

The Stanley Building, 7 Pancras
Square, London, N1C 4AG
mp@powerhausconsultancy.co.uk
www.powerhausconsultancy.co.uk



PowerHaus
Consultancy

Examination of the Horsham Local Plan 2023-2040
Representer: Verve Investments Ltd
Contact: Ms Mary Power
Agent Organisation (if applicable): PowerHaus Consultancy
Representation Number(s): 1194247 1194250

Response to Inspectors Matters, Issues and Questions
MATTER 8 – HOUSING

MATTER 8, Issue 1 – Whether the housing requirement is justified, effective, consistent with national policy and positively prepared?

Q1. Is Strategic Policy 37: Housing Provision sound? a) Is the requirement for 13,212 homes between 2023 and 2040, below the local housing need for the area as determined by the standard method justified? Is it clear how the figure has been calculated and should this be explained more clearly in the justification text?

Verve is concerned that with the Council not meeting its five-year housing land supply in the first five years and with the low delivery of housing on the strategic sites, that the under delivery could be amplified for the subsequent five-year periods. There are sites that could be allocated and delivered in the first five-year period that would address the shortfall such as the East land at Graylands Estate (SHELAA Ref number SA363 – rejected against the Ecology evidence submitted with representations), which would also contribute 10% of housing provided on sites of less than 1hectare, the small sites requirement of the NPPF para 69a.

b) Would the adverse impacts of the Plan not providing for objectively assessed housing needs significantly and demonstrably outweigh the benefits of doing so when assessed against the policies in the NPPF taken as a whole? Is the overall housing requirement justified?

There appears to be no evidence that there are benefits in not meeting the District's housing requirements. Failure to meet the housing requirements in the first five year period is therefore not justified.

Issue 2 – Whether the overall housing land supply and site selection process is justified, effective, consistent with national policy and positively prepared?

Q1. Were the proposed housing allocations selected on the basis of an understanding of what land is suitable, available and achievable for housing in the plan area using an appropriate and proportionate methodology, and are there clear reasons why other land which has not been allocated has been discounted?

Verve considers that the Council has not taken into consideration the evidence some representors submitted with its Regulation 18 and 19 Consultation submissions, which quantify and demonstrate that there are no obstacles to the delivery of potential housing sites (such as the East land at Graylands Estate (SHELAA Ref number SA363) – rejected against the Ecology evidence submitted with representations) and demonstrate that the site is suitable, available and achievable for housing. Even at Regulation 19 stage a further masterplan was submitted with Verve's representations to demonstrate a potential mixed-use allocation for the East land at Grayland's Estate (attached for convenience). The use of such land integrated into an existing mixed employment and residential estate just to the north-east of the North Horsham Strategic allocation, is a sustainable solution to the interim five years housing and employment needs required for the District.

The masterplan for both the West and East Graylands Estate land was submitted with the Regulation 19 submission to ensure that it was clear how the Graylands Estate was currently functioning with a clear

residential hub and the remainder in employment use. It was prepared (again at cost) to assist with clarification of the site's existing uses to address the comments and conclusions in the SHELAA Ref number:SA363 assessment that:

