Written Statement

On behalf of Indurent Limited (previously St Modwen Developments)

February 2026

Turley

Introduction

1.1 This Written Statement is submitted on behalf of Indurent Limited (formerly St. Modwen Developments) ("Indurent") in response to the Inspector's Matters and Issues for Examination, specifically Matter 4 concerning business and industrial needs.

1.2 Indurent has an interest in a 4.31ha site on land to the north of the A264 Copthorne ("the site" or "Gatwick Middle Field"), which is considered suitable, available, and deliverable for employment-led development, thereby capable of contributing to the District's identified need for industrial/logistics space.

1.3 This Statement responds to the following issues under Matter 4:

(a) Existing commitments and whether the Plan makes sufficient provision for business and industrial needs; and

(b) The approach to distribution, including strategic distribution.

1.4 Indurent's Regulation 19 representations (February 2024) included a comprehensive Employment Land Assessment ("ELA"), which identified significant shortcomings in the Council's employment evidence base. Those remain unaddressed in the Council's topic paper MS-TP3: Employment (January 2026).

1.5 While we note that the Council has commissioned a "*focussed update*" to the 2022 Economic Growth Assessment Update ("EGAU"), anticipated for completion by 13 February 2026, it is regrettable that this updated assessment was not available prior to the preparation of hearing statements. It is assumed that the Council will have at least taken what is clearly an opportunity to address the issues that we previously raised, to ensure that its approach can be found sound when assessed against the National Planning Policy Framework ("NPPF") (2023).[1] A response to the Council's focussed update will be provided at the Hearing.

1.6 We also acknowledge the Council's apparently positive stance in responding to the outcome of this update within MS-TP3, where it affirms an intention to respond to evidence of further or higher employment land needs within its hearing statement[2]. In the context of our previous submissions and the continued evolving positive economic and market context, as well as the Government's stance on facilitating and supporting economic growth, we would anticipate such a positive response being required.

[1] It is accepted that the Plan is being examined against the policies in the December 2023 Framework, in accordance with the transitional arrangements set out in the December 2024 NPPF. It is nonetheless noted that the latter, or indeed its forthcoming replacement on which the Government is currently consulting, will be material considerations in determining any planning application that would be submitted following adoption of the District Plan. Reference is therefore made also to their contents where appropriate

[2] MS-TP3: Employment (January 2026), paragraph 4.4

Matter 4: Meeting Business and Industrial Needs

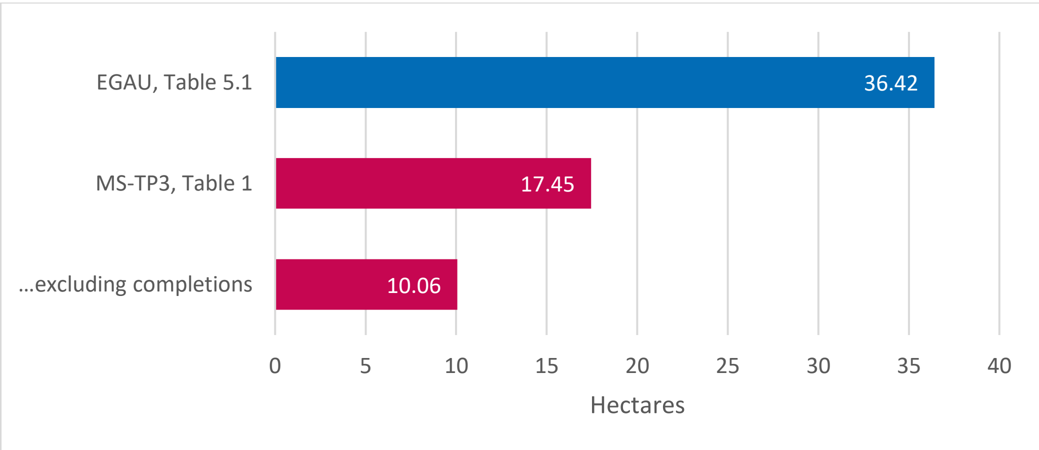
Issue 4(a): Existing commitments and whether the Plan makes sufficient provision for business and industrial needs

1.7 MS-TP3 confirms that there was believed to be "*no outstanding residual employment need*" when the Submission Draft District Plan (SDDP) was prepared, based on the EGAU (ED2). This identified a requirement for 27.1ha of employment land over the period from 2021 to 2038, against a committed supply of 44.3ha in April 2021, representing an apparent oversupply of 17.2ha.

