

The Stanley Building, 7 Pancras
Square, London, N1C 4AG

www.powerhausconsultancy.co.uk



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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 7 – ECONOMIC DEVELOPMENT**

MATTER 7, ISSUE 1 – Whether the approach to employment land and supply is justified, effective, consistent with national policy and positively prepared?

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?

Verve Investments Ltd (now referred to as “Verve”), clearly supports the employment allocation of the land to the West of Graylands Estate Site EM2, however, it is irrational to exclude the East land, which could make a meaningful contribution to employment (and housing) needs within the district, particularly where there are many strategic sites the Council is relying on to meet the identified needs (North Horsham Strategic Allocation to name one) that have not yet meaningfully commenced delivery of homes and jobs.

Graylands Estate is already served by existing infrastructure and there are no impediments to delivery of additional employment at Graylands. It will not compete with the strategic allocation at North Horsham as this is identified for office space (including some B2 and B8 uses) and given the value difference between these uses, is highly likely to gravitate to an office form of employment floorspace. Permission was granted for North Horsham in 2018 and it is now nearly 2025. Such a large scheme is highly likely to take 10-15 years to complete (if not longer) once it starts and the first reserved matters has only just been submitted earlier this year for 179 homes.

The evidence submitted by Verve with the initial Regulation 18 representations, included a report by Richard Graves Associates “*Extended Phase 1 Habitat Survey Report (July 2020)*” which demonstrated that there were no ecological reasons why the East land (as well as the West land) could not come forward for development with appropriate mitigation. There are no barriers to integrating the East land with the existing Graylands Estate in the same way as the West land allocation will do. The East land is available, suitable and achievable. The allocation of the East land will build in some resilience to the delivery of new employment floorspace within the light industrial, general employment and distribution uses (ie not competing with town centre uses elsewhere). An assessment undertaken for the evidence base of the Local Plan suggested that the East land be allocated for employment, as attached for convenience at Appendix 1. The Masterplan submitted with the Regulation 19 consultation clarified the existing employment and residential uses Graylands Estate, alongside the proposed uses for the West and East land. It is attached for convenience at Appendix 2.

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

The 10 criteria of Strategic Policy 29 read as statements of intent where relevant to a site’s specific circumstances, rather than all criteria needing to be met in delivering the employment allocations. There are clearly some conflicts where Class E g (i) offices would not be appropriate, other than as an ancillary use in general employment locations such as Graylands and criterion 3 is an example of this. It would be more logical to refer to Class E g (ii and iii) rather than include offices which other than allocated sites and town centres are not supported in locations such as Graylands (other than as ancillary floorspace).

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

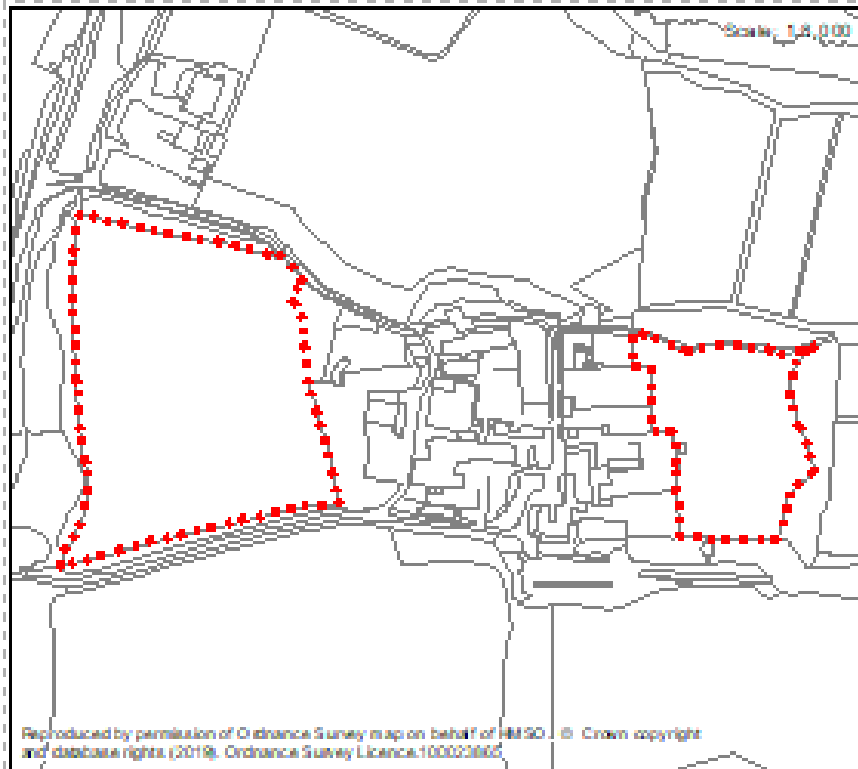
Verve supports the allocation of Site EM2 and can confirm that the ancient woodland identified located nearby can continue to be protected with a suitable buffer zone where required. This was reviewed in the Phase 1 Habitat Survey undertaken on its behalf in 2020. The operation of the Graylands Estate has no impact on the nearby waste management site and is not seen as a constraint to delivering the employment land. The same points would apply to the allocation of the East land at Graylands Estate.

