



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 2: Plan Period, Vision, Objectives and the
Spatial Strategy

Issue 4

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Issue: 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?

Question 1: Is Strategic Policy 4: Horsham Town sound?

1. As is set out in the response to **Matter 2, Issues 1, 2, and 3**, the spatial vision and development strategy for the District is focused on a continuation of the existing settlement pattern of the District, with most growth focused in / around Horsham, as the main town of the District. (**Policy 2: Settlement Hierarchy**). Policy 4 provides further detail to help promote the prosperity of the town and strengthen its role as the primary economic and cultural centre in the District, and is supportive of growth that furthers this aim. It is therefore considered to be **Positively Prepared**.
2. The NPPF (Chapter 7), recognises that planning policies should support the role of town centres. This policy (together with Policies 35 and 36) is therefore consistent with the approach of identification of a hierarchy of town centres, and the identification of uses in these areas. (NPPF paragraphs 86 -91). The Policy follows Planning Guidance (Reference ID: 2b-002-20190722) by setting out a vision and strategy for the Town Centre through the development plan. The policy is therefore considered to be **consistent with National Policy**.
3. The policy is a continuation of the **Horsham District Planning Framework (2015) Strategic Policy 5: Horsham Town** which was previously found to be sound and effective as a mechanism to maintain and enhance the role of Horsham town, but has been reviewed in light of up to date evidence to ensure that this remains effective. The **Northern West Sussex Economic Growth Assessment (EC02)** (jointly commissioned with Crawley Borough Council and Mid Sussex District Council) finds that the majority of jobs in the District (37.8%) lie within Horsham Town. The policy encourages positive measures which enhance Horsham Town as the primary centre of the district. **Horsham Town Retail and Leisure Study (EC03)** highlighted in paragraph 7.8 the importance of Horsham to be well positioned to be able to adapt to on-going changes in the retail and leisure sector over the development plan period and to reaffirm unique selling points which differentiates the retail offer from other centres, The policy is therefore considered to be **Justified and Effective**.

a) Is the relationship with the economic development policies clear?

4. **Paragraph 1.6** of the Plan makes clear that each Local Plan policy is not to be read in isolation and that other relevant policies will apply. The policy is consistent with **Strategic Policies 35 and 36** which follow a Town Centre First approach for commercial, retail, recreation, leisure and entertainment uses. It is also consistent with **Strategic Policies 29 and 30** which respectively direct office provision to within settlement centres and allocates five Key Employment Areas within Horsham Town. The supporting text to **Strategic Policy 29 (paragraphs 9.13 and 9.14)** makes clear that Horsham Town accommodates the majority of jobs in the District (37.8% - all sectors) as evidenced by **Table 4.5** of the **Northern West Sussex Economic Growth Assessment (EC02)**, including just over a half the District's office floorspace and the majority cluster of industrial and warehousing floorspace.

b) Is the geographical application of this policy clear having regard to the town centre, north of the town, the allocations or locations within or outside the built up area boundary?

5. The Policy states that it applies to development within the built up area boundary of Horsham Town. **Paragraph 1.6 of the Local Plan** makes clear that each Local Plan policy is not to be read in isolation

and that other relevant policies will apply. Therefore, for the defined town centre, **Strategic Policy 35** and **Strategic Policy 36** will also apply. The principle of development outside built-up area boundaries is set out in **Policy 3: Settlement Expansion**, and specific provision for economic / retail growth is also provided for in any relevant policy allocation to ensure that the needs of these new developments are provided for, and that they come forward in a manner that is consistent with the settlement hierarchy. This includes allocations relating to Horsham town.

Question 2: Is Strategic Policy 5: Broadbridge Heath Quadrant sound?

6. Strategic Policy 5: Broadbridge Heath Quadrant identifies an area adjacent to, but outside Horsham Town which is suitable for redevelopment. The policy is intended to reflect the opportunity for redevelopment to both meet local needs and to complement Horsham Town itself in order to meet the wider needs of Horsham District.
7. The policy is sound. It is:

Positively prepared: the policy provides a clear, positive context in which sustainable redevelopment of a well-located brownfield site should come forward in order to meet the needs of both the local community and the wider district, while supporting the role, and complementing the offer, of Horsham Town as the main town centre in the District;

Justified: the approach takes account of the settlement hierarchy, town centre first principles, and development characteristics necessary to deliver a well-designed, sustainable scheme which accords with the findings of the **Horsham Town Centre Retail and Leisure Study 2017 (EC01)** in respect of the need to carefully manage growth and redevelopment of the area to both maximise the area's potential and to support Horsham Town (Para 7.7). The policy follows an approach already taken in the Horsham District Planning Framework (Strategic Policy 6: Broadbridge Heath Quadrant) which has been used successfully by applicants and decision-makers on the site, demonstrating the policy itself is justified;

Effective: the policy is deliverable in its current form and builds on redevelopment on parts of the quadrant which have taken place under the existing policy; The quadrant is located within Broadbridge Heath, which is classified as a Small Town or Larger Village according to Strategic Policy 2: Development Hierarchy. This means it has a good range of services and facilities and can act as a hub for other towns and villages, but also recognises there remains a reliance on larger settlements like Horsham Town to meet some needs. The quadrant can, therefore, be expected to accommodate a larger scale of growth than other settlements in the District and the policy recognises that the quadrant has a unique opportunity, due to its location, to serve both the local community and the wider district, while complimenting Horsham Town and helping secure its vitality and vibrancy, and,

Consistent with national policy: the policy has regard to national policy and guidance on the use of brownfield land (NPPF paras 119 and 120). NPPF para 88 states that when considering out of centre proposals preference should be given to accessible sites, well connected to the town centre, which Broadbridge Heath Quadrant is considered to be. In line with NPPF para 86e), the policy allows for development which complements Horsham Town and the viability of the local area, and District as a whole in an area with good links to Horsham town centre itself.

