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# Appendix 3

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## Employment Land Needs in Crawley

## Appendix 3

Gatwick Green: Employment Land Need

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### Contents

1.	Introduction	1
2.	Crawley Local Plan	3
3.	Crawley Employment Land Evidence Base	6
4.	The Role of Airports in Local Economies	8
5.	Crawley Property Market Update	12
6.	Conclusion	17

## 1. Introduction

- 1.1.1. Crawley Borough Council (CBC) published in January its Consultation Draft Local Plan 2020-2035 (hereon referred as draft Local Plan). This uses an updated evidence base that reviews the current and future need for employment land (B use). The updated study has been undertaken by Lichfields and was published in January 2020.
- 1.1.2. The NPPF states the following about the preparation or review of all policies.
- “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals” (paragraph 31)*
- 1.1.3. This appendix reviews the method and the results of this study to conclude on the future employment land need included in the draft Local Plan.
- 1.1.4. The appendix is structured as follows:
- Section 2 lists the main employment centres in Crawley and sets out the employment land need in the adopted and consultation draft plans.
  - Section 3 reviews the method and results of the Northern West Sussex Economic Growth Assessment (EGA) Update.
  - Section 4 focuses on the role of airports in local property markets.
  - Section 5 provides a market update for B uses in Crawley and concludes on the employment land need.
- 1.1.5. This appendix concludes that Crawley should plan for at least 70.2 ha of employment land over the short term to address the historic under supply of employment land and pent-up unmet demand. This means a minimum employment need over the short term of 58.2 ha after taking account of the 12 ha of total employment land already identified in the Employment Land Trajectory. This employment land can be provided in North Crawley, in particular at Gatwick Green, following the release of land previously safeguarded for a second runway at the airport. Given the extent of the unmet need, there is a case to consider the allocation of Gatwick Green in the short term to address these requirements. The strong viability characteristics identified in Appendix 5 to the representation on the Employment Land Trajectory means the site could come forward relatively quickly and at the necessary scale to meet current unmet market demand.
- 1.1.6. The proposed North Crawley AAP will address any justified needs of the airport alongside Crawley’s other unmet socio-economic needs over the longer term related to meeting the requirements derived from the Borough’s labour supply and identified in the EGA as 113 ha. It is considered that the labour supply-derived need should be treated as a minimum longer term need (policy-off) given that it takes no account of wider considerations as required by PPG, such as market signals, wider economic trends, the influence of the airport and regional economic policy objectives (policy-on). A longer-term need taking account of these considerations will need to be used to meet in full Crawley’s objectively assessed housing and population growth requirements and improve Crawley’s employment retention rate.

## Appendix 3

### Gatwick Green: Employment Land Need

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- 1.1.7. The allocation of Gatwick Green can offer up to 58.7 ha of employment land and we believe it represents a suitable site of regional / nation significance in a location sought after by commercial investors and occupiers. Failure to plan positively can jeopardise the economic growth of the wider area due to Crawley's important position and affect the growth aspirations of the Coast to Capital (C2C) Local Economic Partnership (LEP), particularly as many other LEPs and Local Planning Authorities in other parts of England are seeking to bring forward major commercial investments in highly accessible locations nearby to airports.
- 1.1.8. This submission should be read in conjunction with Savills Regulation 19 representations on behalf of the Wilky Group and the Savills Gatwick Economic Development Area Market Analysis Report (November 2018) which was referenced in representations on behalf of the Wilky Group at the Regulation 18 stage.

## 2. Crawley Local Plan

2.1.1. This chapter describes Crawley's main economic centres and comments on its employment land need.

### 2.2. Main Economic Centres

2.2.1. The draft Local Plan identifies Gatwick Airport as one of the three key economic centres for Crawley alongside Manor Royal and Crawley Town Centre. Crawley's local economy depends significantly on Gatwick Airport with 75% of Crawley's employment being in distribution, hotels, transport, communications, banking and finance sectors which have strong links with airports. Gatwick Airport generates approximately 25,000 direct jobs accounting for 26.5% of the total jobs in Crawley. The draft Local Plan states that 26.9% the airport's employees are Crawley residents.

