
Examination Statement

Land at Westons Farm, Horsham

The Westons Farm Trust

Horsham District Council – Local Plan 2023 - 2040
Examination in Public
Matter 7 – Economic Development

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1. Introduction

- 1.1. This Examination Statement is submitted by Savills, on behalf of the Westons Farm Trust (WFT), in response to Matter 7 – Economic Development and to support the continued promotion of Land at Westons Farm, Warnham ('the site') as a suitable strategic employment site (Representation Reference 1207764).
- 1.2. Prior to the submission of the HDLP to the Planning Inspectorate for examination, WFT has participated in the formal consultation of the Local Plan at the R18 and R19 stage in respect of the Site. This Examination Statement should therefore be read in conjunction with the R18 and R19 representations.
- 1.3. The location of the Site, its surroundings and the vision have been set out in detail at the R19 Stage and have therefore not been reproduced in detail in this statement.
- 1.4. This Examination Statement responds to the relevant questions raised by the Inspector within Matter 7: Employment.
- 1.5. For the avoidance of doubt, any policies referred to within this Statement relate to the Submission Draft Local Plan unless otherwise stated.

2. Response to the Inspectors Questions

Matter 7 – Economic Development

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

Q.1 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?

- 2.1. In response to Q1 and part a) above, WFT do not consider Strategic Policy 29 to be justified or effective. It has failed to make appropriate allowance for the identified employment need. Therefore the inputs utilised to determine the level of employment supply are inappropriate. Strategic Policy 29 therefore cannot be found sound.
- 2.2. As itemised within page 9 of the R19 representation, The draft Local Plan has been informed by various employment reports, the most recent of which is the Northern West Sussex Economic Growth Assessment (EGA), which was published in November 2020. The EGA summarises that the net B class employment floorspace requirements over the Local Plan period (i.e. 2019 to 2036) reflect a range of potential growth trajectories and assumptions. The EGA advises that under the baseline labour demand scenario, the Council will need to provide at least 166,990 sqm of B class floor space which extends up to a need for 303,820 sqm of B class floor space under the high growth alternative labour supply scenario over the plan period. This floorspace equates to 37.5 Ha for the baseline scenario, and 68.1 Ha under the high growth alternative.
- 2.3. Within Policy 29 and its supporting text, it is therefore not clear how HDC seeks to meet the identified land requirement as set out in the EGA. It appears HDC is currently only seeking to allocate an additional 17 Ha of employment land on top of existing employment commitments (totalling 13.9 Ha).
- 2.4. There is clearly a significant identified need to accommodate further employment growth within the District and it is imperative that the draft Local Plan does more to deliver a greater quantum of employment land to accommodate the identified employment need.

2.5. On this basis, Land at Westons Farm currently being promoted by WFT, presents a high quality employment allocation opportunity, which is well located to the strategic road network and will make a valuable contribution in addressing the additional need for employment land.

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?

2.6. In response to Q2 part b) above, according to the draft Local Plan, HDC are currently proposing to deliver a total employment land supply of 139,192 sqm (13.9 Ha) from existing commitments and a further 170,000 sqm (17 Ha) from site allocations (of which 6.5 Ha is to be provided through the larger strategic residential led allocations). WFT question the effectiveness of Draft Policy 29 to meet the identified employment requirements given that the total amount of employment floorspace to be provided through allocations and commitments is significantly below what is required as set out within HDC's own evidence base.

2.7. Furthermore, HDC are proposing 6.5 Ha of employment land to be accommodated across strategic housing focused allocations. WFT do not consider that there is a clear rationale in choosing to deliver employment supply across strategic housing focused sites compared to the delivery of stand-alone employment sites within the District. It is important to recognise that the allocation of stand-alone sites such as Land at Westons Farm will inevitably mean a shorter delivery timescale, as these sites are unhindered by wider phasing considerations and therefore would be key to ensuring employment delivery in the earlier stages of the Plan Period.

2.8. It is therefore WFT's view that further consideration should be given to the allocation of additional sites in the most sustainable locations across the District such as Land at Westons Farm.

2.9. Accordingly, the inputs used in the process of determining employment supply for the plan period are not considered to be sound or effective.

c) Are the overall employment land requirements and supply provided by the Plan justified and effective? What is the evidence that the employment supply will be delivered within the plan period and that the employment requirement will be met?

2.10. This question will need to be addressed by HDC as part of the upcoming hearing sessions, however, WFT consider there is very limited evidence available to demonstrate how the employment supply will be delivered across the Local Plan Period with regard to timescales.

