



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 7: Economic Development

Issue 1

Date: November 2024

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Issue 1: Whether the approach to employment land and supply is justified, effective, consistent with national policy and positively prepared?

Question 1: Is Strategic Policy 29: New Employment sound?

1. The policy is a strategic policy and Horsham District Council considers it to be soundly based, consistent with national policy, and appropriate in providing the conditions for businesses to invest, expand and adapt. The policy clearly identifies the various sources of supply. It clearly sets out the allocations on which new employment floorspace is expected to be delivered, and clearly identifies other sources of supply when read in conjunction with **Strategic Policy 30: Enhancing Existing Employment and Policy 31: Rural Economic Development** and **saved policies SD1 and SD2 of the Horsham District Planning Framework 2015 – 2031 (HDPF) (HDC05)** and **the West of Bewbush Joint Area Action Plan 2009**¹. In summary, the Council considers the policy to be:
 - **Positively Prepared:** the policy forms part of a strategy which, as a minimum, seeks to meet the area's objectively assessed employment needs, is informed by agreements with other authorities, and is consistent with achieving sustainable development. The allocations will assist with achieving requirements as identified in **paragraph 9.12 of the Plan (SD01)**, taking into account commitments and informed by **Economic Growth Assessments (EC01 and EC02)**. The policy positively and proactively encourages sustainable economic growth in accordance with **paragraphs 81 and 82 of the NPPF**.
 - **Justified:** the policy helps in the delivery of an appropriate strategy, taking into account the reasonable alternatives, and proportionate evidence. **Topic Paper 1: The Spatial Strategy (HDC02)** provides an overview of the development strategy of **the Plan (SD01)**. It is informed by **Economic Growth Assessments (EC01 and EC02)** and supported by the findings of the **Site Assessment Report (H11)** and the **Sustainability Appraisal (SD03)**. It takes into account the settlement hierarchy in **Strategic Policy 2 of the Plan (SD01)** and **Settlement Sustainability Review (EN07)**.
 - **Effective:** The policy, and its allocations and criteria, will ensure that proposals would come forward over the plan period having due regard to particular site circumstances and would thus assist in achieving sustainable development. **The Duty to Cooperate Statement (SD12)** and the **Council's response to Matter 1, Issue 1** provide an overview to the effective joint working on cross-boundary strategic matters that has been undertaken. Notwithstanding the relevance of all the Statements of Common Ground with other local authorities, the link between the three Northern West Sussex (NWS) local authorities is recognised in the **Northern West Sussex Statement of Common Ground, (July 2024) (DC01)** and respectively in the individual Statements of Common Ground with **Crawley (July 2024) (DC04)** and **Mid Sussex (August 2024) (DC17)**. The **Northern West Sussex Economic Growth Assessment (January 2020) (EC02)** was jointly commissioned by Horsham, Crawley and Mid Sussex local planning authorities to facilitate the consideration of cross boundary matters in accordance with **PPG (Ref ID: 3-007-20190722)**.
 - **Consistent with National Policy:** The policy will assist in achieving sustainable development and complies with objectives and policies within the **NPPF**, including **section 6** and also the paragraphs that seek a sequential approach to the provision of offices – such as **paragraphs 86 to 89**. It also takes into account the implications of Use Class E on the delivery of employment as well as the office to residential permitted development rights.

¹ <https://www.horsham.gov.uk/planning/planning-policy/west-of-bewbush-joint-area-action-plan>

2. The policy enables the Local Plan to apply a positive and proactive strategy in planning to meet Horsham District's employment land and floorspace needs for the plan period, whilst also having regard to sustainability and climate change in accordance with **paragraphs 8, 11, 16, 81-85 of the NPPF**. It seeks to ensure that Horsham District will continue to have a strong, resilient and diverse economy and for it to be a first choice business destination. Key to this is the policy support for the provision of office space within settlement centres with greater flexibility for Grade A office space, the allocation of approximately 17 hectares for additional employment land within this policy (Strategic Policy 29) and, when read with Strategic Policy 30, the protection of existing employment sites and premises for employment use. In addition to this, regard should be given to saved employment allocations in **Policies SD1 and SD2 of the HDPF (HDC05)**, which is included in Table 5 of **the Plan (SD01) and the West of Bewbush Joint Area Action Plan 2009²**, and the made **Henfield Neighbourhood Plan³** whereby just under an additional 23 hectares of land is allocated for employment – which are considered to form commitments in this response.
3. **Paragraph 2.34 of the Local Plan Review: Issues and Options – Employment, Tourism and Sustainable Rural Development (CD03)** set out the initial economic strategy. The approach has been informed by a proportionate, robust evidence base in accordance with **paragraphs 31, 35 and 122 of the NPPF and Planning Practice Guidance (PPG)** (particularly, Ref ID: 2a-025-20190220 to 2a-032-20190722 and 3-001-20190722 to 3-026-20190722), which takes account of economic forecasts, market intelligence, and the available land supply position to set in place a strategic policy approach that will enable Horsham District to build upon its economic strengths, counter its weaknesses, and address future challenges. Regard has also been given to local and national economic policy and guidance (including **HDC13**).
4. Key evidence is the **Northern West Sussex Economic Growth Assessment (January 2020) (EC02)** and its **Focused Update for Horsham (November 2020) (EC01)** that endorse the Northern West Sussex area as a Functional Economic Market Area (FEMA) and help establish Horsham's future employment needs in terms of job growth, business floorspace and land take.
5. The District Council has historically and continues to actively engage with other public bodies and surrounding authorities on strategic planning issues relevant to the area, including employment matters. There are inevitably cross-boundary employment issues, including, the employment needs generated by the population of the Strategic Site HA2 Land West of Ifield's urban extension to Crawley where around 2 hectares of employment floorspace forms part of this allocation. The **Crawley Borough Council Statement of Common Ground (DC04)** evidences that both Crawley Borough and Horsham District Councils agree that the approaches taken in the respective local plans are complementary, and ensure a variety of employment opportunities and flexibility of supply within the NWS FEMA and to support the Gatwick Diamond. Appropriate recognition has been given to the dominant commercial role of Crawley in the Northern West Sussex functional economic market area (FEMA), whilst ensuring Horsham continues to be attractive to business in a way that positively and proactively encourages sustainable economic growth.
6. The allocations in the policy have been informed by the **Site Assessment Report 2023 (H11)** and **Sustainability Appraisal (SD03 and SD04)**, which undertake an assessment of sites. They also take into account the **Habitats Regulations Assessment (SD07)** and the **Settlement Sustainability Review (EN07)**. The allocations in the policy lie throughout the District adjacent to the major road network and a settlement or urban extension consistent with achieving sustainable development.

[Q1.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?](#)

7. The overall employment land requirement (hectares and floorspace) over the plan period is 0ha/0sqm based on the objectively assessed needs presented in the **Northern West Sussex Economic Growth Assessment (January 2020) (EC02)**, including Table 3.2, and taking into account the

² <https://www.horsham.gov.uk/planning/planning-policy/west-of-bewbush-joint-area-action-plan>

³ https://www.horsham.gov.uk/_data/assets/pdf_file/0007/108466/Henfield-NDP-Referendum-Version-May-2021.pdf

housing target in the Plan (SD01). This is made clear in **Paragraph 9.12 of the Plan (SD01)** which also reflects the need prior to the inclusion of extant planning permissions for employment.

8. It should be noted however that paragraphs **9, 10.34 and 10.41** of the **Northern West Sussex Economic Growth Assessment (January 2020) (EC02)** highlights a potential imbalance, with pipeline supply (through planning permissions) weighted towards office uses, while the demand identified in some of the scenarios assessed is tilted more towards industrial uses. This could therefore lead to a slight shortfall in industrial floorspace if not addressed through intensification and/or site allocations. This is also reflected in paragraph 4.10 of the **Northern West Sussex Economic Growth Assessment (January 2020) (EC02)**. Key background evidence in respect of this is provided below.
9. **Paragraph 9.12 of the Plan (SD01)** sets out the overall employment land requirement taken from the **Northern West Sussex Economic Growth Assessment (January 2020) (EC02)**, which was jointly commissioned by Horsham, Crawley and Mid Sussex local planning authorities, and more pertinently its **Focused Update for Horsham (November 2020) (EC01)**. These documents test three different types of 'forecasting' scenarios which accord with **Planning Practice Guidance (PPG): Housing and Economic Needs Assessment (16 December 2020 Update. Ref ID: 2a-027-20190220)**. The first scenario is baseline job growth based on economic forecasts from Oxford Economics, which is a recognised and reputable independent global economic advisory firm. The second scenario analyses the past take-up of employment land and property and, with some consideration of how they may change, projects these forward. The third is based on labour supply and considers population growth in relation to housing provision (in addition to the baseline standard housing method figure two higher labour supply figures were tested which are currently considered unrealistic due to the impacts of water neutrality).
10. This work was undertaken by Nathaniel Lichfield & Partners LTD (Lichfields) who are an internationally recognised and reputable consultancy with extensive expertise in producing such assessments. The documents provide a robust proportionate overarching review of the employment needs and supply in both the Northern West Sussex area and the District of Horsham.
11. **Paragraph 9.12 of the Plan (SD01)** makes clear that based on the three main different baseline scenarios tested, if no regard were given to commitments (uncompleted planning permissions), the land requirement (hectares and floorspace) ranges between negligible (0ha) / 13,300sqm to 45.1ha / 179,240sqm. It also makes clear that there would be no unmet requirement if the majority of the commitments are delivered. It is considered this is appropriately specified in **the Plan (SD01)**. The Economic Growth Assessment process is more a tool to guide planning, and the data should not be applied rigidly particularly that taken from on a snapshot in time. This equally is the reasoning for why the evidence provided, which looked at a period between 2019 – 2037, is considered to provide sufficiently robust and proportionate evidence for the Plan (SD01) plan period of 2023-2040 especially when regard is given to the following.
12. The **Northern West Sussex Economic Growth Assessment (January 2020) (EC02)** considers the functional economic market area (FEMA) in accordance with **Planning Practice Guidance (PPG): Housing and Economic Needs Assessment (16 December 2020 Update. Ref ID: 2a-025-20190220 and 2a-026-20190220)**. The **Executive Summary, bullet 1 and Chapter 2 of the EC02** finds that the Northern West Sussex (NWS) area continues to operate as a broad FEMA with the spatial extent largely consistent with the authority boundaries of Crawley, Horsham and Mid Sussex. It notes there are economic linkages with adjoining areas such as Coastal West Sussex, Reigate and Banstead (e.g. Horley) and East Sussex but these are weaker and the influence is mainly from a retail catchment perspective (**para 2.33 of EC02**).
13. The **Focused Update for Horsham (November 2020) (EC01)** factors in the effect of political and societal change related to the response to Covid-19, including updated data from Oxford Economics, as well as a revised period from 2019-2036 to 2019-2037.