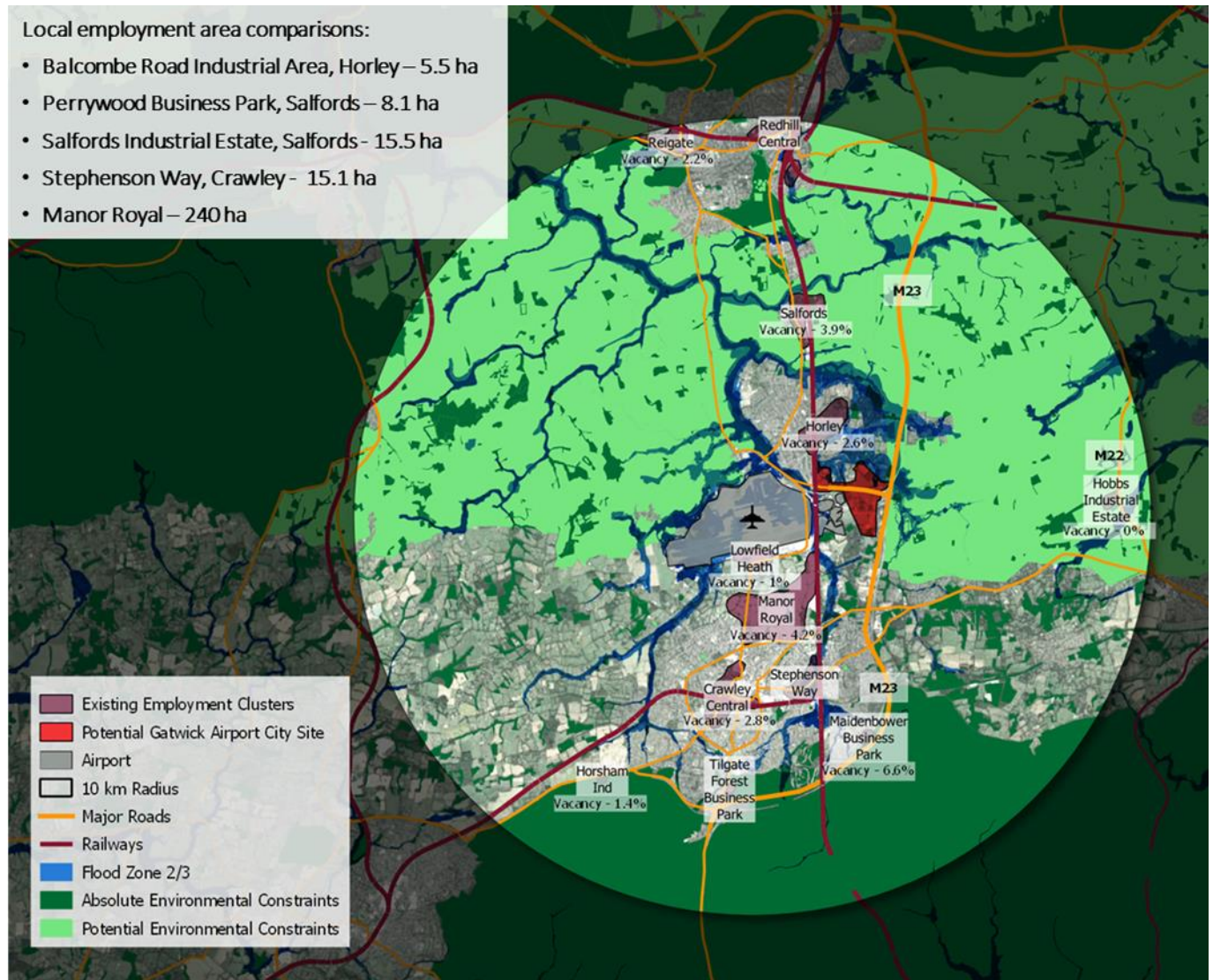
2.2.2. Manor Royal is identified in the draft Local Plan as one of the largest business parks in the South East region covering a total of 240 hectares and is home to more than 600 businesses and over 32,000 jobs. These account for 40% of Crawley's total number of jobs. Manor Royal provides 77% of Crawley's employment land and since its official naming in 1950, it has evolved and diversified its employment offer from its traditional manufacturing base. Manor Royal was the last major business park developed in Crawley and since 1950 it has replenished its stock without significant outward growth. However, the draft Local Plan suggests that there are still present opportunities in Manor Royal for employment land re-use and intensification to deliver net floorspace gains and support of Crawley's economic development. The draft Local Plan also supports minor extensions to manor Royal under Policy EC1, provided these don't prejudice the wider development of the AAP area: these sites would be very modest in scale and there is some uncertainty as to whether such sites will come forward.

2.2.3. The success of Manor Royal is testament to the benefits of its location nearby the airport and the M23. It attracts the highest average rents for better quality premises in the region, £23.20 per sqft for offices and £13.50 per sqft for industrial. It is one of the largest employment areas in the region as shown on **Figure 1** below. The Gatwick Green site is located in a more prominent and visible location with respect to the M23 and location directly adjacent to the Airport and Gatwick's rail station underpins its high level of connectivity, so underlining its strong viability as an employment location.

## Appendix 3

### Gatwick Green: Employment Land Need

Figure 1 Locally significant clusters of economic activity



Source: Wilky Group and the Savills Gatwick Economic Development Area Market Analysis Report, November 2018

### 2.3. Employment Land Need

- 2.3.1. In terms of employment land the adopted Local Plan (2015) identifies a significant shortfall of 35 ha of employment land with the identified land of 23 ha being sufficient only for the early part of plan period (2015-2030). The adopted Plan states that strategic growth could be constrained if additional land cannot be identified in Crawley.
- 2.3.2. For this reason, the adopted Local Plan makes provision for a thorough sequential assessment of employment site options once a final decision has been made by the Government on UK airport expansion and safeguarding. These options will focus first in the north of the Borough.

- 2.3.3. The draft Local Plan (2020) post-dates the decision to build a third runway at Heathrow airport to meet the runway capacity needs of the South East until 2050. One of the main aims of the draft Local Plan is to identify enough employment land to support Crawley's economic growth in the short term, with the balance to be addressed in the North Crawley AAP. The evidence base, explained in detail below, identifies a minimum need for 33 ha of employment land with only 12 ha of this need being currently identified in the Employment Land Trajectory. This leads to a shortfall of 21 ha of employment land. For reasons set out in this paper, it is considered that the Council's land requirement significantly underplays the real need for new employment land in Crawley over the short term.
- 2.3.4. The draft Local Plan identifies the potential of addressing this shortfall by identifying land north of Manor Royal and east of Gatwick Airport for an AAP to be undertaken following adoption of the draft Local Plan. The Council commits to produce the North Crawley Area Action Plan (AAP) to address the above unmet needs and ensure airport development is properly considered alongside other needs. The proposed timing of the AAP will undoubtedly result in further uncertainty regarding how, when and where future employment land needs are to be satisfied. In order to capture the commercial investment Crawley so desperately needs, the draft Local Plan needs to provide certainty by way of new employment land allocations. If it does not, important investment may be lost, not just from Crawley but the region as a whole. No other area in the region provides the benefits of adjacency to the UK's second largest airport; visibility from the region's major movement corridor (M23), and direct servicing from one of the most connected railway stations in the country (Gatwick Airport station serving over 129 destinations directly).