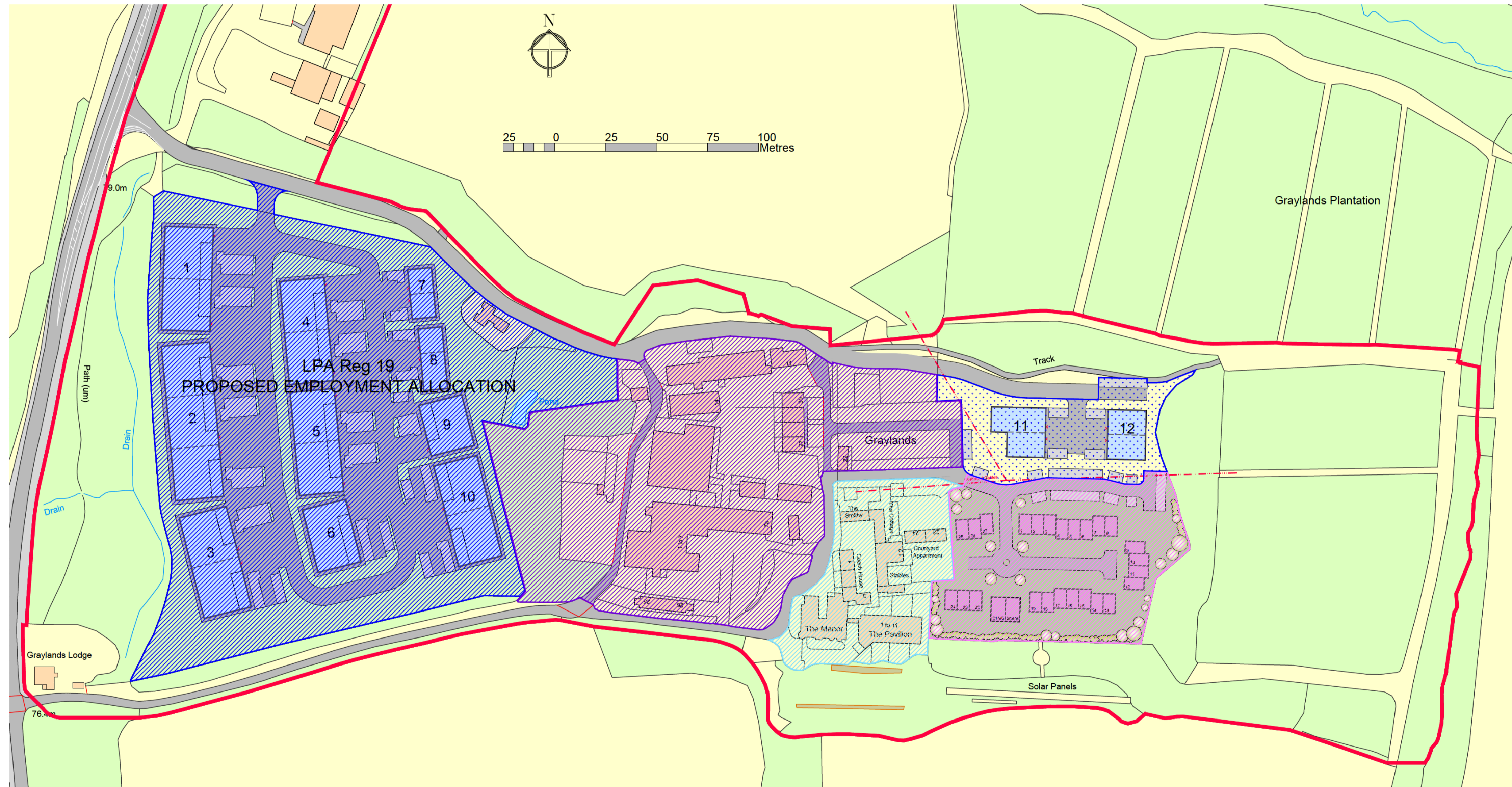
“Given the existing employment use on the site, residential development around this site could lead to noise or lighting impacts from the current uses from new residents.”

The land to the East of Graylands Estate would also contribute to the Plan accommodating at least 10% of the housing requirement on sites no larger than one hectare as referenced in the Inspector's Q3 for Matter 8, Issue 2.

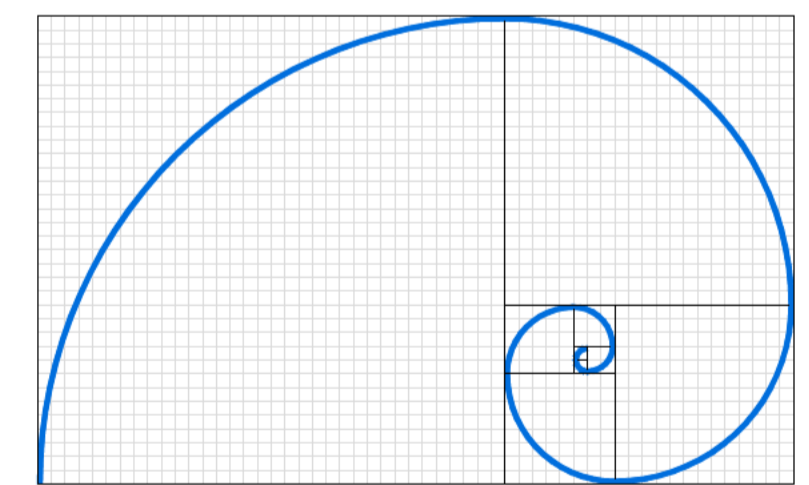
For ease of reference the two documents referred to above are attached in Appendices 1 and 2 below.

