# HORSHAM DISTRICT COUNCIL CONSULTATION

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| **TO:** | Horsham District Council – Planning Dept |
| **LOCATION:** | Unit 18 Billingshurst Trade Park Stane Street Billingshurst West Sussex RH14 9LZ |
| **DESCRIPTION:** | Erection of a single storey building (3,110 sq.m gross floorspace / 3,019sqm GIA) with ancillary external storage/sales area to accommodate either: 1. employment (E(g(iii)/B2/B8); or 2. retail warehouse use E(a); with associated customer/staff car park, landscaping and two adjoining access roads. |
| **REFERENCE:** | DC/24/1452 |
| **RECOMMENDATION:** | ~~Advice / No Objection / Objection / More Information / Modification /~~ Refusal |

**SUMMARY OF COMMENTS & RECOMMENDATION:**

For the purposes of planning policy 'employment use' relates to Use Classes E(g), B2 and B8. The need for such uses is assessed and evidenced via the Economic Growth Assessments. The need for other 'employment generating' uses are evidenced via other documents such as Retail Needs Study, Retail and Leisure Study, Hotel and Visitor Accommodation Study. For the creation of sustainable communities and a sustainable economy a range of jobs meeting different skill sectors must be available. It is not appropriate to override a need for a particular use on the basis more jobs would be created for an alternative use because the type of work and economic benefits are not likely to be comparative.

Paragraph 95 of the NPPF makes clear that retail permission should not be granted it if would have a significant adverse impact on two specified situations – impact on centre(s) in catchment and/or impact on town centre vitality and viability (including local consumer choice and trade) in the centre and wider retail catchment. PPG makes clear a judgement as to whether the likely adverse impacts are significant needs to be taken in light of local circumstances. Account of all material considerations is also necessary.

The site lies within a larger, formerly agricultural, site permitted in 2019 for employment and ancillary uses which is still under construction. The proposal relates to land with permission for employment use (B1c, B2, B8 Use Classes). The loss of employment land (c.8,000sqm) and provision of retail in this location would be contrary to both national and local planning policy, and guidance within the Billingshurst Village Centre SPD 2017 which makes clear the focus for retail that serves its community is within the village centre. The scale of the proposed retail unit is significantly out of keeping and proportion with the character and scale of the village and the retail offer within the village centre, if not the character and scale of retail in the District and retail offer within Horsham town centre. The proposed retail would have a significant adverse impact on Billingshurst centre if not other centres, including Horsham town and Broadbridge Heath Quadrant, and would impact upon their vitality and viability and wider retail catchment. The flexibility sought that enables the delivery of retail is therefore not supported.

The loss of employment land would be contrary to Strategic Policies 7 and 9, particularly bullet 2 in both, of the HDPF. There is a lack of evidence to demonstrate the site / premises is no longer needed and / or viable for employment use. It would also be contrary to Strategic Policy 30 (particularly bullet 7) of the Submitted Local Plan. The scale of this speculative proposal in respect of employment fails to reflect the flexibility necessary to help address the identified employment needs of the District.

The proposed provision of retail with ancillary parking would be contrary to Strategic Policy 13 of the HDPF which encourages main town centre uses within the defined areas of town and village centres which should be read in conjunction with Strategic Policy 12, which recognises the development hierarchy for the District, and sets a hierarchy for the district's town and village centre. In this respect it also fails to align with Strategic Policies 5 and 6 as well as the respective policies in the Submitted Local Plan (Strategic Policies 35, 36, 4 and 5).

**MAIN COMMENTS:**

**The Proposal:**

Despite the two alternative uses sought, the proposal is fundamentally seeking a building with outdoor 'garden centre' space and ancillary parking for an identified retailer, The Range. The Planning Statement makes clear The Range requires a minimum of 3,119sqm GEA floorspace (3,020sqm net floorspace) of which 250sqm is required for sale of food and drink for consumption off the premises, and adjoining land for 418sqm external garden centre area. Requiring a minimum site area or around 0.75 hectares. There is no clear justification provided for the size of such an employment unit or ancillary parking.

**Key Context:**

Horsham district is rural with only one main primary town, Horsham town, and a number of smaller settlements as set out in Strategic Policy 3 of the Horsham District Planning Framework (HDPF). It makes clear Horsham town acts as the key hub for the district, and that any development should be of an appropriate nature and scale to maintain the characteristics and function of the settlement and settlement hierarchy. Billingshurst is one of eight identified secondary settlements.

