



<b>Project</b>	Horsham District Council Local Plan 2023-2040 Examination
<b>Document</b>	<b>Matter 7 Hearing Statement</b> – Plymouth Brethren Christian Church

## Matter 7 – Economic Development

Matter 7, Issue 2 – Whether the other economic development policies are justified, effective, consistent with national policy and positively prepared?

*Q1. Is Policy 31: Rural Economic Development sound?*

*a) Is the geographical application of the policy or individual criterion clear? Is it clear whether proposals must comply with all criteria? How does criterion 2 relate to sites allocated in the Plan?*

*b) How has this policy taken into account allocations in Neighbourhood Plans?*

Previous representations made at Reg 18 and Reg 19 stages of the Plan (and indeed on the 2015 HDPF) on behalf of the Plymouth Brethren Christian Church have highlighted the **significant need for places of worship** of the faith group in the Horsham community (plus other community needs).

The Church are unable to compete for land or buildings within settlement boundaries for places of worship/community use due to the residential value that brownfield and town/village centre sites carry for residential redevelopment. It is crucial that the Church is able to identify existing buildings outside of settlement boundaries or rural buildings that may be suitable for conversion and reuse use as places of worship.

The Church have successfully converted a rural stable building for use as a place of worship in the District, near Southwater (DC/13/2344) which was carried out within the parameters of Horsham Development Plan policy at that time. Amendments to the draft Local Plan will remove the ability for faith groups or other community groups to positively reuse rural buildings in favour of residential reuse, which does not comply with national planning policy and frankly, is fundamentally unfair.

Main Modifications carried out by HDC (Schedule of Suggested Modifications to the Regulation 19 Local Plan Version 2: November 2024) state at Chapter 9 HM044 (Policy 32) that Policy 31: Rural Economic Development *addresses conversion of rural buildings to economic / enterprise uses*, but this does not allow for community uses.

Section 8 of the NPPF refers to 'promoting healthy and safe communities' and states at paragraph 93 that *'to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

*a) plan positively for the provision and use of shared spaces, **community facilities** (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and **places of worship**) and other local services to enhance the sustainability of communities and residential environments;'*

Is it fundamentally clear that **community uses** are **not facilitated** under Policy 31 which relates to **rural economic development and enterprise** only.

The Council's approach has done precisely **the opposite** of national policy requirements and the opposite of preceding HDPF and reg 18 policies in the District by removing the ability for the church to obtain planning permission for the conversion of buildings outside of settlement boundaries. The Council have now made it **more difficult** for the church to identify buildings for community use and worship through the amendments to Policy 32 (to remove community uses as an appropriate reuse of rural buildings).



ECE Planning

The suggested Policy framework for rural buildings within Policies 31 and 32 of the draft Plan fail a community organisation that the Council are specifically required '**plan positively**' for.

**Q2. Is Policy 32: Conversion of Agricultural and Rural Building to Commercial, Community and Residential Uses sound?**

**a) Is this policy only concerned with conversion to residential use?**

The National Planning Policy Framework (NPPF) at Section 8 refers to 'promoting healthy and safe communities' and states at paragraph 93 that '*to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- a) *plan positively for the provision and use of shared spaces, **community facilities** (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and **places of worship**) and other local services to enhance the sustainability of communities and residential environments;'*

The Main Modifications carried out by HDC (Schedule of Suggested Modifications to the Regulation 19 Local Plan Version 2: November 2024) state at Chapter 9 HM044 (Policy 32) have **immediately deleted community and commercial interests** from their reuse of rural buildings policy, in favour of residential. This has, at a stroke, fundamentally disadvantaged community and faith groups from fairly competing for available rural buildings for reuse for community uses or worship.

The deletion of commercial and community uses from Policy 32 is unexplained and unjustified. As above it has a significant detrimental effect on the Church but also other community organisations, in favour of residential uses.

**b) Is the geographical application of this policy or individual criterion clear and how does the policy relate to sites allocated in the Plan?**

The individual criteria are clear in that they relate only to residential as drafted, but can also apply to the reuse of rural buildings with minor text amendments (also set out in our Reg 19 Representations) as follows:

**Draft Strategic Policy 32: Conversion of Agricultural and Rural Buildings to Commercial, Community & Residential Uses**

*'Outside defined built-up areas and secondary settlements, conversion of redundant agricultural and forestry buildings to **community, commercial or should such uses not be feasible**, residential use, will be supported where all of the following criteria are met:'*

This would facilitate a more 'sequential' approach to the reuse of rural buildings which allows for consideration of community and commercial uses first before residential, an approach which is considered more compliant with national planning policy, current HDPF policy and a fairer approach for community users.

Policy 32 and the recent modifications to it are considered unsound and the lack of justification for making the needs of community organisations and faith groups more difficult is concerning. Notably, draft Policy 9 from the Horsham Reg 18 stage (March 2020) contained a more supportive and positive draft policy framework for communities which is copied below:

*Policy 9 (Conversion of Agricultural and Rural Buildings to*

*Commercial, Community or Residential Uses):*

*'Outside defined built-up areas and secondary settlements, conversion of agricultural, forestry or other rural buildings to commercial, community or up to 5 residential units, will be supported where the following criteria are met:*

- 1. The buildings have been in use for commercial purposes for at least 10 years and the current use can be proven to be no longer necessary, or would otherwise secure the future of an existing heritage asset;*
  - 2. The existing building is not so derelict as to require substantial reconstruction;*
  - 3. The site is served by an existing metalled road or other suitable access to the local road network;*
  - 4. It can be demonstrated that every reasonable attempt has been made to secure a commercial use of the building in the first instance via active marketing for a minimum period of 12 months. Active marketing will be expected to cover a period of at least a year with written confirmation from the commercial agent(s) regarding the redundancy and lack of viability of both the premises and site for commercial use;*
  - 5. 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;*
  - 6. 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 that will enhance biodiversity in and around the site will be supported.*
- 7. Community uses will be considered favourably where it can be demonstrated that they will enhance or maintain the vitality of rural communities.'***

For clarity, the Church do not support the inclusion of '*..up to 5 residential units*' in the Reg 18 draft policy above but consider that overall the previous draft policy was considerably more helpful towards the needs of faith groups and community organisations that have no choice but to pursue rural buildings outside of settlement boundaries due to the lack of availability of sites within towns and villages.