

SA1: Sustainable Economic Development - Additional Site Allocations - Index by ID Number

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
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Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA1

ID: 654

Response Ref: Reg19/654/2

Respondent: Mr S Molnar

Organisation: Terence O'Rourke

On Behalf Of: St Modwen Developments

Category: Promoter

Appear at Examination? x



Mid Sussex Site Allocations Development Plan Document Regulation 19 Submission Draft July 2020

Representations on behalf of St Modwen Developments

Policy SA1: Sustainable Economic Development- Additional site allocations Allocation SA4: Land North of the A264 at Junction 10 of the M23 (Employment Area)

St Modwen Developments (SMD) supports site allocation reference SA4, land north of the A264 at Junction 10 of the M23. This comprises 2.7ha and is identified for B1/B8 development.

This site is an excellent location for employment land, given its proximity to J10 of the M23 and with a recently constructed new access to the A264. SMD is in the process of building out existing employment on land to the north of the site for B8 use, and has seen considerable market interest that reflects this excellent location.

This allocation is considered to be sound as the site is in an appropriate location for meeting employment uses, is available for the type of development proposed, and its development is achievable and deliverable with a willing landowner and developer fully committed to bringing it forward in the short term. Its allocation for employment uses will help to contribute towards meeting Mid Sussex's employment need. It is therefore fully justified and contributes to the delivery of sustainable development. SMD has further comments below on some detailed aspects of the policy.

Comments on SA4

SMD notes that the first bullet point in site specific requirements seeks a mix of B1/B8 uses on-site with justification to be sought for the quantum of development proposed for each use.

However, SMD notes that the recent change to the Use Classes Order through The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, which came into force on 1st September 2020, has removed B1 as a use class and included the uses previously under B1 within a new class E along with a range of former A and D class uses, the new designation being class E(g).

More generally the Council will need to consider the implications of the new use class on its Site allocations DPD. In reference to SA4

Whilst the policy could be amended to refer to E(g) instead, SMD considers that the site is not large enough for a mix of E(g) (former B1) and B8. A viable B8 use would leave no space for E(g) use alongside; and conversely a significant element of E(g) would leave insufficient space for a viable B8 unit.

Given its location and the known demand in the area the site is more likely to be used for B8. It is acknowledged that the wording as it stands potentially provides scope for an applicant to promote a single use (either B1/E(g) or B8) with sufficient justification to show that there will be zero quantum of one or the other. However it could be interpreted that having a positive element of each in a mix is a firm requirement. It is therefore potentially over-restrictive and should ideally be changed to state:



" Proposals might be for either E(g) or B8 uses, or a mix of E(g)/ B8 uses if viable. Proposals should clearly set out the justification for the use. "

Notwithstanding this potential for either, SMD considers that the site's most likely use in the current market is for B8, and provides the following supporting information to support the use of the site for a B8 unit:

- A report prepared by JLL (Industrial Market Report, September 2020) that provides an overview of the industrial property market relevant to the allocation. The report considers both demand and supply of the allocated site's relevant market area. The report concludes that, despite the recent impact of Covid-19 and Brexit, the market for industrial and warehouse property is still buoyant with market confidence high. Demand outstrips supply, with this manifestly shown by developers, including SMD, still committing to speculative development.
- A potential layout for a B8 building (ref 19226 SK0001 rev A), comprising a warehouse with ancillary office space and ancillary parking and servicing areas. This is set towards the western side of the site to allow space for a community park on its eastern edge next to the main site access road serving the site. The service yard is located to the north of the building, and car parking is to the east between the building and the community park. The existing footpath/cycleway is relocated to run alongside the park and south of the building to the A264 underpass. New planting in and around the park and around the building to complement existing vegetation will ensure that it does not appear dominant and help to screen it in views from the A264 and the site access road to the south and east.
- Three computer generated images (CGI 001, CGI 002 and CGI 003) that show indicative views of the proposed building in viewpoints from the south and east, from view positions as identified in drawing ref 19226 SK0002 Rev A. The CGIs show the site when planting has matured and indicate how the building will be well screened.

This material clearly illustrates that the site is suitable for a single B8 unit that can be accommodated successfully on the site with high quality design and layout, with a comprehensive landscape scheme and screening as required by SA4.

SMD supports the flexibility in the 3rd bullet point that other employment generating non-business class uses will be permitted where B1 and B8 uses will not be economically viable. However, the points above about the removal of B1 as a use class and transfer of former B1 uses to use class E(g) will apply.

SMD welcomes the recognition in the final bullet point that the footpath/cycle route can be relocated as part of a detailed design proposal. The proposed site layout submitted in support of the allocation (see drawing ref 19226 SK0001 rev A) shows how this might be successfully relocated in the context of a B8 building on the site, to run along the eastern edge of the building then round the southern edge to the underpass at the A264, with links to a community park in the eastern part of the site.

Industrial Market Report

Terence O'Rourke on behalf of St Modwen Developments Limited

Representations in support of Allocation SA4 - Land North of the A264 at Junction 10 of the M23

September 2020

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1. Introduction

- 1.1. This report provides an overview of the industrial property market relevant to Allocation SA4 - Land North of the A264 at Junction 10 of the M23.
- 1.2. The report forms part of the evidence base referred to by representations made by Terence O'Rourke on behalf of St Modwen's Developments Limited (SMDL) in support of development of Allocation SA4 and land in the vicinity of St Modwen Park, Gatwick (the marketing name for the first two phases of this development scheme). The focus of the report is **market** based. Evidence on the **need** for employment land in this location, to meet the needs of both Mid Sussex and Crawley (the adjacent local planning authority to the west of the M23), is provided in a separate, but complementary report, by Boyer Planning.
- 1.3. The report considers both demand and supply of the allocated site's relevant market area. Section 2 looks at demand. This includes data on take up, development and enquiries received. Section 3 considers supply, both in terms of modern available premises and the pipeline of supply. In addition, the report assesses market signals such as rents and land values.
- 1.4. The report concludes that, despite the recent impact of Covid-19 and Brexit, the market is still buoyant with market confidence high. Demand outstrips supply, with this manifestly shown by developers, including SMDL, committing still to speculative development. There is a manifest shortfall of development land, which Allocation SA4 will help to meet.

SMDL

- 1.5. St Modwen specialise in the development of industrial and logistic buildings across the UK. Earlier this month, it launched its latest plans for this sector of the market. It is looking to deliver 1.5 million sq ft of high quality industrial floorspace in the UK in 2021.

JLL

- 1.6. JLL is the biggest property agent in the UK and is particularly well known for its expertise and experience in the industrial and logistics market. It produces a number of research reports on different sectors of the market which are respected monitors for the industry.
- 1.7. JLL is an active agent in the sub-region in terms of industrial premises and development sites. Current instructions include: -
 - Valor Park, Gatwick 30
 - Unit A, Woolborough Lane, Crawley
 - Midpoint 23, Pease Pottage
 - Horley Business Park.

2. Demand Profile for Industrial Property

Market Overview

- 2.1. The site is located at Junction 10 of the M23. As such, whilst it is situated in Mid Sussex District, it is perceived by the market to form part of the Gatwick and Crawley market area. It is this market area that this report concentrates on.
- 2.2. The Gatwick and Crawley market area is the largest and dominant commercial centre in the sub-region. Its advantages include: -
 - Central location within the wider south east.
 - Excellent transport links and connectivity.
 - Access to a large and highly skilled workforce.
 - Strong quality of life factors.
- 2.3. These attributes have attracted a number of key sectors over time. These include: -
 - Aviation
 - Defence
 - Pharmaceutical
 - Logistics.
- 2.4. Proximity to Gatwick Airport has represented an important locational factor for some businesses. However, the airport does not have a substantial freight forwarding function, compared to say Heathrow, and accounts for a reduced share of market activity – between 5% to 10% according to the North West Sussex EGA Update: Final Report 2020 (Lichfields). Partly, this is because of the extent of Crawley's growth and the resulting expansion and diversification of its economic base over the last 25 years.
- 2.5. Since the economy recovered from the recession of 2008-2011, the Gatwick and Crawley market has been particularly buoyant. Activity levels – such as take up and development – are considered in greater detail below. In addition, the next section considers other market signals such as increases in rents and land values.
- 2.6. Pre the Covid-19 crisis, demand levels for modern and new industrial premises remained healthy. Take up and enquiry levels have understandably reduced since lockdown in late March. However, our agents still report reasonable market activity, particularly for enquiries supported by online trading and e-commerce. In addition, developers are still seeking development opportunities.
- 2.7. Post Covid-19, the market is uncertain, particularly in the short term. The resulting recession will have a severe impact on demand from certain sectors of industry (e.g. advance manufacturing). However, we anticipate growth in other sectors, particularly: -
 - Retailers growing their online function (particularly grocery)
 - Logistics companies
 - Parcel delivery operators
 - Food processing

■ Pharmaceutical.

- 2.8. In the medium term, we consider that as a consequence of the Covid-19 pandemic crisis, there could be greater “re-shoring” and increased sourcing of goods and raw materials closer to the market at the point of consumption, in order to reduce supply chain risks. This may also lead to companies holding more buffer stock (i.e. inventory) to cover for elevated supply chain risks and uncertainties. These implications could be compounded by Brexit, if this results in in-bound UK supply chains becoming less productive or slower, due to border issues.
- 2.9. In summary, the market fundamentals pre Covid-19 for Gatwick and Crawley were strong. There was healthy demand and limited supply of both modern premises and developable land catering for this sector. Despite the uncertainty caused by Covid-19 and Brexit, we consider the market for new industrial floor space in this location will be resilient.

Demand Profile

- 2.10. Gatwick and Crawley’s location, excellent communications, and highly skilled and accessible labour force, make the area very attractive for occupiers. When good quality, modern industrial and warehousing space come to the market, it has proved popular with occupiers.
- 2.11. Table 1 provides details of the principal letting transactions over the last three years. The more recent transactions are listed first.

Table 1: Principal Letting Transactions in Gatwick and Crawley over the last three years

Scheme	Date	Grade	Size (sq ft)	Rent (£psf)	Term	Tenant
North Gatwick Gateway, Horley	Under Offer	New	42,524	Confidential	Confidential	Amazon
Sterling Park, Manor Royal	Q2 2020	Secondhand	65,000	£12.50	20 years	New Rest
St Modwen Park, Gatwick, Junction 10 M23	Q1 2020	New	100,008	£13.25	15 years	Gatwick Airport Limited
Unit 2, Space Gatwick	Q1 2020	New	46,300	£10.78	3 years annual breaks	Yusen Logistics
Unit 1, Space Gatwick	Q4 2019	New	37,405	Confidential	5 years	Amazon
North Gateway, Gatwick, Horley	Q4 2019	New	49,887	£12.50 - £13.75	5 years	Brymec
The Warehouse, Faraday Road	Q3 2019	Secondhand	23,500	£12.00	10 years with break at 5	Transvalair
Unit 1, Centron, Compton Way	Q2 2019	New	20,136	£13.75	15 years with break at 10	Mel Components
Diamond Point, Crawley	Q3 2018	Secondhand	114,710	£10.25	15 years	CAE
Unit 1a, Gatwick Gate	Q2 2018	Secondhand	15,723	£10.25	7 years	World Duty Free

Source: JLL

- 2.12. These transactions total 515,193 sq ft and demonstrate a good depth of demand for both new and secondhand industrial and warehouse premises.
- 2.13. Another indicator of strong demand is development activity, particularly speculative development. Recent development activity is scheduled in Table 2 below.

Table 2: Recent Development Activity in Gatwick and Crawley

Scheme	Developer	Development	Comments
Gatwick 55, Rutherford Way, Crawley	Goya	55,000 sq ft	Pre-let to Baker and Stonehouse.
Gatwick 33, London Road, Crawley	Goya and Barwood	33,248 sq ft	Built speculatively and available.
Centron, Crompton Way, Manor Royal	Wrenbridge	53,500 sq ft in two units	Built speculatively. A unit of 20,136 sq ft has been let to Mel Components. A unit of 33,402 sq ft is still available.
North Gatwick Gateway, Horley	Goya and Hillwood	5 units totalling 168,674 sq ft	Built speculatively. Two units let to Brymec and Amazon – with three units available from 20,646 sq ft to 30,871 sq ft.
St Modwen Park, Gatwick, Junction 10, M23, Copthorne	St Modwen	100,008 sq ft	Pre-let to Gatwick Airport Limited
Space Gatwick. Manor Royal	London Metric	Two unit scheme of 83,705 sq ft	Speculatively built. Both units let – to Yusen and Amazon

Source: JLL

- 2.14. The extent of speculative development is a true sign of market confidence. Development has not been limited to one or two developers. Instead, a number of developers have committed to speculative development, with developments competing for occupiers. This illustrates well the depth of demand.

St Modwen Park, Gatwick

- 2.15. The St Modwen scheme, that is adjacent to Allocation SA4, also helps to demonstrate the strong demand levels.
- 2.16. The first phase was pre-let to Gatwick Air. Gatwick Air have taken a 15 year lease, with no breaks, for a unit of 100,008 sq ft. Their lease was signed in September 2019 with a headline base rent of £13.25 per sq ft. This unit is substantially complete (with practical completion due in October 2020).
- 2.17. SMDL has recently committed to build speculatively the second phase of this development. A unit of 64,752 sq ft is proposed. Construction will start in October 2020, with practical completion due Q2 2021. Already, there is good market interest in this unit, particularly from the logistics and e-commerce sectors.
- 2.18. Allocation SA4 represents a potential third phase. This site can accommodate a single unit of 115,000 sq ft on a conventional basis or a smaller cross-dock building on a lesser density. Whilst no planning permission is in place for this phase, there is already good market interest being received from logistics and e-commerce companies looking for a bespoke build to suit unit.

Summary

- 2.19. Gatwick and Crawley is the largest and dominant commercial centre in the sub-region. Its attributes, such as excellent communications, have attracted a number of key sectors.
- 2.20. Since the economy emerged from recession in 2012, the market for industrial and warehouse premises has been particularly buoyant. The Covid-19 pandemic and Brexit has introduced some market uncertainty. However, despite this, we consider the market for new industrial floor space in this location will be resilient.
- 2.21. This has been demonstrated by the level of take up of modern premises and development activity. Specifically, there has been significant speculative development, which is a real litmus test revealing the strength of demand.
- 2.22. St Modwen Park, Gatwick, illustrates well the strength of current demand and market confidence. The first phase had been pre-let and SMDL have committed to the speculative development of Phase 2 as a response to current enquiry levels.

3. Supply of Industrial Premises and Sites

Qualitative Requirements for Occupiers

- 3.1. The most basic requirement for occupiers of modern industrial warehouse premises is access to the strategic road network. Occupiers will avoid premises or sites which have to route through congested built up or residential areas. Premises or sites located at major junctions to motorways or trunk A-roads are at an obvious premium.
- 3.2. Many industrial warehouse operators run on a 24/7 basis. As such, operators will seek premises which are well separated from existing or proposed housing.
- 3.3. Operators will require certain design features. These include: -
 - Buildings with good eaves height (12m and above).
 - Sufficient and secure yard space.
 - Ample parking for both cars and HGVs.
 - Docking and loading doors.
 - Good electricity and gas connection.
- 3.4. In addition, increasingly operators look for well designed buildings in pleasant or landscaped settings. This is an important requirement for attracting and retaining staff in areas of low unemployment.

Constraints on Supply

- 3.5. The supply of industrial premises serving the Crawley and Gatwick market area is constrained both quantitatively and qualitatively. There has been limited expansion beyond the built conurbation, because of protective planning policies. In addition, the vast majority of industrial floor space is located in Manor Royal.
- 3.6. The latter does provide certain advantages in terms of conglomeration, but restricts the range and choice of alternative locations. Other business or industrial parks serving Gatwick and Crawley tend to be small, surrounded by residential property, and are not as well related to the strategic road network. Often, they are home to quasi employment/retail activities or offices. In addition, they are mostly built out with little, if any, spare development land.
- 3.7. Manor Royal also has only a limited supply of development land. Most development opportunities for industrial property come through the recycling of older premises.
- 3.8. A good example is Churchill Court, Manor Royal. This site currently accommodates an office building. Equation Estates have purchased the site – 3.8 acres – for £8.95 million on an unconditional basis. They propose to build two units of 20,000 sq ft and 60,000 sq ft and are indicating a quoting rent of between £14.75 and £15.25 per sq ft.

Market Signals

- 3.9. The above example is another demonstration of the strength of demand for new industrial and warehouse premises in the Gatwick and Crawley market area. It also shows the relative strengths of the office and industrial markets, with industrial property now at the forefront.
- 3.10. The growth in demand for industrial property can be gauged further by market signals such as rent and land values. Both have witnessed significant increases over recent years.
- 3.11. In 2015, the highest rents paid were around £9.00 per sq ft. Last year, the highest rent paid was £13.75 (by Mel Components for a 20,000 sq ft at Centron, Crompton Way). Quoting rents for proposed developments (see below for details) now exceed £15.00 per sq ft.
- 3.12. Similarly, land values have grown exponentially. This is due to the rental growth and compressed investment yields. In 2011, land values for industrial development land was circa £1 million per acre. Now, land values have risen to above £2.5 million per acre.
- 3.13. For example, Goya Developments bought the former Phillips site in Horley (7.7 acres – now developed as North Gatwick Gateway) for £20 million. This breaks back to £2.6 million per acre.

Supply of Premises and Sites

- 3.14. Whilst there has been active speculative development, the number of modern premises currently available in Gatwick and Crawley is not substantial. The principal units being marketed are listed below in Table 3.

Table 3: Available Modern Industrial and Distribution Premises in Gatwick and Crawley

Scheme/Property	Size (sq ft)	New/Secondhand	Quoting Rent (£)
Gatwick 33, London Road	33,294	New	£15.00
Centron, Crompton Way	33,402	New	£14.50
Unit 1, North Gatwick Gateway	30,871	New	£13.50
Unit 2, North Gatwick Gateway	25,746	New	£13.50
Unit 2, North Gatwick Gateway	20,646	New	£13.50
2 Crompton Fields, Crompton Way	25,000	Secondhand	£11.00
Valour Park, Gatwick 30	30,395	Secondhand	£15.00
Unit A, Woolborough Lane, Crawley	47,535	Secondhand	£14.00 (subject to refurbishment)

Source: JLL

- 3.15. The range or choice of premises, particularly in terms of size, is also limited. Most unit sizes fall into the 20,000 sq ft to 35,000 sq ft range. Only one unit is above 35,000 sq ft (Unit A, Woolborough Lane at 47,535 sq ft) and none above 50,000 sq ft.
- 3.16. The number of proposed development projects is also limited. The principal projects are set out in Table 4.

Table 4: Proposed Development Projects

Scheme	Developer	Proposed Development	Comments
St Modwen Park, Gatwick	St Modwen	64,752 sq ft	Phase 2. Single unit. Construction about to commence. Quoting rent of £14.25 per sq ft.
Churchill Court, Crawley	Equation	85,000 sq f	Two units at 20,000 sq ft and 65,000 sq ft. Quoting rent of £14.75 to £15.25 per sq ft.
Midpoint 23, Pease Pottage	Arcus	86,000 sq ft	Multi-let scheme, with unit sizes from 9,558 sq ft to 39,000 sq ft. Quoting £12.50 per sq ft. Construction to start Q1 2021.

Source: JLL

3.17. We are aware of two other sites which may come forward. These are: -

- Napier Way, Manor Royal.
- Horley Business Park.

3.18. The former is a 7.7 acre site in Manor Royal, currently on the market. Best bids were due on 18 September 2020. It has been reported that the sale has attracted significant interest.

3.19. The latter is an allocation in the Reigate and Banstead Local Plan. It is a well located site with direct access to Junction 9A of the M23 and is a joint venture between the landowner, Reigate and Banstead Borough Council, and Berwick Hill. It is a mid-term project, with the majority of the proposed development for offices.

St Modwen Park, Gatwick

3.20. Allocation SA4 represents a potential third phase of St Modwen Park, Gatwick. It enjoys all the necessary attributes to accommodate and attract industrial occupiers. These attributes include: -

- Direct access to the A264 at Junction 10 of the M23.
- Established industrial location following Phases 1 and 2.
- Separation from recent and current housing.
- Pleasant natural and landscaped setting.

3.21. The site measures 6.7 acres (2.7 hectares) gross. This can accommodate a unit of up to 115,000 sq ft. Very few other sites in Gatwick and Crawley market area are able to accommodate units of this size and this places the site at a premium.

Summary

3.22. The supply of modern industrial premises serving the Gatwick and Crawley market is thin, both quantitatively and qualitatively. This is despite a strong and active development market providing a stream of speculatively built units.

