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# Examination of the Horsham Local Plan 2023 -2040

Matter 7 – Written  
Statement

Representation  
Number: 1209748

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21 NOVEMBER 2024

Q1004567

# Contents

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1	Introduction	1
2	The Site	2
3	Matter 7 – Economic Development	3
	Figure 1: Site Location Plan	2
	Table 1: Response to Q2	4

# 1 Introduction

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- 1.1 This Written Statement has been prepared by Quod on behalf of Graftongate and Legal & General ('L&G') (together the 'Representors') who are the freeholders of the former RSCPA Building on Wilberforce Way, Southwater, Horsham RH13 9RS ('the Site').
- 1.2 This Written Statement responds to the Matters, Issues and Questions ('MIQs') set out by Inspector Luke Fleming BSc (Hons) MRTPI IHBC. Specifically, it responds to the following:
  - Matter 7, Issue 1, Q2 – Is **Strategic Policy 30 Enhancing Existing Employment** sound?
- 1.3 Quod submitted representations on behalf of the Representors to the Regulation 19 Local Plan consultation in March 2024, provided at Appendix 1.
- 1.4 The Site benefits from planning permission, granted on 4 June 2024 for:

*“Demolition of existing building and the erection of 3no buildings to provide flexible industrial and storage and distribution floorspace (Use Class B2/B8) and ancillary office floorspace, with associated hard and soft landscaping, car and cycle parking, supporting infrastructure and retention of existing attenuation pond.”*
- 1.5 The Representors are progressing the project as a joint venture. Both parties are committed to developing industry leading buildings at the forefront of sustainable technologies. Together, L&G and Graftongate will strive to ensure that the built environments they develop have a positive impact on the wider natural and built environment.
- 1.6 The Representor is seeking to promptly build out the permission, however during the course of Planning Committee, overly onerous operating conditions were added to the permission which restricts its ability to meet the needs of prospective industrial occupiers.
- 1.7 The Representor welcomes the general approach to **Strategic Policy 30 Enhancing Existing Employment**, however considers further support is vital to ensure these sites can appropriately accommodate the needs of prospective industrial occupiers.

## 2 The Site

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- 2.1 The Site, outlined in **Figure 1** below, forms part of the wider Oakhurst Business Park, which comprises a range of mid-size industrial and business units, apart from the Site itself. The Site, most recently used as a bespoke office for the RSCPA is currently vacant, but as noted, benefits from planning permission for B2/B8 development.



Figure 1: Site Location Plan

- 2.2 The Site lies to the east of the business park, and is well separated from the established residential areas to the south and west. The nearest residential dwelling are the Grade II listed Nye's Cottage and Wellers Farm to the south of the Site, beyond the tree belt and on the other side of Southwater Street, approximately 180m and 240m from the centre of the Site respectively.

## 3 Matter 7 – Economic Development

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**Matter 7, Issue 1 – Whether the approach to employment land and supply is 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?**

- 3.1 No. The policy as drafted does not robustly enable the enhancement of Key Employment Areas ('KEAs').
- 3.2 While the inclusion of the Site is welcomed, KEAs must be protected and supported as the best areas in the district for businesses to invest in.
- 3.3 Part 1 of Strategic Policy 30 supports the upgrading and refurbishment of existing premises provided, inter alia, they meet modern business standards. It is recommended that explicit reference to accommodating 24-hour use as part of an industrial development is made, as this is a crucial element of meeting modern operator requirements, and is critical to minimising the associated transport impacts allowing deliveries to avoid peak hours. This would assist in development at KEAs in meeting the criterion set by 1 c), subject to appropriate management plans to protect amenity.
- 3.4 Part 2 supports the redevelopment and intensification of existing employment sites where they retain existing business and/or protect or create jobs. Again, it is strongly recommended that specific mention of the need to protect and support businesses needs to operate on a 24-hour basis is added, as this is imperative in the drive to retain and attract modern operators to Horsham.

