



**Horsham  
District  
Council**

**LOCAL PLAN REVIEW**

**ISSUES AND OPTIONS – EMPLOYMENT, TOURISM AND  
SUSTAINBLE RURAL DEVELOPMENT**

**Cabinet draft - 22 March 2018**

**DRAFT**

## **CONTENTS**

- 1.0 Introduction**
- 2.0 Economic Development**
- 3.0 Supporting the Visitor Economy**
- 4.0 Sustainable Rural Development**
- 5.0 Next Steps**

DRAFT

## 1.0 INTRODUCTION

### An introduction to Horsham District

- 1.1 Horsham district is a predominantly rural district, containing the larger market town of Horsham in the north east and a number of smaller villages and towns through the rest of the District. The area is well connected, located mid-way between London and the south coast, and has good road and rail connections to both these areas. The district also has excellent international links, with Gatwick Airport directly adjoining the District boundary to the north east. The population is generally highly skilled, with 47.7% of residents educated to degree level or higher. Horsham boasts one of the lowest unemployment rates in the country. Although a high number of people in the district are employed locally, there are large numbers who commute outside the District to roles where salaries are generally higher.
- 1.2 The towns and villages in Horsham District are generally historic in nature, with buildings and structures in the district dating back to Norman times and creating attractive and characterful urban environments, many of which are listed buildings or are designated as a Conservation Area. Most settlements offer a number of services and facilities for those who live there including high quality local schools, shops, sports facilities and open spaces, together with some local employment. Together these create thriving and friendly communities in which people wish to live and work.
- 1.3 In addition to its great connections and attractive towns and villages, Horsham District has a high quality environment, with much of the district dominated by attractive countryside, some of which is of national landscape importance, such as the High Weald Area of Outstanding Natural Beauty (AONB) and the South Downs National Park. This countryside helps to provide 'ecosystem services' such as carbon storage, flood attenuation and mitigation against air pollution which then support many of the human activities that take place in both our towns and villages, providing essential environmental services. The countryside also supports wildlife, some of which (such as bees) also provide essential ecosystem services to humans. Some land has been identified as being nationally and locally important for the wildlife it supports, and it is also clear from those who live in the district that this wildlife is valued and cherished down to a very local level.
- 1.4 The attractive towns and villages, linkages and high quality environment in the district do however create pressures such as rising house prices, especially as the area is considered an attractive place to live and work. The district will continue to meet the needs of existing and future residents, but this must be balanced against the need to ensure that the high quality environment together with the key environmental services which it provides are retained. This need for 'sustainable development' is recognised not only in the Council's wider objectives but also is a key requirement of National Planning Policy.

## Local Planning Context

- 1.5 In November 2015, the Council adopted the Horsham District Planning Framework (HDPF). Outside the South Downs National Park (SDNP), this document sets out the Council's planning strategy to 2031 to deliver sustainable development, balancing the social, economic and environmental needs of the plan area. The Site Allocations Document, adopted in 2007, and the West of Bewbush Joint Area Action Plan, adopted in 2009, together with a number of neighbourhood plans, also form part of the Council's adopted Development Plan for the district outside the South Downs National Park. The Core Strategy, 2007 currently forms part of the Development Plan for the district that lies within the National Park together with the South Downs National Park Local Plan.
- 1.6 It is a requirement that Local Plans are monitored and are reviewed regularly to ensure that they are kept up-to-date. The Inspector who undertook the independent examination of the HDPF concluded that further work would be needed by the Council to identify the future accommodation needs of Gypsies and Travellers and to ensure that sufficient land was made available to meet the needs of businesses and to support economic growth. He also indicated that a review of the plan should commence within three years to ensure that wider long term needs in the District could be met.
- 1.7 Since the adoption of the HDPF, the Council has progressed a Gypsy, Traveller and Travelling Showpeople Site Allocation document. Early consultation has taken place in April – June 2017 and again between December 2017 and January 2018. Work is now on-going to prepare a Proposed Submission document to identify the accommodation needs for this community and identify land to meet this need.
- 1.8 This document forms the first phase of the review of the Horsham District Planning Framework and the preparation of the new Horsham District Local Plan which will run to 2036. This first part of the document will consider both the locational strategy for economic growth and set out a number of sites which may have the potential for allocation as employment sites. It also considers some of the existing policies set out in the Economic Development chapter (chapter 5) of the HDPF.
- 1.9 The second section of this document considers how the Council can achieve sustainable development in the more rural parts of Horsham district. Geographically, this covers the greatest extent of the district's area, and it is important that those who live and work in these areas can continue to do so whilst still protecting the essential rural character. This section considers policies in a few existing chapters of the HDPF, but particularly relates to development that takes place outside existing defined built-up area boundaries.
- 1.10 The proposals and draft policies and issues set out in this document are for consultation purposes only and **do not form Council policy at this stage**. All responses that are received on this consultation will be taken into account and where appropriate, additional evidence may be gathered and policies updated in light of the comments received. Further information on the next stages of Local Plan preparation and how to comment are set out in chapter 5.

## 2.0 ECONOMIC DEVELOPMENT

### THE ECONOMIC CONTEXT OF HORSHAM DISTRICT

#### The Gatwick Diamond

- 2.1 The majority of the Horsham district is located within the Gatwick Diamond economic area, which extends from Croydon in the north, around Gatwick Airport and down the A23 corridor to the south coast. (See Map 1) Residents living in Horsham district contribute to this wider regional economy.

Map 1 – The Gatwick Diamond ([www.gatwickdiamond.co.uk](http://www.gatwickdiamond.co.uk))



- 2.2 Horsham town is the main employment centre within the district, but residents also commute to work outside the district. The net commuting outflow from the District is around 10,000 with 26,854 working outside the district compared with 16,728 who commute to work inside the district (HDC Economic Profile). Outside the district, the main places of work are Crawley/ Gatwick and London, although the south coast corridor is also an important employment centre for residents in the south east of the district.

- 2.3 The most common employment sector in the district is business and professional services, but the rural economy, including agriculture and tourism are also important outside the main towns and villages. Many of the businesses in Horsham district are small in size, employing between 1 and 4 employees, many of whom are based in the home. Larger employers, (more than 250 people) are also present in the district and a few businesses employ more than 250 people. There are a number of high-tech firms operating in the district as well as a number of industrial estates located within settlements across the district and in the rural area. Unemployment levels are lower than for the South East or nationally. The workforce is generally highly skilled, with 47.7% of residents educated to degree level or higher).
- 2.4 Over the past few years, whilst the district has been shown to have a good quality of life, data relating to the economic performance within the District has been poor. For example, when looking at the trend of changes in business rateable values, which is a measure of relative economic growth, the district is ranked 288 out of 353 local authorities. This indicates that economic growth has been relatively low when compared against other local authorities.
- 2.5 Current evidence shows that there are a number of issues affecting economic growth in the District:
- A limited supply of office, industrial and warehouse facilities (B1 and B8 uses). This has arisen due to a modest increase in demand, loss of existing stock to alternative uses and a limited level of new development coming forward.
  - Two thirds of the district's commercial office space lies within Horsham town with most of the rest in Southwater and North of the A264. Industrial spaces is more evenly distributed across the District.
  - There is a continuing increase in out-commuting from the district. A large proportion of residents seek well-paid jobs in London, Gatwick and Croydon.
  - Many jobs within the Horsham district area are not well paid.

As a result of these factors there is concern that without further employment growth a 'dormitory district' will be created with people travelling to work outside the district during the day and only returning in the evenings or at weekends.

### **The Horsham District Council Economic Strategy**

- 2.6 Since the adoption of the HDPF, the Council has developed a wider corporate Economic Strategy for the period 2017-2027. It recognises that Horsham District Council has a key role in driving economic growth and in creating conditions that support the local economy, and remove barriers that stop businesses creating jobs.
- 2.7 The strategy identifies a number of strengths, weaknesses, opportunities and threats, some of which are summarised in the table overleaf. The SWOT analysis was used to identify a number of key corporate priorities to ensure economic growth within Horsham district. The Local Plan will need to ensure that it contributes to these objectives where relevant.

- 1) Inward Investment – attracting new companies to new strategic sites such as Land north of Horsham
- 2) Enterprise – enabling businesses to start up and grow. This requires a range of quality commercial floorspace to be available to these businesses
- 3) Skills and Employment – develop skills needed in the future and provide employment opportunities to those finding it hard to find work
- 4) Infrastructure – support for higher speed broadband, mobile coverage and other technological enhancements
- 5) Promoting the District offer – develop, strengthen and promote the visitor economy

**Table 1 – Strengths and weaknesses of the Horsham district economy**

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>• Low number of residents seeking unemployment benefits and a high proportion of economically active residents</li> <li>• Above average educational achievement</li> <li>• A high percentage of knowledge based businesses</li> <li>• A high rate of start-ups and good short and long term survival rates</li> <li>• Significant number of home and micro business</li> <li>• Increased demand of companies seeking to locate in the district</li> </ul>	<ul style="list-style-type: none"> <li>• High numbers of young adults who move away from the district to attend college and do not return</li> <li>• Workers living and working in the district have lower average incomes than those who live in the district but work outside the boundary</li> <li>• 69% of commercial space was built before 1980</li> <li>• Lack of employment land</li> <li>• Poor broadband speeds</li> </ul>
Opportunities	Threats
<ul style="list-style-type: none"> <li>• A high concentration of professional, scientific and technical businesses</li> <li>• A desirable location</li> <li>• First class schools with high levels of attainment</li> <li>• New strategic sites providing employment floorspace</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of existing businesses due to shortage of/outdated accommodation</li> <li>• Failure to secure inward investment and generate new business rates</li> <li>• Decline in the number of start-up businesses</li> <li>• Loss of office space to residential</li> <li>• Growth of out-commuting to higher paid jobs elsewhere</li> </ul>

## EXISTING POLICY CONTEXT

### NPPF

- 2.8 A key aim of the National Planning Policy Framework (NPPF) is the delivery of sustainable economic growth, and a number of more detailed requirements are set out in paragraph 21 and 22 in particular. It requires that local plans provide a clear economic vision and strategy which ensures that anticipated business needs are met for existing and emerging business sectors and that the policies are flexible enough to respond to changes in economic circumstances. The NPPF also states that key areas for economic regeneration, infrastructure provision and environmental enhancement

should also be identified and that allocations should be reviewed to ensure that the prospects of such sites being used for employment purposes remain.

### **Horsham District Planning Framework**

- 2.9 The overall locational strategy for development, including employment proposals, is set out in **policies 2, 3 and 4** of the Horsham District Planning Framework. These seek to direct most development to the key settlements of Horsham, Southwater and Billingshurst which have the greatest range of services and facilities and are therefore considered to be the most sustainable locations for growth. In the first instance it is expected that development should be concentrated within existing defined built-up area boundaries. Where sites are identified outside built-up areas it is envisaged that they should join settlement edges, and be allocated in a Local or Neighbourhood Plan.
- 2.10 The evidence which supported the preparation of the HDPF identified a shortfall of employment floorspace to meet the future needs in the district over the plan period. **Policy 7** of the HDPF therefore allocates land for a business park to the north of Horsham and also identifies a number of 'Key Employment Areas' which would be expected to be retained for employment uses. The policy also supports redevelopment, regeneration, intensification and smart-growth of existing sites and is supportive of home working and home based businesses; as well as tourism. The policy also commits to identifying additional land for employment development.
- 2.11 In addition to **Policy 7**, **Policy 9** (Employment Development) and **Policy 10** (Rural Economic Development) provide further support to the overall employment strategy. Policy 9 seeks to prevent the overall loss of employment land, but also enables sites which are no longer economically viable to be considered for other uses. Policy 10 seeks to support the rural economy. Growth of rural enterprises and other countryside bases are supported where the proposal is appropriate to the countryside location and meets a number of criteria.
- 2.12 It is considered that these policies should be reviewed to ensure that the most appropriate land is retained for employment development and that if necessary new land is brought forward to meet future business needs in the District.

### **EVIDENCE BASE REVIEW**

#### **Horsham District Employment Growth Assessment 2015**

- 2.13 Although it is recognised that the evidence which sets out the need for future employment land in the period to 2036 will need to be updated to take account of updated housing figures (once these are known); the starting point for the review of the HDPF employment policies was the 'Northern West Sussex Economic Growth Assessment (EGA)'. This was prepared by Nathaniel Lichfield & Partners on behalf of Horsham District Council, Crawley Borough Council and Mid Sussex District Council and was most recently updated in April 2015.

- 2.14 Overall, the EGA found that there was steady demand for business space, particularly from small firms requiring premises of 5-6,000 sqft and under. Occupancy rates on existing employment sites were found to be high with a shortage of industrial space reported across all types and sizes. A lack of surplus space industrial land which would enable market 'churn' (a natural turnover of business premises) was also identified. Since the publication of this report evidence of this problem remains through direct contact by businesses to the Council about this issue.
- 2.15 The types of businesses which have been reported by local agents as needing room for expansion are specialist/high end manufacturing companies who now require larger and more modern accommodation. Existing employment stock in the district is often old and of low to moderate quality which does not often suit modern business requirements. Businesses are now increasingly seeking high quality environments with ample space, landscaping and good levels of parking and accessibility. This trend has continued and Employment Floorspace Review undertaken in 2016 concluded that there is a limited supply of space in both the office and industrial / warehouse sector compared with past years.
- 2.16 In terms of office space, Horsham town centre was successful in attracting significant large scale office development through the late 1980s and early 1990s. However the EGA report found that many of the larger occupiers have progressively scaled back their presence in the town centre, with modern businesses often requiring less space, leaving behind functionally obsolete office accommodation and an oversupply of office space as a whole. The change in permitted development rights which enable the conversion of offices to residential use has also resulted in the conversion of a number of former offices in the town centre to residential use. The EGA reported that business occupiers are increasingly seeking high quality office premises and environments with good levels of parking and accessibility which the District must continue to provide if it wishes to capture future growth and ensure that the mix of residential and employment activity remains.
- 2.17 Table 2 below sets out the amount of employment land that was considered necessary to support an additional 750 homes per year. This was the level of growth proposed at the time the study was undertaken.

**Table 2 – Future Employment space requirements 2011-2031**

<b>Use</b>	<b>Baseline</b>	<b>750 homes per annum</b>
Office (B1a / B1b)	9.0	8.8 Ha
Industrial (B1c / B2 / B8)	27.3	29.3 Ha
<b>Total</b>	<b>36.3</b>	<b>38.1 Ha</b>

- 2.18 Following the examination of the HDPF, the Inspector increased the number of homes to be delivered in the District to 800 homes per year. In addition the plan period will need to be rolled forward until 2036. The exact level of employment land that is required will need to be recalculated for this period, and take into account additional levels of other development that may be required in this time frame. Although exact

figures are not yet available it is considered that it would not be unreasonable to plan for a **minimum** of 47 ha in the period to 2036.

