

WT LAMB PROPERTIES LIMITED – PARTICIPANT ID 1198152

## Horsham District Local Plan Examination in Public – Matter 7, Issue 1 Hearing Statement

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November 2024

**Matter 7, Issue 1 – Whether the approach to employment land and supply is justified, effective, consistent with national planning policy and is positively prepared?**

### INTRODUCTION

1. Our response to Matter 7, Issue 1 is submitted on behalf of WT Lamb Properties Limited (WTL), who own the existing Broomers Hill Business Park (Phases 1 and 2) and the land proposed for allocation at Site EM3 of Strategic Policy 29 of the emerging Local Plan, on a freehold basis (Phase 3).
2. WTL is generally supportive of the emerging Horsham District Local Plan (HDLP), including Strategic Policy 29 and the allocation of their land holding for employment purposes. However, they consider that minor amendments should be made to the Policy to ensure that it is sound. These modifications include:
  - to ensure that Table 5 of the HDLP is justified, there is a need for it to include employment land commitments DC13/1048 and DC/16/2006;
  - no evidence has been provided for the need for employment allocations to provide a mix of tenures. It is therefore unjustified and should be removed from Strategic Policy 29;
  - to ensure that it is a justified proposition, there is a need for the uses proposed for Site EM3 within Strategic Policy 29 to accord with those proposed for the same site in Policy 7 of the Pulborough Neighbourhood Plan; and
  - to ensure that it is a justified proposition, Broomers Hill Business Park should, as has been agreed through the Neighbourhood Plan process, be included within the built-up area boundary.
3. WTL also considers that the proposed allocation of Site EM3, which is already proposed for allocation in the Pulborough Neighbourhood Plan, which is at Referendum stage, is soundly based.
4. In preparing this Hearing Statement, WTL have had regard to the main modifications proposed by the Council at the time of writing, as set out in SD14 and SD15.

### Question 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?**

5. The most up-to-date assessment of the employment land requirement is established within the Employment Growth Assessment Focused Update for Horsham (EGA)<sup>1</sup>. The work considered three
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broad methods for forecasting the need for additional employment land in the period up to 2037<sup>2</sup>. The conclusions of this work are set out below:

TABLE 1: EMPLOYMENT LAND REQUIREMENT SCENARIOS

	<b>BASELINE JOB GROWTH BASED ON OXFORD ECONOMETRICS (2020)</b>	<b>PAST DEVELOPMENT RATES</b>	<b>BASELINE LABOUR SUPPLY (920 DPA)</b>	<b>MEDIUM LABOUR SUPPLY (1,200 DPA)</b>	<b>HIGH GROWTH LABOUR SUPPLY (1,400 DPA)</b>
Requirement	13,300sq.m / 0ha	179,240sq.m / 45.1ha	166,990sq.m / 37.5ha	240,910sq.m / 54ha	303,820sq.m / 68.1ha

6. Due to the environmental constraints within the District, the levels of housing growth used to inform the medium and high growth labour supply scenarios, are levels of housing that are not being planned for. As such, the evidence presented within the EGA would suggest that the requirement for employment land is between 13,300sq.m/0ha and 179,240sq.m/45.1ha over the period 2019 to 2037. This is confirmed at para. 9.12 of the HDLP. It is noted that para. 4.4 of the EGA raises concerns with using the Oxford Econometrics jobs growth based scenario, which they considered **“do not appear a sensible basis for long-term planning in the District”** and would risk **“constraining the District’s economy.”**
7. Notwithstanding the above, para. 9.12 of the HDLP also introduces some ambiguity over how the requirement has been calculated, as reference is made to the use of a labour based supply approach commensurate with 800 dwellings per annum (dpa). Whilst this broadly correlates to the housing requirement established in Strategic Policy 37, it does not appear to correlate with any of the scenarios assessed within the EGA. The closest scenario assessed is the baseline labour scenario associated with an objectively assessed need for housing of 920 dpa, which accords with the objectively assessed need for housing as stated within the Plan (911 dpa)<sup>3</sup>, but does not reflect the housing provision being made in the Plan (13,212 dwellings or 777 dpa).
8. Given this ambiguity, WTL consider that the employment land requirement should be more clearly evidenced and articulated in the Plan. This will help to more clearly demonstrate that the Plan is positively prepared and meets the objectively assessed needs for employment land over the Plan period. Such an approach has been adopted in Strategic Policy 37, which relates to housing, and within its supporting text.

