Horsham District Council
Planning Services
Parkside
Chart Way
Horsham
RH12 1RL

[redacted]
Gorings Mead
Horsham
RH13 5BS

2nd February 2024

Dear Sir/Madam,

PLANNING APPLICATIONS COMMENTS REF: DC/24/0048

Introduction

I write as a local resident of Gorings Mead. I am also a charted town planner with over thirteen years post qualification experience.

I have previously commented on planning application DC/22/2257. In that response I supported the principle of what the club was trying to achieve (i.e. providing additional sport and recreation facilities for the district). However, I also stated the development needs to be properly controlled so that it does not prejudice the amenity and safety of local residents.

I strongly object to the current planning application. I have set out the reasons for this below.

Description of Development

The description of development is as follows (emphasis added):

'Change of use of the main car park to regularise the use <u>of 50 spaces</u> as private parking to local businesses for weekdays, between the hours of 08.00am and 18.00pm. (This to exclude all weekends and Bank Holidays) No building work is required to the area which is covered by security cameras and has lighting.'

The application form refers to 120 spaces, and this number of spaces is also shown on the drawings. The red line boundary of the planning application comprises 120 spaces. The applicant is seeking permission for 50 of the spaces to be used on a commercial basis. This discrepancy should be clarified. Notwithstanding, I do not understand how the Council could seek to control the number of spaces being used. Any requirement on the applicant to do this would be unenforceable.

If permission is granted for the use of 50 spaces they could, in theory, be used by any local businesses. This would result in comings and goings at all times of day. It should also be noted that 50 spaces represents a substantial car park. To give some comparison of scale, the nearest car park in the town centre is located on Denne Road. This has capacity for 100 spaces. Clearly, this scale of car parking is not suited to a cul-de sac like Gorings Mead.

Amenity

Policy 33 of the Horsham Local Plan seeks to protect amenity. The usage of the site as a football club results in limited use throughout the week. However, the use of the site as a commercial car park cumulatively, with the sports use has resulted in detrimental amenity impacts for local residents. This is because the site is used at all times of day and night (i.e. people parking from 8am, and leaving at

5pm followed by use by the club). This detrimental impact on amenity is contrary to policy 33 and presents a clear reason to refuse the application.

Principle of Development and Justification for the Development

The case in favour of the development, put forward by the applicant, is as follows:

'On the East side of the Horsham Town there is a shortage of company employee parking and the club had been approached to help out'

It is factually incorrect to say that there is limited space for employee parking. There are a number of town centre car parks in Horsham. If the assertion is that these are over-capacity to the point where employees can no longer park in them, then the applicant should be required to justify this position through a car parking survey.

Policy 5 of the Horsham Local Plan provides clear direction that Horsham town centre (as defined on the proposals map) should be the focus for supporting local businesses and providing the necessary infrastructure to facilitate this (including car parking). The proposed development is contrary to this policy, and should be refused on this basis.

Transport

The most fundamental concern is that the Council has not been provided with sufficient information to properly assess the impact arising from the development. There is no transport report with the application. The addition of 50 commercial car parking spaces is substantial and is giving rise to a significant number of vehicular movements at peak periods. This needs to be properly considered including consultation with West Sussex County Council as highways authority.

Gorings Mead has a very narrow access on to Brighton Road. I am concerned that the proposed use has intensified this access. There have been accidents on the road and additional use of it could cause further road safety problems. Please see accident crash data appended to this letter.

Temporal Nature of the Application

The comments publicly provided by the applicant on application DC/22/2257 state (emphasis added):

'The parking on site is a <u>temporary measure</u> while we wait for a planning decision on the 3G pitch. We are simply utilising unused parking capacity to try and generate some income and stem the football club's financial losses. The income from car parking in the last financial year 2022-23 averaged £1,270 per month and this year it is running at ~£1,800 pcm. We were unaware that any additional permissions are required. If we receive planning permission for the 3G pitch we expect in future we will need to confine use of the car parking for the football club, 3G pitch hire customers and the long-standing club house community activities (i.e. NHS blood donors, slimming world, dancing, snooker and pigeon clubs).'

The current application is a permanent application (not temporary), as the applicant explained it would be. I note that application DC/22/2257 is yet to be determined. As per my previous comments, conditions on DC/22/2257 need to consider how the club will be used going forward for other activities that are not ancillary in nature.

Other material considerations

In the past the site has been used on a commercial basis without the necessary planning permissions. For example, *We Buy Any Car* operated from the site for a period of time and the Council explored the possibility of enforcement action (Ref: EN/21/0222).

With two breaches of the planning permission (*We Buy Any Car* and the current proposal), I am concerned that the applicant does not understand how the site should lawfully be used. The applicant has stated :

‘We were unaware that any additional permissions are required. If we receive planning permission for the 3G pitch we expect in future we will need to confine use of the car parking for the football club, 3G pitch hire customers and the long-standing club house community activities’

Conditions need to be attached which meet all the relevant tests. Most importantly the conditions need be clear to the applicant and be enforceable. This point applies to application DC/22/2257 too.

The cumulative use of the site for various different purposes (sports pitches, commercial car parking, etc.) will amount to something that resembles a *sui generis* use. This needs careful consideration to ensure that the development is properly controlled.

Conclusion

Thank you for the opportunity to comment on the planning application. I would be grateful if due consideration could please be given to these matters. I am very happy to discuss these comments.

Yours Sincerely

[redacted]

Gorings Mead – Accident Data

