



Project	Land East of A29, Brinsbury College, Pulborough
Document	Horsham District Council Local Plan 2023-2040 Matter 7 Hearing Statement – Chichester College Group Representation Number(s): 1193780

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?

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?***
- 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 National Planning Policy Framework (NPPF) seeks to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth. The NPPF requires effective and on-going joint working between local authorities in ensuring development needs are met.

The Reg 19 Draft Local Plan in Chapter 9 Economic Development recognises that, 'The Council's Economic Strategy and vision is to achieve long-term prosperity and resilience. This approach seeks to ensure that investment is complementary with the wider sub-regional economy within north west Sussex, and contributes to the wider economic health of the area as a whole'

It further states that, 'In seeking to secure increased business investment in the District, a further key aim of the economic strategy for this Plan is an aspiration to provide at least one 1 job per new home. This will be achieved through a range of means, including new employment development and expansion (E(g) and B class uses), retail, leisure and increased homeworking facilities.

In terms of delivery the Economic Land Report (2018) sets out a trajectory which categorises the availability of potential employment sites into 5-year blocks. Notably, 5 sites were listed in the first block (2018 to 2023) comprising some 20.82 ha of employment land. However, Year 5 expired in March 2023 and within the 5-year period, none of the 5 listed employment sites has been delivered. Furthermore, a further 10 sites were listed with the potential to deliver a further 24.44ha (from 6 to 10 years) but few have planning permission, some are subject to formal allocation through the local plan review process and therefore few have been delivered.

Including developable sites of 11 plus years the Report states that the total economic land capacity to be delivered through the plan period to 2031 is 89.91ha. As stated above, 5 years into the process very few sites have been delivered and there is little land that is either demonstrably deliverable or developable.

Notably, the Economic Land Report and July 2021 Reg 19 document included land at the Buck Barn strategic allocation although this has now been entirely removed in the latest Draft Local Plan

It has not been demonstrated that that the requirement for new industrial and commercial land has been fully accommodated within the proposed site allocations of the Draft Local Plan Review. It is considered that a more ambitious target for employment land opportunities would allow the Council to meet its regeneration and growth priorities but also align with the requirement to plan for higher levels of housing growth in the coming years.



ECE Planning

In addition, the Horsham industrial market also faces its own pressures with pent up demand resulting from a lack of supply. This is demonstrated through low levels of available stock, borne out through higher levels of rental growth. At the present time there is only one unit of greater than 50,000 sq. ft available (noting this has yet to be built out) within Horsham, and a limited selection of smaller units, most of which are located to the north of the District.

It is also clear that much of the existing industrial stock within the District is ageing, and no longer fit for modern business needs. A lack of available stock presents businesses looking to relocate to more suitable or larger premises (as they upscale) with issues, and the potential alternative of relocating further afield with the consequential loss of local jobs.

Proposed employment development at Brinsbury College would provide approximately 9ha. of employment floorspace for both commercial / industrial use. The site will provide a sustainable, high quality and much needed employment space that meets assessed employment needs required across Horsham District.

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

It is unclear as to whether proposal must meet some or all of the criteria in Strategic Policy 29: New Employment as the policy merely refers to achieving economic growth. Aside from supporting strategic allocations, the policy does not set a clear framework for accommodating and facilitating economic growth in the District. Taking into account the failure of the HDPF to bring forward previous allocated sites for development and the constraints to supply, the policy should facilitate employment development outside of settlement boundaries, albeit in sustainable locations.

Criterion 3 should be extended to support all Class E, B2 or B8 developments outside of town centre sites, rather than just light industrial and office.

In specific relation to Brinsbury College and the development of employment floorspace it is important that the ***Brinsbury Centre of Rural Excellence Supplementary Planning Document (February 2009)*** is retained as supplementary planning guidance within the Local Plan, with specific reference to the SPD in the supporting text to Policy 29 or as a specific policy criterion.