14. The evidence set out in **Northern West Sussex Economic Growth Assessment (January 2020) (EC02)** (and its focused updates for Crawley) and the engagement of authorities on employment land matters was endorsed by the **Crawley Local Plan Inspectors' Report (HDC07)** earlier this year (paragraphs 16 to 18, 116, 117). In addition to this, the evidence set out in both **EC01** and **EC02** has already been subject to scrutiny and effectively endorsed and considered to be robust by a Planning Inspector in his report dated 14 February 2023⁴, that considered a planning Appeal for 'Phase 3' at Hilland Farm, Billingshurst (**site reference SA573 in the Site Assessment Report (H11 Part E)**). The Inspector also considered the Council's detailed calculations for the small sites and methodology to be robust and consistent.
15. **Table 1** below sets out the findings from the **Focused Update for Horsham (November 2020) (EC01)**. As noted above, in addition to the baseline standard housing method figure two higher labour supply figures were tested, which are currently considered unrealistic due to the impacts of water neutrality. They are therefore not presented here.

Table 1: Indicative Gross Land and Floorspace Requirements by Scenario 2019 to 2037 (ha / sqm) (October 2020 Commitments) (Source: (EC01) Tables 2.5, 2.6, 2.8, 2.9, 2.10, 3.1 and 3.2):

Use, Available Space, Surplus / Shortfall	1. Baseline Job Growth (Informed by Oxford Economic Q3 2020 forecasts) (Scenario 1)	2. Past Development Rates (Scenario 2)	3. Baseline Labour Supply – Standard Method (Scenario 3)
Office (B1a / B1b)	3.7ha (28,130sqm)	-0.3ha (-2,520sqm)	4.7ha (35,776sqm)
Manufacturing (B1c / B2)	-5.2ha (-20,970sqm)	38.5ha (154,040sqm)	14.3ha (57,366sqm)
Distribution (B8)	1.5ha (6,140sqm)		18.5ha (73,849sqm)
Mixed B	n/a	6.9ha (27,720sqm)	n/a
All B Uses (Identified employment need prior to inclusion of Commitments)	0ha (13,300sqm)	45.1 (179,240sqm)	37.5ha (166,990sqm)
Available Employment Space (Employment Supply based on commitments as at Oct 2020)	All B Uses = 215,296sqm (split as follows: 82,367sqm Office [B1a]; 6,622sqm Light Ind [B1c]; 29,549sqm Gen Ind [B2]; 29,751sqm [B8]; 67,007sqm Mixed B)		
Surplus (+) / Shortfall (-)	+201,996sqm	+36,056sqm	+48,306sqm
Employment Requirement (After inclusion of Commitments)	0ha (0sqm)	0ha (0sqm)	0ha (0sqm)

16. The commitments applied by Lichfields in document **EC02** and **EC01** were based on **Commercial, Industrial and Leisure Land Availability (CILLA)**⁵ monitoring provided by West Sussex County Council, with some account given to larger sites subsequently approved. The approach taken to the

⁴https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=C6599F38491845359D6CBEDD9635BD58

⁵ <https://www.westsussex.gov.uk/about-the-council/information-and-data/data-store/commercial-and-residential-data/>

CILLA monitoring of commitments is robust and follows a tried and tested approach capturing, monitoring and reporting upon commercial floorspace completions and commitments. The **CILLA** data is subject to review and agreement by the District Council and it is used to inform the District Council's Authority Monitoring Report which is published annually. This data provides 'snapshot in time' robust proportionate evidence of future delivery based on planning permissions. In practice, the situation is ever changing as sites get built out, permissions lapse and new ones are granted.

17. The **Focused Update for Horsham (November 2020) (EC01)** does not provide figures in hectares when discussing land requirements once commitments have been taken into account. This is because there is no straightforward way to do this given many relate to the intensification of existing employment land or include extensive tracks of land for access, which wouldn't necessarily lead to an increase in employment land.
18. However, to help provide an indicative land requirement, assumptions can be made based on the different plot ratios for 'Office (B1a/B1b)' and 'Industrial (B1c/B2/B8)' set out in **paragraph 2.35** of the **Focused Update for Horsham (November 2020) (EC01)**(and **paragraph 8.57 of EC02**). **Table 2** below provides the data with hectareage when the plot ratio assumptions are applied to the office requirements once the office commitments have been taken into account and similarly for industrial for each of the scenarios. Two calculations are provided for 'office' and also for 'industrial' in Scenario 2 because it depends on whether 'Mixed B' is included as 'office' or 'manufacturing/distribution'.

Table 2: Indicative Gross Land and Floorspace Requirements by Scenario 2019 to 2037 (ha / sqm) (October 2020 Commitments) [Source: (EC01) Tables 2.5, 2.6, 2.8, 2.9, 2.10, 3.1 and 3.2]:

Use, Available Space, Surplus / Shortfall	1. Baseline Job Growth (Informed by Oxford Economic Q3 2020 forecasts) (Scenario 1)	2. Past Development Rates (Scenario 2)	3. Baseline Labour Supply – Standard Method (Scenario 3)
Office (B1a / B1b)	3.7ha (28,130sqm)	-0.3ha (-2,520sqm)	4.7ha (35,776sqm)
Manufacturing (B1c / B2)	-5.2ha (-20,970sqm)	38.5ha (154,040sqm)	14.3ha (57,366sqm)
Distribution (B8)	1.5ha (6,140sqm)		18.5ha (73,849sqm)
Mixed B	n/a	6.9ha (27,720sqm)	n/a
All B Uses <i>(Identified employment demand prior to inclusion of Commitments)</i>	0ha (13,300sqm)	45.1 (179,240sqm)	37.5ha (166,990sqm)
Available Employment Space <i>(Employment Supply based on commitments as at Oct 2020)</i>	All B Uses = 215,296sqm (split as follows: 82,367sqm Office [B1a]; 6,622sqm Light Ind [B1c]; 29,549sqm Gen Ind [B2]; 29,751sqm [B8]; 67,007sqm Mixed B)		
Office Surplus (+) / Shortfall (-) (Applying para 2.35 of EC01 plot ratios)	Office: +54,237sqm (c.+7ha)	Office (excl mixed B): +84,887sqm (c.+11ha) OR Office (incl mixed B): +57,167sqm (c.7.4ha)	Office: +46,491sqm (c.+6ha)

Use, Available Space, Surplus / Shortfall	1. Baseline Job Growth (Informed by Oxford Economic Q3 2020 forecasts) (Scenario 1)	2. Past Development Rates (Scenario 2)	3. Baseline Labour Supply – Standard Method (Scenario 3)
Industrial Surplus (+) / Shortfall (-) (Applying para 2.35 of EC01 plot ratios)	Industrial: + 147,759sqm (c.+37ha)	Industrial (incl mixed B): -33,536sqm (c.-8.4ha) OR Industrial (excl mixed B) -21,111sqm (c.-5.3ha)	Industrial: +1,714sqm (c.+0.4ha)
Total Surplus (+) / Shortfall (-) (Applying para 2.35 of EC01 plot ratios)	Total: +201,996sqm (c.+44ha)	Total If mixed B included as Industrial: +51,351sqm (c.+2.6ha) OR If mixed B included as Office: +36,056sqm (c.+2.1ha)	Total: +48,205sqm (c.+6.4ha)
Employment Requirement (After inclusion of Commitments)	0ha (0sqm)	0ha (0sqm) (Although relative balance of office and industrial uses to be considered)	0ha (0sqm)

19. **Table 2** shows that when office and industrial are considered together the ‘overall’ employment land requirement in hectares would be met after commitments have been taken into account. Scenario 2: Past Development Rates raises a potential issue with regard to industrial requirements not being fully met by commitments. Scenario 2 also reflects that there is an increasing move towards flexible proposals which can move between B2, B8 and E(g) uses and enables sites and premises to meet the varying market demands over the plan period.
20. It is acknowledged the background evidence covered 2019 – 2037 and did not specifically cover the Plan period of 2023-2040. The evidence is considered to remain proportionate given it is not possible to robustly forecast needs beyond 10 years. The evidence provided by the Economic Growth Assessments (**EC01** and **EC02**) is therefore considered to be robust and proportionate in accordance with **PPG (Ref ID: 2a-025-20190220 to 2a-030-20190220)**. The Council is in any event required to undertake five yearly reviews of a Local Plan. Notwithstanding this the Council is able to supplement the EGA in respect of the latest data for completions and commitments.
21. **Table 3** below provides the annual net employment floorspace completions between 1 April 2019 to 31 March 2024. **Appendix 2** provides the employment trajectory including information on the commitments as April 2024. One commitment, Broadlands Business Campus, has not been included because whilst the permission is still extant the land has since been developed as a solar farm.

Table 3: Net Employment Floorspace m² between 1 April 2019 to 31 March 2024 (source: Authority Monitoring Reports. NB AMR 2023/24 figures are provisional)

Use / Total	2019/20	2020/21	2021/22	2022/23	2023/24	TOTAL
B1a/Eg(i) (Office)	481	258	1,104	348	1,194	3,385
B1c/Eg(iii) (Industrial processes)	5,099	360	931	743	4,898	12,031
B2	5,173	3,745	570	-	620	10,108
B8	12,439	7,701	2,897	3,929	3,414	30,380
Mixed B1 / Mixed B	1,181	5,970	-468	2,322	1,878	10,883
TOTAL	24,373	18,034	5,034	7,342	12,004	66,787

22. The data provided in **Table 3** and **Appendix 2** has been presented in Table 4 to show a more up to date picture of the current situation between needs and supply. This provides the **updated residual employment land requirement**. It takes account of completions since 1st April 2019 to 31st March 2024, and an updated snapshot of commitments as at April 2024. Water neutrality impacts the labour supply scenarios, as these are based on future housing provision, and given that the Plan (SD01) is not meeting the standard method housing figure the resultant employment needs would be less than that shown in Scenario 3 (labour supply).