**(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?**

9. Table 5 of the emerging HDLP sets out what the Local Planning Authority (LPA) (but not WTL) considers to be the existing employment land commitments. The six sites cumulatively provide 139,242sq.m of employment floor space. This broadly correlates with evidence presented within the 2022/23 Authority Monitoring Report (AMR), which suggests at Table 7 that 139,390sq.m/79ha of

<sup>2</sup> Para. 2.4.

<sup>3</sup> Para. 10.4.

employment land is available<sup>4</sup>. It should be noted that the supply identified in both documents is significantly below that identified in the EGA<sup>5</sup>.

10. A further 28,000sq.m of floorspace is proposed for allocation from sites EM1 to EM4. Consequently, a total supply of 167,242sq.m of employment land is planned for. A further 6.5ha of land is allocated for employment purposes at Strategic Allocations HA2 to HA4.
11. No confirmation of the level of employment land that has been delivered since the start of the Plan period is provided within the HDLP.

### WTL's concerns with Table 5 of the HDLP

12. If as implied by the title of Table 5 of the HDLP, it includes all existing employment land commitments, then WTL are concerned that it does not include their extant planning permissions at Phase 2 of the Broomers Hill Business Park (DC13/1048 and DC/16/2006). These consents have, as demonstrated in the correspondence provided at Appendix 1 of these representations, been implemented and are extant. The content of the email was also acknowledged by the Case Officer.
13. Given the above, so as to ensure that Strategic Policy 29 and its supporting text is **justified**, Table 5 should be redrafted to include these existing commitments.

**(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?**

14. It appears that the Plan is seeking to provide an employment land supply that rightfully exceeds identified requirements. As established above, the highest employment land requirement from the reasonable scenarios modelled in the EGA is based on past development rates. That approach establishes an employment land requirement of 179,240sq.m/45.1ha.
15. The employment land commitments set out at Table 5 of the Plan only provide 139,242sq.m of employment floor space. Consequently, based on past development rates, there is a need to allocate additional employment land, as a shortfall of 39,998sq.m would result.
16. Even when accounting for employment land allocations EM1 to EM4, a shortfall of 11,998sq.m would result. An overprovision would only result when the employment land proposed at Strategic Allocations HA2 to HA4 are included.
17. The modest buffer proposed, when assessed against the past development rates scenario, is considered to be both justified and effective and will ensure that the requirement is delivered in full over the Plan period.
18. Moreover, such an approach is supported by the evidence base underpinning the HDLP, where a number of concerns were raised about planning for an employment land supply based against the lowest employment land requirement forecasts. These concerns included:
  - a small number of large employment commitments, some of which are subject to uncertainty around their deliverability and when they will come forward;
  - the impact of the pandemic. The analysis outlined that the pandemic had led to growth in a number of economic sectors that could provide growth opportunities for the District. Similarly, the Report observed that there had been a shift from city living and working, with people looking to relocate for lifestyle reasons. Home working and working in office developments in smaller towns which are well connected by active travel modes, were also identified as being potential trends;

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<sup>4</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0013/132601/AMR\\_2022\\_2023\\_CHAPTER\\_5\\_Policy\\_Indicators.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0013/132601/AMR_2022_2023_CHAPTER_5_Policy_Indicators.pdf)

<sup>5</sup> Table 3.1.

- changes to the Use Class Order, which make it easier for office space to be converted to alternative uses; and
- the continuation of permitted development rights, which, in certain circumstances allow for the conversion of office space to alternative uses, including residential.

19. Moreover, analysis presented within the HDLP also suggests that:

- there are a number of business sites that are not fit for modern business needs;
- some allocated sites are not likely to come forward;
- there is additional demand for land with better access, or which can accommodate more modern buildings;
- job growth has fallen behind neighbouring authorities, despite population growth exceeding that of the region and nationally;
- the need to provide smaller co-working spaces; and
- there is a need to ensure that a sufficient supply and choice of employment floorspace is available across the District, in both urban and rural areas.

20. As such, the LPA rightly identifies that there is a need to allocate additional employment land.

21. WTL agrees that to plan for lower levels of growth, given the issues highlighted above, would result in an economic development strategy that could not be considered to be positively prepared or justified. The LPA's approach remedies such concerns.

22. In addition, it also provides the opportunity to address existing issues that were identified in the Plan's spatial context, including the propensity of its resident workforce to travel out of the area for employment. The provision of additional employment land might result in more residents working within the area, particularly with the provision of employment land and premises at smaller settlements and developments such as co-working facilities. This in turn could reduce greenhouse gas emissions associated with transport, which could also lead to improved health outcomes.

