

SA4: Land north of the A264 at Junction 10 of M23 - Index by ID Number

ID	Respondent	Organisation	BehalfOf	Respondent Category	Participate
622	Ms T Hurley	Savills	Thames Water	Statutory Consultee	<input type="checkbox"/>
625	Mrs J Nagy	Worth Parish Council		Town & Parish Council	<input checked="" type="checkbox"/>
654	Mr S Molnar	Terence O'Rourke	St Modwen Developments	Promoter	<input type="checkbox"/>
769	Mr E.M. Livesey			Resident	<input type="checkbox"/>
932	Mr J Landrock			Resident	<input type="checkbox"/>
1005	Mr L Beirne			Resident	<input type="checkbox"/>
1421	Ms S Bostel			Resident	<input type="checkbox"/>
1457	J Day	Copthorne Village Association		Organisation	<input type="checkbox"/>

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA4

**ID:** 622

**Response Ref:** Reg19/622/3

**Respondent:** Ms T Hurley

**Organisation:** Savills

**On Behalf Of:** Thames Water

**Category:** Statutory Consultee

**Appear at Examination?** x

**From:** Natasha Hurley <tasha.hurley@savills.com> on behalf of Thames Water Planning Policy <ThamesWaterPlanningPolicy@savills.com>  
**Sent:** 22 September 2020 08:52  
**To:** ldfconsultation  
**Cc:** Devcon Team; David Wilson; Nicky.Mchugh@thameswater.co.uk; Mark Dickinson; 'John Georgoulas'  
**Subject:** Mid Sussex District Council – Site Allocations DPD (Regulation 19) Consultation - RESPONSE ON BEHALF OF THAMES WATER UTILITIES LTD  
**Attachments:** Mid Sussex sites table sep 2020.xls; 20.09.22 L DW Mid Sussex Site Allocations DPD.PDF  
**Categories:** SiteDPD

Dear Sir/ Madam

Please find our response to the above attached on behalf of Thames Water.

Regards,  
Tasha

**Tasha Hurley**  
**Planning Administrator**  
**Planning**

Savills, Ground Floor, Hawker House , 5-6 Napier Court , Napier Road , Reading RG1 8BW



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By Email to: [LDFconsultation@midsussex.gov.uk](mailto:LDFconsultation@midsussex.gov.uk)



David Wilson



[thameswaterplanningpolicy@savills.com](mailto:thameswaterplanningpolicy@savills.com)



0118 9520 500

**22 September 2020**

## **Mid Sussex District Council – Site Allocations DPD (Regulation 19) Consultation**

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory sewerage undertaker for a small part of the Mid Sussex District (around Crawley) and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

### **General Comments on Wastewater and Sewerage Infrastructure**

Thames Water are the waste water service provider for a small part of Mid Sussex District (northern part around Crawley). This mainly encompasses Pease Pottage and Copthorne. Crawley Down and Turners Hill also drain into the Thames Water catchment via Southern Water infrastructure and so their comments will also need to be sought. Thames Water do not supply potable Water to Mid Sussex.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater [and water supply] treatment infrastructure.

Wastewater/sewerage [and water supply] infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

Thames Water Utilities Limited – Registered Office: Clearwater Court, Vastern Road, Reading RG1 8DB

Company number 02366661. VAT registration no GB 537-4569-15

Paragraph 28 relates to non-strategic policies and states: *“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”*

Paragraph 26 of the revised NPPF goes on to state: *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

Paragraph 41 of the NPPF 2019 sets out that: *“The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits....”* The NPPG also provides detailed guidance in relation to ‘Water supply, wastewater and water quality – considerations for planning applications’.

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at:

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that the DPD/Local Plan should include a specific policy on the key issue of the provision of sewerage/wastewater [and water supply] infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy/supporting text:

**PROPOSED NEW WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:**

***“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”***

***“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***

**Comments on Proposed Development Sites**

The information contained within the DPD will be of significant value to Thames Water as we prepare for the provision of future infrastructure.

The attached table provides Thames Water's site specific comments from desktop assessments on sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

Waste-water/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.

As set out in our previous response to the Local Plan, Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully

Thames Water Utilities Ltd

**<http://corporate/dts>**

## All Sites for Development Plan Mid Sussex - DC Planning Policy - Site Allocations DPD

Created Date	Site ID	Site Name	ServiceType	Catchment Planner - Water	Responded? - Water	Catchment Planner - Waste	Responded? - Waste	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
12/08/2020	63391	SA22 - Land north of Burleigh Lane, Crawley Down	Waste		N/A	Victor Alonso	Yes	0	0	0	0	0	0

### Standard Paragraphs:

This site falls outside of Thames Water's wastewater supply boundary.

## Internal Comments:

None

Created Date	Site ID	Site Name	ServiceType	Catchment Planner - Water	Responded? - Water	Catchment Planner - Waste	Responded? - Waste	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
12/08/2020	63401	SA4: Land North of the A264 at J10 of M23	Waste		N/A	Victor Alonso	Yes	0	0	0	0	0	0

### Standard Paragraphs:

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email [Devcon.team@thameswater.co.uk](mailto:Devcon.team@thameswater.co.uk) tel:

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Catchment Planner - Water	Responded? - Water	Catchment Planner - Waste	Responded? - Waste	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
12/08/2020	63402	SA7 - Cedars, (Former Crawley Forest School) Brighton Road, Pease Pottage, Crawley,RH11 9AD	Waste		N/A	Victor Alonso	Yes	0	0	0	0	0	0

### Standard Paragraphs:

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email [Devcon.team@thameswater.co.uk](mailto:Devcon.team@thameswater.co.uk) tel: 0345 206 2060

