



MATTER 7: ECONOMIC DEVELOPMENT (STRATEGIC POLICIES 29 & 30)

1 Introduction

- 1.1 This statement has been prepared on behalf of Our Place Sustainable Development Limited ('Our Place'). It follows the Inspector's Notes ID03 (Examination Guidance Note) and ID04 (Matters, Issues and Questions) and considers the soundness of the Submitted Regulation 19 Local Plan (SD01) as proposed to be modified by SD14 (v2).
- 1.2 As background, Our Place is both the landowner and the master developer for the proposed 150 ha Kingswood new settlement. Located close to Adversane¹ south of Billingshurst, it has the potential to deliver 2,850 homes, employment and town centre uses (providing 2,450 jobs)² with associated open space, schools, community facilities and infrastructure. Despite Our Place proactively engaging with the Council throughout the local plan process, having signed up to a planning performance agreement (PPA) and providing extensive evidence to demonstrate the unconstrained and deliverable nature of Kingswood, it has been unjustifiably omitted from the Local Plan³.
- 1.3 This Statement comments on the soundness of the plan and its evidence base following the questions posed by the Inspector in relation to this matter. Statements have been lodged in respect of other matters and, where appropriate, these are referenced in this Statement.

2 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 39: New Employment Sound?*

2.1 The policy is not sound and the approach is not justified.

Housing/Population Misalignment

- 2.2 There is a mis-alignment between employment allocations and housing growth. The Council's approach to employment does not appear to have been affected by the reduction in housing targets (and therefore future population) between the Regulation 18 and 19 Local Plans. Paragraph 9.10 of the Regulation 19 Submission Local Plan cites the Northern West Sussex Economic Growth Assessment (January 2020) 'EGA' and updates (November 2020) which pre-dated the reduction in housing targets between the two stages of the plan. Paragraph 2.2 (3) of the January 2020 EGA states that, amongst other things, that it was informed by the future growth of the local labour supply derived from the 2019 North Western Sussex Strategic Housing Market Assessment (SHMA) 2019. In turn the conclusions of that 2019 SHMA (paragraph 13.8) indicate that it was based on an OAN of 965 dph for Horsham, i.e. significantly

¹ Which it is often called in the Councils' evidence base (under reference SA597)

² Comprising circa 11,419 sq.m of office space, 3,000 sq.m of light industrial, 7,255 sq.m of retail floorspace and a hotel

³ Extensive representations on behalf of Our Place were submitted to both the Regulation 18 and 19 versions of the draft Plan (ref [SD13.1198209](#)).



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below the 777 dph now proposed in draft Strategic Policy 37. Increasing housing targets to meet (or exceed) the OAN would address such an inconsistency.

Approach to allocations

- 2.3 Those sites cited in 'Table 5: Existing Commitments' on page 106 of the Local Plan should be identified as allocations. The local plan acknowledges that the principle of development has been accepted (through the grant of planning permission) and the Local Plan proposes to allocate additional land on the basis that they will be delivered. Specifically allocating the sites for employment will ensure there is clarity about the future use of the sites.
- 2.4 This includes '**Land at Brinsbury College**' where table 5 acknowledges permission for 16,850 sq.m (flexible use B2,B2, E(g)) and this **should be listed in Table 6 of policy 29**. Appendix of the Economic Growth Assessment 2020 (Appendix 5) described that site as having '*Significant scope for future development linked to rural based sectors and/or the educational offer at the campus, to help support the future of the organisation. Largest site parcel (to east of railway line) subject to proposed new settlement so not available for employment use in its entirety*'. It is noted that, in comparison to the 16,850 sq.m of consented development at Brinsbury College, those sites which are specially allocated (EM1 to EM4) are significantly smaller, being between circa 3,000 and 9,000 sq.m.