, Cabinet is requested to approve an additional capital budget allocation of £175,000, which will increase the overall capital budget envelope to £3,175,000 and to recommend Council to approve a supplementary capital budget for this purpose. The proposed additional budget is net of savings achieved through the management of the projects during pre-construction design process.

The Council continues to work with the contractor approved by Cabinet on the 22<sup>nd</sup> March and the revised capital budget envelope is based on the contract sum agreed with them. The breakdown of the contract sum and additional cost elements is included in exempt appendix 1.

## **Recommendations**

For Cabinet to:

- i) Approve an increase in the capital budget envelope from £3m to £3.175m and
- ii) To recommend to Council that a supplementary capital budget of £175,000 is approved for this project.

## **Reasons for Recommendations**

To enable the Council to provide additional temporary accommodation for eligible families in housing need.

## **Background Papers**

None

**Wards affected:** All

**Contact:** Brian Elliott, Head of Property and Facilities 01403 215328

## **Background Information**

### **1 Introduction and Background**

- 1.1 The Council has a requirement for additional temporary residential accommodation for the purpose of housing eligible families in need and to reduce the Council's reliance on bed and breakfast accommodation.
- 1.2 It is proposed to develop 17 residential units for these purposes. One site is a former scout hut at Peary Close, Horsham, where construction has commenced on 8 units and the other is a sub-standard block of garages in Rowan Drive, Billingshurst, where planning consent is being sought for 9 residential units. The current approved budget allocation of £3,000,000 spans 2017/18 and 2018/19.
- 1.3 Unexpected cost increases have arisen because of
  - (i) Additional design input required as a result of objections received during the planning application process for Rowan Drive
  - (ii) The decoupling of the timing of the two projects owing to delays on Rowan Drive, which means that some cost efficiencies have been lost and
  - (iii) The application of CIL to the two schemes.
- 1.4 These cost increases require an additional capital budget allocation of £175,000. The details of the additional costs are set out in Appendix 1 (Exempt).
- 1.5 The new units will produce an income of c£118,000 pa net of a 20% allowance for void and management costs. Subject to approval the capital budget will increase to £3.175m, which will be funded by commuted sums. On completion, the projects are forecast to deliver a 3.7% return on capital invested, compared to the 4% originally envisaged when Cabinet approved the proposal on the 22<sup>nd</sup> March 2018. These figures ignore the potential cost saving from decanting families from bed and breakfast accommodation.

### **2 Relevant Council policy**

- 2.1 The development of residential property for temporary accommodation supports the Council's statutory responsibility to provide accommodation for families in housing need. The Council has a shortfall of accommodation, which means that expensive bed and breakfast accommodation is often used and development of further accommodation will reduce such expenditure.

### **3 Details**

- 3.1 The Council currently manages 76 units of temporary residential property throughout Horsham District. This is used to discharge the Council's statutory duty pursuant to Part VII of the Housing Act 1996 (as amended). The demand for temporary accommodation has increased following the implementation of the Homeless Reduction Act 2018, as the duties towards homeless households are expanded.

- 3.2 The two sites, at Peary Close and Rowan Drive, are surplus parcels of land, which can, subject to planning, be developed to provide 17 residential units for use as temporary accommodation, consisting of 5 one bed units and 12 two bed units. There continues to be an imbalance of demand and supply in the Council's temporary housing portfolio and there are currently 28 (end of July 2018) households in bed and breakfast. These developments will increase the size of the temporary portfolio to 93 units and will enable the Council to reduce reliance upon costly and inappropriate bed and breakfast accommodation and provide capacity to review the temporary accommodation portfolio. .
- 3.3 Planning application was secured on Peary Close and the contract has been let and construction commenced. A revised scheme for Rowan Drive is being considered by the planning committee on the 18<sup>th</sup> September 2018. This proposal for the approval of a supplementary capital budget is conditional on a satisfactory planning permission being obtained.
- 3.4 The recommended supplementary capital budget is required because of additional costs in three areas. The cost allocation for these elements is included in exempt appendix 1:

(i) Design Changes.

The original design for Rowan Drive incorporated a flat roof, but objections were received during the planning process saying that this was out of character with the locality. These objections have been taken on board and a new design has been submitted for planning, which incorporates a pitched roof.

(ii) Decoupling costs

The original proposal was to let the two contracts together, which would bring efficiency savings because of the opportunity to combine meetings with the professional team and would reduce contractor preliminaries. The delay to Rowan Drive has meant that this could not be achieved which will result in increased costs.