**Internal Comments:**

None

Created Date	Site ID	Site Name	ServiceType	Catchment Planner - Water	Responded? - Water	Catchment Planner - Waste	Responded? - Waste	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
12/08/2020	63405	SA8: Pease Pottage Nurseries, Brighton Road, Pease Pottage	Waste		N/A	Victor Alonso	Yes	0	0	0	0	0	0

### Standard Paragraphs:

On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email [Devcon.team@thameswater.co.uk](mailto:Devcon.team@thameswater.co.uk) tel:

**Internal Comments:**

None

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA4

**ID:** 625

**Response Ref:** Reg19/625/1

**Respondent:** Mrs J Nagy

**Organisation:** Worth Parish Council

**On Behalf Of:**

**Category:** Town & Parish Council

**Appear at Examination?** ✓



# WORTH PARISH COUNCIL

**Clerk: Mrs Jennifer Nagy**  
**CiLCA; PLCC**

24th September 2020

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

Dear Sirs,

## **Draft Site Allocations DPD (Regulation 19) Consultation**

Following a thorough review of the above DPD and the associated documents, Worth Parish Council has the following comments.

### **Employment**

#### Site SA4 – Land north of the A264 at Junction 10 of the M23

In the original application for development of this area (13/04127/OUTES refers), this site was designated as informal open space. It was to be used as landfill with spoil from the site – “the landfill site will provide an interesting sculptured landform which will be retained as informal open space. The landform will also help screen the development from potential views from the A264”.

Despite the existing permission for industrial units on the site specifying B1/B8 use, only B8 units have been approved under reserved matters applications. The landscaping originally proposed for this area is now more than justified, in order to screen the large mass and height of the B8 units already in situ.

The amenity space also serves to avoid perceived coalescence with Crawley.

Removal of this 2.7-hectare site can be justified, given its current designation as protection for an existing development, whilst still leaving sufficient residual employment land to meet the revised economic development targets.

Should the site be allocated despite these objections, the Council asks that only B1 smaller business units be permitted, with the provision for any B8 units to be removed. This would give a wider range of industrial development, providing more opportunities for local businesses and thus meeting sustainability and economic objectives.

Given the location right on the junction, smaller low rise B1 units would be more suitable to mitigate the impact on the area. The landscaping screen should be of sufficient mass and depth as to provide protection both against perception of coalescence and against traffic noise and pollution from the M23 and Junction 10 itself.

As land levels have been heightened as part of the landfill operations, this should be taken into account to ensure that buildings are low rise from the A264 road level, and that screening is of sufficient depth and height to fulfil its purpose.

### Site Specific Housing

Site SA19 – Land South of Crawley Down Rd, East Grinstead; 200 dwellings.

Site SA20 – Land South and West of Imberhorne Upper School; 550 dwellings.

The proximity of these developments means that their impact on local infrastructure should be assessed as a single development and should be undertaken in the context of existing permissions to the South of SA20 for 200 new homes and East of SA19 for 100 new homes (approx.).

Both Worth Parish Council and Surrey County Council have expressed concerns over capacity along the A22/A264 corridor. The associated local road network at the Turners Hill crossroads and the Sandy Lane, Vicarage Road and Wallage Lane junctions with the Turners Hill Road through Crawley Down should also be considered– see comments on Transport below.

Site SA22 – Land north of Burleigh Lane, Crawley Down; 50 dwellings

Worth Parish Council commented as part of Regulation 18 consultation that the location of the access is not clear. MSDC has responded by including reference to possible access via Sycamore Lane or Woodlands Close.

The Parish Council reiterates its concerns over access to this site. Both Sycamore Lane and Woodlands Close lead to the junction of Kiln Rd and Woodlands Close, a junction which has already been highlighted to WSCC Highways as being dangerous due to lack of clarity with regard to priority, and due to problems with obstructive parking.

An alternative access to the site via Burleigh Lane has obviously been discounted as it is a private, single track lane.

Therefore, this site should be removed on highways grounds

### Housing Numbers

It was noted that during the various iterations of the Site Selection Paper, the wording as to supply across settlement categories has changed. SPP2 refers to unmet residual need being passed down i.e. unmet need to be passed from Category 2 to Category 3 (para 2.10 refers). However, SSP3 refers to unmet need to be passed up (para 2.4.5 refers) This should be clarified.

The DPD allows for 1764 homes, when the residual need is 1280, which is an over- provision of 484. Whilst this figure seems reasonable, it should be noted that it is an over-provision of 37.8% which could be deemed excessive.

In the DPD itself, the residual requirements are tabled by Category and not by individual settlement. The figures are as follows

Category	Minimum Requirement	Minimum Residual	Allocated	Difference
1	10653	706	1409	+703
2	3005	198	105	-93
3	2200	371	238	-133
4	82	5	12	+7
<b>Total</b>	<b>16390</b>	<b>1280</b>	<b>1764</b>	<b>+484</b>

Category 2 settlements have been successful in achieving 93.41% of their target, whilst Category 3 settlements have only achieved 83.1% of their target. The Council argues that more effort could have been made to see what could have been done to mitigate the sites discounted for consideration in the Category 3 settlements.

The Parish Council considers that the methodology used by MSDC to calculate Minimum residual requirements penalises those settlements who have already met their DP6 minimum requirement targets by ignoring the completions and commitments in excess of the DP6 figure for each



settlement. If the excess above the DP6 minimum requirement was included, then the six Category 2 settlements have already met 102% of their over DP6 minimum requirement of 3005.