Table 4: Indicative Gross Land and Floorspace Requirements by Scenario 2019 to 2037 (ha / sqm) (NB AMR 2023/24 figures are provisional)

Use, Available Space, Surplus / Shortfall	1. Baseline Job Growth (Informed by Oxford Economic Q3 2020 forecasts) (Scenario 1)	2. Past Development Rates (Scenario 2)	3. Baseline Labour Supply – Standard Method (Scenario 3)
Office (B1a / B1b)	3.7ha (28,130sqm)	-0.3ha (-2,520sqm)	4.7ha (35,776sqm)
Manufacturing (B1c / B2)	-5.2ha (-20,970sqm)	38.5ha (154,040sqm)	14.3ha (57,366sqm)
Distribution (B8)	1.5ha (6,140sqm)		18.5ha (73,849sqm)
Mixed B	n/a	6.9ha (27,720sqm)	n/a
All B Uses (Identified employment demand prior to inclusion of Commitments)	0ha (13,300sqm)	45.1 (179,240sqm)	37.5ha (166,990sqm)
Completions – Apr 2019-Mar2024 (Table 3)	All B Uses = 66,787sqm (net) (split as follows: 3,385sqm Office [B1a]; 12,031sqm Light Ind [B1c]; 10,108sqm Gen Ind [B2]; 30,380sqm [B8]; 10,883sqm Mixed B)		
Available Employment Space (commitments as at April 2024)	All B Uses = 167,224sqm / 57.1ha (split as follows: 72,507sqm/21.1ha Office [B1a]; 3,592sqm/1ha Light Ind [B1c]; 3,534sqm/3.25ha Gen Ind [B2]; 15,664sqm/8.75ha [B8]; 71,926sqm/23.1ha Mixed B)		
Completions and Commitments (from Apr 2019)	All B Uses = 234,011sqm (net) / 57.1ha+		

Use, Available Space, Surplus / Shortfall	1. Baseline Job Growth (Informed by Oxford Economic Q3 2020 forecasts) (Scenario 1)	2. Past Development Rates (Scenario 2)	3. Baseline Labour Supply – Standard Method (Scenario 3)
(Employment Supply already in the pipeline. Appendix 2)	(split as follows: 75,892sqm Office [B1a]; 15,623sqm Light Ind [B1c]; 13,642sqm Gen Ind [B2]; 46,044sqm [B8]; 82,809sqm Mixed B)		
Surplus (+) / Shortfall (-)	+220,711sqm Surplus comprising: Office: +47,762sqm, Manufacturing +50,235sqm, Distribution +39,904sqm Additional mixed B of +82,809sqm)	+54,771sqm Comprising: office +78,412sqm, shortfall in manufacturing & distribution of -78,731sqm or when considered with mixed B this equates to -23,642sqm)	+67,021sqm Comprising: office +40,116sqm, manufacturing -28,101sqm Distribution -27,805sqm however this could be addressed by mixed B which would result in a surplus of +26,903sqm)
Employment Requirement (After inclusion of completions and commitments)	0ha (0sqm)	0ha (0sqm) (Although relative balance of office and industrial uses to be considered)	0ha (0sqm)

23. The paragraphs above provide a step-by-step analysis which takes forward the EGA and EGA update (**EC02** and **EC01**) to ensure that the examination is party to up-to-date evidence. It is considered that the tables above provide robust proportionate evidence on the employment land requirement. The EGA studies and subsequent updates have informed the plan's development strategy, taking into account reasonable alternatives and based on proportionate evidence in accordance with PPG guidance (**Ref ID: 2a-025-20190220 to 2a-030-20190220**).
24. **Paragraph 9.17 of the Plan (SD01)** sets out that the identified need for employment floorspace in **EC01 and EC02** should be applied as a 'floor' and not used to limit further growth (which would conflict with **NPPF paragraphs 81 and 82**). The employment land requirement set out in **paragraph 9.12 of the Plan (SD01)** is considered to be justified and effective.

Q1.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?

25. The overall employment land supply (hectares and floorspace) is assessed to be slightly in excess of 74.1 hectares (285,211sqm) when account is given to 2019-2024 completions (Table 3), commitments (Appendix 2) and Strategic Policy 29 allocations. This is summarised in Table 5 below. For the plan period of 2023 to 2040 this equates to 74.1 hectares+ (230,428sqm).

Table 5: Horsham District: Employment land supply:

Supply	Hectares	Floorspace
Completions 2019 – 2023	Completion 'hectares' not included as several are intensification not new land	54,783sqm
Completions 2023 – 2024		12,004sqm

Commitments (as at April 2024)	57.1ha	167,224sqm
SP29 Allocations	17ha	51,200sqm
Total Supply	74.1ha+	285,211sqm

26. As the total employment land supply takes into account commitments which are a snapshot in time, it is not considered appropriate to specify information other than the large commitments as set out in Table 5 of the **Plan (SD01)**, which are consequently protected by **Strategic Policy 30**.
27. **Paragraph 82 of the NPPF** makes clear that planning policies relating to the building of a strong, competitive economy need to be flexible enough to accommodate needs not anticipated in the plan and allow for changes in working practices and economic circumstances. The West Sussex County Commercial, Industrial and Leisure Land Availability (CILLA) data supported by Horsham District Council monitoring provides information on completions and commitments. The Authority Monitoring Report, published annually and informed by the CILLA, monitors the delivery of employment. It is considered to be more appropriate to refer to than a 'snapshot-in-time' information in the Local Plan that will become dated.
28. For the above reasons and those presented in response to Question 1.c below, the employment land supply (hectares and floorspace) over the plan period, shown in **Appendix 2** and supplemented by the completions set out in **Table 3** above, is considered to be justified and effective.

[Q1.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?](#)

29. The overall employment land requirements and supply are summarised in Table 6.

Table 6: Horsham District: Employment land requirements and supply:

	Hectares	Floorspace
Overarching Identified Need/Requirement (2019-2037)	0ha – 45.1ha	13,300sq – 179,240sqm
Supply / Completions: 2019 – 2024	<i>Completion 'hectares' not included as several are intensification not new land</i>	66,787sqm
Need (2024-2037) (excluding 2019-2024 completions)	0ha to 45.1ha	0 sqm to 105,804sqm
Supply / Commitments and SP29 allocations: 2024- 2037/40	74.1ha	218,424sqm
Total Supply (2019 – 2037/40)	74.1ha	285,211sqm

30. It is recognised that the employment evidence for the District indicates the Local Plan does not theoretically have to allocate any additional employment land when commitments are taken into account. However, **the Plan (SD01)** has been positively prepared providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs for employment in accordance with **paragraphs 11, 16, 81 and 82 of the NPPF**. It reflects the potential imbalance between the demand and supply for office and industrial uses respectively, which could result in a slight imbalance leading to a potential need of between 23,642sqm to 78,731sqm in manufacturing and distribution uses (as set out in Table 4 above). It therefore includes allocations that would deliver employment land in excess of the assessed overall need in a way that could help address any residual need for manufacturing and distribution uses, and also balances sustainability issues and complements neighbouring authorities approaches, taking into account proportionate evidence. The approach is also in accordance with the Council's corporate approach to economic development which aims to

nurture business development, create and curate sustainable quality places, attract investment, and enhance the skill base.

31. The approach is considered to be justified because it has been informed by robust and proportionate **Economic Growth Assessments (EC01 and EC02)** which find that commitments and needs are relatively in balance but acknowledge a slight potential unaddressed need for manufacturing and distribution uses. The commitments included in analysis are based on robust monitoring by both West Sussex County Council and Horsham District Council, which is updated annually through the AMR (as set out in the response to questions 1a and b above). **Paragraphs 9.15 to 9.17 of the Plan (SD01)** set out reasons as to why the findings of the **Economic Growth Assessments (EC01 and EC02)** should be considered to set a floor and should not limit further growth.
32. The identification of the employment land requirements and the supply has also been informed by feedback on the **Issues and Options document (CD03)** and the **Regulation 18 Local Plan (CD01 and CD02)**, as summarised in **SD11a and SD11b**, as well as outcomes from the **Site Assessment Report (H11)** and the **Sustainability Appraisal (SD03)** which takes into account the reasonable site alternatives.
33. **The Plan (SD01)** therefore allocates 7 employment sites in total spread throughout the planning District thereby providing choice and flexibility which are important considerations for supply. Of the 17 hectares allocated in the policy, around a third (c.6.5ha) lies within the three strategic allocations facilitating the formation of sustainable communities. The other two thirds (c.10.5ha) will enable the expansion and continued success of three existing thriving and / or managed employment estates or make efficient use of land constrained by roads, all are adjacent the major road network and a settlement/urban extension. The choice of sites, which relate to either existing employment sites or as part of a strategic development, ensures good prospect of realisation given expansion opportunities and certainty of supporting infrastructure. (Please also see the Council's response to Question 1.e below and Matter 9, Issue 1, particularly Question 6, 9-11).
34. The commitments and allocations are all considered to be deliverable over the plan period, they are all actively promoted. As evidenced by the jointly commissioned **Northern West Sussex Economic Growth Assessment (EC02)** the approach taken to commitments is a cross-boundary approach based on West Sussex County Council CILLA data. The employment allocation within the strategic site Land West of Ifield has been considered jointly with Crawley Borough Council taking into account it will deliver a new neighbourhood on the edge of Ifield/Crawley.
35. The Council considers the evidence to be robust and proportionate. It appropriately demonstrates the employment supply will be delivered within the plan period, accepting some flexibility, and that the employment requirement will be more than met, which will help address the issues raised in **paragraphs 9.15 to 9.17 of the Plan (SD01)** and may also offer the opportunity to make a positive contribution to the sustainable economic development of the wider sub-region.

[Q1.d\) Is it clear whether proposals must meet all criterion 1-10? Is the detailed wording of each of these criteria effective?](#)

36. The policy sets a positive approach to the development of employment. All the criteria are to be considered by virtue of the inclusion of "and" at the end of the penultimate criterion. However, the last sentence of the opening paragraph makes clear that only certain criteria will be relevant depending on the nature of the proposal.
37. Criterion 1 of the policy applies to the allocations identified in Table 6. These all seek the delivery of relatively large amounts of employment land where it is considered appropriate to ensure the meeting of needs is optimised.
38. The criterion will help deliver flexible space to help achieve sustainable development and meet the needs reflected in the supporting text and identified in the **Northern West Sussex Economic Growth**

Assessment (EC02) which has been summarised in a table set out in **Appendix 1**. It helps to ensure the needs of all businesses, including micro and start ups, are appropriately addressed.