In recognition of the important role of Horsham town within the district, Strategic Policy 5 of the HDPF promotes the prosperity of Horsham town and seeks to maintain and strengthen its role as the primary economic and cultural centre within the rural District and seeks to retain and enhance the retail mix in Horsham town. Strategic Policy 6 of the HDPF recognises the Broadbridge Heath Quadrant as a redevelopment opportunity area to complement other redevelopment in Horsham town to benefit the district and secure the vitality and vibrancy of Horsham town. The Broadbridge Heath Quadrant acts in effect as the identified primary 'out of town' retail location.

Table 4.5 of the Northern West Sussex Economic Growth Assessment makes clear that Horsham town is the primary commercial settlement within the district providing 37.8% of jobs, in comparison, the second largest is Southwater at 4.5% and third is Billingshurst at 3.8%. This highlights the primacy of Horsham town.

**Application Site – relevant planning history:**

The application site lies within a wider site which obtained permission in June 2019 for employment (c.19,070sqm), petrol filling station with ancillary retail (c.465sqm), drive through coffee unit (c.200sqm), parking and other ancillary infrastructure (App Ref: DC/18/2122). DC/18/2122 sought to deliver 13 units ranging in size from 268sqm to 501sqm in the Phase 1 and larger units in phase 2 (593sqm to 2,065sqm). Permission was on balance considered to be acceptable based on the submission of additional employment 'overriding need' evidence submitted by the applicant. The applicants evidence indicated there were existing employment businesses within Billingshurst in need of modern employment space, which aligned with the community's aspiration to see employment relocated from some of the old industrial estates within the village. To date, this has not materialised and new businesses have moved into the units made available many national with trade counters in nature.

A number of applications amending the original scheme have been submitted since 2019. One of particular note, which was permitted by virtue of its individual merits, sought a change of use of part of the site (c.7,300sqm) to retail to deliver a new 1900sqm GIA foodstore/Lidl (App Ref: DC/21/0321).

The applicant seeks employment (B1c/B2/B8) on an adjacent site as evidenced by a couple of applications (App Refs: DC/21/0748 and DC/22/0566), which were not granted, and Local Plan representations including their recently submitted Local Plan Hearing Statement (M7.11). This suggests that the applicant accepts the need for employment on the site. Indeed, in respect of the Appeal in relation to the refusal of DC/21/0748, which was dismissed, the applicant stated there is an immediate short term need for modern fit for purpose employment space.

**Retention of site for employment:**

For the purposes of planning policy 'employment use' relates to Use Classes B2, B8 and E(g) (which was formerly B1). The need for such uses is assessed and evidenced via the Economic Growth Assessments. The need for other 'employment generating' uses is evidenced via other documents such as Retail Needs Study, Retail and Leisure Study, Hotel and Visitor Accommodation Study. For the creation of sustainable communities and a sustainable economy a range of jobs meeting different skill sectors must be available. It is not appropriate to override a need for a particular use on the basis more jobs would be created for an alternative use because the type of work and economic benefits is unlikely to be comparative. Indeed, to be too reliant on any one employment/employment generating sector affects sustainability and can have significant consequences if that sector fails or is significantly affected by outside factors.

The reason this distinction is made is primarily because B2 uses, as evidenced by their separation from E(g) use class, include uses that are not suitable within residential areas as they may give rise to detriment to amenity. Both B2 and B8 uses classes may require large sites versus the number of jobs they offer nonetheless they offer a needed type and quality of job that is not compensated for by other employment generating uses. Both uses often need good access to the strategic road network. As a consequence of these factors, sites for B2 and B8 uses are less readily available than other employment or employment generating uses. This is highlighted by their separation from the E Use Class which is very much geared to town centre uses. In addition to this, notwithstanding the numbers of jobs provided, retail jobs do not provide for the same level of skill, quality or nature as the range of employment jobs that could be provided on a site.

The Northern West Sussex Economic Growth Assessment (Jan 2020) notes the important role existing employment sites in the District play in accommodating economic development activity – such as paragraphs 9.15, 9.21 and 9.22. It highlights that the continued protection of these sites is needed to ensure economic growth is not undermined by a lack of sites and premises. This recognises the difficulties that exist around finding suitable locations for B2 and B8 use classes.

As raised above under 'key context', the principle of development of this former agricultural site was first established relatively recently in June 2019. Permission was granted on the basis of an overriding need for employment, which would provide modern units enabling existing businesses within the older estates within Billingshurst to relocate (an aspiration of the community), and a stated ability to deliver quickly. There is no evidence to suggest this principle for employment development no longer exists.