- 2.19 The Employment Growth Assessment recognised that some of the total land needed for employment growth in the plan period 2011 to 2031 had already come forward, or been identified, for example through existing allocations, vacant sites, or other sites with planning permission for employment development. In 2015 this was calculated to be 14.8 ha. (Source: Table 8.4, EGA 2012). Subtracting this from the total requirement of 38.1 ha of employment land as set out in table 2 above, this leads to a revised baseline figure of 23.3ha of new employment land, which would rise to 32.2ha using the updated minimum figure of 47ha.
- 2.20 The Horsham District Planning Framework already allocates 4.6 ha land for a high quality business park at Land North of Horsham. This reduces the total additional land required for development in the period to 2031 to around 18.7ha, rising to at least 27.6 ha using the updated minimum requirement of 47ha. This use will need to be split between a mix of B1 and B8 uses. Again, further work will be required to identify the level of each type of use that will be required. Based on current figures it is likely that 20 - 25% of the new space will need to be B1 uses and the remainder B8.

#### **Planning Application Monitoring**

- 2.21 West Sussex County Council (WSSCC) provides comprehensive data on land which has been developed for employment uses each year. This is set out in more detail in the Council's Authority Monitoring Report (AMR) each year. Data in the monitoring report includes the floorspace which has been delivered (in square metres). This is not directly equivalent to number of hectares of employment land which is required, but this information does help provide a picture of the type and nature of employment land which has come forward since the HDPF was adopted.
- 2.22 Overall the delivery of employment floorspace has increased since 2012, with 19,352 square metres (gross) of employment space delivered in 2016/17. This compares with 6,470 square metres (gross) in 2015/16. The increase may reflect the improved economic situation from 2011/ 2012, shortly after the recession. It may also be indicative for the demand for employment growth which has been identified and the desirable nature of Horsham District as a place to do business. A majority of new employment has come forward on previously developed land since the beginning of the plan period. This suggests that development is being focussed in existing built-up areas and / or there has been some potential to expand and upgrade existing facilities.
- 2.23 The Authority Monitoring Report also identifies the type of business floor space which has been delivered in recent years. Whilst more floorspace has been delivered for storage and distribution (B8) and general industrial (B2) uses, there has been a net loss of office floorspace (B1). A number of sites within the Council's Housing Trajectory, namely Bishops Weald House, the former Council Offices, Norfolk House, Linden House and 4 Brighton Road were formerly offices that have been, or have approval to be converted to residential dwellings under the new permitted development rights; amounting to a total of 234 dwellings. This indicates that the market for housing

is currently much stronger than that for office uses particularly within Horsham town centre.

### **Status of existing employment sites**

- 2.24 Policy 9 of the HDPF seeks to prevent the loss of employment land and has identified Key Employment Areas where possible. The policy requires that proposals for redevelopment of these sites should follow a sequential test which requires that sites be redeveloped for a different employment use in the first instance, followed by mixed use schemes, and lastly for non-employment uses.
- 2.25 As has already been indicated earlier in this chapter, paragraph 22 of the NPPF states that *'planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. A review of the existing Key Employment Areas (KEAs) has therefore been undertaken to ensure that they remain fit for purpose.*
- 2.26 In addition to reviewing existing Key employment areas, other existing employment land which is not protected for this purpose to identify whether any additional sites may benefit from further protection as a Key Employment Area. Sites were identified through a range of methods, including searches of employment land databases, planning applications, and other databases such as the Council's SHELAA. It was considered whether sites were strategic in nature, (i.e. providing employment serving the district / the wider Gatwick Diamond area), the size of the site, the nature and quality of the employment development on the site employment sites. Recent planning history was also considered along with other sustainability considerations such as transport access, and the distance to other services and facilities, or other settlements
- 2.27 The full results of the review of Key Employment Areas is set out in **Appendix 1** with further detail on the proposed changes to the KEAs set out in **paras 2.35-2.36 and Table 4** below. Overall, it was found that although a small amount of land in Key Employment Areas has been lost to other uses, most KEAs have however remained in employment use and continue to perform an important role in providing land for employment in the District.
- 2.28 The review of the status of the KEAs has found that some sites have some potential for further intensification, but others are more constrained. The accessibility of some KEAs to modern large vehicles is limited, and it may be necessary to consider how this issue could be resolved in the future. The review of sites found that there are other sites in Horsham District that are meeting strategic level employment need may come under pressure for conversion to other uses in the future.

## Availability of Land for New Employment Development

- 2.29 The final element of the evidence base that has been reviewed is the amount of land that may potentially be available for employment development within the next 15 years. This was undertaken through a review of the Strategic Housing and Employment Land Availability Assessment, focussing on the employment land element of this study only at this stage.
- 2.30 Over recent years, sites have been proposed to the Council as land which may be suitable of accommodating land for employment development. Other sites have been identified by local communities through the preparation of their Neighbourhood Development Plans. Finally the Council has also considered whether there may be other areas of land that are in the District which may be available for employment development. A full assessment of the potential economic land availability of these areas of land has been undertaken, providing an assessment as to the **suitability**, **availability** and **achievability** of these sites for employment development in the next 15 years in accordance with government guidance. The results of this assessment are published as an update to the SHELAA [<insert web link>](#). The total land which is available for employment use is set out in table three.
- 2.31 It should be noted that this particular SHELAA assessment has focussed solely on land which has been proposed or identified as being suitable for employment led development, unless the site is already permitted / allocated in the Horsham District Planning Framework. It is however recognised that there are other sites in the SHELAA which have been proposed for larger mixed-use developments which would be residential led should they come forward. These sites will therefore be considered in more detail in later stages of the local plan review process. The total amount of land which is available for employment development may therefore be higher than is indicated below.

**Table 3: Summary of land available for employment development**

<b>Time Period</b>	<b>Total Land available (ha)</b>
1-5 years	14.5 *
6-10 years	29.0
11+ years	37.2
<b>Total</b>	<b>85.3</b>

\*It should be noted that the SHELAA assessment identifies a total of 31ha of land which is available for development in next first five years. However this includes land which is already allocated or has permission for employment development, and is therefore not able to be identified for any future growth.

## **PROPOSED EMPLOYMENT STRATEGY**

- 2.32 Although the evidence base will need to be updated later on in the local plan review process to take account of other factors, such as the national focus to increase the delivery of housing, it is clear from the evidence base that the new Local Plan will need to continue to contain policies which seek help to protect existing businesses and enable them to grow, either in their current location, or on new sites.
- 2.33 The evidence base also indicates that existing employment land is sometimes of poor quality, or is more difficult to access as a result of the increased size of delivery and haulage vehicles. The continued presence of employment sites within settlements demonstrates that towns and villages still have a role to play in providing local employment, close to where people live. The high land values do however result in pressure for conversion to other uses, particularly on employment sites which have not been modernised or where businesses have restructured. There is a need to ensure that where new business sites are provided, that they meet the needs of businesses in terms of their location and design. The proposed strategy for economic development is set out in the box below.
- 2.34 Many aspects of this suggested strategy continue a number of existing principles set out in the HDPF where they have been found to be working well. It is however recognised that following the review of Key Employment Areas, amendments are required to the existing boundaries of some sites, and a number of new sites are being proposed. Further detail on these proposed Key Employment Areas and new allocations are set out in the following paragraphs.

### **Proposed Local Plan strategy for economic development**

- Continue to support the provision of a high quality business park at land to the north of Horsham
- To continue to support redevelopment, regeneration and intensification and smart growth of existing employment sites
- To support the formation of small, start-up and move on businesses as well as home based businesses by encouraging the provision of small units through development proposals
- Ensuring that appropriate workspace infrastructure, including high speed broadband can be provided as an integral part of development.
- Residential developments should be able to support flexible working and home working as well as small businesses which have the flexibility to operate anywhere.
- Retention of identified 'Key Employment Areas' for employment use
- Providing support to businesses in rural parts of the district and promotion of the tourism economy in both the urban and rural parts of the District
- Identifying and allocating additional employment areas to meet the identified need for employment growth and inward investment in the District.
- Supporting smaller scale employment growth identified in Neighbourhood Development Plans

## KEY EMPLOYMENT AREAS

- 2.35 Following the review of existing Key Employment Areas (KEAs), and other existing employment sites, a number of changes are proposed to this designation. The full results of the assessment are set out in **Appendix 1** together with maps of the proposed amendments, existing KEAs and new KEAs where these have been proposed. If these sites are taken forward following consultation, the new and updated boundaries will be shown on the proposals map in due course. A summary of the proposals is shown in Table 4 below.
- 2.36 At the current time, all current Key Employment Areas are within existing built-up areas, as these sites are more at risk from pressures for conversion to other uses, given the high land values. There are sites that play a strategic role in providing employment land within the District which are located further away from existing settlements but are on the strategic road network. It is considered that some of these sites would benefit from an additional layer of protection. Such designation will help provide support to the business community and may provide certainty to enable investment and growth in these areas, particularly if they are close to existing settlements where wider long term growth of the settlements is being considered. Such protection will also assist in the retention of employment over conversion to other uses other than housing which may be more acceptable in rural areas.

**Table 4: Key Employment Area review results**

Site Name	Existing KEA?	Site description	Initial Recommendation
Huffwood & Eagle Trading Estates, Brookers Road, Billingshurst	Huffwood is an existing KEA, but the Eagle site is not	<p>Cumulatively totalling 0.9ha in size, both these sites are located close to the East of Billingshurst. The site is close to Billingshurst railway station and local shops, enabling access from a wider area and proximity to shops for employees. Both date back to the 1970s and comprise a mix of B1, B2 and B8 uses over both sites.</p> <p>Huffwood Trading Estate is an ageing industrial estate dating back to the 1970s. At the time of the visit the estate was fully occupied mostly by small industrial (B2) businesses with some storage (B8) use. Access to the site can be difficult for larger vehicles. Land at the Eagle has been proposed for residential development in the past, but this has been refused.</p>	<p>Cumulatively these sites provide a significant level of employment. It is therefore proposed that the Key Employment Area designation for Huffwood is <b>retained</b>, and <b>amended</b> to include the neighbouring Eagle Estate (SA030) within the KEA boundary.</p> <p>Given the reported access difficulties, a potential option for the longer term may be to consider the feasibility of relocating existing businesses to a new or existing employment site elsewhere within the Billingshurst area as part of the wider local plan or neighbourhood planning process.</p>
Daux Road Industrial Estate, Billingshurst	Yes	<p>A 3.6ha commercial estate with a range of 1960-2000s mixed quality buildings. At the time of the visit the estate was almost fully occupied mostly by small industrial (B2) businesses with some storage (B8) and office (B1) use with one unit vacant. The site is located on the eastern edge of the BUAB of Billingshurst enabling access from a wider area and proximity to shops for employees.</p> <p>0.3ha of land has within the KEA boundary has been converted to residential land following (DC/10/1912).</p>	<p><b>Retain</b> Daux Road Industrial Estate as an existing KEA in the HDPF (Local Plan) Review but <b>Amend</b> the boundary removing the land lost to housing DC/10/1912.</p>
Gillmans Industrial Estate, Natts Lane, Billingshurst	Yes	<p>Gilman's Industrial Estate is a 3.3ha well-ordered estate dating to the 1980-90s. The site is well used, and whilst there is not potential to expand the site existing uses within the estate may have some potential for expansion. None of the site has been lost to other uses in recent years.</p>	<p>Retain as a KEA with no change to current boundaries</p>

Site Name	Existing KEA?	Site description	Initial Recommendation
		<p>The site is located within the BUAB of Billingshurst enabling access from a wider area and proximity to shops for employees.</p>	
<p>Lawson Hunt Industrial Park, Broadbridge Heath</p>	<p>Yes</p>	<p>This 2.8ha site was developed in the 1980s. It is fully occupied, with the exception of one unit. The site has limited capacity for expansion within and beyond the site, and access issues for large modern HGVs have been reported.</p> <p>The site is located on the western edge of Broadbridge Heath. It adjoins the A281 so is accessible by car. There are some local facilities within the village including a convenience shop on Billingshurst Road, which is within walking distance of the site.</p>	<p>Retain as a KEA with no change to current boundaries</p>
<p>Mackley Industrial Estate, Small Dole</p>	<p>Yes</p>	<p>This is an 8.5ha site located in the south of the District, on the southern edge of Small Dole. It is a large mixed estate dating from the 1970s consisting of small units and local businesses, modern warehouses, and older offices of low to moderate quality. The site is well used and provides a significant employment offer within the southern part of Horsham District.</p> <p>The site is accessed from the A2037, and there a small local shops close within walking distance of the site which have the potential to be used by local employees on the site.</p> <p>The site is bounded by ancient woodland which is also designated for its nature conservation importance. The boundary of the South Downs National Park is within 50m of the site. These constraints limit the prospect of the site for expansion.</p>	<p>Retain as a KEA with no change to current boundaries</p>

Site Name	Existing KEA?	Site description	Initial Recommendation
Blatchford Road, Horsham	Yes	<p>Blatchford Road 7.3ha site located north east of Horsham town centre, primarily occupied by engineering companies and related businesses. There are also some warehouse/distribution units. Two former office units within the site have been lost to leisure uses (gym, dance school), but the site is fully occupied with no room for expansion.</p> <p>A lack of car parking spaces on the site has been identified but the site is within a town centre location with two railway stations just over 1km away, and public transport services within Horsham are reasonable.</p> <p>The town centre location limits the scope for expansion of this site.</p>	<p>Retain as a KEA with no change to current boundaries. Sites which have been converted to leisure uses are dotted within the site and removing them would not create a logical boundary.</p> <p>Given the need for business growth it is considered the site should be protected from further change to other uses and retain the potential for premises to be returned to business use in the future.</p>
Foundry Lane, Horsham	Yes	<p>Foundry Lane is a 9.7ha area of moderate quality buildings which are a mix of primarily B8 uses dating from the 1980s to 2000s. Fully occupied apart from one building. There is some space within the site for the further intensification of employment uses.</p> <p>Horsham Gates, the former offices blocks at the southern end of the KEA, have now been converted to residential use.</p> <p>The site is within a town centre location with Horsham station under 400m from the site entrance, and just over 1/2km from the town centre. There are also reasonable public transport services in this area.</p>	<p><b>Retain</b> Foundry Lane as a KEA but <b>amend</b> the red line boundary to exclude the new Horsham Gates residential development.</p>
Nightingale Road, Horsham	Yes	<p>Nightingale Road is 2.7ha site located close to the town centre of Horsham. The site is old and is dominated by low quality buildings next to the railhead. Most of the properties are used for warehouse / distribution, though there is some light industry and a single 1960s empty office block. There are some vacant units following the relocation of local businesses to larger facilities.</p>	<p><b>Retain</b> as a KEA with no change to current boundaries</p>