## 3. Crawley Employment Land Evidence Base

3.1.1. This chapter sets out the assumptions and results of Northern West Sussex EGA Update.

### 3.2. Results

3.2.1. The Northern West Sussex EGA Update recommends that Crawley should consider the past take-up base requirement of 33 ha of employment land as a minimum. The EGA states that this would enable historically strong levels of employment development to continue in the Borough over the new plan period: in reality, those past rates have been significantly constrained by the poor land supply as a result of safeguarding as paragraph 9.9 of the DCBLP acknowledges.

3.2.2. **Table 1** below summarises the results of the Northern West Sussex EGA Update under each scenario with the recommended scenario being the use of past development rates.

*Table 1 Indicative Gross Land Requirements by Scenario to 2036 (ha)*

Use	1. Baseline Job Growth	2. Past Development Rates	3. Baseline Labour Supply
Offices (B1a/B1b)	5.6	4.5	8.9
Manufacturing (B1c/B2)	-6.0	28.5	19.2
Distribution (B8)	-0.7		84.9
All B Uses	-1.1	33.0	113.0

Source: Northern West Sussex EGA Update, January 2020

### 3.3. Assumptions

3.3.1. Northern West Sussex EGA Update states that the commercial property is relatively self-contained with most of business space enquiries coming from within the region. However, the assessment also states that Crawley continues to attract strong levels of demand from multinational firms and local businesses. Therefore we believe that Crawley and in particular the major employment locations near the M23 and Gatwick Airport, such as Manor Royal and the potential Gatwick Green site, are not self-contained. These locations are nationally and regionally significant in terms of their market attractiveness for commercial uses, which means they attract demand from further afield on top of strong local demand.

3.3.2. The EGA also states that continuing strong demand for commercial space in Crawley is down to the town's highly competitive infrastructure and communications offer linked to an international airport, including good motorway connections and rail links to London and the South Coast. The importance of the Airport is also clear given the size and success of Manor Royal as Crawley's, and the region's, major employment location.

3.3.3. The assumptions for each of the above scenarios are detailed in the EGA and summarised below:

- **Baseline Job Growth:** This scenario is based on employment forecast for the area provided by Oxford Economics which is then translated into employment floorspace with the use of the Employment Density Guide (HCA, 2015).



## Appendix 3

### Gatwick Green: Employment Land Need

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- Past Development Rates: This is based on net construction completions of employment floorspace provided by Crawley Borough Council.
- Baseline Labour Supply: This scenario uses the population growth associated with the planned housing provision and identifies the floorspace needed for a certain proportion of the economically active population in the future to be retained within Crawley.

3.3.4. These scenarios are then turned into employment land need with the use of the following plot ratios.

- Industrial (B1c/B2/B8): 0.4 plot ratio
- Office (B1a/B1b): assumed half of the new floorspace will be in lower density development with a plot ratio of 0.4 and half in higher density locations with a plot ratio of 2.0.

3.3.5. Based on our analysis, we do not consider the first two scenarios above to fully capture local market signals. This is due to:

- The Baseline Job Growth is based on Oxford Economics employment forecasts which capture future growth trends as currently estimated. However, the role of the Local Plan is to positively and proactively encourage sustainable economic growth. Therefore we consider the use of current employment forecasts inadequate to serve the above purpose, especially considering the historic shortfall of employment land in Crawley.
- Past Development Rates take into account historic trends since 2011 in Crawley's constrained market based on low floorspace availability and limited new land being allocated for development. Also the 'look back' period adopted covers the aftermath of the Global Financial Crisis, which suppressed demand well below historical averages. Further, this approach takes no account of the Airport's predicted 50% growth from 46.5 to 72.0 million passengers per annum (mppa) over the plan period to 2036. Due to these reasons, the scenario does not adequately cover the future potential of the local economy.

3.3.6. The baseline labour supply scenario focuses on employment land needed to serve the forecast workforce growth and is based on the employment retention rates assumption in the Northern West Sussex Strategic Housing Market Assessment (2019). Crawley reported a low employment retention rate in 2011 with 40% of people working in Crawley being also Crawley residents.

3.3.7. We believe that the two most appropriate scenarios for gauging future employment land need are:

- A property market demand forecast that builds on the current constrained supply of employment land and takes into account a growing Airport. The details and results of this approach are provided in Chapter 5.
- The baseline labour supply scenario described above, but only as a longer term minimum. This is because allocating employment land in attractive locations such as Gatwick Green should increase local employment retention, further increasing the need for employment floorspace as the increasing local labour force (associated with future housing growth) seeks to work locally.