(iii) Community Infrastructure Levy (CIL)

While affordable housing is exempt from CIL, unfortunately owing to the definitions within the planning legislation, temporary accommodation is not. This means that the Council will need to incur this expenditure despite the fact that these units will be let to families in housing need at affordable rents.

## **4 Next Steps**

- 4.1 Approval of the supplementary capital budget will allow the development to proceed and works to commence on Rowan Drive in November 2018, subject to planning.

## **5 Outcome of Consultations**

- 5.1 Comments from the Monitoring Officer and Director of Resources are incorporated in this report.

- 5.2 The Finance and Assets Policy Development and Advisory Group agreed in principle with this development.

## **6 Resource Consequences**

- 6.1 The project will provide an income return to the Council, albeit less than the 4% return originally envisaged. However this return does not include the savings on bed and breakfast costs that should reduce as a result of this additional temporary accommodation.
- 6.2 As with all developments, there are financial risks but these risks have been substantially closed. The contract sum for Peary Close passes all construction risk, including in ground risks, to the contractor. The contract sum for Rowan Drive retains the risk for additional costs to the Council if contamination is found on site and a contingency has been allocated for this.

## **7 Legal Consequences**

- 7.1 The Constitution requires Council to approve supplementary budgets.

## **8 Risk Assessment**

- 8.1 As previously stated there are risks associated with property development, however the risk register does not identify any out of the ordinary risks and a contingency has been set aside for this eventuality.

## **9 Other Considerations**

- 9.1 There are no impacts on human rights or disability access. The new schemes incorporate the possibility of electricity charging points being installed for resident's cars at a future date, if required.

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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## **Report to Cabinet**

20<sup>th</sup> September 2018

By the Cabinet Member for Local Economy

**DECISION REQUIRED**

Not Exempt

### **Dukes Square Car Park Pay and Display Introduction**

#### **Executive Summary**

Dukes Square Car Park is located behind the Drill Hall just off Denne road. The car park is currently only available to season ticket holders only, 24hrs a day 7 days a week. The season tickets are predominantly sold to businesses that are based in the area who require the majority of their parking during core business hours (Monday to Friday 9am to 6pm).

A number of surveys have highlighted that outside of those core business hours the car park is rarely used, leaving a number of spaces that could be made available to support visitors to the town centre during the weekend and evenings.

These spaces could be better utilised by introducing pay and display parking outside of those core business hours, especially with the need of spaces on that side of town with Piries Place car park currently closed.

It is proposed that a short stay pay and display option with the same tariff as Denne Road car park (opposite) is introduced outside of those core hours – Monday to Friday 6pm to 8pm and Saturday and Sunday all day.

#### **Recommendations.**

The Cabinet is recommended:

1. To introduce public pay and display car parking in the evenings 6pm to 8pm Monday to Friday, 8am to 8pm Saturday and 9am to 5pm Sundays and Bank Holidays (with the same tariffs as Denne Rd car park).
2. Maximum stay 3 hours parking at any one time.

#### **Reasons for Recommendations**

The reasons for recommending the introduction of pay and display parking in the Dukes Square car park are:

- i) The car park is currently a season ticket holder only car park; however surveys indicate that outside of the core working hours there is minimal use. Spaces would be available for public pay and display parking, thus fully utilising the car park.
- ii) The location of Dukes Square car park is in a prime location for additional parking, especially on the side of town that has temporarily lost Piries Place car park
- iii) There is a potential for increasing parking income.

## **Background Papers**

N/A

**Wards affected:** All town centre wards

**Contact:** Ben Golds, Head of Parking Services, 01403 215055

Jane Eaton, Director of Corporate Resources, 01403 215300

## **Background Information**

### **1 Introduction and Background**

- 1.1 Dukes Square Car Park is located behind the Drill Hall off Denne Rd. The car park is currently a season ticket only car park 24hrs a day 7 days a week. The car park is also being used to temporarily accommodate the residents of Burtons Court whilst the redevelopment of Piries Place takes place.
- 1.2 Recent surveys indicate that there is minimal use within this car park outside of the core working hour's (Monday to Friday 9am to 6pm) meaning there are plenty of spaces available for public pay and display parking. The location of Dukes Square car park is in a prime location for parking within the town; it is opposite one of HDC's most popular car parks Denne Rd CP which is regularly full.
- 1.3 The introduction of an evening charge would be beneficial for those customers who visit restaurants in East Street, especially with the current closure of Piries Place.
- 1.4 It is proposed that the tariff and maximum parking period replicates the one that is currently on offer in Denne Rd car park (which is opposite).