Appendix 1: Graylands Site Assessment

Site Name: Graylands Estate

SHELAA Ref number: SA363

Site Map:



Parish: North Horsham

Site Area: 4.4 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. There can be smells and / or disturbance from the Landfill site, quarry and Brickworks to the north and southwest of the site.

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.

Environmental Considerations: The north border adjoins a public right of way.

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: The western and north eastern boundary adjoin Ancient Woodland. A Site of Special Scientific Interest (SSSI) and Local Wildlife Site (LWS) lie near the northern boundary. The impact of further development in these sites would need to be considered.

Archaeology: 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).

Flooding: The site does not lie within an area identified as at risk of flooding.

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

Overall Summary:

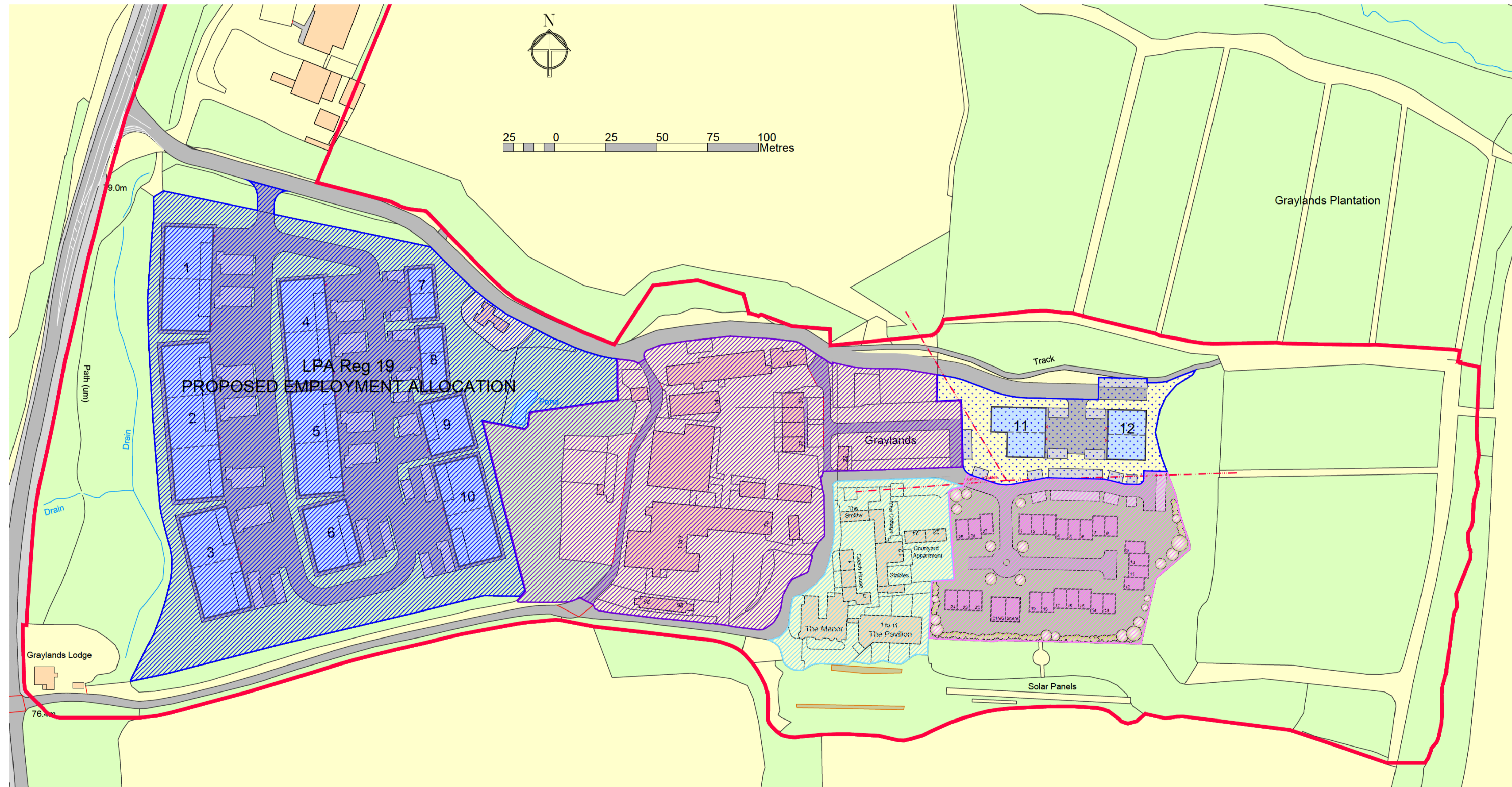