1.8 MS-TP3 does though clearly accept that the forthcoming "*further update*" to the EGAU could "*indicate that further employment land needs to be found*"[3].

1.9 This could be due simply to the supply having diminished in the near-five years that have now passed since April 2021. Table 5.1 of the EGAU confirmed that existing allocations formed most of the supply at that point (36.42ha) but some 70% of this land then had planning permission, so were set to build out, and Table 1 of MS-TP3 suggests that existing allocations now offer less than half as much land (17.45ha). Even this appears to be an overestimate, since only 10.06ha is reported as not being "*complete*".

Figure 1.1: Reported Land Available at Existing Allocations



Source: ED2; MS-TP3

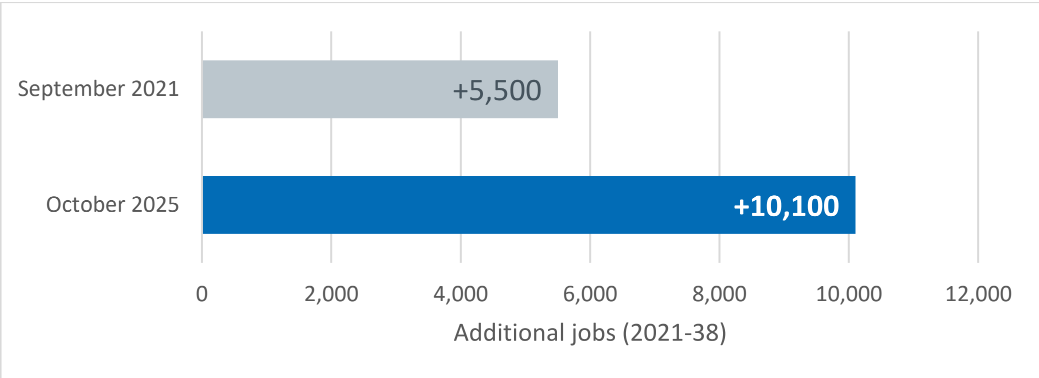
1.10 The four undeveloped allocations that remain are also relatively small, each averaging around 2.5ha in size, but even this more than halves to only 1.0ha when excluding the largest site of 7.0ha. The ELA expressed similar concern around a committed supply that was then spread across 29 sites, almost two thirds (62%) of which offered less than a hectare of land. Such a fragmented supply would severely limit the District's ability to accommodate larger modern logistics operations, in the way that Gatwick Middle Field – which is larger than all but four of the committed sites identified in the ELA – would.

[3] MS-TP3: Employment (January 2026), paragraph 4.4

Paragraph 4.13 of the ELA noted its ability to accommodate an industrial unit larger than all but one of those existing in Mid Sussex.

1.11 Aside from supply, and in line with our previous submission, we also expect the forthcoming update to the EGAU to acknowledge that needs have continued to increase, potentially by a substantial amount. It is understood to be taking the "*latest economic outlook*" into account, amongst other things, with the Council having indicated that a newer forecast from Experian will be used. The latest such forecast[4] – developed in October 2025 – is known to be far more optimistic than the version from September 2021 that was used in the EGAU, envisaging almost twice as many new jobs in Mid Sussex.

Figure 1.2: Comparing Experian Forecasts for Mid Sussex (2021-38)



Source: Experian

1.12 It is also known to be more optimistic on the prospects of the logistics sector, which the NPPF now explicitly recognises as being integral to a "*modern economy*"[5]. The Government's Industrial Strategy – the importance of which is acknowledged in the Council's own Sustainable Economy Strategy, which notably commits to supporting "*spatial clusters of growth-driving and emerging sectors*"[6] – likewise recognises how logistics makes a "*vital contribution to the UK economy… ensuring that the right goods are in the right place at the right time*"[7].

