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**Examination of the  
Horsham District Local Plan 2023-40  
Matter 4: Business and Industrial Needs – 23<sup>rd</sup> April 2026 - PM  
Hearing Statement on Behalf of  
Verve Investments Ltd (Graylands Estate) – Response ID: 1194247**

**Inspector's Question: Whether the plan makes sufficient provision for business, industrial and logistics needs**

Verve Investments owns and manages the Graylands Estate, Langhurstwood Road, Horsham. The West land is proposed to be allocated for additional employment development (Table 6: Employment Site Allocations – Site EM2).

Whilst it is understood that this Draft Local Plan is only making provision for economic needs to reflect the NPPF (2023) housing needs and its related supporting economic requirements, Verve Investments is concerned that a conservative approach to meeting economic needs does not reflect the continued lag in the strategic sites contributing to economic needs, which must be addressed in the short and medium term by existing employment sites through intensification and expansion of employment land. This will provide a safeguard against continued delay in delivery and for some existing commitments to also be delayed.

With regard to employment uses in Use Classes E (g) (iii), B2 and B8 uses, the costs of applying for and obtaining planning permission and then the implementation of the permissions can be cost prohibitive without planning certainty, delivered by allocations within the Local Plan and then subsequently planning permission. Funders will lend on achieving a planning permission, albeit that this can be preceded by confirmed allocations in an adopted Local Plan. This is particularly so for an employment site that whilst on the edge of Horsham, is considered to be a rural location and therefore not a certainty in planning and development terms.

For Horsham to remain competitive and to seek to attract sufficient jobs to support the existing community with the potential to aim to become a net importer of jobs rather than exporter (Employment Topic Paper March 2026 paragraph 17), the allocation of sufficient land to allow for the inevitable delay in the delivery of the strategic allocations in Horsham, should be a priority. This is particularly so, where existing employment sites do not have high infrastructure requirements to support the development of employment expansion and are therefore not as constrained by wider economic events that may impact on delivery of economic development.

It is considered that Horsham should maximise the potential of existing employment sites or Key Employment Areas (KEAs) in recognition of the earlier delivery of new employment opportunities. The economic and industrial sector is needing to respond to ever evolving employment needs and meeting new and innovative industrial activities including in the SME sector and to ensure agile supply, allocations need to be in place to support future employment growth and flexibility.

As will all policies and growth factors in planning, an economic growth target is not the upper limit of growth but should be a minimum aspiration to attract as much economic development that is suitable for any particular site. The growth in jobs supports new housing and visa versa. The NPPF (para 86) requires planning policies to be flexible enough to accommodate needs not anticipated in the plan and allow for new and flexible working practices and a rapid response to changes in economic circumstances.

The Council's evidence base accepts that when calculating employment needs in the longer term, the accuracy of any predictions becomes less robust (Employment Topic Paper para 23) and therefore falls back on future Local Plan reviews to address any shortfalls. This does not address that of the large floorspace identified as commitments, that some of this floorspace may not be delivered due to expiring permissions or allocations are not delivered in a timely manner.

The Employment Topic Paper (para 27), identifies that a third of the Council's employment needs is located within strategic land allocations. The employment development is predicted to be delivered towards the end of the strategic housing delivery which are also stalled by the current economic circumstances that are beyond the control of the Council or land promoters/developers. To rely on a third of the Council's economic needs on strategic land without some back up from existing KEAs puts the risk of failing to deliver the jobs and homes needed for the district, keeping an appropriate balance between the two.

In order for the current draft Local Plan to be considered to be sound delivering an aspirational but deliverable amount of Class E (g) (iii), B2 and B8 floorspace in KEAs, further allocations should be considered to allow for further strategic site delays and to continue to meet the growing needs of SMEs that need to respond in an agile manner to market demands. The Use Classes Order has not assisted in some regards given that light industrial development now falls within Class E and is therefore loosely absorbed into a town centre use, but it forms an important mix of uses on an industrial park, particularly where operational parking and delivery requirements may conflict with residential or other sensitive uses in town centre locations.

### **Proposed Policy 29 Amendment Sought**

Only amendment sought to Policy 29 is shown in red text – allocation to the West *and East* of Graylands Estate in Site EM2.