

SUBMISSION ADUR LOCAL PLAN 2016

EMPLOYMENT TOPIC PAPER

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1. Introduction

- 1.1 This topic paper aims to provide a clear explanation for the approach to employment provision in the Adur Local Plan. It sets out the local economic context, key findings of the Employment Land Review 2014 and the forecasting methodology undertaken, and how the Local Plan intends to try and meet the employment needs of Adur through new allocations and protecting existing employment floorspace. This topic paper also shows how the approach to employment provision and protection meets the requirements of the National Planning Policy Framework and Planning Practice Guidance.
- 1.2 The Council considers that its approach to providing new employment floorspace and protecting existing employment floorspace in the Adur Local Plan meets the soundness tests set out in the National Planning Policy Framework (para 182) for local plan preparation in that:
- The Plan has been **positively prepared** and has tried to meet objectively assessed requirements for employment floorspace as far as it is reasonable to do so and is consistent with achieving sustainable development in Adur.
 - The Plan is **justified** in the amount of employment floorspace being proposed in the Plan and in the protection of employment floorspace in the district.
 - The strategy is **effective** and deliverable over the Local Plan period.
 - The Plan is **consistent with national policy** and will enable the delivery of new employment floorspace and the protection of key existing employment floorspace in accordance with the National Planning Policy Framework.

2. The Adur Local Plan area

- 2.1 Adur District is located on the coast between Brighton & Hove City to the east and Worthing Borough to the west. The northern part of the district is located within the South Downs National Park and to the south is the English Channel, with the low lying land of the Adur Valley separating the settlements of Lancing and Sompting to the west from Shoreham-By-Sea, Southwick and Fishersgate to the east.
- 2.2 It should be noted that this Local Plan does not address that part of Adur which lies within the National Park – this area will be covered by the emerging South Downs Local Plan.

3. National Planning Policy Framework

- 3.1 The NPPF states, amongst other things, the following in regard to Local Plans and the economy:

- Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:
 - Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
 - Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - Support existing business sectors;
 - Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
 - Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.

- Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

4. National Planning Policy Guidance (NPPG)

4.1 The NPPG includes the following statements:

- Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area.¹

- In understanding the current market in relation to economic and main town centre uses, plan makers should liaise closely with the business community to understand their current and potential future requirements. Plan makers should also consider:
 - The recent pattern of employment land supply and loss to other uses
 - Market intelligence
 - Market signals
 - Public information on employment land and premises required
 - The existing stock of employment land
 - The locational and premises requirements of particular types of business

¹ Para 018 of the NPPG

- Identification of oversupply and evidence of market failure²
- In terms of forecasting economic future trends, Plan makers should consider:
 - Sectoral and employment forecasts and projections (labour demand)
 - Demographically derived assessments of future employment needs (labour supply techniques)
 - Analyses based on the past take-up of employment land and property and/or future property market requirements
 - Consultation with relevant organisations, studies of business trends, and monitoring of business, economic and employment statistics.³

5. Strategic Economic Plan

- 5.1 The Strategic Economic Plan 2014 (SEP) for the Coast to Capital LEP sets out ambitions for sustainable economic growth; investments and proposals for realising these ambitions; the proposed Growth Deal with Government; and the Local Growth Fund Investment required to 2020/21. The vision of the LEP is to 'deliver exceptional growth and productivity gains to deliver economic performance to rival the best in Europe and the rest of the world'. The SEP sets out a 6 year programme of investment in business critical infrastructure including, amongst other things, transport and flood defences with the aim of creating 60,000 new jobs, 26,000 new homes and 970,000sqm of new employment floorspace in the region.
- 5.2 The SEP identifies the Shoreham area as one of the strategic locations for growth. It builds on the Greater Brighton City Deal and links the delivery of employment growth and new housing across Shoreham Harbour, Shoreham Airport and linked strategic housing allocations in this Local Plan. The SEP recognises the flood risk and transport constraints in delivering housing and employment growth and its bid to Government for funding focussed on addressing the funding gap that currently exists in delivering flood defences for the River Adur (Shoreham Adur Tidal Walls) and for Shoreham Harbour (on the Western Harbour Arm).