Maximum stay in the car park - 3 hours parking at any one time.

Tariff: 1 hr - £1.40, 2 hrs - £2.80, 3 hrs - £4.20,

Evening charge: £1.00

Sunday and Bank Holiday: £1.50 (all day)

- 1.5 HDC have recently replaced a number of pay and display machines in car parks across the town centre; a number of the older machines were kept back so they could be reused for spares or for a situation such as this meaning the proposal can be introduced with very small investment. If the use of the car park proves to be sufficient then a new machine can be purchased at a later date.
- 1.6 The proposal is being made to address the removal of parking spaces due to the development of Piries Place car park; but there is a potential for increasing parking income. London Road car park, which works in a similar way as proposed here, generates around £11k a year.

### **2 Relevant Council policy**

- 2.1 This supports the relevant Corporate Plan priorities set out below:
- 2.2 Economy – Improve and support the local economy  
Particularly through the Production and implement, a strategy for the management of off street car parks across the district.
- 2.3 Efficiency – Great value Services  
Particularly through delivering a balanced budget over the medium term.

### **3 Details**

- 3.1 To introduce public pay and display car parking in the evenings 6pm to 8pm Monday to Friday, 8am to 8pm Saturday and 9am to 5pm Sundays and Bank Holidays within the Dukes Sq car park. The tariff and maximum stay would replicate that of Denne Rd car park (which is opposite).
- 3.2 The proposal is being made predominately to address the removal of parking spaces due to the development of Piries Place car park, maximise the use of the car park during quieter hours and to increase parking income.
- 3.3 Proposed tariff:

<b>Hours</b>	<b>Tariff</b>
<b>&gt;1hr</b>	£1.40
<b>2 hrs</b>	£2.80
<b>3 hrs</b>	£4.20
<b>Evening Charge (6pm-8pm)</b>	£1.00
<b>Sunday and Bank Holidays</b>	£1.50 (all day)

Maximum stay 3 hours parking at any one time (applies to Saturdays only).

- 3.4 Minor changes to the signage, software and order boards, will need to be undertaken, these can be absorbed within current budgets.
- 3.5 The introduction of an evening and weekend charge in Dukes Square car park is likely to generate an income. Based on similar car parks and the location it is proposed that there will be an annual income of £12,000

## **4 Next Steps**

- 4.1 There are a number of steps that need to be followed to meet the requirements of the constitution and Traffic Management Act 2004 to change the car park name and tariffs. The remaining steps are:

<b>Date</b>	<b>Action</b>
20 <sup>th</sup> September 2018	Cabinet decision
21 <sup>st</sup> September 2018	Public Consultation
19 <sup>th</sup> October 2018	End of Consultation – 5 day cool off
1 <sup>st</sup> November 2018	Go live

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

- 5.1 Comments from the Local Economy PDAG group will be gathered at the meeting on 12<sup>th</sup> September.
- 5.2 Director of Corporate Resources supports these proposals.

## **6 Other Courses of Action Considered but Rejected**

- 6.1 The purpose of the proposal is to introduce additional parking for the public with the closure of Piries Place car park and maximise the use of the Dukes Sq car park which is currently only used Monday – Friday 9am to 6pm.
- 6.2 There are very limited opportunities to increase the number of public parking spaces, particularly leading up to Christmas and on this side of town.

## **7 Resource Consequences**

- 7.1 Based on similar car parks and the location of Dukes Sq it is estimated that there could be an opportunity to increase parking income. The introduction of an evening and weekend charge in Dukes Square car park is likely to generate an annual income of £12,000.
- 7.2 The cost to implement the changes are very small with a likely cost of £800, this can be absorbed in current budgets.
- 7.3 The car park will be enforced by the Civil Enforcement Officers. This car park is already being enforced as it is currently season ticket holders only 24/7; because of this there is no need to add additional enforcement resources to cover the enforcement requirements.
- 7.4 There are no HR consequences.

## **8 Legal Consequences**

- 8.1 Changes to a Parking Order Process – To adhere to the Traffic Management Act 2004 the Council will have to undertake a 21day public consultation on the proposed changes, this is through advertisement in the car park and local paper. The Council will then consider any representations and if any amendments will need to be made to the order.
- 8.2 Traffic Management Act 2004 must be considered for any enforcement changes.