Site Name	Existing KEA?	Site description	Initial Recommendation
		<p>There are access issues for large modern HGVs via North Street, but the site is very close to Horsham Station (less than 200m to the site entrance), town centre and there are also reasonable bus services in this area.</p>	
<p>Station Approach, Pulborough</p>	<p>Yes</p>	<p>Station Approach is a 1980s-90s business park, measuring 1.5 ha and occupied by a merchant's warehouse and plant machinery buildings, corrugated sheds and brick warehousing. It is well screened by trees, fully occupied, with no room for internal expansion.</p> <p>The site shares an access with Pulborough Railway station. Although the site is close to public transport this has led to some difficulties with larger vehicles accessing the site. The estate is over 1km away from local shops which may mean employees are reliant on the car to reach local facilities during lunch breaks.</p>	<p><b>Retain</b> as a KEA with no change to current boundaries</p>
<p>Oakhurst Business Park, Wilberforce Way, Southwater</p>	<p>Yes</p>	<p>Oakhurst Business Park, measuring 11.0ha, is a modern 2000s business park with high quality buildings and landscaping. It is fully occupied. Given the size of site there may be room for intensification of use of the vacant allocated land within the Business Park but the impact on neighbouring residential properties would need to be a key consideration in this respect.</p> <p>The site is located 750 metres from the A24 Hop Oast Junction. Although there is no railway close by, there is reasonable access to Southwater by bus. Local facilities outside the KEA are located in Lintot Square to the south. This is unlikely to be accessed on foot.</p> <p>The Existing KEA adjoins the RSPCA offices, which has a direct relationship with the remainder of the site.</p>	<p><b>Retain</b> the site as a KEA but <b>amend</b> the boundary to include the land occupied by the RSPCA.</p>

Site Name	Existing KEA?	Site description	Initial Recommendation
Water Lane Trading Estate, Storrington	Yes	<p>The existing KEA in this location is 7.0 ha in size. The site dates to the 1970s estate, consisting of brick and corrugated roof buildings mostly occupied by small engineering firms and warehouse/distribution businesses. More modern buildings are present in the northern section of the site. The former Paula Rosa premises occupied 50% of the site but this area was granted planning permission for housing development in December 2016 (DC/15/2788), and development has now commenced on this portion of the site.</p> <p>Although this section of the site has been lost to other uses, the area still remains attractive to business as a location for growth, as TESLA Engineering recently moved into new buildings on the other side of the road.</p> <p>The site is located on the northern edge of Storrington and is therefore nearly 2km from the village centre which may generate some car journeys to the village centre during lunch breaks.</p>	<p><b>Retain</b> the site as a KEA but <b>amend</b> the boundary to include the land to the north of Water Lane to include land occupied by TESLA engineering.</p>
Huffwood Trading Estate, and Star Road Partridge Green	Yes	<p>Huffwood and Star Road Trading Estates are two separate but adjoin key employment areas located in Partridge Green. The Huffwood Estate is 0.9ha in size, and the Star Road site is 3.3ha. The total area is 4.2ha. The sites have separate road access but there is a pedestrian link between the two sites.</p> <p>Both sites are similar in age with buildings ranging in age from the 1960s onwards of primarily B2 and B8 uses. Units on the Huffwood site are generally smaller, those on the Star site are larger in scale. The Star site has also recently expanded with the provision of more modern units, which demonstrate that the area is performing well and is providing significant employment for the central part of the district.</p> <p>Neither site is accessed from A roads, but the road network is reasonable. Access to the Huffwood site is from the High Street in the village and can be difficult to access by larger vehicles.</p>	<p>Retain both the Huffwood and Star Road designations, but as they adjoin each other <b>amend</b> and merge as a single designation.</p> <p>A potential option for the longer term may be to consider the feasibility of relocating existing businesses to a new or existing employment site elsewhere around Partridge Green, potentially through the neighbourhood planning process. This would however require agreement from landowners.</p>

Site Name	Existing KEA?	Site description	Initial Recommendation
		Public transport to the village is more limited, but both sites are close to the centre of Partridge Green for local shops.	
Wiston Business Park, London Road, Ashington	No	<p>Wiston Business Park is situated on the Northbound A24 and comprises four early 2000s factory units. Units 1-3 are occupied by CSM Bakery Solutions. Unit 4 is occupied by Spheric Trafalgar. Many employees commute to this site from surrounding district's indicating the site has a strategic employment role.</p> <p>Although outside the built-up area boundary, the site does adjoin some rural residential dwellings and a garden centre. The site is directly accessible (northbound) to the A24 with clear links to the strategic road network.</p>	Given the strategic nature of the existing businesses on this site, coupled with direct access to the strategic road network it is considered that the site would benefit from <b>designation</b> as a Key Employment Area.
Henfield Business Park, Shoreham Road, Henfield	No	<p>Henfield Business Park is a thriving industrial estate located 2km the south of Henfield. The site is fully occupied and has recently expanded to accommodate additional B1, B2 and B8 uses, indicating that the site is performing well and it provides additional employment opportunities in the south of the District.</p> <p>The site is accessed from the A2037. The location of the site away from any existing BUAB does however mean that there will be some reliance on the private car.</p>	Given the high performance of this site, together with the direct access to the strategic road network in the district, it is considered that the site would benefit from <b>designation</b> as a Key Employment Area.
Graylands Estate, Langhurstwood Road, Horsham	No	<p>Graylands Estate is situated to the north of Horsham. It is currently located outside the BUAB, but directly adjoins the HDPF allocation at land north of Horsham for at least 2,500 homes. Applications for the conversion of some buildings in this area to residential development. This may increase the pressure in the longer term, given the strategic housing proposed to the south. It should be noted that the site will not adjoin built development.</p> <p>The site is elevated but is well screened, and It has a dedicated car park and an on-site café. The buildings are all recently refurbished. The estate particularly appeals to the micro</p>	This site provides important employment land for smaller start-up businesses. It is however recognised that the site is close to an area allocated for strategic housing development, and has already come under pressure for conversion to other uses. To ensure the continued balance of employment and residential development in the wider district it is considered that the existing employment land should be <b>designated</b> as a KEA.

Site Name	Existing KEA?	Site description	Initial Recommendation
		<p>enterprise business sector and small and medium sized enterprises (SMEs).</p> <p>Although the site does not directly adjoin the strategic road networks, there are good links and on-site facilities for staff. The context of the wider area will change in the future as the land to the north of Horsham is built out.</p>	
<p>North Heath Lane Industrial Estate, North Heath Lane, Horsham</p>	<p>No</p>	<p>This 1.8ha business park is located within the existing built-up area of Horsham containing a mix of B1, B2 and B8 uses. The site is performing well with one unit vacant at the time of the site assessment. There is no space for expansion but there is potential to intensify activities within the existing buildings.</p> <p>The site is surrounded by residential development, in an area with high residential land values which places the site at some risk of pressure for conversion to residential or other uses.</p> <p>The site is close to local shops and approximately 3km from the town centre. There is access from North Heath Lane via a wide driveway.</p>	<p><b>Designate</b> as a KEA</p>
<p>Parsonage Business Park, Parsonage Way, Horsham</p>	<p>No</p>	<p>This is a 1.2 ha site which is 1980s/90s industrial business park comprising two storey moderate quality buildings for light industrial (B2) and warehouse/distribution (B8) use. It is performing well with only one vacant unit.</p> <p>The site is 700m by foot from the garage/supermarket at Redkilm Way / Old Crawley Road roundabout. It is 1.3km by car from Horsham Railway Station and 2km from the services and facilities provided in Horsham town centre.</p> <p>Horsham is an area with high residential land values which places the site at some risk of pressure for conversion to residential or other uses.</p>	<p><b>Designate</b> as a KEA</p>

Site Name	Existing KEA?	Site description	Initial Recommendation
Spring Copse Business Park, Slinfold	No	<p>The site is 2.8ha. It was developed in the 1990s and is fully occupied by a mix of B2 and B8 uses. It is relatively close to the Maydwell Business Park to the south east.</p> <p>The site is relatively close (1.5km) to Slinfold and directly adjoins the strategic road network on the A29 with good access for larger vehicles. There would however be reliance on the private vehicle to access the site.</p>	Given the high performance of this site, together with the direct access to the strategic road network in the district, it is considered that the site would benefit from <b>designation</b> as a Key Employment Area.
Maydwell Business Park, Maydwell, Slinfold	No	<p>This 5.1ha site is located west of Slinfold and directly adjoins the existing settlement boundary. The site is a large modern estate, comprising mostly high quality "prestige" office and logistics buildings with some lower quality warehouse/distribution units at the eastern end. The site is fully occupied.</p> <p>Access to the site by vehicle is by the A29, but there is pedestrian access from Slinfold. The site is just less than 1km on foot to Slinfold village centre although driving distances are significantly longer.</p>	Given the high performance of this site, together with the direct access to the strategic road network in the district, it is considered that the site would benefit from <b>designation</b> as a Key Employment Area.
Southwater Business Park, Worthing Road, Southwater	No	<p>Southwater Business Park is a 5.6ha site located in the southern part of Southwater and is within the existing built-up area boundary. There is a substantial landscape buffer at the edge of the site but there is a vacant car park area that could be developed for employment uses. The site has been found to be performing well.</p> <p>The site has good access and is close to the A24 which adjoins the eastern boundary of Southwater. Lintot Square is directly to the north of the site and at its furthest point is 650m from this centre.</p>	Southwater is undergoing significant expansion at the current time and there is a need to ensure that employment opportunities are provided for new residents as well as those living in the wider Gatwick Diamond area. It is considered that this site should be <b>designated</b> as a Key Employment Area.
Rock Business Park, The Hollow, Washington	No	Rock Business Park is a brand new purpose-built estate off the southbound A24 following the redevelopment of existing development on the site. The site provides modern B1 and B8 buildings. Phase 1 is built out and is fully occupied; Phase 2 is also built out and occupied apart from a 9375 sq ft B8 unit.	Given the high performance of this site, together with the direct access to the strategic road network in the district, it is considered that the site would benefit from <b>designation</b> as a key employment area.

Site Name	Existing KEA?	Site description	Initial Recommendation
		The site is directly accessible to the southbound carriageway of the A24. The road can also be accessed via a small road linking both the A24 and A283.	

DRAFT

## SITES PUT FORWARD FOR CONSIDERATION FOR COMMERCIAL USE

- 2.37 It is clear that additional land is required for the provision of employment in order to meet the needs of both existing and future business in the District and to support the economy of the wider sub-region. Through the initial SHELAA assessment, a number of sites have been identified as having some potential for employment development in the future. Further detail on these sites is set out in [Appendix 1](#) and a summary is provided in Table 5 below.
- 2.38 It is emphasised that the sites set out in this document are for **consultation purposes only and do not form council policy**. The total land available for employment growth exceeds the total that is likely to be required, and this consultation is therefore a starting point in considering the potential of these sites. This will need to be tested through the full sustainability appraisal process, habitat regulations assessment and the cumulative impact will need to be considered with other development proposals within and beyond the district.
- 2.39 Some of the sites which have been identified as having some potential for employment development are not located within or adjoining existing settlements, but are instead located on the strategic road network. Allocating these sites will therefore require considering whether it is appropriate to have such a locational strategy for employment development in the future and the proximity of such sites to existing settlements or employment development will need to be a factor in this consideration. Again it will be necessary to test the implications of this fully through a sustainability appraisal and other evidence base updates. This would however offer a potential solution to enabling more sites that are accessible to modern delivery vehicles, which has been identified as an issue on some existing sites. This consultation also provides an opportunity to understand your views on such a change.

Table 5 – Sites put forward for consideration for commercial use

Site Name	Site description & initial assessment of potential for development
Land at Lower Broadbridge Farm, Broadbridge Heath	<p>This is a greenfield site consisting of agricultural fields west of Lawson Hunt Industrial Park, Broadbridge Heath. The total size of the site submitted to the SHELAA is 12ha, however only the 3.7ha is considered to be suitable for employment use as the landscape is increasingly sensitive to the west. The site adjoins the existing BUAB of Broadbridge Heath and is opposite an existing area of employment development.</p> <p>The site is located on the A281 and therefore has good access to the strategic road network. The site is 1.5km to the nearest large supermarket in the Wickhurst Lane retail area on the eastern edge of the settlement, but there is a small shop on the Billingshurst Road which is closer to this site. Reliance on private vehicles would therefore be high unless catering facilities were made available on-site.</p> <p>It is considered that the 3.7ha parcel of land adjoining the BUAB of Broadbridge heath may have potential for economic development. The site is accessible to the road network and is already close to existing employment land. This would help enable any businesses to expand into more modern units in the current area should they choose to do so. It is considered that the site would be suitable for B1, B2, B8 uses. It would however be necessary to undertake further work on the landscape sensitivity of this site, and if allocated it would be necessary to ensure that any impacts on the surrounding countryside is minimised.</p>
Nowhurst Business Park, Guildford Road, Broadbridge Heath	<p>The site is located 1.5km to the north west of the BUAB of Broadbridge Heath on the A281 Guildford Road. The total site area is 11.ha. It does not directly adjoin any settlement but there are some residential properties to the south east of the site, some of which are listed properties. There are active proposals for commercial use on this site (DC/17/2131) for B1, B2 and B8 uses. Resolution to permit this application has now been made, subject to a S106 agreement. Around 3km from the nearest services and facilities, development in this location which would increase reliance on the private car to access this site. The south western portion of the site is previously developed land, but the use has now ceased and remains of these uses are fairly limited. The rest of the site is greenfield.</p> <p>Some of this site has previously been used for commercial purposes in the past, and the site is accessible to the main strategic road network. The site is however not directly adjoining any settlement which would be likely to generate some additional car journeys to this location than currently exist.</p> <p>Given the need for employment development and the previous commercial use on this site, there is considered to be potential for allocating land on this site for employment development (B1, B2 and B8 uses). The overall extent of any allocation would however need to be considered to take account of the relatively rural surroundings and the sensitive nature of some of the surrounding buildings. The design and uses of any scheme would also need to be sensitively designed to take this into account.</p>
Land north of Hilland Farm, Billingshurst	<p>This site is located to the north of Billingshurst to the east of the A29. Land to the south of, but not directly adjoining this site has been granted permission for 475 homes. Other earlier applications have also led to</p>