6. Submission Adur Local Plan 2016

- 6.1 The following vision and objectives in the Local Plan set out the aims of the Council to provide new employment and improve Adur's economy:

V1: Regeneration benefits for Adur will have been secured, and residents will enjoy an improved quality of life and wellbeing through better access to higher quality jobs, better choice in housing including

² Para 030 of the NPPG

³ Paragraph 032 of the NPPG

affordable⁴ homes and new and improved local services, community infrastructure, and environmental quality. Inequalities between different parts of Adur will be reduced, uplifting the most disadvantaged neighbourhoods.

V2: Most development will have been focussed around Adur's main communities - Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate, and measures will have been taken to reduce their impact on the environment. Whilst many of Adur's residents will continue to visit Worthing, Brighton and other centres for employment and some retail and leisure functions, Adur and its town and village centres will continue to have an important role in providing retail, employment, leisure and community facilities, whilst also acting as a destination for visitors. Sompting village will have retained its rural village character.

V3: Through new development at Shoreham Harbour, Shoreham Airport and New Monks Farm, new opportunities for employment will have been created to benefit the economic prosperity of Adur-as well as the wider sub-region. Training opportunities will be supported, where appropriate.

V4: Much of the regeneration of Shoreham Harbour will have been delivered, achieving a mix of residential, employment, community, leisure and retail development, and affordable housing. The regeneration work will also have provided an opportunity for consolidating, reconfiguring and enhancing activities of the Port of Shoreham, which will continue to play a vital role in the local economy. Relocation of some commercial uses will have resulted in a more attractive urban environment and an improved interface between the Harbour and the rest of Adur.

V11: Development which meets the economic, social and environmental objectives of this plan will have been supported. Change will have been managed through an ambitious yet achievable planning framework (and associated Infrastructure Delivery Plan) which reflects the proposals and priorities of key stakeholders, local authorities and others, and monitored to assess its effectiveness in delivering development and associated infrastructure. This will involve working in partnership, and across boundaries, as necessary.

O2: To ensure that local communities will benefit from regeneration through physical and social integration, and the provision of new homes (including affordable housing) which meet identified needs, employment opportunities, social and community facilities, leisure and transport facilities (including sustainable travel measures).

⁴ The National Planning Policy Framework defines affordable housing; this definition will be used – see Glossary.

O3: To regenerate Adur through ensuring a range of employment opportunities and through new sustainable development opportunities. In particular, regeneration will seek to:

(a) Achieve strategic development at Shoreham Harbour, delivering housing and jobs; creating social, economic, environmental and infrastructure improvements which benefit Adur, its businesses, residents and visitors and contribute to the prosperity of the wider sub-region.

(b) Increase the role of Shoreham Airport in the local economy and wider area, through the provision of increased employment opportunities, enhancement of its role as an important visitor attraction, and its continued importance as a General Aviation Airport.

(c) Achieve strategic development at New Monks Farm, delivering housing and jobs and creating social, economic and infrastructure improvements.

6.2 Policies 4 and 26 of the Adur Local Plan help to deliver the vision and objectives.

Policy 4: Planning for Economic Growth

To facilitate regeneration and ensure a sustainable economy, a total of approximately 41,000 square metres of land will be allocated for appropriate employment generating uses in Adur up to 2031 at the following locations:

- Shoreham Airport (approximately 15,000sqm)
- New Monks Farm (approximately 10,000sqm)
- Shoreham Harbour Regeneration Area (approximately 16,000sqm within Adur)

These allocations will provide a range of employment sites in terms of locations and sizes, and provision will be made within these allocations for a range of accommodation types.

Further economic development at the site to the north of the airport, currently occupied by Ricardo, will be supported subject to other policies in this Plan.

In addition to the above provision, additional employment floorspace will also be achieved through redevelopment, intensification, change of use to employment, and provision of new employment sites. The majority of this floorspace will be provided within the town centres and the main existing employment areas.

Outside of designated employment areas, where new development for, or extensions to B1, B2 and B8 uses is proposed, such applications will

only be permitted where it is demonstrated they will not have an unacceptable impact on adjacent residential properties and they comply with other policies in this Plan.

Criteria for the identification and provision of new employment floorspace will include the need to provide a variety of new business premises including small and medium sized premises; the need to meet the modern needs of businesses in terms of floorspace, security, quality of environment, good access and services, and ensuring there are no conflicts with neighbouring uses.