## **9 Risk Assessment**

- 9.1 As with any new parking charges being introduced such as tariff changes there is always a concern of displacement of cars onto surrounding residential roads. This is unlikely within this case as there are very limited areas vehicles can be displaced to due to limited options within the area and the immediate highway being covered by a controlled parking zone.
- 9.2 Any decision Cabinet make still be subjected to public consultation as per the Parking Order amendments.

## **10 Other Considerations**

- 10.1 The Councils provision for disabled parking remains unchanged.

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## Report to Cabinet

20 September 2018

By Brian Donnelly (Cabinet Member for Finance and Assets)

### DECISION REQUIRED



**Horsham  
District  
Council**

Not Exempt

### 75% localisation of Business Rates 2019/20 Pilot Scheme

## Executive Summary

In 2018/19, all councils in West Sussex agreed to submit a bid for 100% localisation of Business Rates, but the bid was not successful.

On 24 July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) invited pilot bids for 75% localisation of Business Rates in 2019/20. All the councils in West Sussex have again modelled detailed financial scenarios and are considering whether to submit a bid before the submission deadline of 25 September 2018.

## Recommendations

Cabinet is recommended to:

- i) Approve the submission of a bid to the MHCLG for the Council to take part in the 2019/20 pilot for 75% Business Rate retention.

## Reasons for Recommendations

- i) 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.

## Background papers

DCLG's invitation for pilots:

<https://www.gov.uk/government/publications/75-business-rates-retention-pilots-2019-to-2020-prospectus>

**Wards affected:** All

**Contact:** Jane Eaton, Director of Corporate Resources, 01403 215300

## **Background Information**

### **1 Introduction and background**

- 1.1 The current local government funding methodology includes 50% localisation of Business Rates. In two-tier areas, 40% is allocated to the Council and 10% to the County Council. In practice, however, a system of tariffs means that the Council actually retains much less, and most significantly we only retain 20% of any growth in business rates due to a 50% levy being applied to our 40% district share. West Sussex County Council retains 10% of growth.
- 1.2 In the current financial year the government is trialling 100% retention, as a precursor to fulfilling their intention to roll out some form of greater localisation of business rates in the 2020s. The councils of West Sussex submitted a bid in 2018/19 to be part of the pilot scheme, but were unsuccessful. On 24 July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) invited further bids for pilot areas in 2019/20, this time using 75% retention.
- 1.3 With 75% localisation, potentially more 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, the levy applied to growth would be reduced from 50% to 25%, and so a larger proportion of the growth in business rates would be retained (split 25% for central government and 75% between the county and district councils).
- 1.4 Councils wishing to be considered for pilot status in 2019/20 have to submit their bids to MHCLG by 25 September 2018. It is likely that there will be a competitive process and not all bids will be successful. MHCLG intends to announce the outcome of the bidding process by December 2018, probably at the same time as the annual Local Government Finance Settlement.
- 1.5 The West Sussex Finance Officers, supported by financial management experts, have undertaken detailed and complex financial modelling work, which has been reviewed at the West Sussex Leaders / Chief Executives meeting on 10 September 2018, where it was agreed to take the pilot bid forward.

### **2 Relevant Council policy**

- 2.1 Working with partner councils across West-Sussex to benefit residents and businesses helps to provide great value services, which is a Corporate Plan objective.

### **3 Details**

- 3.1 A West Sussex pilot bid for the 100% retention scheme was submitted in 2018/19 that was not successful. The 2019/20 bid builds upon the experience gained from this process.