A need for employment land is also accepted by the applicant given their original proposals for the site as well their ongoing proposals to provide employment on adjacent land as submitted by application (DC/21/0748 and DC/22/0566) and in their response to the Local Plan consultations. The Council does not agree with the applicant that the need for employment requires additional land, however, there appears to be agreement that there is a need for employment in this location.

Paragraph 86 of the NPPF (Dec 2024) includes reference to the national industrial strategy and the corresponding footnote refers to 'Invest 2035: The UK's Modern Industrial Strategy' and identifies priority sectors for growth and support as: advanced manufacturing; clean energy industries; creative industries; defence industries; digital and technology businesses; financial services; life sciences; and professional and business services. Paragraph 86.c of the NPPF expects particular regard to be paid to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics. Paragraph 87 of the NPPF also makes clear provision should be made for storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation. This highlights there is a need for sites for E(g), B2 and B8 Use Classes with good accessibility, such as the application site.

A continual encroachment of retail and/or other uses would undermine the primary employment use of the Trade Park and could undermine the ability for the employment estate to properly function for employment and meet the needs identified in the NPPF.

The loss of employment land to retail with ancillary parking (c.8,000sqm) would be contrary to Strategic Policies 7 and 9, particularly bullet 2 in both, of the HDPF. There is a lack of evidence to demonstrate the site / premises is no longer needed and / or viable for employment use. It would also be contrary to Strategic Policy 30 (particularly bullet 7) of the Submitted Local Plan, which forms a Council agreed spatial strategy for the District for the period 2023-2040. It forms a material consideration notwithstanding the Inspector's postponement of some of the Hearing sessions primarily due to the complexities of water neutrality and its impact upon the spatial strategy. Strategic Policy 30 protects existing employment sites and premises. In respect to other uses, it makes clear indoor leisure uses (E(d) and F2(d) Use Classes) would be supported provided they do not prejudice surrounding employment and minimise impacts on amenity, it does not promote retail within employment sites.

In addition to this there is a lack of evidence that the unit would be appropriately flexible and adaptable/divisible to enable different sized businesses to occupy the space so that it meets identified employment needs which, within Horsham District, is predominantly from micro businesses as evidenced by the Northern West Sussex Economic Growth Assessment, January 2020. This is important in order to help secure viability of the unit given it is speculative in respect of 'employment' use.

**Provision of large scale retail unit:**

As highlighted above under the heading of 'key context', Horsham town is the primary town, acting as a hub within the rural district. Broadbridge Heath Quadrant is the only identified out of town location where town centre uses would be supported and proposals should complement other redevelopment in Horsham town to meet the needs of district and secure the vitality and vibrancy of Horsham town itself. The Local Plan therefore clearly sets out the primacy of Horsham town and Broadbridge Heath Quadrant, and a clear hierarchy in relation to retail centres and proposals, which should be taken into account within impact assessments and/ or sequential tests.

Any impact assessment should be in compliance with the checklist steps for impact tests set out in the PPG (Paragraph: 018 Reference ID: 2b-018-20190722). Assessments

should take into account other relevant developments and changes in market, which includes the cumulative impact of retail development. Retail Impact Assessments are based on a number of assumptions. The PPG therefore makes clear that a judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. It also highlights that consideration should be given to all material considerations.

Paragraph 95 of the NPPF makes clear that permission should not be granted if it fails to satisfy the sequential test or is likely to have a significant adverse impact on one or more of the considerations in paragraph 94. This includes two specified situations – impact on investment in a centre(s) in the catchment area and/or impact on town centre vitality and viability, including local consumer choice and trade in the centre and wider retail catchment (as applicable to the scale and nature of the scheme).

Paragraph 92 of the NPPF confirms that not all out of centre sites should be treated as being sequentially equal and that a judgment will need to be made about whether or not certain locations are more accessible and well-connected and have greater prospects of connecting with established centres. In this respect, given the scale of the development and the Zones identified in the applicant's assessments and the Horsham Town Retail & Leisure Study 2017, the focus should be on Horsham town centre and then edge of centre / out of town in respect of Horsham town taking into account the policy promotion of Broadbridge Heath Quadrant and then on any other centres that could be affected, such as, Billingshurst, Pulborough, Southwater, Petworth.