- c) [Is the relationship with the economic development policies clear? Is the threshold for retail impact assessment justified and is the policy robust with regard to its approach to impact on Crawley Town Centre?](#)

8. The economic development policies of relevance to Policy 5 are **Strategic Policies 35 and 36:** Town Centre Hierarchy and Town Centre Uses. These policies are written on the basis that paragraph 86 of

the NPPF expects town centre uses to be based in defined town centres according to a hierarchy in the first instance, in order to promote their primacy and long-term success. Paragraph 86.e) of the NPPF recognises, however, that there may be instances where edge of centre or out of centre locations can be identified for some town centre uses to a limited extent.

9. Policy 35 recognises Broadbridge Heath Quadrant as the only out of centre location in Horsham District where retail uses would be considered acceptable. It defers to Policy 5 in respect of detail but does make explicit the expectation that development in line with Policy 5 must enhance the retail offer and meet community requirements when considered alongside Policy 35. In combination, the relevant economic development policies and Policy 5 provide sufficient protection for, and clarity around, Horsham town's role while enabling redevelopment of an identified out of town location.
10. In order to remove any possible ambiguity around the requirement for retail impact assessments, a main modification is proposed to subsection 6 of Policy 5 as outlined by **SM07** in the **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024** document submitted with this statement, which makes clear that a 1,000sqm threshold applies to the Broadbridge Heath Quadrant and that applicants and decision makers should use this threshold for the site notwithstanding the alternative threshold set in Policy 35 for other out- or edge of town proposals.
11. The policy requirement for a 1,000sqm retail impact assessment threshold, lower than the nationally prescribed 2,500sqm threshold set out in paragraph 90 of the NPPF, is in the context of Horsham Town, the District's primary town centre, which is also adjacent to the quadrant, having an average retail unit size below the 2,500sqm level. Any proposal for uses above 1,000sqm will be in direct competition with the town centre offer. While the **Horsham Town Centre Retail and Leisure Study 2017 (EC01)** recommends a lower threshold for out- and edge-of-centre proposal for town centre uses, Policy 5 itself encourages uses which are complementary to the offer in Horsham Town itself, and so a larger floorspace is considered appropriate providing proposals meet all other policy requirements.
12. The representation made by Crawley Borough Council at Regulation 19 stage (response ref: #1194005¹) requested that Policy 5 should be amended to include retail impact assessment of any proposal on Crawley Town Centre. This has not been proposed as a modification because it is not considered to be a proportionate or justified requirement on that basis that Horsham Town is located between Broadbridge Heath Quadrant and Crawley Borough, and so an acceptable impact on Horsham Town is unlikely to be found to have an unacceptable level of impact on Crawley Borough to justify more stringent impact testing. Figure 6.4 (page 29) of the **Horsham Town Centre Retail and Leisure Study 2017 (EC01)** indicates the convenience goods market share as being centered on Horsham District and postcodes to the north and the west, not Crawley.

d) [Is the geographical application of this policy clear?](#)

13. The area the policy applies to is clearly defined on the Local Plan Policies Map (Broadbridge Heath Opportunity Area). It includes the area directly to the south west of Farthings Hill Interchange, with the A24 to the east and Broadbridge Way to the north, and includes the area incorporating The Bridge Leisure Centre to the south. While the policy does not require development of the area as a whole, the intention is that any development within the defined area will improve linkages between the Wickhurst Green development and access routes to Horsham Town to the north and facilities in Broadbridge Heath to the north therefore the policy applies to the entire area indicated on the policy map.

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https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1194005

14. The quadrant itself is located in Broadbridge Heath, classed as a Small Town and Larger Village according to the Strategic Policy 2: Development Hierarchy, and adjacent to Horsham Town and the quadrant's location means it plays a more strategic, district wide role as well as meeting local needs.

e) [Is it necessary to reference or strengthen the reference to specific development constraints such as those related to landscape, transport or the environment?](#)

15. The policy makes reference to the need for development on the site to improve accessibility and connectivity (criteria 2 and 4) to enhanced travel and transport options (criteria 4, 9 and 10). It requires high standards of landscape design (criterion 4) and environmental protections are considered under criteria 3, 4 and 9 and 10 in respect of transport).

16. Any proposal for development would also need to comply with national policy, and with other policies in the Local Plan including those relating to transport (in particular Strategic Policy 24: Sustainable Transport), landscape and the environment (Strategic Policy 11: Environmental Protection, Strategic Policy 12: Air Quality, Strategic Policy 13: The Natural Environment and Landscape Character and Strategic Policy 17: Green Infrastructure and Biodiversity) and environmental protection (Strategic Policy 6: Climate Change, Strategic Policy 8: Sustainable Design and Construction and Strategic Policy 10: Flooding). As already outlined in this response, the Plan should be read as a whole, and it is not considered necessary to repeat requirements outlined in other policies which would also form part of the decision-making process on any development proposal.