

Horsham District Local Plan Examination: Inspector's Matters and Issues

Crawley Borough Council Hearing Statement

April 2026

Matter 4: Business and industrial needs

a. Whether the plan makes sufficient provision for business, industrial and logistics needs

- 1.1 Crawley Borough Council (CBC) submitted formal representations (Response #1194005 [Crawley Borough Council Response - Horsham District Local Plan 2023 - 2040 \(Regulation 19\)](#)) to the submission draft Horsham District Local Plan (HDLP) Regulation 19 consultation on 1 March 2024.
- 1.2 That response, which followed issue of the Crawley Borough Local Plan Inspectors' Post-Hearings Letter, anticipated Crawley being able to meet its employment land needs for the Plan period to 2040 in full. On this basis, CBC did not anticipate there being unmet employment need arising from Crawley over the Plan period that it would be asking Horsham to assist with.
- 1.3 This position is reflected in the Statement of Common Ground (SoCG) between CBC and HDC (HDC Examination Document Reference Number: DC04) at Paragraphs 5.5 and 5.7.
- 1.4 The comments made at that point remain standing. This Hearing Statement seeks only to provide factual updates on progress since then, clarifying the Crawley employment land supply position following adoption of the CBLP.

Crawley Borough Local Plan

- 1.5 The [Crawley Borough Local Plan 2023 to 2040](#) (the 'CBLP') was adopted by Full Council on 16 October 2024. Through Strategic Policies EC1 (Sustainable Economic Growth) and EC4 (Strategic Employment Location), the CBLP sets the framework to meet Crawley's employment land requirements for the Plan period 2023 to 2040 in full.
- 1.6 The CBLP approach to employment has been informed by the shared evidence of the [Northern West Sussex Economic Growth Assessment January 2020](#) (HDC Examination Document Reference Number: EC02). The respective local planning authorities have since undertaken focused updates to this document for their administrative areas. The relevant update for CBC is the [Northern West Sussex Economic Growth Assessment Supplementary Update for Crawley \(January 2023\)](#).
- 1.7 CBLP Strategic Policy EC1 sets an overall requirement for 26.2ha new business land in Crawley over the Plan period to 2040. It is based on a 'labour demand' (forecast of job growth) approach, prepared using the Experian 2022 (Q4) forecast from the Northern West Sussex Economic Growth Assessment Supplementary Update for Crawley (January 2023).
- 1.8 Policy EC1, taking account of Crawley's existing commitments, confirms a requirement for a minimum 17.93ha new business land, principally within the B8 storage and distribution sector. This requirement is met in full through Strategic Policy EC4, which allocates Land east of Balcombe Road and south of the M23 spur (referred to as Gatwick Green) for the comprehensive development of a Strategic Employment Location.
- 1.9 The Gatwick Green allocation (44ha) has a developable area of 30ha, with the remaining land reflecting that landscaping, buffers and supporting infrastructure will be required. Its 30ha developable area is greater than the minimum 17.93ha need identified in the Crawley Local Plan. This responds to National Planning Policy Framework (NPPF) 2024 requirements for flexibility, with the additional headroom (circa 12ha) providing scope for

the Gatwick Green allocation to accommodate wider demands in response to market signals for logistics, and factor in some job growth that could arise from urban extensions to Crawley.

- 1.10 This flexibility is discussed at Paragraph 131 of the [Inspectors' Report on the Crawley Borough Local Plan](#), which sets out: "...the 26.2ha employment land requirement in the submitted Plan should be treated as a firm minimum, so as to potentially provide some flexibility to meet employment needs which may arise and to do so as part of a wider pattern of sustainable growth 'At Crawley'".
- 1.11 Paragraph 147 of the Inspectors' Report clarifies (in relation to Strategic Policy EC4) "This would ensure the policy is effective in light of market signals evidence of a stronger demand for logistics and warehouse development above the jobs demand forecast used and providing headroom for any jobs demand arising from planned housing growth immediately adjacent to Crawley".

Alternative Employment Forecasts

- 1.12 Alternative employment forecasts, discussed further at 5.3 of the SoCG between CBC and HDC (HDC Examination Document Reference Number: DC04), were considered and examined through the Crawley Local Plan process. This included consideration of a labour-supply (housing growth) derived scenario, based on the CBLP supply-led housing figure of 314 dwellings per annum. This generated an employment land requirement of 26.1ha, closely aligning with the 26.2ha business land requirement set out in Strategic Policy EC1.
- 1.13 A Labour Supply scenario based on housing delivery of 544dpa was considered. This factored in the possibility of increased housing delivery through urban extensions coming forward immediately to the west and east of Crawley, generating a higher employment requirement of 69ha. It was not taken forward within the Local Plan, recognising that whilst some employment needs arising from urban extension(s) would be met within Crawley, at least some of the employment need generated would be met within the urban extension(s).
- 1.14 Further, as recognised at Paragraph 10.38 of the Northern West Sussex Economic Growth Assessment, January 2020 (Document Reference: ECO2), in a scenario where Crawley's business land requirements could not be located within Crawley, this would not necessarily translate into a commensurate increase in land requirements for adjoining authorities. This reflects that some businesses, if unable to locate in Crawley, may seek to locate outside the Functional Economic Market Area entirely.
- 1.15 Therefore, whilst that any urban extension(s) to Crawley would be expected to accommodate employment needs within the development itself, the CBLP, through the Gatwick Green allocation, provides headroom capable of responding to employment needs above the CBLP figure of 17.93ha. This provides flexibility for the CBLP to respond to wider demands including market signals evidence around logistics needs, and job growth associated with urban extension(s) to Crawley.

Conclusion

- 1.16 Overall, the CBC position remains unchanged from that of the council's Regulation 19 representation (Response #1194005) to the submission draft Horsham District Local Plan (HDLP) Regulation 19 consultation on 1 March 2024. To confirm, there is no unmet employment need arising from Crawley over the Plan period.