

DMH Stallard – Representor number: 1192354

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?

Yes subject to the comments below it is 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?

Council will need to provide at least 40,730 sqm of B class floor space which extends up to a need for 260,855 sqm of B class floor space under the high growth alternative labour supply scenario over the plan period. This floorspace equates to 35.3 hectares of land for the baseline scenario, and 65.4 hectares under the high growth alternative. It is clear therefore that the Local Plan will need to allocate a significant amount of land for new B class floor space in the District.

From a review of the existing commitments set out in table 5 of Policy 29 it would appear that a total of 139,192 sqm of floorspace is to be provided.

With regard to this being justified and effective, it is our view that it requires further consideration especially to the allocation of additional sites in the south of the district for it to be effective. However, we are of the view that the objective to increase opportunities for all types of business to grow and expand by providing suitable accommodation via sites and locations is justified.

With regard to how clearly it is specified, we do think that consideration should be given to the wording to make it explicit that applications for employment use on those sites which are allocated for employment use or identified as an existing employment use in Neighbourhood Plans will be supported by the District Council.

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?

As above

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?

As stated above, we are of the view that the more consideration should be given to the wording to make it explicit that applications for employment use on those sites which are allocated for such use or identified as existing employment use in neighbourhood plans will be supported by the District Council.

We are of the view that there are sites that should be considered as a Key Employment Area that have not been, such as the Old Brickworks which has a sustainable location and direct access to the Strategic Road Network via the A281 which runs to the east of the site.

The plan has been supported by various employment reports, the most recent of which appears to be the Northern West Sussex Economic Growth Assessment (EGA), which was published in January 2020. The EGA which reviewed the existing operational employment sites in the District, including the proposed KEAs this found that there was a lack of sites which have a suitable access to accommodate large modern vehicles. It should be noted that The Old Brickworks site currently has a suitable access in situ, as highlighted above.

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?

We consider that the policy should be amended to include other 'appropriate sui generis uses' to provide a clearer and more well-rounded application to sites. We note that policy 30 states that Key Employment Areas "are protected for industrial, storage and distribution uses (B2, B8 and E(g)ii / iii Use Classes)." Policy 30 therefore identifies 'employment' as industrial, storage and distribution uses that fall within the above use classes.

b) Should criteria 1 also refer to intensification?

This would be a reasonable addition.

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

Not reasonable and should be removed.

justified, effective, consistent with national policy and positively prepared?

Q1. Is Policy 31: Rural Economic Development sound?

a) Is the geographical application of the policy or individual criterion clear? Is it clear whether proposals must comply with all criteria? How does criterion 2 relate to sites allocated in the Plan?

It is our view that the supporting text of policy 31 should define rural economic development, as it is currently considered to be unclear as to whether this policy relates to development/diversification of farms /farm estates only, or whether it would be applicable for economic development proposals in areas outside of the BUAB.

b) How has this policy taken into account allocations in Neighbourhood Plans?

Neither the supporting text nor the wording of policy 31 make it clear that employment sites allocated in adopted neighbourhood plans which are located in rural locations will be supported by the Council. As such it is our view that this policy needs to be amended to refer to those employment sites in the countryside which have been allocated in Neighbourhood Plans, and specifically state that in those cases proposals for new employment sites in rural areas which have been allocated in adopted neighbourhood plans will be supported.

**Horsham District Draft Local Plan: Reg. 19 Consultation Response by DMH Stallard on behalf of Sweeptech Environmental Services Ltd & Edburton Contractors Ltd.
Land at The Old Brickworks, and land to the north of The Old Brickworks, Shoreham Road, Henfield.**

DMH Stallard act on behalf of both Sweeptech Environmental Services Ltd & Edburton Contractors Ltd on planning matters in relation to their site at The Old Brickworks, and for the land to the north of The Old Brickworks, Shoreham Road, Henfield. Both of these sites front on to Shoreham Road, and are located between the settlements of Henfield and Small Dole. The site to the north of the Old Brickworks is approximately 2 hectares in area, and the site at The Old Brickworks is approximately 3 hectares in area.

