



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 7: Whether the other economic policies are justified, effective, consistent with national policy and positively prepared?

Issue 2

November 2024

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

Question 1: Is Policy 31: Rural Economic Development sound?

1. The Council considers that the policy is sound. In summary:

- **Positively Prepared:** The policy forms part of a strategy which, as a minimum, seeks to meet the area's objectively assessed employment needs, and is informed by agreements with other authorities, and is consistent with achieving sustainable development. The policy reflects the District is predominantly rural where 32.7% of employment is rurally based, as set out in the **Northern West Sussex Economic Growth Assessment (EC02)** which objectively assesses the economic needs of the planning District. Rural employment is therefore important to the sustainability of the planning District. The policy is therefore important for the delivery of the strategy and for helping to meet objectively assessed needs.
- **Justified:** The policy helps in the delivery of an appropriate strategy. In particular the **Northern West Sussex Economic Growth Assessment (EC02)** makes clear 32.7% of employment in Horsham District is rurally based. Therefore, there is an ongoing need to maintain and enhance the rural economy.
- **Effective:** The policy is deliverable over the plan period and meets the aim to support sustainable rural economic development and enterprise within the District as a whole.
- **Consistent with National Policy:** The policy will enable the delivery of sustainable development in accordance with **the NPPF** in particular **paragraphs 84 and 85** which relate to supporting a prosperous rural economy, and **paragraphs 89, 105, 106, 120, 174**.

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. Horsham District is predominantly rural, including many rural settlements. Policy 31 relates to rural economic development and applies to the planning District of Horsham. Criterion 1 makes clear it applies to the planning District as whole. Criterion 2 makes clear it applies to proposals outside built-up area boundaries or secondary settlements. Criterion 3 and 4 apply to any qualifying development and therefore to the planning District as a whole. 'Rural' is the key word and therefore the application throughout the District would depend upon the nature of the site/location and/or proposal. For example, the policy would not apply to development within Horsham Town Centre but could apply to proposals on the edge of the settlement.
3. It is considered clear that all criteria apply as relevant to a development proposal. This does not mean all proposals must comply with all criteria. As raised above it will depend on the geographical location, for example, Criterion 2 only applies to development outside built-up area boundaries or secondary settlements.
4. **Paragraph 1.6** of the Plan is clear that all policies within the Plan relate to each other, and that the document should be read as a whole. The policy will apply to the employment allocations, which lie on the edge of settlements / urban extension. However, as an allocation there is clear support for employment development and the principle of development will be in place. This means criterion 2, and also criterion 1, would be addressed/outweighed by development compliant with Strategic Policy 29.

b) [How has this policy taken into account allocations in Neighbourhood Plans?](#)

5. This is a non-strategic policy and **paragraph 30** of the **NPPF** is relevant. As reflected in the **glossary of the NPPF** and **paragraphs 1.1 and 2.18** of the Plan, made Neighbourhood Plans form part of the Development Plan.

6. It is acknowledged in the policy's supporting text (**paragraph 9.30**) that Neighbourhood Planning plays an important role in identifying and promoting sustainable economic growth at the local level. **Paragraph 2.18 of the Plan (SD01)** makes clear that some of the Neighbourhood Plans identify sites for employment that will contribute to the overall delivery of the identified development needs for the District. This policy does not, nor any other policy/section of **the Plan (SD01)**, deallocate any of the Neighbourhood Plan sites. The Policies Map reflects the allocations and designations within made Neighbourhood Plans. It is not considered necessary for **the Plan (SD01)** to specifically make clear sites allocated in Neighbourhood Plans are supported as they form allocations elsewhere and are incorporated into the Council's employment trajectory where relevant.
7. The **Pulborough Neighbourhood Plan¹**, which is due to go to referendum early 2025, allocates a similar site to **EM3** in **Strategic Policy 29** of the Plan. As reflected in the Council's response to Question 1.a above, the policy would apply to these and any future Neighbourhood Plan employment allocations that may arise, acknowledging criteria 1 and 2 of the policy is considered to be addressed/outweighed by the principle of development set and an allocation compliant proposal.

Question 2: Is Policy 32: Conversion of Agricultural and Rural Building to Commercial, Community and Residential Uses sound?