1.13 While the EGAU assumed that the logistics sector would create no more than 90 jobs[8] – even after allowing for additional labour – the latest Experian forecast anticipates almost four times as many, some 330 in total[9]. This would alone be expected to generate a need for 5.6ha of employment land, based on the assumptions used in the EGAU[10].

---

[4] Experian (October 2025) Local Market Forecasts Quarterly

[5] MHCLG (December 2024) National Planning Policy Framework, paragraph 86c

[6] **ED6**

[7] HM Government (November 2025) The UK's Modern Industrial Strategy, p89

[8] **ED2**, paragraphs 4.8 and 4.19

[9] Experian (October 2025) Local Market Forecasts Quarterly. This counts 79% of jobs in the wholesale sector and 67% of jobs in land transport, storage and post, aligning with the assumptions that are understood to have been made in the EGA which are detailed in Appendix 7 of the original study for the whole of Northern West Sussex (**ED1**)

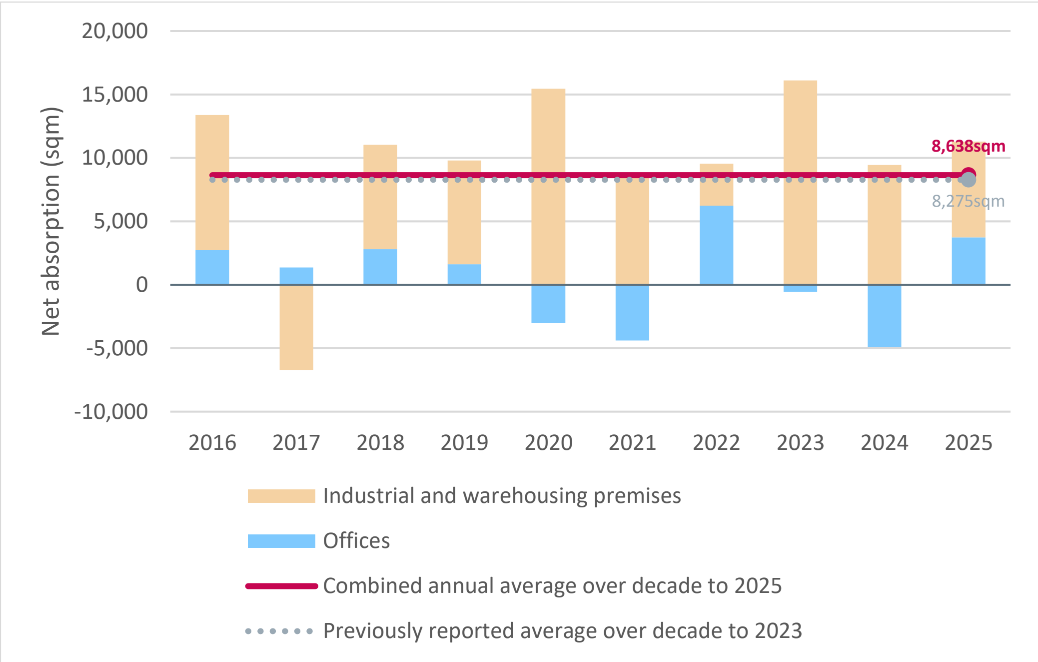
[10] **ED2**, paragraph 4.10

1.14 This does though represent only a "*labour demand*" scenario, taking no account of the *supply* of labour that could be available if planned housing is delivered. The EGAU raised the prospect of almost three times as many jobs being created as was then forecast, if the minimum need suggested by the standard method was to be met[11]. It is believed that an equivalent scenario to that which produced the uppermost estimate of a need for 27.1ha of employment land in the EGAU – taken forward in the SDDP – will be presented in the "*focussed update*" that will shortly become available[12].