A relatively recent appeal decision to the Secretary State (SoS), Appeal Reference - APP/P0119/V/17/3170627, highlights what is meant by a 'reasonable period' in respect of the sequential assessment:

"*…what would be reasonable and appropriate will depend on the particular circumstances of the sequential site and the proposal that it is expected to accommodate."*

Paragraph 94 of the NPPF requires a retail impact assessment where the gross floorspace is 2,500sqm or greater if there is no locally set threshold. It should be noted that the applicant assumes this means gross 'internal floor area', however, NPPG 'Town Centres and Retail' (2014) makes clear in a footnote that this is gross retail floorspace / gross external area - so the total built floor area measured externally, which is occupied by a retailer(s), excluding open areas used for storage, display or sale of goods.

In respect of Horsham district a judgement as to whether the likely adverse impacts are significant very much needs to be taken in light of local circumstances. The proposal seeks significant retail floorspace within Zone 1 as identified in the applicant's impact assessment which is based on the Zones within the Horsham Town Retail & Leisure Study 2017. Zone 1 is the area within which Horsham town is fundamentally more attractive to customers within the Zone than other key competing centres which are (in descending order) identified to be Crawley, Worthing, Brighton, Haywards Heath and Guildford. Billingshurst falls within Zone 1 which makes clear the primary town centre is Horsham town in respect of both impact assessment and sequential test. However, this does not mean regard to the impact upon Billingshurst village centre and respective regard in the sequential test is not also relevant. In terms of future change, the Horsham Town Retail & Leisure Study 2017 noted there was little committed to significantly alter the market share between these locations but that this should be monitored, particularly given the proposed extension of County Oak Retail Park in Crawley because this could have an impact on Horsham town.

The Horsham Town Retail & Leisure Study 2017 recommends the Council plans for around 7,500sqm net of convenience goods floorspace and 10,700sqm net of comparison goods floorspace to be delivered by 2031 identified for Horsham town but with 6,000sqm to be directed to 'Land North of Horsham' (split 50/50 between convenience/foodstore and comparison goods floorspace – equivalent to the convenience floorspace in Tesco Broadbridge Heath and the comparison floorspace in Homebase at Broadbridge Heath. (NB. the latter is set to close after Homebase went into administration). This leaves 4,000sqm net convenience goods floorspace and 7,700sqm net of comparison goods floorspace to be delivered by 2031 identified for Horsham town. Addressing retail needs should be done via the local plan making process especially if it relates to large scale floorspace provision in relation to Horsham town or the Broadbridge Heath Quadrant and particularly outside of these locations.

The identified need for additional floorspace is focused on Horsham town so that it maintains its current market draw and does not lose out to the other key competing centres located outside the district. To distribute the additional floorspace across Zone 1 would significantly undermine the attraction of Horsham town for customers as it would disperse the retail offer undermining its attractiveness to customers who tend to seek to undertake linked trips, meaning shoppers normally prefer to be able to access several key retailers within a shopping trip. This is facilitated by retailers being in close proximity to each other and represents more sustainable behaviour than travel, often by private vehicle, around Zone 1 to meet shoppers' needs. The Horsham Town Retail & Leisure Study 2017 also recommended an impact threshold of 500sqm gross to ensure edge and out-of-centre retail development proposals are required to undertake a full and detailed impact assessment. This reflects the current provision within Horsham town and highlights the relatively small-scale nature of retail floorspace within the District compared with large urban areas where large retail floorspaces are more commonly located.

The applicant's retail impact assessment (paragraphs 3.18 and 3.19) reflects the Horsham Town Retail & Leisure Study 2017 and aligns with the Zones used. The Study shows, based on a telephone household survey, that a small proportion of residents in the District shop within Billingshurst village. Those that do, reside in the areas near Billingshurst. It reflects that a relatively high proportion of residents in nearby areas use the village for DIY and decorating goods and notes that this is likely to be focused on the Austens home/hardware store on the High Street (14.8% in Zone 8 to the west of the village). Homebase on the Broadbridge Heath Retail Park (within the Broadbridge Heath Quadrant), which has since gone into administration and is closing, offered larger DIY and lighting products and was the key DIY and decorating goods provider for residents respectively (39.5% in Zone 8). The applicants Retail Impact Assessment states this gives considerable scope to reduce the outflow of expenditure locally. However, this overlooks the centre hierarchy within the District whereby Horsham town is the focus for retail floorspace with Broadbridge Heath Quadrant linked for key out of centre provision. Billingshurst is not a key competing centre instead it is very much secondary to Horsham town. Billingshurst centre therefore serves its village and surrounding area for day to day needs but otherwise Horsham town is the key centre to which retail expenditure is to be directed in order for Horsham town centre to maintain its position in the wider market. The applicant also provides no information on potential impact on footfall within respective centres, including Billingshurst, or the required footfall of the proposal to be viable.

