

Ref 35

Dear Sir/Madam,

**Henfield Neighbourhood Plan (HNP) Regulation 16 Consultation
Site F - Land at Edburton Contractors & Sweeptech Environmental Services, The Old
Brickworks, Shoreham Road, Small Dole.
Policies 3.1 (3.1.1 to 3.1.5) and 3.2**

Introduction

We write on behalf of our clients Sweeptech Environmental Services & Edburton Contractors in relation to the above, and in connection with the proposed site allocation for employment use at Land north of The Old Brickworks (Site F).

We write to confirm our full **support** for this allocation and the proposed policy, but **with suggested modifications**. We also support the neighbouring proposed allocations E and G.

Our clients control land to the south (The Old Brickworks on Policy Map 2a) and to the west of sites F and G.

Proposal

The site (F) is located to the north of the established commercial and employment site of Sweeptech Environmental Services and Edburton Contractors. The surrounding uses are also primarily commercial, including Henfield Business Park to the east, which is located opposite the site. The surrounding area is therefore predominantly commercial / employment, and as such it is considered that the proposed allocation (along with adjacent sites E and G) is a suitable location for a key sustainable employment site in accordance with HDC policy.

The site is capable of accommodating the erection of commercial units, the exact mix and number is to be determined through pre-application discussions with the Council (which have already commenced), but could include a mix of smaller and larger units.

Our clients also intend to expand the commercial/waste facility in the southern part of the existing Old Brickworks site (shown in blue on Policy Map 2).

Paragraph 5.40 of the HNP is noted and my clients would be willing to work with neighbouring site owners to facilitate a joint access if deemed necessary/desirable. The existing site access to the Old Brickworks site is not ideal and if each of the three proposed sites adds an individual access that would result in four points of access on the western side of the Shoreham Road, all in close proximity. We have produced a plan (attached) showing how a single point of access could work and this would facilitate the closing of the existing Old Brickworks access. The resulting layout would provide a better internal arrangement than currently exists by providing a new internal access to Edburton Contractors and Sweeptech (on the existing Old Brickworks site). An internal access road to the west, would also help maximise the commercial floorspace provision on sites E, F and G.

The modifications required to the plan would be to increase the extent of the allocated land to the west of sites F and G (and the Old Brickworks) in order to accommodate the access road, and a modest addition of commercial land to the west of site F, as drawn.

Planning Policy Context

NPPF

National Planning policy set out the Governments strategy for delivering economic growth, which is one of the key policies in the NPPF. Paragraphs 80-82 of the NPPF states that "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt." It goes on to state that "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."

Horsham District Planning Framework (HDPF)

HDPF policy 5 sets out the economic strategy and acknowledges that there are a number of economic issues that Policy 7 seeks to address, such as a lack of employment land in the District and the fact that a lot of the existing building stock does not meet the requirements of existing businesses or attract new businesses. In addition there is a need for existing businesses to grow, expand and change in order to meet modern business demands. Policy 7 of the HDPF (Economic Growth) seeks to provide sustainable employment development in the district, this will be done by amongst other things, the redevelopment, regeneration, intensification and smart growth of existing employment sites.

The Inspector's report on the HDPF recommended adoption of the Plan but determined that an early review of the HDPF would be necessary in order to ensure that additional allocations could be considered to ensure (amongst other things) that employment growth is not constrained. We note that Horsham District Council have recently begun their required review of the existing HDPF. The first stage of this review was the Issues and Options Paper (published April 2018), this document identified and considered a potential locational strategy for economic growth, and also included sites which are considered to have the potential for allocation for employment use. The Issues and Options paper considered that it would not be unreasonable to plan for an estimated 27.6 hectares of additional commercial land in the period up to 2036. The document made it clear that further updates to the evidence base would be needed to support the Local Plan review.

Since the adoption of the HDPF the Council have produced 'The Horsham District Economic Strategy 2017 to 2027' document, which sets out a set of economic priorities for the District, and confirms the Council's commitment to supporting business growth in the District. It is noted that whilst the Issues and Options document proposes a revised strategy for economic growth, it continues to use a number of the existing principles and policies that are already contained in the HDPF, as these are considered by the Council to be working well. However, the Issues and Options document at paragraph 2.5 states that the current evidence shows that there are a number of issues affecting economic growth in the District, one of these is identified as a limited supply of office, industrial and warehouse facilities. This is thought to be due to a loss of existing stock to alternative uses, a modest increase in demand and a limited level of new development coming forward.

Need for Commercial / Employment land in the District

The Council's Economic Strategy (2017 – 2027) highlights the Council's priorities, and also acknowledges that there is a shortage of commercial space in the District and a loss of existing businesses due to the shortage in commercial space and outdated employment accommodation. The Employment Floorspace Review (EFR) which was undertaken by Crickmays in 2016 advised that there is a limited supply of space in both the office and industrial / warehouse sector compared with past years. It is clear therefore that there is a need for the Council to provide additional employment land in the District. Without this additional employment land there is a risk that companies could move away from the District if their need to expand is made impossible by the lack of suitable premises.

The Council is rightly concerned that without further employment growth a 'dormitory district' could occur in Horsham. There is a danger that if this occurs it will have an impact on the ability to support the current offerings within the towns and villages of the District. We agree with this concern and are of the view that this is likely to take place without the creation of additional employment land and the improvement or redevelopment of existing sites.

In addition, there are a number of commercial / employment sites in Henfield which are considered to be inappropriately located, such as The Bus Station, Station Road; Vinalls Business Centre and NR Motorworks, Nep Town Road; and, The Post Office & Library Car Park, High Street. These sites have been allocated in the Neighbourhood Plan for residential development, acknowledging that the current locations of these commercial units are not in keeping, and are sometimes in conflict with the surrounding residential use. Our clients have been contacted by local companies, in particular those who have had their existing sites identified in the local plan for residential development, to enquire if there is any availability on their site to relocate.

Our clients and their retained agents (Crickmay) have advised that there is a constant demand for units that they cannot currently satisfy, and there is an associated demand to establish jobs in this area that cannot currently be supported.

There is also growing pressure for Sweeptech and Edburton to expand on the site or relocate other operations if planning is not forthcoming in the immediate future.

Conclusion

Given the comments made above we fully endorse and support the HNP policies for additional commercial space on sites; E, F and G. We commend the Parish Council for taking a positive approach within the NP and seeking to allocate land for both employment and housing purposes.

We recommend that the Plan be modified through the inclusion of land to the west of site F and G and the Old Brickworks to facilitate limited additional employment land west of site F and an access road west of site F, G and the Old Brickworks.

Please do not hesitate to contact us for any clarification, additional information as we would be pleased to assist.

Kind regards,

DH Stallard