1.15 It appears that an updated scenario based on past take-up will also be presented, this having previously sat within the range formed by the "*labour demand*" and "*labour supply*" scenarios in suggesting that circa 20.8ha of employment land could be needed between 2021 and 2038. It is unclear whether there has been a resolution to the quality issues that led the EGAU to warn against the use of this scenario, but if not, it is assumed that consideration will have been given to alternative sources of information as was previously encouraged by our ELA.

1.16 It highlighted "net absorption" data that is available for instance from CoStar, recording move-ins net of move-outs and thus being a valuable measure of demand. The latest such data indicates that demand for commercial space has modestly risen since the ELA was produced, focusing on the decade to 2023, with there also having been even more of an emphasis on industrial and warehousing premises over offices[13].

Figure 1.3: Net Absorption in Mid Sussex (2016-25)



Source: CoStar; Turley analysis

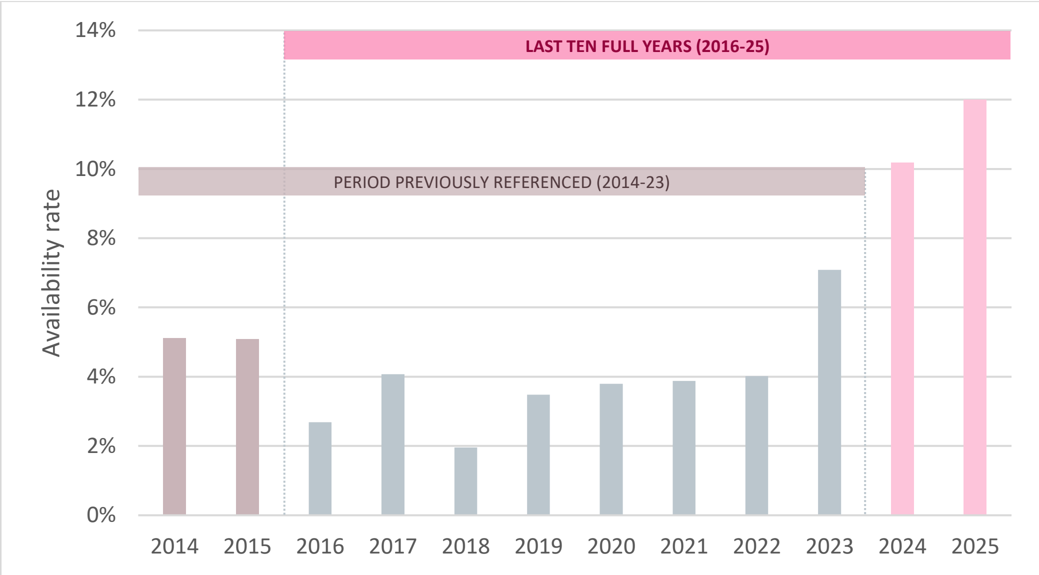
[11] *Ibid*, paragraph 4.18

[12] **MS-TP3**, paragraph 2.9

[13] Circa 93% of net absorption over ten years to 2023 related to industrial premises and warehouses, but this has risen to 94% over the equivalent decade to 2025

1.17 The ELA did though highlight the prospect of demand for industrial and warehousing premises having been suppressed by limited availability during much of the period that it drew upon. This remains a risk even with the situation having improved over recent years, as allocations and other consented schemes have been built out.

Figure 1.4: Availability of Industrial Premises and Warehouses in Mid Sussex



Source: CoStar; Turley analysis

1.18 Paragraph 3.11 of the ELA explained how allowance can be made for the extra space that could have been taken up if more industrial and warehousing premises were available in the years with limited supply, using an approach promoted by the British Property Federation[14]. This suggests that some 13,796sqm could have been taken up annually over the last decade if the lowest rates had been brought up even to the average recorded in this time (5.1%).