3.23. In addition, the pipeline of new sites is restricted relative to demand. The availability of new premises coming to the market will not be sufficient to accommodate recent and current demand levels. There is a manifest shortage of employment development land.

3.24. This imbalance in the market, of demand over supply, has led to significant increases in rents and land values over the last 5 years. To ensure that industrial premises do not become unaffordable, further development land needs to be brought forward in both the short and medium term.

- 3.25. Additional land as proposed by Allocation SA4, is particularly well suited to meet this demand. It enjoys all the necessary attributes to accommodate and attract industrial occupiers and, unlike most recent developments, can provide buildings of scale.

4. Conclusions and Summary

- 4.1. Gatwick and Crawley is the largest and dominant commercial centre in the sub-region. Its attributes, such as excellent communications, have attracted a number of key sectors.
- 4.2. Since the economy emerged from recession in 2012, the market for industrial and warehouse premises has been particularly buoyant. The Covid-19 pandemic and Brexit has introduced some market uncertainty. However, despite this, we consider the market for new industrial floor space in this location will be resilient.
- 4.3. This has been demonstrated by the level of take up of modern premises and development activity. Specifically, there has been significant speculative development, which is a real litmus test, revealing the strength of demand.
- 4.4. St Modwen Park, Gatwick, illustrates well the strength of current demand and market confidence. The first phase had been pre-let and SMDL have committed to the speculative development of Phase 2 as a response to current enquiry levels.
- 4.5. The supply of modern industrial premises serving the Gatwick and Crawley market is thin, both quantitatively and qualitatively. This is despite a strong and active development market providing a stream of speculatively built units.
- 4.6. In addition, the pipeline of new sites is restricted relative to demand. The availability of new premises coming to the market will not be sufficient to accommodate recent and current demand levels. There is a manifest shortage of employment development land
- 4.7. This imbalance in the market, of demand over supply, has led to significant increases in rents and land values over the last 5 years. To ensure that industrial premises do not become unaffordable, further development land needs to be brought forward in both the short and medium term.
- 4.8. Allocation SA4 is particularly well suited to meet this demand. It enjoys all the necessary attributes to accommodate and attract industrial occupiers and, unlike most recent developments, can provide buildings of scale.



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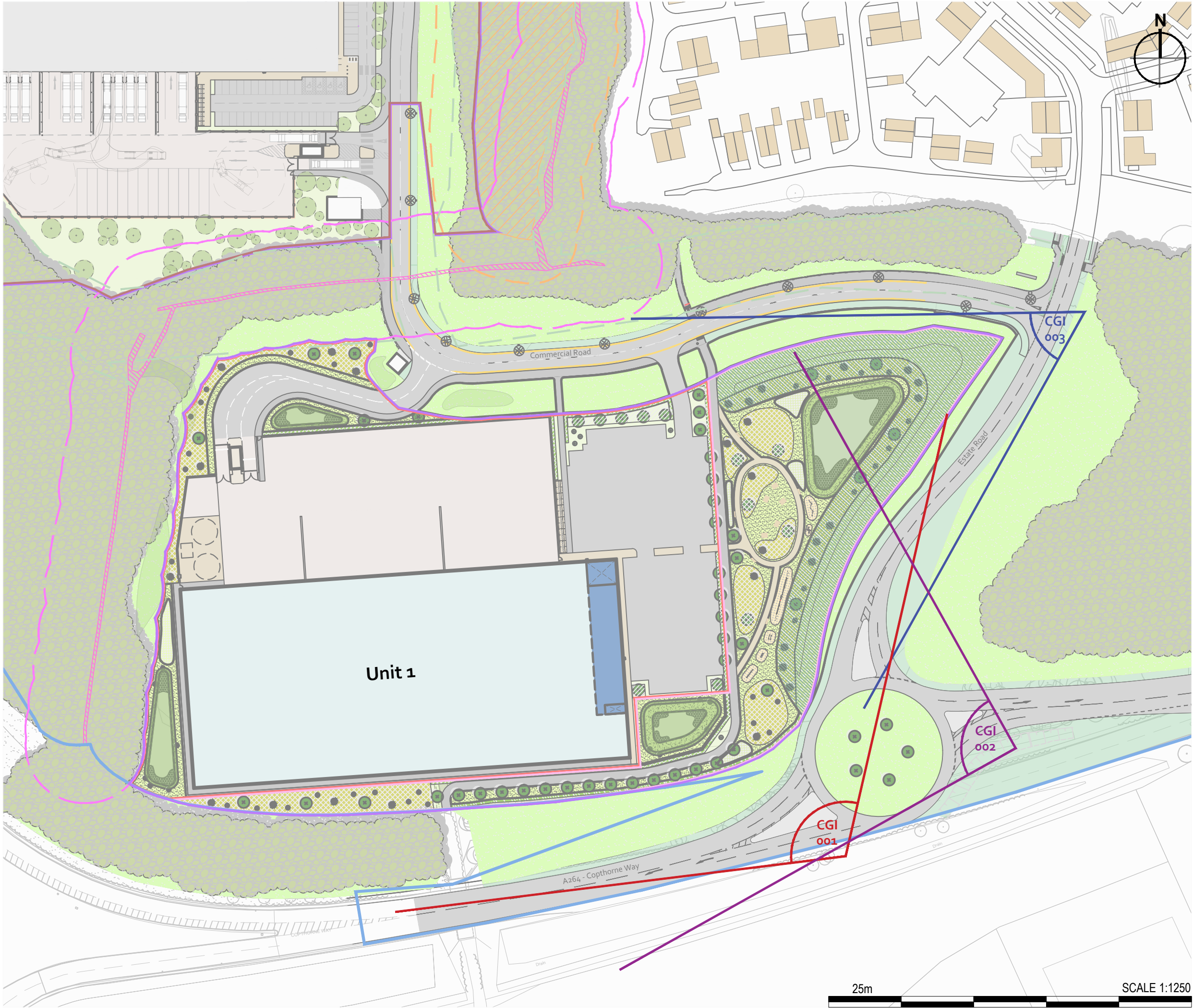
A	First issue.	JWY	TDA	03.08.20
rev	amendments	by	ckd	date
St Modwen Park, Gatwick				
L1 Plot				
Proposed Site Layout				




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Drawing Status:	Sketches
Drawn / Checked:	JWY / TDA
Date:	03.08.2020
Scale:	1:1250 A3

St. Modwen Drawing Ref:	Revision:
Drawing no: 19226 SK0001	 A



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A	First issue. To be read in conjunction with CGIs.	JWY	TDA	03.08.20
rev	amendments	by	ckd	date
St Modwen Park, Gatwick				
L1 Plot				
CGI View Location Plan				



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Drawing no:	Revision:
19226 SK0002	A









Mid Sussex Site Allocations Development Plan Document Regulation 19 Submission Draft July 2020

Representations on behalf of St Modwen Developments

Policy SA1: Sustainable Economic Development- Additional site allocations

Omission of Site 999

At the Regulation 18 consultation draft plan stage, SMD proposed that land at Site 999 is an appropriate site for further employment land to be allocated in the Site Allocations DPD. SMD notes that the site has not been included in the Submission Draft, and considers that this is an opportunity missed to provide employment land in a sustainable location.

It is noted that the site selection paper (Site Selection Paper 4: Employment Sites, February 2020) states that the site (site 999, table 4) was not allocated for development, as establishing access would necessitate the loss of protected woodland.

However, an access to the site is achievable without losing any of the protected woodland. This access solution is indicated on the attached drawing (reference 24205/SK055 Rev C).

The creation of the access could be achieved as shown with careful design to minimise potential impact on trees in the ancient woodland area. The access can be created by reconfiguring the existing earthworks supporting the access ramps to the footbridge over the M23, that are not part of the ancient woodland area. Appropriate landscape planting can be specified in the policy requirements.

Given this solution to the site access, the stated reason for not allocating the site is not relevant, which leaves it open as a good opportunity for inclusion in the plan.

SMD has carried out a site appraisal using MSDCs proforma, and previously submitted this with comments on the Regulation 18 plan. This is also attached to these comments. The analysis shows that the site is an excellent location for B1/B8 uses, with limited constraints, excellent accessibility and high market visibility.

It is also adjacent to the existing employment development to the south, that is showing high levels of market interest. Access to the site would be provided via the existing employment area and the new roundabout junction on the A264, which has capacity to allow more development.

SMD raises the following points regarding the published site selection form for Site 999. These are:

- Landscape is scored low. However the adjacent land to the south is employment land housing a B8 building, and SMD considers that a low/medium score is more appropriate.
- Achievability is scored yellow as it is assessed as a medium term prospect; however SMD has indicated on the attached drawing how access can be achieved and believes that this can be provided in the short term, so this should score green
- Market is scored poor, a surprising conclusion given its position adjacent to an existing employment site, and the strong demand for the premises under construction there. This should be scored very strong.



- Visibility is scored low. However, in terms of market visibility, this is actually high. The site lies adjacent to M23 and close to the A264, and will be part of a larger employment area that is showing high demand. A report prepared by JLL is attached to this representation, and this report shows strong evidence of this high demand (Industrial Market Report September 2020, by JLL).

Consideration should be given to the inclusion of the site as an additional allocation, which would provide additional flexibility to the range of sites allocated for employment.

Employment need

SMD notes that the method for converting employment forecasts to a land requirement was found sound at the examination of the District Plan, so MSDC has used the same approach for the site allocations document, with more up to date economic forecasts.

We note that this work has shown that an additional 10-15ha of B-Class employment land is required. The figures indicate a need of just over 8ha in B8.

It is also noted that 17.45 ha is allocated. The excess (over the 15ha upper end need) is there to ensure robust delivery of the need figure.

SMD supports the proposal to provide land in excess of the upper end of the identified need. However SMD considers that SA1 is somewhat unambitious in identifying only 17.45ha. Whilst this meets (and exceeds) the calculation of need in Mid Sussex using the same method as in the District Plan, it does not take account of the location of mid Sussex at the heart of the Gatwick Diamond, which brings potential to enhance the economic prosperity of the wider area. It is important that Mid Sussex takes a wider view and benefits fully from the opportunities this presents.

SMD has commissioned a report from Boyer Planning that reviews employment needs in Mid Sussex. This document, entitled Mid Sussex Employment Needs Review and dated September 2020, is attached to this representation. It provides evidence of the need for further employment land in the sub-region, including Mid Sussex.

The Boyer report concludes that Mid Sussex would be able to meet this additional need but to do so are reliant on the delivery of several proposed sites set out within the draft Site Allocations DPD. Should these draft allocated sites not be delivered or only part delivered, Mid Sussex would have a shortfall.

Additionally, it should be recognised that Mid Sussex are currently not taking into account the shortfall from the other local authorities in the Gatwick Diamond, particularly Crawley which is also within the North West Sussex sub area and therefore has particularly strong economic links to Mid Sussex.

SMD notes that the joint Economic Growth Assessment (2014) highlights a high degree of economic inter-relationship between Crawley, Horsham and Mid Sussex. Overall economic strength is dependent on ongoing and continued joint-working and effective management of strategic issues across the economic sub-region, particularly with those authorities whose economies are critically interrelated to Mid Sussex. It is notable that Mid Sussex aims to continue to support the Mid Sussex economy and wider economic sub-region in collaboration with other local authorities and alongside the work of the Coast to Capital Local Enterprise Partnership over the Plan period.



It is also notable that Policy DP1 of the adopted District Plan (Sustainable Economic Development) encourages new businesses to the District in order to meet aspirations for economic growth and the wider benefits this would bring.

The Northern West Sussex Economic Growth Assessment 2014 concludes that:

"There is a likelihood that Crawley will not be able to fully meet its identified business needs for the whole of the Plan period. In this context, there may be a requirement for unmet needs from Crawley to be accommodated in adjoining authorities (including Horsham District and Mid Sussex)..."

To promote the continued prosperity of the Gatwick Diamond and plan for its future growth, a Gatwick Diamond Local Strategic Statement has been prepared on a joint basis and endorsed by the two county councils and six local authorities covered by the area (including Mid Sussex). The Statement sets out a commitment among local authorities to work together to promote the economic function of the Gatwick Diamond, recognising the strength of Crawley/Gatwick as a business location.

SMD notes that Crawley's July 2019 Local plan consultation draft states in the Foreword that:

"Crawley will not be able to meet its housing and employment needs in full because of its small size and constraints including flooding, aircraft noise and safeguarding. We are, therefore, reliant on effective cooperation with our neighbouring authorities to help address Crawley's unmet needs. New development may come forward just outside Crawley's boundaries..."

The Boyer report notes that Crawley's draft Local Plan states that based on a continuation of past development rates, which is based on Crawley's constrained land supply position, there is need for a total of 33 hectares (143,990sqm floorspace) of employment land in Crawley over the Plan period.

It also states at paragraph 4.12 that there is potential for a greater level of business growth in Crawley, though this can only be planned for if current constraints on land supply were to be lifted. The Baseline Labour Supply, which uses Crawley's 'uncapped' housing need figure of 752 dwellings per annum, identifies a projected B-class business land requirement of 113ha (476,200sqm) over the Plan period.

At paragraph 4.14, it is noted that CBC identifies a total of 11.53 ha of employment land supply within the Borough. Considering this limited supply position in Crawley, paragraph 4.16 notes that there is an identified shortfall of between 21.5 and 101.5 ha of employment land in Crawley.

The Economic Growth Assessment suggests a number of solutions to meeting the subsequent employment shortfall in Crawley, one of which includes meeting need in other districts including Mid Sussex, Horsham and Reigate and Banstead.

Given site 999's location in Mid Sussex on the border with Crawley and close to Gatwick Airport, its allocation for additional employment land will help to contribute to this wider sub regional need, helping to meet both Crawley's unmet needs and the wider needs at the heart of the Gatwick Diamond.



The addition of a further site that can deliver 3.47 ha of additional B1/B8 will further enhance the ability to ensure robust delivery of the identified Mid Sussex need figure, and will enhance the ability to provide a contribution to Crawley's unmet needs on a site located adjacent to the Crawley Borough boundary.

The site is also an extension of an existing employment area that is in an excellent location next to J10 of the M23 that is seeing considerable interest in terms of marketing of the existing consents for B8 uses. The JLL report attached to this representation provide strong evidence of high demand.

The identification of the site in the Mid Sussex Site Allocations DPD will not only provide additional headroom to meet Mid Sussex's needs in the event that other identified sites do not come forward, it will also contribute to the wider economic needs of the Northern West Sussex area, the Gatwick Diamond, and the Coast to Capital Local Enterprise Partnership.



Site 999: Additional employment land north of A264 at Copthorne

Use Class: Suitability

B1: yes

B2: No

B8: yes

Use class: potential area

B1: 0

B2: 0

B8: 0

Mix: 3.47 ha

Total developable area 3.47 ha

Part 1 planning constraints

1 AONB	N/A	Site is remote from High Weald AONB
2 Flood risk	None	Site is outside Flood Zone 2/3
3 Ancient woodland	15m buffer	Ancient woodland adjacent, only the access point will pass through a small section of the ancient woodland buffer
4 SSSI/SNCI/LNR	None	Site not adjacent to any
5 Listed buildings	None	No LBs on site or adjacent
6 Conservation area	None	No CA on site or adjacent
7 Archaeology	None	No impact on archaeological assets
8 Landscape	Low/medium	Landscape evidence concludes there is low/medium potential for development in landscape terms.
9 Trees/TPOs	Trees on site	Limited tree removal required for access (but no removal of trees from within a protected area)

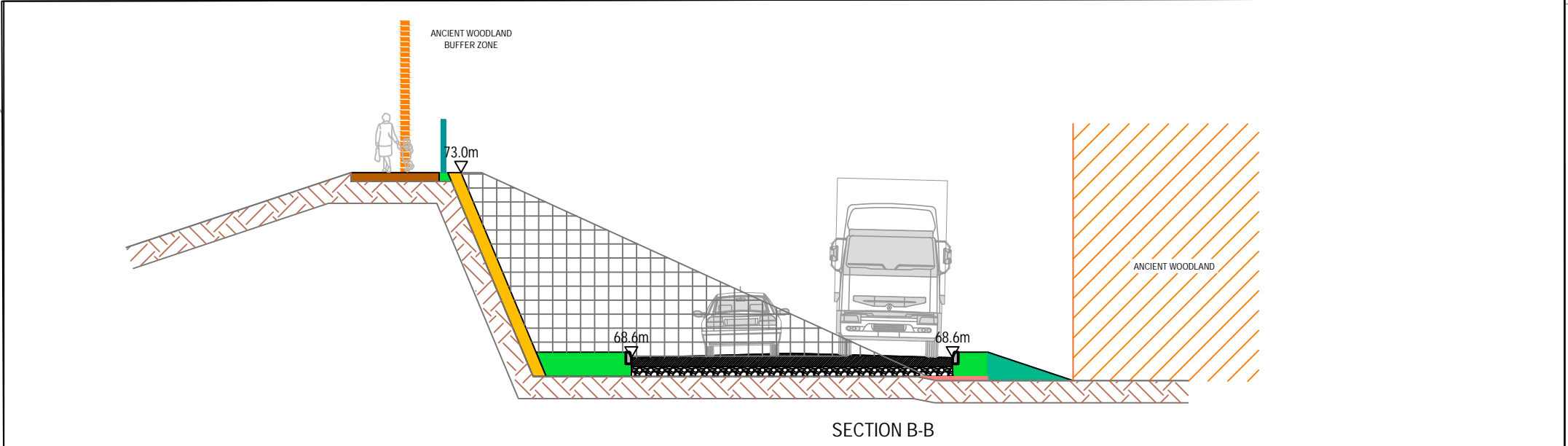
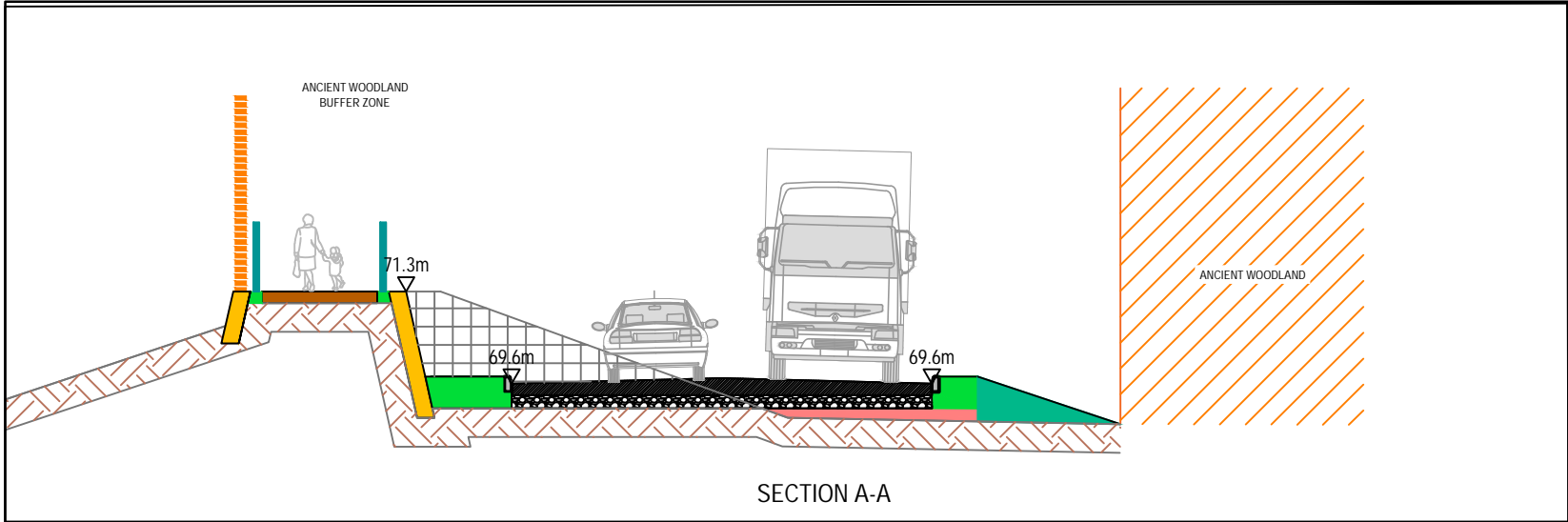
Part 2 accessibility

10 Highways		
11 Strategic roads	Excellent	Site is close to A264/M23 junction with good access onto A264
12 Infrastructure	Capacity available	Not expected to have significant infrastructure requirements
13 Availability	Promoted	Site is being promoted by landowner/developer
14 Achievability	Short term	Site is part of a larger mixed use scheme which is already consented and under active implementation, therefore may be deliverable in the short term.