Policy 26: Protecting and Enhancing Existing Employment Sites and Premises

Where planning permission is required, proposed conversions to uses other than employment (B1, B2 and B8 of the Use Classes Order) in the following employment sites will be resisted:

1. Lancing Business Park
2. Shoreham Airport
3. Dolphin Road Industrial Estate, Shoreham-by-Sea

For sites not listed above, the conversion or redevelopment of land or buildings, currently or last in class B1, B2 or B8, for other uses will only be approved where:

- (i) The loss of a small proportion of employment floorspace would lead to a significant upgrade of the remaining employment floorspace.
- (ii) It can be satisfactorily demonstrated that the site or premises is/are genuinely redundant and that no effective demand exists or is likely to exist in the future to use the land or buildings of B class uses. This should include the length of time the property has remained vacant, the attempts made to sell/let it and the demand for the size and type of employment premises in the area.

Where part (ii) of the above criteria has been satisfied, a mix of uses will be considered. Employment generating uses should be considered as part of this mix of uses. Complete loss of employment uses will only be acceptable where it has been demonstrated to the satisfaction of the Local Planning Authority that partial employment use cannot realistically be achieved.

The upgrading of existing employment sites and buildings will be supported.

7. Adur's Economy

- 7.1 Adur's economy is closely related to those of Brighton & Hove and Worthing. Just under 44%⁵ of working residents in Adur actually work within Adur district. Between 2010-2011 there was net daily out commuting of 1294 people from the district to Worthing and 3538 to Brighton & Hove,⁶ reflecting the area's close proximity to larger employment centres. Job densities in the district are low - as of 2012, Adur had a job density of 0.63 (a ratio of jobs to population of working age) which is significantly below the national figure of 0.81.⁷ Therefore there is a need for more employment land to be provided in Adur to help redress this balance.
- 7.2 The public services sector provides the largest number of jobs in Adur (24% of jobs). This includes local government, education, health, defence and policing. Other large sectors in Adur, in terms of total employment, include wholesale and retail (22%), financial and other business services (17%), and manufacturing (13%). In comparison to West Sussex, the South East and the rest of the UK, Adur's strongest sectors are extraction and mining, manufacturing and construction.⁸
- 7.3 Relative to the wider sub-region (Brighton-Adur-Worthing) and the South East as a whole, a high proportion of commercial floorspace in Adur is industrial (41% compared to 30% across West Sussex and 28% across the South East). A third of industrial floorspace in the Adur-Brighton-Worthing area falls within Adur District compared to 25% of warehouse floorspace and just 6% of office floorspace. There is a relatively low level of office floorspace in the District, which makes up 10% of commercial floorspace compared to 25% across the Adur-Brighton-Worthing area and 20% across the South East.⁹
- 7.4 In commercial terms, Adur is primarily an industrial location (for industrial and warehouse floorspace) and does not currently have a particularly well developed office market, influenced partly by its proximity to Brighton which is an established office centre.¹⁰ Although the manufacturing sector in Adur has been performing relatively well, traditional manufacturing across the region has generally been in decline in recent years and this trend is set to continue. Therefore, it is important that a range of employment land and premises are provided in Adur to help strengthen the economy.
- 7.5 The recent economic downturn has not had a significant impact on Adur's economy. Although the number of jobs declined by approximately 400 during

⁵ This figure includes those that work in the Adur District (23.6%), those that work from home (10.3%), and those that have no fixed place of work (10.2%).

⁶ Annual Population Survey.

⁷ NOMIS.

⁸ Experian 2013.

⁹ Adur Employment Land Review 2014.

¹⁰ Adur Employment Land Review 2014.

the recession (2008-2009), the district has since recovered and job numbers are back to pre-recession rates (approximately 22,000 jobs).¹¹