The two fields lie within the countryside adjacent the North Horsham development allocation. The landowner seeks housing and/or employment. Between the split site is Graylands Estate, an employment / mixed use area which is a proposed Key Employment Area. It is not considered the split site should be allocated for residential, with significant land already allocated for this use nearby. It is considered to have potential for employment as an extension to Graylands Estate particularly to the east subject to appropriate regard to the constraints of the site. This would provide additional employment opportunities for new residents in the North Horsham area. It is recommended the site be allocated for employment.

Employment Floor Space / Area : 4.4ha

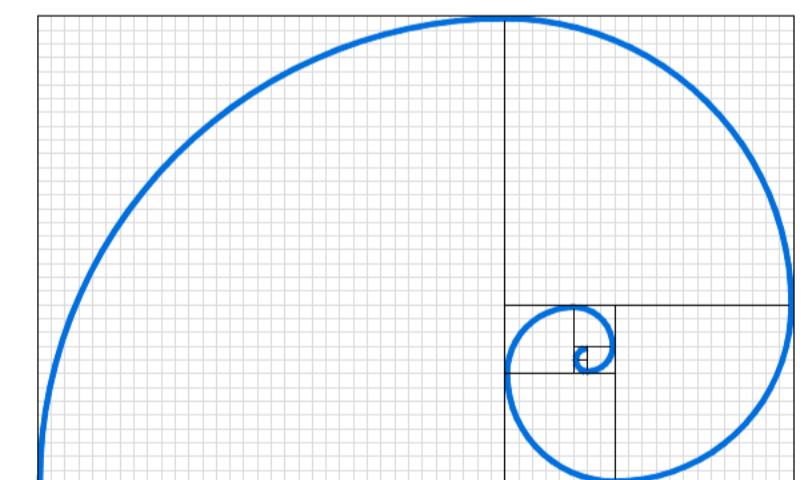
Appendix 2: Graylands Estate Masterplan, Existing Residential and Employment Uses and Proposed Uses for East and West Land

NOTES
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| 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

DRAWN GS DRG No. DATE Feb 2024 SCALE 1:1250 @ A1
 CKD C.J.L. 6323 P 05
 REVISION A