DP6 Settlement Hierarchy states that “the amount of development planned for in each settlement will need to have regard to the settlement hierarchy, and also take into account of existing delivery, local development needs including significant local infrastructure, and other constraints to development”

1005 of the 1764 additional houses are on sites in the northern half of the district. Worth Parish Council believes that the district would be best served by an equitable distribution of housing throughout the area. The Council recognises the need to concentrate housing around the three district towns which are best placed to support the increased demand on infrastructure; two of these towns are in the south.

Worth Parish will also be adversely impacted by significant development on its border with East Grinstead, with an additional 750 homes being proposed. (See comments on Transport below)

### Windfall Sites

In responding to the Draft DPD in 2019, the Parish Council said that the windfall contribution of 588 dwellings was underestimated, and that evidence would justify 972 from small windfall sites and 500 from large windfall sites.

In the final version of the DPD, the windfall contribution has been reduced to 504 dwellings. This presumably is due to updated empirical evidence.

Para 70 of the NPPF requires compelling evidence that windfall sites will provide a reliable source of supply.

PPG Housing and Economic Land Availability Assessment states that Local Planning Authorities have the ability to identify broad locations in years 6-15, which could include a Windfall allowance.

However, other LPAs such as East Hampshire, have recorded a constant supply of Windfall numbers, so have justified including figures from Year 3 onwards, rather than Year 6.

The District Plan adopted March 2018 allowed for 450 windfall dwellings. With allowances for 450 in 2018, 588 in 2019 and 504 in 2020. Using the East Hampshire model, these figures could be re-visited to see if the 504 figure is realistic or has been under-estimated.

Worth Parish Council has noted Cuckfield Parish Council’s comments relating to Windfall Sites, in that Cuckfield PC is of the opinion that “the allowance for windfall sites within the plan period has been underestimated by 168 dwellings (through the use of inconsistent methodology); 128 dwellings from small windfall sites (up to 9 dwellings) and 480 windfall sites over 9 dwellings.”

Worth Parish Council concurs with this view that contribution from windfall sites have been incorrectly assessed, further evidence that the calculation needs to be re-visited.

### Neighbourhood Plans

The DPD allows for known commitments of 9689, which includes allocations made in Neighbourhood Plans. The majority of parishes have made Plans, which should now be due for review. Some reviewed Plans may incorporate additional allocations, but no reference has been made to these.

Therefore, the Council believes that there is little justification to allocate an additional 50 homes to Crawley Down given that

- The parish has fulfilled its housing allocation
- Category 2 settlements have performed well in the delivery of previous allocations
- The distribution of additional sites has been unfairly biased to the north of the district
- This in turn has put unacceptable strain on the local road network, especially the A264 between East Grinstead and M23 J10.

- The over-provision of 484 dwellings/37.8% is too great, and that the windfall contribution of 504 is too small.
- No consideration has been given to future allocations via revised Neighbourhood Plans within the district.

It is noted that provision of supporting infrastructure is more site specific for strategic sites. Smaller allocations generate lower levels of contributions that are insufficient to fund improvement projects; little consideration is given to the cumulative impact of piecemeal development. It could be argued that larger strategic site allocations provide necessary infrastructure more efficiently and cohesively than smaller sites.

### Transport

MSDC last carried out a Transport Study in November 2015 in preparation for the District Plan in 2018. DP21 of the District Plan makes reference to the West Sussex Transport Plan 2011 to 2026. The WSCC Plan only cites areas around the three towns – East Grinstead, Burgess Hill and Haywards Heath as being in need of improvement. It is noted that East Grinstead is affected by the A264 and the A22, but no reference is made to the impact of traffic on these roads as they travel away from the town.

Completion (almost) of the M23 Smart Motorway and Gatwick Airport's progression of a second runway have taken place since the date of the study; it should be updated as a matter of urgency.

Both Worth Parish Council and Surrey County Council has commented on the impacts of increased levels of housing in East Grinstead upon the A22/A264 network.

DP25 Transport requires any development scheme to "avoid traffic congestion, individually or cumulatively, taking account of any proposed mitigation"; any additional housing sites should be compliant with this policy.

SA35 in the DPD only identifies three transport schemes – A22 corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Rd junctions, A264 upgrades at Copthorne Hotel roundabout, and A23 upgrade at Hickstead.

Junction improvements at all three East Grinstead locations will channel traffic more easily onto the A264.

Worth Parish Council argues that the Dukes Head roundabout should be considered for inclusion in SA35. The B2028 Turners Hill Rd joins this roundabout bringing traffic from the south to head on westwards on the A264 to access local employment centres at Gatwick and Crawley, and also to access the M23 itself for onward journeys.

Capacity studies should take place on all major junctions from M23 J10 eastbound on the A264 until its junction with the A22. This is particularly important given that the 772 homes proposed for East Grinstead are all on the eastern border of Worth Parish, so would have significant impact on the local road infrastructure.

Air quality assessments and modelling should take place to analyse the impact of increased traffic along this corridor to ensure compliancy with SA 38 Air Quality.

In addition, junction capacity on the associated local road network at the Turners Hill crossroads and the Sandy Lane, Vicarage Road and Wallage Lane junctions with the Turners Hill Road through Crawley Down needs to be considered.

Indeed, the Plan would benefit from a District Transport Strategy to promote sustainable development.

NB: There is an error in SA35 in that the maps for "A264 corridor upgrades at Copthorne Hotel Junction" and for A23 Junction upgrades at Hickstead" have been transposed.

### Utilities

It is of concern that Southern Water has indicated that the local sewerage network within the parish has limited capacity.

Indeed, evidence was supplied to the Secretary of State in relation to the Call In of two sites in Crawley Down in 2017 that Copthorne pumping station was at capacity. Whilst developers can fund improvements, piecemeal contributions will not be adequate to address the wider issue of lack of local capacity

There have been very recent issues with water supply in Mid Sussex, in that the processing plants could not purify enough water to meet demand, leaving some household without water for days.