- 3.5 The reference to intensification is welcomed, and the inclusion of intensification within Strategy Policy 30 would be supported. It should be noted that intensification of employment floorspace is typically delivered in one of three ways:
- Increase in useable space via increased floorspace or yard / hardstanding area (to increase useable space, dependent on use);
  - Increase in height (to increase total volumetric capacity); and
  - Increase in operating hours (to allow more efficient use of a site / building).
- 3.6 All three typical intensification methods can increase the efficiency of sites, and increase the number of jobs that can be generated, both directly and indirectly.
- 3.7 **Given the constraints of sites within HDC, which can limit the ability to extend upwards and outwards, it is vital that KEAs are able to operate on a 24-hour basis to maximise the economic output of sites.**
- 3.8 Responses to Q2 are provided in the table below.

Table 1: Response to Q2

Question	Response
Q2. <i>Is Strategic Policy 30 Enhancing Existing Employment sound?</i>	No. Amendments are required.
a) <i>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?</i>	Yes, the Key Employment Areas (Strategic Policy 30: Enhancing Existing Employment): Oakhurst, Southwater is clear on the policies map.
b) <i>Should criteria 1 also refer to intensification?</i>	Yes, see proposed amendments to the policy wording for criterion 1 and 2 below regarding intensification and 24/7 use.  It is noted that intensification is partially addressed through criterion 4, with a sensible approach taken .
c) <i>Does criterion 1 b) require effects not caused by a development proposal to be mitigated, if so, is this consistent with national policy?</i>	No, see proposed amendments to the policy wording for criterion 1 and 2 below to give appropriate consideration to the ‘agent of change’ principle.
d) <i>Are there potentially other impacts which should be considered which are not covered</i>	No comment.



Question	Response
<i>by criterion 1 c) and is the policy effective in this regard?</i>	
<i>e) Is the geographical application of this policy on the submission Policies Map accurate?</i>	Yes.
<i>f) Are the requirements set out in criterion 7 justified and effective?</i>	No comment.

3.9 To address the requirement for 24/7 use and intensification, alongside appropriate consideration of the ‘agent of change’ principle, it is proposed that the following amendments are made to the policy wording, with additions in **green** and removals in **red**:

1. Proposals for the **intensification**, upgrading and refurbishment of existing offices, industrial / business estates, premises and sites will be supported provided that:

- a) they enable the facility to meet modern business standards, **including through supporting existing and future occupiers being able to operate on a 24-hour basis;**
- b) ~~and~~ demonstrably enhance the attractiveness of the District as a business location;
- c) ~~b)~~ they mitigate existing amenity, highway and access issues arising from badly sited uses **as far as is reasonably possible, while providing appropriate consideration to the ‘agent of change principle’;** and
- d) ~~e)~~ potential new impacts on amenity and on the road network are mitigated.

2. The **intensification**, redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses will be supported where it facilitates the retention of existing businesses within the District, and / or protects or creates new jobs, including green industries and social enterprises. **This includes the recognition of the need for modern occupiers to be able to secure the ability to operate on a 24-hour basis.** Proposals must demonstrate that they meet all the following criteria:

- a) it is in keeping with the existing scale of provision and local area;
- b) the proposal will complement and not prejudice the operation of surrounding employment uses;
- c) it protects the amenity of existing and surrounding uses;
- d) any adverse impacts would not significantly outweigh the benefits; and it is a Key Employment Area or Other Existing Employment Site as defined in this policy.

4. All proposals within a Key Employment Area, including proposals for alternative sui generis ‘employment’ uses and offices must demonstrate they:

- a) support the integrity and function of the Key Employment Area; and
- b) do not result in the overall net loss of employment floorspace unless it can be demonstrated that the loss **is not significant, and** would lead to a significant upgrade of the retained / **replacement** employment floorspace.

3.10 It is strongly recommended that supporting text notes that “intensification” is not only through increases in floorspace, as noted earlier.

## Appendix 1 – Regulation 19 Response



**Our ref:** Q220261  
**Email:** [REDACTED]  
**Date:** 1 March 2024



Strategic Planning Team  
Horsham District Council  
Parkside  
Chart Way  
Horsham  
West Sussex  
RH12 1RL

By email only

Dear Sir/Madam

## **Response to Horsham District Local Plan 2023 - 2040 (Regulation 19)**

These representations are prepared by Quod, on behalf of Graftongate, to respond to the consultation being held by Horsham District Council ('HDC') on Horsham District Local Plan 2023 - 2040 (Regulation 19) ('dHLP').