Part 3 Market forces; jobs/market demand



15 Public transport	Good	The site will be served by a local bus network secured by the extant permission on the adjacent site. There will also be good pedestrian and cycle links, including a new route to the A2220 and onwards to Three Bridges rail station.
16 Compatibility	Compatible	The site is adjacent to an area already with permission and being developed for employment use, and will be distant from existing and proposed residential units.
17 Labour force	Very good	The location of this site means that it is likely to draw its labour force from East Grinstead and Crawley, as well as the nearby villages of Copthorne and Felbridge.
18 Market	Very strong	Due to the proximity of Gatwick Airport and other main settlements, there is likely to be a strong market for employment uses in this area. This is borne out by the strong demand for premises on the adjacent site.
19 Visibility	High	Site lies adjacent to M23 and close to the A264, and will be part of a larger employment area that is showing high demand.



NOTES:

1. THIS DRAWING SHOULD BE PRINTED IN COLOUR.

PLAN KEY:

- PROPOSED CARRIAGEWAY
- PROPOSED FOOTWAY
- PROPOSED FOOTPATH
- PROPOSED VERGE
- EXISTING 1 IN 3 EMBANKMENT
- PROPOSED 1 IN 3 EMBANKMENT (INDICATIVE EXTENTS)
- PROPOSED REINFORCED EARTH SLOPE (85 DEGREE ANGLE ASSUMED)
- PROPOSED VEHICLE RESTRAINT SYSTEM (INDICATIVE EXTENTS)
- ANCIENT WOODLAND
- ANCIENT WOODLAND BUFFER ZONE
- + 73.3m PROPOSED SPOT LEVEL (INDICATIVE)
- MASTERPLAN PROPOSED LAYOUT
- SECTION MARKER. REFER TO DRAWING NO. 24205/SK060 FOR LONG SECTION AND 24205/SK61 FOR CROSS SECTIONS.

OPTION 2 HIGH LEVEL EVALUATION	
ADVANTAGES	DISADVANTAGES
REDUCED FILL REQUIREMENTS	EXISTING APPROACH GRADIENT TO BRIDGE (APPROX. 1 IN 12)
IMPROVED CARRIAGEWAY VERTICAL ALIGNMENT	PROPOSED CARRIAGEWAY CLOSER TO ANCIENT WOODLAND
LESS WORK REQUIRED WITHIN HIGHWAYS ENGLAND LAND	
VEHICLE RESTRAINT SYSTEM LESS LIKELY TO BE REQUIRED	
CURRENT PROPOSED MASTERPLAN CAN BE ACCOMMODATED	
SUFFICIENT ROOM FOR FOOTWAY INTO MIDDLE FIELD AT CARRIAGEWAY LEVEL	

C	HIGHWAYS ENGLAND LAND BOUNDARY REMOVED	22.09.20	JLW	PR	PK
B	AMENDED TO INCORPORATE ACCESS FROM THE MIDDLE FIELD	20.03.20	JLW	PR	PK
A	ADDITIONAL INFORMATION ADDED	06.03.20	RT	PR	PK
Mark	Revision	Date	Drawn	Chkd	Appd

SCALING NOTE: Do not scale this drawing - any errors or omissions shall be reported to Stantec without delay.
UTILITIES NOTE: The position of any existing public or private sewers, utility services, plant or apparatus shown on this drawing is believed to be correct, but no warranty to this is expressed or implied. Other such plant or apparatus may also be present but not shown. The Contractor is therefore advised to undertake their own investigation where the presence of any existing sewers, services, plant or apparatus may affect their operations.

Drawing Issue Status
DRAFT FOR COMMENT

**COPTHORNE
MIDDLE FIELD ACCESS ROAD
CONCEPT DESIGN OPTIONEERING
OPTION 1 GENERAL ARRANGEMENT**

Client						
Date of 1st Issue 21/02/2020	Designed JLW	Drawn JLW	stantec.com/uk			
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Mid Sussex Employment Needs Review



Boyer

Report Control

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Client:	St Modwen Developments
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1. INTRODUCTION

- 1.1 This report has been prepared by Boyer (Development Economics) for St Modwen Developments Ltd to support representations at Land West of Cophorne in Mid Sussex district.
- 1.2 The site currently has planning permission for 500 homes, 15,500sqm of employment floorspace, a primary school, GP and informal open space. However, St Modwen are keen to pursue additional employment development on part of the site that is identified on the approved masterplan for informal recreation use.
- 1.3 The purpose of the report is to provide an overview of economic need and supply in Mid Sussex and the wider economic market area. This includes a review of the wider market area to determine if the area defined by the local authority is reasonable, a review of existing evidence and up to date employment projections for Mid Sussex and a review of existing evidence for the other local authorities defined as being within the same market area. It will conclude on the supply/demand balance in each of the identified local authorities.
- 1.4 Following this short introduction, the report is structured as follows:

Chapter 2: The Sub Region/Function Economic Market Area (FEMA) – this chapter will review existing published evidence on the sub-region/FEMA, including evidence relating to the 'Gatwick Diamond'. This will determine the economic relationship between Mid Sussex and surrounding authorities that will help to inform the assessment of need and supply in the subsequent chapters.

Chapter 3: Mid Sussex Evidence Review – this chapter will review published employment evidence documents along with up to date Experian economic projections for Mid Sussex to determine an appropriate employment need figure. It will also review monitoring data to establish completions and pipeline performance and will conclude on the supply/demand balance in Mid Sussex.

Chapter 4: Other Local Authorities Evidence Review – this chapter will review the evidence base for each of the key local authorities identified in Chapter 2. It will also review monitoring data to establish completions and pipeline performance and will conclude on the supply/demand balance.

Chapter 5: Conclusion – this chapter will bring together all of the above and will conclude on the overall supply demand balance in the whole market.

2. THE SUB-REGION/FUNCTIONAL ECONOMIC MARKET AREA (FEMA)

- 2.1 This chapter reviews existing evidence on the approach to defining a suitable sub-region for the area, including taking account of LEPs, FEMAs and other partnerships/initiatives. It considers the approach taken in Mid Sussex's employment evidence documents comprising the North West Sussex Economic Growth Assessment 2014 and the North West Sussex EGA Update. The appropriate sub – region will then be used for further analysis relating to employment need/supply and the wider market supply/demand balance.

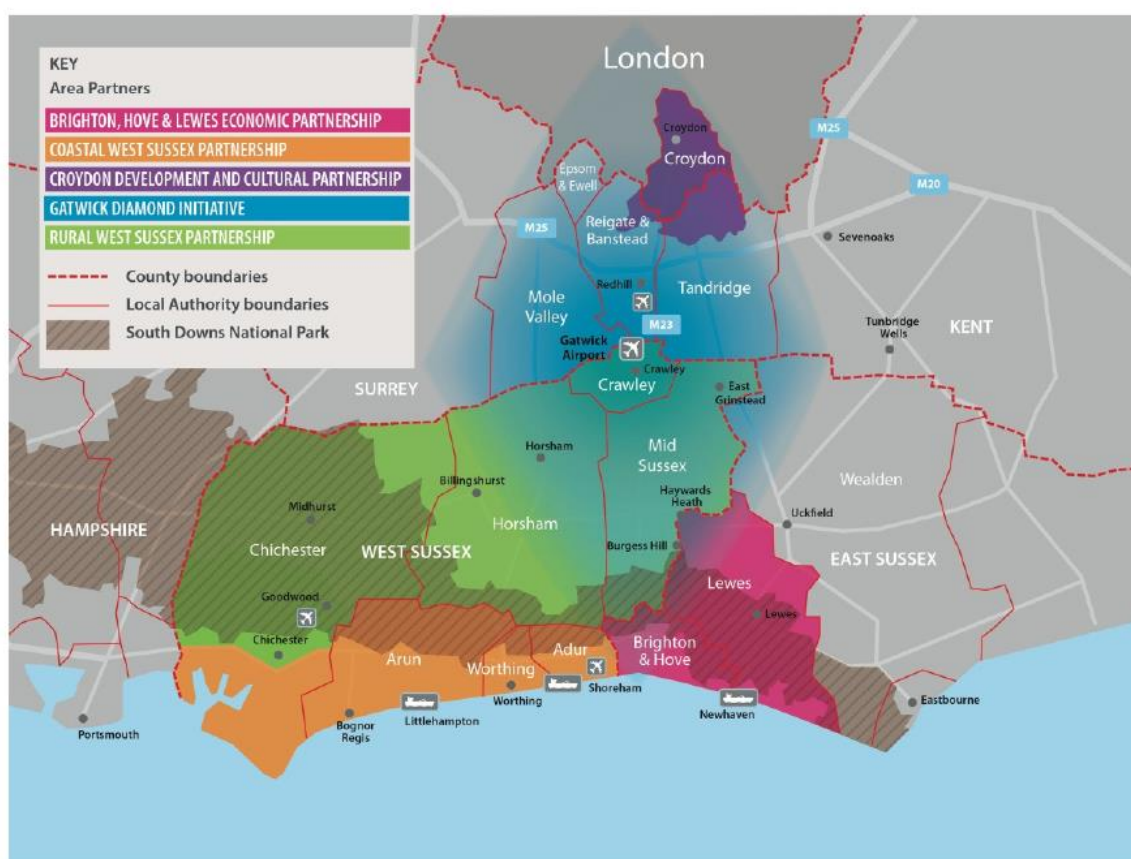


Figure 1 – Local Enterprise Partnership Areas (Source: Strategic Economic Plan, Cost to Capital LEP)

- 2.2 The National Planning Policy Guidance section that relates to economic needs sets out that as Functional Economic Market Areas can overlap several administrative areas, strategic policy-making authorities may have to carry out assessments on a cross-boundary basis with neighbouring authorities within their FEMA. It goes on to note that Local Enterprise Partnerships (and county councils) can play a key role in this process.

- 2.3 Based on the above, the first 'sub-region' to examine is the Local Enterprise Partnership area in which Mid Sussex is located – the [Coast to Capital LEP](#). This area has a total population of over 2 million people, covering an area of over 1,200 square miles from the south coast extending north to the southern boundary of London including Croydon. It has an economy worth £50.7 billion gross value added (GVA), making it the seventh largest local economy in England.
- 2.4 One of the most prominent sub-regions within the Coast to Capital LEP (as well as the wider South East) is the [Gatwick Diamond](#), as also shown on the map above. As the name suggests, the Gatwick Diamond is centred around Gatwick Airport in Crawley District. It includes a number of local authorities spreading out from Croydon and beyond into London to parts of Lewes/Brighton on the south coast. However, the 6 'core' local authorities surrounding Gatwick are Crawley, Horsham, Mid Sussex, Mole Valley, Tandridge and Reigate and Banstead.
- 2.5 The Gatwick Diamond is a reasonably long-standing and widely accepted spatial concept that was included within the former SEEDA Regional Economic Strategy and formed a sub-regional planning area for the purposes of the South East Plan. Under the auspices of the Gatwick Diamond Initiative, a group of local authorities (including Mid Sussex) have jointly agreed a Local Strategic Statement (LSS) to provide a framework for co-operation on strategic planning and development issues. This denotes an ongoing joint approach to planning across the Diamond.
- 2.6 Within the Gatwick Diamond, there are additional sub-areas that are more closely linked by working and commuting patterns. This is highlighted by the 2011 Travel to Work Areas (TTWA), which are based on Census data. These are areas where most people both live and work and therefore relatively few commuters cross a TTWA boundary on their way to work. As such, they are based on statistical analysis rather than administrative boundaries and thus are a suitable for looking for cross-boundary linkages between areas.
- 2.7 The TTWA that encompasses Mid Sussex also (approximately) covers the Sussex LPAs of Crawley and Horsham, as well as the Surrey authorities of Mole Valley, Reigate and Banstead and Tandridge.
- 2.8 In 2014 Mid Sussex, Crawley and Horsham commissioned consultants NLP (now known as Lichfields) to undertake an Economic Growth Assessment for the 'North West Sussex' area which comprised the three local authority areas. The sub-region forms the southern part of the 'Gatwick Diamond'. The EGA 2014 concluded that the area there is a high degree of economic inter-relationship between the three Northern West Sussex authorities in terms of commuting flows, and collectively these areas act as a net importer of labour drawing from the wider region.

Gatwick Diamond Market Data

Office market

- 2.9 We have reviewed some up to date market data using Co-Star data for the 6 local authorities that make up the core area of the Gatwick diamond, as discussed above
- 2.10 The review of the market data showed some fairly clear distinctions between the 3 Sussex local authorities (Crawley, Mid Sussex and Horsham) and the 3 Surrey local authorities of Mole Valley, Tandridge and Reigate and Banstead.
- 2.11 As shown in Figure 3 and Figure 3 below, office rents and sale prices are generally higher in the Surrey authorities, although rents in Tandridge have only recently surpassed those in Crawley. This is likely due to their relative proximity to London. The distinction between the Sussex and Surrey authorities is clearer when sale prices are considered, as shown in Figure 3. It is also notable that the patterns of change are very similar for the three Sussex and three Surrey authorities.

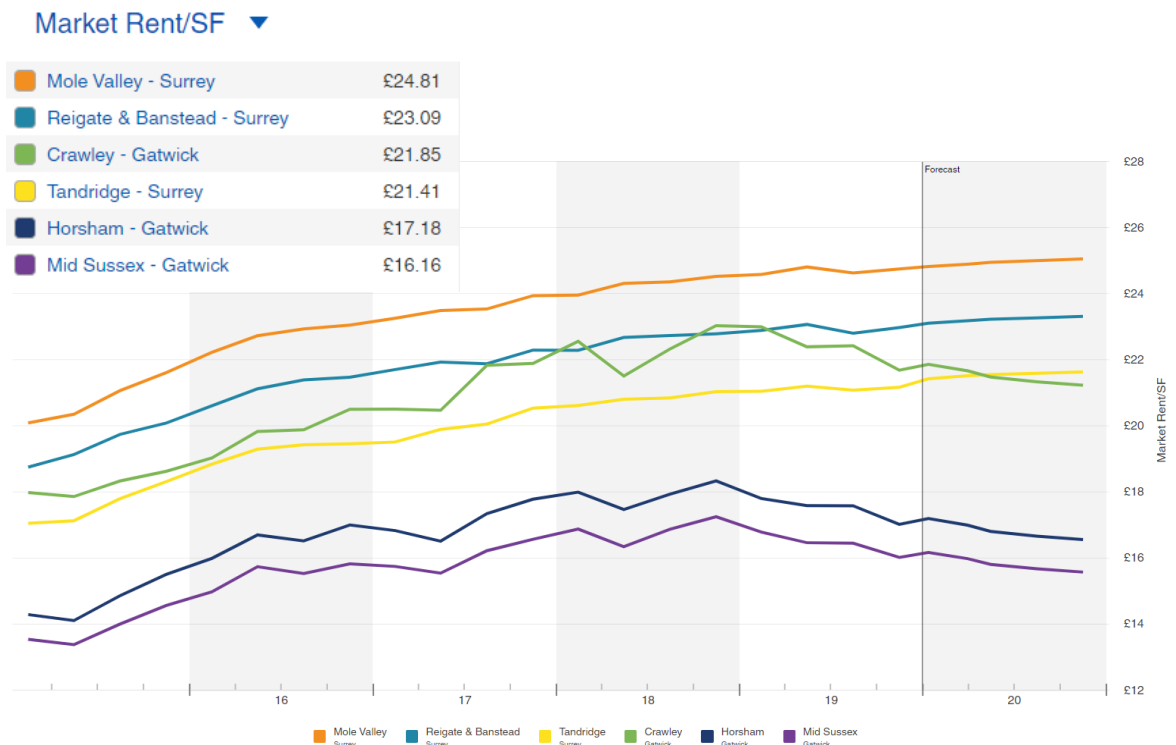


Figure 2 - Office market rents over past 5 years

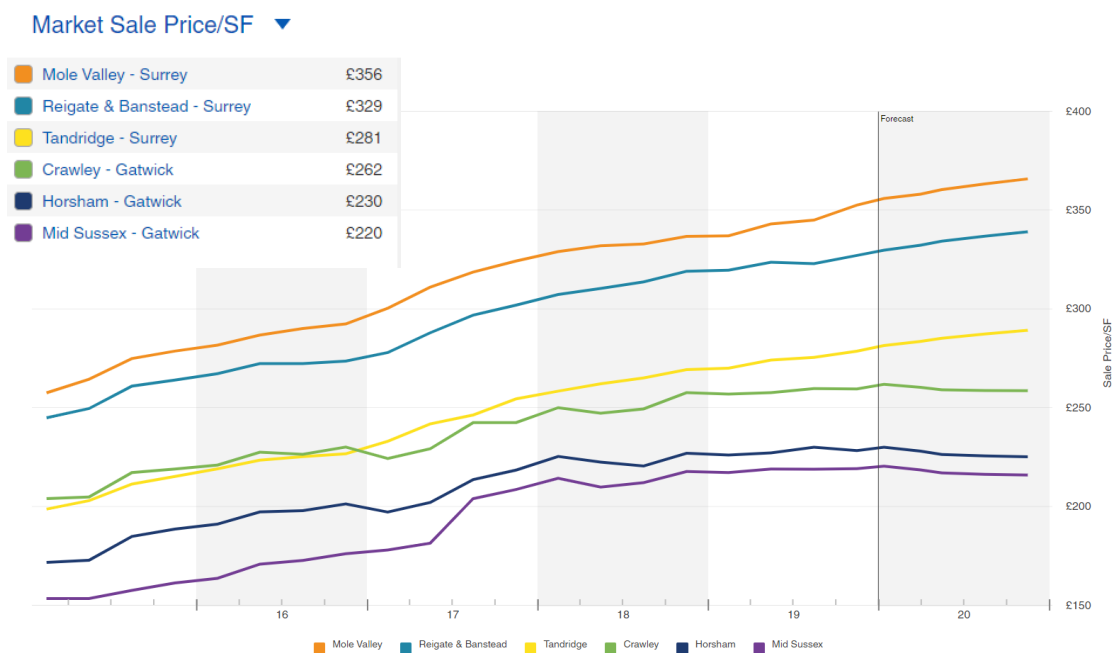


Figure 3 – Office market sales price over past 5 years

2.12 Despite the relatively high cost of office space in Crawley, this area also has the highest vacancy rate of the six authorities. Mole Valley has a vacancy rate (5.5%) that is closest to the rate associated with natural churn in the market (5%), whereas the remaining Councils have very low levels of vacancy, suggesting that there may actually be an under-supply of space in these areas.

2.13 Mid Sussex's vacancy rate of 1.3% suggests that there is need for additional office floorspace due to very low availability in the market at present that has not been much over 4% over the last 5 years.