2.11. Further to the above, the evidence base that is currently available is considered unsound as it is unjustified, inconsistent with national policy and ineffective. The Employment Land Assessment (produced by Savills Economics), which accompanied our R19 representation specifically noted the following key shortcomings of the North West Sussex Economic Growth Assessment (EGA) (2020):

- *Employment forecasting did not fully capture market signals*
- *Past development rates have been supply constrained and are reflected in low development rates despite there being tight availability / vacancy.*
- *Past development rates do not extrapolate Gatwick Airport growth, and the potential for overflow demand from Crawley into Horsham.*
- *There is consequently a real danger that actual employment needs will not be met over the plan period, either for the district or to support the wider strategy and growth plans for the Gatwick Diamond; and*
- *Labour force demand based projections illustrate the need to proactively plan for a scenario which delivers a much higher level of employment land provision*

2.12. The EGA itself is now four years old and it is notable that the Mid Sussex District Plan, which was also recently under examination (Stage 1 Hearing Sessions), was supported by a focussed update to the EGA, dated 2022. Notably the 2020 NWS EGA states, at para 10.48, that expansion at Gatwick “...*may have some implications for the overall type and scale of employment land provision to be planned for within the North West Sussex, and therefore the conclusion of the EGA may need to be reviewed in this context*”. Given the live DCO process for the airport expansion this has the potential to have a very real impact on employment land needs in the district during the plan period.

2.13. There is also further evidence of unmet need for employment floorspace within the wider West Sussex and Greater Brighton sub-regions. Specifically, within the BHCC recent Employment Land Study 2024, there is strong demand for additional industrial space from growth sectors including the cultural industries, which are not currently being met within the city of Brighton and Hove. BHCC alone has an identified shortfall of 56,386 sqm of industrial space over the period of 2041. Overall, BHCC considered there to be a strong requirement to address this further unmet need through the emerging Horsham Local Plan as it is very unlikely to be fully accommodated within the city given the well documented constraints to land availability.

2.14. On the basis of the above, WFT question the current evidence base and consider that Horsham District should be actively contributing towards unmet need from the wider West Sussex and Greater Brighton Sub-regions. Overall, the draft Local Plan has failed to make an appropriate allowance for unmet need from neighbouring authorities.

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

2.15. WFT consider criteria 1-10 to be largely effective. Furthermore, if Land at Westons Farm was to be allocated, proposals would fully meet the relevant criteria.

e) Are allocations EM1-EM4 soundly based, with particular regard to the mix of uses and constraints identified?

2.16. WFT consider that HDC need to include an additional range of employment sites in their plan, in which Land at Westons Farm is a good example of a site that in isolation of any wider development proposals can deliver in the short, medium and long term to help address identified needs for employment development.

2.17. ***Q2. Is Strategic Policy 30 Enhancing Existing Employment sound?***

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?

b) Should criteria 1 also refer to intensification?

c) Does criterion 1 b) require effects not caused by a development proposal to be mitigated, if so, is this consistent with national policy?

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?

e) Is the geographical application of this policy on the submission Policies Map accurate?

f) Are the requirements set out in criterion 7 justified and effective?

- 2.18. WFT consider Draft Policy 30 is largely sound, in that it seeks to protect existing employment sites and lists a number of existing key employment areas.
- 2.19. Whilst WFT appreciate the overarching need to protect existing employment sites, it is notable that the evidence base supporting the plan considers significant elements of the existing employment floorspace across the district to be unsuitable. For example the EGA 2020 identified existing operational employment sites in the District to be limited and undermined by a lack of suitable space.
- 2.20. Overall, unless there is an incentive for the Key Employment Areas to be upgraded and regenerated, there is a high chance that the existing unsuitable employment floorspace in the District will remain as such. It is therefore imperative that more employment land is allocated, including Land at Westons Farm, which proposes approximately 51,802 sqm of new employment space (Class E, B2 and B8 uses) across a 17 Ha site (please refer to the accompanying Masterplan submitted as part of the R19 Representation).

3. Conclusions

- 3.1. This Examination Statement has been prepared on behalf of The Westons Farm Trust with regards to Land at Westons Farm. It provides answers to the questions raised by the Planning Inspector under *Matter 7: Economic Development* of the MIQ's
- 3.2. There is strong concern regarding the appropriateness of the very modest level of employment floorspace proposed in the context of the overall requirement both within Horsham and within the wider sub-region. Notably there does not appear to be any attempt to consider contributing towards meeting neighbouring and identified unmet employment need, when additional suitable employment sites are available for allocation.
- 3.3. In order to deliver a sound and effective plan, a greater level of employment delivery is required. BHCC alone has an identified shortfall of 56,386sq.m industrial space over the period of 2041. Accordingly the planned level of employment floorspace delivery set out by HDC is manifestly insufficient given the evidenced need. As such the level of employment growth across the plan period needs to be significantly increased in order to appropriately address identified needs and be found sound.

Guy Dixon
Director