We write in response to the Regulation 19 consultation version of the draft Local Plan, our comments relate to the proposed strategy and policies contained in Draft Local Plan, but also to provide site specific comments.

Chapter 3: Spatial Vision and Objectives

We note that the draft Local Plan sets out a number of spatial objectives which will help the Local Plan achieve its vision, Spatial Objective (1) seeks to deliver a balance between economic, social and environmental priorities. This is in accordance with the NPPF which seeks to ensure economic, social and environmental objectives are delivered in mutually supportive ways.

Spatial Objective 7 seeks to meet employment needs and create opportunities to foster economic growth.

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The draft Local Plan acknowledges that sustainable development extends to the delivery of employment needs is welcomed. At paragraph 3.4 & 9.7 of the HLP, it is noted that 40% of the District’s residents commute beyond the boundaries of the District, many of which work within the neighbouring authorities of Crawley and Mid Sussex. The draft Local Plan notes at para 9.7 that “A lack of business accommodation in the District may contribute to high out commuting rates.” This pattern of outwards commuting can lead to unsustainable patterns of movement and the draft Local Plan seeks to deliver a suite of employment sites which can deliver against the District’s employment needs, and identifies existing sites to be protected for employment use.

We note that part of the vision for the draft Local Plan to the year 2040 is to make Horsham District a place where there is a vibrant urban and rural economy, and there is a diverse and resilient range of business premises which provide high-quality growth and offer the chance of residents to work close to home. At para 3.22 it is noted that this will be achieved by supporting the retention and growth of existing employment land. We commend this approach.

It is our view that the Council is right to be concerned that without further employment growth a ‘dormitory district’ will be created, with more people travelling outside of the

district to work, and only returning during the evenings and weekends. There is a danger that if this occurs it will have an impact on the ability to support the current offerings within the towns and villages of the District. We are of the view that this is likely to take place without the creation of additional employment land and the improvement or redevelopment of existing sites such as those at the Old Brickworks.

Strategic Policy 2

This policy sets out the settlement hierarchy of the District, which is the current approach taken in the HDPF, this recognises that the District has a distinct settlement pattern. Each settlement is within one of the 6 categories of settlement based on its function and access to facilities and services. Horsham is defined as the ‘Main Town’, which is the top tier settlement, and other settlements are divided within the remaining 5 categories.

We note that Henfield is defined as a ‘Small Town and Larger Village’, the second category of settlement, which is defined as a settlement with a good range of services and facilities. We broadly support the settlement hierarchy approach taken by the Council, and the identification of Henfield as Small Town / Larger Village.

Strategic Policy 2 seeks to direct development (including redevelopment and conversions) to within Built-Up-Area Boundaries (BUABs), with a focus of Previously



Developed Land (PDL). Those areas outside of BUABs will be defined as ‘countryside’ where development will be more strictly controlled.

We note that the BUAB of Henfield does not include the land around The Old Brickworks.

Chapter 9 – Economic Development

We note that this part of the draft Local Plan identifies and seeks to address a number of issues, one being that “There needs to be opportunities for all types of businesses to grow, expand and change to meet modern business demands. This includes the expansion of existing well performing industrial and warehousing sites as appropriate to the site and location.” We fully support this objective.

We note that paragraph 9.6 of the supporting text in this chapter states that “In recent years, some existing businesses in the District have reported being unable to grow and expand locally due to a lack of suitable accommodation (including existing stock) to move into.” It is clear therefore that there is a need for existing sites to be able to expand and for the creation of new sites in order to address the lack of employment accommodation in the District.