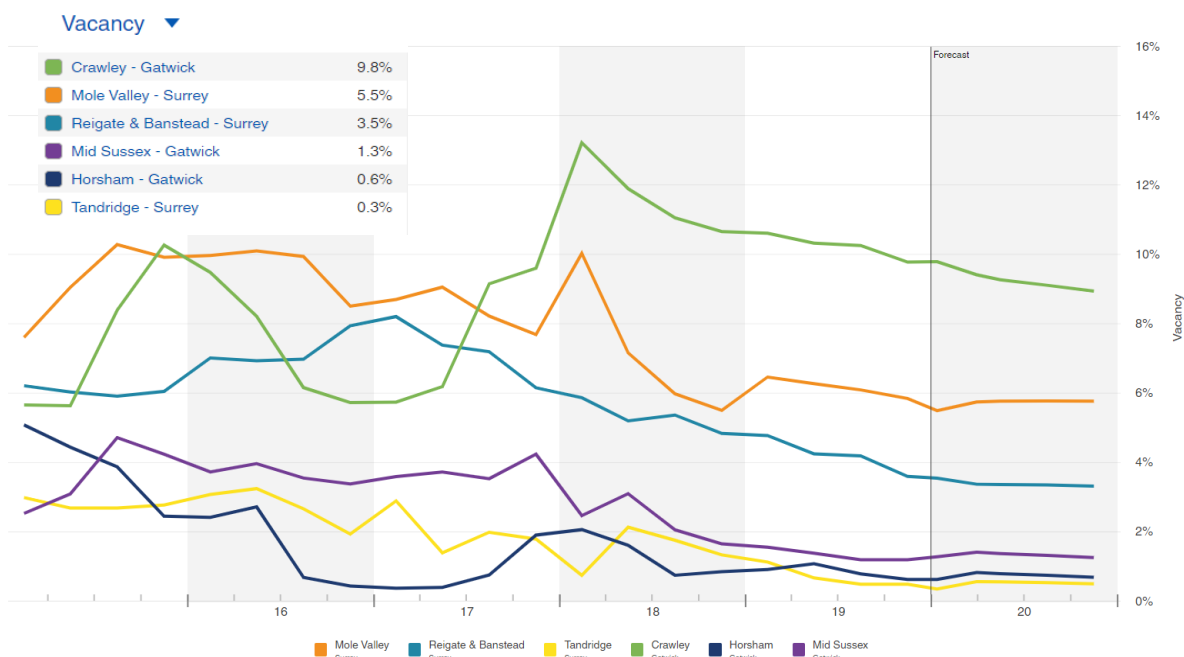
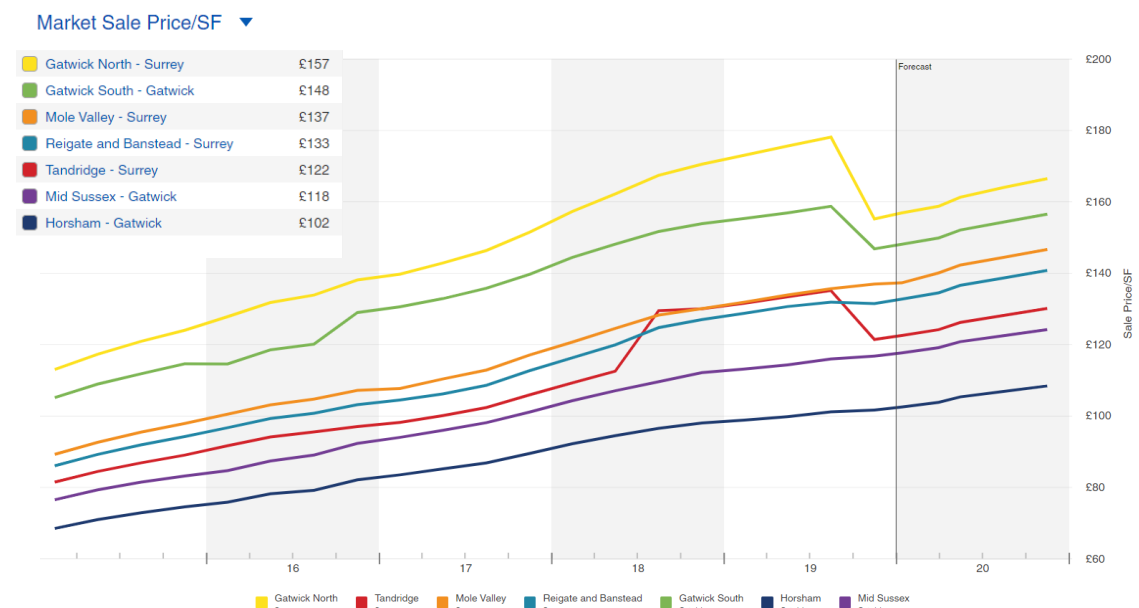
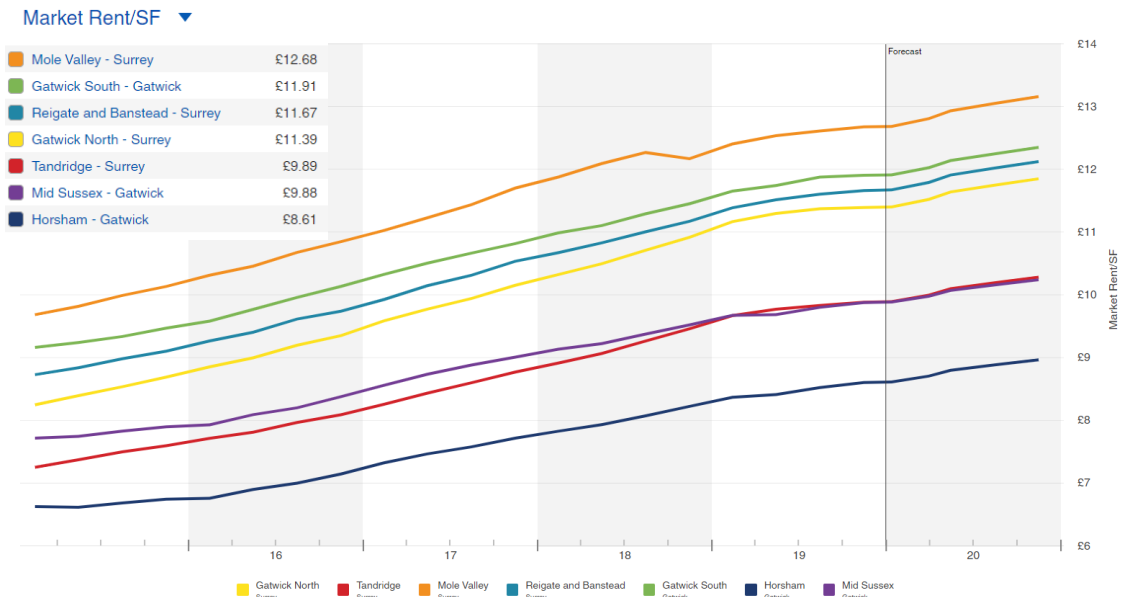


Figure 4 – Office Vacancy over past 5 years

Industrial

2.14 The industrial data is slightly different as Co-Star uses slightly different areas and splits Crawley in to Gatwick North and Gatwick South.



- 2.15 As shown in Figure 5 and Figure 6, there is less of a clear distinction between the Surrey and Sussex authorities in the industrial market. Industrial rents and sale prices are high in Mole Valley, however, this could be due to a substantial reduction in supply which will be discussed further in Chapter 4. However, it is clear that industrial sale prices are highest in Gatwick North and South that is unsurprising given its proximity to the airport.

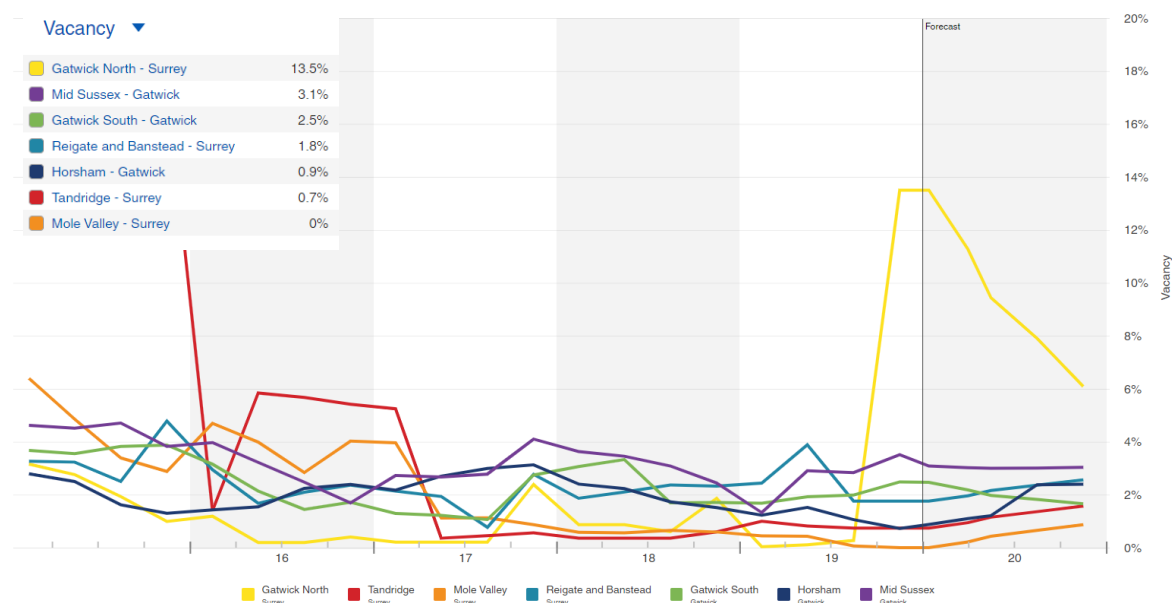


Figure 7 – Industrial Vacancy over past 5 years

- 2.16 The sudden and erratic movements in vacancy for both Tandridge and Gatwick North suggest that they may have experienced a single / small number of large units becoming vacant at the same time, which have caused spikes in the overall rate. All of the other areas have relatively stable (but very low overall) rates of vacancy, suggesting that there is not much spare industrial capacity in the wider region.
- 2.17 Although the rate for Mid Sussex one of the highest at 3.1%, this is still far below the expected level for market churn (5%) and therefore highlights strong demand for industrial floorspace.

Sub –market/FEMA conclusion

- 2.18 We have reviewed the analysis of the sub-region used in the EGA 2014 and 2020 update and conclude that it appears robust and that Northern West Sussex (Crawley, Mid Sussex and Horsham) is an appropriate sub market to consider. Our brief market analysis appears to support this position, particularly in relation to the office market.

However, it is also clear that the Gatwick diamond is an important functional economic market area and therefore the remainder of this analysis will include the six 'core' local authorities of the Gatwick Diamond, but with a particular focus on the North West Sussex sub market.

3. MID SUSSEX EMPLOYMENT EVIDENCE REVIEW

- 3.1 This chapter reviews the Council's published employment need evidence along with relevant sections of local plan documents.
- 3.2 We then review the supply of employment land in Mid Sussex, including completions since 2014 and the most recently published pipeline data to help understand the current supply/demand balance in Mid Sussex district.

Employment Need

Northern West Sussex Economic Growth Assessment (2014)

- 3.3 Mid Sussex, Horsham and Crawley District Councils commissioned consultants NLP (now known as Lichfield's) to produce an Economic Growth Assessment in 2014. The EGA used 2013-based Experian projections as the basis of the employment need assessment.
- 3.4 As set out at paragraphs 5.25-6 of the report, Mid Sussex contained 605,000sqm of B class floorspace in 2008, the latest estimate available at the time. Echoing the trend across the rest of the North West Sussex sub region, Mid Sussex's supply of employment space largely comprises industrial use, with manufacturing and distribution / warehousing accounting for 41% (248,050sqm) and 29% (175,450sqm) of total stock respectively. At 181,000sqm, the commercial office stock in Mid Sussex represented around 30% of all employment space.
- 3.5 The EGA concluded that forecast job growth under the baseline scenario was 10,400 jobs (3,980 B-class) by 2031. The 'higher growth' scenario indicated potential for a further 4,700 jobs. This is shown as floorspace need in the table below:

Table 1 – Mid Sussex Floorspace need identified in EGA 2014 [Table 7.16/Page 129]

Use	Baseline		Higher growth	
	Floorspace (sqm)	Land (ha)	Floorspace (sqm)	Land (ha)
Offices (B1a/b)	63,780	9.6	77,755	11.7
Industrial (B1c/B2/B8)	84,470	21.1	164,320	41.1
All B uses	148,250	30.7	242,080	52.8

- 3.6 The figures above taken from the NLP work include what they describe as a 'modest safety margin' to allow for delays in sites coming forward for development. The employment floorspace need and employment land requirement inclusive of safety margin equated to the need for 148,250sqm (30.7ha) of employment land between 2014 and 2031 taking the baseline position and 242,080sqm (52.8ha) on the higher growth scenario.
- 3.7 In terms of supply, the EGA identified a pipeline of 29.9ha in Mid Sussex. This included undeveloped employment allocations/vacant sites and outstanding planning permissions.

Table 2 – Mid Sussex Pipeline as identified in EGA 2014

	New employment floorspace (ha)			
	Industrial (B1c/B2/B8)	Offices (B1a/b)	Mixed B	Total
Undeveloped employment allocations/vacant sites	16.7	3.4	1.2	21.3
Outstanding planning permissions	4.1	0.9	3.6	8.6
Total	20.8	4.3	4.8	29.9

- 3.8 In terms of supply/demand balance, the EGA concluded that there was therefore a small shortfall of -0.8ha. However, once this is split between office and industrial land it shows a surplus of 2.1ha of industrial and a shortfall of 2.9ha of office floorspace.

Table 3 – Mid Sussex Supply/Demand Balance as identified in EGA 2014

	Employment Floorspace (ha)
Requirement for B Class Space (ha)	30.7
Available Employment Space (ha)	29.9
Surplus (+)/Shortfall (-) (ha)	-0.8

Mid Sussex District Plan 2014 – 2031

- 3.9 The Mid Sussex District Plan was adopted in March 2018. On the need for employment land, the District Plan references the EGA 2014 and states that the baseline assessment suggests an employment land demand figure of approximately 24ha between 2014 and 2031. However, it adds that this is best viewed as a realistic minimum and that a demand figure of 25-30 hectares should be used.

- 3.10 The District Plan also recognises that the extent of unmet employment land needs from neighbouring local authorities in the Gatwick Diamond and wider Coast to Capital LEP area is projected to be significant and there are evident economic and sustainability consequences if an insufficient supply of employment land and floorspace is not secured.
- 3.11 Policy DP1: Sustainable Economic Development includes a commitment to allocated 25ha of land as a high quality business park at Burgess Hill to the east of Cuckfield Road. It also states that it will allocate further sites within the Site Allocations DPD.
- 3.12 The District Plan Inspector found the approach to employment land sound and concluded in his report that there is a substantial existing district-wide supply of such land that, together with that granted planning permission, amounts to over 30ha. This is in excess of that required from most economic forecasts.
- 3.13 However, he went on to note that there is unmet need for employment land in Adur, Brighton and Hove, Crawley and Horsham Districts, and Mid Sussex has the potential for enhanced higher-value economic growth within key growth sectors identified by the Gatwick Diamond and Coast to Capital Local Enterprise Partnership.

Economic Growth Assessment Update 2020

- 3.14 In January 2020, whilst this report was being prepared, an update to the ELA 2014 was published. This was undertaken by Lichfield's and once again includes Mid Sussex, Horsham and Crawley districts.
- 3.15 Mid Sussex is included in the update, however, the EGA 2020 update states that it does not give any consideration to economic growth potential within Mid Sussex. This is because Mid Sussex have already produced their own updated employment projections as part of the Site Allocation Document which is discussed below. The 2020 EGA update does provide updated market demand intelligence and advice on cross boundary implications in terms of accommodating economic growth at a NWS level, in conjunction with Crawley and Horsham which we will return to later in the report.

Site Allocations Development Plan Document

- 3.16 Mid Sussex are currently preparing their Site Allocations Development Plan Document (DPD) which will identify employment sites to meet identified needs up to 2031. The Issues and Options (regulation 18) consultation took place in autumn 2019 and the Pre-Submission Consultation (regulation 19) is currently ongoing (August/September 2020). It is anticipated that it will be adopted in autumn 2021.

- 3.17 As part of the Site Allocations work, the Council commissioned their own updated employment projections to take account of changes in the jobs and employment market. The updated evidence found that there now a need for around 35 to 40ha of employment land to 2031. As 25ha had already been allocated in the Core Strategy, there is now a residual requirement of 10-15ha to be allocated within the Site Allocations Document.
- 3.18 Selection Paper 4: Employment Sites¹ sets out the Council's approach to updating the employment need figures. It uses the same broad approach and methodology as the EGA 2014 but utilises Oxford Economics projections (2018) rather than Experian's that were used in the original EGA. This is not necessarily an issue as both are well-known and reliable sources of data
- 3.19 The updated projections use an amended time period of 2019-2031 which results in the following additional B-Class employment land need above the 25ha identified in the District Plan:

Table 4 – Mid Sussex Updated employment need as identified in Site Allocations Development Plan Document Site Selection Paper 4: Employment Sites²

	Area (ha)
B1: Offices	3.08
B2: Manufacturing	3.69
B8: Storage/Distribution	8.23
Total	15.00

- 3.20 The document also states that 6ha of the original 25ha District Plan allocation can no longer come forward as expected and this now needs to be accounted for elsewhere. However, it goes on to state this 6ha shortfall has been met by two 'windfall' sites were not considered against the 25ha requirement, as they had not been permitted at the time. One of these sites is Land West of Copthorne that includes 3.6ha of employment land, and the other is Former Handcross Garden Centre, Handcross which includes 2.7ha.
- 3.21 Based on this additional requirement, the draft Sites DPD therefore allocates six additional sites for employment use and expansion at Bolney Grange Business Park, totalling approximately 17ha, which would exceed the additional need if all are delivered as expected. The proposed additional sites are listed below:

¹ Site Allocations Development Plan Document Site Selection Paper 4: Employment Sites. September 2019

² See table after paragraph 3.6 in the Site Allocations Development Plan Document Site Selection Paper 4: Employment Sites. September 2019

Table 5 – Proposed additional employment site allocations in draft Site Allocations

Settlement/Parish	Site Name	Policy Reference
Burgess Hill	Burnside Centre, Victoria Road	SA2
	Site of Fomer KDG, Victoria Road	SA3
Copthorne	Land north of the 264 at Junction 10 of M23	SA4
Bolney	Land at Bolney Grange Business Park	SA5
	Maryland Nursery, Cowfold Road	SA6
Pease Pottage	Cedars, Brighotn Road	SA7
	Pease Pottage Nurseries, Brighton Road	SA8

3.22 The Oxford Economic 2018 projections used by Mid Sussex District Council as part of their Site Allocations evidence base, as discussed above, is the most reliable economic forecasts at this time due to this being the primary source of information on which the Council has developed its most up to date (emerging) plan approach to employment land in the area. Continuing to utilise this data ensures a consistent approach, and appears to result in a sufficient supply of land being allocated for development to meet expected future needs

Employment Completions to date

3.23 Mid Sussex have not published an Annual Monitoring Report (AMR) on their website since 2014/15. Therefore, we have requested completions and current pipeline data from West Sussex County Council's monitoring team³ as shown in the table below.

Table 6 – Completions (net) in Mid Sussex⁴

Use Class	Completions 2014-2019 (net)	% of Completions
B1a	7,777	15%
B1b	0	0%
B1c	7,086	14%
B1 (mix unknown)	9,074	18%
B2	3,685	7%
B8	23,571	46%
Total	51,192	100%

³ Note that these findings are reliant on the data provided by West Sussex County Council being accurate.

⁴ Source: West Sussex County Council Monitoring – sent by email

3.24 As shown above, Mid Sussex have completed around 51,200sqm net additional employment floorspace in the 5 years between 2014 and 2019. The majority of this floorspace (46%) was B8 storage and distribution. Including B1c and B2, the total industrial floorspace completed was 34,341sqm (67%). Office completions (B1a) totalled 7,777sqm (15%) however there was also 9,074 (18%) of mixed B1 floorspace where the floorspace breakdown between B1a/b and c is not known.

Employment Pipeline

3.25 Based on West Sussex County Council's monitoring figures, the current pipeline in Mid Sussex is as follows:

Table 7 – Mid Sussex Pipeline as at April 2019⁵

Use Class	Allocated	Under Construction	Permissions	Total
B1a	0	-2,157	8,541	6,384
B1b	0	0	5,000	5,000
B1c	5,200	9,214	7,626	22,040
B1	0	4,999	0	4,999
B2	0	-4,640	21,281	16,641
B8	0	1,406	26,871	28,277
Total	5,200	8,822	69,319	83,341

3.26 These figures show there is currently a pipeline of around 83,300sqm of employment land in Mid Sussex. In addition to the above, there is approximately 24,000sqm of allocated employment floorspace at Land South of A2300, Burgess Hill that was not included in the County Council Monitoring statistics. The breakdown of this floorspace is not yet known however if it is included the total amount of employment floorspace in the pipeline is around 107,000sqm.

3.27 Unfortunately it is not possible to use land (hectares) figures from the County Council monitoring as it appears that the data includes whole site figures not just the employment element and is therefore not accurate.

Supply/Demand Balance

3.28 We concluded that the work undertaken by Mid Sussex for the EGA 2014 and the recent update using Oxford Economic projections are robust and appropriate to use. These projections suggested an initial need for around 30ha (148,250sqm) of employment floorspace and then an updated need for an additional 10-15ha which equated to around 159,700sqm between 2019 and 2031.

⁵ Source: West Sussex County Council Monitoring – sent by email

- 3.29 However, Mid Sussex did not fully participate in the EGA update 2019 which ran a number of additional scenarios on past trends and labour supply therefore it is not known how this would impact need.
- 3.30 In terms of supply, Mid Sussex have a pipeline of around 107,000sqm that would leave a shortfall of around 52,700sqm by 2031. However, Mid Sussex have identified seven new sites in their site allocations document to meet this need. Unfortunately, they do not provide floorspace estimates however based on land estimates (ha), it would appear if these sites come forward as anticipated, Mid Sussex would be able to meet their own employment needs.