## 4. The Role of Airports in Local Economies

### 4.1. Gatwick Airport

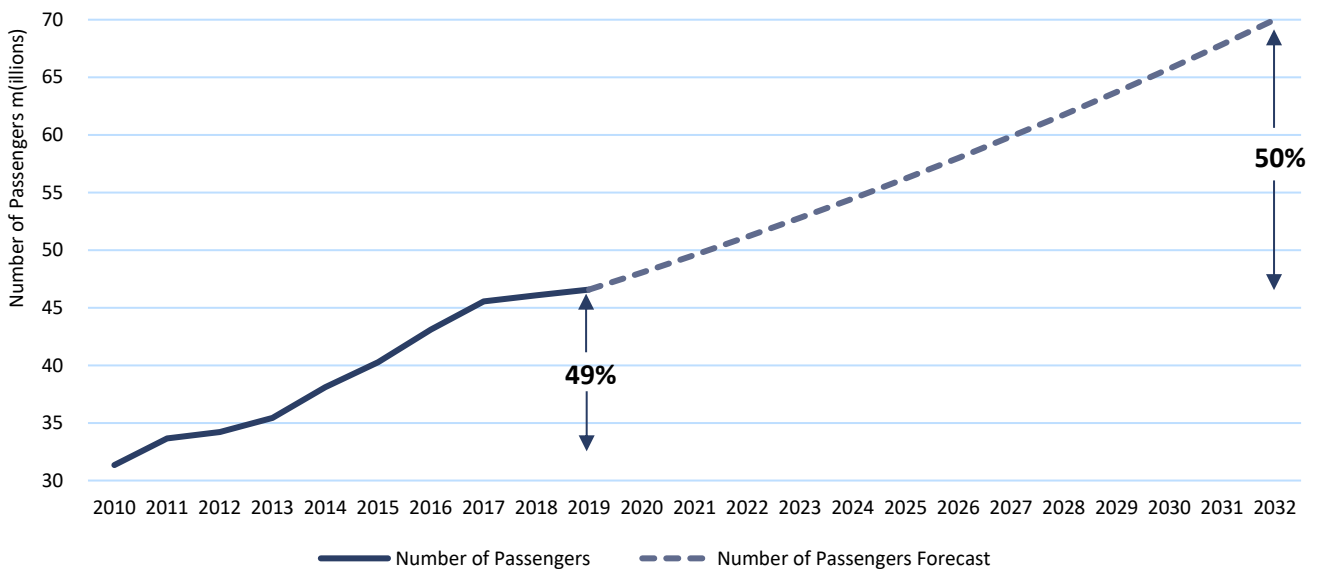
- 4.1.1. Airports have always been important economic generators for the local and regional economies within which they are located. However, in more recent times they have transformed from a facility with the sole purpose of transportation to one which offers an array of services and amenities, including shops, restaurants, hotels and entertainment. This recognises that airports can perform beyond its traditional aeronautical services to obtain high amounts of revenue (40-60%) through non-aeronautical revenue, as well as catalysing numerous real estate opportunities in the areas surrounding them, such as hotels, offices, medical facilities and more. In response, the 'Airport City' concept has emerged in many airports across the world and its applicability to Gatwick Airport was reviewed extensively in the Savills Gatwick Economic Development Area Market Analysis Report (November 2018).
- 4.1.2. Within this report, a number of key European Airports were reviewed to help understand how commercial development is responding to airport growth. These case studies help to demonstrate that the 'Airport City' concept is real and is being aggressively pursued in Europe and throughout the world whether it be a 20 million or 70 million passenger airport. A clear correlation has been established between growth in passenger numbers and freight volumes and the ability of airports to attract new commercial development, both in terms of larger companies as well as certain business sectors that are attracted to the agglomeration benefits of an airport location.
- 4.1.3. Accordingly, adjacency to Gatwick Airport is considered to be crucial to maximising the economic and investment opportunity for commercial uses in particular. Focusing development activity where it will be in most demand and achieve the highest values should enable 'new commercial uses at Gatwick Green to best contribute to wider infrastructure needs of the region, sub-region and Borough. The majority of future infrastructure requirements will benefit both the Airport and Gatwick Green and therefore offer investment and utilisation efficiencies that will also serve the transport sustainably objectives of the Council.
- 4.1.4. Finally, there is a lack of alternative development sites in the wider region of this scale with as strong motorway and rail accessibility, not to mention adjacency to a large and growing international airport. As outlined throughout the Savills Gatwick Economic Development Area Market Analysis Report (November 2018) and presented in **Figure 1** above, existing employment clusters within a 10 km radius of Gatwick Airport are relatively small in size at between 5 to 15 ha versus 59 ha for Gatwick Green. Manor Royal is the exception at 240 ha, but it is restricted from growing its footprint under current and emerging Local Plan policy. The existing employment areas within a 10 km radius of the Airport have limited land and floorspace availability to accommodate the strong future commercial floorspace demand identified in this report. Gatwick Green represents a prime opportunity to accommodate this future demand alongside a growing Gatwick Airport.



4.1.5. The importance of Gatwick Airport is acknowledged by the C2C LEP, which identifies it as the single biggest driver of economic growth in the area. Its influence is especially important to the M23 corridor. C2C encourages the collaboration of planning and strategic authorities around Gatwick to maximise the economic potential of the area around the airport. The excellent public transport and road connectivity of the airport, and the lack of planning constraints on much of the land around it (provided the airport safeguarding is removed), make it an ideal anchor for further development of business space and housing, both of which are in acute demand in the area. By developing the economic infrastructure around the airport, the airport and its zone of influence can benefit not only Crawley, but the wider sub-region and region.

4.1.6. **Figure 2** below shows that the historic number of passengers flying from and to Gatwick airport. The number of passengers has grown by 49% over the last nine years. This is equal to a compound annual growth rate of 4.5%.

Figure 2 Number of Passengers



Source: Department for Transport Statistics Table TSG0202b (AVI0102b), Gatwick Airport Master Plan 2019

4.1.7. Gatwick Airport published its final master plan in 2019. This proposes significant growth through the use of its existing runways and states that it is no longer actively pursuing plans for an additional runway. This master plan forecasts 70 million passengers by 2032 based on bringing the standby (emergency) runway into regular use for departing aircraft. This is a 50% growth over 13 years and is equal to a high compound annual growth rate of 3.2%.