39. Criterion 2 of the policy makes clear the provision of office development within **settlement centres as defined on the Policies Map (SD02)** will be supported and seeks to positively encourage the provision of additional office space within settlement centres.
40. Criterion 3 of the policy makes clear that, where a town centre site is not available, Grade A office will be supported subject to it being in a sustainable location which accords with **paragraph 88 of the NPPF**. It also reflects **paragraphs 86 and 87 of the NPPF** and their sequential approach to main town centre uses which are covered in the E Use Class. However, criterion 3 does not unduly restrict the former B1 uses now covered by use class E(g) which may also be commonly found within industrial estates where other 'town centre uses' may not be appropriate and/or could compromise B2 operations. The policy restriction to class E(g) is considered to be reasonable and takes into account the rural nature of the District where village centres are critical to the vitality of the settlement which could be significantly undermined by town centre uses being provided out of centre. The approach is also considered to accord with **paragraph 89 of the NPPF** which specifically excludes small scale rural offices from the sequential approach.
41. Criterion 4 of the policy reflects the findings of the **Economic Growth Assessments (EC01 and EC02)** as addressed above and depicted in **Appendix 1** and supports proposals for small start-up businesses and home-based businesses and makes clear regard should be given to this within strategic scale housing development.
42. Criterion 5 to 10 are positively worded and make clear support will be given for respective proposals in line with the Plan's objectives. The wording of all the criteria are considered to be effective.
43. The site allocations are addressed in detailed in Q1.e below or, in respect of the strategic allocations which seek to deliver sustainable communities, in the **Council's response to Matter 9, Issue 1**.

[Q1.e\) Are allocations EM1-EM4 soundly based, with particular regard to the mix of uses and constraints identified?](#)

44. For an overarching summary of why the Council considers the policy and its allocations to be sound please see the summary provided above in response to Question 1 relating to the soundness of the Policy, the Council's response to Question 1.b, 1.c and 1.d above is also relevant.
45. Horsham District Council considers the allocations **EM1-EM4** to be soundly based and consistent with national policy. **Paragraphs 10 and 11 of the NPPF** set a presumption in favour of sustainable development. A key focus is therefore the delivery of sustainable communities and their access to employment, this has informed the three employment allocations within the strategic allocations. It has also informed the other four allocations which are located on the edge of a settlement/urban extension and adjacent the major road network.
46. The allocations have not given rise to concern from surrounding authorities and have been welcomed by some. For example, Brighton and Hove City Council recognise the approach will help ensure that rates of commuting outside the District are not exacerbated, and that the allocations allow for choice and flexibility as well as offering an opportunity to make a positive contribution to the sustainable economic development of the wider sub-region (**Brighton & Hove Statement of Common Ground [DC07]** and their Regulation 19 Representation [#1193347⁶]).

6

https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1193347&nextURL=%2FRegulation%5F19%5FLocal%5FPlan%2FquestionnaireVotes%3Fqid%3D9331459%26status%3Dcomplete%26sort%3Drespondent%5F%5FcommonName%26dir%3Dasc%26showNum%3D10%26startRow%3D1%26search%3DBrighton%2520%2526%2520Hove

47. The four allocation sites have been actively promoted and are spread in four different locations across the rural District of Horsham. The sites have been assessed through the Council's site assessment process (**H11 part E**). They all lie adjacent the major road network as well as a settlement, or urban extension, of a medium village or larger size as defined in **Strategic Policy 2 of the Plan (SD01)**. Three are extensions to thriving and / or managed employment estates and one seeks efficient use of a site constrained by roads.
48. The **Northern West Sussex Economic Growth Assessment, January 2020 (EC02)** (paragraphs **9.15, 9.21 and 9.22**) noted the important role that existing employment sites in the District play in accommodating economic development activity. The allocations therefore help to re-enforce three existing thriving employment estates. **Paragraphs 8, 10.40 to 10.42** of **EC02** notes that the quantitative balance between identified future employment development needs and pipeline supply is relatively even in Horsham District although they also note the analysis does point to a likely shortfall in industrial space. It raises this could be addressed through intensification of existing employment sites and/or providing additional land through site allocations. The allocations will help address this potential industrial/distribution need.
49. **Paragraphs 4.14 to 4.17** of the **Northern West Sussex Economic Growth Assessment Focused Update for Horsham (November 2020) (EC01)** covers the implications of the changes to the Use Classes Order in force from 1st September 2020 which merged the former B1 Use Class with A2, A3, and parts of A1, D1, and D2 to form a new E Use Class.
50. The mix of uses allocated within these four sites have therefore been informed by the needs identified within the **Economic Growth Assessments (EC01 and EC02)**. It also considers changes over time to the Use Classes. It has regard to the **NPPF's sequential approach to offices** which it considers form a main town centre use, and takes into account office to residential permitted development rights, as well as considering the nature of the existing sites which will in effect be expanded by three of the allocations. Based on this and given that the allocations lie on the edge of settlements, the Council considers that the policy should specify a mix of uses to ensure it addresses demand for employment, as defined in paragraph 9.18 of the **Plan (SD01)**, and to resist any inappropriate formation of out of retail centres which could have significant implications for the respective village/town centres.
51. It should be noted that the **Pulborough Neighbourhood Plan**⁷ which is due to go to referendum in January 2025, also includes an employment allocation for the EM3 site. The Neighbourhood Plan covers the same uses but does not restrict its reference to Use Class E. The site does not lie within the village centre, it lies on the edge of the village settlement. Notwithstanding the Neighbourhood Plan, Horsham District Council considers it to be appropriate to restrict such uses to Use Class E(g) for the reasons detailed in the **Horsham District Council's response to Question 1.d** above in respect of town centre uses, and for reasons of consistency.
52. The constraints identified are key constraints that impact development footprint and layout, and may give rise to unforeseen circumstances, so their inclusion in the policy is considered to be appropriate in order to provide clarity that these are to be taken into account as part of the allocation.
53. In respect of Ancient Woodland, it is recognised that in their representation (#1192481)⁸, the Woodland Trust advocate a precautionary minimum buffer of 50m unless an applicant can demonstrate that a smaller buffer would suffice. They recognise 15m is the statutory minimum, not the optimum, a larger buffer may therefore be required in some cases. The updated Natural England and the Forestry Commission joint standing advice on Ancient Woodland, Ancient and Veteran,

⁷ https://www.horsham.gov.uk/_data/assets/pdf_file/0005/141467/Pulborough-Neighbourhood-Plan-Referendum-November.pdf

⁸ https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1192481&nextURL=%2FRegulation%5F19%5FLocal%5FPlan%2FquestionnaireVotes%3Fqid%3D9331459%26status%3Dcomplete%26sort%3Drespondent%5F%5FcommonName%26dir%3Dasc%26showNum%3D10%26startRow%3D11%26search%3DWoodland%2520Trust

published in January 2022 on GOV.UK⁹, makes clear buffer zones should vary depending on different factors and that as a minimum they should be at least 15 metres from the boundary of an ancient woodland. It is considered the relevant allocations should, and do, appropriately reflect the statutory requirements and standing advice.

54. The constraints reflect a number of matters requested by statutory consultees. Natural England raised a need for sites EM3 and EM4 to have regard to the “*potential impacts from surface water and waste water on the Upper Arun SSSI ... together with the scope for mitigation*” in their representations to the **Draft Horsham District Local Plan 2019-2036 (Regulation 18), February 2020 (CD01)**. Similarly, within West Sussex County Council’s representation to **CD01**, a need was raised for respective local plan allocations to reference relevant minerals and waste sites, infrastructure, safeguarding or consultation areas. **Policy W2 of the West Sussex Waste Local Plan** relates to ‘*Safeguarding Waste Management Sites and Infrastructure*’ and has been referenced because site EM2 lies near the Brookhurst Wood Landfill site. This could have implications for the development of EM2 such as environmental, amenity, highway etc. A modification is suggested (**SM30 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) to correct the reference to this policy and document).
55. Site EM2 lies adjacent to Partridge Green Wastewater Treatment Works it is considered appropriate to ensure any development does not undermine these Works.

Q1.f) Is the geographical application of this policy clear?

56. Horsham District Council considers the geographical application of this policy to be clear. It is a strategic policy and, unless stated otherwise, it applies to the whole of the Local Plan area and read in conjunction with other relevant policies. **Paragraph 1.6 of the Plan (SD01)** is clear that all policies within the Plan (SD01) relate to each other, and that the document should be read as a whole.

Question 2: Is Strategic Policy 30: Enhancing Existing Employment sound?

57. The Council considers the policy to be:
- **Positively Prepared:** the policy forms part of a strategy which, as a minimum, seeks to meet the area’s objectively assessment employment needs, and is informed by agreements with other authorities, and is consistent with achieving sustainable development. The policy positively and proactively encourages sustainable economic growth in accordance with **paragraphs 81 and 82 of the NPPF**.
 - **Justified:** the policy helps in the delivery of an appropriate strategy, taking into account the reasonable alternatives, and proportionate evidence. **Topic Paper 1: The Spatial Strategy (HDC02)** provides an overview of the development strategy of **the Plan (SD01)**. It is informed by **Economic Growth Assessments (EC01 and EC02)** and supported by the findings of the **Sustainability Appraisal (SD03)**. The consideration of the Key Employment Areas took into account the settlement hierarchy in **Strategic Policy 2 of the Plan (SD01)** and **Settlement Sustainability Review (EN07)**.
 - **Effective:** The policy is deliverable over the plan period. It will ensure that proposals would come forward over the plan period having due regard to particular requirements to help protect sufficient employment land for the increasing population, and would thus assist in achieving sustainable development.
 - **Consistent with National Policy:** The policy will assist in achieving sustainable development and complies with objectives and policies within the NPPF, such as Section 6. It also takes into account the implications of Use Class E on the delivery of employment as well as the office to residential permitted development rights.

