Horsham District Council

Horsham District Local Plan Examination

Response to Action Point 15

Matter 2, Issue 4 - Plan Period, Vision, Objectives and the Spatial Strategy- Whether the strategy and overarching policies for growth and change in Horsham Town and Broadbridge Heath are justified, effective, consistent with national policy and positively prepared?

HDC38

Date: January 2025

Contents

Action Point 15: Provide a note on how retail evidence remains robust – including detail on Broadbridge Heath with reference to the Crawley Borough Council retail study.

Horsham District Local Plan Retail Evidence

1. The primary piece of retail evidence is the **Horsham Town Retail and Leisure Study 2017** (**ECO3**), which was produced by consultants, GVA, in order to support the adopted development framework (the **Horsham District Planning Framework HDC05**) and any future review, and to inform a range of plans, programmes and projects in Horsham Town Centre and for out of centre shopping provision at Broadbridge Heath.

2. The broad findings of the study were as follows:

    - Horsham is a strong retail centre, performing well, with a low vacancy rate, attractive environment and a good mix of mainstream, independent, and eating and drinking operators (para 7.13)

    - Key competing town centres are identified to be Crawley (15% market share in study area), Worthing (6.5%), Brighton (5.7%), Haywards Heath (4.6%) and Guildford (4.2%) (in descending order based on their level of influence over shopping patterns within the study area). Future changes should be monitored by planning officers and through regular retail study updates. (para 7.11). While the study (in para 4.4) makes clear it is not possible to rank the centres' sub regional hierarchy, it does provide a sub-regional ranking in Table 4.1.

Table 4.1: Sub-Regional Ranking Venuescore

Centre	Venuescore	Retail Ranking
Brighton	517	7
Guildford	310	32
Crawley	213	76
Chichester	207	83
Worthing	187	104
Horsham	179	118
Dorking	90	307
Haywards Heath	87	322

Source: Javelin Rankings

Figure 1: Sub regional centres hierarchy taken from 2017 Horsham Town Reetail and Leisure Study (Table 4.1 of EC03)

- Horsham will likely retain its position in the sub-regional retail hierarchy, benefitting from click & collect innovations, on-going investment and a strong retail and leisure sector. The role and investment potential/plans in competing centres should continue to be monitored, and whist a number are identified as being large-scale and strategic in nature, there is little in the way of implementation in the short-medium term (1-3/5 years). There are evidently no current barriers to Horsham retaining or improving its positioning over the next few years and a continued pro-active approach will be key (para 7.12)

- Improvements to legibility of town centre and to car parking are required
- Improved linkages between John Lewis and main town centre area are also required (HTC5)
- The Council should plan for the delivery of around 7,500 sqm net of convenience goods floorspace, and 10,700 sqm net of comparison goods floorspace to be delivered up until 2031 (para 7.19)
- Retain key boundaries set with the HDPF's policy map in relation to town centres and town centre uses (HTC3)
- Develop an investment plan and place making strategy to include legibility, public realm and signage improvements (HTC4)

3. The position of the Council is that these remain valid and relevant. While acknowledging the time and events that have passed since the study was conducted, the evidence set out below indicates that Horsham Town has recovered well following Covid-19 and remains a successful town centre. Following the recent acquisition of the main shopping centre in Horsham Town, the real estate investment company involved pointed out that the shopping centre "sits within a growth area, and benefits from a supportive local authority which is committed to retaining Swan Walk as the focus for retailing in the area"[1].

4. Horsham town centre parking data shows the general incline in car park usage (in the form of transactions) since monitoring began in 2020, supporting that general footfall to the town centre is strong, has recovered well following Covid-19, and continues to grow.