Graftongate is a commercial real estate investor and developer, specialising in industrial and logistics development, and the owner of the former RSCPA HQ at the Southwater Industrial Estate.

Overall, Graftongate is supportive (subject to the comments raised in this representation) of the intent of dHLP to meet the needs of the district to 2040 with particular support for the vision, which identifies the need for there to be access to high quality jobs in Horsham. The dHLP recognises that economic growth in Horsham fits within the wider context of the Gatwick Diamond and therefore supports the retention and growth of existing employment land. Graftongate welcomes this support.

However, it is considered necessary that further detail must be added to dHLP Strategic Policy 30 to ensure that there is clear support for 24 hour operation at Key Employment Areas such that it can maximise the ability of HDC to protect, enhance and appropriately intensify the use of its industrial land to meet the requirements of local and regional occupiers.

### **Representations**

These representations do not serve to comment on the dHLP in its entirety, but rather provide a response to dHLP Strategic Policy 30. Graftongate reserve the right to comment on other parts of the dHLP at a later date should they choose to do so.

### **1 Strategic Policy 30 – Enhancing Existing Employment**

Strategic Policy 30 offers support for employment use ranging from refurbishment to wholesale regeneration of employment sites. Graftongate welcome the inclusion of the former RSPCA HQ in the Key Employment Area ('KEA') and recognition that KEAs accommodate a varied portfolio of uses in





locations across the District. It is acknowledged in paragraph 9.21 that there is a continued need for key locations to be protected for employment uses, which Graftongate is supportive of.

Graftongate support the specific identification of Southwater Business Park as a KEA, protected for industrial, storage and distribution use classes.

Part 1 of Strategic Policy 30 supports the upgrading and refurbishment of existing premises provided, inter alia, they meet modern business standards. It is recommended that explicit reference to accommodating 24-hour use as part of an industrial development is made, as this is a crucial element of meeting modern operator requirements, and is critical to minimising the associated transport impacts allowing deliveries to avoid peak hours.

Part 2 supports the redevelopment and intensification of existing employment sites where they retain existing business and/or protect or create jobs. Again, it is recommended that specific mention of the need for businesses to operate on a 24-hour basis is added, as this is imperative in the drive to retain and attract modern operators to Horsham.

### Proposed Amendments

It would therefore be beneficial if the dHLP were to include reference to 24-hour use being acceptable and supported as part of industrial developments, with suggested text provided below in **green**:

1. Proposals for the upgrading and refurbishment of existing offices, industrial / business estates, premises and sites will be supported provided that:

- a) they enable the facility to meet modern business standards, **including through supporting existing and future occupiers being able to operate on a 24-hour basis;**
- b) ~~and~~ demonstrably enhance the attractiveness of the District as a business location;
- c) ~~b)~~ they mitigate existing amenity, highway and access issues arising from badly sited uses; and
- d) ~~e)~~ potential new impacts on amenity and on the road network are mitigated.

2. The redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses will be supported where it facilitates the retention of existing businesses within the District, and / or protects or creates new jobs, including green industries and social enterprises. **This includes the recognition of the need for modern occupiers to be able to secure the ability to operate on a 24-hour basis.** Proposals must demonstrate that they meet all the following criteria:

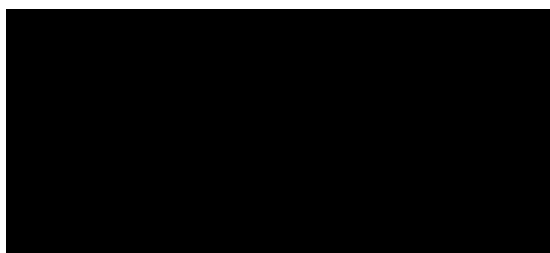
- a) it is in keeping with the existing scale of provision and local area;
- b) the proposal will complement and not prejudice the operation of surrounding employment uses;
- c) it protects the amenity of existing and surrounding uses;
- d) any adverse impacts would not significantly outweigh the benefits; and it is a Key Employment Area or Other Existing Employment Site as defined in this policy.



## 2 Next Steps

Graftongate would welcome the opportunity to discuss any of these points in greater detail with HDC and commend the work currently undertaken which has resulted in a robust and forward thinking Local Plan.

Yours sincerely



James Guthrie  
Director