23. Evidence in relation to the deliverability of Site EM3 is provided in response to Question (e) below.

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

24. It is not clear as to whether proposals for employment land are required to accord with all ten criterion of Strategic Policy 29. It is assumed not, given the wording of criterion nine of the Policy, which will not apply for all allocations. Consequently, its current wording cannot be considered to be clearly written or unambiguous and is therefore not consistent with national planning policy. This could be resolved through a modification to the wording of the Policy.

25. In addition, WTL also note that the policy test requires allocated developments to, amongst other things, deliver a mix of employment tenures. Whilst it is not clearly articulated in the Policy, it is assumed that this means freehold and leasehold opportunities. There are significant risks associated with bringing forward employment land, particularly for freehold disposal. Such risks are often dissipated when returns are obtained over a longer-period of time, using the leasehold approach. Consequently, if the Council seeks to rigidly apply this element of the Policy, it could result in the non-delivery of allocated employment sites. WTL's experience in the local employment land market also suggests that there are few occupiers that would be willing to invest, on a freehold basis, in new employment premises. No evidence has been provided to support this requirement. Consequently, it cannot, as currently drafted, be considered to be **positively prepared, justified, effective, or consistent with national planning policy.**

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

26. Whilst WTL are supportive of the allocation of Site EM3 of the emerging Local Plan, they consider that there are a number of alterations that are required to ensure that the wording of the Policy is justified, effective and soundly based.

### Uses

27. The opening paragraph to the Policy states that the LPA will support sustainable economic growth through the provision of sufficient employment land to meet the needs of those requiring, *inter alia*, **“other employment generating uses,”** as well as B2, B8 and E(g) uses. However, for at least four of the five allocations, the uses are limited to only B2, B8 and E(g) uses and not other employment generating uses. Consequently, there appears to be a conflict between elements of the Policy, which results in it not being clearly written, being ambiguous and as a result, **not in accordance with national planning policy**. References should be made to **“other employment generating uses”** within the text for each allocation.

28. In addition, WTL note that the wording of allocation EM3 also conflicts with the emerging Pulborough Neighbourhood Plan, which has now proceeded to Referendum stage<sup>6</sup>.

29. The proposed wording for allocation EM3 within Strategic Policy 29 limits the uses that could come forward within the site to B2, B8 and ancillary office (E(g)). As set out in Appendix 2 of this representation, in contrast, Policy 7 of the emerging Pulborough Neighbourhood Plan would allow for B2, B8 and all types of Class E uses. No concerns were raised by the Independent Examiner concerning the land uses proposed within Policy 7 of the emerging Neighbourhood Plan<sup>7</sup>. Moreover, the LPA are supportive of the wording of the Neighbourhood Plan policy being taken forward to the final plan<sup>8</sup>.

30. Given the advanced stage of preparation of the Neighbourhood Plan, it is anticipated to be Made prior to the adoption of the emerging HDLP, although a date for the Referendum has not, as yet, been set. If the Neighbourhood Plan is Made first, then it is acknowledged that this conflict could be resolved with the application of Section 38(5) of the 2004 Planning and Compulsory Planning Act. However, this would, in effect, render an element of a Policy within a recently adopted Neighbourhood Plan out-of-date, undermining around five years of work.

31. Conversely, should the emerging HDLP be adopted prior to the emerging Neighbourhood Plan, then, as stated in para. 1.6 of the emerging HDLP, there will be an expectation that the Neighbourhood Plan is prepared to be in general conformity with strategic policies contained within the HDLP, including allocation EM3, which is listed in Strategic Policy 29. In the case of the Pulborough Neighbourhood Plan, which is at Referendum stage, there will be no ability to remedy any conflict, without reopening the Examination or reverting to an earlier stage of the plan-making process.

32. As such, to ensure that the policy wording of Site EM3 of Strategic Policy 29 is **justified** it should be redrafted to reflect the uses set out in the Pulborough Neighbourhood Plan. Such an approach would provide a strong fit with Strategic Objective 5 of the emerging HDLP.