Appendix 1: Graylands Estate Masterplan, Existing Residential and Employment Uses and Proposed Uses for East and West Land

REVISION	REV	DESCRIPTION	DATE	BY	CHKD
A	Minor adjustment to definition		29.02.24	GS	G.J.L.



-  Existing Residential
-  Proposed Residential
-  Existing Commercial
-  LPA Reg 19 Proposed Employment Allocation
-  Land Owners Proposed Employment Allocation



FIBONACCI-ARCHITECTS
 The Barons : 46 Church Street : Reigate : Surrey : RH2 0AJ
 Tel: 01737 948288 www.fibonacci-architects.co.uk

PROJECT
GREYLAND ESTATE
LANGHURSTWOOD ROAD
HORSHAM RH12 4QD

DRAWING
INDICATIVE SITE LAYOUT

Appendix 2: HDC SHELAA Assessment of SA363 Graylands Estate

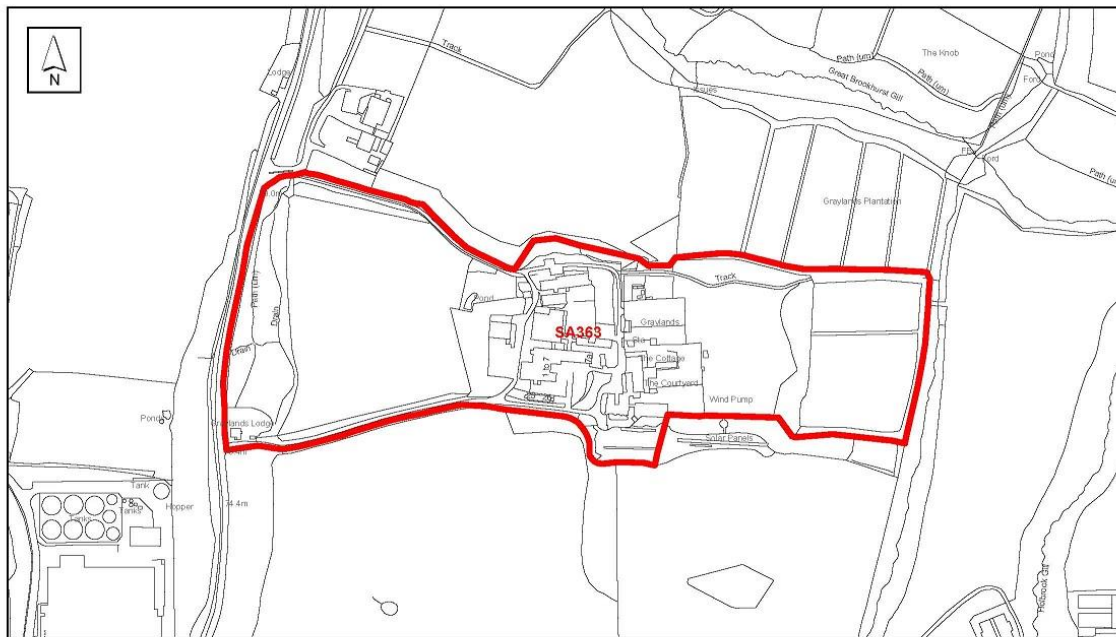
North Horsham

Site Name: Graylands Estate

SHELAA Ref number: SA363

This site has been identified for both housing or employment uses and is therefore written up in both chapters of this document.