4. OTHER LOCAL AUTHORITIES IN SUB-REGION EMPLOYMENT EVIDENCE REVIEW

Crawley

Employment Need - Economic Growth Assessment 2014

4.1 Crawley District Council's most recently published evidence on employment need is also the Northern West Sussex Economic Growth Assessment (2014) carried out by NLP (now known as Lichfield's) as discussed above.

4.2 The EGA 2014 concluded on the following employment need figures for Crawley:

Table 8 – Crawley employment need as set out in EGA 2014

Use	Baseline		Higher growth	
	Floorspace (sqm)	Land (ha)	Floorspace (sqm)	Land (ha)
Offices (B1a/b)	197,200	29.6	212,620	31.9
Industrial (B1c / B2 / B8)	190,330	47.6	222,680	55.7
All B uses	387,540	77.2	435,300	87.6

4.3 Based on the EGA 2014, there was a need for 77.2ha of employment land by 2031 under the baseline scenario. This increased to 87.6ha in the higher growth scenario.

Employment Need - Economic Growth Assessment Update 2020

4.4 The 2020 EGA update provides a greater number scenarios including labour demand, past trends and labour supply. The EGA update covers the period 2019-2036. The results of the various scenarios are summarised below:

Table 9 - Crawley employment need as set out in EGA 2020

Use	1. Baseline Growth		2. Past Development Rates		3. Baseline Labour Supply	
	Floorspace (sqm)	Land (ha)	Floorspace (sqm)	Land (ha)	Floorspace (sqm)	Land (ha)
Offices (B1a/b)	37,280	5.6	29,920	4.5	59,525	8.9
Manufacturing (B1c/B2)	-24,065	-6.0	114,070	28.5	76,990	19.2
Distribution (B8)	-2,855	-0.7	143,990		339,685	84.9
All B uses	10,360	-1.1	143,990	33.0	476,200	113.0

- 4.5 The labour demand scenario uses economic projections from Oxford Economics (Q4 2018). The scale of growth suggested by the latest projections is considerably lower than the projected growth identified in the EGA 2014, which used Experian 2013 data. The EGA 2020 states that OE forecasts reflect the current post-recession economic climate and assume a slowdown in economic activity due to Brexit-related uncertainties and rising inflation affecting consumer and investment spending.
- 4.6 The past development rates scenario simply assumes that future need will match past completions. Based on this scenario the need in Crawley is around 144,000sqm with much higher requirements for industrial uses suggested in the baseline growth scenario.
- 4.7 The labour demand scenario suggests the highest growth of all at 476,000sqm that is higher than the 2014 EGA figures. This scenario is based on the labour supply generated from an 'uncapped' housing need figure 752 dwellings per year for Crawley. The EGA states that the comparatively higher resulting workplace labour supply in Crawley reflects current commuting patterns, and the Borough's existing role as a net importer of labour.
- 4.8 In terms of which scenario to plan for, the EGA states that the baseline job growth scenario does not appear to be particularly optimistic and is unlikely to provide an effective and positive basis for planning for local economic growth. It lies significantly lower than past job growth performance in Crawley and does not align with the more qualitative market intelligence captured in terms of drivers of demand.
- 4.9 The labour demand scenario implies a more significant scale of local labour supply however is based on uncapped' local housing need for each authority resulting from the Standard Method approach to calculating housing need. It states that this represents the 'starting point' for the purposes of each Local Plan, and adjustments will likely be made to these figures to reflect spatial capacity for accommodating new housing development.

Local Plan Review 2020

- 4.10 Crawley began public consultation on their draft revised Local Plan (Regulation 19 stage) on 20th January 2020. The new Local Plan will cover the period 2020 to 2035.
- 4.11 The draft Local Plan states that based on a continuation of past development rates, which is based on Crawley's constrained land supply position, there is need for a total of 33 hectares (143,990sqm floorspace) of employment land in Crawley over the Plan period. This represents Scenario 2 (past trends) as discussed above.
- 4.12 It also states that there is potential for a greater level of business growth in Crawley, though this can only be planned for if current constraints on land supply were to be lifted. The Baseline Labour Supply, which uses Crawley's 'uncapped' housing need figure of 752 dwellings per annum, identifies a projected B-class business land requirement of 113ha (476,200sqm) over the Plan period.

*Employment Supply**Table 10 – Employment completions in Crawley 2014-2019⁶*

Use Class	Completions sqm 2014-2019 (net)	% of Completions
B1a	42,872	54%
B1b	1,683	2%
B1c	9,493	12%
B1 (mix unknown)	0	0%
B2	-3,926	-5%
B8	29,151	37%
Total	79,273	100%

- 4.13 Between 2014 and 2019, Crawley completed just under 80,000sqm (net) employment floorspace. The majority of the completed floorspace was office use (B1a/b) at 56%. There was a small loss of B2 floorspace (-3,926sqm). Overall, there was a gain of industrial floorspace (B1c and B8) of around 38,600sqm.
- 4.14 In terms of pipeline, the EGA 2020 states that following a 'call for sites' exercise as part of the Local Plan Reg. 18 consultation, CBC identifies a total of 11.53 ha employment land supply within the Borough. This includes 8.61ha of office and 2.92ha of industrial; unfortunately, these figures are not given in square metres. The West Sussex County Council monitoring data suggests a pipeline of around 87,000sqm however it is not clear if this includes the sites identified in the call for sites exercise, as it seems to only include allocations and planning permissions.

⁶ Source: Source: West Sussex County Council Monitoring – sent by email

Supply/Demand Balance

4.15 Based on the EGA 2020, the supply demand balance is summarised in the table below.

Table 11 – Crawley Supply/Demand Balance as set out in EGA 2020 (note figures only available in hectares)

	1. Baseline Job Growth	2. Past Development Rates	3. Baseline Labour Supply
Requirement for B Class Space (ha)	-1.1	33.0	113.0
Available Employment Space (ha)	11.5		
Surplus/Shortfall (ha)	+12.6	-21.5	-101.5

4.16 As the baseline job growth scenario has been discounted, there is an identified shortfall of between 21.5 and 101.5 ha of employment land in Crawley. Crawley Borough Council are planning for the past development rate figure (-21.5ha) as a minimum however it is likely that they will need to provide more based on their eventual housing target. The figure shown above under scenario 3 is based on Crawley's uncapped housing need figure of 752 dwellings per year. The local plan review is still at an early stage but according to draft documents for the regulation 18 consultation it is likely that around 50% of Crawley's housing need will need to be met within neighbouring districts.

4.17 The EGA suggests a number of solutions to meeting the subsequent employment shortfall, one of which includes meeting need in other districts including Mid Sussex, Horsham and Reigate and Banstead.

Horsham

Employment Need – EGA 2014

4.18 Horsham District Council were also included in the North West Sussex EGA 2014 and subsequent update.

4.19 The EGA 2014 concluded on the following employment need figures for Horsham:

Table 12 – Horsham employment need as identified in the EGA 2014

Use	Baseline		Higher growth	
	Floorspace (sqm)	Land (ha)	Floorspace (sqm)	Land (ha)
Offices (B1a/b)	69,420	9.0	93,630	12.2
Industrial (B1c / B2 / B8)	109,350	27.3	125,000	31.2
All B uses	178,770	36.3	218,630	43.4

- 4.20 Based on the EGA 2014, there was a need for 36.3ha of employment land by 2031 under the baseline scenario. This increased to 43.4ha in the higher growth scenario.
- 4.21 Horsham commissioned an update to the EGA in 2015, which was also carried out by NLP. The Supplementary report included an alternative 'labour supply' scenario based on an assumed housing target of 750 dwellings per annum. Under the labour supply scenario, the overall space requirement equated to 185,160m² or 38.1ha for all types of B class employment space up to 2031.

Employment Need - Economic Growth Assessment Update 2020

- 4.22 The 2020 EGA update provides an even greater number scenarios including labour demand, past trends and three different labour supply scenarios. The labour demand scenarios include the housing need based on the standard method and two scenarios that explore the option of taking on additional unmet need housing need from other areas, namely Crawley. The EGA update covers the period 2019-2036. The results of the various scenarios are summarised below:

Table 13 - Horsham employment need as set out in EGA 2020

Use	1. Baseline Growth		2. Past Development Rates		3. Baseline Labour Supply		4. Alternative Labour Supply (med)		5. Alternative Labour Supply (high)	
	Firspce (sqm)	Land (ha)	Firspce (sqm)	Land (ha)	Firspce (sqm)	Land (ha)	Firspce (sqm)	Land (ha)	Firspce (sqm)	Land (ha)
Offices (B1a/b)	24,870	3.2	-2,890	-0.4	33,785	4.4	48,745	6.3	61,475	8.0
Manufacturing (B1c/B2)	-7,850	-2.0	130,530	32.6	54,180	13.5	78,160	19.5	98,570	24.6
Distribution (B8)	28,565	7.1			69,745	17.4	100,620	25.2	126,895	31.7
Mixed B1	n/a	n/a	27,300	6.8	n/a	n/a	n/a	n/a	n/a	n/a
All B uses	45,585	8.3	154,940	39.0	157,710	35.3	227,525	51.0	286,940	64.3

- 4.23 As for Crawley, the labour demand scenario uses economic projections from Oxford Economics (Q4 2018) and once again, the scale of growth suggested by the latest projections is lower than the projected growth identified in the EGA 2014. Based on this scenario there is a need for around 45,600sqm of employment floorspace
- 4.24 The past development rates scenario simply assumes that future need will match past completions. Based on this scenario the need in Horsham is around 154,000sqm that is considerably higher than the baseline growth scenario.

- 4.25 Horsham have included three labour supply scenarios based on different potential housing targets. Based on Horsham's uncapped housing need of 965 dwellings per annum (calculated using the standard method) there is a need for around 158,000sqm of employment floorspace. Two alternative scenarios have been produced which consider the impact of Horsham providing additional housing growth at 1,200dpa and 1,400 dpa. These scenarios are included to help inform Duty to Cooperate discussions around the distribution of housing need across the market area, particularly from Crawley. Based on 1,200 dpa the employment floorspace need increases to around 227,500 and based on 1,400 dpa it increases to around 287,000.
- 4.26 The EGA states that the gap between the various scenarios is smaller, and the baseline job growth requirement appears to be conservative considering levels of employment space take-up that have occurred in recent years. The scale of requirement implied by the past take-up and baseline labour supply scenarios (i.e. between 35 and 39 ha) represents a more robust and aspirational scenario to plan for,

Employment Supply

Table 14 – Employment completions in Horsham 2014-2019⁷

Use Class	Completions 2014-2019 (net)	% of Completions
B1a	453	1%
B1b	0	0%
B1c	3,999	6%
B1 (mix unknown)	9,846	16%
B2	10,209	17%
B8	37,336	60%
Total	61,844	100%

- 4.27 Between 2014 and 2019, Horsham completed around 62,000 (net) employment floorspace. The majority of the completed floorspace was B8 (storage and distribution) at 60%. In total, there was 51,544sqm (83%) of industrial floorspace B1c/B2/B8.
- 4.28 In terms of pipeline, the EGA 2020 provides the most up to date figures on supply. This shows that there is currently a pipeline of 157,950sqm in Horsham. This is shown by use class in the table below.

Use Class	Pipeline (sqm)
B1a/b (Office)	49,810
Industrial (B1c/B2)	34,090
Warehousing (B8)	30,375
Mixed B1	43,710

⁷ Source: West Sussex County Council Monitoring – sent by email

Use Class	Pipeline (sqm)
Total	157,980

Supply/Demand Balance

4.29 Based on the EGA 2020, the supply demand balance is summarised in the table below.

	1. Baseline Job Growth	2. Past Development Rates	3. Baseline Labour Supply	4. Alternative Labour Supply (med)	5. Alternative Labour Supply (high)
Requirement for B Class Space (sqm)	45,585	154,940	157,710	227,525	286,940
Available Employment Space (sqm)	157,980				
Surplus/Shortfall (sqm)	+112,395	+3,040	+270	-69,545	-128,960

4.30 Based on the above, Horsham have sufficient land supply to meet their needs under scenarios 1, 2 and 3. For scenario 3 that is based on Horsham meeting their own housing need there is a very small surplus of just 270sqm. Under scenarios 4 and 5, which involve Horsham taking some of the housing need of others, namely Crawley, there is not currently a sufficient supply to meet needs under the labour supply scenarios.

Mole Valley*Employment Need*

4.31 The main published economic study that forms part of the Council's evidence base is the Economic Development Needs Assessment (2017).

4.32 As set out at paragraph 7.1 of the report, Mole Valley contained a total commercial floorspace of approximately 480,500sqm, with offices accounting for 259,800sqm, industrial at 103,700sqm and warehouses at 117,000sqm. The supply of employment floorspace in Mole Valley is therefore dominated by office uses that account for 54% of the total, with industrial and warehousing accounting for 22% and 24% respectively.

4.33 In terms of employment need, the net B-class requirement is for -48,808sqm (equivalent to 36.3ha) by 2033 under the forecast jobs growth scenario, the majority of which relates to industrial (B1c/B2) uses. These figures are set out in table 8.10 in the report (see p.p.77-78) which has been reproduced below.

Table 15 - Summary of Floorspace Needs (sqm) as a result of a forecast growth in employment - All Class B uses⁸

	2016-2021 total (sqm)	2016-2026 total (sqm)	2016-2031 total (sqm)
Class B1a / Unrestricted B1	-23,098	-17,098	-7,498
Class B1c - B2	-11,431	-19,831	-28,231
Class B8	-3,492	-3,492	-10,492
Total	-40,608	-43,008	-48,808

Employment Supply

4.34 Monitoring information from the AMRs shows that since 2016/17 there have been losses of all types of employment floorspace totalling 16,529sqm. The majority of this has been office floorspace at -13,668sqm.

Table 16 – Employment completions in Mole Valley⁹

	B1a	B1b	B1c	B1	B2	B8	Total
2017	-2,003	0	-517	0	-730	0	-3,250
2018	-11,665	-1,316	-264	0	19	-53	-13,279
2019	0	0	0	0	0	0	0
Total	-13,668	-1,316	- 781	0	-711	-53	-16,529

4.35 In terms of pipeline, the most recent AMR shows that there is a negative pipeline of -18,217sqm.

Table 17 – Employment pipeline in Mole Valley⁹

	Allocated	Under Construction	Permissions	Total
B1a	0	0	-18,527	-18,527
B1b	0	0	0	0
B1c	0	0	-53	-53
B1	0	0	0	0
B2	0	0	-1,189	-1,189
B8	0	0	1,552	1,552
Total	0	0	-18,217	-18,217

⁸ [Economic Development Needs Assessment](#) (2017)

⁹ As set out in Mole Valley [AMR 2017/18](#)

Supply/Demand Balance

4.36 As set out above, based on the most recently published evidence there is a negative requirement for employment floorspace in Mole Valley along with negative completions and a negative pipeline of supply. Based on the need assessment of - 48,800sqm, it can be expected that this trend will continue as only 34,700sqm has been lost to date, however, it seems that Mole Valley has already lost more office floorspace than projected.

Reigate and Banstead*Employment Need*

4.37 Reigate and Banstead's employment evidence is somewhat confusing and difficult to locate on their website. The most recent assessment of need appears to be the Reigate & Banstead Borough Council HOR9 Strategic Employment Site: Economic Assessment (September 2017).

4.38 This document is primarily an assessment of a single site (Horley Business Park HOR9) however does include a detailed assessment of overall need in Reigate and Banstead. The document concludes that there is need for between 183,200 to 213,640sqm of B Use Class floorspace up to 2035. This consists of:

- 66,442–80,885sqm strategic local need within Reigate & Banstead;
- 106,757sqm unmet need arising from Crawley Borough; and
- 10,000–26,000sqm FDI/Relocation demand potential.

Employment Supply

Table 18 – Reigate and Banstead Commercial Development Monitor 2018/19¹⁰

	B1a	B1b	B1c	B1	B2	B8	Total
2018	-13,009	0	0	0	0	-1353	-14,362
2019	-593	0	34	0	-2223	-230	-3,012
Total	-13,602	0	34	0	-2,223	-1,583	-17,374

4.39 According to AMR data, there has been losses of 17,374sqm employment floorspace since 2017 when the assessment was made.

4.40 In terms of pipeline, the most recently published AMR shows a pipeline of 36,347sqm of employment floorspace. This includes 46,000sqm of allocated floorspace, however, the district is also experiencing large losses of employment space, particularly office floorspace. The AMR notes that this is largely due to the changes to permitted development that allow change of use from employment to residential.

¹⁰ Reigate and Banstead [Commercial Development Monitor](#)

Table 19 – Reigate and Banstead Commercial Development Monitor 2018/19

Net	Allocated	Under Construction	Permissions	Total
B1a	0	0	-15,254	-15,254
B1b	0	0	3,313	3,313
B1c	0	0	-1,167	-1,167
B1	0	0	0	0
B2	0	0	-2,136	-2,136
B8	0	0	5,591	5,591
B use	46,000	0	0	46,000
Total	46,000	0	-9,653	36,347

Supply/Demand Balance

- 4.41 According to the Reigate & Banstead Borough Council HOR9 Strategic Employment Site: Economic Assessment there is a need for 66,442–80,885sqm “strategic local need” within Reigate and Banstead. Based on a supply of 36,400, this leaves a shortfall of between 30,042 to 44,485sqm of employment floorspace.
- 4.42 However, this potentially increases to 146,800sqm to 177,240sqm if other factors, such as unmet need in Crawley are taken into account.

Tandridge*Employment Need*

- 4.43 The main published economic study that forms part of the Council's evidence base is the Tandridge Economic Needs Assessment Update (2017) which was undertaken by consultants GL Hearn.
- 4.44 As set out at paragraphs 3.11 and 3.23 of the report, Tandridge contained 55,000sqm of office and 198,000sqm of industrial floorspace in 2016 (based on VOA data).
- 4.45 In terms of employment need, the report sets out that the requirement is for 58,000sqm (equivalent to 15.3ha) by 2033 under the baseline scenario, which is primarily evenly split between B1 and B8 uses. These figures are set out in Table 10 in the report (see p.50) which has been reproduced below.

Table 20 – Employment Need in Tandridge Economic Needs Assessment Update 2017¹¹

	Sqm	Ha
B1a/b: Office	27,000	8.6
B1c/B2: Industrial	8,000	2.0
B8: Warehouse / Distribution	23,000	4.7
Total B-Class Uses	58,000	15.3

¹¹ [Tandridge Economic Needs Assessment Update](#) (2017).

Employment Supply

4.46 Since the Economic Needs Assessment in 2017 Tandridge has completed very little floorspace at just 445sqm.

Table 21 – Tandridge completions 2018-2019 ¹²

Net	B1a	B1b	B1c	B1	B2	B8	B use	Total
2018	0	0	0	0	0	0	570	570
2019	0	0	0	0	0	0	-125	-125
Total	0	0	0	0	0	0	445	445

4.47 In terms of pipeline, Tandridge do not appear to have published detailed figures. However, they are proposing to allocate around 21ha of employment land in their emerging Local Plan. These sites are not yet identified and the Local Plan has recently been through Examination but is not yet adopted.

Supply/Demand Balance

4.48 Based on the figures shown above, if the 21ha proposed in the emerging Local Plan is adopted Tandridge will have a small surplus of employment land (.5.7ha). However, as noted above the new Local Plan is not yet adopted. Regardless, this small surplus would be unlikely to have any significant impact upon Crawley due to none of its identified strategic employment sites being in close proximity to Crawley Borough.