8. Yes, the Council considers the policy to be sound. It is:
 - **Positively prepared:** the policy provides certainty for those seeking to convert an agricultural or rural building outside built up areas of the District with wording which makes clear where development will be supported;
 - **Justified:** Horsham is a rural district and the Council often deals with Class Q conversion applications, or applications for agricultural conversions where Class Q is a fall back position. The policy provides more assurance for applicants over what will be accepted by the decision maker, and a clear framework for a decision maker to apply;
 - **Effective:** the policy provides a realistic and framework for decision making, which is balanced between the need to secure and protect the rural economy and the need for flexibility where existing buildings are shown to be redundant in their current use; and
 - **Consistent with national policy:** the policy allows a sustainable level of considered, well designed redevelopment to take place in rural areas without detriment to the rural economy, as required by **paragraphs 80 and 84** of the NPPF.

a) [Is this policy only concerned with conversion to residential use?](#)

9. Policy 32 is the subject of a suggested modification at submission stage (**HM044 in HDC Schedule of Suggested Modifications to the Regulation 19 Local Plan (SD14)**) which suggests it would be appropriate to amend the policy title to remove the reference to conversion to commercial and community uses. The modification would make clear that the policy is only intended to relate to the conversion to residential use. Strategic Policy 31(2c) sets out the policy approach for conversion of employment premises to other 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?](#)

10. The policy's geographical application, as stated in the policy wording itself, is in relation to any agricultural or rural buildings which are not within a defined built-up area boundary, or within the boundary of a secondary settlement. i.e., the building should be in the countryside. Representations made at Regulation 19 stage raised concerns at the exclusion of "strategic site allocations" from the geographical application of the policy.

¹ https://www.horsham.gov.uk/data/assets/pdf_file/0005/141467/Pulborough-Neighbourhood-Plan-Referendum-November.pdf

11. The Council has considered and responded to the treatment of strategic site allocations in the settlement hierarchy under **Matter 2, Issue 3 Question 3e)**. In summary, it is not considered appropriate to assign settlement status to allocations which only serve to identify that the principle of development is acceptable. Instead, any changes to built-up area boundaries and settlement status should be made under future local plan reviews. In the context of agricultural conversions, the Council remains entirely unconvinced that there is any justification for amendments to the policy in the context raised at Regulation 19 given that the relevant site allocation policy under which any application would be assessed would be the principle focus for the decision maker.

Question 3: Is Policy 33: Equestrian Development sound?

12. The Council considers that the policy is sound. In summary:

- **Positively Prepared.** The policy aims to meet the needs for equestrian development in Horsham District and is reflective of the approach in the current HDPF which has been used successfully to manage equestrian development.
Justified. Horsham is a rural District with an extensive bridleway network and a high number of directly equestrian related businesses which are important to the rural economy including privately owned horses which rely on the support of other local businesses. Since the adoption of the **Horsham District Planning Framework** in November 2015 the council has received on average 33 equestrian related planning applications per year. Given this context, it is seen as necessary to have a policy to set out the approach to the management of relevant proposals, and ensure the careful planning, design, and management of land on which horses are kept.
- **Effective.** This policy expands on **Policy 29** of the **Horsham District Planning Framework** which was previously found to be sound and effective. The policy intends for equestrian development to be of high-quality and appropriate to its location. The revised policy emphasises the relation of new facilities to the landscape, utilities, and transport infrastructure as well as existing buildings and the bridleway network and is worded clearly enough to be effective.
- **Consistent with National Policy.** Policy 33 aims to ensure that equestrian facilities are located sustainably in accordance with **NPPF (September 2023) Section 2 Achieving Sustainable Development** and can grow sustainably in accordance with **NPPF (September 2023) paragraph 84a), b) and c) Supporting a prosperous rural economy.**

Question 4: Is Strategic Policy 34: Tourism Facilities and Visitor Accommodation sound?