Site Name	Site description & initial assessment of potential for development
	<p>housing development to the south of this site which has now been completed. Although currently in a rural location, the surroundings of the site will become more urbanised in the future. The site is around 600m to the services and facilities within the centre of Billingshurst. There is a station in the village but this is in the southern part of the settlement and is not within easy walking distance of this site.</p> <p>The site is relatively unconstrained but is located in predominantly open landscape and although there is some vegetation around this site but screening is very limited which would mean that development is likely to be visible within the landscape unless this can be mitigated. The perception of any settlement coalescence between Billingshurst and Five Oaks to the north would also need to be considered.</p> <p>Given the proximity of this site to existing and future development to the east of Billingshurst, together with the direct access to the strategic road network, it is considered there may be some potential for future employment growth in this location. This would however need to be designed to ensure that landscape impacts in particular could be mitigated. Ecological surveys may be necessary to identify impacts on the flight paths of Barbastelle bats which are a protected species and have been recorded in the area.</p>
<p>Land West of Hilland Roundabout, Billingshurst</p>	<p>This site is located to the north of Billingshurst to the north and west of the A29. The Built up area of the settlement is south of (but not directly adjoining) the site, but there is no other development around the site, and is surrounded by agricultural land. The site around 600m to the services and facilities within the centre of Billingshurst. There is a station in the village but this is in the southern part of the settlement and is not within easy walking distance of this site.</p> <p>The site is relatively unconstrained but is located in predominantly open landscape particularly to the north and west although it is screened and although there is some vegetation around this site screening is very limited, which would mean that development is likely to be visible within the landscape unless this can be mitigated. The perception of any settlement coalescence between Billingshurst and Five Oaks to the north would also need to be considered.</p> <p>Given the proximity of this site to existing development, together with the direct access to the strategic road network, it is considered there may be some potential for future employment growth in this location. This would however need to be designed to ensure that landscape impacts in particular could be mitigated. Ecological surveys may be necessary to identify impacts on the flight paths of Barbastelle bats which are a protected species and have been recorded in the area.</p>
<p>Rosier Commercial Centre, Coneyhurst Road, Billingshurst</p>	<p>Rosier Commercial Centre is an industrial estate occupied by a range of mixed quality industrial buildings, with large areas of external; storage for buses, lorries, cars and other vehicles. There are empty spaces in between the existing buildings, and there may therefore be potential for intensification of employment uses within the existing developed area. The land promoted for commercial development extends beyond the existing built form on the site (but within the site ownership), and there is therefore potential for employment expansion.</p>

Site Name	Site description & initial assessment of potential for development
	<p>The industrial estate is bound by countryside to the north, east and west and by the Arun Valley Railway line to the south. Much of the land is being promoted by developers as a potential location for strategic housing development in the future, and there may therefore be legal agreements affecting the potential for development in and around this site.</p> <p>The site is connected to the wider strategic road network as it directly adjoins the A272. Whilst the site is only 500m east of the BUAB of Billingshurst as crow flies, it is 2kms away by car via the A272 from the shops and services within Billingshurst village centre as there is no direct pedestrian access.</p> <p>This site already has potential for expansion within the existing built form, but due to the direct access to the strategic road network and the relative proximity to Billingshurst it is considered there may be some potential for future employment growth in this location. Any development proposals in this location will need to take account of other landholdings and legal agreements that may exist on the surrounding land in this area. Ecological surveys may be necessary to identify impacts on the flight paths of Barbastelle bats which are a protected species and have been recorded in the area. Should the site not be allocated for expansion, the suitability of the site for designation as a KEA should be considered.</p>
Former Novartis site, Horsham	<p>The site is a former commercial site occupied by Novartis Pharmaceuticals. Novartis have now vacated the site and the buildings have been demolished with the exception of the locally listed 1930s Art Deco building. The site is bound by the railway line to the west and south and by Parsonage Road to the north. Land to the north of Parsonage Road which was previously owned by Novartis has now been redeveloped for housing.</p> <p>The site is located within the Horsham built-up area boundary and is 1.5km away from the town centre which has a range of services and facilities. Horsham also has a railway station and reasonable public transport services so has the potential to be accessed from a wide area.</p> <p>The HDPF allocated this site (<b>Policy 8</b>) for a mixed use development comprising education and complementary employment uses. The policy does however state that employment use for this site would be supported if the education facility does not come forward by 2021. The University of Sussex confirmed that this site would not be pursued for this use, and the site has been purchased by WSCC. The future of this site and the lack of any prospect for a university must be taken into account.</p> <p>The former Novartis site has a history of high level research and development employment use and the principle of employment use on this site is well established. The site is located in the main town of the district and would provide employment to support residents of the town and the wider Gatwick Diamond area. It is therefore considered that this site has significant potential for re-use for employment within the town. It will be necessary to ensure that any redevelopment retains the locally listed building and the existing protected trees.</p>

Site Name	Site description & initial assessment of potential for development
Broadlands Business campus, Langhurstwood Road, Horsham	<p>The 1.7 ha site is well-appointed containing two large very high quality "prestige" office buildings, Ashurst and Holmwood, in landscaped grounds that are screened from the surrounding landscape by woodland with. Ashurst has 1,105sq.m of space to let, Holmwood is fully occupied. The site is bound by a stream to the north, a Home Office site to the east, Langhurstwood Road to the south and the Fisher industrial site to the west. The principle of employment use in this location is therefore well established although it is outside of any built-up area boundary and access is reliant on private cars.</p> <p>The site does not adjoin the strategic road network directly as it is 3km of the A264. Some of the land to the north of Horsham has however been allocated for a residential led development in the Horsham District Planning Framework, and the proximity of this site to development will reduce in the future.</p> <p>It is considered that there is a small area of land east of the main access to this site which may have some capacity to accommodate additional employment development on this site which may help provide further employment development in an area where the urban context will change in the near future with the development of Land north of Horsham.</p>
Graylands Estate, Langhurst Wood Road, Horsham	<p>Graylands Estate is situated to the north of Horsham and is accessed by Langhurstwood Road which adjoins the A264 1.7km to the south. It is an existing site which is already identified as a potential KEA in this document. It is currently located outside the BUAB, but directly adjoins the HDPF allocation at land north of Horsham for at least 2,500 homes. Applications for the conversion of some buildings in this area to residential development have already been submitted and this may increase the pressure in the longer term, given the strategic housing proposed to the south. It should be noted that the site will not adjoin built development.</p> <p>The site is elevated but is well screened, and It has a dedicated car park and an on-site café. The buildings are all recently refurbished. The estate particularly appeals to the micro enterprise business sector and small and medium sized enterprises (SMEs). There is land to the east and west of the existing employment uses on this site which may have potential for further employment growth given that there is an existing use in this location and the wider urban context of the area will change in the future. The elevated nature of the site may have landscape impacts and this would need to be addressed if the site were to be allocated for further employment development.</p> <p>Although the site does not directly adjoin the strategic road networks, there are good links and on-site facilities for staff. The context of the wider area will change in the future as the land to the north of Horsham is built out.</p>
Land at Hilliers, Horsham	<p>The site is located in a countryside location just off the A281 to the east of Horsham. It is close to but outside the current built-up area boundary. There is a river and tree line which currently forms a firm boundary to the town. The site is currently greenfield and contains a number of tree and hedgerows.</p>

Site Name	Site description & initial assessment of potential for development
	<p>Access to this site by road would need to be taken through the access to Hillers Garden Centre site where there is direct access to the A281. This has other retail uses (such as a camping showroom) which create an urbanised pocket and some existing employment opportunities. There are some local facilities close by in the garden centre, and a Tesco Express. Although the town has two railway stations these are not close to the site and there would be some reliance on the car. There is however reasonable public transport in the town.</p> <p>It is considered that this site does have some relationship with existing built development but this is commercial in nature. There may therefore be some potential for employment growth in this location given the relative proximity to roads and the main town of Horsham. It would however be necessary to undertake further landscape and ecological studies given the greenfield and well treed nature of the site.</p>
<p>Land at Brinsbury College, Pulborough / West Chiltington</p>	<p>Brinsbury is a higher education campus owned and operated by Chichester College and West Sussex County Council. The site is located on the A29 and is roughly 3km away from both Billingshurst to the north and Pulborough to the south. The campus plays an important local and sub-regional role, providing further education and training in agricultural and land-based qualifications. This enables the campus to provide a curriculum that supports not only those in further education, but also the wider rural economy. The range of courses at the College also includes motor vehicle studies, agricultural engineering, business management and floristry as well as more traditional agricultural courses.</p> <p>The site is allocated in Policy AL15 of the Site Specific Allocations of Land Document as a centre for agricultural excellence. The “Brinsbury Centre of Rural Excellence” SPD which was adopted in 2009 sets out the Council’s guidelines and vision for potential future development to support the financial and educational viability of the campus. This policy framework has supported the development of land based and commercial businesses which support the educational provision at the college. Growth around the college has taken place as a result of this and is now home to Architectural Plants and Hepworths Brewery. More recently applications for commercial use have been submitted and recently permitted to allow for a car showroom on land on the eastern side of the A29. (DC/16/2963), together with a range of B1, B2 and B8 uses (DC/17/0177).</p> <p>Brinsbury Campus (Chichester College) falls within an Archaeological Notification Area. There are no Tree Preservation Orders affecting the site; however, there are several mature trees along the frontage(s) with Stane Street (the A29) and along the western boundary of the site. The surrounding area is generally characterised by open fields, the boundaries of which are defined by mature bands of trees, with occasional sporadic development. Development therefore has the potential to have an urbanising impact on a generally rural and open landscape. The site does however have direct access to the strategic road network. The rural location away from regular public transport will mean there is a high reliance on the private car.</p> <p>It is clear that this site is providing educational and other rural based employment opportunities which link with the college and already have good road access. The principle of some development which supports</p>

Site Name	Site description & initial assessment of potential for development
	<p>education or the rural economy is already supported in this location. Given the open nature of this landscape it is considered that an allocation in this location should identify a clear area in which future growth would be considered acceptable to minimise landscape harm, and any perceived coalescence between Pulborough and Billingshurst. There will be a need to support a wide range of businesses in the district in the future including those which support the rural economy in the District (Chapter 3 of this document provides some additional detail on this matter). It is therefore considered that any business growth in this location should be linked to the rural economy or the educational offer at this campus, to help support the future of this organisation.</p>
<p>Land at Broomers Hill Business Park, Pulborough</p>	<p>Broomers Hill Business Park is located on the A29, 0.5km north of the BUAB of Codmore Hill, Pulborough. Land at the northern end of the site is an existing business park which is performing well. It directly adjoins the strategic road network. The site is also relatively close to Codmore Hill and Pulborough, which has a railway station. The pedestrian access in this area is poor and it is likely that some reliance will be required on cars to reach this site or nearby facilities.</p> <p>There is an area of land to the south of this site and adjoining with the BUAB at Codmore Hill which is considered may be suitable for allocation as an area for employment development, which would enable the expansion of this site and support employment development within the southern part of Horsham District. It is recognised that this site has been identified locally and if allocated to provide local rather than strategic employment, may be a suitable site for inclusion in the emerging Pulborough Neighbourhood Plan.</p>
<p>Buckbarn Crossroads (north and south), Shipley</p>	<p>The site comprises two parcels of greenfield land, both at the junction of the A24 and the A272 and referred to locally as the Buckbarn Crossroads. The site is away from any settlement approximately 2.5km south of Southwater. Both sites are greenfield land.</p> <p>The site north of the A272 is bound by woodland to the north, the A24 to the east, the A272 to the south and pasture/grassland to the east. The site south of the A272 is bound by a petrol filling station and car wash to the north, the A24 to the east, agricultural land to the south and four residential units to the east.</p> <p>Although the sites are close to the A24 and the A272 there is no means of accessing these sites by anything other than private vehicles. The sites are also on an existing junction, and gaining access to the site may be difficult to achieve in terms of maintaining existing traffic movements and road safety. The cost of any solution could therefore impact the viability of any development coming forward in this location.</p>
<p>Land at Maydwell Avenue, Slinfold</p>	<p>This 6.3ha site is bound lies either side of the landscaped driveway into Maydwell Business Park at Slinfold which adjoins the site to the east. The site also adjoins a further area of employment land to the north - Spring Copse Business Park. The site is bound by woodland to the south and south east of the site. The west of the site adjoins the A29 to which provides direct access from the site to the strategic road network. Access by public transport is limited.</p> <p>The nearest settlement to this site is Slinfold to the east. The settlement cannot be accessed directly by car, but there is a pedestrian exit to Hayes Lane through the existing business park. It is however likely that</p>

Site Name	Site description & initial assessment of potential for development
	<p>most trips to the settlement would if needed be by car which is an approximately 2km journey.</p> <p>The site is well contained in the landscape and some of the woodland to the south is designated as ancient woodland – any development would need to take account of this. It is however considered that this area could be a suitable site for additional employment growth linking to existing employment which adjoins this area. This would however be dependent on the availability of this site for such a purpose being confirmed.</p>
Land West of Hop Oast, Southwater	<p>The site is currently agricultural land, bound woodland and hedgerows to the north and west. Hop Oast depot, petrol filling station and amenity tip and park and ride are located to the east. Tower Hill road adjoins the site to the west. The site also adjoins the A24 to the south. The site does not adjoin any existing settlement boundary but is 2.5km by road north to Horsham Town Centre and 2.8km by road south to Southwater Village Centre. Access to the site could potentially be made by public transport as the site adjoins a park and ride.</p> <p>Although close to the strategic road network, there is currently no direct access to the site and further work would be required to understand if this could be achieved. The site is also bisected by a high pressure gas main which can limit the amount of development which can take place in the easements along these pipelines. Any potential for development in this location would also be dependent on the availability of this site for such a purpose being confirmed.</p>
Land south of Star Road Industrial Estate, Partridge Green	<p>As has already been set out in this document, Huffwood and Star Road Trading Estates are two separate but adjoining employment areas located in Partridge Green. Both sites are similar in age with buildings ranging in age from the 1960s onwards of primarily B2 and B8 uses. Units on the Huffwood site are generally smaller, those on the Star site are larger in scale. The Star site has also recently expanded with the provision of more modern units, which demonstrate that the area is performing well and is providing significant employment for the central part of the district.</p> <p>Further land to the south of the Star Road Industrial Estate has been proposed as a potential location for employment development. The site consists of scrubby grassland. Ash Wood area of woodland abuts the site to the north east and the eastern and southern boundaries comprise agricultural land, with the exception of the far south eastern corner of the site which is a sewage treatment works.</p> <p>Although the site is not accessed from the strategic road network access to this site is reasonable, and could potentially be achieved through the existing industrial estate. Public transport to the village is limited, but is close to local facilities in Partridge Green for local shops.</p> <p>This site is considered to have potential for employment development including an expansion of the existing site. There may be some potential for consolidation or relocation of existing uses on the Star and Huffwood Estates, but there should be no net loss of land for employment as a result of any such proposals. The delivery of such a scheme would however require the agreement of both landowners. It may also be possible for such development to come forward through a</p>

Site Name	Site description & initial assessment of potential for development
	neighbourhood plan, should such a proposal be providing local scale rather than strategic employment development.

We would like to hear your views on the development of the employment policies as part of the review of the Horsham District Planning Framework. In particular it would be helpful to hear your views on:

- The proposed changes to the Key Employment Areas
- The potential for employment development on the sites identified in table five. Please let us know if you have other land which you would wish the Council to consider for employment development.
- Should the locational strategy for employment sites be relaxed to support the allocation of sites for employment growth where they are adjacent to the key strategic road network (A24, A29, A281, A264, A272) and the site can be contained within an existing defensible boundary and the landscape features can be maintained and enhanced

DRAFT

### 3.0 TOURISM

- 3.1 As has already been identified, Horsham District has an attractive character and is well connected to London and the south-east. As a consequence, tourism is a small but significant contributor to the overall economy of the District. The key offer is the attractive landscape, with links to the South Downs National Park and the presence of the High Weald AONB, historic towns and villages with independent shops, lively festivals and interesting gastronomy. Events and festivals are held regularly in Horsham town centre eg Piazza Italia at Easter and the Horsham the Food & Drink which runs throughout September. Links from these events have been established across the District as a whole.