Strategic Policy 29 – New Employment

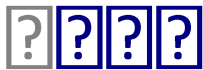
This policy allocates a number of new sites for employment use in the district (office, industrial, storage and distribution uses (B2, B8, E(g) use classes)). The draft Local Plan has been informed by various employment reports, the most recent of which is the Northern West Sussex Economic Growth Assessment (EGA), which was published in January 2020. This report advised that Horsham District “has recorded job growth over recent years, although the pace of growth has fallen behind regional and national rates. B use class jobs have also been declining within Horsham District, driven by job losses within manufacturing-based sectors in particular. The District now

accommodates the smallest stock of jobs within the NWS (Northern West Sussex)”.

This illustrates the need for Horsham to promote the district as a place for businesses to invest and grow their enterprises and the need for the Council to identify and allocate sufficient sites of varying scales to help accommodate various B use class businesses in the District.

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 40,730 sqm of B class floor space which extends up to a need for 260,855 sqm of B class floor space under the high growth alternative

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labour supply scenario over the plan period. This floorspace equates to 35.3 hectares of land for the baseline scenario, and 65.4 hectares under the high growth alternative. It is clear therefore that the Local Plan will need to allocate a significant amount of land for new B class floor space in the District.

Policy 29 sets out the existing employment site commitments which are due to come forward over the plan period and also allocates a total of 4 employment sites. From a review of the existing commitments set out in table 5 of Policy 29 it would appear that a total of 139,192 sqm of floorspace is to be provided, we also note that all of the existing commitments listed within table 5 are located in the north of the District. The allocations set out in policy 29 would provide a total of 28,000 sqm of employment floorspace, all of which are also located in the north of the District. The total amount of employment floorspace floorspace to be provided through allocations and commitments is below what is required as set out in the EGA. It is our view that further consideration should be given to the allocation of additional sites in the south of the District.

We note that land north of the Old Brickworks (SA681) has been excluded from having a full site assessment as part of the evidence base of the Reg 19 plan on the basis that it is an employment site which is already allocated in a development plan (in this case the Henfield Neighbourhood Plan). We also note that policy 29 of the draft Local Plan advises that economic growth will be supported through the provision of sufficient employment land and that this will be achieved by a number of measures set out in the policy, one of which is through supporting sustainable local economic growth through Neighbourhood Development Plans. Whilst we are supportive of this approach, however, we do think that consideration should be given to the wording to make it explicit that applications for employment use on those sites which are allocated for employment use or identified as an existing employment use in Neighbourhood Plans will be supported by the District Council.

Strategic Policy 30: Enhancing Existing Employment Sites

This policy relates to existing employment development, it states that in order to meet the employment needs of the District up to 2040, existing key employment sites will be safeguarded. The policy sets out the principles for development on Key Employment Areas and other existing employment sites in the District in order to protect their employment use and improve existing provision.

We are disappointed to note that the existing employment site of The Old Brickworks

has not been identified as a Key Employment Area (KEA) within this policy.

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It is our opinion that The Old Brickworks should be considered as a KEA. It has direct access to the Strategic Road Network via the A281 which runs to the east of the site, and it is sustainably located. The site is well utilised and provides a thriving employment site (in sui generis and B8 use) within the south of the District. As such we consider that this site is entirely appropriate as a KEA.

In terms of its sustainable location, there are bus stops along Shoreham Road which are in close proximity to the site and these provide services to Henfield, Horsham, Small Dole and Brighton. The site is located approximately 1.2km from Henfield and approximately 550m from Small Dole. The site is performing well and it provides additional employment opportunities in the south of the District.

The Site as shown in red below is currently occupied by Sweeptech Environmental Services Ltd, a well known and established waste recycling company (sui generis use class), and Edburton Contractors Ltd, a well known and long established local company in B8 use.



Image courtesy of Google Maps

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We note that policy 30 states that Key Employment Areas “are protected for industrial, storage and distribution uses (B2, B8 and E(g)ii / iii Use Classes).” Policy 30 therefore identifies ‘employment’ as industrial, storage and distribution uses that fall within the above use classes. We consider that the policy should be amended to include other ‘appropriate sui generis uses’.

