



Project	Land East of Ashington, West Sussex
Document	Horsham District Council Local Plan 2023-2040 Matter 7 Hearing Statement - Welbeck Strategic Land IV LLP

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 Government seeks significant weight to be placed on the need to support economic growth and productivity and a positive and proactive encouragement of sustainable economic growth. This means the currently identified need for employment floorspace should be applied as a ‘floor’, and not used to limit further growth above these amounts.

The draft Local Plan and specifically strategic employment policy 29 is considered unsound in that it does not sufficiently plan for future economic growth in the District. The Local Plan is based on economic evidence which was prepared in 2020 and as such does not take account of more recent changes in the industrial sector resulting from Covid and/or Brexit, more recent trends in the Horsham market and significantly, excludes consideration of the south of the District and the Sussex Coastal Area. It is therefore considered to be out of date.

Whilst the Economic Growth Assessment (EGA) Update presents a number of economic growth scenarios, these are informed by economic forecasts heavily biased to the early impacts of the COVID pandemic lockdown, whilst the completion trend relied upon do not account for more recent activity. As such the lower end of the range presented in the EGA Update and carried through to the draft Local Plan should be discounted, as identified in the Marrons Employment Needs Assessment (February 2024) which accompanies the Reg 19 Submissions.

The EGA and Focused Update concluded that the recommendations of the 2020 EGA be carried through in adopting a ‘baseline labour supply scenario’ and past take up evidence upon which to base the future plan. It is considered however, that this represents more of a ‘do minimum’ approach which does not fully satisfy the future needs of the District. The delay in the local plan review requires higher levels of housing growth in the future to 2037 and despite the stated aims of the Council in the Draft Local Plan (only 777 homes pa) this is not considered to be sufficient or sound. The medium scenario (1,200 dpa) and high growth scenario (1,400 dpa) are more likely to be required to meet future local plan requirements but should also form the basis of a more proactive and responsive employment land target for the District to 2037.

There is a clear lack of available strategic warehouse stock within Horsham, and no account within the Council’s evidence of the need to replace aged stock which is no longer fit for purpose. As such there is a significantly higher objectively assessed need than that recognised by the Council, and as such a need for more sites, in a greater variety of industrial uses.



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There is also an identified unmet need, most notably in Brighton and Hove for assistance in meeting employment needs, but also levels of unmet need noted within the Worthing Inspectors Local Plan Examination Report.

Applying more recent trends in past completions suggests a need for 66ha of employment land, however account should also be given to a further 5 year margin of flexibility increasing need to 85ha.

The Land East of Ashington site itself is located in an area which has a clear functional relationship with South Coast authorities and can assist in meeting unmet needs of those surrounding authorities, as well as providing greater choice and availability of units within Horsham. The proposed development will bring about significant economic benefits, both in respect of temporary job creation during the construction phase, and significant levels of job creation during the schemes operation, benefiting residents within both Horsham District, and the South Coast authorities with which Ashington has a functional relationship.

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?

Whilst the EGA and Focused Update identify forecasts of lower level of future employment growth there has been a lack of delivery in employment land which is recognised by the local plan review evidence base and Reg 19 document.

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.

The EGA Focused Update includes a table of Committed Sites (Table 3.1 copied below) at para 3.3 which amounts to some 146,205m² of committed employment floorspace supply, none of which has been delivered in the District during the HDPF plan period (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, as set out in the accompanying Marrons Employment Needs Assessment.

The Land East of Ashington can address the immediate needs of local companies and is considered to meet needs for an appropriate, purpose built, well located and accessible site within the District. The availability of deliverable and developable land has proved to be elusive, not helped by many allocated employment sites forming part of larger strategic allocations, with housing phased earlier than employment and the costs of infrastructure.



ECE Planning

The EGA also lays bare the lack of B2 and B8 supply/commitments in the District with none of the Major Employment Commitments having delivered planning permissions for E(g), B2 or B8 developments (although Mixed B class is represented) in the HDPF plan period.

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.