Summer heatwaves seem be the norm, leading to increase in overall demand.

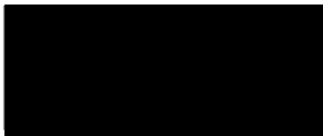
Provision of an adequate water supply must be an inherent part of any Local Plan.

Digital infrastructure has historically been left up to commercial providers. However, recent Covid-19 events have highlighted the need to have access to efficient broadband speeds in order to support the local and national economy.

### Oral Representation at the Examination

Worth Parish Council would like to send representation to the Examination hearing to argue the case for a District Transport Strategy to assess the impact of cumulative development along the A264 corridor, to include capacity and air quality studies. This should encompass feeder routes onto this corridor, such as the A22, the B2028 Turners Hill Rd, and the B2220 Copthorne Rd.

Yours faithfully,

A solid black rectangular box used to redact the signature of Jennifer Nagy.

**Jennifer Nagy**  
**Clerk to the Council**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA4

**ID:** 654

**Response Ref:** Reg19/654/4

**Respondent:** Mr S Molnar

**Organisation:** Terence O'Rourke

**On Behalf Of:** St Modwen Developments

**Category:** Promoter

**Appear at Examination?** x

**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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## **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 3<sup>rd</sup> 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

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- 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

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### 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

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#### 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

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- 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				



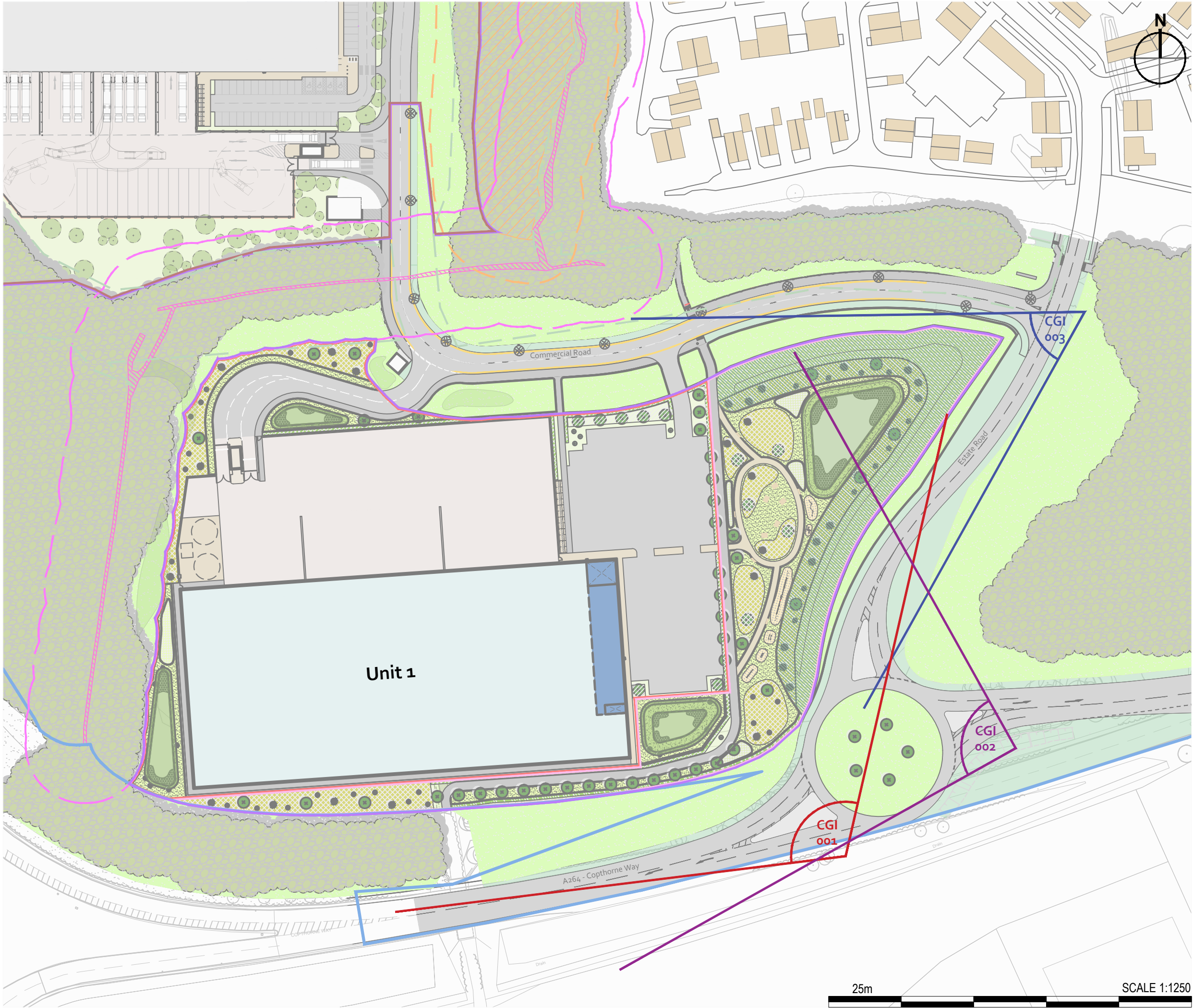


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Drawing Status:	Sketches
Drawn / Checked:	JWY / TDA
Date:	03.08.2020
Scale:	1:1250 A3

St. Modwen Drawing Ref:	Revision:
Drawing no: <b>19226 SK0001</b>	 <b>A</b>





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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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St. Modwen Drawing Ref:	
Drawing no:	Revision:
19226 SK0002	A













## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA4

**ID:** 769

**Response Ref:** Reg19/769/1

**Respondent:** Mr E.M. Livesey

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

[REDACTED]

---

**From:** Mike Livesey [REDACTED]  
**Sent:** 25 September 2020 10:55  
**To:** ldfconsultation  
**Subject:** Site Allocations DPD - Regulation 19 Consultation  
**Attachments:** Response to SiteAlloc DPD Consultn\_AugSep2020w.doc

Dear Sirs,

With regard to the above, please find attached my submission re SA4 Land north of the A264 at Junction 10 of M23 (Employment Area) for consideration in determining the suitability, or otherwise, of this site for inclusion. It details the reasons why the site should not be considered further for this purpose.