¹² [Council's latest published AMR 2018/19](#)

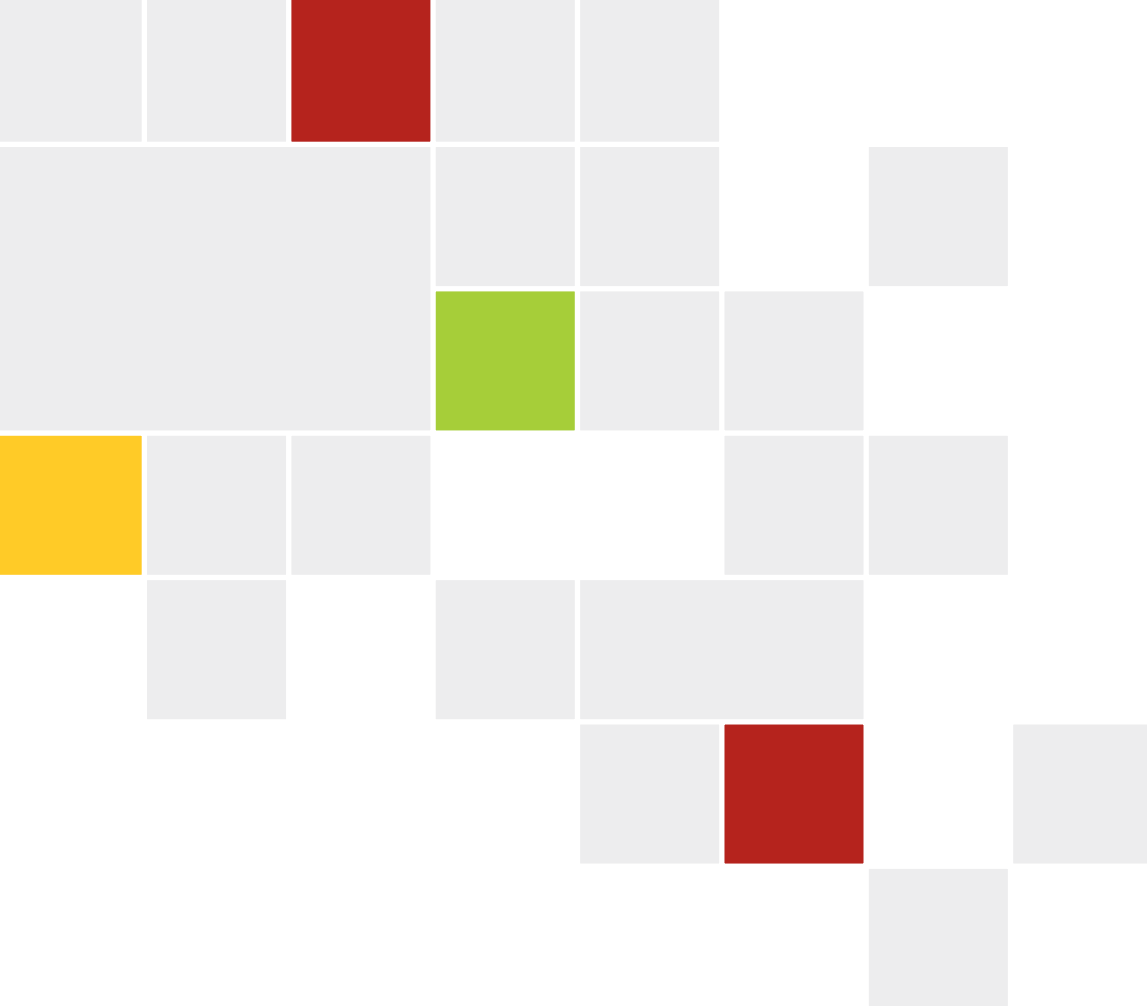
5. CONCLUSION

- 5.1 This report has reviewed employment supply/demand balance in the 'core' Gatwick Diamond area. This includes the local authorities of Mid Sussex, Crawley, Horsham, Mole Valley, Tandridge and Reigate and Banstead.
- 5.2 The table below provides a summary of our findings in relation to the supply/demand balance for those authorities.

	Overall Assessment	Approx Shortfall
Mid Sussex	Broadly Meeting Need	Subject to new allocations in the site allocations document
Crawley	Shortfall	Shortfall range between -21.5ha and -101.5ha
Horsham	Broadly Meeting Need	Can broadly meet own need but shortfall if some of Crawley's housing need included
Mole Valley	Surplus	Negative requirement for employment floorspace but also negative pipeline.
Reigate & Banstead	Shortfall	30,000 - 44,500sqm
Tandridge	Surplus*	*Based on sites in emerging local plan being delivered.

- 5.3 Mid Sussex is expected to broadly meet its assessed need as discussed in Chapter 3. However, Mid Sussex were not included in the EGA update 2020 and chose to undertake their own projections based on Oxford Economics projections. This aligns with the methodology used in Scenario 1 of the EGA however Mid Sussex have not run scenarios based on past trends or labour supply as per Scenarios 2 and 3 of the EGA update and therefore it is unknown how these would impact need.
- 5.4 The Oxford Economic based projections were largely rejected for Crawley and Horsham in the EGA 2020 for being overly pessimistic about future growth. However for Mid Sussex the latest OE projections are more positive and indicate a need for a further 10-15ha of employment land. This is in addition to the 25ha need previously identified and allocated in the Local Plan 2018.
- 5.5 Mid Sussex would be able to meet this additional need but to do so are reliant on the delivery of several proposed sites set out within the draft Site Allocations DPD. Should these draft allocated sites not be delivered or only part delivered, Mid Sussex would have a shortfall.

- 5.6 Additionally, it should be recognised that Mid Sussex are currently not taking into account the shortfall from the other local authorities in the Gatwick Diamond, particularly Crawley which is also within the North West Sussex sub area and therefore has particularly strong economic links to Mid Sussex.
- 5.7 Crawley identifies a shortfall of between 21.5 and 101.5 ha depending on the scenario used. We consider that the 21.5 ha shortfall, which is based on the past trends scenario, is likely to under represent true need as it is constrained by past delivery. However, even this lower estimate represents a substantial shortfall that will need to be provided elsewhere.
- 5.8 Reigate and Banstead also identify a shortfall. The shortfall figures shown in the summary table above only include Reigate and Banstead however they do acknowledge that their shortfall is even greater if they include some of the unmet need from Crawley. It is not clear whether they will be able to accommodate their own need or indeed any of the unmet need from Crawley. It is very unlikely that they would be able to accommodate Crawley's full-unconstrained need.
- 5.9 With regard to other authorities analysed in this note, there are surpluses of employment land in Mole Valley and Tandridge. In Mole Valley, this is due to a negative requirement for employment, coupled with a negative pipeline. In Tandridge there is a small surplus of around 5-6ha which is reliant on sites not yet allocated being delivered as planned. We do not anticipate either of these Districts accommodating anything like Crawley's full-unmet need.
- 5.10 The Inspector for the Mid Sussex Core Strategy came to a similar conclusion in 2018 and noted that whilst Mid Sussex had a substantial existing district wide supply, there was unmet need for employment land in Adur, Brighton and Hove, Crawley and Horsham Districts. Mid Sussex has the potential for enhanced higher-value economic growth within key growth sectors identified by the Gatwick Diamond and Coast to Capital Local Enterprise Partnership.
- 5.11 This report has not included Adur or Brighton and Hove however, given the shortfall of land in Crawley alone, it is clear that there is a strong case for further employment land to be provided on suitable sites within Mid Sussex to help and accommodate some of this sub-regional need.
- 5.12 It is also worth noting that the employment projections used the EGA 2020 (Q4 2018) were based at a time of great political and economic uncertainty. It is possible that some greater political and economic certainty will emerge following the UK's full and final exit from the EU and that future employment projections will become more optimistic again.



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Industrial Market Report

Terence O'Rourke on behalf of St Modwen Developments Limited

Representations in support of Allocation SA4 - Land North of the A264 at Junction 10 of the M23

September 2020

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1. Introduction

- 1.1. This report provides an overview of the industrial property market relevant to Allocation SA4 - Land North of the A264 at Junction 10 of the M23.
- 1.2. The report forms part of the evidence base referred to by representations made by Terence O'Rourke on behalf of St Modwen's Developments Limited (SMDL) in support of development of Allocation SA4 and land in the vicinity of St Modwen Park, Gatwick (the marketing name for the first two phases of this development scheme). The focus of the report is **market** based. Evidence on the **need** for employment land in this location, to meet the needs of both Mid Sussex and Crawley (the adjacent local planning authority to the west of the M23), is provided in a separate, but complementary report, by Boyer Planning.
- 1.3. The report considers both demand and supply of the allocated site's relevant market area. Section 2 looks at demand. This includes data on take up, development and enquiries received. Section 3 considers supply, both in terms of modern available premises and the pipeline of supply. In addition, the report assesses market signals such as rents and land values.
- 1.4. The report concludes that, despite the recent impact of Covid-19 and Brexit, the market is still buoyant with market confidence high. Demand outstrips supply, with this manifestly shown by developers, including SMDL, committing still to speculative development. There is a manifest shortfall of development land, which Allocation SA4 will help to meet.

SMDL

- 1.5. St Modwen specialise in the development of industrial and logistic buildings across the UK. Earlier this month, it launched its latest plans for this sector of the market. It is looking to deliver 1.5 million sq ft of high quality industrial floorspace in the UK in 2021.

JLL

- 1.6. JLL is the biggest property agent in the UK and is particularly well known for its expertise and experience in the industrial and logistics market. It produces a number of research reports on different sectors of the market which are respected monitors for the industry.
- 1.7. JLL is an active agent in the sub-region in terms of industrial premises and development sites. Current instructions include: -
 - Valor Park, Gatwick 30
 - Unit A, Woolborough Lane, Crawley
 - Midpoint 23, Pease Pottage
 - Horley Business Park.

2. Demand Profile for Industrial Property

Market Overview

- 2.1. The site is located at Junction 10 of the M23. As such, whilst it is situated in Mid Sussex District, it is perceived by the market to form part of the Gatwick and Crawley market area. It is this market area that this report concentrates on.
- 2.2. The Gatwick and Crawley market area is the largest and dominant commercial centre in the sub-region. Its advantages include: -
 - Central location within the wider south east.
 - Excellent transport links and connectivity.
 - Access to a large and highly skilled workforce.
 - Strong quality of life factors.
- 2.3. These attributes have attracted a number of key sectors over time. These include: -
 - Aviation
 - Defence
 - Pharmaceutical
 - Logistics.
- 2.4. Proximity to Gatwick Airport has represented an important locational factor for some businesses. However, the airport does not have a substantial freight forwarding function, compared to say Heathrow, and accounts for a reduced share of market activity – between 5% to 10% according to the North West Sussex EGA Update: Final Report 2020 (Lichfields). Partly, this is because of the extent of Crawley's growth and the resulting expansion and diversification of its economic base over the last 25 years.
- 2.5. Since the economy recovered from the recession of 2008-2011, the Gatwick and Crawley market has been particularly buoyant. Activity levels – such as take up and development – are considered in greater detail below. In addition, the next section considers other market signals such as increases in rents and land values.
- 2.6. Pre the Covid-19 crisis, demand levels for modern and new industrial premises remained healthy. Take up and enquiry levels have understandably reduced since lockdown in late March. However, our agents still report reasonable market activity, particularly for enquiries supported by online trading and e-commerce. In addition, developers are still seeking development opportunities.
- 2.7. Post Covid-19, the market is uncertain, particularly in the short term. The resulting recession will have a severe impact on demand from certain sectors of industry (e.g. advance manufacturing). However, we anticipate growth in other sectors, particularly: -
 - Retailers growing their online function (particularly grocery)
 - Logistics companies
 - Parcel delivery operators
 - Food processing

■ Pharmaceutical.

- 2.8. In the medium term, we consider that as a consequence of the Covid-19 pandemic crisis, there could be greater “re-shoring” and increased sourcing of goods and raw materials closer to the market at the point of consumption, in order to reduce supply chain risks. This may also lead to companies holding more buffer stock (i.e. inventory) to cover for elevated supply chain risks and uncertainties. These implications could be compounded by Brexit, if this results in in-bound UK supply chains becoming less productive or slower, due to border issues.
- 2.9. In summary, the market fundamentals pre Covid-19 for Gatwick and Crawley were strong. There was healthy demand and limited supply of both modern premises and developable land catering for this sector. Despite the uncertainty caused by Covid-19 and Brexit, we consider the market for new industrial floor space in this location will be resilient.

Demand Profile

- 2.10. Gatwick and Crawley’s location, excellent communications, and highly skilled and accessible labour force, make the area very attractive for occupiers. When good quality, modern industrial and warehousing space come to the market, it has proved popular with occupiers.
- 2.11. Table 1 provides details of the principal letting transactions over the last three years. The more recent transactions are listed first.

Table 1: Principal Letting Transactions in Gatwick and Crawley over the last three years

Scheme	Date	Grade	Size (sq ft)	Rent (£psf)	Term	Tenant
North Gatwick Gateway, Horley	Under Offer	New	42,524	Confidential	Confidential	Amazon
Sterling Park, Manor Royal	Q2 2020	Secondhand	65,000	£12.50	20 years	New Rest
St Modwen Park, Gatwick, Junction 10 M23	Q1 2020	New	100,008	£13.25	15 years	Gatwick Airport Limited
Unit 2, Space Gatwick	Q1 2020	New	46,300	£10.78	3 years annual breaks	Yusen Logistics
Unit 1, Space Gatwick	Q4 2019	New	37,405	Confidential	5 years	Amazon
North Gateway, Gatwick, Horley	Q4 2019	New	49,887	£12.50 - £13.75	5 years	Brymec
The Warehouse, Faraday Road	Q3 2019	Secondhand	23,500	£12.00	10 years with break at 5	Transvalair
Unit 1, Centron, Compton Way	Q2 2019	New	20,136	£13.75	15 years with break at 10	Mel Components
Diamond Point, Crawley	Q3 2018	Secondhand	114,710	£10.25	15 years	CAE
Unit 1a, Gatwick Gate	Q2 2018	Secondhand	15,723	£10.25	7 years	World Duty Free

Source: JLL

- 2.12. These transactions total 515,193 sq ft and demonstrate a good depth of demand for both new and secondhand industrial and warehouse premises.
- 2.13. Another indicator of strong demand is development activity, particularly speculative development. Recent development activity is scheduled in Table 2 below.

Table 2: Recent Development Activity in Gatwick and Crawley

Scheme	Developer	Development	Comments
Gatwick 55, Rutherford Way, Crawley	Goya	55,000 sq ft	Pre-let to Baker and Stonehouse.
Gatwick 33, London Road, Crawley	Goya and Barwood	33,248 sq ft	Built speculatively and available.
Centron, Crompton Way, Manor Royal	Wrenbridge	53,500 sq ft in two units	Built speculatively. A unit of 20,136 sq ft has been let to Mel Components. A unit of 33,402 sq ft is still available.
North Gatwick Gateway, Horley	Goya and Hillwood	5 units totalling 168,674 sq ft	Built speculatively. Two units let to Brymec and Amazon – with three units available from 20,646 sq ft to 30,871 sq ft.
St Modwen Park, Gatwick, Junction 10, M23, Copthorne	St Modwen	100,008 sq ft	Pre-let to Gatwick Airport Limited
Space Gatwick. Manor Royal	London Metric	Two unit scheme of 83,705 sq ft	Speculatively built. Both units let – to Yusen and Amazon

Source: JLL

- 2.14. The extent of speculative development is a true sign of market confidence. Development has not been limited to one or two developers. Instead, a number of developers have committed to speculative development, with developments competing for occupiers. This illustrates well the depth of demand.

St Modwen Park, Gatwick

- 2.15. The St Modwen scheme, that is adjacent to Allocation SA4, also helps to demonstrate the strong demand levels.
- 2.16. The first phase was pre-let to Gatwick Air. Gatwick Air have taken a 15 year lease, with no breaks, for a unit of 100,008 sq ft. Their lease was signed in September 2019 with a headline base rent of £13.25 per sq ft. This unit is substantially complete (with practical completion due in October 2020).
- 2.17. SMDL has recently committed to build speculatively the second phase of this development. A unit of 64,752 sq ft is proposed. Construction will start in October 2020, with practical completion due Q2 2021. Already, there is good market interest in this unit, particularly from the logistics and e-commerce sectors.
- 2.18. Allocation SA4 represents a potential third phase. This site can accommodate a single unit of 115,000 sq ft on a conventional basis or a smaller cross-dock building on a lesser density. Whilst no planning permission is in place for this phase, there is already good market interest being received from logistics and e-commerce companies looking for a bespoke build to suit unit.

Summary

- 2.19. Gatwick and Crawley is the largest and dominant commercial centre in the sub-region. Its attributes, such as excellent communications, have attracted a number of key sectors.
- 2.20. Since the economy emerged from recession in 2012, the market for industrial and warehouse premises has been particularly buoyant. The Covid-19 pandemic and Brexit has introduced some market uncertainty. However, despite this, we consider the market for new industrial floor space in this location will be resilient.
- 2.21. This has been demonstrated by the level of take up of modern premises and development activity. Specifically, there has been significant speculative development, which is a real litmus test revealing the strength of demand.
- 2.22. St Modwen Park, Gatwick, illustrates well the strength of current demand and market confidence. The first phase had been pre-let and SMDL have committed to the speculative development of Phase 2 as a response to current enquiry levels.

3. Supply of Industrial Premises and Sites

Qualitative Requirements for Occupiers

- 3.1. The most basic requirement for occupiers of modern industrial warehouse premises is access to the strategic road network. Occupiers will avoid premises or sites which have to route through congested built up or residential areas. Premises or sites located at major junctions to motorways or trunk A-roads are at an obvious premium.
- 3.2. Many industrial warehouse operators run on a 24/7 basis. As such, operators will seek premises which are well separated from existing or proposed housing.
- 3.3. Operators will require certain design features. These include: -
 - Buildings with good eaves height (12m and above).
 - Sufficient and secure yard space.
 - Ample parking for both cars and HGVs.
 - Docking and loading doors.
 - Good electricity and gas connection.
- 3.4. In addition, increasingly operators look for well designed buildings in pleasant or landscaped settings. This is an important requirement for attracting and retaining staff in areas of low unemployment.

Constraints on Supply

- 3.5. The supply of industrial premises serving the Crawley and Gatwick market area is constrained both quantitatively and qualitatively. There has been limited expansion beyond the built conurbation, because of protective planning policies. In addition, the vast majority of industrial floor space is located in Manor Royal.
- 3.6. The latter does provide certain advantages in terms of conglomeration, but restricts the range and choice of alternative locations. Other business or industrial parks serving Gatwick and Crawley tend to be small, surrounded by residential property, and are not as well related to the strategic road network. Often, they are home to quasi employment/retail activities or offices. In addition, they are mostly built out with little, if any, spare development land.
- 3.7. Manor Royal also has only a limited supply of development land. Most development opportunities for industrial property come through the recycling of older premises.
- 3.8. A good example is Churchill Court, Manor Royal. This site currently accommodates an office building. Equation Estates have purchased the site – 3.8 acres – for £8.95 million on an unconditional basis. They propose to build two units of 20,000 sq ft and 60,000 sq ft and are indicating a quoting rent of between £14.75 and £15.25 per sq ft.

Market Signals

- 3.9. The above example is another demonstration of the strength of demand for new industrial and warehouse premises in the Gatwick and Crawley market area. It also shows the relative strengths of the office and industrial markets, with industrial property now at the forefront.
- 3.10. The growth in demand for industrial property can be gauged further by market signals such as rent and land values. Both have witnessed significant increases over recent years.
- 3.11. In 2015, the highest rents paid were around £9.00 per sq ft. Last year, the highest rent paid was £13.75 (by Mel Components for a 20,000 sq ft at Centron, Crompton Way). Quoting rents for proposed developments (see below for details) now exceed £15.00 per sq ft.
- 3.12. Similarly, land values have grown exponentially. This is due to the rental growth and compressed investment yields. In 2011, land values for industrial development land was circa £1 million per acre. Now, land values have risen to above £2.5 million per acre.
- 3.13. For example, Goya Developments bought the former Phillips site in Horley (7.7 acres – now developed as North Gatwick Gateway) for £20 million. This breaks back to £2.6 million per acre.

Supply of Premises and Sites

- 3.14. Whilst there has been active speculative development, the number of modern premises currently available in Gatwick and Crawley is not substantial. The principal units being marketed are listed below in Table 3.

Table 3: Available Modern Industrial and Distribution Premises in Gatwick and Crawley

Scheme/Property	Size (sq ft)	New/Secondhand	Quoting Rent (£)
Gatwick 33, London Road	33,294	New	£15.00
Centron, Crompton Way	33,402	New	£14.50
Unit 1, North Gatwick Gateway	30,871	New	£13.50
Unit 2, North Gatwick Gateway	25,746	New	£13.50
Unit 2, North Gatwick Gateway	20,646	New	£13.50
2 Crompton Fields, Crompton Way	25,000	Secondhand	£11.00
Valour Park, Gatwick 30	30,395	Secondhand	£15.00
Unit A, Woolborough Lane, Crawley	47,535	Secondhand	£14.00 (subject to refurbishment)

Source: JLL

- 3.15. The range or choice of premises, particularly in terms of size, is also limited. Most unit sizes fall into the 20,000 sq ft to 35,000 sq ft range. Only one unit is above 35,000 sq ft (Unit A, Woolborough Lane at 47,535 sq ft) and none above 50,000 sq ft.
- 3.16. The number of proposed development projects is also limited. The principal projects are set out in Table 4.