### Policies map

33. It is noted that whilst the HDLP Policies Map acknowledges the site's proposed allocation within Strategic Policy 29, it does not include it within the amended settlement boundary (see Appendix 3). This conflicts with the approach taken forward in the Pulborough Neighbourhood Plan, which proposes to include all of the Broomers Hill Business Park within the settlement boundary (see Appendix 4). The

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<sup>6</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0004/141466/Pulborough-Decision-Statement-8th-November-2024.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0004/141466/Pulborough-Decision-Statement-8th-November-2024.pdf)

<sup>7</sup> Paras. 74 to 78 of [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0014/106061/Pulborough-Examiners-Report-18-Sept-2021.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0014/106061/Pulborough-Examiners-Report-18-Sept-2021.pdf)

<sup>8</sup> Appendix B of [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0004/141466/Pulborough-Decision-Statement-8th-November-2024.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0004/141466/Pulborough-Decision-Statement-8th-November-2024.pdf)



approach adopted in the Neighbourhood Plan responded to a recommendation by the Neighbourhood Plan Independent Examiner<sup>9</sup>.

34. Consequently, should the Neighbourhood Plan be made prior to the emerging HDLP, then all phases of the Business Park would be located within the built-up area boundary for Pulborough, only to be removed shortly after, with the adoption of the emerging HDLP. This is not considered to be a **justified** approach, particularly as, as stated within the LPA's Final Decision Statement on the Neighbourhood Plan, they confirm that they **"agree with the Examiner's recommendation"** to include all of Broomers Hill Business Park within the built-up area boundary<sup>10</sup>.

35. Instead, it is considered that the built-up area boundary for Pulborough within the emerging HDLP should be redrawn, to, as delineated in the Neighbourhood Plan, include all of Broomers Hill Business Park.

## Evidence of the suitability of Site EM3 for employment uses

### Pulborough Neighbourhood Plan

36. As stated above, Site EM3 is proposed for allocation at Policy 7 of the Pulborough Neighbourhood Plan. The Plan is at an advanced stage of preparation, having proceeded to Referendum stage and having been the subject of Independent Examination<sup>11</sup>. No concerns were raised through that process that would suggest that the site's proposed allocation in the Local Plan is not soundly based.

### LPA evidence

37. The LPA's evidence base underpinning the Plan demonstrates the suitability of the site to accommodate employment uses. Specifically:

- **The Sustainability Appraisal (Reference SD03a and SD03C)** – Table 4.5 of Document SD03a provides an assessment of the likely sustainability effects of the site, which is afforded reference SA385. Likely significant positive effects were noted in relation to SA objective 2 (access to services and facilities). Further likely minor positive effects were identified against SA objectives 5 (health), 13 (transport), 15 (climate change), 16 (economic growth) and 17 (access to employment opportunities). Document SD03c concluded that **"the site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy."**
- **The Employment Assessment Outcomes (Reference H11)** – it was concluded that the site would increase employment opportunities at Codmore Hill and within the southern part of the District. Subject to the incorporation of landscape mitigation, biodiversity mitigation and sustainable active travel measures, the site was considered suitable for allocation.
- **Strategic Flood Risk Assessment Update Sequential and Exception Test (References CC04 and CC04b)** – confirms that Site EM3 passed the sequential test for employment uses.

### Landowner's evidence

#### Active and sustainable travel

38. Transport and access work found that footways on the A29 and Broomers Hill Lane connect the site with both Codmore Hill and Pulborough. The whole of Codmore Hill and Pulborough can be reached by bicycle, with the generally low trafficked roads surrounding the site and gentle gradients making cycling a genuine transport choice. It is also within walking distance of a wide range of services and facilities, including two supermarkets, a pharmacy and a healthcare centre. Consequently, the site can be accessed via active travel modes. Bus stops are also located within a three minute walk of the site,

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<sup>9</sup> Para. 55 of [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0014/106061/Pulborough-Examiners-Report-18-Sept-2021.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0014/106061/Pulborough-Examiners-Report-18-Sept-2021.pdf)

<sup>10</sup> See Appendix B of [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0004/141466/Pulborough-Decision-Statement-8th-November-2024.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0004/141466/Pulborough-Decision-Statement-8th-November-2024.pdf)

<sup>11</sup> Paras. 74 to 78 of [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0014/106061/Pulborough-Examiners-Report-18-Sept-2021.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0014/106061/Pulborough-Examiners-Report-18-Sept-2021.pdf)

which are served by bus services 69 and 100, which together provide regular services to Billingshurst, Pulborough, Burgess Hill and Horsham. A railway station is also located within Pulborough. Regular services operate from Pulborough to London Victoria and Bognor Regis.

#### Access

39. The primary access is proposed to be through the existing Business Park to the north. An alternative access onto the A29 is also shown on the masterplan proposals. The assessment work concluded that the additional trips associated with the development of the site could be accommodated within the existing junction, which would operate well within capacity. Moreover, traffic flows on the A29 would also only increase by 0.4% in the AM peak and 0.2% in the PM peak.