### 4.2. UK Airports and Commercial Floorspace

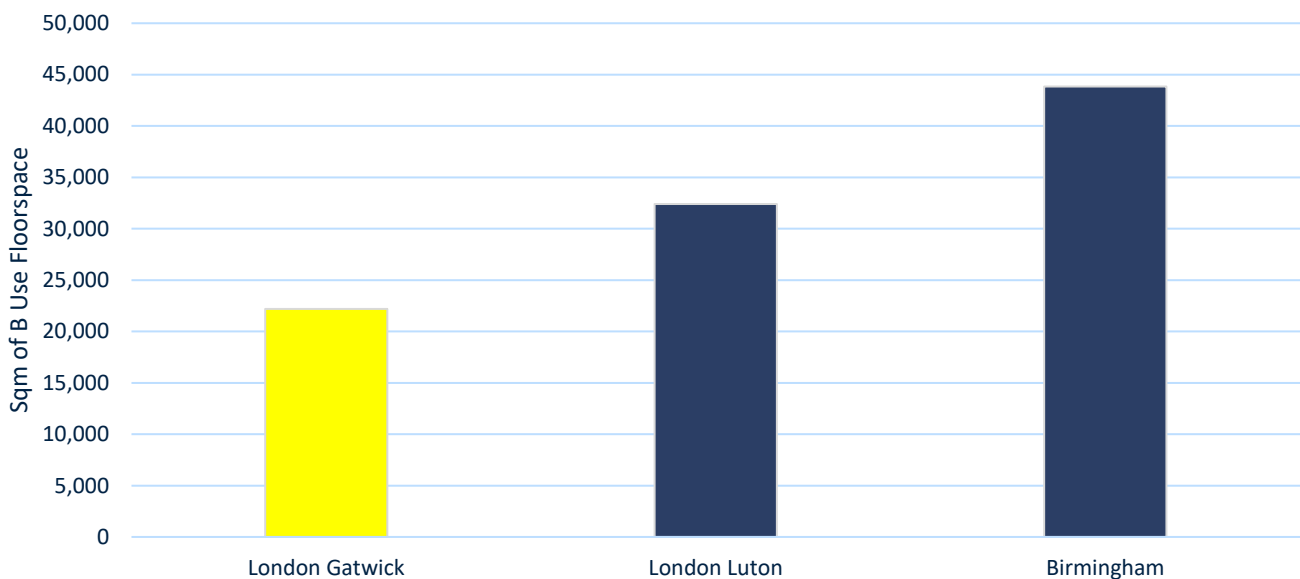
## Appendix 3

### Gatwick Green: Employment Land Need



4.2.1. **Figure 3** below shows the existing provision of B use floorspace per million of passengers within a 2 mile radius from key UK airports. This shows Luton and Birmingham having a higher provision per million passengers than Gatwick Airport, illustrating the under provision of B use floorspace in Gatwick's zone of influence. This is 32% less than London Luton and 49% lower than Birmingham, despite these being much smaller airports.

Figure 3 Existing B Use Floorspace Provision per Million Passengers



Source: CoStar 2020, Department for Transport Statistics Table TSGB0202b (AVI0102b)

4.2.2. Outline permission was granted some years ago to deliver Century Park, a 70 acre commercial development east of London Luton airport. The park is part of the London Luton Airport Enterprise Zone, supported by South East Midlands LEP. The enterprise zone is anticipated to deliver up to 7,200 new jobs and attract inward investments to support economic growth across the sub-region. More recently, the airport has commenced work on a Development Concept Order (DCO) application to permit the airport to expand from c 18 mppa to about 32 mppa, alongside the provision of a similar scale of adjacent commercial development to that envisaged by the Century Park proposal, but reconfigured to enable a viable arrangement.

4.2.3. As shown on **Figure 2**, Birmingham Airport has high access to employment floorspace with Birmingham Business Park (60 ha), Elmdon Trading Estate (17 ha) and Jaguar Land Rover Solihull (105 ha) being within a two-mile radius from Birmingham Airport. The draft local plan of Solihull identifies the airport's area as unique with the potential to deliver major growth on a nationally significant scale both to meet the economic growth aims of the Borough as well as the wider growth aspirations of the Greater Birmingham and Solihull LEP and the West Midlands Combined Authority. The same plan identifies land for employment at Damson Parkway to allow for the future expansion of Jaguar Land Rover.

## Appendix 3

### Gatwick Green: Employment Land Need

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- 4.2.4. It is evident from these two examples how airports are being viewed by their respective local planning authorities and LEPs as major economic drivers for attracting further economic activity. Therefore, its vitally important Crawley Borough Council and C2C LEP take the opportunity to identify the potential of the zone of opportunity at Gatwick and allocate prime employment land at Gatwick Green now that the draft Local Plan review has removed blanket safeguarding from the land east of the airport. If the Council does not seize the opportunity to harness the economic potential of a growing Gatwick Airport, the economic downsides will be felt both in Crawley Borough and more widely in the region.