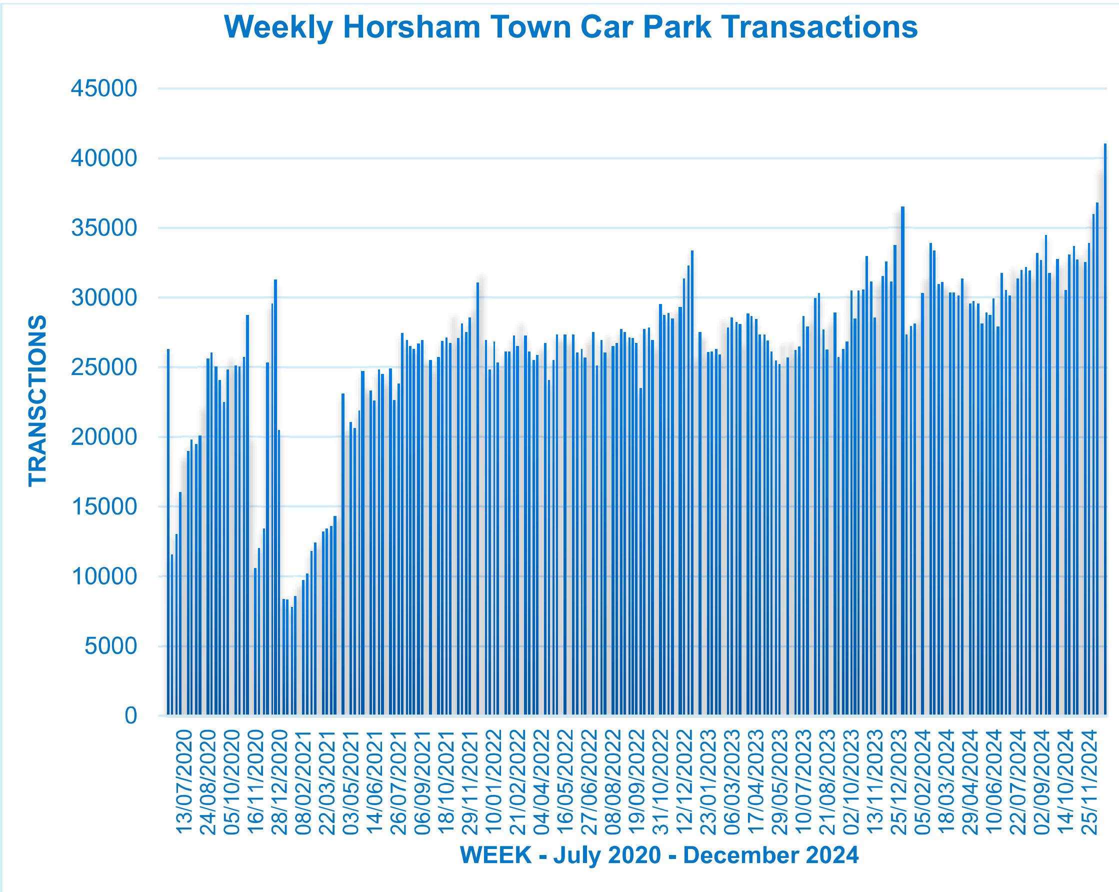

Figure 2: Weekly Horsham Town Car Park Transactions (July 2020 to December 2024)

---

[1] https://www.insidermedia.com/news/south-east/cube-re-acquires-horsham-shopping-centre

5. Data compiled by the Council's Economic Development Officers as part of their monitoring of town and village centre frontages indicated that in January 2024 there was a vacancy rate of 8% in Horsham Town and 6% in other town and village centres across the District. This is compared with a 14% average rate across the UK (17.8% for shopping centres, 13.9% for the high street and 8% for retail parks) according to British Retail Consortium analysis published in July 2023[2].

6. On the basis of the above, the Council considers the evidence base to be up to date, robust and proportionate for the purposes of Local Plan making. The Council does not consider the outputs and recommendations of **EC03** to be out of date. This piece of evidence has informed existing planning policy used in Horsham District which has been functioning well to support Horsham Town and other town and village centres across the District alongside other Council documents and strategies, such as the **Horsham Town Centre Public Realm Strategy and Design Guide**[3] (adopted May 2021) which sets out principles for public realm regeneration of key areas in Horsham Town, including the Bishopric, as recommended in **EC03**, and Council event programmes such as 'Horsham Lates' and 'Sussex Sounds'[4], which promote footfall and support the primacy and vitality of centres in the District.

Retail Impact Assessment Thresholds

7. Nothwithstanding the position that **EC03** remains relevant and that commissioning any update would not be proportionate, the Council is prepared to put forward a main modification to **Policy 5: Broadbridge Heath Quadrant** which removes the reference in criterion 6 to a 1,000sqm retail impact assesement threshold, instead defaulting to a 2,500sqm threshold in line with the NPPF.