8. Adur Employment Land Review 2014

Forecasting future economic demand

- 8.1 One of the main purposes of the Adur Employment Land Review (ELR) was to forecast future economic demand in Adur and use these forecasts to ascertain the amount of employment floorspace that should be provided in Adur up to 2031 to meet this demand.
- 8.2 To assess future economic demand, Experian employment forecasts were used. This method forecasts future growth in employment taking account of past growth in employment by sector and expected future performance of different sectors of the economy. There are limitations with this approach however as the economic forecasts assume that the different sectors in the district's economy will perform as well as they have in the past in comparison to the region / UK. At a local authority level there are a range of factors which may mean that these trends do not hold true including the impact of individual business investment / disinvestment decisions. Experian forecast do not take into account capacity or local demand.
- 8.3 The Experian Forecasts suggest a total net growth of 5,200 jobs in Adur between 2011 and 2031. The ELR noted that this forecast feels optimistic set against both past performance of the District's economy and the level of growth in labour supply which might be expected. Therefore they undertook a 'sense-check' of these forecast figures (see below).
- 8.4 The number of jobs forecast up to 2031 in B Class Uses was converted into employment floorspace. The Experian jobs forecast translates into the following B-class floorspace figures up to 2031:
- B1a/b Office & R&D: 19,466sqm
B1c/B2 Industrial: -10,919sqm
B8 Warehouse & Distribution: 39,093sqm
Sui Generis uses on employment sites: 19,522sqm
- 8.5 In order to 'sense check' the Experian figures, an additional demand scenario was modelled based on projecting forward past net trends in employment floorspace in Adur drawing on data on industrial and office floorspace as provided by West Sussex County Council and set out in Adur District Council's Annual Monitoring Reports (AMR) from 2004-2013. Projecting forward 20 years, based on the last ten years employment provision in Adur, the figures are as follows:

¹¹ Adur Employment Land Review 2014.

Net	5 Year Average (sq m)	10 Year Average (sq m)	20 Year Based on last 5 Years	20 Year Based on last 9 Years
B1a/b: Office & R&D	49	822	972	16,433
B1c/B2: Industrial	841	1,838	16,828	36,764
B8: Warehouse & Distribution	537	2,171	10,732	43,416
Sui Generis Uses on Employment Sites	-	-	-	-
Total	1,427	4,831	28,532	96,613

- 8.6 Based on the last 5 years, the trend based projections show a significantly lower level of demand for B1a/b office and R&D accommodation than the Experian forecasts. However, based on the last 9 years, the figures generally indicate that the Experian forecasts are suitable for use with regard to B1a/b: Office & R&D and B8: Warehouse & Distribution uses. However, there is an anomaly regarding B1c/B2 industrial floorspace as the additional demand scenario drawing on West Sussex County Council data shows a much higher projection than the Experian projection. However, it should be noted that the AMRs show a slowing of demand for B1c/B2 floorspace. The study considers that it can probably therefore be assumed that the Experian forecasts are perhaps a more realistic assessment of future need than one based on past development trends.
- 8.7 The study goes on to identify a range in terms of office and warehouse floorspace need. The office range is 15,000sqm to 20,000sqm and the warehouse range is 35,000 to 40,000sqm. See the table below from the ELR 2014:

Sq.m GEA		Office (B1a/b)	Industrial (B1c/B2)	Warehouse (B8)	Sui Generis	Total
Identified Need	Low	15,000		35,000		60,000
	High	20,000	-10,000	40,000	20,000	70,000
Relocations from Shoreham Harbour				18,750		18750
Completions 2011-13		138	953	0	0	1091
Vacant Floorspace, 2014		9984		20,075		30059

		1,586	-1,207	0	379
Sites with Planning Permission, 2014					
Future Requirement	Low	3,292	43,929		47221
	High	8,292	48,929		57221

8.8 This table shows that once completions from the 2011-13 monitoring years, vacant floorspace and sites with planning permission have been subtracted, and relocations from Shoreham Harbour added on, the requirement for B class floorspace over the plan period is as follows:

B1a/b: 3,292 – 8,292sqm

B1c/B2, B8 and Sui Generis: 43,929 – 48,929sqm

8.9 However, the ELR recognises that there is always going to be a certain level of vacant floorspace in any properly functioning commercial market. As a result, the ELR recommends that the Local Plan should make provision for the following scale of change in employment floorspace (in net terms) over the 2011-31 period:

B1a/b (Office and Research and Development): Demand for an additional **15,000 to 20,000 sqm net;**

B8 (Warehouse): Demand for an additional **35,000 to 40,000 sqm net.**

Linking forecast economic demand to housing provision

8.10 The ELR goes on to link the Experian projections to the level of housing provision proposed in the Adur Local Plan. Using GL Hearn's Autumn 2013 demographic projections¹² and the level of housing provision proposed in the Revised Draft Adur District Local Plan 2013 (which was the current Plan at the time of the production of the ELR), it is estimated that the labour supply within the district will increase by around 700-800 persons (2.6%) between 2011-31.