1.19 Extrapolating this over a plan period that is now proposed to run from 2021 to 2040, and again adding a five-year buffer that is reasonable and in line with best practice, would suggest that some **344,558sqm** of employment space is needed in Mid Sussex as shown by Table 1.1 overleaf. This could require some **83.8ha** of employment land based on the assumptions reasonably used in the EGAU, far surpassing even its uppermost estimate of need (27.1ha) over what was admittedly a slightly shorter period to only 2038.

[14] BPF and Savills (2022) Levelling Up – the Logic of Logistics

Table 1.1: Using Past Absorption to Estimate Demand

	Offices	Industrial and warehousing premises	Total
Total net absorption (2016-25)	5,609	80,773	**86,382**
Total suppressed demand	0	57,183	**57,183**
Total demand (2016-25)	**5,609**	**137,957**	**143,566**
Average annual demand	561	13,796	**14,357**
Extrapolated over 19 years	10,657	262,118	**272,775**
Five-year buffer	2,804	68,978	**71,783**
Total with buffer (2021-40)	**13,461**	**331,096**	**344,558**
Land required (ha)	**1.0**	**82.8**	**83.8**

Source: CoStar; Turley analysis

1.20 Such a level of need evidently far exceeds even the supply of 44.3ha that the EGAU reported as of April 2021, which is itself believed to have rapidly diminished making the shortfall even greater. Having been produced in the belief that there is no such shortfall, Indurent maintain that the SDDP makes entirely insufficient provision for business and industrial needs and thus remains unsound.

Issue 4(b): Approach to distribution, including strategic distribution

1.21 It is acknowledged that under the transitional arrangements the District Plan is being examined under NPPF 2023. Paragraph 83 of this iteration of the NPPF established the expectation that planning policy should recognise and address the specific locational requirements of different sectors, which included *"for storage and distribution operations at a variety of scales and in suitably accessible locations".*

1.22 Previous submissions highlighted a concern that the evidence base and the District Plan failed to adequately account for market evidence of the locational requirements of the logistics sector in Mid Sussex. This was manifest in the evidence presented through ED2 expressing a need for only 1.8ha (7,160sqm) of land for storage and distribution (B8).

1.23 As referenced in response to Issue 4(a), the economy and national policy context responded to structural changes in the logistics sector. The Government's Industrial Strategy, referenced above, is clear to highlight the critical national significance of the sector in facilitating national economic growth ambitions. This has been reflected in the current iteration of the NPPF, with paragraph 87 expressly requiring planning policies to "*mak[e] provision for… storage and distribution operations at a variety of scales and in suitably accessible locations.*" Paragraph 86 requires policies to be "*flexible enough to accommodate needs not anticipated in the plan*" and "*enable a rapid response to changes in economic circumstances.*"

1.24 As considered below evidence of an erosion of the supply of land able to accommodate the requirements of the logistics sector and increasing demand and occupier requirements undermines the failure of either Policy DPE1 or Policy DPE3 of the SDDP to contain any specific provision for, nor recognition of, the particular locational requirements of storage and distribution uses. This represents a clear departure from national policy and fails to respond to current economic and market needs.

1.25 As highlighted in previous submissions, the absence of strategic policy provision for storage and distribution uses is underpinned by flawed assumptions in the underlying evidence base, discussed in response to Issue 4(a).

1.26 The EGAU also erroneously assumes that a forecast decline of 7.7ha in general industrial (Class B2) floorspace will free up existing sites for Class B8 uses. Even if such a decline was to materialise, existing sites cannot be re-purposed easily given modern occupiers' highly specific locational and operational requirements. It also cannot be assumed that the projected -9.0ha deficit in light industrial floorspace can be offset by simply increasing the supply of new "mixed B1" floorspace. This is because the market more typically delivers – or co-locates – light industrial floorspace (Class E(g)iii) alongside general industrial (Class B2) and storage and distribution uses (Class B8) as part of larger, flexible industrial-led schemes, rather than as part of office-led "mixed B1" schemes.