#### **The Horsham District Visitor Economy Strategy**

- 3.2 The Horsham District Visitor Economy Strategy published in 2017 states that the sector accounts for 6.1% of all jobs in the district, but also brings in wider benefits through the contribution that visitors make during their visit. The Strategy identifies that there are opportunities to increase the benefits that the visitor economy can bring to the District. In particular, the strategy has identified there are significant opportunities to increase overnight visitors to the area, who generate higher levels of expenditure per trip than day visitors. This could include a number of untapped markets in both the UK and abroad.
- 3.3 The Visitor Economy Strategy has a number of key aims. These are set out in more detail in the Visitor Economy Strategy documentation but are summarised as follows:

#### **Summary of the Horsham District Visitor Economy Strategy**

- Horsham should act as the 'hub and host' for the visitor economy across the District
- Attracting longer staying visitors and increasing visitor spend across the District
- To be the base for a visit to our wider area
- To have close relationships with and promote our valued neighbours, in particular the South Downs National Park, the AONBs, our coastal towns and Gatwick airport
- To build up our accommodation offer to meet the needs of our target audience
- Work with and support our local businesses, particularly micro and small businesses and food and drink experiences and provide products and services that meet the needs of target audiences
- To make our events a focus for the whole district, attracting outside audiences
- To create trails to walk, cycle, ride or kayak, so guests can discover our wildlife, share our local stories and produce
- To celebrate and promote our geology, landscape, wildlife and the vernacular architecture, old estates and the family stories it has generated including sharing quirky less-known stories with our guests, encouraging them to take a second look
- To celebrate our crafts and skills; our arts and culture

## Horsham District Hotel and Visitor Accommodation Study 2016

- 3.4 In addition to the Strategy to build on the district's visitor economy, a more detailed study to provide an assessment of the future potential for hotel and visitor accommodation development across Horsham District, was undertaken and published in 2016. A particular focus of the study was to understanding the potential to secure new hotel provision in Horsham Town, but also considered the visitor economy in more rural areas of the district. The study found that the district is well placed to capitalise on the projected growth in the domestic short break and overseas tourist markets and the increasing demand for family and friend get-togethers, celebrations and weekends away; and there is potential for this provision to be met in both Horsham town and across the district as a whole.
- 3.5 Within Horsham town, the study found that there was potential for additional visitor accommodation including for 3 star hotel accommodation, with further potential for a boutique hotel. In addition to hotel accommodation, opportunities identified in Horsham town include:
- Scope for pubs in the town centre to offer guest accommodation, primarily through the use of upper floor space;
  - Potential for restaurants with rooms, again through the use of upper floors;
  - Opportunities for new B&Bs to open in the town to replace those that have closed;
- 3.6 In the rural parts of Horsham District the study shows potential for a range of accommodation types. The potential for more accommodation in settlements outside but close to the South Downs National Park was identified.
- The upgrading, development and expansion of existing hotels, including the development of leisure and spa facilities;
  - A further luxury or boutique country house hotel, given a suitable property for conversion and the potential for a luxury hotel provision on golf courses.
  - High quality pub accommodation, including more boutique inns and restaurants with rooms;
  - Accommodation at wedding venues;
  - The upgrading of B&Bs, including some potentially to a boutique standard as well as new B&Bs, including some luxury, 5 star and boutique to replace those that close as their owners retire;
  - High quality holiday cottages / lodges, in a range of sites and locations to accommodate different visitor interests
  - The expansion, improvement and development of existing touring caravan and camping sites
- 3.7 A further outcome of the study was the recognition that high land values, particularly for residential development, can lead to pressure for the conversion of this land to other uses. High land values can also impact on the viability of schemes with investors struggling to develop land at a cost that would make such developments more viable. A recommendation from the study also raised the potential for a hotel and visitor accommodation retention policy.

3.8 **Policy 11** (Tourism and Cultural Facilities) of the HDPF already provide a policy basis on which many of the aims of the district's visitor strategy and the outcomes of the economy can be delivered, for example setting out Horsham Town as the key centre for tourism growth. It is however considered that this policy could be updated to ensure that it fully reflects the visitor strategy and findings from the Hotel and Visitor Accommodation Study, and help grow the overnight accommodation provision across the District in order to actively support the wider district tourism strategy and ambitions.

3.9 It is therefore proposed that the tourism policy is updated as follows:

- To enable the district to develop as a centre for tourism in towns villages and the countryside.
- Enabling some flexibility towards developing visitor accommodation in the countryside, including providing more clarity on where in terms of an element of new-build accommodation development may be considered acceptable. This could potentially include sites that are well screened and landscaped; non-natural, already developed sites such as golf courses; sites where there are already established uses/ activities such as wedding venues, fishing lakes, equestrian centres, vineyards and other visitor attractions
- Identification of the circumstances where on-site staff accommodation for some rural visitor accommodation businesses would be acceptable.
- Continue to support appropriate forms of visitor accommodation in the southern half of the District that can service National Park-driven demand.
- Consider the provision of a hotel/visitor accommodation retention policy in the Horsham District Planning Framework. This could potentially require
  - Evidence of marketing for sale for the existing use for a minimum period of time, with a reputable specialist agent, at a realistic price that reflects the value of the business; or
  - Evidence of non-viability of the existing business, in terms of poor performance, lack of market demand, or extraordinary levels of cost, together with clear demonstration that the business has been well-managed and marketed and all reasonable efforts have been made to find a viable future for the business.
- Support the return of a historic property to active use

- 3.10 As part of the Council’s work on this document, Land at Toat Café, located north of Pulborough may have the potential to meet tourism facilities that support the local economy in this area, and could help to support wider tourism in the nearby South Downs National Park.

<p>Land at Toat Café, Pulborough</p>	<p>The site is in a countryside location 0.66km north of the BUAB of Codmore Hill. The site is previously developed in some places and has been used as a Café, Children’s Play Area, Hand Car Wash, overnight lorry park and car boot sales. The site has an unsightly and urban appearance which is at odds with the rural surroundings beyond the site which comprise a network of agricultural land and hedgerows.</p> <p>The site directly adjoins the A29 so has excellent access to the strategic road network, but access to the site is reliant on private vehicles as there is limited public transport in the area. It is however relatively small, and is located between Brinsbury and Broomers Hill which are more likely to provide a focus for employment investment as these are larger existing sites.</p> <p>It is however considered that this site may support other leisure based activities such as a hotel or rural tourism activity. This site may have potential as a wedding venue, weekend lodges or local gastronomy centre, which have been identified as strands in the Horsham District Visitor Economy Strategy.</p>
--------------------------------------	---

## **4.0 SUSTAINABLE RURAL DEVELOPMENT**

### **INTRODUCTION**

- 4.1 Although most of the population in Horsham District live and work in towns and villages in the District, the vast majority of the land area is countryside. This ranges in character, but is dominated by small to medium sized fields which are used as pasture or arable land, and in some areas for equestrian purposes. A network of hedgerows and woodlands separate these fields. The wooded areas are particularly apparent in the northern half of the district, and many have been designated as ancient woodland – such areas have been wooded for at least 400 years.
- 4.2 The rural environment does however provide a place of work or a place to live for an important section of our community. These include farmers, rural workers, plant nurseries, small commercial centres, tourism and leisure. Not only do many of these businesses contribute to the economy in their own right, but they also help protect the leafy character of the district and the important services that it offers (such as flood attenuation and carbon storage). This also supports the economy of the rest of the District and help to make it an attractive place to live and work.
- 4.3 It is therefore important to ensure that those who live and work in the countryside are able to do so, and that the economy and rural communities can continue to thrive. This chapter therefore considers how this may balance can be achieved.

### **EXISTING POLICY CONTEXT**

#### **NPPF**

- 4.4 The National Planning Policy Framework recognises the need for planning policies to enable economic growth which creates jobs and prosperity in rural areas. The NPPF states in paragraph 28 that Local and neighbourhood plans should
- support sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;
  - promote the development and diversification of agricultural and other land-based rural businesses;
  - support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside and
  - promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

## Horsham District Planning Framework

- 4.5 There are a number of policies within the Horsham District Planning Framework which seek to ensure that rural areas can continue to thrive and grow, whilst still maintaining a high quality environment. These policies arise throughout the document, but key policies include the following:
- 4.6 Outside defined built up areas, **Policy 26** seeks to protect the undeveloped nature of the rural environment from inappropriate development. The policy sets out a range of criteria which identifies the type of development in rural areas which would generally be supported. In addition to those which support agriculture, forestry or quiet recreation, the policy does provide for growth which 'enables the sustainable development of rural areas'. Further detail on the type of sustainable development that would be acceptable in rural areas is set out in a number of other policies. This includes provision for replacement dwellings and house extensions in the countryside (**Policy 28**), and provision of homes for rural workers (**Policy 20**). **Policy 10** (Rural economic development) provides more detail on rural economic development which seeks to support rural businesses and farm diversification. **Policy 11** (Tourism and Cultural facilities) provides the framework for tourism development in both urban and rural areas. Schemes which support rural diversification, benefit the local economy or enable retention of buildings or contribute to the character of the countryside will in particular be supported. Finally, **Policy 28** (Equestrian Development), identifies where equestrian development will be supported.
- 4.7 In general terms, these policies are considered to be working well. It is however recognised that there is potential for this policy framework to be 'fine-tuned' to ensure that the policies consider the NPPF requirement to support conversion of existing buildings and support rural communities. The review of these policies has therefore followed the following approach:
1. A review of existing built-up areas, to ensure that the distinction between the built areas and rural parts of the district are accurate and up-to-date.
  2. A review of rural communities within the district to identify hamlets which may be able to support a degree of infill to support these rural communities. This included consideration of rural worker provision and the conversion of existing buildings in the countryside to residential use.
  3. A review of policies supporting rural economic development, including rural economy and tourism.

The results and recommendations from this review are set out in the following pages.

## REVIEW OF BUILT-UP AREA BOUNDARIES

- 4.8 Built up area boundaries are a planning policy tool which are used to define areas of the District which are considered to be 'countryside.' In these areas, development is generally restricted to development which supports agriculture, forestry or leisure purposes. Within the defined 'built-up areas' of District, the principle of infilling and redevelopment is generally accepted, providing that other matters such as design and the scale of development are agreed. Policy 3 of the HDPF sets out the development hierarchy which identifies which settlements have a built-up area boundary. In general terms these are the larger settlements in the district which have a range of services and facilities and are therefore able to absorb some additional growth. Larger settlements are considered to have a greater capacity for growth than smaller villages and hamlets.
- 4.9 The local plan review process will need to review the development hierarchy, to review the wider capacity of each settlement to accept sustainable growth. It is however recognised that since the adoption of the HDPF, there are some areas around existing settlements which have now come forward for residential development, and this early stage of the Local Plan Review process provides a good opportunity to undertake a review of the built-up area boundaries themselves to ensure that each settlement boundary accurately reflects where land has a built-up or rural form.
- 4.10 In order to ensure a consistent approach to the review of built-up area boundaries a methodology has been devised to ensure a clear and consistent approach to the designation of all BUABs in the district. The approach to the review and the criteria considered in the assessment is set out below:

### *Review process*

- 1) **Unclassified settlements** (HDPF Policy 3) are excluded from the drawing of a built-up area boundary. These settlements have few or no facilities or social networks / limited accessibility and are not considered sustainable locations for significant levels of development. The capacity for these smaller settlements to absorb a limited level of growth is addressed later in this document (**paras 4.14-4.17 and Table 6**)
- 2) **HDPF Allocations** – Where land is allocated in the HDPF, these are shown as allocations on the proposals map. Once allocations have been granted planning permission and development, the built-up area should be amended to include these sites in the BUAB. The boundary should reflect the built form of the development, and it should be considered whether landscape buffers or other areas of landscaping relate to the countryside or have an urban form.
- 3) **Identification of new development areas** - Until the adoption of the HDPF, Horsham District Council was unable to demonstrate a 5 year housing land supply. As a result a number of housing sites have come forward for development on land which was adjoining but outside the existing BUAB. Where land which has planning permission and development has either commenced or completed, it will be necessary to consider whether these sites have a relationship to the existing

urban form. Where this is the case, the land will be included in the updated built-up area boundary.

- 4) **Review of existing boundaries** – In some areas, the built form of existing settlements has changed since the adoption of the HDPF, and in some cases small anomalies have arisen as a result of changes to OS base maps over time. Again the review of the boundary considers whether the land has a relationship with the built or existing urban form or the rural landscape.

*Assessment criteria*

- 5) In many cases new areas of development will be included in the BUAB. However, it is necessary to consider what impact the potential sites for inclusion in the updated boundary will have on settlement coalescence and landscape /rural character. This includes consideration of the relationship and connectivity of the new development with the existing settlement. The criteria used in the assessment process are set out below. In general terms however, a starting point for the assessment was to ensure that as far as possible, BUABs follow logical and defensible boundaries such as roads / rights of way, curtilages of properties, water courses and woodland belts.

a) *Settlement coalescence*

- Sites which significantly reduce the break / openness between settlements – **exclude**
- Sites which generate urbanising impacts in the settlement gap beyond the development (e.g. artificial lighting, amendments to road layouts) – **exclude**

b) *Landscape / rural character*

- Relationship with existing built-form – new development which does not have a clear relationship with the existing BUAB (e.g. is separated from the existing boundary due to topography / landform/ landscaping /open space)– **exclude**
- Settlement form – amendments which would significantly alter settlement form / pattern (e.g. linear settlement form/ribbon development) – **exclude**
- Historic environment – amendments to the BUAB which would have a significant adverse impact on the historic environment were infill or redevelopment to take place, including harm to listed buildings, conservation areas, archaeology (e.g. the setting of a listed building outside but close to the BUAB) – **exclude**
- Areas of landscape importance – sites which through intensification of use could have adverse impacts on protected landscape – **exclude**
- Connectivity with existing settlement – poor relation to existing settlement (e.g. lack of footpath / road connections) - **exclude**

- c) *Other factors* – where the following features occur *on the edge* of an existing BUAB, these would normally be excluded, as these areas form a transition from the urban to rural environment and are generally protected from development through other policies (e.g. biodiversity / community facilities, leisure and recreation policies).