⁹ <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

58. The **Northern West Sussex Economic Growth Assessment, (EC02)** noted 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 showed that continued protection of these sites is needed to ensure economic growth is not undermined by a lack of sites and premises. The policy clearly sets out which sites are considered to be Key Employment Areas, and the boundaries are shown on the **Policies Map (SD02)**. These sites are safeguarded for employment over the life of the Plan (SD01) and other existing employment sites are also protected in principle, in recognition of the pressure from higher land value uses, in order to help ensure there is sufficient stock and employment land for the increasing population and help in the retention and creation of sustainable communities. This also reflect that businesses normally require certainty in order to invest. Regard has also been given to vacancy rates as set out in **Appendix 3**.
59. The policy enables the Local Plan to apply a positive and proactive strategy to meet Horsham District’s employment land and floorspace needs for the plan period, whilst also having regard to sustainability and climate change in accordance with **paragraphs 8, 11, 16, 81-85 of the NPPF**. It seeks to ensure that Horsham District will continue to have a strong, resilient and diverse economy and for it to be a first choice business destination. Key to this is the policy support for the safeguarding of Key Employment Areas.
60. The approach has been informed by a proportionate, robust evidence base in accordance with **paragraphs 31, 35 and 122 of the NPPF and Planning Practice Guidance**, to set in place a strategic policy approach that will enable Horsham District to build upon its economic strengths, counter its weaknesses, and address future challenges.

[Q2.a\) The Policies Map identifies “Key Employment Areas” and “Sites for Employment” and the policy also refers to “Other Existing Employment Sites” Is it clear which type of sites each criterion is applicable to?](#)

61. Horsham District Council considers the policy covers the different employment sites appropriately. Strategic Policy 30 relates to existing employment. Criteria 1 and 2 are generic to all existing employment premises and sites, both those within Key Employment Areas as well as other existing employment sites.
62. Criteria 3 and 4 relate to the Key Employment Areas which have been clearly designated in Table 7 within the policy and depicted on the Policies Map (SD02).
63. Criteria 5 to 7 relate to all other existing employment sites which are not depicted on the Policies Map (SD02) but where their existing lawful planning use falls within Use Class B2, B8 and/or E(g).
64. “Sites for Employment” on the Policies Map (SD02) are the employment allocations detailed in Strategic Policy 29. When sites are clicked in the interactive map this policy will be one that is referenced.

[Q2.b\) Should criteria 1 also refer to intensification?](#)

65. Horsham District Council considers intensification should be referenced alongside upgrading and refurbishment in criterion 1 and removed from criterion 2, and is proposing **suggested modifications (SM31 and SM32 of Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024)** to address this and matters raised in question 2 c and d covered below. It is recognised that if intensification is not included then many proposals for upgrading and refurbishment will not require express planning consent given they may just involve internal works.

[Q2.c\) Does criterion 1 b\) require effects not caused by a development proposal to be mitigated, if so, is this consistent with national policy?](#)

66. Criterion 1 has been positively worded. Criterion 1.b seeks to address issues arising from badly sited employment uses which may have been in existence prior to the current planning system/known planning records and/or prior to the development of the surrounding area which can create challenging issues and the ‘Agent of Change’ principle as detailed in **paragraph 187 of the NPPF**.

67. It is acknowledged that **NPPF paragraph 187** makes clear that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. However, **NPPF paragraph 188** makes clear the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land. **Paragraph 174.e of the NPPF** seeks to ensure both new and existing development does not contribute to, put at unacceptable risk from, or is adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. It makes clear that development, wherever possible, is expected to help improve local environmental conditions. **Paragraph 104 of the NPPF** seeks to ensure transport issues are addressed in development proposals.
68. A suggested **modification (SM31)** to criterion 1 is proposed in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024** to ensure consistency with national policy. This would replace the current wording in criterion b with the alternative: *“they appropriately resolve any issues arising from badly sites uses; and”*. With the modification, the policy is considered consistent with national policy given the upgrading and refurbishment, with the inclusion of intensification, of a premises can lead to an increase in staff/visitors and will extend the life of the use which may no longer be appropriate unless amenity, highway, access and other issues, such as flood risk, are appropriately resolved.

[Q2.d\) Are there potentially other impacts which should be considered which are not covered by criterion 1 c\) and is the policy effective in this regard?](#)

69. Horsham District Council recognise that there are potentially other impacts which should be considered (as reflected above). A suggested **modification (SM31 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024)** is proposed which would replace the current wording in criterion c with the alternative: *“any adverse impacts are appropriately addressed”*. This seeks to ensure any adverse impacts are appropriately addressed. It is considered with this modification the policy is effective.

[Q2.e\) Is the geographical application of this policy on the submission Policies Map accurate?](#)

70. Horsham District Council considers the geographical application of this policy on the submission Policies Map to be accurate except in respect of the Mackley Industrial Estate Key Employment Area (KEA). The Upper Beeding Neighbourhood Plan¹⁰ Policies Map¹¹ depicts the employment site as extending into the Ancient Woodland, however, this is not the case on the ground. When the Council submitted **the Plan (SD01)** they also submitted two proposed modifications **PM003 and PM004 in HDC Schedule of Suggested Modifications to the Regulation 19 Local Plan Policies Map (SD16)** which are considered necessary to make clear the KEA and the built-up area boundary does not include the adjacent Ancient Woodland.
71. Another error in respect of the Mackley Industrial Estate Key Employment Area (KEA) has also come to light. This relates to the western boundary where it is considered the house, Woodside, and its curtilage should not be shown within the KEA boundary. The suggested **Modification (POM02 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024)** is therefore also put forward for consideration.

[Q2.f\) Are the requirements set out in criterion 7 justified and effective?](#)

72. Horsham District Council considers criterion 7 to be justified and effective for the reasons provided in the Council’s summary above as to why the policy is sound. The reasons are similar to those that justify the designation and safeguarding of Key Employment Areas over the lifespan of the Local Plan.

¹⁰ https://www.horsham.gov.uk/data/assets/pdf_file/0003/108624/Upper-Beeding-Referendum-Version-March-2021.pdf

¹¹ <https://www.upperbeeding-pc.gov.uk/wp-content/uploads/2020/12/UB-NP-Policy-Maps.pdf>

It is important to ensure there is sufficient employment land to meet the needs of the increasing population, particularly given the pressures for the release of land to higher land value uses.

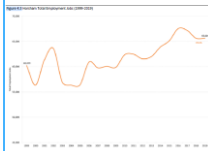
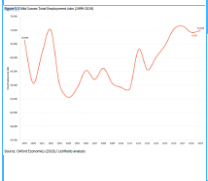
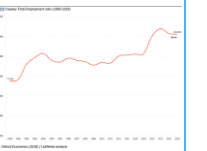
73. **Paragraphs 9.14, 9.15, 9.21, 9.22, and 10.41** of the **Northern West Sussex Economic Growth Assessment, January 2020 (EC02)** advises of a need for continued protection to be placed upon the District's stock of employment sites to ensure that economic development in the District is not undermined by a lack of suitable space (sites and premises). Protection of such sites helps to minimise loss to higher land value uses even though there is a need for employment and helps to facilitate the addressing of demand via intensification where appropriate as reflected in **paragraphs 2.33 and 2.36** of the **Issues and Options document (CD03)**.
74. The criterion makes clear how the regard to viability and the need for employment are to be considered. **PPG: Effective Use of Land (Ref ID: 66-001-20190722)** makes clear that when considering the use of a site one of the factors to take into account is whether there is evidence that the site has been actively marketed for its intended use for a reasonable period, and at a realistic price.
75. **PPG: Viability (Ref ID: 10-010-20180724)** makes clear that "*In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission.*"
76. **PPG (Ref ID: 21b-008-20140306)** similarly makes clear planning is concerned with land use in the public interest rather than the protection of purely private interests.
77. Given the need for the protection of employment premises and sites, care is needed to ensure that an employment use is genuinely no longer viable, in order to protect public interests, and not lost merely for the personal/private gain of a freeholder when a change in the planning use is sought.
78. It is considered evidence of active marketing over the period of at least a year is reasonable when demonstrating redundancy of both the premises and the site for employment use. Indeed, given the potential long-term impact of any reduction in employment space due to short term market fluctuations within an increasing population, a longer period may be considered appropriate.

Appendix 1

Northern West Sussex Economic Growth Assessment, January 2020 – Summary table of Data

Table 1: The following table sets out the data provided in the study in a manner to facilitate data comparisons. The key source of the data in the table comes from: para's 3.4, 3.5, Figure 3.2, 3.9, Table 3.1, Table 3.3, 3.19, Table 3.4, 3.20, 3.28, 3.29, Table 3.5, Table 3.6, 3.34, 3.35, 4.4, 4.5, Figure 4.2, 4.6, 4.7, 4.10, Table 4.1, Table 4.3, Table 4.4, Table 4.5, Table 4.6, Table 4.7, 4.37, 4.38, 5.4, 5.5, Figure 5.2, 5.6, 5.7, Table 5.1, Table 5.3, Table 5.4, Table 5.5, 5.32, Table 5.6, Table 5.7, 5.38, 5.39, 6.2, 6.5, 6.19, 6.36.