Site Map:



<p>Horsham District Council Parkside, Chart Way, Horsham West Sussex RH12 1RL Barbara Childs : Director of Place</p>		<p>North Horsham</p>	
<p><small>Reproduced by permission of Ordnance Survey map on behalf of HMSO. © Crown copyright and database rights (2020). Ordnance Survey Licence: 100023865</small></p>		<p>Reference No :</p>	<p>Date : 28/01/2020</p>
<p>Drawing No :</p>	<p>Drawn :</p>	<p>Checked :</p>	<p>Scale : 1: 4,000 at A4</p> <p>Revisions :</p>

Parish: North Horsham

Site Area: 13.2 hectares

Site Location: The site is located outside the Built-up Area boundary of Horsham. This split site lies in an elevated countryside location either side of an employment area. The western section adjoins the North Horsham strategic development allocation, but at present agricultural fields lie to the south. To the north is a field/woodland then clay quarry, to the west is a landfill site, and to the east is woodland.

Site Description: The site comprises two agricultural fields divided by Graylands Estate, a recently refurbished employment focussed mixed use area which has a dedicated car park and on site Café. It particularly appeals to the micro enterprise business sector and Small to Medium sized businesses. The 1.2ha field to the east is well screened by trees to the north, east and south. The 3.2ha field to the west is also screened by trees along the southern boundary there are far reaching views out over Horsham and towards the South Downs.

Site Access: The site has good access via a private tarmac driveway which is a one way loop via a separate entrance and exit on to Langhurstwood Road, which connects to the A264 to the south.

Proximity to services and facilities: Horsham is the main town within the District and is the main centre for a wide range of shops, employment, services and facilities. It is the largest population centre in the District with a highly skilled workforce. The site is detached

from the main settlement of Horsham but is adjacent to the North Horsham strategic development allocation which, once built, will offer some services and facilities. Graylands Estate has a café and Warnham Station lies c.1.5km away. The site is an important area of employment and will provide local employment opportunities for residents of North Horsham as this site is progressed. The central portion of the site has been identified as a Key Employment Area in the Regulation 18 consultation documentation.

Environmental Considerations:

Landscape: The site does not lie within or near a protected landscape. Though currently isolated from Horsham's built up area boundary, the site is adjacent to the North of Horsham strategic site.

Biodiversity: Ancient woodland lies to the north east and west of the site. In accordance with the Standing Advice from Natural England and the Forestry Commission 15m buffers would need to be observed to protect these designated areas. A Local Wildlife site adjoins the northern boundary of the site and a Site of Special Scientific Interest (Warnham SSSI) is located to the north of site. The impact of development on these features would need to be mitigated.

Archaeology/Heritage: An Archaeological Notification Area (Medieval Moated Site & Warnham Brickworks) adjoins the southern boundary and a Scheduled Monument lies across a field to the south west. These would need to be considered should the site be developed.

Environmental Quality: The site is relatively tranquil. It lies within the Brick Clay (Weald Clay) Minerals Safeguarding area and half to the west field forms part of Warnham Brickworks Mineral Site. Much of the site lies within a Heat Priority Area. About a third of the western field lies with a Major Hazard 390m consultation buffer zone (Warnham Brickworks). The existing employment uses have the potential to generate noise / lighting impacts on new residents.

Flooding: The site lies within Flood Zone 1 – the lowest level of flood risk.

Combined RAG Rating: Unfavourable Impacts (with potential for mitigation)

Site Assessment Conclusion: The site lies within the countryside but is adjacent the North Horsham allocation (SA296). The central area of the site is currently employment use and the landowner is seeking housing and/or employment to the east and west. The Local Plan Review Issues & Options (April 2018) proposed the central area of the site (Graylands Estate) as a Key Employment Area and as a potential location for additional employment growth and the site has been proposed for allocation in the Regulation 18 consultation. The site relates well to the existing employment uses and would provide valuable employment opportunities for residents in the North Horsham development. Given the existing employment use on the site, residential development around this site could lead to noise or lighting impacts from the current uses from new residents.