- Allotments
- Playing fields / sports grounds (includes school playing fields)

- Designated wildlife sites / ancient woodlands and any associated buffers
  - Flood plain
  - Protected landscapes (AONB / proximity to SDNP)
- d) *Gardens* – In most instances garden land should be included in the BUAB as they will form part of the urban / townscape setting. It is however recognised that gardens can form an important part of the transition between the rural and urban environment, and there may be some instances, particularly where there are houses located in larger plots, that the character of the area would be adversely affected as a result of increased development. Inclusion of these sites should therefore be made on a case by case basis. Where garden land relates more to the rural than urban landscape these sites should be excluded.
- 4.11 The results of the review of existing built-up areas is summarised in the Table 6 below. It includes sites which have been identified by the Council and those which have been proposed to the Council to consider as part of the Local Plan Review process. This identifies the sites which are proposed for inclusion in an updated BUAB together with a reason for the proposed inclusion. The site location maps are shown in **Appendix 2**. It should be noted that this review DOES NOT include a review of and identification of larger scale sites for development. This is a matter for a later stage of the local plan review process, or for smaller non-strategic sites that come forward through the neighbourhood planning process.
- 4.12 We are seeking your views on these proposed amendments to the built-up area boundary through this consultation. These will be taken into account and updates will be made during future consultations during the Local Plan review preparation process. In the longer term proposed changes to the BUAB will be shown on any updated Policy Maps which accompany the publication of any Regulation 19 documentation. Once a plan has been submitted for examination, any further proposed changes to these maps will, if necessary, be shown on updated plans and will be set out in a schedule of proposed modifications / amendments which will be submitted to the Inspector for their consideration. Additional *minor* changes to the BUAB may be made at the adoption stage, subject to the agreement of the Cabinet Member. This may potentially include development which has gained planning permission and the principle of development is therefore agreed and has been subject to consultation, and where development has commenced.

**Table 6: Sites with potential for inclusion in the updated built-up area boundaries.**

Site Reference	Site Name and Address	Proposal	Reason for proposed inclusion / deletion
AS1	Land to rear of Oast House Farm and Oakwood House, Ashington	Inclusion of entire curtilage in BUAB	Inclusion of curtilage of two gardens which relate to the built environment rather than the countryside beyond.
AS2	Ashington Services, Ashington	Inclusion of land within BUAB	A new petrol station has been permitted and development has now been completed. The built form and appearance of Ashington now extends to the north. It is therefore considered that the BUAB of the settlement be drawn to accommodate this site. This also includes an area of land between houses in Ivy close and the A24, but it is considered that this site does not have a relationship with the countryside beyond.
B1	Downland Park Caravan Park, Bramber	Inclusion of caravan park within BUAB	Inclusion of a park homes site. This has a built-up appearance which has a closer relationship with Bramber than it does to the countryside beyond. The site adjoins the South Downs National Park and any proposals for the intensification of this site would need to consider the impact on this designation.
BBH1	Land North of Old Guildford Road, Broadbridge Heath	Inclusion of new development area within built-up area boundary	Permission has been granted for 165 homes (DC/13/2408) and a 40 bed residential care home, bungalows and apartments. Development has now commenced and now has a clear relationship with the existing built form of Broadbridge Heath.
BBH2	Land South of Wickhurst Green, Broadbridge Heath	Inclusion of new development area within built-up area boundary	Land was allocated for development as part of growth to the west of Horsham in the 2007 Core Strategy. The development has now been built out in this location, and the BUAB should be amended to reflect the road layout and form of the development which has taken place.
BG1	Land North of Sycamore Rise, Barns Green	Deletion of Ancient Woodland / Parsons Brook	Land to the north of Sycamore Rise is an area of ancient woodland. It relates to the countryside and not the built form and should therefore be deleted from the BUAB.
BL1	Land East of Billingshurst	Inclusion of new development area within built-up area boundary	Permission has been granted for 475 homes and development has now commenced.

Site Reference	Site Name and Address	Proposal	Reason for proposed inclusion / deletion
BL2	Land East of Daux Avenue, Billingshurst	Inclusion of new development in BUAB	This is an area of new development of 46 homes DC/11/2385 which has now been completed. It has a clear relationship with the existing built form and should therefore be incorporated into the amended BUAB.
BL3	Land at Kingsfold Close to Land South of Marringdean Acres, Billingshurst	Inclusion of new and existing development in BUAB	Residential development, including land allocated in the HDPF has now taken place extending the built form of Billingshurst to the south. This now includes Kingsfold Close, which now relates to the extended built form of the settlement.
CF1	Land at the Vicarage and Old Vicarage, Cowfold	Inclusion of curtilage in BUAB	Land at the Vicarage and Old Vicarage have a stronger relationship with the built form of Cowfold rather than the countryside beyond.
CF2	Land East of Alley Groves, Cowfold	Inclusion of new development in BUAB	Land for 20 dwellings has been permitted DC/14/1478 and development on this site has now commenced. The site now relates to the built form of Cowfold rather than the surrounding countryside.
CF3	2 Oak Apple Close, Cowfold	Inclusion of whole curtilage within BUAB	Inclusion of curtilage of the whole property, which relates to the built environment rather than the countryside beyond.
HF1	Land north of West End Lane, Henfield	Inclusion of new development in BUAB	Land for 160 dwellings has been permitted DC/13/0787 and development on this site has now commenced. The site now relates to the built form of Henfield rather than the surrounding countryside.
HF2	Land East of Manor Close	Inclusion of new development in BUAB	Land for 102 dwellings has been permitted DC/13/1266 and development on this site has now commenced. The site now relates to the built form of Henfield rather than the surrounding countryside.
HS1	Land North of Horsham	Inclusion of new development area within built-up area boundary	This site is currently allocated for development in the Horsham District. Once development commences the site will need to be included in the updated built-up area boundary.
LB1	Land west of Lower Beeding	Inclusion of curtilages of cedar Cottage and Gardeners Cottage in BUAB	Inclusion of curtilage of two properties which relate to the built environment rather than the countryside beyond. Land beyond these homes are in residential use but have the characteristics of ribbon development, where intensification of development would have an impact on settlement coalescence with Cisswood Hotel to the west.

Site Reference	Site Name and Address	Proposal	Reason for proposed inclusion / deletion
MH1	Land South of Swallowfield Close, Mannings Heath	Deletion of Land from BUAB	This site was included in the BUAB following the preparation of the Nuthurst Neighbourhood Plan. This site does not include the land which was allocated for development in the plan and should therefore be removed from the BUAB.
PG1	Homelands Cottages to Crouchers, Partridge Green	Inclusion of Land within the BUAB	To the south of Partridge Green there are a small number of properties. These are located at the entrance to the settlement and the street scene takes on a more urban appearance. As the properties to the east are open to the wider countryside and close to or form part of the curtilage of existing listed buildings it is considered on this occasion that only some of the curtilage of the properties should be excluded. Yew Tree Cottage is excluded as it is more distant from the other dwellings. It is also listed and would be harmed from any intensification on this site.
PL1	Land South of Stane Street Close, Codmore Hill, Pulborough	Inclusion of new development area within built-up area boundary	Land for 103 dwellings has been permitted DC/11/0952 and development on this site has now commenced. The site now relates to the built form of Pulborough rather than the surrounding countryside.
PL2	Land South of Lower Street, Pulborough	Inclusion of property curtilages within BUAB	The river Arun provides a clear demarcation of the built form of Pulborough with the countryside beyond. Although the land in these curtilages is within the floodplain it is considered that this amendment will provide a more logical boundary. Development will be highly constrained by the proximity to the river.
RW1	Jasmine House, Rudgwick	Inclusion of property curtilages within BUAB	Land as far as Jasmine house has an urban frontage and relationship with land the rest of Rudgwick to the south. This view was shared by a planning inspector in relation to DC/15/2644
RW2	Land north of Lynwick Street to 'Rooters' Rudgwick	Inclusion of property curtilages within BUAB	The properties north of Lynwick Street have a suburban appearance. It is considered that these properties should be included in the BUAB. The south of the road is rural in appearance and development beyond 'Rooters' would lead to urbanisation of an area which is more rural in character and less related to the built form of Rudgwick.
RW3	Land South of Summerfold, Rudgwick	Inclusion of new development area within built-up area boundary	Permission has been granted for 36 dwellings (DC/09/1623) and development has been completed. The site now relates to the built form of Rudgwick rather than the surrounding countryside.

Site Reference	Site Name and Address	Proposal	Reason for proposed inclusion / deletion
RU1	Orchards and Woodbury, Rusper	Partial inclusion of property curtilages within BUAB	Orchards and Woodbury are two large properties on East Street and have a clear relationship with the built form of Rusper in this location. The rear gardens are large and the southern section are well treed creating a rural character which is considered to have a relationship with the countryside rather than Rusper.
SL1	3 and 4 Tannery Close, Slinfold	Inclusion of property curtilages within BUAB	Inclusion of curtilage of two properties which relate to the built environment rather than the countryside beyond.
SL2	Land rear of Chapel Cottage, Slinfold	Inclusion of property curtilages within BUAB	Inclusion of curtilage of two properties which relate to the built environment rather than the countryside beyond.
SL3	Halfpenny House and Farthings, Slinfold	Inclusion of property curtilages within BUAB	Inclusion of curtilage of two properties which relate to the built environment rather than the countryside beyond. The existing BUAB currently bisects the two properties.
SL4	Land to the rear of Gatefield Cottages, Slinfold	Deletion of land from the BUAB	Land rear of Gatefield cottages is overgrown and well vegetated. It has no direct relationship to the built form of the village and it is therefore considered the land should be deleted from the BUAB.
SL5	Land to rear of Hayes Lane	Inclusion of new development area within built-up area boundary	Permission has been granted for 23 dwellings (DC/13/1792) and development has been commenced. The site is located between Hayes Lane and Maydwell Business Park and now relates to the built form of Slinfold rather than the surrounding countryside.
SD1	3 Orchard Close, Small Dole	Inclusion of property curtilages within BUAB	Inclusion of curtilage of 3 Orchard Close which relates to the built environment rather than the countryside beyond.
SD2	1 & 2 Henfield Road, Small Dole	Inclusion of property curtilages within BUAB	These two properties are located on the A2037 and have a clear relationship with the built form of Small Dole rather than the surrounding countryside. These buildings should therefore be included in the BUAB.
SW1	The Copse, Worthing Road, Southwater	Partial inclusion of property curtilages within BUAB	The Copse is a large property on Worthing Road and the southern part of the property has a clear relationship with the built form of Southwater in this location. The rear garden is large and well vegetated, creating a rural character which is considered to have a relationship with the countryside rather than Southwater.

<b>Site Reference</b>	<b>Site Name and Address</b>	<b>Proposal</b>	<b>Reason for proposed inclusion / deletion</b>
SW2	Land at Welcome Place and Courtlands, Southwater	Inclusion of new development area within built-up area boundary	Permission has been granted for a number of dwellings through a series of planning applications DC/09/1923, DC/131474 and DC/14/1606. Development has now been completed. The site now relates to the built form of Southwater rather than the surrounding countryside.
SW3	Land West of Southwater	Inclusion of new development area within built-up area boundary	This site is currently allocated for development in the Horsham District. Once development commences the site will need to be included in the updated built-up area boundary.
SW4	Land South of Southwater	Inclusion of new development area within built-up area boundary	Permission has been granted for 193 dwellings (DC/14/2582) and construction of this site has now commenced. The site now relates to the built form of Southwater rather than the surrounding countryside.
ST1	Land at Meads Walk, Steyning	Inclusion of built development within BUAB	This is an area of built development which relates to the built form of Steyning. The current BUAB of Steyning currently bisects the properties in Meads Close and this incorporates all the built development on this road.
ST2	Steyning Primary School	Inclusion of hardstanding within BUAB	The area of hardstanding relates to the built form of the settlement rather than the rural environment.
ST3	Land South of Sopers Lane, Steyning	Partial inclusion of property curtilages within BUAB	The dwellings on this section of Sopers Lane relate to the built form of Steyning rather than the countryside beyond. The site adjoins the South Downs National Park and any proposals for the intensification of this site would need to consider the impact on this designation.
SR1	Fryern Court and Fryern Place, Storrington	Inclusion of property curtilages within BUAB	This area has a built-up appearance which has a closer relationship with the built form of Storrington than it does to the countryside beyond.
SR2	Oaklands House, Storrington	Inclusion of property within BUAB	This is a minor amendment to the BUAB to correct a GIS mapping error to include all land within the curtilage of this property within the BUAB.
T1	Church View, The Street, Thakeham	Inclusion of property curtilage within BUAB	Inclusion of the curtilage of Church View, which relates to the built form of the village of Thakeham rather than the countryside beyond. This amendment makes a clearer, more logical boundary which follows the property curtilage. This is consistent

Site Reference	Site Name and Address	Proposal	Reason for proposed inclusion / deletion
			with other listed buildings which already form part of the BUAB in this area
T2	Rushfield Bungalows, High Bar Lane, Thakeham	Inclusion of property curtilages within BUAB	Inclusion of two dwellings. This has a built-up appearance which has a closer relationship with the built form of Thakeham than it does to the countryside beyond.
T3	Land at Abingworth Nurseries, Thakeham	Inclusion of new development area within built-up area boundary	This site has permission for 146 dwelling (DC/10/1314) and development has now commenced. This area now has an urban appearance which relates to the built form of Abingworth and should be incorporated into the BUAB.
UB1	2 and 4 College Road, Upper Beeding	Inclusion of property curtilages within BUAB	Inclusion of two dwellings. This has a built-up appearance which has a closer relationship with the built form of Upper Beeding than it does to the countryside beyond. The site adjoins the South Downs National Park and any proposals for the intensification of this site would need to consider the impact on this designation.
UB2	Depot south of Henfield Road, Upper Beeding	Inclusion of property curtilage within BUAB	Inclusion of an existing business site. This has a built-up appearance which has a closer relationship with the built form of Upper Beeding than it does to the countryside beyond. The site adjoins the South Downs National Park and any proposals for the intensification of this site would need to consider the impact on this designation.
WN1	Apple Garth, Warnham	Inclusion of property curtilage within BUAB	Inclusion of curtilage of the Curtilage of Apple Garth, which relates to the built environment of Warnham rather than the countryside beyond.
WN2	45 Bell Road, Warnham	Inclusion of property curtilage within BUAB	Inclusion of curtilage of the whole garden of this property which relates to the built environment rather than the countryside beyond.
WN3	55, 57 and Police House, Bell Road, Warnham	Inclusion of property curtilages within BUAB	Inclusion of curtilage of these properties which relate to the built environment of Warnham rather than the countryside beyond.
WN4	Fairfold, Warnham	Inclusion of property curtilage within BUAB	Inclusion of curtilage of the whole garden of this property which relates to the built environment rather than the countryside beyond.

<b>Site Reference</b>	<b>Site Name and Address</b>	<b>Proposal</b>	<b>Reason for proposed inclusion / deletion</b>
WN5	45 Friday Street, Warnham	Inclusion of all property curtilage within BUAB	Minor amendment of BUAB to correct a mapping error and include the whole garden of this property which relates to the built environment rather than the countryside beyond.
WC1	Hatches House, West Chiltington Village	Partial inclusion of property curtilages within BUAB	The western half of this property relates to the built environment of West Chiltington Common. The eastern half of the curtilage is however heavily vegetated and has a relationship with the rural countryside rather than the village.
WC2	Lakers House, West Chiltington Common	Partial inclusion of property curtilages within BUAB	Inclusion of curtilage of this property which relates to the built environment of West Chiltington Common rather than the countryside beyond.
WC3	The Windmill and Trian by the Mill, West Chiltington Common	Inclusion of property curtilages within BUAB	Inclusion of curtilage of the gardens of these properties which relates to the built environment rather than the countryside beyond.
WC4	New Barn Cottage West Chiltington Common	Inclusion of property curtilages within BUAB	Inclusion of curtilage of the whole garden of this property which relates to the built environment rather than the countryside beyond.
WC5	Shepherd's Cottage, West Chiltington Common	Partial inclusion of property curtilages within BUAB	The western half of this property relates to the built environment of West Chiltington Common. The eastern half of the curtilage is however heavily vegetated and has a relationship with the rural countryside rather than the village.