		Horsham	Mid Sussex	Crawley	South East	UK
1	Population 2001	122,288 (62.6% working age ie 16-64)	127,444 (63.3% working age ie 16-64)	100,327 (64.3% working age ie 16 to 64)		
2	Population 2007	128,335	134,006	101,605		
3	Population 2017	140,142 (59.6% working age ie 16-64) (14.6% growth since 2001 – but working age pop has only seen 9% growth since 2001) (9.2% growth since 2007)	148,345 (60.2% working age ie 16-64) (16.4% growth since 2001 – but working age pop has only seen 10.8% growth since 2001) (10.7% growth since 2007)	111,664 (64.8% working age ie 16-64) (11.3% growth since 2001) (working age pop has seen 12.1% growth since 2001) (9.9% growth since 2007)	8.7% growth since 2007	7.7% growth since 2007
4	Total working residents (2011 census)	66,864	72,805	55,676		
5	Total Workplace workers in District / Borough (2011 Census)	56,804 (59.9% self containment) (10,060 net commuter out -flow of workers [40.1%])	61,335 (56.2% self containment) (11,470 net commuter out -flow of workers [43.8%])	79,815 (65.7% self containment) (24,139 net commuter in -flow of workers) (96,075 – in 2019)		
6	Top out-commuting destinations	Crawley, Mid Sussex, Westminster, City of London, Brighton & Hove (Of the 40.1% out commuters c.36% to non-NWS locations)	Crawley, Brighton & Hove, Tandridge Westminster, City of London (Of the 43.8% out commuters c.40% to non-NWS locations)	Reigate and Banstead, Mid Sussex, Horsham, Westminster, City of London (c.29% to non-NWS locations)		

		Horsham	Mid Sussex	Crawley	South East	UK
7	Top in-commuting destinations	Crawley, Worthing, Arun, Brighton & Hove (c.30% from non-NWS locations)	Brighton & Hove, Crawley, Wealden, Lewes (34% from non-NWS locations)	Mid Sussex, Horsham, Brighton and Hove and Croydon (42% from non-NWS locations)		
8	Proportion of working age residents in or seeking employment (ie 16-64) (ONS Annual Pop Survey 2018)	79.1%	85.0%	84.8%	80.9%	78.3%
9	Out of Work benefits claimants as a proportion of residents aged 16-64 (Jan 2019)	1.1%	0.8%	1.9%	1.6%	2.4%
10	Proportion of resident workforce holding higher level qualifications at NVQ4 and above. (2018)	42.3%	46.3%	33.2%	41.4%	38.4%
11	No Qualifications (or Other than NVQs or above) (2018)	3.8%	4.2%	7.6%	10.5%	14.8%
12	Median gross weekly earnings by residence (2018)	£649.80	£645.40	£558.70	£614.50	£569.00
13	Median gross weekly earning by workplace (2018)	£538.70	£559.50	£632.80	£589.20	£569.00
		(read with residence earnings this indicates out commuting to higher paid jobs)	(read with residence earnings this indicates out commuting to higher paid jobs)	(read with residence earnings this indicates high in commuting)		
14	Job growth between 1999-2019 (all sectors) (paras 3.6, 4.6, 5.6)	5,455 (9.1% increase – slightly turbulent steady increase) 	1,373 (1.9% increase – turbulent increase) 	23,600 (30.5% increase – relatively steady increase) 	18.7%	20.0%
15	Total workplace jobs in 2011	62,485 (Of total: 13,799 in office jobs, 12,748 in industrial jobs)	63,505 (of total: 13,520 in office jobs, 10,715 in industrial jobs)	86,625 (Of total: 16,400 in office jobs, 25,885 in industrial jobs)		
16	Total workplace jobs in 2019 (Tables 3.1, 4.1, 5.1)	65,664 (5.1% increase since 2011)	71,940 (13.3% increase since 2011)	101,052 (16.7% increase since 2011)		

		Horsham	Mid Sussex	Crawley	South East	UK
		(Of total: 14,000 in office jobs [1.5% increase since 2011], 12,419 in industrial jobs [-2.6% decrease since 2011]. 0.5% decrease in B class jobs which now forms 40% of total workforce down from 42.5%)	(Of total: 16,480 in office jobs [21.9% increase since 2011], 12,355 in industrial jobs [15.3% increase since 2011]. 19% increase in B class jobs which now equates to 40% of total workforce up from 38%)	(Of total: 20,580 in office jobs [25.5% increase since 2011], 28,995 in industrial jobs [12% increase since 2011]. 17.2% increase in B class jobs which now equates to 49% of total workforce up from 48.8%)		
17	Urban / Rural Share of Total District Employment (2019)	67.3% Urban 32.7% Rural (Of total: 37.8% in Horsham Town, 4.5% in Southwater, 3.8% in Billingshurst, 3.2% in Storrington, 2.8% in Steyning, 1.8% in Henfield, 2.0% in Pulborough, 0.6% in West Chiltington Common, 43.5% elsewhere in District)	76.5% Urban 23.5% Rural (Of total: 24.1% in Haywards Heath, 25.4% in Burgess Hill, 16% in East Grinstead)	N/A (c.25% on-airport / Gatwick jobs) (29% in Manor Royal) (14% in Town Centre)		
18	Home working / Work at Home percentage (2011)(Coast to Capital LIS)	15% (9,933)	13% (9,685)	7% (3,724)		(Coast to Capital LEP area: 11%) (London: 10%)
19	Number of Business Enterprises (2018)	8,305 (16.8% increase from 2010)	8,250 (15.1% increase since 2010)	4,620 (23.5% increase since 2010)		
20	Business Size: Micro (0 to 9)	90.5%	90.3%	85.9%	89.9%	89.3%
21	Business Size: Small (10 to 49)	8.1%	8.1%	10.4%	8.2%	8.7%
22	Business Size: Medium (50 to 249)	1.1%	1.3%	2.6%	1.5%	1.6%
23	Business Size: Large (250 +)	0.2%	0.3%	1%	0.4%	0.4%

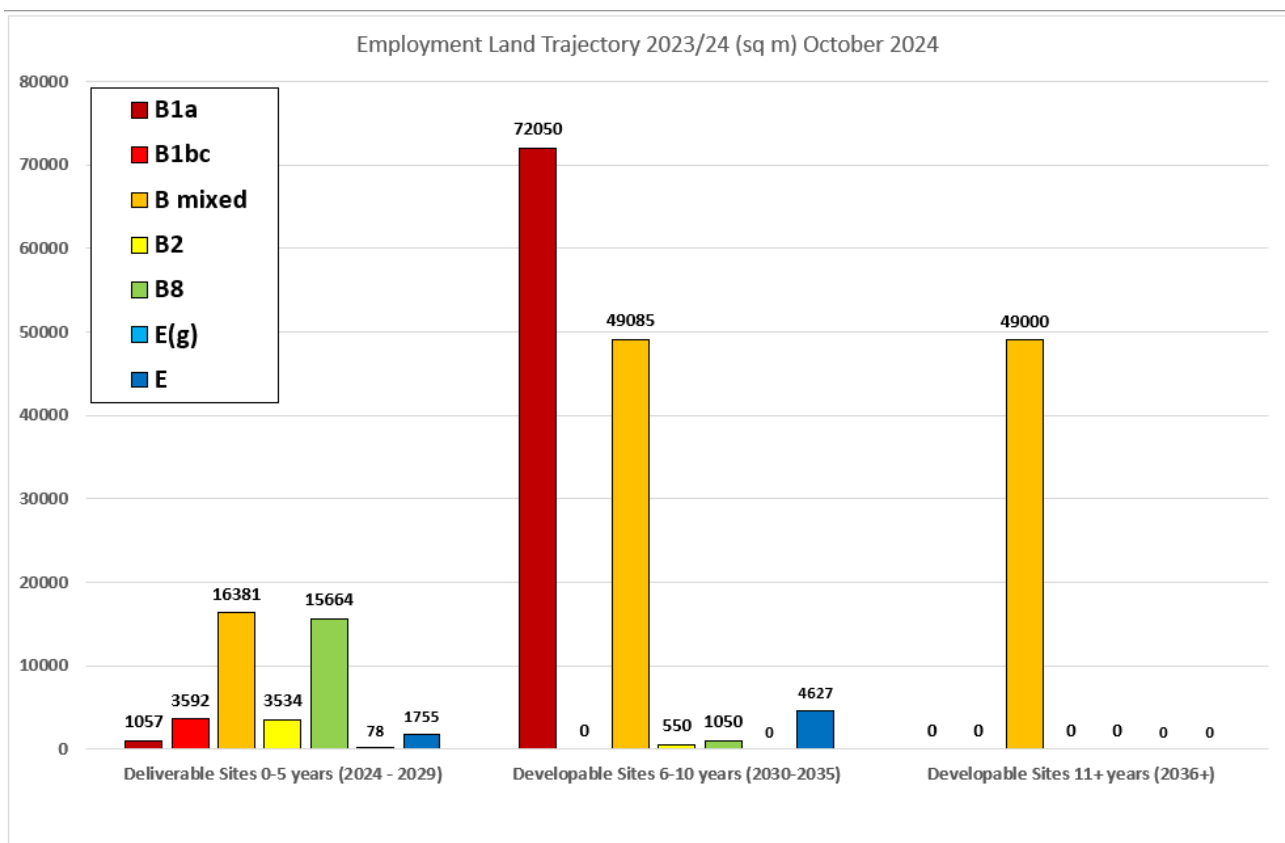
		Horsham	Mid Sussex	Crawley	South East	UK
24	Self-employment	13%	13.4%	7.3%	11.9%	10.6%
25	Start-ups per 10,000 working age residents (2018)	89.2	101.3	72.5	92.7	91.9
26	Start Up Rate, 2018 (per 1,000 businesses) (based on existing stock of businesses) (from Draft Coast to Capital Local Industrial Strategy, 2019)	94	113	132	(Coast to Capital area – 119)	132
27	Enterprises 5 yr Survival Rates (business birth in 2012)	49.3%	48.9%	42.5%	44.8% (West Sussex : 47%)	43.2%
28	Total B class floorspace (2019)	691,000sqm (100%)	617,000sqm (100%)	1,044,000sqm (100%) (significantly greater than that of the 6 authorities surrounding)		
29	<i>Office Floorspace (2019)</i>	<i>145,000sqm (21%)</i>	<i>158,000sqm (25.6%)</i>	<i>360,000sqm (34.5%)</i>		
30	<i>Industrial Floorspace (2019)</i>	<i>546,000sqm (79%)</i>	<i>459,000sqm (74.4%)</i>	<i>684,000sqm (67.5%)</i>		
31	Gross Value Added per worker (1999)	£45,800	£38,100	£42,700	£46,200	£42,100
32	Gross Value Added per worker (2019)	£57,100 (24.9% change since 1999)	£52,800 (38.9% change since 1999)	£51,300 (20.1% change since 1999)	£55,700 (20.7% change since 1999)	£51,700 (22.6% change since 1999)