Crawley Borough Council Evidence Base

8. Crawley Borough Council produced the **Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment January 2020**[5] document to support the Crawley Borough Council Local Plan.

9. The study defines 12 Survey Area Zones, one of which (Zone 2) covers the Broadbridge Heath Quadrant. The study was based on a survey of households across a number of locations in the study area. The study data included in Appendix C[6] of the report illustrates the relatively low ranking that the area covered by Broadbridge Heath Quadrant has across the Study Area. Specifically, it shows the following;

   - Of all respondents across the study area, 5.7% undertake their main grocery shopping at Tesco Extra, Broadbridge Heath. This is compared with 9.2% who shop within Zone 1A, 11.6% in Zone 1B and 7.7% who undertake their main grocery shopping outside the Study Area. The 5.7% at Tesco Extra, Broadbridge Heath equated to 62 people surveyed. 29 of these respondents whose main grocery shopping was in Broadbridge Heath reside within Zone 12 itself and a further 27 respondents in Zone 5, which covers Horsham Town itself and much of which is within Horsham District, arguably representing more sustainable shopping behaviours than these people travelling elsewhere to shop. Of the respondents in Areas 1, 2, 4, 7 and 6 (the zones between Crawley and Broadbridge Heath Quadrant) only 5 of these answered that they used Tesco Extra, Broadbridge Heath for their main grocery shop.

   - Of the possible reasons for using their main shopping location, 20 of the respondents within Zone 12 answered that Tesco Extra, Broadbridge Heath is *Near to Home*. Again, the Council considers

---

[2] https://brc.org.uk/news/corporate-affairs/britain-loses-6-000-storefronts-in-five-years/
[3] https://www.horsham.gov.uk/__data/assets/pdf_file/0017/123326/Horsham_Town_Centre_Public_Realm_Strategy_-and-_Design_Guide.pdf
[4] https://www.horsham.gov.uk/community/events-in-horsham-district
[5] https://crawley.gov.uk/sites/default/files/documents/PUB354608.pdf
[6] https://crawley.gov.uk/sites/default/files/documents/PUB354609.pdf

that this illustrates the ability of the area to facilitate sustainable shopping behaviours, something Policy 5 seeks to promote.

- No respondents stated that they visited Broadbridge Heath Retail Park for any additional leisure or shopping activities linked with their main shopping trip.

- A relatively small number of respondents across the study area (5, or 1% of all respondents) said they had recently bought larger comparison goods (such as washing machines, computers, etc.) in either Tesco Express, Broadbridge Heath or Broadbridge Heath Retail Park). This was compared with 36% having used Crawley Town Centre or County Oak Retail Park.

- 7.6% of all respondents had used the Broadbridge Heath Retail Park for recent DIY or gardening goods shopping compared with 26% using facilities within Zone 1 itself, which covers Crawley Town Centre and adjacent shopping areas. 89% (47 of 53) of the respondents who answered Broadbridge Heath Retail Park for this question were from Zone 5 or Zone 12 indicating this may have been due to the proximity to their homes' and, again, suggesting the area is well placed to support more sustainable shopping behaviours for comparison retail.

Other Findings of Crawley Evidence of Relevance to Horsham

10. The study also asked respondents which centre they visit most. Unsurprisingly, Crawley was the most popular response (29%) but Horsham was the second most popular at 17%, going some way to support the Council's position that Horsham Town Centre remains successful and is performing well to attract visitors.

11. The study also asked respondents what they like most about Horsham town centre, with the five most popular responses ranked as follows:

- Close to home 38.5%
- Choice and range of shops 20%
- Environmental quality of centre 13.1%
- Nothing in particular 4.7%
- Choice of leisure facilities 4%

12. The Crawley evidence base indicates that Crawley remains a higher order town centre than Horsham, and that a specific policy requirement in Policy 5 for a retail impact assessment to include Crawley centres would not be proportionate where a proposal has demonstrated no detrimental impact on Horsham town. It also contains data which supports **EC03** in respect of the continuing health and success of Horsham town in attracting footfall.