13. The Council considers that the policy is sound. In summary it is:

- **Positively prepared** – in that it sets out a positive and flexible approach to ensure that relevant proposals can be brought forward to meet the needs of the tourism sector.
- **Justified** – tourism is as an important aspect of the local economy, accounting for 6.1% of the District's jobs as highlighted by the **Visitor Economy Strategy 2018-2023 (HDC12)**, which the Council wishes to support and grow. This is evidenced by the **Horsham District Economic Strategy 2017-2027 (HDC13)** which identifies that promoting tourism is a priority. The **Horsham District Hotel & Visitor Accommodation Study 2016 (HDC11)** identifies accommodation capacity and future needs.
- **Effective** – it is a permissive policy that encourages proposals for tourism facilities and visitor accommodation, whilst protecting existing assets from loss to other uses unless justified. The Council is of the view that the policy is appropriately clear for it to be effective.
- **Consistent with National Policy** – the approach is consistent with the NPPF, and in particular relevant policies in **Chapter 6 (paragraphs 81-85)** relating to encouraging a sustainable economy and supporting a prosperous rural economy.

Question 5: Is Strategic Policy 35: Town Centre Hierarchy and Sequential Approach sound?

14. Yes, the Council's view is that the policy is sound. It is:

- **Positively prepared:** it seeks to provide certainty by setting out the hierarchy of various sizes of centres in the District, and outlined how the Town Centre First approach applies in the District's context.
- **Justified:** the policy responds to the evolving challenges being faced by town centres, and ensures that proposals will be directed in a way that supports their viability, while recognising the need to address opportunities to a limited degree on the out-of-centre location at the Broadbridge Heath Quadrant. The more stringent threshold for retail impact assessment is evidenced by the **Horsham Town Retail and Leisure Study 2017 (EC01)**.
- **Effective:** the policy assumes proposals will come forward through the life of the Plan, and seeks to direct these to appropriate, sustainable locations in a clear way which offers certainty to applicants. The policy exists in the HDPF, and has been used successfully since its adoption, only requiring updates to reflect changes in the economic and retail/leisure environment and how communities interact with town centres; and
- **Consistent with national policy:** the policy is consistent with national policy (**NPPF paragraphs 86 to 91**) in setting out a hierarchy of town centres and giving preference to accessible, well-connected out of centre sites. It also accords with **paragraph 90** of the NPPF in respect of setting a locally set retail impact assessment threshold where evidence shows this is proportionate.

a) [Paragraph 86 d\) of the NPPF requires planning policies to allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. What is the need and how would the Plan meet it and is the relevant evidence base up to date?](#)

15. The text leading into **Paragraph 86 d)** makes clear that the NPPF intends to support town centres' role at the heart of communities "by taking a positive approach to their growth, management and adaptation". The approach taken in the Plan is in the context of a town centre which is performing well despite wider economic and cultural difficulties being faced by town centres. The **Horsham Town Retail and Leisure Study 2017 (EC01)** contained an assessment of the need in terms of convenience and comparison good floorspace in Horsham Town to the year 2031 (**paragraph 7.18 of EC01**). The study concluded that the Council should plan for a level of need for the period up to 2026, due to the level of uncertainty in terms of retail and high street need and demand. The need in this period was identified as around 7,500sqm of convenience goods floorspace and 10,700 sqm of comparison goods floorspace.
16. The **Horsham Town Retail and Leisure Study 2017 (EC01)** recommended that strategic sites, in particular the Land North of Horsham strategic allocation, should be the focus of new retail development to meet a need to 6,000sqm (recommendation HTC8). The site has received outline planning permission for 4,900sqm of retail floorspace. Recommendation HTC9 in **EC01** was for 4,500sqm of convenience goods floorspace and 7,700sqm of comparison goods floorspace to be delivered in the town centre. While the planned scale of retail floorspace has not yet been delivered on the Land North of Horsham site, there have been significant levels of regeneration in the town centre both towards the west in the Bishopric, and in Piries Place to the east. There remains a level of vacancy in the new retail units, although generally town centre vacancy levels are low because of the flexible and pragmatic approach to uses, which supports the proposed policy approach.
17. **Strategic Policy HA2: West of Ifield** contains a requirement for the delivery of approximately 3,300sqm of new retail floorspace on site, and both **Strategic Policy HA3: Land North West of Southwater** and **Strategic Policy HA4: East of Billingshurst** included requirements for retail floorspace to be delivered in order to meet local need.
18. In combination, it is considered that the retail floorspace requirement as assessed in **EC01** is met through outstanding commitment at Land North of Horsham, strategic site allocations HA2, HA3 and HA4, and vacant units in Horsham Town.

