

Horsham District Council 2024-2040 Local Plan Examination MIQs

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

Harwoods Ltd: Five Oaks site, Billingshurst

Report date: November 2024

Prepared for:
Harwoods Limited

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Where great relationships yield the best property outcomes

Matter 7: Issue 2:

Whether the other economic development policies are justified, effective, consistent with national policy and positively prepared?

Q2. Is Strategic Policy 30 Enhancing Existing Employment sound? a) The Policies Map identifies “Key Employment Areas” and “Sites for Employment” and the policy also refers to “Other Existing Employment Sites” Is it clear which type of sites each criterion is applicable to? b) Should criteria 1 also refer to intensification? c) Does criterion 1 b) require effects not caused by a development proposal to be mitigated, if so, is this consistent with national policy? d) Are there potentially other impacts which should be considered which are not covered by criterion 1 c) and is the policy effective in this regard? e) Is the geographical application of this policy on the submission Policies Map accurate? f) Are the requirements set out in criterion 7 justified and effective?

As an existing employment site **Strategic Policy 30: Enhancing Existing Employment** is relevant for our clients site at Five Oaks. However, the policy states this is in relation to **(B2, B8 and E(g) class uses)**. As sui generis use Harwoods have previously sought clarification whether this policy and its criteria are appropriate for Development Management purposes.

The policy appears otherwise to support proposals for the upgrading and refurbishment of sites for more employment development. However under **Other Existing Employment Sites** criteria 5 states *“Employment sites and premises outside Key Employment Areas are protected for business, manufacturing, storage and distribution uses (B2, B8 and E(g) Use Classes) and appropriate sui generis uses* “this could be a restriction on use of PDL land such as our clients site.

Criteria 7 states *“Proposals for other uses will only be supported where it is demonstrated that both the premises and site are no longer needed and are no longer viable for employment use. An assessment of these should be submitted and must demonstrate: a) Evidence of active marketing over the period of at*

least a year, supported by i. evidence of the condition of the estate and local economic market within the terms of sale and, where applicable, rent; and ii. written confirmation from the commercial agent(s) regarding the redundancy and lack of viability of both the premises and site for employment or a financial appraisal demonstrating any employment use is unviable; and b) Where relevant, vacancy, including the reasons for vacancy and the length of time vacant.

This is extremely onerous when site owners have to demonstrate such significant evidence to support an application and more flexibility should be written into the policy to support the redevelopment of sites in a sustainable location, and therefore we do not consider that this policy is sound.