8.11 The Experian economic forecasts indicate a net growth in employment of 5,200 jobs between 2011-31. GL Hearn consider that the Experian forecasts are likely to over-estimate economic growth potential over this period. A notable proportion of employment growth is forecast in sectors where population growth is expected to be a demand driver. Therefore population growth is expected to be notably lower than assumed in the Experian econometric model.

8.12 However, looking more widely at economic growth potential, the close labour market interactions between Adur District and both Brighton and Hove and Worthing should be considered. There is a net out-commuting from Adur of

¹² Updated Demographic Projections for Sussex Coast HMA Authorities (August 2013) – GL Hearn

just under 7,200 persons daily which suggests there is some potential for economic growth to be supported by changing commuting dynamics, particularly considering the constrained supply of land for development in both Brighton & Hove and Worthing.

- 8.13 On the basis of the available evidence, GL Hearn suggest that the potential growth in jobs in the district is likely to be above the growth in labour supply of around 700-800 persons indicated over this period and thus there is likely to be some reduction in net out-commuting. However, it is probably appropriate to regard the Experian figures for growth of 5,200 jobs between 2011-31 as optimistic and it is expected that employment growth would be more moderate. GL Hearn estimate that employment growth of between 2000 and 4000 jobs (2011-31) is more likely.

Employment Land Site surveys

- 8.14 As part of the Employment Land Review 2014, all of the employment areas within the Local Plan area were surveyed. Despite the majority of sites being assessed as just average in terms of quality, the ELR considered that, other than Shoreham Harbour, there was no quantitative case for the release of employment land for other uses. However, it did identify a particular need for high quality sites to meet market demand.

9. Strategic Allocations

- 9.1 Given the constrained nature of the Local Plan area due to its location between the sea and the South Downs National Park, and the need to meet objectively assessed housing needs as far as is possible, there is not a significant amount of land available within the Local Plan area to meet the district's projected employment needs over the Plan period. Also, as described above, the Experian projections are likely to be optimistic. However, the following three sites have been allocated to help meet employment needs as far as is possible:

Shoreham Airport (Policy 7)

- 9.2 This is an existing employment area and functioning airport located in the Shoreham/Lancing gap. It is a particularly sensitive location within the countryside, identified in the Adur Landscape and Ecology Study¹³ as having a high overall landscape sensitivity. As a result, a maximum of 15,000sqm of floorspace has been allocated in the Adur Local Plan to be comprised of new appropriate employment generating floorspace (both aviation and non-aviation related), including a mix of B1 (business), B2 (general industry) and B8 (storage)/hangar uses. It is considered that this level of development balances the need to provide further employment floorspace in a high quality location with the need to protect the landscape and character of the district.

¹³ Landscape and Ecological Surveys of Key Sites Within the Adur District (2012) – Sheils Flynn

- 9.3 The ELR describes the airport as a ‘potentially attractive location for further employment development, and one of the few locations within the district which offers the potential to attract higher value-added activities, building on the existing business cluster and key high profile employers such as Ricardo.’
- 9.4 Therefore, due to limited opportunities elsewhere and the fact that the airport is an existing successful employment area, a carefully located allocation is proposed at the airport despite its environmental sensitivities. The policy for Shoreham Airport aims to ensure that a number of safeguards are in place to minimise the impact of development on the environment.

Shoreham Harbour (Policy 8)

- 9.5 As part of the regeneration of this area, a mix of uses are proposed including 16,000sqm of employment generating uses. Given that much of the proposed development at Shoreham Harbour will be residential, compatible employment i.e. B1 and appropriate A1 uses, will constitute the majority of new employment generating uses delivered at the Harbour. This site is treated as a broad location in the Adur Local Plan and more detailed proposals for the Harbour area will be included in the Shoreham Harbour Joint Area Action Plan.

