



## **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				

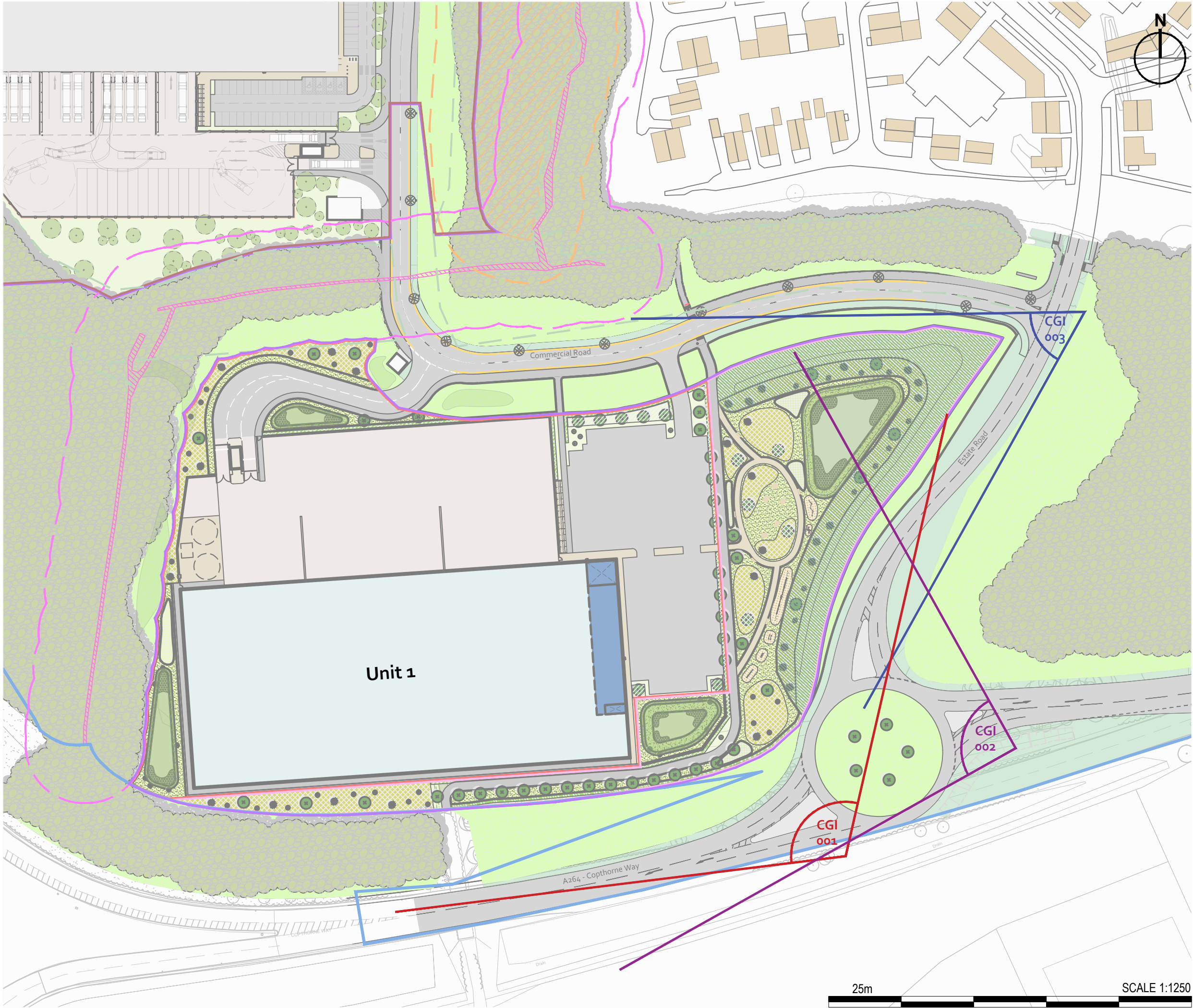


  
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Date:	03.08.2020
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St. Modwen Drawing Ref:	Revision:
Drawing no: <b>19226 SK0001</b>	<b>A</b>





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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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19226 SK0002	A