b) [Where do neighbourhood centres to be provided as part of strategic allocations fit within the town centre hierarchy identified in table 8?](#)

19. These sit within the Local Centres tier of the Town Centre Hierarchy (Table 8 within Strategic Policy 35). Any changes required to the assessment of new town, village or neighbourhood centres should take

place once development on strategic allocations have commenced and the precise design and scale is known, usually in future local plan reviews.

c) [is the threshold for retail impact assessment of 500 metres square set out in criterion 5 justified?](#)

20. Yes, the 500sqm threshold is justified. This relates directly to recommendation HTC14 in the **Horsham Town Retail and Leisure Study 2017 (EC01)**, which recommended that the Council enforce this level as an impact threshold for all edge and out-of-centre retail proposals. This is in the context of Horsham Town as a successful and vibrant town centre with an average retail unit size below the 2,500sqm level in paragraph 90 of the NPPF and where proposals for out-of-centre smaller units would be in direct competition with the town centre offer, usually with incentives such as free parking and easy access.

d) [is the geographical application of this policy accurately identified on the submission Policies Map?](#)

21. Policy 35 makes reference to two geographical elements identified on the submission Policies Map:

- **Town and Village Centres:** These are defined on the map for the seven named Primary and Secondary Centres in Table 8 of the Plan.
- **Main Shopping Areas:** Areas within the Town and Village Centres where certain town centre uses should be concentrated within Centres.

22. In order to reflect this, the Council suggests a modification (**POM03 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) is made to the Policies Map to make clear that the Main Shopping Area which relates to Policy 36 also applies to Policy 35. This suggested modification is to ensure Policy 35 is effective.

Question 6: Is Strategic Policy 36: Town Centre Uses sound?

23. Yes, the Council's view is that the policy is sound. It is:

- **Positively prepared:** the policy seeks to provide certainty for applicants by directing different use classes to areas within defined town centre boundaries, seeking to protect these centres' role at the heart of communities. This is balanced with the need for flexibility, the need for centres to be able to evolve and respond to changes in how town centres are used, and consideration of the benefit of sustainable access to small-scale local services;
- **Justified:** while the **Horsham Town Retail and Leisure Study 2017 (EC01)** recommended the Council consider the use of Article 4 directions in order to avoid the loss of traditional retail in key areas within town centres. The Council believes this is only likely to be required in the absence of a policy such as this which is intended to respond to change of use applications in town centres which risk undermining their viability and resilience in the face of economic pressures, while allowing for appropriate diversification and proposals which support footfall and vitality;
- **Effective:** the policy takes account of the current Use Classes Order, and permitted development rights, yet provides a clear but flexible indication of which uses will be supported and in which geographical areas of the District's centres. The policy exists in the HDPF, and has been used successfully since adoption, only requiring update to reflect changes to the use class order and permitted development rights, and the increased need for flexibility;
- **Consistent with national policy:** the policy is consistent with national policy (NPPF para 86.a) in allowing an appropriate mix of uses within defined town centre boundaries and for these to reflect the character of the area. Para 86.b) makes clear policies should provide clarity on the range of acceptable uses as part of a positive strategy, which the policy does. The benefit of residential development is recognised, in line with NPPF para 86.f).

a) [Is it clear how a decision maker should react to criterion 4 when criterion 9 relates to proposals in Primary Frontages only?](#)

24. Yes, it is clear, however the Council has suggested a modification to the wording of both the supporting text and the policy itself to ensure there is no ambiguity (**SM33 and SM34 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**).

25. This modification helps clarify that, under criterion 4, decision makers should treat Class E uses favourably over other uses when presented with an application within Main Shopping Areas. Under criterion 4 if a decision maker is satisfied that lack of viability has been demonstrated and a use outside Class E is proposed, they should then consider the proposal under the requirements set by criterion 5.
26. Criterion 9 requires a demonstration of 12 months of marketing for loss of Class E use within Primary Frontages only.