Table 4: Proposed Development Projects

Scheme	Developer	Proposed Development	Comments
St Modwen Park, Gatwick	St Modwen	64,752 sq ft	Phase 2. Single unit. Construction about to commence. Quoting rent of £14.25 per sq ft.
Churchill Court, Crawley	Equation	85,000 sq f	Two units at 20,000 sq ft and 65,000 sq ft. Quoting rent of £14.75 to £15.25 per sq ft.
Midpoint 23, Pease Pottage	Arcus	86,000 sq ft	Multi-let scheme, with unit sizes from 9,558 sq ft to 39,000 sq ft. Quoting £12.50 per sq ft. Construction to start Q1 2021.

Source: JLL

3.17. We are aware of two other sites which may come forward. These are: -

- Napier Way, Manor Royal.
- Horley Business Park.

3.18. The former is a 7.7 acre site in Manor Royal, currently on the market. Best bids were due on 18 September 2020. It has been reported that the sale has attracted significant interest.

3.19. The latter is an allocation in the Reigate and Banstead Local Plan. It is a well located site with direct access to Junction 9A of the M23 and is a joint venture between the landowner, Reigate and Banstead Borough Council, and Berwick Hill. It is a mid-term project, with the majority of the proposed development for offices.

St Modwen Park, Gatwick

3.20. Allocation SA4 represents a potential third phase of St Modwen Park, Gatwick. It enjoys all the necessary attributes to accommodate and attract industrial occupiers. These attributes include: -

- Direct access to the A264 at Junction 10 of the M23.
- Established industrial location following Phases 1 and 2.
- Separation from recent and current housing.
- Pleasant natural and landscaped setting.

3.21. The site measures 6.7 acres (2.7 hectares) gross. This can accommodate a unit of up to 115,000 sq ft. Very few other sites in Gatwick and Crawley market area are able to accommodate units of this size and this places the site at a premium.

Summary

3.22. The supply of modern industrial premises serving the Gatwick and Crawley market is thin, both quantitatively and qualitatively. This is despite a strong and active development market providing a stream of speculatively built units.

3.23. In addition, the pipeline of new sites is restricted relative to demand. The availability of new premises coming to the market will not be sufficient to accommodate recent and current demand levels. There is a manifest shortage of employment development land.

3.24. This imbalance in the market, of demand over supply, has led to significant increases in rents and land values over the last 5 years. To ensure that industrial premises do not become unaffordable, further development land needs to be brought forward in both the short and medium term.

- 3.25. Additional land as proposed by Allocation SA4, is particularly well suited to meet this demand. It enjoys all the necessary attributes to accommodate and attract industrial occupiers and, unlike most recent developments, can provide buildings of scale.

4. Conclusions and Summary

- 4.1. Gatwick and Crawley is the largest and dominant commercial centre in the sub-region. Its attributes, such as excellent communications, have attracted a number of key sectors.
- 4.2. Since the economy emerged from recession in 2012, the market for industrial and warehouse premises has been particularly buoyant. The Covid-19 pandemic and Brexit has introduced some market uncertainty. However, despite this, we consider the market for new industrial floor space in this location will be resilient.
- 4.3. This has been demonstrated by the level of take up of modern premises and development activity. Specifically, there has been significant speculative development, which is a real litmus test, revealing the strength of demand.
- 4.4. St Modwen Park, Gatwick, illustrates well the strength of current demand and market confidence. The first phase had been pre-let and SMDL have committed to the speculative development of Phase 2 as a response to current enquiry levels.
- 4.5. The supply of modern industrial premises serving the Gatwick and Crawley market is thin, both quantitatively and qualitatively. This is despite a strong and active development market providing a stream of speculatively built units.
- 4.6. In addition, the pipeline of new sites is restricted relative to demand. The availability of new premises coming to the market will not be sufficient to accommodate recent and current demand levels. There is a manifest shortage of employment development land
- 4.7. This imbalance in the market, of demand over supply, has led to significant increases in rents and land values over the last 5 years. To ensure that industrial premises do not become unaffordable, further development land needs to be brought forward in both the short and medium term.
- 4.8. Allocation SA4 is particularly well suited to meet this demand. It enjoys all the necessary attributes to accommodate and attract industrial occupiers and, unlike most recent developments, can provide buildings of scale.



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From: Steve Molnar <steve.molnar@torltd.co.uk>
Sent: 23 September 2020 16:04
To: ldfconsultation
Cc: Dinny Shaw
Subject: Site Allocations DPD Regulation 19 Submission version: Consultation Response on behalf of St Modwen Developments
Attachments: SMD policies maps BUAB comments.pdf; SMD Reg 19 Policy SA1 new employment site.pdf; SMD reg 19 Policy SA11 additional site.pdf; SMD Reg 19 Policy SA1 re site SA4.pdf

Dear Sir/Madam

Please find attached a consultation response regarding the Mid Sussex Site Allocations DPD Submission version. The response is submitted on behalf of St Modwen Developments (SMD) and includes a response on the altered Built up Area Boundary on the Policies Map as well as responses to policies SA1, SA4 and SA11 in the Submission DPD itself.

SMD is currently developing land to the west of Copthorne to provide new homes and employment uses, along with generous open space areas, and the comments relate to aspects of the DPD that are compatible with the current development, including the welcome allocation of additional employment land at site SA4.

SMD supports the Submission DPD, and considers that it is sound.

However, there are opportunities to support further employment and the development of additional new homes on land to the west of Copthorne, if MSDC or the Inspector are minded to be more flexible in providing additional headroom in meeting the District's identified needs, including those of neighbouring areas. These opportunities are highlighted in the comments attached.

Please don't hesitate to contact me if you wish to discuss the content of the attached or related matters.

Yours sincerely

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Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA1

ID: 706

Response Ref: Reg19/706/3

Respondent: Mr E Hanson

Organisation: Barton Willmore

On Behalf Of: Glenbeigh and Dacorar

Category: Developer

Appear at Examination? ✓

Regulation 19 Consultation

Mid Sussex Site Allocations Development Plan Document

Representations prepared by Barton Willmore on behalf of
Glenbeigh Developments Ltd and Dacorar Southern Ltd

September 2020

Regulation 19 Consultation

Mid Sussex Site Allocations Development Plan Document

Representations prepared by Barton Willmore on behalf of
Glenbeigh Developments Ltd and Dacorar Southern Ltd

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APPENDICES

APPENDIX 1	:	SITE LOCATION PLAN (PL-150)
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1.0 INTRODUCTION

1.1 These representations are submitted on behalf of Glenbeigh Developments Ltd and Dacorar Southern Ltd in response to the draft Site Allocations Development Plan Document (DPD) Regulation 19 consultation being undertaken by Mid Sussex District Council (MSDC).

1.2 Glenbeigh control some 8.9 ha of land south of the A2300 (the Hub), Gatehouse Lane, Goddards Green for employment development. An application for employment development (LPA ref. DM/19/2641) was submitted in June 2019 and on 19th September 2019, Planning Committee resolved to grant permission for the following:

"Employment development comprising up to 40,695sqm (Class B1(b), B1(c), B2 and B8) with ancillary offices, car parking and associated infrastructure. Access to be determined."

1.3 Since planning permission DM/19/2641 was granted, a further application has been prepared under Section 73 of the TCP Act to amend condition 18 which limits the quantum of B8 floorspace at The Hub. This is due for submission by the end of September.

1.4 The Site was also subject to a previous planning permission (LPA ref. 13/0168/OUT) approved on 10th November 2015 for the following:

"Employment development comprising up to 50,000sqm (Class B1(b), B1(c), B2 and B8) with ancillary offices, access, car parking and associated infrastructure. Access to be determined."

1.5 This permission expired in November 2018 prior to the submission of all reserved matters applications.

1.6 A reserved matters application for landscaping only (LPA ref. DM/16/0007) was approved in April 2016. Approval was secured for two further reserved matters applications (LPA refs. DM/16/5637 and DM/18/4588) in September 2017 and March 2019, allowing for 4,076 sqm of B1b, B1c, B2 and B8 employment uses and 5,229 sqm of B1c, B2 and B8 employment uses respectively.

2.0 REPRESENTATIONS TO THE DRAFT LOCAL PLAN

EVIDENCE BASE

- 2.1 The **Site Selection Paper 4: Employment Sites (February 2020)** confirms that the Council have updated the Employment Need evidence which has identified that an additional 10-15ha of B-Class employment land in addition to the 25ha allocated within the District Plan. This comprises 3.08 ha of B1 (office) use, 3.69 ha of B2 (general industrial) use and 8.23 ha of B8 (storage/distribution) use, albeit this should be treated as a guideline.
- 2.2 The **Sustainability Appraisal (SA) (July 2020)** states that “the employment need figure does not take account of the proposed Science and Technology Park allocated as a ‘broad location’ to the west of Burgess Hill in policy DP1. The aim of this site is to serve a niche market, and to help meet a wider regional need. It will, of course, provide jobs for those residents already economically active within Mid Sussex but is being treated as a separate instance – it is intended that the employment need will be met but allocating additional employment sites within the Site Allocations DPD.”
- 2.3 The SA provides an assessment of alternative employment strategies, namely:
- **Option A:** Allocate sufficient ‘new’ employment sites to meet the 10-15ha
 - **Option B:** Meet the need in part through allocating ‘new’ site and relying on ‘windfall’ from expansion/redevelopment/intensification of existing sites to meet the remainder
 - **Option C:** ‘Do Nothing’ i.e. solely rely on the Science and Technology Park to meet remaining need (as well as contributing to wider regional need).
- 2.4 Whilst the SA concludes that Option A is the most suitable approach for meeting employment need, Glenbeigh consider that the need for B8 accommodation could be through expansion and intensification of the existing Hub site.
- 2.5 With regards to land use and impacts upon the countryside, the assessment notes that option A will likely require development of greenfield sites, as would option C. However, expanding or intensifying existing sites such as the Hub would minimise the need to develop greenfield land elsewhere in the District for employment use.

- 2.6 In looking at employment and economic growth, the assessment also confirms that option A would provide more certainty that employment need would be met, compared to option B which relies on windfall development and option C which is likely to only provide employment opportunities in certain fields.

DRAFT SITE ALLOCATIONS DPD

Policy SA5: Land at Bolney Grange Business Park

Policy Reference	Site Name	Settlement Type	Settlement / Parish	Employment Uses	Available Development Land (ha)
SA5	Land at Bolney Grange Business Park	Category 3 – Medium Sized Settlement	Bolney	B1/B2/B8	7

- 2.7 Policy SA5 allocates land at Bolney Grange Business Park for a mix of employment uses (B1/B2/B8). The policy also seeks improvements to public transport links, particularly between the site and proposed Science and Technology Park.
- 2.8 Reflecting the arguments above, development of the land at Bolney Grange Business Park is not considered necessary. Indeed, the District's B8 requirements could be met by delivering further B8 uses at The Hub.
- 2.9 Furthermore, given the nature of B8 uses, namely for storage and distribution, the use of larger vehicles is expected. Stairbridge Lane to the east of the site is unsuitable for HGVs and access to and egress from the existing Business Park is via a left-in, left-out arrangement. Glenbeigh consider that the Hub would be a more appropriate location for B8 accommodation where there are no restrictions to vehicle movements or parking.

Policy SA6: Marylands Nursery, Cowfold Road

Policy Reference	Site Name	Settlement Type	Settlement / Parish	Employment Uses	Available Development Land (ha)
SA6	Marylands	Category 3 –	Bolney	B8	2.4

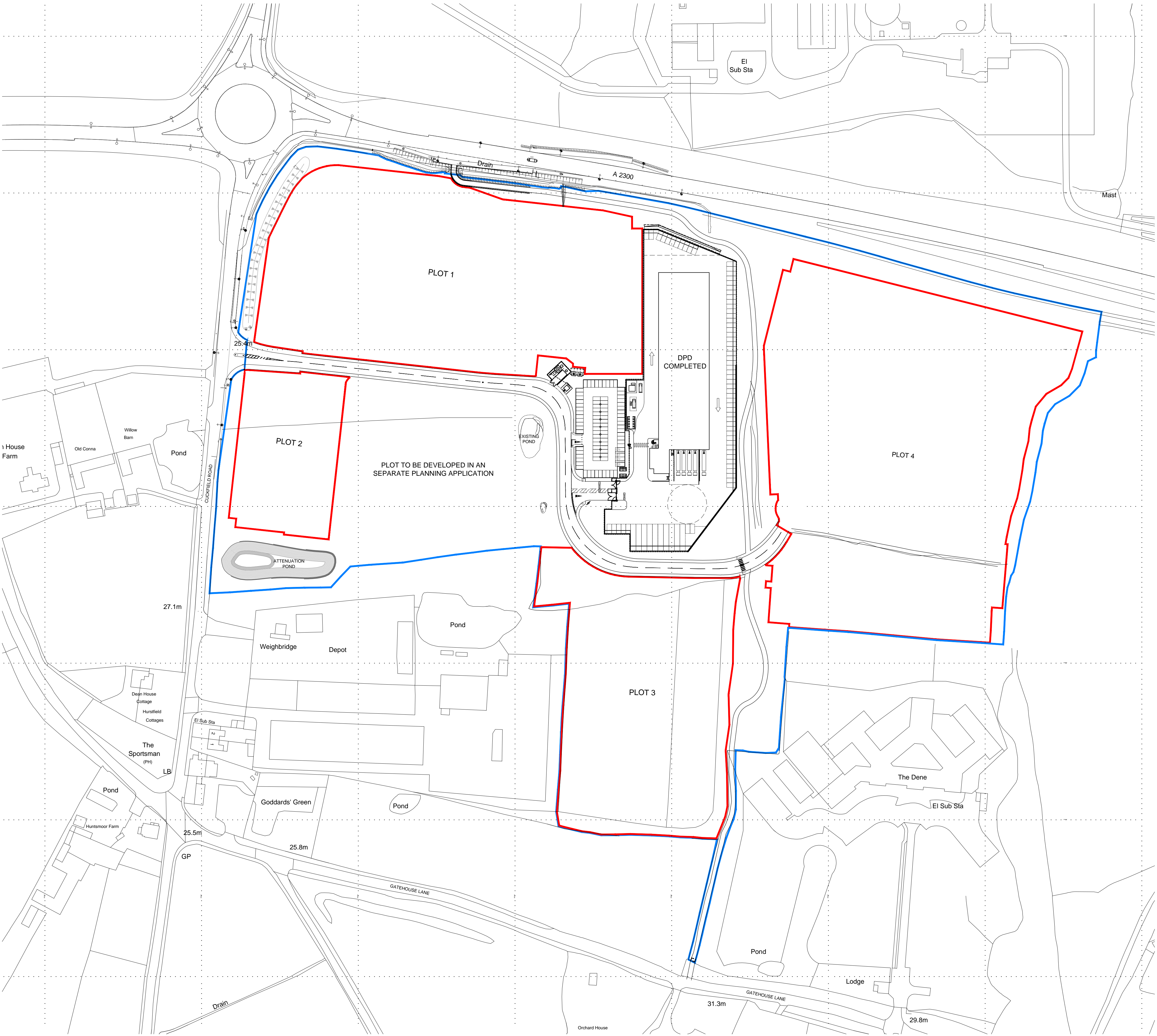
	Nursery, Cowfold Road	Medium Sized Settlement			
--	-----------------------------	-------------------------------	--	--	--

- 2.10 Policy SA6 allocates Marylands Nursery for B8 employment use, as well as enabling non-business classes where B8 uses alone would not be economically viable. The policy requires the existing access from the northern roundabout to be used.
- 2.11 Glenbeigh do not consider Marylands Nursery to be a suitable site for B8 uses. The site offers only 2.4ha of development land, which is not considered to be sufficient for accommodating B8 uses. In addition, the two completed parcels at the Hub operate on a 24/7 basis with no planning restrictions, thus it is appropriate to concentrate these uses in one location. Again, given the availability of land at the Hub, it is not considered necessary to allocate this SA6 to meet the District's B8 employment needs.
- 2.12 In light of the above, Glenbeigh object to the proposed employment allocations at Bolney Grange Business Park and Marylands Nursery. These allocations are not considered necessary to meet B8 employment need and the quantum of B8 use sought under Policies SA5 and SA6 could instead be provided by development at the Hub.

3.0 CONCLUSIONS

- 3.1 Glenbeigh object to the proposed employment allocations at Bolney Grange Business Park (Policy SA5) and Marylands Nursery (Policy SA6).
- 3.2 The updated employment land requirement for the District does not take account of the availability of land at The Hub for additional B8 use, but this site is available now. Accordingly, allocations for new employment sites in Bolney are not considered necessary to meet the District's B8 requirements.
- 3.3 Further assessment of the proposed new employment sites in Bolney has identified additional issues associated with development of these sites, namely unnecessary development of greenfield land, potential highways impacts and insufficient land for the uses proposed.

APPENDIX 1



NOTES:

SUBJECT TO STATUTORY CONSENTS

SUBJECT TO SURVEY

BASED ON OS MAP REPRODUCED BY PERMISSION OF CONTROLLER OF HM STATIONARY OFFICE (c) CROWN COPYRIGHT

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PLANNING BOUNDARY
TOTAL AREA:
8.92 HA / 22.05 ACRES

OWNERSHIP BOUNDARY
14.84 HA / 36.67 ACRES

—	18/06/2019	First issue	GZ	AC
REV	DATE	NOTE	DRAW	CHK



CHARTERED ARCHITECTS

11 PLATO PLACE
ST DIONIS' ROAD
LONDON SW6 4TU

TELEPHONE 020 7736 6162
FAX 020 7736 3896
www.mso-architects.co.uk

TITLE

GODDARDS GREEN

DRAWING

SITE LOCATION PLAN

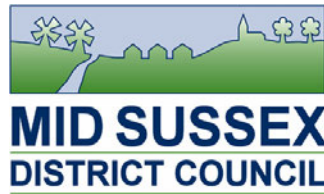
CLIENT

GLENBEIGH DEVELOPMENTS

DATE	SCALE	DRAWN
APRIL 2019	1:1250@A1	GZ
	STATUS	CHECKED
	PLANNING	AC

DRAWING NUMBER

30425-PL-150



Site Allocations Development Plan Document Regulation 19 Submission Draft Consultation Form

The District Council is seeking representations on the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

The Site Allocations DPD, has four main aims, which are:

- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

All comments submitted will be considered by a Planning Inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is sound.

The Site Allocations DPD is available to view at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

A number of documents have been prepared to provide evidence for the Site Allocations DPD and these can be viewed on the Council's website at the above address.

Paper copies will also be at the Council offices (see address below) and your local library and available to view if the buildings are able to open during the consultation period.

Please return to Mid Sussex District Council by midnight on 28th September 2020

How can I respond to this consultation?

Online: A secure e-form is available online at:

www.midsussex.gov.uk/planning-building/development-plan-documents/

The online form has been prepared following the guidelines and standard model form provided by the Planning Inspectorate. To enable the consultation responses to be processed efficiently, it would be helpful to submit a response using the online form, however, it is not necessary to do so. Consultation responses can also be submitted by:

Post: Mid Sussex District Council
Planning Policy
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

E-mail: LDFconsultation@midsussex.gov.uk

A guidance note accompanies this form and can be used to help fill this form in.

Part A – Your Details (You only need to complete this once)

1. Personal Details

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Ed"/>
Last Name	<input type="text" value="Hanson"/>
Job Title (where relevant)	<input type="text" value="Associate"/>
Organisation (where relevant)	<input type="text" value="Barton Willmore"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="Glenbeigh Developments Ltd and Dacorar Southern Ltd"/>
Address Line 1	<input type="text" value="7 Soho Square"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text" value="London"/>
Post Code	<input type="text" value="W1D 3QB"/>
Telephone Number	<input type="text" value="0207 446 6888"/>
E-mail Address	<input type="text" value="ed hanson@bartonwillmore.co.uk"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

Part B – Your Comments

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

Barton Willmore on behalf of Glenbeigh Developments Ltd

3a. Does your comment relate to:

Site
Allocations
DPD

☒

Sustainability
Appraisal

☐

Habitats Regulations
Assessment

☐

Community
Involvement
Plan

☐

Equalities
Impact
Assessment

☐

Draft Policies
Maps

☐

3b. To which part does this representation relate?

Paragraph

Policy SA

Draft Policies Map

4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate.

Yes ☒

No ☐

4b. Sound

Yes ☐

No ☐

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

6a. If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected '**No**' to either part of question **4** please also complete question **6b**.