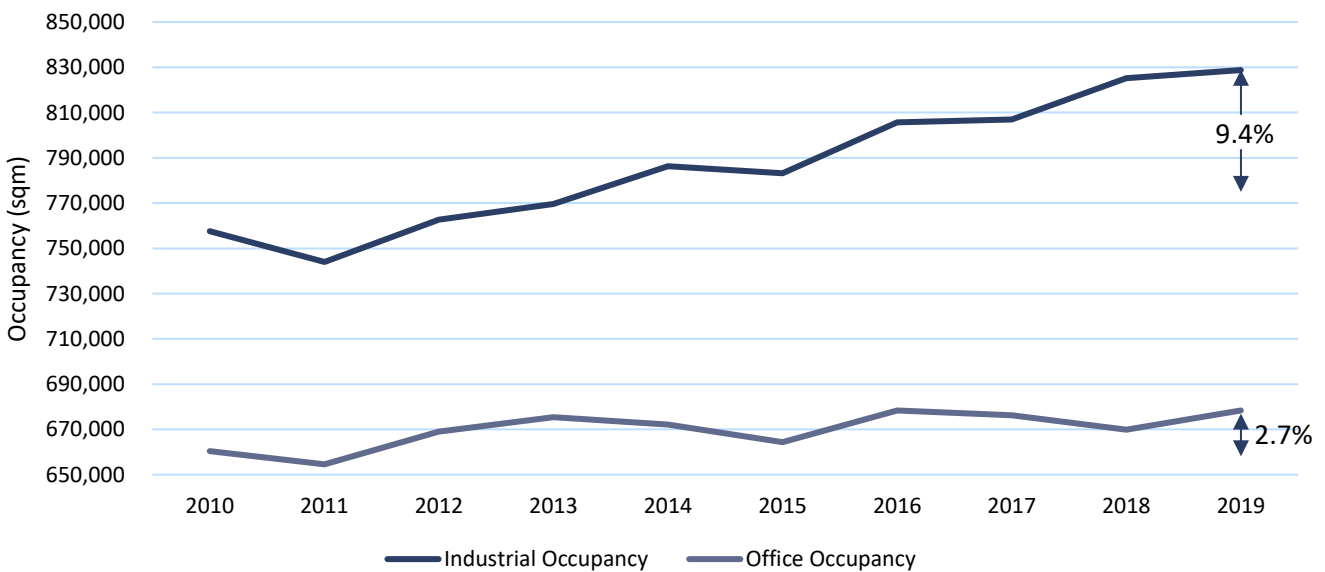
## 5. Crawley Property Market Update

5.1.1. This section analyses occupancy levels for office and industrial floorspace in Crawley and presents a set of forecast scenarios that demonstrate the Council baseline need of 33 ha represents an underestimate of true need.

### 5.2. Historic Trends

5.2.1. This section provides a market update on B use floorspace in Crawley. **Figure 4** below shows occupancy growth in Crawley for industrial and office uses. This shows that occupancy has grown by 9.4% and 2.7% since 2010 for industrial and office space, respectively. This is a much lower growth once compared with the growth of passenger numbers in Gatwick Airport over the same period. Passenger numbers have grown by 9.4%, while employment floorspace has grown by only 2.7%, presenting a clear mismatch. This clearly reflects the consequence of Crawley not being able to meet its employment land needs in its adopted Local Plan, which identified a 35 ha deficit.

Figure 4 Office and Industrial Occupancy in Crawley



Source: CoStar 2020

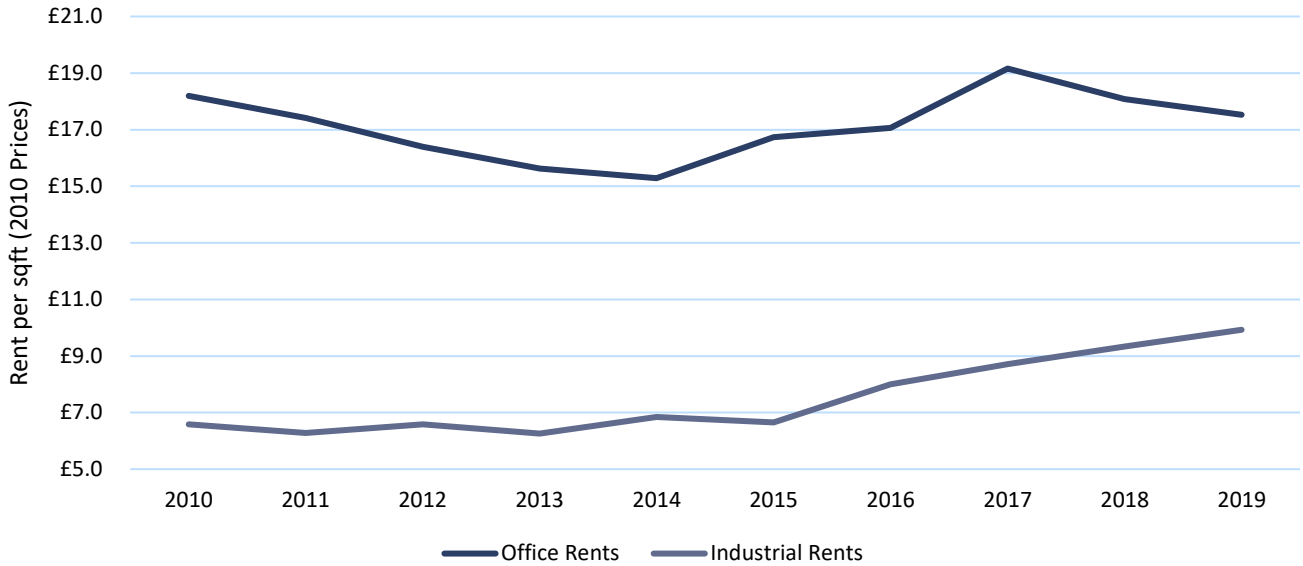
5.2.2. **Figure 5** below shows average rents per sqft for office and industrial uses in 2010 prices. These rents exclude inflation and show that in real term, rents have grown significantly for industrial (50% increase) and remain relatively stable for office. This shows a potential constrained supply of industrial floorspace in particular.