Yours faithfully,

E. M. Livesey (Mr)

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Sirs,

Document SA4: Land north of the A264 at Junction 10 of M23 (Employment Area)

With reference to the above consultation, I refer to the above document proposing a developable area of 2.7ha with allocation for employment land within use classes B1 (Business/Light Industrial and B8 (Storage and Distribution) as appropriate for this site.

This site must NOT be proposed for any development whatsoever, especially not the industrial units suggested, for the following reasons:

The site is critically important as a green, tree planted area providing the perception of separation between Crawley and Copthorne and shielding the development to the north from any view from the A264.

This was a major factor stressed by the applicant, St Modwen, when the whole site was being proposed. Their master plan design and access statement figure 1.6 shows very clearly how this space would be retained as green space and planted with additional trees (46 as per the approved Reserved matters application DM/17/4875, of the 152 trees to be planted across the whole site).

As officers will be aware, the approval at committee for this whole site (application 13/04127/OUTES) was gained by a majority of only one. The consistent guarantee from both the applicant and officers that the development would be shielded from view by this green space to retain the perception of separation between Copthorne and Crawley was THE key factor in obtaining this approval.

The following are just some of the statements in the officer's report to that committee:

- 1) from the Executive Summary - "...within the strategic gap between Copthorne and Crawley...the applicants have tried to be respectful.... in identifying.....areas of strategic landscape planting. The main point being the perception of the gap". This statement is repeated verbatim in the officer's Planning Balance / Conclusion statement on page 32 of his report.
- 2) from page 22 of the report, Landscape Impact / Coalescence with Crawley - "The character area is considered to have a high value because much of it has retained a distinctive rural character" and

from page 23 "It is appreciated that the proposed development will erode the space between the western side of Copthorne and the M23/Crawley. However, the perception of this erosion will not, in your officer's opinion, be apparent on the ground to any significant degree" BECAUSE "The structural planting to the south" (i.e. on the space now being proposed as SA4) ".....are important elements in reaching this view."



- 3) Condition 15 of the approved application requires details of the landscape management plan to be approved before work commences and this was the subject of the planting plan approved in the reserved matters application DM/17/4875 already referred to.

I cannot find any subsequent application or amendment to that approval.

At the time of the granting of the outline approval, I was both a MSDC and Worth Parish Councillor. A few days before the application meeting, I received a personal letter from Colin Darby, Planning Manager for St Modwen Properties PLC, on official St Modwen headed paper. Colin Darby was the lead representative for St Modwen in all its proposals and presentations to both MSDC and Worth Parish Council. In his letter he includes a paragraph headed "A sensitive, sustainable development". The paragraph contains the following:

"From the outset, St Modwen has sought to respect the rural character and setting of Copthorne and its environs. As such, the proposals retain the majority of the site as green and open space." ... "The undeveloped, retained open land would be dedicated to ensuring a strong sense of separation, preventing any perception of coalescence with Crawley. Landscaping and careful layout will ensure none of the new homes would be visible from the A264." The underlining is mine but it is quite abundantly clear that St Modwen never intended this green space to be anything other than a green space with trees in order to maintain the perception of separation and shield the new development from view.

For MSDC and St Modwen to now drive a coach and horses through that guarantee and the statements in the officer's report by proposing to allow industrial units be sited on that area would be not only a total dishonouring and complete reversal of the assurances given above but would destroy any sense whatsoever of the perception of separation and the rural character so assiduously repeated by MSDC officers and St Modwen. Such units would be clearly visible from the A264, be an eyesore and blot on the landscape which could not be hidden and totally out of keeping with the rural character. As such, the site is absolutely not worthy of being considered for any development other than as a green, tree planted space.

In addition to the above reasons for rejecting this site, it can be demonstrated that there is no requirement for such units in the area, as follows:

In April 2011 a full application (10/03093/FUL) was approved for the construction of 32,000 sq ft of B1 and B2 units (10 units) at Acacia Grove, Copthorne Common Road RH10 3PD (behind Woodside Garage). It also provided 100 parking spaces of which 11 were for disabled users.

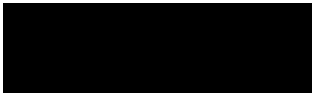
This application was supported by neighbouring properties and approved by committee. However, it has never been implemented as it transpired there was no demand for such units in and around Copthorne. This site is less than 200m (as the crow flies) from the SA4 site where B1 and B8 units are proposed.

As there was no demand for these units in the intervening years at a time when Gatwick business was expanding, with the current (and probably long-lasting, especially as BA has suspended its Gatwick operations indefinitely) decrease in activity, it is highly likely that the requirement for such units is even lower than it was nine years ago and, as no other such developments have been sought in Copthorne during that time, it is quite clear the demand is not there.

I respectfully request that this site (SA4) is not considered any further as an allocation for employment land.

I am happy to provide you with a copy of Colin Darby's letter.