Appendix 2

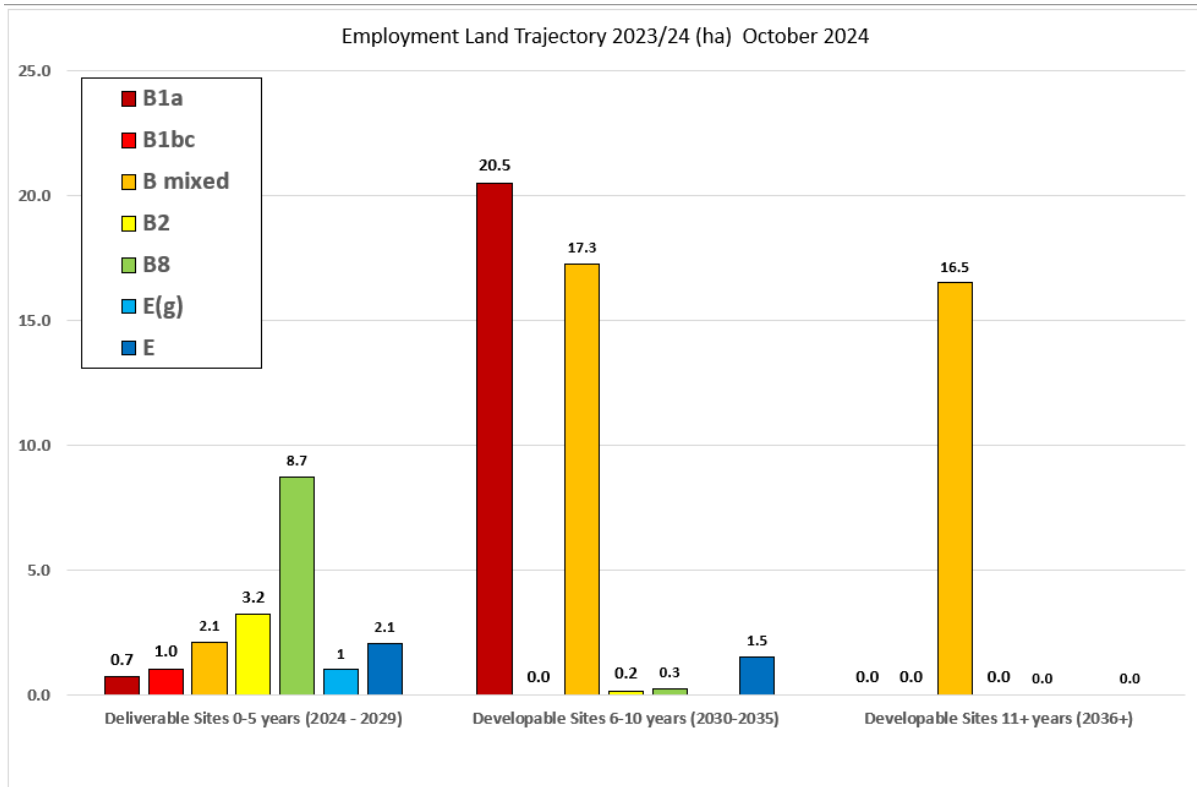
Employment Land Trajectory Including Proposed Employment Allocations (April 2024)

The following the Employment Land Trajectory applying the latest monitoring data from the year 2023/24 based on current permissions. The 2023/24 completions/commitments data is provisional because it has not yet been agreed by West Sussex County Council. Once agreed it will provide the employment land figures for the Authority Monitoring Report 2023/24.

Time Period	Employment floorspace (sqm)							
	B1a	B1b,c	B (mixed)	B2	B8	E(g)	E	TOTAL
Deliverable Sites 0-5 years (2021 - 2026)	1,057	3,592	16,381	3,534	15,664	78	1,755	42,061
Developable Sites 6-10 years (2027-2031)	72,050	0	49,085	550	1,050	0	4,627	127,362
Developable Sites 11+ years (2032+)	0	0	49,000	0	0	0	0	49,000
TOTAL	73,107	3,592	114,466	4,084	16,714	78	6,382	218,423



Time Period	Land Area (Hectares)							
	B1a	B1b,c	B (mixed)	B2	B8	E(g)	E	TOTAL
Deliverable Sites 0-5 years (2021 - 2026)	0.7	1.0	2.1	3.2	8.7	0.1	2.1	17.9
Developable Sites 6-10 years (2027-2031)	20.5	0	17.3	0.2	0.3	0	1.5	39.8
Developable Sites 11+ years (2032+)	0	0	16.5	0	0	0	0	16.5
TOTAL	21.2	1.0	35.9	3.4	9.0	0.1	3.6	74.2



The table over the page provides details of the sites included within the employment trajectory.

Local Plan Employment Land Trajectory (24 Oct 2024)

Pink = Permissions Blue = Allocations [Local Plan, West of Bewbush JAAP, saved Horsham District Planning Framework (HDPF) policies] Purple = Allocation (Neighbourhood Plans)

Deliverable Sites 0-5 years (2024-29)												
Site Ref	Site Name	Site Address	Occupier		Available Site Area (Ha)	Main Use	Business Floor Space (Sq m)	Suitable	Available	Achievable	Planning Status	Planning Reference
	New Wharf Farm	Horsebridge Common	Ashurst	Unknown	0	B8	260.0	YES	YES	YES	ICE	DC/21/0969
	Units A and D Daux Road	Billingshurst	Billingshurst	Wesbart UK Ltd	0.23	B2	130.0	YES	YES	YES	DET	DC/21/1638
	Rosier Business Park	Coneyhurst Road Billingshurst	Billingshurst	Unknown	0.03	B8	253.0	YES	YES	YES	DET	DC/20/1494
	Rosier Business Park	Coneyhurst Road	Billingshurst	Unknown	0.07	B8	610.0	YES	YES	YES	DET	DC/21/1162
	Station Works	Myrtle Lane	Billingshurst	Lamina Dialectics	0.4	B1_O	314.0	YES	YES	YES	ICE	DC/13/1346
	Four Seasons Fuel	Coneyhurst Road	Billingshurst	Four Seasons Fuel	1.9	B8	60.0	YES	YES	YES	ICE	DC/17/0596
	47 - 55 High Street	Billingshurst	Billingshurst	Unknown	0.03	B1_O	65.0	YES	YES	YES	DET	DC/19/2526
	McVeigh Parker and Co Ltd	Stane Street	Billingshurst	McVeigh Parker and Co Lt	0.6	B8	4700.0	YES	YES	YES	ICE	DC/18/2658
	Land North of Hilland Farm	Stane Street	Billingshurst	Unknown (Units 1, 2a & 2b)	0	B1_F	1093.0	YES	YES	YES	ICE	DC/18/2122
	Billingshurst Trade Park	Stane Street	Billingshurst	Unknown	0	B8	1175.0	YES	YES	YES	DET	DC/21/2077
	Billingshurst Trade Park	Stane Street	Billingshurst	Unknown	0	B1_F	2295.0	YES	YES	YES	DET	DC/22/0341
	Hilland Farm	Hilland Road	Billingshurst	Unknown	0	B2	624.0	YES	YES	YES	DET	DC/21/1223
	Hilland Farm	Hilland Road	Billingshurst	Unknown	0	B2	768.0	YES	YES	YES	DET	DC/21/1224
	Hilland Farm	Hilland Road	Billingshurst	Unknown	0	B2	716.0	YES	YES	YES	DET	DC/21/1224
	Hilland Farm	Hilland Road	Billingshurst	Unknown	0	B2	756.0	YES	YES	YES	DET	DC/21/1224
	Hilland Farm	Hilland Road	Billingshurst	Unknown	0	B1_F	1550.0	YES	YES	YES	DET	DC/22/1053
	Hilland Farm	Hilland Road	Billingshurst	Unknown	0	B1_F	1336.0	YES	YES	YES	DET	DC/22/1055
	Hilland Farm	Hilland Road	Billingshurst	Unknown	0	B1_F	1622.0	YES	YES	YES	DET	DC/22/1056
	Capons Hill Farm	Station Road	Cowfold	Unknown	0.5	B8	100.0	YES	YES	YES	DET	DC/20/0316
	Delspride	Kent Street	Cowfold	Unknown	0.1	B1_F	485.0	YES	YES	YES	DET	DC/22/0468
	Holmbush Farm	Crawley Road	Faygate	Unknown	0.02	E	380.0	YES	YES	YES	DET	DC/22/0413
	Pear Tree Farm	Furners Lane	Henfield	Unknown	0.12	B8	654.0	YES	YES	YES	DET	DC/23/0639
	Land North West of Rushmears Nursery	Sandy Lane	Henfield	Unknown	0.08	B8	800.0	YES	YES	YES	DET	DC/22/1105
	Whiteoaks	Shoreham Road	Small Dole	Unknown	0.23	B8	279.0	YES	YES	YES	DET	DC/23/1002
	Greenacres	New Barn Lane	Henfield	Unknown	0.03	B8	255.0	YES	YES	YES	DET	DC/23/0222
	Units B	Blatchford Road	Horsham	Emcel Filters Ltd	0.56	B8	206.6	YES	YES	YES	ICE	DC/20/2391
	Unit 6 Redkiln Close	Horsham	Horsham	HTS Spares Ltd	0.03	B8	246.0	YES	YES	YES	DET	DC/21/2027
	Unit B2 Foundry Lane	Horsham	Horsham	Aerospace Logistics Ltd	0.05	B8	457.0	YES	YES	YES	DET	DC/21/0630
	Unit 2 Graylands Estate	Langhurst Wood Road	Horsham	The Printed Word Busines	0.01	B1_O	88.4	YES	YES	YES	DET	DC/21/0372
	Raidons	Nutbourne Lane	Pulborough	Unknown	0.1	B8	375.0	YES	YES	YES	DET	DC/22/1967
	Barnwood	Faygate Lane	Rusper	Unknown	0.1	B8	126.0	YES	YES	YES	ICE	DC/19/1964
	Units 1-3	Millfields Barn	Rowhook	Not known	0.2	B8	412.0	YES	YES	YES	ICE	RW/9/02
	Smithers Farm	Guildford Road	Rudgwick	Unknown	0.05	B1_I	560.0	YES	YES	YES	ICE	DC/19/1787