It is our view that it would be completely logical to include this Site as a Key Employment Area. It is a well utilised site which is currently fully occupied by two established local businesses. It should also be noted that by including the Land at The Old Brickworks as an employment site would provide approximately 3 hectares of additional land which will be available for employment space, and this will help make a significant contribution to the need for commercial space in the District, particularly in the south.

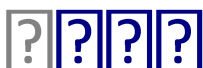
The draft Local Plan is supported by the Northern West Sussex Economic Growth Assessment 2020 (EGA), this jointly prepared evidence base identifies the employment needs of Crawley and Horsham. For Horsham, it is prepared with it in mind that the District wishes to encourage employment growth as a means to reduce outmigration of the workforce.

It should be noted that the Economic Growth Assessment reviewed the existing operational employment sites in the District, including the proposed KEAs this found that “In particular, the accessibility of some KEAs to modern large vehicles is limited” and that there is a need “to ensure that economic development in the District is not undermined by a lack of suitable space (sites and premises).

The EGA had therefore noted that there was a lack of sites which have a suitable access to accommodate large modern vehicles. It should be noted that The Old Brickworks site currently has a suitable access in situ, and would therefore address this concern had it been allocated as a KEA. On this point it should be noted that we provided representations during the previous consultation stage for the Local Plan (Issues & Options) in May 2018, and at this time we advised that The Old Brickworks is available now, it is free from any statutory designations, and that to include it as a key employment area would allow sufficient flexibility to help accommodate the additional employment needs of the District, particularly in the south of the District, and would make a significant and immediate contribution to the additional employment land required.

It does not appear that any assessment of this site has been undertaken as part of the background work on the draft Local Plan. It is our view that further information should be provided on how the potential sites have been eliminated as KEAs, and how

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boundaries of the KEA has been determined, and in this specific case why The Old Brickworks has not been included as a KEA. An overall KEA should be allocated to cover The Old Brickworks and the land to the north (allocated in the Neighbourhood Plan, along with the Henfield Business Park to the east) - more on this below.

Policy 31: Rural Economic Development

This policy refers to sites outside of BUABs or secondary settlements, and therefore is concerned with new employment development in the countryside. We note that the policy as currently worded is particularly farm and countryside focused, but seems to suggest that all new economic development in countryside areas will be subject to the policy.

It is our view that the supporting text of policy 31 should define rural economic development, as it is currently considered to be unclear as to whether this policy relates to development/diversification of farms /farm estates only, or whether it would be applicable for economic development proposals in areas outside of the BUAB.

The site north of The Old Brickworks and The Old Brickworks are located outside of the BUAB of Henfield and as such development on these sites may be subject to Policy 31, however the policy as currently worded does not make clear. We consider that further consideration should be given to the wording of this policy to clarify which sites this policy would apply to.

We note that the supporting text at paragraphs 9.29 - 9.30 advises that “There is an ongoing need to maintain and enhance the rural economy.” and “Neighbourhood Planning should also play an important role in identifying and promoting sustainable economic growth at the local level.” However, neither the supporting text nor the wording of policy 31 make it clear that employment sites allocated in adopted neighbourhood plans which are located in rural locations will be supported by the Council. As such it is our view that this policy needs to be amended to refer to those employment sites in the countryside which have been allocated in Neighbourhood Plans, and specifically state that in those cases proposals for new employment sites in rural areas which have been allocated in adopted neighbourhood plans will be supported.

Henfield Neighbourhood Plan

It should be noted that the Henfield Neighbourhood Plan has identified The Old Brickworks as an existing employment site, and land to the north of the Old Brickworks is allocated as a new employment allocation. The Henfield Neighbourhood Plan (HNP) which was formally ‘made’ by Horsham District Council in June 2021. The extent of the sites are shown in the HNP policies map below:



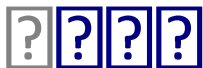
Land north of The Old Brickworks (Site F) and The Old Brickworks site - Image taken from HNP

The Henfield Neighbourhood Plan identifies 3 existing employment sites, and allocates 3 new employment sites, one of which (site G) has now been developed and partially built out.