#### Biodiversity

40. A Preliminary Ecological Appraisal has been prepared. A review of the survey effort undertaken for the second phase of the Business Park has also been undertaken. It was concluded there were no known ecological constraints that would prevent the proposed development, subject to the following measures being incorporated:

- a soft landscaping scheme that includes a high proportion of native species and non-native species that are known to benefit wildlife;
- the immature tree planting in the north-western corner of the site should be managed to improve the condition of this habitat type. Specimens in poor condition should be removed;
- consideration should be given to creating a wetland habitat, utilising the natural drainage in the area;
- the provision of a reptile receptor site;
- bat roost and nesting opportunities; and
- the inclusion of refugia/hibernacula.

#### Drainage and flood risk

41. Assessment work has demonstrated that the site is within Flood Zone 1, whilst there are some areas of low to medium flood risk within the site, which concerned depressions and an existing ditch running north from Cray Lane. It was recommended that a route for surface water through the development from Cray Lane should be retained. There is no recorded groundwater flooding incidence within the site.

42. A framework SuDs strategy has been developed which seeks to restrict surface water discharge from the site to the QBAR greenfield run-off rate. The masterplan identifies an area in the north western portion of the site for an attenuation basin. It will be sufficiently sized to accommodate flows up to and including the 1 in 100 year event, plus an allowance for climate change. It will also include a freeboard for exceedance events. The design will provide the opportunity to reduce flood risk within the site and the wider area.

43. Southern Water have confirmed that there is existing capacity within the local sewerage network to accommodate an employment development of over 7,400sq.m (c.80,000sq. ft) of new floorspace.

#### Landscape

44. A Landscape and Visual Feasibility Study considered the site's opportunities and constraints and made a series of recommendations to mitigate the landscape and visual impact of the proposed development.

#### Employment location

45. There continues to be a strong demand for office, storage and distribution uses at Broomers Hill Business Park. The first phase of the Business Park is fully occupied and has been for approaching a decade. It has also been confirmed in a letter provided by the landowner's property agents, Henry

Adams, which is provided at Appendix 5 of this representation. The employment site has therefore been successful at attracting and retaining occupiers.

46. As indicated in the landowner's agents' letter, the proposed development has the **"potential to provide a range of unit sizes that will be suitable for both new and established businesses in the area."** Further employment development in this location could assist address some of the LPA's concerns relating to employment land listed in paras. 17 and 18 above.
47. WTL are already aware that two existing tenants, including their major tenant, Spellman High Voltage Electronics Ltd, have outgrown their existing premises and would like additional space. In addition, WTL are also seeking to relocate from their Billingshurst headquarters and are considering relocating to the Business Park. This additional space could therefore prevent three significant employers leaving the District to seek suitable alternative employment premises elsewhere.
48. Given the strong historic and emerging demand for employment space at the site, it is entirely appropriate that the emerging HDLP supports the expansion of Broomers Hill Business Park and proposes, in line with the Pulborough Neighbourhood Plan, to allocate Site EM3 for employment generating uses.
49. Having regard to the technical work underpinning the HDLP, work prepared on behalf of the landowner and evidence of market demand for additional employment land on the site, WTL consider that the proposed allocation at Site EM3 of Strategic Policy 29 is **justified, effective and consistent with national planning policy**. It is therefore a sound proposition.

**(f) Is the geographical application of this policy clear?**

50. WTL do not have any comments in relation to Question (f).

**LRM Planning**  
**November 2024**



# Appendix 1. Correspondence with the LPA concerning planning permissions DC13/1048 and DC/16/2006

[REDACTED]

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**From:** Steffan Harries [REDACTED]  
**Sent:** 28 September 2016 12:38  
**To:** Colin Rayner  
**Cc:** Neil Mantell  
**Subject:** Fwd: Codmore Hill

Hi Colin,

See below confirmation of receipt of the photos of the start on site, for your records.

**Steffan Harries** Principal Planner  
BSc (Hons) MA (UD) MRTPI  
LRM Planning Ltd.

[REDACTED]  
website: [lrmplanning.com](http://lrmplanning.com)  
twitter: @lrmplanning

Correspondence Address: [22 Cathedral Road, Cardiff, CF11 9LJ](https://www.gov.uk/government/world/cy/cathedral-road)  
Registered Address: Nyewood Court, Brookers Road, Billingshurst, RH14 9RZ

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Begin forwarded message:

**From:** "Kulik, Peter" [REDACTED]  
**Date:** 28 September 2016 at 11:59:28 BST  
**To:** 'Steffan Harries' <[REDACTED]>  
**Subject:** RE: Codmore Hill

Dear Steffan,

I can confirm that your photographs have been received.