1.27 These policy and evidence base shortcomings are emblematic of a broader failure to recognise and capitalise upon the potential for Mid Sussex to be a strategic location for storage and distribution development. The District clearly benefits from a strategically important location within the Gatwick Diamond, with excellent connectivity via the M23 to London, the South Coast ports, and Gatwick Airport.

1.28 The importance of Gatwick Airport, and its expansion ambitions – reflected in the establishment of the Airport Economic Zone – is acknowledged in the Council's latest Sustainable Economic Strategy for the period from 2025 to 2028 (ED6). It expressly states *that "the zone will promote long-term economic development, and this Council will ensure that its businesses and residents' voices are heard within this new partnership"*[15].

1.29 Whilst it ultimately underestimates the need for logistics land, the EGAU did acknowledge the rapidly changing and growing occupier interest in the sector. It firstly observed, in the context of the market in 2021/2022, that *"the recent market trends and commercial space developments for logistics means Mid Sussex District may capture future growth opportunities accelerated by the Covid-19 pandemic and the public health response"*[16].

1.30 It was also clear to observe in its concluding recommendations that *"the pace of employment development has accelerated recently, driven in particular by industrial and storage and distribution sectors, with Mid Sussex becoming increasingly popular with occupiers seeking locations close to the A23 and potentially that could not be accommodated in areas such as Manor Royal in Craley and locations closer to Gatwick"*[17].

1.31 The above market insights appear to <u>contrast profoundly</u> with the conclusion in Table 5.7 of ED2 that there was an identified need for only 1.8ha of land for storage and distribution use over the entire period to 2038. This conclusion is completely unfounded given that up to four times as much land is believed to have been developed in the space of only four years[18].

1.32 Despite these inherent locational advantages and more recent evidence of strong take-up, however, the Plan fails to provide sufficient site allocations and policy provisions to capitalise upon this opportunity. Gatwick Middle Field is located directly within this area of identified growing commercial market demand for land to accommodate strategic distribution needs.

1.33 The Plan's failure to allocate specific, available and suitable sites for storage and distribution use, instead relying on an assumed over-supply based on flawed forecasting, is particularly concerning in light of the "flexibility" requirements set out in Paragraph 86 of the NPPF. In recent years, the logistics sector has experienced structural transformation driven by online retail growth, supply chain reshoring/nearshoring, and increasing demand for last-mile delivery infrastructure. Mid Sussex's strategic location positions it to benefit significantly from this growth, and play a key role in supporting the priority sectors outlined in the Government's Industrial Strategy, yet the Plan provides no policy framework to capture these opportunities nor respond to changing market demands.

[15] **ED6**, page 9

[16] **ED2**, paragraph 2.21

[17] **ED2**, paragraph 6.8

[18] Table 1 of **MS-TP3** indicates that three of the existing allocations that featured in the supply cited in the EGAU, as of April 2021, are now complete having been earmarked for B8 use (SA4/SA6/SA7). These sites collectively totalled circa 7.4ha

Conclusion

1.34 For the reasons set out above, the evidence base behind, and Policies DPE1 and DPE3 of, the SDDP are considered to be unsound with respect to employment provision.

1.35 In order to ensure that it is sound, in accordance with the requirements of Paragraph 35 of the NPPF, the Plan must allocate additional employment land to address a shortfall that could amount to some 39.5ha. It must also make specific provision for strategic distribution uses to reflect the District's locational advantages, and allocate (available, deliverable and suitable) sites capable of accommodating larger-scale logistics units to address the qualitative gap in supply.

1.36 As set out in previous consultation stages, Gatwick Middle Field represents a deliverable opportunity that would address all three of these requirements simultaneously. The site would contribute c.4.3ha toward the identified shortfall, provide a strategically located employment site which benefits from direct access to the M23, and is capable of delivering a unit substantially larger than any other available in the District. Crucially, the site would also provide accessible local employment opportunities for residents of neighbouring Heathy Wood and Copthorne – supporting the creation of a balanced, sustainable community – and be deliverable within five years.

Word count: 2,188 words

Turley Office
London

020 7851 4010