E M Livesey



## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA4

**ID:** 932

**Response Ref:** Reg19/932/1

**Respondent:** Mr J Landrock

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x



<b>Name</b>	Jeremy Landrock
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Name or Organisation</b>	Jeremy Landrock
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA4
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	No
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	The development of Housing between Copthorne and the M23 (reference application 13/4127/OUTES) was given conditional on the maintenance of a notional green space being left along the A264 between Copthorne and Crawley. This proposal completely ignores this condition and removes that green space.
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	04/08/2020

**1005**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA4

**ID:** 1005

**Response Ref:** Reg19/1005/1

**Respondent:** Mr L Beirne

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

**From:** Leo Beirne [REDACTED]  
**Sent:** 28 September 2020 17:19  
**To:** ldfconsultation  
**Subject:** MSDC DEVELOPMENT PLAN DOCUMENT – REG 19 : CONSULTATION.

**Categories:** [REDACTED]

Dear Sir,

Please accept my comments as per the following re. the above, where the text in 'bold' relates to the Document followed by my comments. I found this exercise very taxing limited by my knowledge of how MSDC has applied specific working knowledge and practices to this Plan including supporting reference documents relating to their effect on East Grinstead; therefore, my comments are very much limited as per the following – i.e.:

**'an allocation for a Science and Technology Park to the west of Burgess Hill'** – how will this be affected by the reduced office working due to the Corona Virus and more employees working from home in future re. the proposed 7 employment sites Science and Technology Park?

**The purpose of the Examination is to determine whether the Site Allocations DPD is 'legally compliant' and 'sound'** – does this mean that what is being proposed not 'legally compliant' and 'sound'??

**The document is required to ensure the provision of homes, jobs and infrastructure, that have already been agreed to in the District Plan, are delivered. This will ensure we can continue to rely on the District Plan to deliver sustainable growth and so ensuring the Council fulfils its obligations . . . w.r.t. the four main aims** – how will and when will MSDC amend this proposal taking the impact and effects of the Corona virus into account which could produce an overall saving for residents?

**SA4: Copthorne Land north of the A264 at Junction 10 of M23** – it would appear that this is well underway prior to asking for comments in this document?

**SA18: Former East Grinstead Police Station:**

- a) with the potential increase in local population, why has this draft omitted to re-establish a permanently staffed Police Station replacing the so part-time Police Hub to support residents where present police support is remote – more people will statistically increase local crime??
- b) **Land owner has expressed an interest in bringing the site forward for development** – who is the Land Owner?
- c) **Optimise the development potential of the site through the provision of apartments of no more than 2½ storeys taking account of potential development opportunities that exist immediately**
- d) **beyond the site boundaries to ensure future redevelopment opportunities are not hindered** – why has the amount of available land for future developments have not been specified nor specifying any restriction that may be applicable from the Covenant Land that require compliance?
- e) **any necessary mitigation is undertaken to the rear of the site adjacent to Blackwell Hollow** – this requires further explanation;
- f) **Biodiversity and Green Infrastructure** – who will be responsible for authorising and accepting a monitoring role through construction?

**SA20: Land South and West of Imberhorne Upper School –:**

- a) **'a high quality and sustainable extension to East Grinstead'** – how is this 'subjective term' defined in terms of affordability for people living in East Grinstead?
- b) the closeness of this construction to the existing location will make a significant increase in local impact on traffic adding to existing cumulative usage of between 31-39,000+ vehicles annually through A22/A264 road junctions now reduced in width by the Cycle Lane where cyclists now have to fear challenges from adjacent HGV vehicles;
- c) **Retain and enhance existing established trees and other landscape features and weave them into green infrastructure / open space / movement strategy that encourages pedestrian and cycle use** – what policing and punitive consequences will be legally incorporated in agreements to ensure the above is protected?
- d) **Ensure the site maximises connectivity with the existing settlement and services within East Grinstead and utilises a permeable layout throughout** – does this mean that the existing services will be

added to facilitate this development, if so, what residual capacities are available to accept these added loadings?

- e) **Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity overall. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where this is not possible, mitigate and as a last resort, compensate for any loss** – this appears to be a 'get-out' clause which should be mitigated/avoided as part of the Design prior to granting Consent at the outset;
- f) **Highways and Access** – the existing peak-time traffic congestion/tail-backs should not be added to by this Development as the situation is gruelling at present;
- g) **Utilities** – see 'd)' previous.

**Site Allocations Development Plan Document: The Sites DPD allocates additional development sites to meet the residual necessary to meet the agreed housing requirement for the plan period as reflected in the District Plan 2014-2031. The additional allocations are in accordance with the Spatial Strategy and Strategic Policies set out in the District Plan** – what does this mean . . . why not use 'Plain English'

**The District Plan 2014-2031 and Sites DPD will be used to inform decisions on planning applications across the district, in conjunction with any DPDs relating to minerals and waste prepared by West Sussex County Council and any 'made' neighbourhood plans prepared by the community** – when have MSDC promoted this making residents fully aware that this opportunity was/is available via. <https://www.midsussex.gov.uk/planning-building/neighbourhood-plans/>?

#### **Access and highways:**

- **Ensure development contributes towards delivering sustainable development and appropriate infrastructure in accordance with District Plan Policy DP21: Transport and the objectives of the West Sussex Transport Plan 2011 – 2026.**
- **Provide a Transport Assessment and Sustainable Transport Strategy to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it.**
- **Highway infrastructure mitigation is only considered once all relevant sustainable travel interventions (for the relevant local network) have been fully explored and have been taken into account in terms of their level of mitigation.**
- **Identify how the development will provide safe and convenient routes for walking and cycling through the development and linking with existing networks beyond. Create a permeable road network within the site with clearly defined route hierarchies.**
- **Safeguard Public Rights of Way (PRoW) and protect their amenity.**
- **Provide adequate car parking in accordance with District Plan Policy DP21: Transport.**

How for how long will the above remain valid given the propensity to accelerate the use of home working, the increased introduction of electric vehicles with power supplies and a reduced workforce?