Regards

Peter Kulik  
Planning Officer

[REDACTED]

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Horsham District Council: Parkside, Chart Way, Horsham, West Sussex RH12 1RL

[REDACTED]

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**From:** Steffan Harries [REDACTED]  
**Sent:** 23 September 2016 17:16  
**To:** Peter Kulik [REDACTED]  
**Cc:** Neil Mantell; Colin Rayner  
**Subject:** FW: Codmore Hill  
**Attachments:** 20160923165126269.pdf

Afternoon Peter,

I'm aware you're on annual leave until Tuesday next week, but please find attached photographs to confirm that a start on site has been made in order to safeguard the site ahead of the expiration of the consent tomorrow.

I'd be grateful if on your return to the office you could acknowledge these photographs to confirm that from Horsham DC's perspective, the consent has been implemented.

Kind regards,

Steffan Harries Principal Planner  
BSc (Hons) MA(UD) MRTPI

PLEASE NOTE OUR NEW LANDLINE NUMBER AND ADDRESS AS OF 4TH JULY 2016:

[REDACTED]  
website: [lrmpanning.com](http://lrmpanning.com)  
twitter: @lrmpanning

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ

-----Original Message-----

From: Colin Rayner [REDACTED]  
Sent: Friday, September 23, 2016 4:57 PM  
To: Steffan Harries <[REDACTED]>  
Subject: FW: Codmore Hill - Phase 2 Development

Steffan

Re the above, see attached photographs taken this afternoon, showing progress made with the kerbing works.

Regards

Colin Rayner  
Property Manager  
Colin Rayner | Property Manager | The Lamb Group | Nyewood Court | Brookers Road | Billingshurst | West Sussex | RH14 9RZ | [REDACTED]  
[colinrayner@wtlholdings.com](mailto:colinrayner@wtlholdings.com) | [www.wtlholdings.com](http://www.wtlholdings.com)

-----Original Message-----

From: s [REDACTED]  
Sent: 23 September 2016 16:51  
To: Colin Rayner  
Subject: Message from "RNP002673C523ED"