## **DEVELOPMENT WITHIN 'UNCLASSIFIED' SETTLEMENTS**

- 4.13 The Horsham District Planning Framework policy considers anything outside of Built-Up Area Boundaries as 'countryside' and development proposals in these areas are considered against a much more 'restrictive' policy than land within built-up area boundaries.
- 4.14 It is however recognised that the land outside the built-up areas within Horsham District is not uniformly undeveloped farmland, and it does include a number of small hamlets and villages which are defined as 'unclassified settlements' in Policy 3 of the HDPF. These settlements lack a significant level of services and facilities, and are therefore not a sustainable location for large scale development, but conversely have been recognised as having potential for some limited development when compared with entirely undeveloped fields against which Policy 26 would also apply. This conflict has been identified through planning applications where in some instances, development has been permitted on appeal as a result of this existing policy framework. Hunters Oak in Faygate (planning application number DC/16/2785) is a recent example, where development was not particularly isolated and where new development was considered to be appropriate. The Council has therefore revisited the 'unclassified' settlements in Horsham District and sought to identify areas where some limited development may be appropriate.
- 4.15 A mechanism by which some development could take place is through the identification of 'secondary settlement' boundaries in which a small amount of infill development may be considered acceptable. The approach by which these settlements have been identified is set out in the following paragraphs.

### **Identification of Secondary Settlements**

- 4.16 Unclassified settlements in Horsham district were initially identified through a desk-top study. A number of characteristics were then considered, where settlements were visited in order to determine whether the settlement may be appropriate for designation of a secondary settlement as follows:
- 1) Presence of services and facilities. Policy 3 of the Horsham District Planning Framework sets out that development should take place in the most sustainable locations, and the settlement hierarchy identifies those settlements with the greatest range of services and where development therefore has capacity to support additional infilling or redevelopment. For each of the settlements identified, it was therefore considered as to whether there were any local services present. This included primary schools, allotments, village halls, playing fields, churches or other similar features, all of which may indicate the presence of a local community.
  - 2) Presence of local employment. Whilst some settlements may have relatively few local services as a result of their scale, the presence of local employment

may also be indicative of an established settlement and may have some potential to offer local employment.

- 3) Proximity to other services, facilities and employment and ease of access. Given the small scale and limited services in each of the settlements it was recognised that any residents of these settlements are likely to be reliant to a great degree on the car, or public transport if available, to meet day to day needs or to travel to work. The distance to nearby settlement centres was therefore identified, and the proximity to the wider strategic road network (A and B roads in particular were identified).
- 4) Settlement characteristics - a number of factors were considered including settlement form and density. The character of the settlement was also a consideration, for example taking into account the age or historic character of the dwellings. A key consideration was whether these factors combined to give a 'sense of place' with the sense of leaving the countryside and arriving in a small hamlet or village.

4.17 The results of the assessment are set out in the Table 7 and the proposed secondary settlement boundaries are set out in [Appendix 3](#). Where boundaries have been drawn a similar process was considered to the designation of built-up area boundaries as set out on earlier in this document. In order to provide a greater degree of certainty regarding the nature of development which would be considered acceptable in designated secondary settlements, a policy along the lines set out below is suggested.

Proposed policy - Secondary settlements

Planning permission will be granted for residential infilling within defined secondary settlements provided that:

- a) the site is a small gap or plot within an otherwise built-up settlement form; and
- b) the proposal is limited in scale to reflect the existing scale and character of the settlement function and form; and
- c) the development does not result in significant increase in activity including traffic movements on narrow and rural roads.

What are your views on the designation of secondary settlements?

- Will secondary settlements help to distinguish the smaller settlements in this district where some infill may be acceptable, as opposed to the wider countryside where policy 26 would apply?
- Have we identified the correct settlements or are there other small settlements which should be considered?
- Do you have any comments on the proposed boundaries?

**Table 7 - Assessment of unclassified settlements**

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Adversane</b>	Billingshurst	Public House	Brinsbury College campus to south	Located on A29, approx. 2.7km from Billingshurst village centre	Adversane is a small hamlet located on a crossroads with the A29 as the main north south route. Some of the settlement is designated as a Conservation Area and the presence of listed buildings help to provide a sense of place. Although there are limited local services, the settlement is reasonably close to both Billingshurst and Pulborough both of which are designated larger villages and towns in Policy 3 of the HDPF.	<b>Designate as a secondary settlement</b>
<b>Ashurst</b>	Ashurst	Public House, Village Hall, Primary School, Church	N	Located on B2135 approx 5km from Steyning village Centre and 3.6km from Partridge Green village centre	Ashurst is one of the larger unclassified settlements located in Horsham District. The settlement has a number of services and facilities including a primary school and village hall clearly indicating the presence of a community and sense of place.	<b>Designate as a secondary settlement</b>
<b>Blackstone</b>	Woodmancote	N	Y	Located on Blackstone Lane. Connects to A281 to the South and B2116 to the North. Approx 2.5km from Henfield village centre	Blackstone is a small hamlet. There has been a settlement in this location for several hundred years and most of the buildings are historic in nature, many of which are listed. Much of the settlement is designated as a Conservation Area. This historic character, coupled with the presence of some local businesses therefore contributes to a clear sense of place.	<b>Designate as a secondary settlement</b>

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Brooks Green</b>	Shipleigh	N	N	Not located on an A or B road. Connects to B2139 and A272 at Coolham to the south. Approx 5km from Southwater village centre	Brooks Green comprises a few isolated dwellings located on the road north of Coolham. There is no sense of arrival at a destination, and there are no services or facilities which are indicative of a community in this location. Residents here will be entirely reliant on the car to obtain all their needs.	Do not designate as a secondary settlement
<b>Clemsfold</b>	Slinfold	N	Y - car garage / care home	Located on the A29. Approx 3.5km to Warnham village centre and 3.8km from Broadbridge heath village centre	Clemsfold comprises a number of dwellings and a couple of small businesses located on the A29. There is no clear sense of arrival at a destination and the limited facilities do not indicate that there is an established community in this location. Although there is some limited employment, it is likely that residents will be entirely reliant on the car to access all of their needs.	Do not designate as a secondary settlement
<b>Colgate</b>	Colgate	Primary School, Public House, Church		Located on Forest Road. Connects to B2195 to the West and A23 to the East and 4.3km from local services in Roffey, Horsham	Colgate is one of the larger unclassified settlements located in Horsham District. The settlement has a number of services and facilities including a primary school and village hall clearly indicating the presence of a community and sense of place. It should however be noted that the village is wholly located in the High Weald AONB so the landscape is sensitive to change.	<b>Designate as a secondary settlement</b>

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Coolham</b>	Shipleigh	Primary School, Public House	Y	Located on A272 and B2139. Approx 6.6km to Southwater village centre.	Coolham is located on a crossroads of the A272 and the B2139 which runs southwards towards Thakeham and Southwater. Although small, the settlement has a small primary school indicating the presence of a community. The settlement contains a number of historic buildings together with more modern properties, which together help contribute to a sense of place.	<b>Designate as a secondary settlement</b>
<b>Coneyhurst</b>	Billingshurst	N	N	Located on the A272 and is approx. 3km from Billingshurst village centre.	Coneyhurst comprises a few dwellings located on the A272. There is no clear sense of arrival at a destination, and there are no services or facilities which are indicative of a community in this location. Residents here will be entirely reliant of the car to obtain all their needs.	Do not designate as a secondary settlement
<b>Crabtree</b>	Lower Beeding	Public House	Y - hotel	Located on the A281 approx 2.9km north of Cowfold village centre	This is a small hamlet located on the A281. It has a predominantly linear form. Development in the settlement is of varying age, but includes some historic properties, many of which are clearly visible from the road and therefore which generate a sense of place arriving at the settlement. Although services are limited this settlement is the location of South Lodge Hotel, which offers employment opportunities locally.	<b>Designate as a secondary settlement</b>

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Dial Post</b>	West Grinstead	Public House, Village Hall,	Y - garden centre opposite side of A24	Located on A24. It is approx. 4.2km north of Ashington and 7km south of Southwater. There is no direct southbound access to the A24 as the road is dual carriageway.	This settlement is located on the western side of the A24. Although it has limited services and facilities, there is a small village hall which indicates the presence of a community. Although small this settlement is one of the larger 'unclassified' settlements and is located around a village green which gives it a clear sense of place. Some employment is available locally in the garden centre on the other side of the A24, although the busy nature of the road makes access on foot hazardous.	<b>Designate as a secondary settlement</b>
<b>Dragon's Green</b>	Shipleigh	Public House	N	Located on Dragons Lane. Connects to A272 to the South. It is approx. 4.5km south of Southwater village centre.	This is a small linear settlement with scattered and relatively isolated dwellings which lacks a clear sense of place. There is a single public house but residents are entirely reliant on the car for all services and facilities as well as employment.	Do not designate as a secondary settlement
<b>Faygate</b>	Colgate	Railway station (limited stops), playing fields / village hall		Located on A264. It is approx. 6km from Crawley town centre and 5.8km from Horsham town centre.	Located on the A264 between Horsham and Crawley, Faygate is close to a range of services and facilities in both settlements. It does however have relatively few services locally - very few trains stop at the station for example. The settlement has however expanded recently with the provision of local shop identified as part of the continuing care retirement village for which development has commenced. There is also a village hall and sports pitches indicating the presence of a community. The settlement also has a clear sense of place with both older and newer development located along road frontages.	<b>Designate as a secondary settlement</b>

Settlement Name	Parish	Presence of service / facility	Evidence of Local Business / Employment	Proximity to services in other settlements and access to Strategic Road Network	Settlement characteristics and sense of place	Initial recommendation
<b>Five Oaks</b>	Billingshurst	Shop in fuel station	Y - large garage - sales and repair	Located on A29/A264 Approx. 2.6km north of Billingshurst village centre.	Five Oaks is located on the A264 and A29 junction north of Billingshurst on which residents will be reliant for most of their services and facilities. Development in this area is dominated by a car showroom and garage, as well as a petrol station (which has a small shop), rather than the dwellings which have predominantly been built during the 20th century. Although there may be some employment opportunities at the garage, the dominant scale and appearance of the garage and petrol station therefore detract from the sense of place in this location.	Do not designate as a secondary settlement
<b>Ifield</b>	Rusper	Y (wide range in Crawley)	Y (wide range in Crawley)	Located on Rusper Road. A23 located to the East. Approx 4.1km from Crawley town centre.	This area of development directly adjoins the settlement of Crawley. Although it is outside the administrative area of Horsham District, Crawley is a key centre of employment locally and in the wider sub-region. The settlement also has a range of services and facilities both within the local neighbourhoods and also in the town centre. These again often have a sub-regional role. In addition, some land to the north of Rusper Road has planning permission for development of 95 homes (DC/14/2132). Given the relationship of these dwellings to Crawley, and the wider sustainability of this location, it is considered that it would be appropriate to recognise this.	<b>Designate as a secondary settlement</b>

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Itchingfield</b>	Itchingfield	Primary school now relocated to Barns Green, Church	N	Located on Itchingfield Road/Fulfords Hill. Connects to A264 to the North. Approx 2.4km to Barns Green village centre.	Itchingfield primarily comprises a number of low density dwellings, most of which are set within wooded properties and set back from the road. It is therefore difficult to identify any clear 'beginning or end' to the settlement which limits a clear sense of place. Since the relocation of the primary school to a new site in Barns Green there are no services and facilities locally, and residents are therefore likely to be wholly reliant on the car for accessing all their needs.	Do not designate as a secondary settlement
<b>Kingsfold</b>	Kingsfold	Public House	Close by - builders yard to north	Located on A24. Approx 3.5km from Warnham Village centre.	Located on the A24 and junction with Marches Road, Kingsfold is a small hamlet. It has a compact form with a number of properties directly fronting the road which contribute to a clear sense of arriving and leaving the settlement. The buildings also very in age and scale which therefore assists in creating a sense of place. There are however limited services and facilities and residents are reliant on the car to access all their needs.	<b>Designate as a secondary settlement</b>
<b>Lambs Green</b>	Rusper	Public House	Y - builders yard to east	Located on Littleworth Lane/Mill Lane. Connects to B2116 to the South and B2135 to the West. Approx 2.1km from Rusper village centre.	Lambs Green is a very small hamlet of less than 20 properties, some of which are not visible from the road which passes through the settlement, limiting any clear sense of place. The limited facilities do not provide any indication of an established community and residents are likely to be entirely reliant on the car to access all of their needs.	Do not designate as a secondary settlement

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Littleworth</b>	West Grinstead	Public House, Allotments	N	Located on Littleworth Lane/Mill Lane. Connects to B2116 to the South and B2135 to the West. Approx 1km to Partridge Green village centre	Littleworth is a small hamlet which is predominantly centred along Littleworth Road, a short distance north of Partridge Green, which contains a reasonable level of services and facilities. There are a number of allotments within Littleworth which are available for the use of residents in both Littleworth and Partridge Green, and helps to provide evidence of an established community in this area. The dwellings in this area are a mix of sizes and ages which help to contribute to a sense of place.	<b>Designate as a secondary settlement</b>
<b>Maplehurst</b>	Nuthurst	Public House	N	Located on Nuthurst Road. Connects to A281 to the North and A272 to the South. Approx 6.8km from Southwater village centre	Maplehurst is located on rural crossroads to the south of Nuthurst village. It is characterised by a small number of dwellings which vary in age from older properties, some of which are listed to those which are more modern in character. The settlement has been identified as a location for a small amount of development in the Nuthurst Neighbourhood Plan, providing evidence of support for some small scale growth and the presence of a small community in this location. It should however be recognised that residents will be reliant on the car to meet their daily needs.	<b>Designate as a secondary settlement</b>

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Marehill</b>	Pulborough	Public House	N	Located on A283, approx. 1.1km east of Pulborough village centre	Marehill is primarily comprised of low density developments. Although a number of these are directly accessed from the A283, they are set back from the road, which therefore limits the sense of place. Although the settlement is relatively close to Pulborough which is located to the west, there are few services locally and residents will therefore be reliant of the car to access nearly all of their day to day needs.	Do not designate as a secondary settlement
<b>Monks Gate</b>	Nuthurst	N	N	Located on A281. Approx 2.1 to Mannings Heath village centre and 7.5km to Horsham town centre	Monks Gate is located on the A281 south of Mannings Heath. It is characterised by a small number of dwellings which vary in age from older properties to those which are more modern in character. The settlement has been identified as a location for a small amount of development in the Nuthurst Neighbourhood Plan, providing evidence of support for some small scale growth and the presence of a small community in this location. It should however be recognised that residents will be reliant on the car to meet their daily needs. There is a former parkland landscape in this area, together with a listed building, and the sensitivity of which should be considered. Some dwellings are not visible from the road leading to the appearance of two separate but linked parts of the hamlet.	<b>Designate as a secondary settlement</b>