The scale of the proposed floorspace and offer (as detailed in paragraph 7.14 of the Planning Statement and paragraph 4.6 of the applicants Retail Impact Assessment) is significantly out of keeping and proportion with the character and scale of the settlement

and the town centre hierarchies. It is out of keeping and proportion with the character and scale of Billingshurst, if not the character and scale of retail in the District and retail offer within Horsham town centre.

Indeed, the offer of The Range is not dissimilar to the full offer of a village centre and is uncharacteristically large in floorspace even in terms of Horsham town centre and its out of centre sites. For example, the proposed B&Q at Broadbridge Heath Quadrant is 1,861sqm (DC/23/1133). The majority of retail units within Billingshurst's centre are no larger than 80sqm. There are 61 unit in the village centre. By way of comparison this equates to circa 5,000sqm so this proposal for 3,110sqm seeks to increase upon the village centres floorspace by more than 60%. This, combined with the retail offer already provided at Billingshurst Trade Park, especially when the 'employment' trade counters are taken into account alongside Lidl (1,900sqm GIA) and the convenience store (c465sqm) at the petrol filling station and the drive through (c.200sqm), equates to a competing new centre. It is making the Trade Park a retail destination attracting linked trips and diverting shoppers away from the High Street/village centre and potentially other centres including Horsham town and Broadbridge Heath Quadrant. It is reasonable to assume it will alter shopping habits and significantly undermine Billingshurst centre's retail offer, including its historic character, as the profitability of the smaller units are more susceptible to failure by a small drop in footfall/market share (both existing and potential occupants that would have sought to offer similar goods to The Range). As the range and variety of offer decreases within the centre this will in turn decrease the centre's attractiveness to residents and divert more of them to the Trade Park.

The applicant applies a 2026 'design year' on the basis of gaining permission in 2024 so the design year would estimate the impact after one settled year of trading. Detailed justification for this is not given even though PPG (Paragraph: 018 Reference ID: 2b-018-20190722) makes clear the appropriate time frame for assessing impact should focus on the first five years, as this is when most of the impact will occur, and the 'design year' for impact testing will need to be selected to represent the year when the proposal has achieved a 'mature' trading pattern. They provide design year turnover figures in table 3.1 which equate to £4.95 million which are set within 2014 prices. This is not considered to appropriately assess the impact. A later year should form the 'design year' and data should be given in respect of existing and predicted Billingshurst centre turnover in this respect as well all other centres likely to be impacted.

The site's location at the northern tip of the village is not well located to the planned growth of Billingshurst within Strategic Policy HA4 of the Submitted Local Plan nor the out of centre Mole Valley Country Stores.

The Sequential Test provided in the Planning Statement fails to consider all reasonable alternative sites. It applies its own catchment of Zones 1, 6 and 8 without regard to the identified catchment of these Zones respectively. It therefore only focuses on Billingshurst in terms of finding an alternative site. It then unsurprisingly, given the scale of the village and its centre, concludes that no alternative sites are identified. It does not consider Mole Valley Country Stores as an alternative, a site previously considered in respect of the Lidl application and where the lease is to be reviewed in 2027. Given the site's location within Zone 1, the respective retail hierarchy within the District and the scale and nature of the proposal (primarily comparison retail) the sequential test should focus on Horsham town and, due to the local planning policies, also Broadbridge Heath Quadrant. It therefore fails to consider all relevant sites within the sequential assessment as appropriate for a scheme of this size in a rural district. This includes regard to Homebase, currently located within the Broadbridge Heath

Quadrant, which is closing and should have been considered within any sequential assessment.

With a scheme of this size in Billingshurst it is considered a 'reasonable period' would include consideration of such proposals through the plan making process to properly assess the need and the availability of other sites within or close to Horsham town centre for such a large retail floorspace and consequent impacts of delivery in a lower tier centre.

The impact assessment does not address all aspects appropriately. It fails to reflect the full impact upon retail in the District, with respective focus on Horsham town and Broadbridge Heath Quadrant, including the Highway Depot site at Broadbridge Heath Quadrant, and also the potential impact upon second tier centres including Billingshurst village.