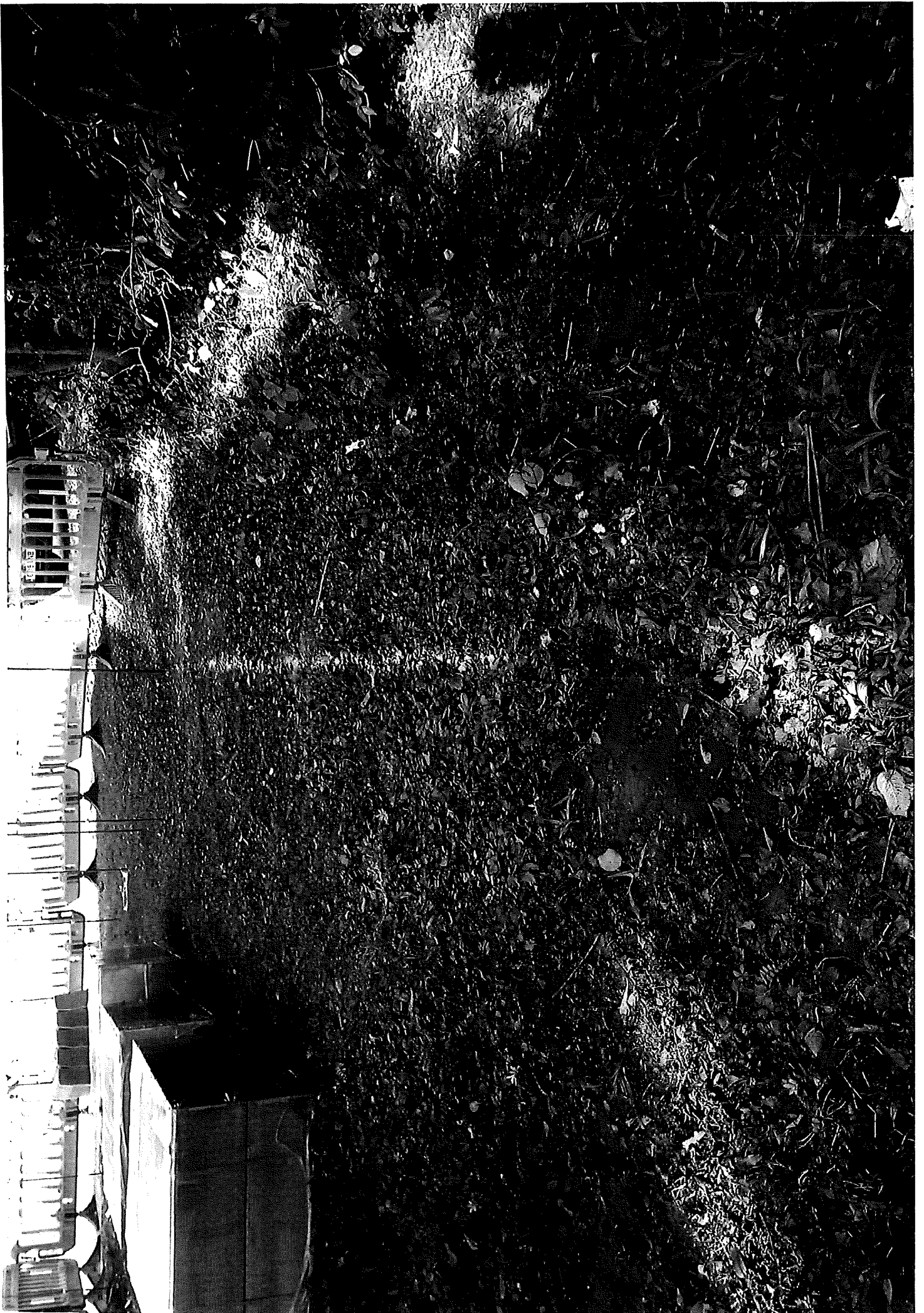














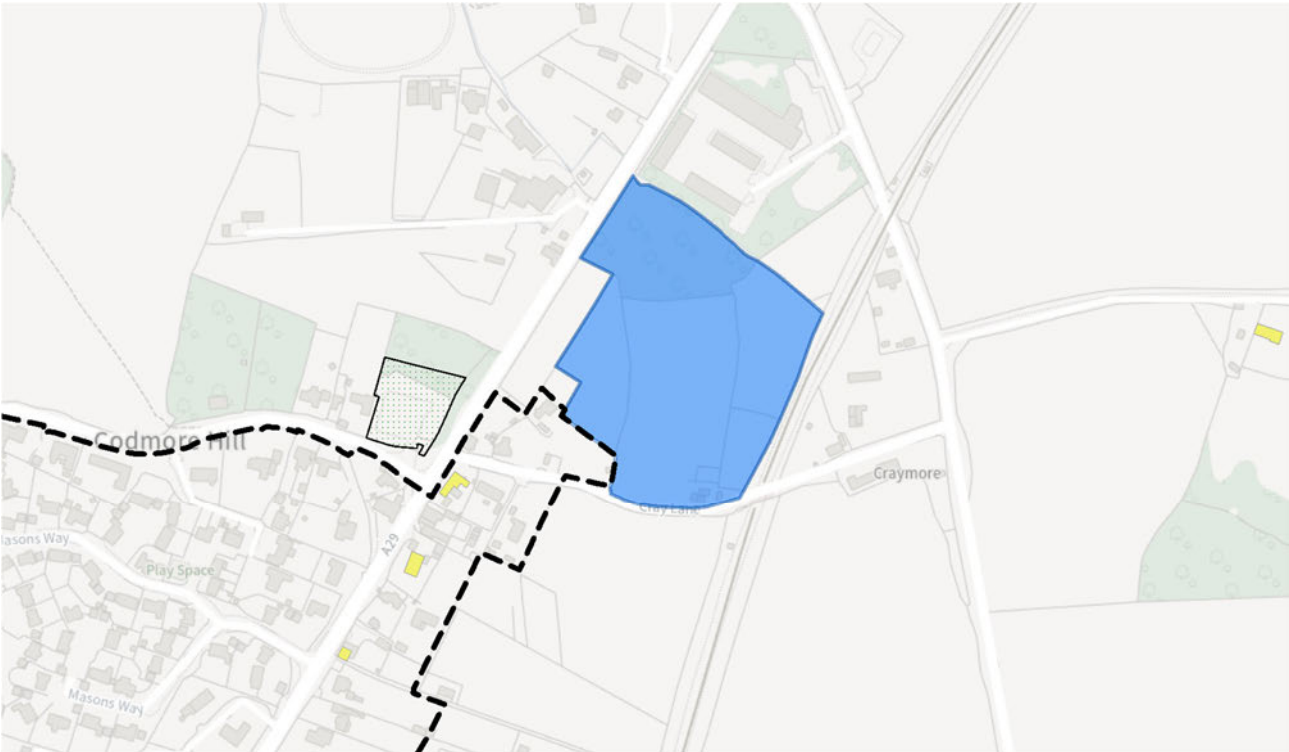
## Appendix 2. Policy 7 of the Referendum version of the Pulborough Neighbourhood Plan