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>North Heath</b>	Pulborough	N	N	Located on Gay Street Lane. Connects to A29 to North West. Approx 2.8 to Codmore Hill	North Heath is a small collection of dwellings, located along a rural road to the east of the A29. There are some other scattered residential dwellings along and adjoining the A29, but there is no connectivity or direct relationship between these homes. There is therefore an appearance of scattered rural dwellings rather than of a distinct community or settlement. There are no local facilities and residents are likely to be entirely reliant on the car to access all of their needs.	Do not designate as a secondary settlement
<b>Nutbourne</b>	Pulborough	Public House	Y - garage	Located on The Street via Nutbourne Road. Connects to A283 to the South West. Approx 2.9km from Pulborough village centre	Nutbourne is a small hamlet. There has been a settlement in this location for several hundred years and most of the buildings are historic in nature, many of which are listed. Much of the settlement is designated as a Conservation Area. This historic character, coupled with the presence of some local businesses therefore contributes to a clear sense of place.	<b>Designate as a secondary settlement</b>
<b>Nutbourne Common</b>	Pulborough	N	Y Nutbourne Studio	Located on Nutbourne Road. Connects to A283 to the West. Approx 2.3km from Pulborough village centre	This settlement is characterised by a small collection of dwellings, many of which are very low density. There is a single local business but there are no services and facilities, with residents reliant on the public car to access their needs. Overall these homes have a feel of isolated rural dwellings rather than a specific settlement.	Do not designate as a secondary settlement

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Nuthurst</b>	Nuthurst	Primary School, Public House, church	Y - plant nursery	Located on Nuthurst Street. Connects to A281 to the North and A272 to the South. Approx 3km from Mannings Heath and 6.4 km to Horsham town centre	Nuthurst is a relatively small settlement but has a number of community facilities including a primary school which helps to act as a focus for the wider parish community and is clear evidence of a small community in this location. There is also a small amount of local employment. The historic character of the buildings in Nuthurst help to contribute to a sense of place.	<b>Designate as a secondary settlement</b>
<b>Rowhook</b>	Slinfold, Rudgwick and Warnham Parish	Public House	N	Located on Rowhook Road. Connect to A29. Approx 4.5km to Warnham village centre and 4.8km to Broadbridge Heath village centre	Rowhook is a very small hamlet of less than 20 properties, some of which are not visible from the road which passes through the settlement, limiting any clear sense of place. The limited facilities do not provide any indication of an established community and residents are likely to be entirely reliant on the car to access all of their needs.	Do not designate as a secondary settlement
<b>Shermanbury</b>	Shermanbury	N	Y - small car sales business operating from property	Located on A281. Approx 1.3km from Partridge Green village centre.	Shermanbury is a linear predominantly 1930s settlement located along the A281. It has no local services and facilities with reliance on the car to reach those nearby (at Henfield, Partridge Green or Cowfold). The settlement has been identified as a small amount of development in the Wineham and Shermanbury Neighbourhood Plan, which provides evidence of a small community in this location with some support for small scale growth in this location. An application has recently been submitted for this allocation (DC/18/0091) and if a secondary settlement boundary is designated, this site may need to be included.	<b>Designate as a secondary settlement</b>

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Shipley</b>	Shipley	Primary School, Public House, Church		Located on Red Lane via Pound Lane which connects to A272. Approx 4.8km to Southwater village centre.	Although small, the hamlet of Shipley has a clear sense of place, focussed around the historic core of the Church and windmill, which is a local landmark. The village has a school (although this is approximately 0.5km away from the hamlet centre), but does provide clear evidence of an established local community.	<b>Designate as a secondary settlement</b>
<b>The Haven</b>	Rudgwick	Public House (Not directly adjoining other properties )	N	Located on Haven Road which connects to A29 to the South and A281 to the North Approx 5.2 km to Billingshurst village centre	The Haven comprises a few dwellings located on a small rural crossroads, between Billingshurst and Rudgwick. The public house does not adjoin the residential dwellings. There are no services or facilities which evidence an established community in this location. Residents here will be entirely reliant of the car to obtain all their needs.	Do not designate as a secondary settlement
<b>Tower Hill</b>	Southwater	N	N	Connects to B2237 Approx 1.4km to Horsham town centre	Tower Hill is located to the west of the Worthing Road between Horsham and Southwater. Both of these settlements contain a range of services and facilities. Horsham being the main town within the district, thereby providing strategic level facilities together with a range of employment opportunities. Although a low density development, the form of the settlement contributes to a sense of place.	<b>Designate as a secondary settlement</b>
<b>Warminghurst</b>	Ashington	Church	N	Located on Rectory Lane via London Road which connect to B2133 to the North and A24 to the North and South. Approx 1.6km to Ashington village centre.	Warminghurst comprises solely of the church with no other appreciable development. There is no sense of place or characteristics of a settlement and no other services and facilities.	Do not designate as a secondary settlement

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>West Grinstead</b>	West Grinstead	Church	N	Located on B2135. Approx 4.3km to Partridge Green village centre	West Grinstead comprises solely of the church with limited development nearby. Although there is a designated conservation area, there is no clear sense of having arrived in a small settlement. There are no other services and facilities at West Grinstead or close by.	Do not designate as a secondary settlement
<b>Wineham</b>	Shermanbury( and Twineham in Mid Sussex administrative area)	Public House	N	Located on Wineham Lane. Connects to B2116 to the South and A272 to the North. Approx 5.3km from Henfield village centre	Wineham is a predominantly linear settlement located on the boundary of Horsham and Mid Sussex District. There is a public house, but there are no other services and facilities which mean that residents must travel to other settlements (by car) to obtain all their needs. This was reflected in the Examiner's report of the Shermanbury and Wineham Neighbourhood Plan The linear nature of the settlement and the modern and relatively dispersed nature of many of the dwellings do not contribute to a clear 'sense of place'.	Do not designate as a secondary settlement
<b>Wiston</b>	Wiston	Village Hall (in SDNP) (Post office has closed), Church	Y (Wiston Estate / nursery businesses)	Located on Water Lane. Connects to A283. Approx 2.6km from Ashington village centre	Wiston is a dispersed settlement primarily located to the north of the A283. Community facilities are limited, with the post office having closed recently and the café / meeting place now being more occasional in nature. The settlement is one of dispersed dwellings rather than a readily definable hamlet.	Do not designate as a secondary settlement

<b>Settlement Name</b>	<b>Parish</b>	<b>Presence of service / facility</b>	<b>Evidence of Local Business / Employment</b>	<b>Proximity to services in other settlements and access to Strategic Road Network</b>	<b>Settlement characteristics and sense of place</b>	<b>Initial recommendation</b>
<b>Woodmancote</b>	Woodmancote	Village Hall (currently closed), Church	N	Located on the A281. Approx 2.9 from Henfield village centre.	Woodmancote is a predominantly linear settlement located on the A281. The development is low density and the well treed nature of the dwelling plots limits the visibility of many of the homes from the road. This therefore reduces the sense of arrival or leaving the settlement. There are currently no local services and facilities, with residents reliant on the private car to reach services or employment locations.	Do not designate as a secondary settlement

DRAFT

## Isolated Dwellings in the Countryside

- 4.18 The policies in the Horsham District Planning Framework do not support residential development outside built-up area boundaries, and if the principle of secondary settlements is taken forward into the new Local Plan, land outside these areas would generally not be supported. This approach is in accordance with the NPPF which does not generally support isolated development in the countryside. This is set out in more detail in paragraph 55 of the NPPF, which states:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:

- the essential need for a rural worker to live permanently at or near their place of work in the countryside;
- where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
- where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting;
- the exceptional quality or innovative nature of the design of the dwelling.”

- 4.19 Many aspects of these requirements are given further detail in the HDPF, with **Policy 19** providing greater detail on rural workers dwellings. Further detail on the re-use of redundant and disused dwellings is set out in **paras 4.23-4.24**. There have however been instances since the adoption of the HDPF where applications have been received to remove agricultural occupancy conditions. It is proposed that the existing policy is therefore amended to address cases where proposals are received to remove agricultural occupancy conditions. Suggested wording in this respect is set out below.

### Rural Workers Accommodation

Outside the defined built-up areas or secondary settlement boundaries, new housing for rural workers will be supported provided that;

- a) There is a functional need for the dwelling and the occupation of the dwelling is to support the established business use; and
- b) Evidence is submitted to demonstrate the viability of the rural business for which the housing is required.

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.

## **SUPPORT FOR RURAL BUSINESSES**

### **Rural Economic Development**

- 4.20 Although the main economic strategy is set out in Chapter 2, it is considered that the development of land outside built-up areas for economic development is closely related to the wider rural strategy, and further detail on this issue is therefore provided in this section of the document. It is recognised that there is a need to support growth and expansion of businesses and enterprises in rural areas through new developments and conversion of additional buildings as well as the development and diversification of other land based businesses. The overall strategy set out in Chapter 2 will provide further support for some existing businesses in rural areas, through the designation of some additional KEAs. In addition, it may be appropriate to allocate land for business development on sites located close to the strategic road network but not in or adjoining existing business areas.
- 4.21 In addition to this strategy it is recognised that there are other rural businesses which may wish to grow or expand, and at the current time, proposals are set out in HDPF Policy 10. Since the adoption of the HDPF this has helped to enable business development in the rural areas of the District, but it is considered that the policy could be fine-tuned to ensure that it is fit for purpose in the future and more clearly meets the requirements set out in the NPPF. The adopted policy could be amended as suggested in the box below:

#### **Rural Economic Development**

Sustainable rural economic development and enterprise within the district will be encouraged in order to generate local employment opportunities and economic, social and environmental benefits for local communities.

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. Any development 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; and either

- a) Proposals should, wherever possible be contained within suitably located buildings which are appropriate for conversion or, in the case of an established rural industrial or commercial site, within the existing boundaries of the estate.
- b) Proposals for new buildings or development in the rural area, will be supported where it can be demonstrated that criteria a) has been considered first, and that the proposal will contribute to sustainable rural economic growth that supports balanced living and working communities.

Any proposal must demonstrate that they will not adversely affect the character, appearance or visual amenities and the intrinsic character and beauty of the

countryside of the wider area. Measures which will enhance biodiversity in and around the site will be supported.

Proposals must demonstrate that car parking requirements can be accommodated satisfactorily within the immediate surrounds of the buildings or an alternative logical solution is proposed.

### **Conversion of existing agricultural buildings to other uses**

- 4.23 The current **Policy 10** states that “Proposals for the conversion of rural buildings to business and commercial uses will be considered favourably over residential in the first instance.” Whilst the Council still supports this approach, it is recognised that such conversions are not always appropriate and that the current policy document does not provide any guidance on the conversion of existing buildings to residential use, and this has led to a lack of clarity for developers, agents or individuals bringing forward such proposals. It is therefore considered that such a policy should be introduced. It is also considered that there may be occasions where community uses may be acceptable uses of some conversions in order to support the long term maintenance of existing rural communities. Conversion of buildings to tourism uses may also be acceptable. The following policy wording is suggested:

#### **Conversion of Agricultural and Rural Buildings to Business, Commercial, Community or Residential uses**

Outside defined built-up areas and secondary settlements, conversion of agricultural, forestry or other rural buildings to business, commercial, community or residential development will be supported where the following criteria are met:

- a) The buildings have been in use for rural purposes for a period of at least 10 years, and the current use can be proved to be no longer necessary, or would otherwise secure the future of an existing heritage asset;
- b) The existing building is not so derelict as to require substantial reconstruction;
- c) The site is served by an existing metalled road or otherwise suitable access to the local road network;
- d) the proposed conversion is acceptable in its setting by virtue of its siting, form, scale, and existing architectural merit, and it can be demonstrated it would lead to an enhancement of the immediate setting through the architecture, landscape design and materials;
- e) The proposals would not adversely affect the character, appearance or visual amenities and the intrinsic character and beauty of the countryside of the wider area. Measures which will enhance biodiversity in and around the site will be supported.

Proposals for the conversion of rural buildings to business and commercial uses will be considered favourably over residential in the first instance. Community uses will also be considered favourably where it can be demonstrated that they will enhance or maintain the vitality of rural communities.

4.24 In addition, the following supporting text is suggested in relation to this policy

“Horsham District has a rural character, with a large number of farmsteads and other rural activities such as equestrian businesses. Although the stock of buildings which are suitable for conversion to other uses has fallen over time there will still be instances where proposals for the conversion of rural buildings do come forward.

Given that the proposals for development will be in the rural areas of the district it is expected that development may be ‘isolated’ to some extent in that there will be a reliance on the private car to reach most services and facilities. It is therefore considered that any such proposals should be easily accessible by road. The local isolation of the development will also need to be considered – buildings within an existing complex are for example less likely to have an adverse impact on the character of the surrounding landscape.

Given the rural location of these sites, applicants would need to be mindful of the potential impact of any proposal on biodiversity. Rural buildings may for example contain bat roosts or nest habitats for protected species such as barn owls. Applicants should therefore be aware that it may be necessary to undertake an ecological investigation and implement suitable mitigation as well as biodiversity enhancements in accordance with the Council’s biodiversity policies.”

## 5.0 Next Steps

### Commenting on the document

5.1 This document is published for a seven week consultation between Friday 6 April and 25 May 2018 in accordance with regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012. It should be noted that at this stage, **these proposals are for consultation only and do not form Council policy.**

5.2 The Council is seeking views from stakeholders and the general public on the draft policies and proposals in this document and is particularly keen to hear a response to the questions that we have posed throughout the document together with any changes that you would wish to see before the next stage of consultation.

5.3 Comments can be submitted online, via the council's website <https://www.horsham.gov.uk/planningpolicy/planning-policy/current-consultations> by email to [strategic.planning@horsham.gov.uk](mailto:strategic.planning@horsham.gov.uk) or by post to

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

5.4 Representations that are submitted to the Council will be summarised and suggested changes will be considered by the Council. This could include evidence updates or further work on proposed sites or consideration of new land that could be proposed to the Council as part of the consultation.

### Next Steps

5.5 This document forms the first stage in the review of the Horsham District Framework, and in addition to the topics which are addressed in this document, a wide range of other issues will need to be considered, including the development strategy for housing. Over the past year or so, the government has strengthened its commitment to increase the level of housing development that takes place nationally, and the Council has contributed to a number of government consultations on how this may take place. At the current time, the outcomes from these consultations and the full extent of their implications are not yet complete, and it is therefore considered that the full review of housing policies will need to take place following the publication of revised planning guidance on this issue. Given the current uncertainty, together with the work required on the evidence base for this matter, it is anticipated that the next stage of the Local Plan review will be published in 2019 under the Regulation 18 consultation. This documentation will be accompanied by updated evidence base documents including a sustainability appraisal and a habitats regulation assessment. This 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.