**Employment projections are based on a number of factors and so they are sensitive to change, such as changes in the jobs and employment market and the impact of national policy/legal interventions such as Permitted Development for office to residential conversions.<sup>8</sup>**

Office to residential conversions increases the need for adequate off-road vehicle parking and electric charge points – has this been included?

**District Plan Policy DP1: Sustainable Economic Development that supports the delivery of an average of 543 jobs per year and allocates 25 hectares of employment land at Burgess Hill to the east of Cuckfield Road to assist meeting this requirement.** This is purely speculative to support a hypothesis to increase development.

**Table 2.3: District Plan Housing Requirement (updated)** – there is insufficient evidence to support these figures including the expected level of affordability given the present and future state of the economy and how demographic stability will support this hypothesis here and elsewhere in the document.

**SA18: Former East Grinstead Police Station - 22 dwellings;**

**SA19 Land South of Crawley Down Rd – 200 dwellings;**

**SA20 Land South and West of Imberhorne Upper School – 550 dwellings.**

The density of infill building in East Grinstead in recent years has brought the Town to gridlock at main times with more to come in the pipeline from Hill Place Farm and Imberhorne Lane, with inadequate parking facilities, the political loss/manipulation of CIL monies for the benefit of the Town, the use of the artificial planning figure of 1.7 vehicles per dwelling, insufficient medical/dental facilities, the adding to poor air quality, etc., which is proving difficult to see the compatibility with the aims/objective referred to in **Para 2.38 Individual applications for the site allocations should be accompanied by . . . . .**

**2.39 Community involvement and consultation is key to ensuring that appropriate facilities are identified and designed to meet the needs of those who will use them. Community engagement and involvement is also**

***essential for ensuring that new residents integrate with existing communities.*** This is virtually impossible for a Community to fully achieve given the mass of prerequisite knowledge and familiarity required with the volume of dedicated/specific knowledge (bordering on systems of manipulative jargon) in order to fully appreciate and participate!

In conclusion. As an East Grinstead resident, I have reservations as to the perceived imbalance between the affordability local housing (when I have seen local property being Globally advertised) and the loadings imposed on the infra-structure, which I have previously questioned under the Freedom of Information that remain unanswered in part. In my opinion, there is too much detail to fully assimilate from which to construct a quality response to describe the 'impact Vs benefit' of this Plan that will be affected by the present set of economic circumstances for some time to come. Perhaps a non-political working party of lay people may also have been constructive that would have better insight into the workings of constructing this Plan.

Yours sincerely,

Leo Beirne.

**1421**

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA4

**ID:** 1421

**Response Ref:** Reg19/1421/1

**Respondent:** Ms S Bostel

**Organisation:**

**On Behalf Of:**

**Category:** Resident

**Appear at Examination?** x

<b>Name</b>	Sara Bostel
<b>Respondent ref. number</b>	SA4
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	SA4
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Sound
<b>Please outline why you either support or object (on legal or soundness grounds) to the Site Allocations DPD</b>	<p>OK, so there are over 100k people now without work thanks to the pandemic - definitely more to follow, that's a given...who is going to be able to buy these houses and with what? Some decided to take the mortgage holiday and have now lost employment leading to potentially serious problems for these people. Shipley Bridge Lane has already been closed in part 4 times in order to put in a new access to the development, which then needed to be altered 3 further times. I also reluctantly accept that whilst the initial site application is legal, I do wholly question whether this subsequent application is. The area in question was promised to be left "as is" in order for the village to maintain identity and unaffected by the development of Heathy Wood. This is clearly now a renege on the agreed arrangement. May I also draw your attention to The Clock Field development at Turner's Hill, which still isn't finished after 2 years - can't blame that solely on C19! That links in with my 1st point which raises the concern that new developments are taking longer to sell and therefore financial unsustainable. This area particularly is widely acknowledged as now being an area in crisis, which will only get worse as furlough ends in October. I do not believe there is the infrastructure in place either. Doctors, schools, roads (which are in a dreadful state) are at capacity. Access to local hospitals and all services have been reduced and diminished over the years</p> <p>- now is not the time to extend this site. There are 10s of thousands of boarded up properties up &amp; down the length of the UK, so surely now is the time to renovate these and regenerate these towns. Local authority moneies will be better spent (and thus a better return) offering grants/contracts to would-be homeowners to relocate and renovate a good solid home.</p>
<b>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.</b>	<p>Simply, do not extend the existing site - it's not necessary. DO NOT RENEGE ON THE AGREEMENT.</p>
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	

<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	09/08/2020



1457

## Site Allocations DPD: Regulation 19 Consultation Response

**Policy:** SA4

**ID:** 1457

**Response Ref:** Reg19/1457/1

**Respondent:** J Day

**Organisation:** Copthorne Village Association

**On Behalf Of:**

**Category:** Organisation

**Appear at Examination?** x

<b>Name</b>	Joy Day
<b>Organisation</b>	Copthorne Village Association
<b>On behalf of</b>	Copthorne Village Association Membership
<b>Address</b>	[REDACTED]
<b>Email</b>	[REDACTED]
<b>Name or Organisation</b>	Copthorne Village Association
<b>Which document are you commenting on?</b>	Site Allocations DPD
<b>Sites DPD Policy Number (e.g. SA1 - SA38)</b>	Document SA4: Land north of the A264 at Junction 10 of M23 (Employment Area)
<b>Do you consider the Site Allocations DPD is in accordance with legal and procedural requirements; including the duty to cooperate</b>	Yes
<b>(1) Positively prepared</b>	Unsound
<b>(2) Justified</b>	Unsound
<b>(3) Effective</b>	Unsound
<b>(4) Consistent with national policy</b>	Unsound

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

Dear Sirs,

Site Allocations DPD (Regulation 19) Consultation August/September 2020  
Document SA4: Land north of the A264 at Junction 10 of M23 (Employment Area)  
The Copthorne Village Association represents households in and around the village of Copthorne. Our membership is extremely concerned and feel most strongly that proposing a developable area of 2.7ha with allocation for employment land within use classes B1 (Business/Light Industrial and B8 (Storage and Distribution) is totally inappropriate for this site and should not be taken forward.