It should be noted that the NP sets out the objectives of the Parish and reflects the wishes and views of the local community.

The Old Brickworks; Hollands Lane Industrial Site; and Henfield Business Park are all identified as existing employment sites in the Neighbourhood Plan. The latter is proposed as a KEA in the draft Local Plan, however, no other KEA sites in Henfield are proposed in the draft Local Plan. It is our view that The Old Brickworks should be identified as a KEA in the Local Plan. Furthermore, given the number of existing and allocated employment sites identified in the same area, it is our view that there is merit to identifying and allocating this area as a major employment site/ Key Employment Area in the Local Plan, and that the LPA should give due consideration to this suggestion.

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The Old Brickworks is identified as an existing employment site within in HNP which is a 'made' plan and forms part of the development plan for the village, it should be noted

that the whole of the site (including the southern part of the site) is identified within the blue line (as shown in image from HNP above) as employment land. As such, for completeness and consistency it is our view that this site as it is identified and outlined in the HNP should be included in the District Local Plan as a KEA. We are concerned that as currently drafted the omission of the site will result in a policy conflict between the HNP and the Local Plan, and as such request that the latter be amended to include this site as a KEA.

In addition, the land north of The Old Brickworks is allocated for employment use in the Henfield Neighbourhood Plan (Site F) in above image. This designation has established the acceptability of the principle of new employment development on this site.

However, again, for completeness it is our view that policies 30 & 31 should be amended to specifically state that in such instances when planning applications come forward for employment uses on sites which have been identified or allocated for employment it will be supported by HDC. We are concerned that as currently drafted there is a potential for a policy conflict between the HNP and the Local Plan, and as such request that the latter be amended to rectify this inconsistency.

It is our view that in order to avoid any potential conflict between the policies contained in the HNP and the Local Plan, and for clarification on rural sites, amendments should be made to the draft District Local Plan comprising:

- The identification of The Old Brickworks as a KEA
- Consideration of identifying the cluster of existing and allocated employment sites on this part of Shoreham Road as a KEA/Major employment area
- Amend the wording to include appropriate sui generis uses as employment in Policy 29
- Wording to both Policies 30 & 31 which confirms that applications on sites which are identified as existing employment sites or sites which have been allocated for employment use within Neighbourhood Plans will be supported by HDC
- Clarification regarding the sites which policy 31 would be applicable.

Conclusion

We consider that the existing employment site at The Old Brickworks should be identified as a KEA. This is an existing established employment site, which has been identified as such in the HNP, and it is our view that it would be completely logical to include this Site as a Key Employment Area. It is a well utilised site which is currently fully occupied by two established local businesses. It should also be noted that by including this site approximately 3 hectares of additional land will be available for



employment space, and this will help make a significant contribution to the need for commercial space in the District, particularly in the south.

It should be noted that land north of The Old Brickworks has been allocated as potential employment site, and land at The Old Brickworks (including the southern part of this site) has been identified as an existing employment site within the Henfield Neighbourhood Plan. However, the wording of policy 29 does not currently make it clear that planning applications which would come forward on such sites would be supported by HDC, and as such we consider that the policy should be amended to make the intention of this policy clear.

As a related point, we think it would be helpful to all users of the draft Local Plan and future versions of the Local Plan if the NP allocations were included on the Local Plan Proposals Maps. We would also suggest that the start of the Local Plan should include a list of made NPs and advise that land allocated in those NPs are included on the proposals Map, but also note that additional alterations may be necessary when made as part of a NP review.

Yours sincerely



Lisa Da Silva
Associate Planner
For and on behalf of DMH Stallard LLP