Deliverable Sites 0-5 years (2024-29) - Continued												
Site Ref	Site Name	Site Address	Occupier		Available Site Area (Ha)	Main Use	Business Floor Space (Sq m)	Suitable	Available	Achievable	Planning Status	Planning Reference
	Windacres Farm Development Site	Church Street	Rudgwick	Unknown	0.01	B1_O	116.0	YES	YES	YES	DET	DC/19/0374
	Units 1 To 7 and 6B Spring Copse Business Park	Stane Street	Slinfold	Unknown	0.45	B8	1440.0	YES	YES	YES	ICE	DC/20/0279
	Bridge Farm	Stane Street	Slinfold	Unknown	0.78	B8	401.0	YES	YES	YES	ICE	DC/22/0887
	Woodside	Guildford Road	Clemsfold	L Laker LTD	0.03	B1_I	150.0	YES	YES	YES	ICE	DC/12/0804
	Ex Arun Feed Mills	Sincox Lane	Shipley	Unknown	0.4	B1_I	1235.0	YES	YES	YES	ICE	SP/48/98
	Thornhill Court	Billingshurst Road	Coolham	Unknown	1.35	B8	1320.0	YES	YES	YES	DET	DC/22/0877
	Bentons Place	Hooklands Lane	Shipley	Unknown	0.06	B1_I	522.0	YES	YES	YES	DET	DC/19/1458
	West Wantley Farm	Fryern Road	Storrington	Unknown	0.14	B8	150.0	YES	YES	YES	DET	DC/22/2252
	Former B and W Building	Elm Grove Lane	Steyning	Unknown	0.15	B1_O	139.0	YES	YES	YES	ICE	DC/20/0789
	11 Church Street	11 Church Street	Steyning	Steyning Grammar	0.07	E(g)(i)	78.0	YES	YES	YES	DET	DC/23/2161
	Abingworth Nurseries	Storrington Road	Thakeham	Unknown	0.1	B1_I	957.0	YES	YES	YES	ICE	DC/10/1314
	Fly Farm (Units Y)	Sinnocks	West Chiltington	Not known	0.4	B1_I	168.0	YES	YES	YES	ICE	DC/06/0828
	Stables On Land South of Mill Lane	Mill Lane	Partridge Green	Unknown	0.01	B1_O	90.0	YES	YES	YES	ICE	DC/18/1828
	Swallows Farm	Swallows Lane	Dial Post	Building B	1.3	B8	236.0	YES	YES	YES	ICE	DC/19/2014
	Swallows Farm	Swallows Lane	Dial Post	Building D	0	B1_O	121.0	YES	YES	YES	ICE	DC/19/2014
	Firland Park Estate	Henfield Road	Woodmancote	Unknown	3	B2	540.0	YES	YES	YES	ICE	DC/23/2037
	Field Place Farm House	Field Place Byfleets Lane	Broadbridge Heath	Unknown	0.1	B1_O	124.0	YES	YES	YES	DET	DC/22/1298
	Northlands Business Park	Bognor Road	Warnham	Unknown	0.14	E	206.0		YES	YES	DET	DC/23/0903
	Storage Building Maxland Farm	Northlands Road	Warnham	Unknown	0.1	B8	233.5	YES	YES	YES	DET	DC/19/2378
	Senlac Building 2	Shoreham Road	Henfield	Unknown	0	B8	915.1	YES	YES	YES	ICE	DC/20/0049
	Land at Sumners Ponds	Chapel Road	Barns Green	Unknown	1.9	E	1169.0	YES	YES	YES	ICE	DC/21/2697
TOTALS	Non Strategic				15.93		34061.53					
SA289	Kilnwood Vale	West of Bewbush, Colgate	Kilnwood Vale	Unknown	2	B1_F	8000.0	Yes	Yes	Yes	O/L	DC/10/1612
TOTALS	Strategic location				2		8000.0					
TOTALS	(0-5 years)				17.93		42061.53					

Deliverable Sites 6-10 years (2030-2035)												
Site Ref	Site Name	Site Address	Occupier		Available Site Area (Ha)	Main Use	Business Floor Space (Sq m)	Suitable	Available	Achievable	Planning Status	Planning Reference
	Nowhurst Business Park	Guildford Road	Broadbridge Heath	Unknown	2.69	B1_F	26942	YES	YES	YES	O/L	DC/17/2131
	Brinsbury Fields	Brinsbury College	Pulborough	Unknown	12.51	B1_F	16850	YES	YES	YES	O/L	DC/17/0177 & DC/16/2963
SA225	Land at Platts Roundabout	Newbridge Road	Billingshurst	Unknown	1.51	E	4627	YES	YES	YES	O/L	DC/22/0518
	Land North of Hilland Farm	Stane Street	Billingshurst	Unknown	0	B1_F	2293	YES	YES	YES	O/L	DC/18/2122
	Former Novartis Site	Parsonage Road	Horsham	Unknown	3.4	B1_O	25000	YES	YES	YES	O/L	DC/18/2687

Deliverable Sites 6-10 years (2030-2035) - Continued												
Site Ref	Site Name	Site Address		Occupier	Available Site Area (Ha)	Main Use	Business Floor Space (Sq m)	Suitable	Available	Achievable	Planning Status	Planning Reference
	Southgrounds (Site E Henfield NP)	Shorehamd Road	Henfield	Unknown	0.9	B1_F	1500					
	N of Old Brickworks (Site F Henfield)	Shorehamd Road	Henfield	Unknown	1.16	B1_F	1500					
SA854	North Horsham Business Park	Land North of Horsham	Horsham	Unknown	17	B1_O	46450	YES	YES	YES	O/L	DC/16/1677
SA118	Land East of Billingshurst		Billingshurst		0.10	B1_O	600	Yes	Yes	Yes		
SA118	Land East of Billingshurst		Billingshurst		0.15	B2	550	Yes	Yes	Yes		
SA118	Land East of Billingshurst		Billingshurst		0.25	B8	1050	Yes	Yes	Yes		
TOTALS	(6-10 years)				39.67		127362					

Deliverable Sites 11+ years (2036+)												
Site Ref	Site Name	Site Address			Available Site Area (Ha)	Main Use	Business Floor Space (Sq m)	Suitable	Available	Achievable		
EM1	Land South of Star Road Industrial E Partridge Green	Partridge Green			3.80	B1_F	9000	Yes	Yes	Yes		
EM2	Land to the West of Graylands Estat Langhurstwood Road	Horsham			3.00	B1_F	9000	Yes	Yes	Yes		
EM3	Land at Broomers Hill Business Park,	Pulborough			2.70	B1_F	7000	Yes	Yes	Yes		
EM4	Land South West of Hop Oast Roundabout	Southwater			1.00	B1_F	3000	Yes	Yes	Yes		
SA101	Land West of Ifield	Ifield			2.00	B1_F	3000	Yes	Yes	Yes		
SA119	Land North West of Southwater	Southwater			4.00	B1_F	18000	Yes	Yes	Yes		
TOTALS	(11+ years)				16.5		49000					

OVERARCHING TOTALS	74.1ha	218423.53 sqm
Allocations - Local Plan 2023-2040	17.00ha	51200 sqm
Allocations - Other (NPs, JAAP, HDPF)	22.96ha	59534.1 sqm
Allocation TOTALS	39.96ha	110734 sqm
Commitment/Available TOTALS (excl 'other' Allocations)	34.14ha	107689.48 sqm
Commitment/Available TOTALS (incl 'other' Allocations)	57.10ha	167223.5 sqm

Appendix 3

Industrial Estates Occupancy Percentage Headlines 2018-2019 and March 2021

	<u>Occupancy No. and %:</u>		<u>Occupancy No. and % :</u>		<u>Designated KEA in Proposed Submission Local Plan (Reg 19)</u>
	<u>Aug 2018-July19</u>		<u>Mar 2021</u>		
Wiston Business Park, Ashington	4/4	100%	4/4	100%	Yes
Daux Road, Billingshurst	36/36	100%	33/37	89%	Yes
Eagle Estate, Billingshurst	-	-	8/8	100%	<i>(Yes as part of Huffwood below)</i>
Huffwood Trading Estate, Billingshurst	29/30	97%	21/25	84%	Yes
Gillmans Estate, Billingshurst	19/23	80%	28/28	100%	Yes
Rosier Farm Industrial Estate / Rosier Business Park, Billingshurst	19/21	91%	42/45	93%	Yes
Blackhouse Farm, Colgate	9/9	100%	20/23	87%	
Thornhill Court, Coolham	10/10	100%	14/14	100%	
Oakendene Manor Farm / Oakendene Industrial Estate, Cowfold	58/58	100%	123/127	97%	Yes
Henfield Business Park, Henfield	50/54	91%	51/55	93%	Yes
Nightingale Road, Horsham	20/21	95%	20/21	95%	Yes
Foundry Lane, Horsham	79/89	88%	87/93	94%	Yes
Parsonage Business Park, Horsham	23/23	100%	12/12	100%	Yes
Blatchford Road Industrial Estate, Horsham	65/68	96%	80/84	95%	Yes
North Heath Lane, Horsham	11/14	79%	14/18	78%	Yes
Lawson Hunt Estate, Broadbridge Heath	26/30	87%	28/30	93%	Yes
Southwater Business Park	0/3	0%	2/3	67%	Yes
Oakhurst Business Park, Southwater	23/23	100%	21/33	64%	Yes
Little Park Farm, Ifield	17/21	84%	15/15	100%	
Holmbush Potteries, Faygate	20/22	91%	26/26	100%	
Faygate Business Centre, Faygate	14/15	93%	14/15	93%	
New House Business Centre, Faygate	19/20	95%	19/20	95%	
Broadlands Business Campus, North Horsham	6/7	86%	7/7	100%	

	<u>Occupancy No. and %:</u>		<u>Occupancy No. and % :</u>		<u>Designated KEA in Proposed Submission Local Plan (Reg 19)</u>
	<u>Aug 2018-July19</u>		<u>Mar 2021</u>		
Graylands Estate, North Horsham	30/31	97%	39/46	85%	Yes
Huffwood Trading Estate, Partridge Green	30/34	88%	40/40	100%	<i>(Yes as part of Star Road below)</i>
Star Road Industrial Estate, Partridge Green	43/49	88%	47/58	81%	Yes
Broomers Hill Park, Pulborough	14/14	100%	14/14	100%	
Station Yard / Station Approach, Pulborough	12/14	86%	12/12	100%	Yes
Slinfold Business Park / The Business Park / Maydwell Business Park, Slinfold	10/10	100%	12/12	100%	Yes
Spring Copse Business Park, Slinfold	9/9	100%	9/10	90%	Yes
Mackley Industrial Estate, Small Dole	63/69	91%	61/63	97%	Yes
The Chantry Industrial Estate, Storrington	19/30	64%	12/33	36%	
Water Lane, Storrington	26/26	100%	26/33	79%	Yes
Rock Business Park, Washington	18/18	100%	15/19	79%	Yes