# Appendix 3

## Gatwick Green: Employment Land Need



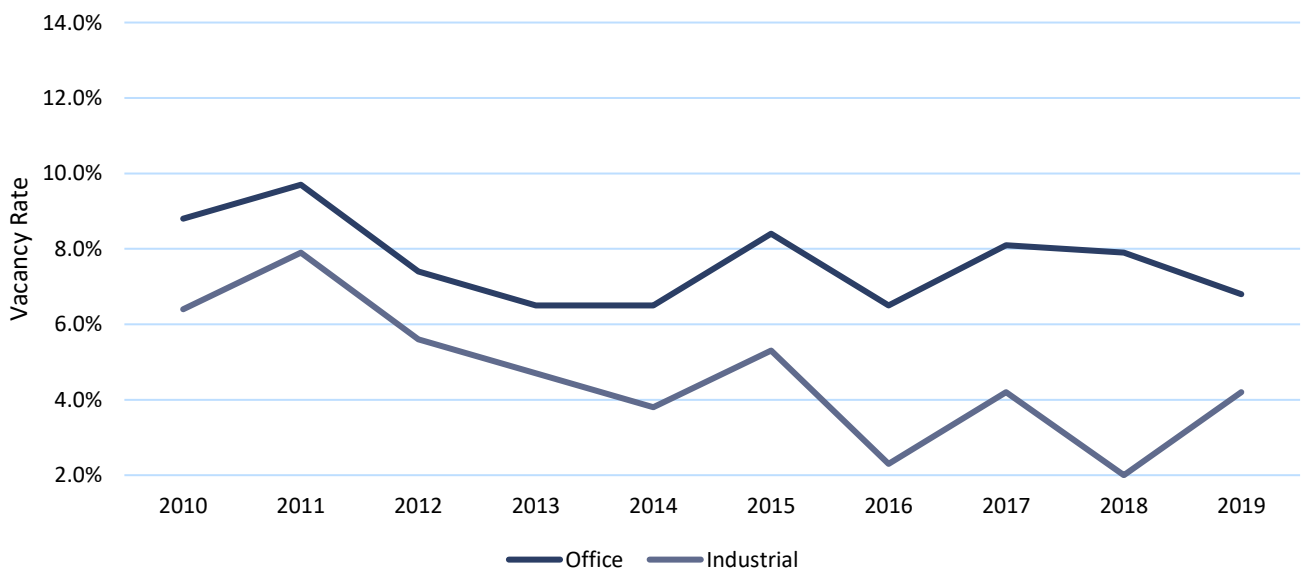
Figure 5 Office and Industrial Real Rents per sqft in 2010



Source: CoStar 2020

5.2.3. **Figure 6** below shows the vacancy rates in Crawley since 2010 for office and industrial uses. Overall vacancy rates follow a decreasing trend and are currently lower than the frictional vacancy rate of eight per cent used in the London Plan (2016). This is evidence of a very tight employment land and floorspace market.

Figure 6 Office and Industrial Availability Rate



# Appendix 3

## Gatwick Green: Employment Land Need

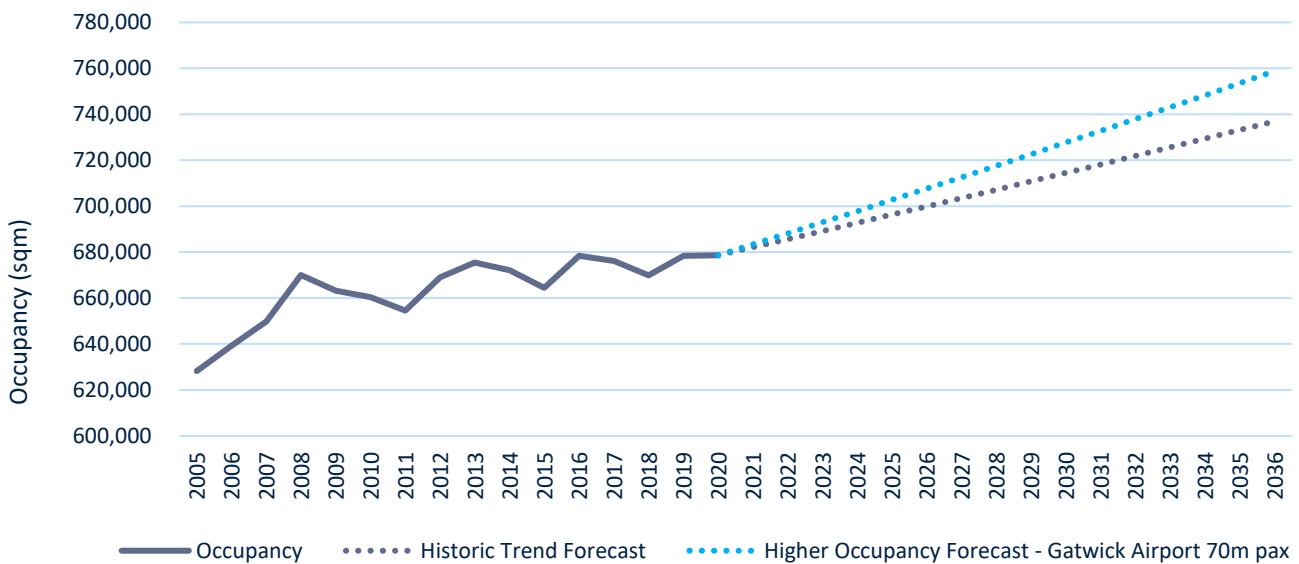


Source: CoStar 2020

### 5.3. Projected Trends

5.3.1. **Figure 7** below shows historic office occupancy for Crawley and two forecasts. The first forecast uses the compound annual growth rate since 2005 (0.5% per annum) to project occupancy by 2036 whereas the other scenario takes into account the fact that historic occupancy is floorspace / land constrained and assumes a higher annual growth rate (0.7%) due to the airport’s planned growth to 70 million passengers per annum.