Pulborough Neighbourhood Plan allocates Land South of Broomers Hill Industrial Estate as shown on the Policies Map (3 Ha) for commercial uses only. Support is given to any proposal subject to the following criteria being met:

- i. Support is given to the development of commercial uses (class B2, B8 and E) at Land South of Broomers Hill. Particular support is given to providing premises for start-up and expanding commercial uses;*
- ii. Safe access is achieved off either the A29 or Broomers Hill Lane;*
- iii. Safe access through the southeast corner of the site should be provided for workers/visitors using non-motorised travel;*
- iv. Existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition from proposed development to the wider open countryside and help to minimise the visual impact of the proposal;*
- v. Any development shall be informed by a full ecological and biodiversity survey and assessment report. Any recommendations arising from the assessment or study in order to make the development acceptable in planning terms must be implemented. A net gain of biodiversity on the site is required;*
- vi. Development proposals should ensure there is no net increase in surface water run-off taking into account climate change and there may be opportunities to reduce existing run-off rates through the use of sustainable drainage (e.g. rain gardens and green roofs).*
- vii. Development proposals should include the provision of good broadband connectivity as highlighted in Priority 4 of the Horsham District Economic Development Strategy.*
- viii. Any development proposal of over 1000 square metres should meet Building Research Establishment Environmental Assessment Method (BREEAM) Very Good standards;*
- ix. Any proposal should demonstrate it is appropriate to the local context. Particular regard should be given to design, height, massing and use of materials appropriate to the local context in line with the Pulborough Design Statement;*
- x. All external lighting shall be designed and laid out to minimise light pollution;*
- xi. Any development should conserve and enhance the setting of existing listed buildings adjacent to the site;*
- xii. The Habitats Regulations Assessment April 2020 identifies this site as being close to a specific bat flight path (see their page 61). Schemes proposed for a site shall identify and retain those features on site that are particularly important for bats and any impacts likely to cause disturbance to important routes used by bats for foraging or commuting; and show how and where any external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and PULBOROUGH PARISH NEIGHBOURHOOD PLAN – SUBMISSION PLAN JULY 2024 38 technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory;*
- xiii. Developers should submit a Construction Environment Management Plan showing how they will avoid damaging local water quality by preventing water runoff from the site (see page 8).*

***xiv. All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. All proposals should look to be compliant with the Horsham Strategic Policy 9: Water Neutrality with Horsham District Local Plan (2023-2040).***

# Appendix 3. Emerging Local Plan policies map



The proposed allocation is shown in blue, with the dashed line delineating the built up area boundary.



**Appendix 4. The revised built up area boundary as shown in the Referendum version of the Pulborough Neighbourhood Plan**





# Appendix 5. Commercial property advice

Mr C Rayner  
WT Lamb Properties Ltd  
Nyewood Court  
Brookers Road  
Billingshurst  
West Sussex  
RH14 9RZ

22/11/2024

Dear Colin

The proposed scheme has potential to provide a range of unit sizes, that will be suitable for both new and established businesses in the local area.

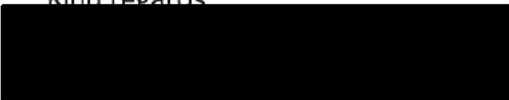
It is appreciated that it is currently schematic in nature, and it will be important to give further consideration to internal fit out and use of materials when designing the detail. Loading, parking and circulation space are also important considerations that should not be comprised.

The phased format of the development will also require consideration, it being your aspiration to build the scheme out over the duration of the neighbourhood plan period.

Whilst it is difficult to predict future demand for space, the market for industrial property currently remains buoyant, despite the Covid pandemic, and there is no reason why this shouldn't continue into the future.

This scheme offers accommodation that is different to other schemes in the area and builds upon the success of the existing adjacent Estate and the demand that exists for the consented but as yet undeveloped second phase.

Kind regards

  
Andrew Algar – Head of Commercial Property

  
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