- 3.2 The key difference this year is the tier split i.e. how much growth will be retained by county and district councils. This has been modelled with two options:
- 35% county and 40% district; and
  - 55% county and 20% district.
- 3.3 Both options assume that the increase in local share would all be allocated to the County Council. The expectation is for a 35% county share to be in line with other proposals in other counties, whereas a 55% county share would be significantly higher than most other bids. This is not necessarily a bad thing: MHCLG will want to explore how risk and reward operates in a pilot with a much higher county share.
- 3.4 For West Sussex, the tier splits do not have any impact on the financial gains for individual authorities because there is a 100% top-slice for investment.
- 3.5 Finance officers, supported by financial management experts, have modelled different scenarios. Based on the forecast business rate income for 2019/20, the estimate is that the West Sussex 75% pilot could generate an additional £14.6m in retained rates (compared to the £4.5m under the current 50% pool arrangements).
- 3.6 There are already some well-developed investment proposals to be funded from the current pooled arrangements pot, which could be expanded for any additional pilot pot, of which super-fast broadband alongside the county's railway lines is the most likely option.
- 3.7 Experience of having operated a business rate pool in the county means that much of the existing risk mitigation and governance arrangements has been built upon as part of this submission. The potential risks and mitigation in relation to this pilot bid are set out in the risk assessment section of this report.
- 3.8 The chief executives and leaders of the West Sussex councils considered the bid on 10 September 2018 and agreed to take the bid forward. The submission deadline to MHCLG is 25 September 2018. MHCLG are likely to announce successful submissions in December 2018. Depending on the deadline for acceptance it is intended that the final decision be reported back to Cabinet for final sign off. If, however, MHCLG deadlines means that it is not possible to take the matter back to Cabinet, urgency provisions may need to be exercised in accordance with the constitution.

## **4 Next steps**

- 4.1 If the recommendation to submit the bid is approved, the bid will be submitted to MHCLG by the 25 September 2018.

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

- 5.1 Financial officers, supported by financial management experts, have prepared a West Sussex county-wide bid. It has not been practicable to take a draft through the Finance and Assets Policy Development Advisory Group in the normal way as the detailed and complex financial modelling has only just been completed. The draft report was circulated to all Members of the PDAG and a verbal update of any comments will be made at the Cabinet meeting by the Cabinet Member for Finance and Assets should any further information be available.

- 5.2 All district, borough and county councils in West Sussex will need to collaborate on a scheme for a bid to be successful. On 10 September 2018, the chief executives and leaders of the West Sussex councils met and agreed to take the pilot bid forward. Each council is also consulting with their Members according to their own constitutional requirements.
- 5.3 The views of the Monitoring Officer are incorporated into this report which helps to ensure legal probity.

## **6 Other Courses of Action Considered but rejected**

- 6.1 The Council could continue to be involved in pooling arrangements for the West Sussex Business Rate pool for 2019/20. West Sussex benefits from the pooling arrangements as it enables more of the growth to be retained (50%) than would be the case without a pool (30%). This benefit is then shared between the councils. However a successful pilot bid would enable even more growth to be retained.

## **7 Resource and legal consequences**

- 7.1 The submission of a bid does not require additional resources. A successful bid should generate additional revenue for the West Sussex councils, and help government shape the future roll out of more localised business rates. Equally, however, if income from Business Rates falls, the Council could be more exposed to the downside risk.
- 7.2 To be accepted as a pilot for 2019/20, agreement must be secured locally from all relevant authorities to be designated as a pool for 2019/20 (in accordance with Part 9 of Schedule 7B to the Local Government Finance Act 1988) and to put in place local arrangements to pool their additional business rates income.

## **8 Risk assessment**

- 8.1 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.
- 8.2 There is, however, a potential risk that taxation receipts do not grow as fast as spending on the additional responsibilities. For the 2019/20 pilots, MHCLG is proposing that there will not be any “no detriment” support. “No detriment” ensured that the members of the pilot would not be any worse-off in the pilot than they would have been in the 50% scheme.
- 8.3 The bid contains a recommendation that the first use of any additional resources within the pilot is to fund the Minimum Funding Guarantee within the scheme. i.e. that no authority will be worse-off than they would be in the main 50% scheme.
- 8.4 The model indicates that West Sussex authorities would collectively only be worse-off in the 75% pilot if aggregate income fell by around £40m. For this to occur, all the known risks would have to happen in 2019/20 (approximately £18m) plus a further £22m in losses. The considered view though is that even this “doomsday” scenario would still leave the West Sussex pilot better off than the member authorities would have been in the current 50% scheme pool.

## **9 Other considerations**

- 9.1 There are no implications of any action proposed in respect of Crime & Disorder; Human Rights; Equality & Diversity and Sustainability at this stage.