Refer to representations.

t is

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

Refer to representations.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Refer to representations.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Refer to representations.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

(i) The Plan has been submitted for Examination

☒

(ii) The publication of the recommendations from the Examination

☒

(iii) The Site Allocations DPD is adopted

☒

Signature:

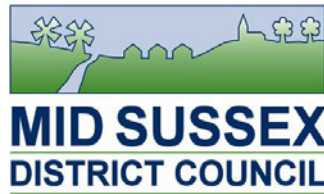


Date:

25/09/2020

Thank you for taking time to respond to this consultation

Site Allocations DPD: Regulation 19 Consultation Response**Policy:** SA1**ID:** 1656**Response Ref:** Reg19/1656/1**Respondent:** Miss S Fenlon**Organisation:** ASP**On Behalf Of:** London Town Property Holdings Ltd**Category:** Promoter**Appear at Examination?** x



Site Allocations Development Plan Document Regulation 19 Submission Draft Consultation Form

The District Council is seeking representations on the Submission Draft Site Allocations Development Plan Document, which supports the strategic framework for development in Mid Sussex until 2031.

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- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

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www.midsussex.gov.uk/planning-building/development-plan-documents/

A number of documents have been prepared to provide evidence for the Site Allocations DPD and these can be viewed on the Council's website at the above address.

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Planning Policy
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

E-mail: LDFconsultation@midsussex.gov.uk

A guidance note accompanies this form and can be used to help fill this form in.

Part A – Your Details (You only need to complete this once)

1. Personal Details

Title	<input type="text" value="Miss"/>
First Name	<input type="text" value="Shannon"/>
Last Name	<input type="text" value="Fenlon"/>
Job Title (where relevant)	<input type="text" value="Planner"/>
Organisation (where relevant)	<input type="text" value="ASP"/>
Respondent Ref. No. (if known)	<input type="text"/>
On behalf of (where relevant)	<input type="text" value="London Town Property Holdings Ltd"/>
Address Line 1	<input type="text" value="c/o ASP"/>
Line 2	<input type="text" value="Old Bank Chambers"/>
Line 3	<input type="text" value="London Road"/>
Line 4	<input type="text" value="Crowborough"/>
Post Code	<input type="text" value="TN6 2TT"/>
Telephone Number	<input type="text" value="01892 610408"/>
E-mail Address	<input type="text" value="sfenlon@asplanning.co.uk"/>



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

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Part B – Your Comments

You can find an explanation of the terms used in the guidance note. Please fill this part of the form out for each representation you make.

Name or Organisation:

ASP (submitted on behalf of London Town Property Holdings Ltd.)

3a. Does your comment relate to:

Site
Allocations
DPD

☒

Sustainability
Appraisal

☐

Habitats Regulations
Assessment

☐

Community
Involvement
Plan

☐

Equalities
Impact
Assessment

☐

Draft Policies
Maps

☐

3b. To which part does this representation relate?

Paragraph

Policy SA

5

Draft Policies Map

4. Do you consider the Site Allocations DPD is:

4a. In accordance with legal and procedural requirements; including the duty to cooperate.

Yes ☒

No ☐

4b. Sound

Yes ☒

No ☐

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3) Effective	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(4) Consistent with national policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6a. If you wish to support the legal compliance or soundness of the Plan, please use this box to set out your comments. If you selected '**No**' to either part of question **4** please also complete question **6b**.

We consider policies SA1 and SA5 contained within the proposed plan to be sound. These policies propose to allocate an overall area of 7 hectares of employment land at and adjacent to Bolney Grange Business Park. It is considered that the location of this site is well related to the strategic road network and is contiguous to the Northern Arc mixed use development, this is supported by a robust evidence base and is demonstrated within the Burgess Hill Employment Study 2015 demonstrating that the proposed allocation is justified.

The land at Bolney Grange Business Park remains available, suitable and deliverable in the short term and will provide employment land in a location which is in accordance with the overall strategic vision set out for the District. It should be recognised that the landowner has submitted a planning application for b-class commercial development on parcel reference 906, this is currently under consideration. The landowner is committed to delivering b-class commercial development within the remaining landholdings.

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

N/A

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change,

as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick below as appropriate)

☒ **No**, I do not wish to participate at the oral examination

☐ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please notify me when:

(i) The Plan has been submitted for Examination

X

(ii) The publication of the recommendations from the Examination

X

(iii) The Site Allocations DPD is adopted

X

Signature:

Date:

23/09/2020

Thank you for taking time to respond to this consultation

2444

Site Allocations DPD: Regulation 19 Consultation Response

Policy: SA1

ID: 2444

Response Ref: Reg19/2444/2

Respondent: Mr D Frisby

Organisation: DMH Stallard LLP

On Behalf Of: Crawley Garden Centre

Category: Promoter

Appear at Examination? ✓

Name	Mr Daniel Frisby
Job title	Associate Planner
Organisation	DMH Stallard LLP
On behalf of	Mr Frank Verbeeten (Crawley Garden Centre)
Address	Origin One 106 High Street Crawley West Sussex RH10 1AS United Kingdom
Phone	01293-605545
Email	daniel.frisby@dmhstallard.com
Which document are you commenting on?	Site Allocations DPD
Sites DPD Policy Number (e.g. SA1 - SA38)	SA34 (and Appendix A)
Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate	No
(1) Positively prepared	Sound
(2) Justified	Unsound
(3) Effective	Unsound
(4) Consistent with national policy	Sound

Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD

These representations have been prepared by DMH Stallard, on behalf of Mr Frank Verbeeten and family, in response to the consultation on the Mid Sussex District Council ("MSDC") Regulation 19 Site Allocations DPD ("SA DPD").

Our client is the owner of the land at, and surrounding, Crawley Garden Centre (SHELAA Site Ref #604) and as such we welcome the protection of existing employment land through Policy SA34: Existing Employment Sites and the identification of Crawley Garden Centre at Appendix A of the SA DPD.

Policy DP1 Sustainable Economic Development of the adopted District Plan sets out that effective use of employment land and premises will be made by;

"Protecting allocated and existing employment land and premises (including tourism) unless it can be demonstrated that there is no reasonable prospect of its use or continued use for employment or it can be demonstrated that the loss of employment provision is outweighed by the benefits or relative need for the proposed alternative use;

Permitting appropriate intensification, conversion, redevelopment and/or extension for employment uses providing it is in accordance with other policies in the Plan;
..."

Further to our comments on the Regulation 18 version of the SA DPD we recognise and welcome the inclusion of land that had previously been omitted from the identified area of Crawley Garden Centre. However, we consider that the SA DPD remains unsound as it still does not include all of the land within our Client's ownership including existing storage uses (as shown on the enclosed plan) and a residential dwelling. For the reasons set out below we are of the view that the Policy SA35 and Appendix A are currently not justified nor effective and therefore the SA DPD is unsound. In order to be made sound, we submit that the boundaries of the site as shown in Appendix A should be amended accordingly, increasing the allocation of the site by a further 0.10 hectares in accordance with the enclosed plan.

It is unclear why the entirety of land associated with Crawley Garden Centre has not been identified within Appendix A. The remaining land, not currently included, comprises a previously developed storage use, with the same characteristics as the identified land, and a single dwelling. It is considered that both of these areas should be protected for future employment development under Policy SA34 to allow for further expansion and comprehensive development at Crawley Garden Centre. Whilst it is acknowledged that the dwelling is in residential use, this is clearly non-conforming with the surrounding employment uses and should be protected/allocated for future employment development, to allow for the Site to be addressed comprehensively. Consequently, it is considered that this decision is not justified and the plan should be found unsound, unless amended to include these areas. This would ensure that the full benefits of the identified employment land can be delivered.

In addition and in recognition that DP1 supports the intensification and redevelopment of existing employment sites, the identification of only part of Crawley Garden Centre in Appendix A is not considered to be effective as it would limit any future development proposals and would not allow for an efficient use of land. Consequently, we consider that Policy SA34 and associated Appendix A is not effective. It is considered that in order to be made 'sound', Appendix A should be amended to include all remaining areas within the identified Crawley Garden Centre employment site.

All of the land at Crawley Garden Centre is considered both suitable and sustainably located for employment uses and there are sufficient existing boundaries which allow for the allocation line to be amended. To the north of the site is the APH long term parking facility, woodland falls to the east and west and the A2220 Copthorne Road to the south. The construction of the new APH long term parking facility has altered the surrounding landscape and character of the area. Further employment (existing and proposed) can be found to the north of the APH parking facility. Consequently, the site is entirely surrounded by existing employment uses and is ideally suited for this purpose.

The access to the site has been substantially improved in recent years due to applications 12/01020/FUL for the relocation of the long term off-airport parking company APH and subsequent application (DM/17/4642) for amended access. A right hand ghost island filter lane has been added for traffic turning into the site on the Crawley bound A2220. Improved street lighting has also been installed.

The site is well located in relation to transport links to the local road network, the wider strategic road network through the M23, Gatwick Airport and Crawley, making it an ideal location for continuation and/or intensification of employment uses.

There are a number of bus services with a bus stop directly opposite the site, offering a number of routes including routes to Three Bridges Train Station, including:

272 - Crawley- Brighton
281 - Crawley - Lingfield
291 - Crawley - Tunbridge Wells
400 - East Grinstead - Caterham

Therefore, the site is demonstrably in a sustainable location, with an established employment use and would be suitable for further intensification and redevelopment in accordance with MSDP Policy DP1.

Given that the surrounding area are also in an existing employment use and are suitable and sustainable, it is respectfully requested that the map be amended to include the surrounding employment uses to the area shown red on the enclosed plan at Appendix A of the SA DPD. Without this amendment it is considered that the plan is not justified nor effective and would be unsound.

The enclosed plan also shows our clients further land ownership (land within the blue line), extending beyond the current built form, but which could form part of any future redevelopment of the site at a later date. This area currently comprises a Christmas Tree plantation (no longer needed for the Garden Centre business) with limited ecological or visual merit and would support the wider employment uses at Crawley Garden Centre. It is considered that these areas could also be included within the site boundaries, as shown at Appendix A.

Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.	That the Plan at Appendix A to the SA DPD be amended to include all of the land within the red line shown on the attached Plan.
If you wish to provide further documentation to support your response, you can upload it here	https://forms.midsussex.gov.uk/upload_dld.php?fileid=ed86f03d4fe35edbf3b25f51a95eeee
If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination	Yes, I wish to participate at the oral examination
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary	In order to set out our case for including the omitted areas within the identified Crawley Garden Centre employment site.
Please notify me when-The Plan has been submitted for Examination	yes
Please notify me when-The publication of the recommendations from the Examination	yes
Please notify me when-The Site Allocations DPD is adopted	yes
Date	28/09/2020



Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
RH16 1SS

Date 21 September 2020
Your ref Site Ref #604
Our ref 0704

Dear Sir/Madam,

Mid Sussex Site Allocations DPD
Crawley Garden Centre, Copthorne Road A2220 Site Ref. #604
On behalf of Mr F Verbeeten

These representations have been prepared by DMH Stallard, on behalf of Mr Frank Verbeeten and family, in response to the consultation on the Mid Sussex District Council ("MSDC") Regulation 19 Site Allocations DPD ("SA DPD").

Our client is the owner of the land at, and surrounding, Crawley Garden Centre (SHELAA Site Ref #604) and as such we welcome the protection of existing employment land through Policy SA34: Existing Employment Sites and the identification of Crawley Garden Centre at Appendix A of the SA DPD.

Policy DP1 Sustainable Economic Development of the adopted District Plan sets out that effective use of employment land and premises will be made by;

- *"Protecting allocated and existing employment land and premises (including tourism) unless it can be demonstrated that there is no reasonable prospect of its use or continued use for employment or it can be demonstrated that the loss of employment provision is outweighed by the benefits or relative need for the proposed alternative use;*

Griffin House 135 High Street Crawley West Sussex RH10 1DQ DX DX 57102 Crawley
Main line 01293 605000 Direct line 0129360 5598 Fax 01293 663520 Email Fay.Goodson@dmhstallard.com

Offices in London, Gatwick, Guildford, Brighton and Horsham. Website www.dmhstallard.com

DMH Stallard LLP is a limited liability partnership registered in England (registered number OC338287). Its registered office is Griffin House, 135 High Street, Crawley, West Sussex, RH10 1DQ and it is authorised and regulated by the Solicitors Regulation Authority. The term partner is used to refer to a member of DMH Stallard LLP. A list of members may be inspected at the registered office. The firm is part of Law Europe and is represented around the world through its international network.



- *Permitting appropriate intensification, conversion, redevelopment and/or extension for employment uses providing it is in accordance with other policies in the Plan;*
-”

Further to our comments on the Regulation 18 version of the SA DPD we recognise and welcome the inclusion of land that had previously been omitted from the identified area of Crawley Garden Centre. However, we consider that the SA DPD remains unsound as it still does not include all of the land within our Client’s ownership including existing storage uses (as show on the enclosed plan) and a residential dwelling. For the reasons set out below we are of the view that the Policy SA35 and Appendix A are currently not justified nor effective and therefore the SA DPD is unsound. In order to be made sound, we submit that the boundaries of the site as shown in Appendix A should be amended accordingly, increasing the allocation of the site by a further 0.10 hectares in accordance with the enclosed plan.

It is unclear why the entirety of land associated with Crawley Garden Centre has not been identified within Appendix A. The remaining land, not currently included, comprises a previously developed storage use, with the same characteristics as the identified land, and a single dwelling. It is considered that both of these areas should be protected for future employment development under Policy SA34 to allow for further expansion and comprehensive development at Crawley Garden Centre. Whilst it is acknowledged that the dwelling is in residential use, this is clearly non-conforming with the surrounding employment uses and should be protected/allocated for future employment development, to allow for the Site to be addresses comprehensively. Consequently, it is considered that this decision is not justified and the plan should be found unsound, unless amended to include these areas. This would ensure that the full benefits of the identified employment land can be delivered.

In addition and in recognition that DP1 supports the intensification and redevelopment of existing employment sites, the identification of only part of Crawley Garden Centre in Appendix A is not considered to be effective as it would limit any future development proposals and would not allow for an efficient use of land. Consequently, we consider that Policy SA34 and associated Appendix A is not effective. It is considered that in

order to be made 'sound', Appendix A should be amended to include all remaining areas within the identified Crawley Garden Centre employment site.

All of the land at Crawley Garden Centre is considered both suitable and sustainably located for employment uses and there are sufficient existing boundaries which allow for the allocation line to be amended. To the north of the site is the APH long term parking facility, woodland falls to the east and west and the A2220 Copthorne Road to the south. The construction of the new APH long term parking facility has altered the surrounding landscape and character of the area. Further employment (existing and proposed) can be found to the north of the APH parking facility. Consequently, the site is entirely surrounded by existing employment uses and is ideally suited for this purpose.

The access to the site has been substantially improved in recent years due to applications 12/01020/FUL for the relocation of the long term off-airport parking company APH and subsequent application (DM/17/4642) for amended access. A right hand ghost island filter lane has been added for traffic turning into the site on the Crawley bound A2220. Improved street lighting has also been installed.

The site is well located in relation to transport links to the local road network, the wider strategic road network through the M23, Gatwick Airport and Crawley, making it an ideal location for continuation and/or intensification of employment uses.

There are a number of bus services with a bus stop directly opposite the site, offering a number of routes including routes to Three Bridges Train Station, including:

- 272 – Crawley- Brighton
- 281 – Crawley – Lingfield
- 291 – Crawley – Tunbridge Wells
- 400 – East Grinstead – Caterham

Therefore, the site is demonstrably in a sustainable location, with an established employment use and would be suitable for further intensification and redevelopment in accordance with MSDP Policy DP1.

Given that the surrounding area are also in an existing employment use and are suitable and sustainable, it is respectfully requested that the map be amended to include the surrounding employment uses to the area shown red on the enclosed plan at Appendix



A of the SA DPD. Without this amendment it is considered that the plan is not justified nor effective and would be unsound.

The enclosed plan also shows our clients further land ownership (land within the blue line), extending beyond the current built form, but which could form part of any future redevelopment of the site at a later date. This area currently comprises a Christmas Tree plantation (no longer needed for the Garden Centre business) with limited ecological or visual merit and would support the wider employment uses at Crawley Garden Centre. It is considered that these areas could also be included within the site boundaries, as shown at Appendix A.

DMH Stallard reserve the right to participate in the Examination Hearings and look forward to receiving updates on the progress on the SA DPD.

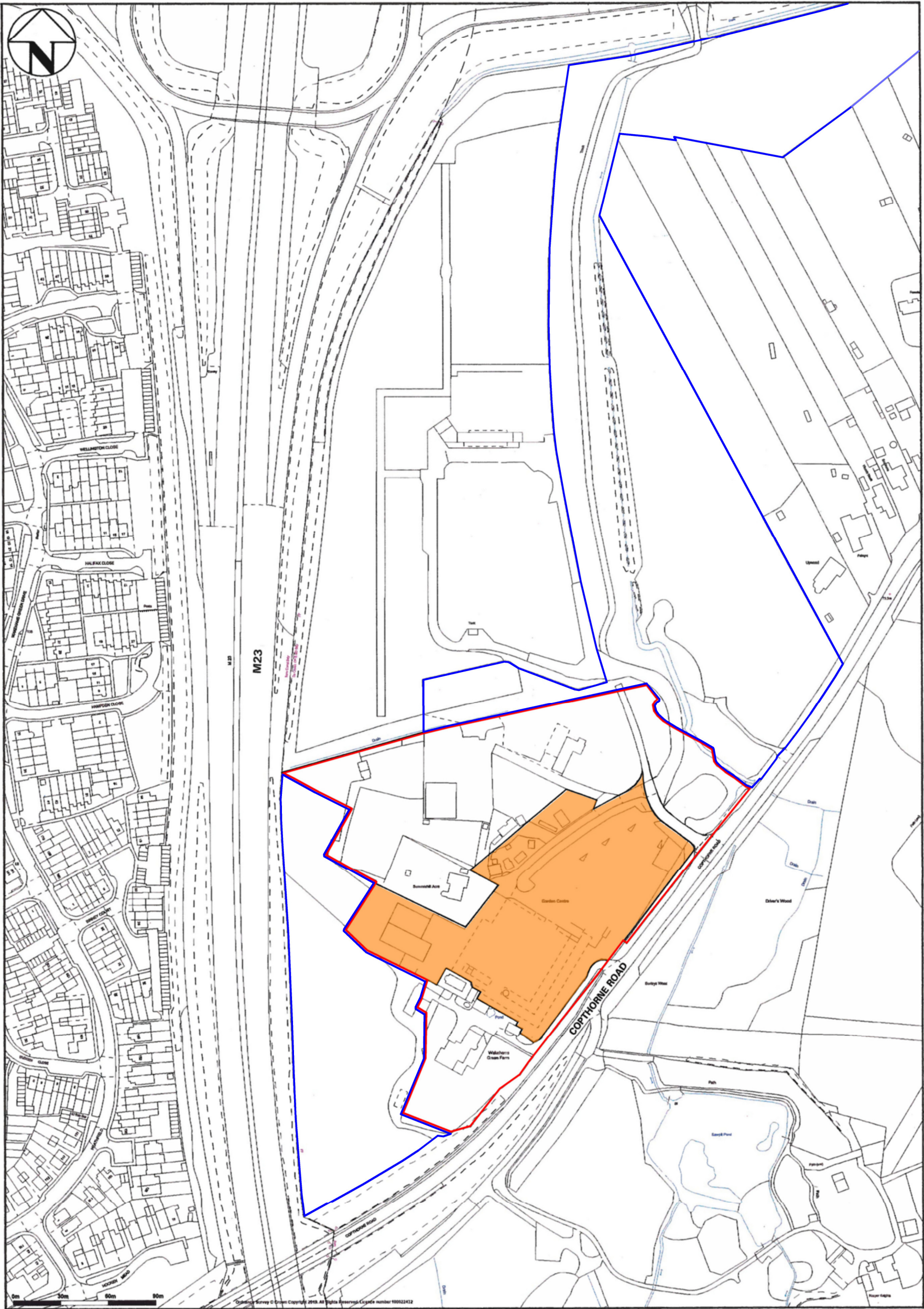
For further information, or to discuss, please contact Daniel Frisby, Associate Planner on 01293 605545 or daniel.frisby@dmhstallard.com.

Yours sincerely



For and on behalf of DMH Stallard LLP




LAND AT, AND SURROUNDING CRAWLEY GARDEN CENTRE
COPTHORNE ROAD, COPTHORNE



Promap^{v2}
LANDMARK INFORMATION

Scale 1:2500 @ A3

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-  The Site
-  Existing Employment Site (SA34)
-  Wider land ownership