The proposed retail offer could also impact Billinghsurst town centre as it would potentially compete for staff from within the village therefore making it hard for existing stores to find staff. This is especially true as large national operators can be more able to add incentives by offering staff discounts etc. which may not be the case for small operators that make smaller margins on every product sold (and due to space constraints often have to carefully balance a need to offer a wide range of products, in order to remain attractive to customers, with those that provide the highest return). Covid has hit many town centres hard. Fortunately, centres in Horsham District have recovered well, however, this does not mean they have not been affected and that further challenges can be weathered.

For the reasons highlighted above, the provision of such a large national retailer at this out of centre site would have a significant adverse impact on investment in Billingshurst centre, if not Horsham town and the Broadbridge Heath Quadrant, and the centre's vitality and viability due to Billingshurst residents and other customers being drawn to the Trade Park to undertake their linked shopping trips. The provision of such a large store will divert trade from within Zone 1 from Horsham centre and Broadbridge Heath Quadrant undermining the attractiveness of this key centre within the District. It will have a significant impact on consumer choice and the overall vitality and viability of the respective village and town centres.

It is not considered the permission for a new 1900sqm GIA foodstore/Lidl within a c.7,300sqm plot on the site sets a precedent (DC/21/0321). It was justified on its individual merits and delivered convenience retail which was considered complemented the village offer and was warranted given the growth of the village. Due to other amendments to the site the amount of employment floorspace originally granted was retained. Paragraphs 1.26 to 1.30 of the Retail Needs Study 2010 noted that Billingshurst was not sufficiently meeting the convenience needs of the surrounding residential area, notwithstanding this the village centre was considered to be fulfilling respective needs (N.B. the zones applied in this study are different to the ones used in 2017 and the applicant's submission). It does not justify an accumulative increase or provision of retail on employment land especially at the scale proposed for comparison goods. The proposed scale of offer will be much wider than local. Indeed, the cumulative impact with Lidl, given Lidl also provides a non-food offer in addition to food, needs to be taken into account. As highlighted in the Horsham Town Retail & Leisure Study 2017 the Lidl foodstore in Dorking was noted to have had a strong influence on food shopping patterns with a potential element of linked trips to the non-food offer also. This proposal,

based on the evidence submitted for The Range, would include some convenience/food sales alongside comparison goods including garden centre (250sqm convenience, 2,770sqm comparison, 418sqm garden centre).

The applicant suggests retail on this part of the site is needed to help unlock employment, however no viability evidence has been submitted or information on the extent of enabling development is necessary. Irrespective of this, the proposed store will be more than complementary and not appropriate in this location, in conjunction with the other retail elements within the Trade Park it will compete with and potentially dominate the current offer within the village.

For the reasons summarised above, the proposal is contrary to Strategic Policy 13 of the HDPF which encourages main town centre uses within the defined areas of town and village centres which should be read in conjunction with Strategic Policy 12, which recognises the development hierarchy for the District, and sets a hierarchy for the district's town and village centre. It makes clear Horsham town is primary and Billingshurst is one of the secondary centres. These policies should also be read alongside and proposals should align with Strategic Policy 5 of the HDPF, which promotes the prosperity of Horsham town and seeks to maintain and strengthen its role as the primary economic and cultural centre in the District and seeks to retain and enhance its retail mix. Regard should also be given to Strategic Policy 6 which recognises the Broadbridge Heath Quadrant as a redevelopment opportunity area to complement other redevelopment in Horsham town to benefit the district and secure the vitality and vibrancy of Horsham town.

The proposal would also be contrary to Strategic Policies 35 and 36 of the Submitted Local Plan and fails to align with Strategic Policy 4 which promotes Horsham town as the main economic centre including retail as well as Policy 5 which promotes the Broadbridge Heath Quadrant as a strategically significant opportunity area to complement the primacy of Horsham town.

**ANY RECOMMENDED CONDITIONS:**

Refusal is recommended, however, if permission were to be granted it is important the building has the flexibility to deliver employment floorspace of the scale in demand. This includes small and start ups so sub-division to facilitate occupation by a number of different size businesses should be enabled, which should include the ability to sub-divide to provide units as small as at least 35sqm but potentially offering a range from 18sqm to 185sqm (see paragraph 9.19 in the Submitted Local Plan).

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| **NAME:** | Rebecca Fry |
| **DEPARTMENT:** | Planning Policy |
| **DATE:** | 22/01/2025 |