We urge this site is not proposed for any development whatsoever, especially not the industrial units suggested.

Please take into account the following valid reasons:

The site is critically important as a green, tree planted area providing the perception of separation between Crawley and Copthorne and shielding the development to the north from any view from the A264.

This was a major factor stressed by the applicant, St Modwen, when the whole site was being proposed. Their master plan design and access statement figure 1.6 shows very clearly how this space would be retained as green space and planted with additional trees (46 as per the approved Reserved matters application DM/17/4875, of the 152 trees to be planted across the whole site).

As officers will be aware, the approval at committee for this whole site (application 13/04127/OUTES) was gained by a majority of only one. The consistent guarantee from both the applicant and officers that the development would be shielded from view by this green space to retain the perception of separation between Copthorne and Crawley was THE key factor in obtaining this approval.

The following are just some of the statements in the officer's report to that committee:

1) from the Executive Summary - "...within the strategic gap between Copthorne and Crawley...the applicants have tried to be respectful.... in identifying.....areas of strategic landscape planting. The main point being the perception of the gap". This statement is repeated verbatim in the officer's Planning Balance / Conclusion statement on page 32 of his report.

2) from page 22 of the report, Landscape Impact / Coalescence with Crawley - "The character area is considered to have a high value because much of it has retained a distinctive rural character" and from page 23 "It is appreciated that the proposed development will erode the space between the western side of Copthorne and the M23/Crawley. However, the perception of this erosion will not, in your officer's opinion, be apparent on the ground to any significant degree" BECAUSE "The structural planting to the south" (i.e. on the space now being proposed as SA4) ".....are important elements in reaching this view."

3) Condition 15 of the approved application requires details of the landscape management plan to be approved before work commences and this was the subject of the planting plan approved in the reserved matters application DM/17/4875 already referred to.

The CVA have made investigations and sought advice, we cannot find any subsequent application or amendment to that approval.

In addition we have been advised by a member (previously he held the positions of Worth Parish and Mid Sussex District Councilor) that he was in receipt of a personal letter from Colin Darby, Planning Manager for St Modwen Properties PLC, on official St Modwen headed paper. Colin Darby was the lead representative for St Modwen in all its proposals and presentations to both MSDC and Worth Parish Council. In his letter he includes a paragraph headed "A sensitive, sustainable development". The paragraph contains the following: "From the outset, St Modwen has sought to respect the rural character and setting of Copthorne and its environs. As such, the proposals retain the majority of the site as green and open space." ... "The undeveloped, retained open land would be dedicated to ensuring a strong sense of separation, preventing any perception of coalescence with Crawley. LANDSCAPING AND CAREFUL LAYOUT WILL ENSURE NONE OF THE NEW HOMES WOULD BE VISIBLE FROM THE A264 (I have put text into capitals)

We wish to draw this to your attention as it is quite abundantly clear that St Modwen never intended this green space to be anything other than a green space with trees in order to maintain the perception of separation and shield the new development from view.

The Copthorne Village Association are appalled and outraged that MSDC intend now to drive a coach and horses through that guarantee and the statements in the officer's report by proposing to allow industrial units be sited on that area! This would be not only a total dishonouring and complete reversal of the assurances given above but would destroy any sense whatsoever of the perception of separation and the rural character so assiduously repeated by MSDC officers and St Modwen.

Such units would:

be clearly visible from the A264,

be an eyesore and blot on the landscape which could not be hidden.

Be totally out of keeping with the rural character.

As such, the site is absolutely not worthy of being considered for any development other than as a green, tree planted space.

It has been brought to our attention and we urge you consider that In addition to the above reasons for rejecting this site, it can be demonstrated that there is no requirement for such units in the area, as follows:

In April 2011 a full application (10/03093/FUL) was approved for the construction of 32,000 sq ft of B1 and B2 units (10 units) at Acacia Grove, Copthorne Common Road RH10 3PD (behind Woodside Garage). It also provided 100 parking spaces of which 11 were for disabled users.

This application was supported by neighbouring properties and approved by committee. However, it has never been implemented as it transpired there was no demand for such units in and around Copthorne. This site is less than 200m (as the crow flies) from the SA4 site where B1 and B8 units are proposed.

Please consider as there was no demand for these units in the intervening years at a time when Gatwick business was expanding, with the current (and probably long-lasting, especially as BA has suspended its Gatwick operations indefinitely) decrease in activity, it is highly likely that the requirement for such units is even lower than it was nine years ago and, as no other such developments have been sought in Copthorne during that time, it is quite clear the demand is not there.

The CVA membership trust you will give this your full consideration and request that this site (SA4) is not considered any further as an allocation for employment land.

Joy Day  
Copthorne Village Association

<b>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.</b>	as above
<b>If you wish to provide further documentation to support your response, you can upload it here</b>	
<b>If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination</b>	No, I do not wish to participate at the oral examination
<b>Please notify me when-The Plan has been submitted for Examination</b>	yes
<b>Please notify me when-The publication of the recommendations from the Examination</b>	yes
<b>Please notify me when-The Site Allocations DPD is adopted</b>	yes
<b>Date</b>	14/09/2020