

I Document	ouncil Local Plan 2023-2040 Statement obo Dudman Chantry (Industries) Limited

## 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?

We note that proposed Main Modification PM005 and PM006 put forward by the council seek to update the policies map to depict Chantry Lane Strategic Minerals Site Allocation Policy 11 in the West Sussex (WS) Joint Minerals Local Plan (July 2018). We would like to confirm that this would be both unnecessary and inconsistent. The Development Plan for the district is made up of a suite of documents, including the WS Joint Minerals Local Plan and as such amending the policies map would represent unnecessary duplication of policy. In addition, we consider it would be inconsistent to identify this site over all others which clearly would not be necessary. Any application would need to address the requirements of the Development Plan as a whole and policies should not be unnecessarily duplicated.

## Q1. 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?

The Local Plan is based on economic evidence which was prepared in 2020 and as such is reliant on evidence which does not take account of more recent changes in the industrial sector resulting from Covid and/or Brexit, or more recent trends in the Horsham market and is therefore considered to be out of date.

The economic growth forecasts are skewed by evidence of the early impacts of Covid and fails to take into account more recent evidence on completions and commitments in developing those forecasts. As a result, the conclusions of the EGA and Focused Update are considered to be unrealistically low/ overly pessimistic based on known recovery of the market since 2020.

The EGA and Focused Update identify forecasts of a lower level of future employment growth, in addition, more recent analysis shows that completions are higher than tested in the EGA Update. The result of which is a greater need, above that which is planned for and more in line with higher end of the range presented in the EGA, not the lower end which is what has been sought through the plan. This should also be considered in the context of the sites location close to the constrained costal authorities (namely Adur & Worthing and Brighton & Hove) who are unable to meet their own need for employment growth.

The age of existing stock in the district is also an issue in terms of suitability of supply. In respect of Chantry Industrial Estate, the site is in need of significant investment to meet modern standards and requirements through redevelopment which the landowner is willing to undertake, with the support of enabling residential development. As detailed in our Regulation 19 representation, the site can deliver approximately 70,000 square metres of high quality purpose built commercial employment space on existing brownfield land, enabled by the provision of approximately 125 dwellings whilst ensuring that the existing soft sand quarry remains viable. The site therefore offers an excellent opportunity for organic growth of this sustainable settlement with both residential and employment, the latter of which is not currently proposed in the plan at Storrington.

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?

## The total employment land supply is based on out of date evidence and is as a result are insufficient and will not be effective.

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?



The employment land requirements are supply are based on out of date evidence and will not therefore be effective. For example, the EGA Focused Update includes a table of committed sites (Table 3.1) at paragraph 3.3. of the study which amounts to 146,205m2 of employment floor space in the council's supply. However, none of this has been delivered in the district during the current plan's adoption (over 7 years). A significantly greater range of employment land must be identified by the Council to meet more urgent employment needs of existing and future businesses in the District which could be delivered at the Chantry Industrial Estate and Quarry site (SA:455).