



Examination Statement

Land at Lennox Wood, Southwater

Horsham District Council Local Plan
Examination in Public

Matter 7: Economic Development

Date of Hearing Statement: 22nd November 2024
Date of Hearing Session: 19 December 2024

Reference ID: 1207741

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1. Introduction

- 1.1. This Examination Statement has been prepared on behalf of Royal and Sun Alliance Insurance Ltd c/o Columbia Threadneedle Investments (CTI) with specific regard to the land at Lennox Wood, Southwater ('The Site').
- 1.2. Prior to the submission of the HDLP to the Planning Inspectorate for examination, CTI has participated in the formal consultation of the Local Plan at the R19 stage (January - March 2024). The representor number is 1207741.
- 1.3. The location of The Site, its surroundings and the development vision have been set out in detail at the R18 stages and the R19 Stage and have therefore not been reproduced in detail in this statement.
- 1.4. This Statement relates to Matter 7: Economic Development with specific regard to Strategic Policy 30 and the Key Employment Areas.
- 1.5. For the avoidance of doubt, any policies referred to within this Statement relate to the HDLP 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?

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?

2.1. A number of these questions are for HDC to answer. CTI wishes to make some general points on the overall soundness of the policy, specifically its application to CTI’s land interests in Southwater (Lennox Wood).

2.2. HDC’s economic growth strategy is not clearly defined and does not appear to be supported by up-to-date evidence. For example the EGA update is dated November 2020 which is used to inform the approach to economic growth and employment land policies. The EGA, however, pre-dates water neutrality and reflects the growth period of 2019 – 2036 instead of the Plan Period. Therefore, the growth strategy set out in Chapter 9 of the HDLP, is not presently justified.

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- 2.3. Furthermore, HDC's water neutrality evidence and SNOWS appears to only consider the offsetting relating to the delivery of homes. Thus, the delivery of the economic growth strategy cannot yet be considered effective. Existing sites such as the Land at Lennox Wood, has an existing water supply and so can be enhanced to assist in the delivery of the economic growth strategy. However, given The Site's location and existing building, greater flexibility is required in Strategic Policy 30.
- 2.4. In respect of Strategic Policy 30, The Site has been identified as a Key Employment Site (amongst a number of others). It was not protected as a Key Employment Site within the adopted HDPF and thus, this change in designation should be evidenced. Paragraph 9.21 of the HDLP states:
- "This policy identifies and protects Key Employment Areas, which are identified on the Policies Map, and follows a review of existing employment locations to ensure that a range of employment sites remain available across the District."*
- 2.5. However, CTI has not been able to locate any assessment of the land at Lennox Wood. The Site has not been assessed as part the part of the Site Assessment Report (Chapter 4), nor the EGA 2020 or the SA. Therefore, the approach to the Key Employment Areas cannot be considered justified.
- 2.6. Notwithstanding this, CTI understand that The Site currently has some employment merit. It operates as a data centre with a small section that is operated by Bowers and Wilkins for Research & Development. The remainder of the site is associated car parking and a redundant overflow car park (thus – the site in entirety is previously developed). At present, the number of employees at the site is small (thus there is limited existing employment to safeguard). The job creation and retention does not appear to have been considered by HDC and instead there is a focus on employment floorspace only. Other potential land uses have not been considered, which can contribute to employment. This is an oversight.
- 2.7. Paragraph 9.20 sets out that for the purposes of the Strategic Policy 30, employment is office, industrial, storage and distribution uses that fall within B2, B8 and E(g) Use Classes with other uses that provide jobs defined as 'employment generating uses'. As such Key Employment Areas are restricted to B2, B8 and E(g) uses only. This is unlikely to be effective, in the case of Lennox Wood, to enable a positively planned mixed-use redevelopment of the Site (adjacent to the centre of Southwater, a key settlement in the hierarchy).

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- 2.8. Whilst CTI 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.
- 2.9. Unless there is an incentive for the Key Employment Areas to have flexible allocations to allow mixed use development to come forward, there is a high chance that the existing unsuitable employment floorspace in the District will remain as such. Consequently, this could result in the loss existing employment floorspace as they remain vacant and unsuitable for use. By allocating sites for mixed use development there is flexibility for developers to bring forward a suitable and viable proposal for the individual site.
- 2.10. The EGA 2020 confirms that supporting on-site facilities such as convenience retail, gyms and other supporting uses within business parks could be helpful in making these locations more attractive to the market and potential occupiers or supporting viability challenges where they exist. On this basis, a policy mechanism should be included as part of the policy to allow for other employment and non-employment facilities to be brought forward in the case that existing uses become unviable. This is fundamental given the current economic climate. It is therefore imperative that the employment land at Lennox Wood is allocated as a mixed use allocation, as opposed to solely being for employment use in order to make it deliverable.

AMENDMENT REQUIRED

CTI consider that the Land at Lennox Wood should be removed as a Key Employment Area unless the appropriate evidence can be provided to support the designation.

Strategic Policy 30 should also be amended to allow greater flexibility of uses to allow diversification within existing employment sites to maintain the required economic growth. It is recommended that part 3 of Strategic Policy 30 is amended as underlined below:

*3. Key Employment Areas, as listed in the table below and defined in the Policies Map, are protected for industrial, storage and distribution uses (B2, B8 and E(g)ii / iii Use Classes). **Other employment generating uses will be supported where they assist in the diversification of the employment site and meet the requirements of part 4 of this policy.***

3. Conclusion

- 3.1. This Examination Statement has been prepared by Savills on Royal and Sun Alliance Insurance Ltd c/o Columbia Threadneedle Investments (CTI) relation to Matter 7 of the HDC Local Plan Examination. These comments should be read in conjunction with the R19 Representations (reference ID: 1207741) that were submitted in March 2024.
- 3.2. CTI has raised concerns with the identification of the land at Lennox Wood as a Key Employment Area and lack of evidence supporting this new designation. It is requested that the designation is removed should no evidence be provided to support the designation.
- 3.3. In any event, it is recommended that Strategic Policy 30 is amended to allow for the diversification of the Key Employment Site to allow for employment generating uses in addition to industrial, storage and distribution uses (B2, B8 and E(g)ii / iii Use Classes). This allows sites that may no longer meet modern standards to continue to assist in the economic growth in the area whilst operating viably.
- 3.4. CTI has suggested amended policy wording to Strategic Policy 30 which should be incorporated into the HDLP prior to adoption.

Appendix A Glossary

GLOSSARY

HDC	Horsham District Council
HDPF	Horsham District Planning Framework 2015
HDLP	Horsham District Local Plan (Emerging Plan)
NPPF	National Planning Policy Framework
R18	Regulation 18
R19	Regulation 19
SA	Sustainability Assessment
SNOWS	Sussex North Offsetting Water Scheme
EGA	Economic Growth Assessment
CTI	Columbia Threadneedle Investments