Figure 7 Crawley Office Occupancy and Forecasts



Source: CoStar 2020, Savills 2020

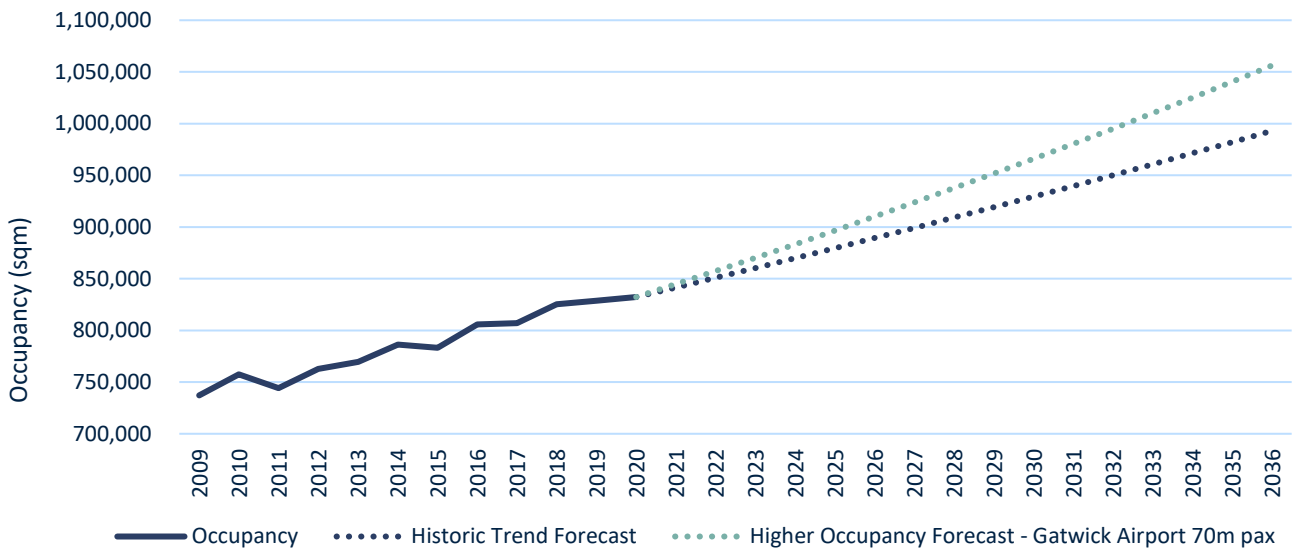
5.3.2. The above scenarios suggest an office occupancy uplift of 67,000 and 89,000 sqm by 2036. Once this is converted to employment land by using the plot ratio assumptions noted in **Section 3.3**, we forecast a need for 10.0-13.3 ha of land for office only.

5.3.3. Figure 8 below shows historic industrial occupancy and two forecast scenarios. One uses the compound annual growth rate since 2009 (1.1%) and the other uses a higher annual growth rate (1.5%) taking into account that past occupancy trends are land / floorspace constrained and the airport’s planned growth to 70 million passengers per annum.

5.3.4. The above industrial occupancy scenarios result into an occupancy uplift of 164,000 and 228,000 sqm. Once this is converted to employment land using the plot ratio assumptions noted in **Section 3.3**, we identify a need for 41.0-56.8 ha of land for industrial only.



Figure 8 Crawley Industrial Occupancy and Forecasts



Source: CoStar 2020, Savills 2020

### 5.4. Minimum Employment Land Need

- 5.4.1. Once the unconstrained industrial and office forecast needs noted in Section 5.3 are taken into account, we estimate that the additional employment land needed is between 51.1 ha and 70.2 ha. This shows that by looking at historic trends of a constrained market, a higher need for additional employment land (51.1 ha vs 33.0 ha) can be justified. This is due to our forecasts using a longer period and an indicator (occupancy vs net completions) that more directly reflects market signals.
- 5.4.2. However, we consider the Crawley property market to be constrained and historic trends not to be a suitable basis to proactively plan for economic growth. We therefore recommend using the higher growth rates that reflect better the unconstrained function of Crawley’s market and additional potential from Gatwick Airport’s projected passenger growth.
- 5.4.3. We therefore recommend that the Plan should allocate at least 70.2 ha of employment land over the shorter term to meet historic unmet market demand. A higher minimum figure based on the baseline labour supply scenario should be adopted over the longer term to take account of the planned future housing growth to 2036.
- 5.4.4. Gatwick Green can offer a new mixed-use commercial development that will likely attract substantial new investment and jobs. The site can cover a mix of uses including office, industrial (warehousing and distribution), hotels and training and education components. Office and hotel developments are likely to benefit the most from proximity to the station and airport terminals. Whereas, warehouse and distribution uses should benefit from convenient access to the Strategic Road Network.

## Appendix 3

### Gatwick Green: Employment Land Need

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- 5.4.5. Demand for additional hotels at Gatwick Airport is likely given the forecast passenger growth. Higher and further education investments are based on clear locational preferences and wider trends concerning government funding, visa requirements for attracting international students and demographic trends.

## 6. Conclusion

- 6.1.1. LEPs use airports as key economic drivers to attract further economic activity near them. The importance of airports in the wider economy is also shown by the support that others and Gatwick Airport receive from LEPs. These rely on areas near airports to support economic growth in their regions. Failure to plan positively can jeopardise the economic growth of the wider area due to Crawley's important position and affect the economic growth of C2C LEP.
- 6.1.2. This appendix reviews the evidence base assessing the employment land needs for Crawley. The recommended minimum land requirement of 33 ha is found to be inadequate to proactively support future economic growth in Crawley over the short term as it is based on historic trends of a constrained property market.
- 6.1.3. Our analysis of Crawley's property market area concludes that Crawley should plan for a minimum of 70.2 ha of employment land over the shorter term and identify additional sites to address the current minimum shortfall of 58.2 ha. This employment land can be provided in North Crawley, in particular at Gatwick Green, following the release of the safeguarded land around the airport. The Gatwick Green site is available, deliverable and viable and should be taken forward as a strategic employment allocation by the Council through the draft Local Plan review / North Crawley AAP. The allocation of Gatwick Green can provide up to **58.7 ha of employment land and cover the minimum current shortfall identified above.**
- 6.1.4. Over the longer term, the North Crawley AAP must address the longer term economic needs of the area. As a minimum, this should be 113 ha to 2036 based on the 'policy-off' baseline labour supply scenario identified in the Council's EGA. We consider this to be a longer term 'minimum' need given that the new employment allocations will help improve the current low local labour retention alongside the growth in the labour supply itself (associated with new housing).

## Appendix 3

### Gatwick Green: Employment Land Need

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