



Hearing Statement – Matter 4: Business and industrial needs

**Horsham District Council Local Plan 2023-2040:
Examination in Public – April 2026**

Prepared on behalf of Thakeham Homes Limited

Thakeham House,
Summers Place, Stane Street,
Billingshurst, West Sussex
RH14 9GN

Prepared by:

Dr Chris Lyons MRTPI

SLR Consulting Limited

Mountbatten House, 1 Grosvenor Square, Southampton
SO15 2JU
SLR Project No.: 433.000082.00001

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Revision: 3

1.0 Matter 4 – Business and industrial needs

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

- 1.1 No. We believe the Plan does not make sufficient provision for business and industrial needs. The reasons are clearly set out below but in summary, the evidence base is out of date, and the Council also has not considered the increase in housing numbers that will require additional employment opportunities for those residents. As a result, the Council has underestimated the amount of employment floorspace that is required and sustainable new settlements offer an obvious solution to the need for jobs that are located close to the highway network and can provide for a variety of different types of employment.
- 1.2 We note that the Council is relying on **EC02** for an analysis of the Northern West Sussex Area and that this report was then revisited under **EC01** to reflect the assumptions and the impact of Covid-19. However, while EC01 is more up to date, it is still dated from November 2020 and is clearly written in the middle of the pandemic with para. 4.12 stating “*While restrictions remain in place to varying degrees across the country, and may do so for some time, it is difficult to anticipate the full extent of the economic shock at the time of writing*”.
- 1.3 We are very surprised this report has not been updated as there are many well documented examples of businesses returning to the office as the economy moved away from the restrictions that were put in place during the pandemic. The period following the pandemic bears little to no relationship with the period during the pandemic, yet this is the period that the Council’s evidence base dates from. It would be fundamentally unsound to base the plan’s approach to employment needs on data from that period, because that would be tantamount to projecting forward into the plan period, trends and data that were based on a period characterised by an unprecedented global supply shock.
- 1.4 The report makes clear in para. 4.12 that the assumptions have reduced the forecast job growth by 15% overall and 42% for B class jobs. These assumptions are highly unlikely to therefore remain accurate, and we suggest that an updated review would find an increased demand for jobs over those figures.
- 1.5 The Council is also focusing on very traditional employment needs, whereas the NPPF (2023) states policies should include:

“...making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution



operations at a variety of scales and in suitably accessible locations.” (para. 83).

- 1.6 The later NPPF (2024) has gone further as the economy has developed and states planning policies should:

“pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;” (para. 86c)

- 1.7 In addition, if there is significant increase in housing numbers then it follows there is a need to increase the employment needs forecasts. The Council’s matter 4 statement (**HDCJB09**) clearly identifies the link in para. 17 of the statement where it references the demand is based on 965dpa. While it may be true that the demand does not increase at the same rate as Crawley, it is clearly the case that there should be a considerable increase if the housing number increases in multiples. HDC also has an aspiration to reduce out-commuting which will require better land availability for employment.

- 1.8 We cannot therefore comment on Table 2 or the arguments made in paragraphs 16-22 are accurate until a new assessment is undertaken. While it may be true that all of the unmet employment need may not move from Crawley or Brighton to Horsham, it is also unlikely that none of it will move but this needs to be properly assessed. This is likely to lead to the scenarios in Table 2 being re-run with different figures.

- 1.9 We believe the Economic Growth Assessment needs to be updated to understand what the need actually is and we suspect that this will show there is an increased demand.

- 1.10 The NPPF (2024) sets out that the Government is keen to ensure planning policies provide for storage and distribution operations at a variety of scales and in highly accessible locations (para. 87). Any site near the main road network would therefore be in a prime location, such as Wealdcross, at the crossroads of two A roads.

- 1.11 The NPPF (2024, ch. 8) also encourages active communities where people can walk whenever possible and so sites that can provide for employment opportunities within walking distance of homes and shared spaces should be prioritised, as they maximise sustainable development. The NPPF (2024) also recognises that this leads to inclusive communities. It is stated that planning policies should:

“promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres,



street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;” (para. 96a).

- 1.12 To ensure the Plan is considering emerging Government policy, it is important to look to the emerging NPPF (2025) which has clear statements about mixed use developments and strategic sites. For example, proposed Policy HO4 specifically talks about the need for large scale development, such as new settlements, as they can support sustainable communities that allow people to access employment within the development itself.
- 1.13 There is also a whole section (16) on promoting healthy communities with an emphasis on delivering sites that have good opportunities for play, health, community, leisure, jobs and houses all located in close proximity to each other. Policy HC 3 also sets out the importance of sites that will have a significant number of people should have community and public services located on site and policy HC4 says where this happens then “substantial weight” should be given to the community facilities.
- 1.14 There are not enough sites available within Horsham that are within easy walking distance of town centres or facilities and so new sustainable settlements should be a focus of support from the Council. They provide scale for jobs to be located on site and also to allow inclusive communities where jobs can be within walking distance.
- 1.15 The Council appears to accept this in para. 27 of HDCJB09 as it states there are further opportunities to allocate land for employment uses on additional strategic sites, as they have potential to deliver growth. We agree with this approach.
- 1.16 Sites like Wealdcross are offering up to 30,000 m2 of employment generating space, co-working facilities and flexible office spaces helping business start and grow in the District, while creating c.2,800 jobs. These includes a wide variety of jobs within engineering, manufacturing, industrial, logistics, retail, community facilities etc. with enough space to allow flexibility. This is as proposed in para. 82(d) of the NPPF (2023) which requires flexibility in the plan to be able to respond to changing economic circumstances.