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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 may also include 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](http://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](mailto:committeeservices@horsham.gov.uk)

Tel: 01403 215123

Published on 01 September 2018 (updated 07 September 2018)

**Page 224** **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.

	<b>Subject/Decision</b>	<b>Decision Taker</b>	<b>Date(s) of decision</b>	<b>Is all or part of this item likely to be dealt with in private</b>	<b>Contact Officer</b> <b>Cabinet Member</b> (NB include name, title and email address)
1.	<b>Development of industrial units at Oakhurst Phase 4</b> Policy Development Advisory Groups 31 October and 5 November 2018	Cabinet	22 Nov 2018	Part exempt	Brian Elliott, Head of Property & Facilities brian.elliott@horsham.gov.uk  Cabinet Member for Finance and Assets (Councillor Brian Donnelly), Cabinet Member for Local Economy (Councillor Gordon Lindsay)
2	<b>Proposal to sell surplus council assets</b> Policy Development Advisory Group 5 November 2018	Cabinet	22 Nov 2018	Part exempt	Brian Elliott, Head of Property & Facilities brian.elliott@horsham.gov.uk  Cabinet Member for Finance and Assets (Councillor Brian Donnelly)
3.	<b>Additional Temporary Accommodation options</b> Policy Development Advisory Group 29 October 2018	Cabinet	22 Nov 2018	Open	Rob Jarvis, Head of Housing Services robert.jarvis@horsham.gov.uk  Cabinet Member for Community and Wellbeing (Councillor Tricia Youtan)

	<b>Subject/Decision</b>	<b>Decision Taker</b>	<b>Date(s) of decision</b>	<b>Is all or part of this item likely to be dealt with in private</b>	<b>Contact Officer</b> <b>Cabinet Member</b> (NB include name, title and email address)
4.	<b>Medium Term Financial Strategy update</b> Policy Development Advisory Group 5 November 2018	Cabinet Council	22 Nov 2018 5 Dec 2018	Open	Dominic Bradley, Head of Finance dominic.bradley@horsham.gov.uk  Cabinet Member for Finance and Assets (Councillor Brian Donnelly)
Page 226	<b>Insurance Contract</b> Policy Development Advisory Group 5 November 2018	Cabinet	22 Nov 2018	Part exempt	Dominic Bradley, Head of Finance dominic.bradley@horsham.gov.uk  Cabinet Member for Finance and Assets (Councillor Brian Donnelly)
6.	<b>Council Tax Reduction Scheme</b> Policy Development Advisory Group 5 November 2018	Cabinet Council	22 Nov 2018 5 Dec 2018	Open	Jane Eaton, Director of Corporate Resources jane.eaton@horsham.gov.uk  Cabinet Member for Finance and Assets (Councillor Brian Donnelly)

	<b>Subject/Decision</b>	<b>Decision Taker</b>	<b>Date(s) of decision</b>	<b>Is all or part of this item likely to be dealt with in private</b>	<b>Contact Officer</b> <b>Cabinet Member</b> (NB include name, title and email address)
7.	<b>Environmental Enforcement Policy</b> Policy Development Advisory Group 19 November 2018	Cabinet	22 Nov 2018	Open	John McArthur, Head of Waste, Recycling, Street Scene & Fleet Services john.mcarthur@horsham.gov.uk  Cabinet Member for Waste, Recycling and Cleansing (Councillor Philip Circus)
8.	<b>Re-provision of athletics track</b> Policy Development Advisory Group 14 November 2018	Cabinet	22 Nov 2018	Open	Adam Chalmers, Director of Community Services adam.chalmers@horsham.gov.uk  Deputy Leader and Cabinet Member for Leisure and Culture (Councillor Jonathan Chowen)
9.	<b>Car parking charges - Hurst Road car park (The Pavilions)</b> Policy Development Advisory Group 31 October 2018	Cabinet	22 Nov 2018	Open	Ben Golds, Head of Parking Services ben.golds@horsham.gov.uk  Cabinet Member for Local Economy (Councillor Gordon Lindsay)

	<b>Subject/Decision</b>	<b>Decision Taker</b>	<b>Date(s) of decision</b>	<b>Is all or part of this item likely to be dealt with in private</b>	<b>Contact Officer</b> <b>Cabinet Member</b> (NB include name, title and email address)
10.	<b>Affordable Housing Investment - Creation of a Housing Company</b> Policy Development Advisory Group 18 December 2018	Cabinet	24 Jan 2019	Open	Rob Jarvis, Head of Housing Services robert.jarvis@horsham.gov.uk  Cabinet Member for Community and Wellbeing (Councillor Tricia Youtan)
11.	<b>Budget 2019/20</b> Policy Development Advisory Group 7 January 2019	Cabinet  Council	24 Jan 2019  13 Feb 2019	Open	Jane Eaton, Director of Corporate Resources jane.eaton@horsham.gov.uk  Cabinet Member for Finance and Assets (Councillor Brian Donnelly)