New Monks Farm (Policy 5)

- 9.6 As part of a mixed use allocation, 10,000sqm floorspace for appropriate employment generating uses is proposed at New Monks Farm. The ELR states that ‘from a commercial perspective, employment development at this location is likely to be less attractive than at Shoreham Airport where there is an existing cluster of employment activity and major employers, including Ricardo. This might be a consideration in regard to phasing and in regard to the form and mix of employment provision, were both schemes to progress. However, there might be opportunities to provide local services and public transport close to employment development as part of the planning of a comprehensive mixed-use scheme at New Monks Farm.’

10. Employment Generating Uses

- 10.1 The generic term ‘employment generating uses’ has been used for all three employment sites listed above to enable some flexibility in relation to the employment uses provided. Although B1a/b uses are generally preferred taking account of the findings of the ELR, Adur is still not a recognised office location and doesn’t have a significant office market and it would be unrealistic to assume that the majority of the allocated floorspace will be developed for B1a/b uses. The ELR also identifies a significant demand for B8 uses. However, B8 uses are unlikely to be appropriate at New Monks Farm and Shoreham Harbour given that there will be residential uses adjacent and New Monks Farm lies within a relatively sensitive landscape. Although the airport policy allows for some B8 uses, it is highly unlikely that Adur will meet the demand for B8 floorspace over the plan period. Whether the Plan

can meet the demand for 10,000 – 15,000sqm of B1 office floorspace is uncertain at this stage and will depend on the demand locally for B1 uses over the Plan period. The amount of office floorspace provided during the Plan period will be monitored through the Council's Annual Monitoring Report.

11. Protection of Employment Sites

11.1 Whilst it is noted that new permitted rights introduced by the Government allow offices to be converted to residential uses, it is considered that there a number of key employment sites in the district which should be protected. Therefore, where planning permission is required, non B-class uses will not be permitted at the following sites:

1. Lancing Business Park¹⁴
2. Shoreham Airport
3. Dolphin Road Industrial Estate, Shoreham-By-Sea

11.2 These three sites have been specifically selected for protection as they are the largest employment areas in Adur and are successful and well-functioning with low vacancy levels. They are particularly significant for Adur's economy and their loss would have a negative impact on the number and range of jobs within the district and would be likely to increase out-commuting. These three sites are also recognised in the ELR as being particularly important for Adur in that they are home to a number of successful businesses and have few vacant units.

11.3 All other employment sites/uses in the Local Plan area are also protected but the policy allows for some flexibility regarding change of use where it can be demonstrated that such a use is genuinely redundant. It is considered that this approach for Policy 26 complies with the NPPF which states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

12. Duty to Co-operate

12.1 Employment provision is a particularly complicated issue with regard to the Duty to Co-operate. Adur has limited capacity to meet its forecast employment needs but such forecasts do not take account of local demand and also do not take account of the fact that Adur is also unlikely to meet its full objectively assessed housing need, again due to limited capacity. If, as is likely, the full objectively assessed need for housing is not delivered in Adur itself, the emerging Adur Local Plan is likely to provide more jobs than the growth in labour supply over the Plan period due to the amount of housing proposed to be delivered in the Local Plan area over the Plan period. Therefore, any shortfall in provision of employment floorspace over this period

¹⁴ Lancing Business Park is a Business Improvement District

(as measured against the employment demand projections in the ELR) is likely to be more theoretical than actual. Nevertheless, neighbouring authorities have been made aware of Adur's theoretical employment shortfall but this issue is best addressed sub-regionally through the Coastal West Sussex and Greater Brighton Local Strategic Statement (see the Adur Duty to Cooperate Statement 2016).

13. Summary

- 13.1 The approach to employment floorspace provision in the Plan, as set out in Policy 4, is considered positive, in accordance with the NPPF, but is also realistic in reflecting the limited capacity of Adur to accommodate new development without significant environmental impacts. Although the 41,000sqm of employment generating floorspace allocated in the Plan would not meet Adur's full forecast demand as set out above, it is likely to provide more jobs than the growth in labour supply in Adur over the Plan period and could therefore help to reduce the existing jobs deficit in the district as well as out-commuting.
- 13.2 Policy 26 of the Local Plan seeks to protect employment floorspace in Adur but is considered to provide enough flexibility to avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose, in accordance with the NPPF. Therefore, the approach to the Local Plan is considered to be flexible and realistic.