
Examination Statement

Land at South West of Hop Oast Roundabout

Christ's Hospital Foundation Representation Number 1196913

Horsham District Council – Local Plan 2023 - 2040

Examination in Public

Matter 7 – Economic Development

Contents

| | |
|---|----------|
| 1. Introduction | 1 |
| 2. Response to the Inspector's Questions | 3 |
| 3. Conclusion | 6 |

1. Introduction

- 1.1. This Examination Statement is submitted by Savills, on behalf of Christ's Hospital Foundation (CHF), in response to Matter 7 – Economic Development and to support the Employment Site Allocation Land South West of Hop Oast Roundabout (draft allocation EM4).
- 1.2. All Local Plan policies referred to in this statement are in relation to the submission version of the Horsham District Local Plan (HDLP) and are therefore in draft form at this stage.

About Christ's Hospital Foundation

- 1.3. CHF is a registered charity. The principal objective of CHF is to aid the advancement of education for children, principally for the benefit of those who have social, financial and other specific needs. The assets and endowments of CHF are therefore used to support more than 600 bursary places at the school. The ability of CHF to meet the financial needs of the school depends critically on significant funding to grow the endowment and increase investment returns.

Executive Summary

- 1.4. Prior to the submission of the Local Plan by Horsham District Council (HDC) to the Planning Inspectorate for examination, CHF and their consultant team have participated in the formal consultations of the Local Plan at the Regulation 18 stage in March 2020 and May 2020 (additional information submission) and to the Regulation 19 stage in March 2024. In addition, Land South West of Hop Oast Roundabout (the Site), which is owned by CHF, has been submitted to HDC's Call for Sites process for consideration for employment development.
- 1.5. The Site has been included in the submission version of the Horsham District Local Plan (HDLP) as an Employment Site Allocation (draft allocation EM4) within Strategic Policy 29: New Employment. The policy sets out the criterion that must be met as part of any future proposals for the allocated employment sites and provides indicative employment floorspace capacity in line with Use Classes B2/B8 and E(g). The Site is considered to be capable of delivering 1ha of allocated land for employment use which equates to circa 3,000sqm in total for B2, B8 and ancillary office / E(g) uses.

- 1.6. The Site has also been subject to a pre-application enquiry to HDC in September 2018. The pre-application proposal was for the redevelopment of the Site to provide 3,000sqm of commercial space comprising B8, B2 and E(g) uses, distributed across 7 commercial units. In order to support the pre-application enquiry a number of technical studies were undertaken. They were then updated for the Regulation 18 Consultation in 2020 and re-submitted for the Regulation 19 Consultation in 2024.
- 1.7. CHF look forward to working with HDC to bring forward an appropriate strategy for the development of Land South West of Hop Oast Roundabout to provide new employment space within the District.

2. Response to the Inspectors Questions

Matter 7 – Economic Development

ISSUE 1: *Whether the approach to employment land and supply is justified, effective, consistent with national policy and positively prepared?*

Q.1 Is Strategic Policy 29: New Employment sound?

a) *What is the overall employment land requirement (hectares and floorspace) over the plan period, is this justified and effective, and should this be more clearly specified in the Plan?*

2.1. This question will be addressed by HDC and does not require input from CHF as the landowner.

b) *What is the total employment land supply (hectares and floorspace) over the plan period including sites allocated in the Plan, is this justified and effective and should this be more clearly specified in the Plan?*

2.2. This question will be addressed by HDC and does not require any comments from CHF.

c) *Are the overall employment land requirements and supply provided by the Plan justified and effective? What is the evidence that the employment supply will be delivered within the plan period and that the employment requirement will be met?*

2.3. CHF is committed to the delivery of the Site (EM4) within the Plan Period. This commitment is reflected in the previous pre-application and local plan engagement that has taken place with HDC. A range of technical documents to demonstrate the deliverability of the Site were prepared to support the pre-application discussions in 2018 including a Stage 1 Road Safety Audit and indicative Site Plan. Therefore the structure for a future planning application has been prepared which will help to reduce the time required to reach the submission stage.

d) *Is it clear whether proposals must meet all criterion 1-10? Is the detailed wording of each of these criteria effective?*

2.4. Strategic Policy 29 prefaces criterion 1-10 by stating '*where appropriate in scale, design and location*'. It may be beneficial to separate the use class specific criterion from the more general requirements in relation to economic growth.

e) Are allocations EM1-EM4 soundly based, with particular regard to the mix of uses and constraints identified?

2.5. CHF does not wish to comment on allocations EM1-EM3. CHF has previously commissioned a range of technical work to demonstrate the deliverability of the Site (EM4). The technical assessments have helped to inform the uses identified for the Site in Table 6 of Strategic Policy 29. Therefore Site EM4 is sound and will support the indicative employment floorspace, alongside the consideration of any potential impacts from surface water and waste water on the Arun SSSI.

ISSUE 2: *Whether the other economic development policies are justified, effective, consistent with national policy and positively prepared?*

Q.1 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?*

2.6. As highlighted in the representations to the Regulation 19 consultation, CHF is supportive of Policy 31 on the basis that it will help to ensure rural land plays a role in economic development within the District and outside of the built-up area boundaries.

2.7. It is unclear whether criterion 3.b) of Policy 31 refers to the Strategic Policy 17 requirement of at least 12% or whether rural economic development proposals only need to provide a more general biodiversity net gain (BNG) due to the constraints within rural locations. The viability of rural economic development will be significantly impacted if a 12% BNG expectation is set. CHF feel that the 10% requirement set out in national legislation should be the standard, particularly for smaller sites.

2.8. Further clarification as to whether some of the criterion set out in Strategic Policy 29 are applicable to Policy 31 would be beneficial. Such as the support for green industries and social / community enterprises (criterion 5). If criterion 3(b) is simply repeating the intention of other policies, this should not be necessary.

Q.2 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?*

- 2.9. Examination document SD14 – HDC Schedule of Suggested Modifications proposes the deletion of Commercial and Community in the policy title. This will help to clarify that the policy only relates to the conversion of agricultural and rural buildings to residential uses.
- 2.10. It is unclear whether criterion 6.b) of Policy 32 refers to the Strategic Policy 17 requirement of at least 12% or whether rural building conversions to residential use need to provide a biodiversity net gain (BNG) more generally. CHF feel that the 10% requirement set out in national legislation should be the standard, particularly for smaller sites.

3. Conclusion

- 3.1. This Examination Statement has been prepared by Savills, on behalf of Christ's Hospital Foundation (CHF). The Examination Statement provides a response to the Inspector's Issues and Questions raised under Matter 7 (Economic Development) that are relevant for CHF's land interests and role as a charitable institution and school.

Andrew Watson
Director



Hannah Keyte
Graduate Planner

