

Dave Barber
Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

BY EMAIL TO: newlocalplan@warwickdc.gov.uk

21124/A3/RPP/RAP

27th June 2014

Dear Mr Barber,

REPRESENTATIONS TO THE DRAFT PUBLICATION WARWICK DISTRICT LOCAL PLAN, JUNE 2014

We write on behalf of our Client, One Hundred Percent Properties as owners of the former Honiley Airfield, Oldwich Lane, Wroxall. One Hundred Percent Properties welcomes the opportunity to make representations on the Draft Local Plan, conscious that the former Honiley Airfield has significant potential to contribute towards meeting the emerging needs of the District over the plan period.

Background

You will be aware that part of our Client's land is identified as a Major Developed Site (MDS) within the Green Belt which currently benefits from two planning permissions. The first is for a vehicle testing facility (Ref: W/2002/0762) that also permits vehicle demonstrations and driver training, dating back to 2002. The second is an extant planning permission (Ref: W06/0309), known as "The Fulcrum" for B1(b) use on the site to support a specialist automotive Research and Development facility which is the most recent consent, and was subject to an extension of time application (Ref: W10/0893) in 2011.

Pre-application discussions with Officers have been taking place to discuss the submission of all the reserved matters and discharge of pre-commencement conditions, with a view to implement the permission this year.

Section 1 – Introduction, Vision and Objectives

We support in principle the acknowledgement made by the Council at paragraph 1.26 that Advanced Manufacturing and Engineering is particularly important as a key employment sector, and have identified the former Honiley Airfield site as an important investment site which has the potential to be unlocked through improved infrastructure. This is in line with paragraph 7 of the NPPF which sets out that "*..the economic dimension of sustainable development requires the planning system to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure...*".

Strategic Policy DS1 – Supporting Prosperity

We acknowledge paragraph 1.26 of the Plan, but object to Policy DS1 and the strategy to provide for the existing and future needs of businesses at the local and sub-regional level by providing sufficient

and appropriate employment land within the District. The Policy will not meet the Council's vision, unless further employment land is allocated over the Plan period.

The Coventry and Warwickshire Local Enterprise Partnership (CWLEP) Strategic Economic Plan (March 2014) in section 102 (Employment Sites) sets out that the availability of employment land is fundamental to attracting new investors, retaining local businesses and reshoring of manufacturing. They have prioritised a portfolio of sites and their readiness, of which our site (referred to as Fen End) is one. CWLEP will work with investors and developers to identify priorities, freedom and flexibility to support the future development of the site.

The CWLEP investment priorities beyond 2015/2016 will be R&D growth and developing sites such as Fen End/Honiley Airfield. The Strategic Economic Plan forms part of the evidence base for the Draft Local Plan, but its observations on the growth sectors in the District and sub-region have been ignored in the development of the policy. These Plans should be complimenting each other to ensure that there is an appropriate strategy moving forward.

Within the Plan paragraph 3.43 specifically looks at the site (referred to as Fen End) in more detail and the infrastructure funding that is required. The site is identified as providing a key opportunity to unlock additional R&D provision supported by a critical test track facility. Development of the site will complement the growth of other key automotive sector employment with test tracks such as (JLR) Gaydon and MIRA. The location of the site offers a discreet setting for R&D activities and track testing, and although located away from the north/south corridor, it has good connections to Birmingham International Airport, the Birmingham to Euston rail link and major motorway networks. The site will also benefit from planned investment to creating Kenilworth station and the Stanks junction on the A46. The extant permission could provide up to 1,706 additional jobs in the sub-region and 1,612 of which would be on-site.

The Coventry and Warwickshire City Deal has already released £559,000 of funding to Warwick District Council for highway upgrades scheduled in 2014/2015, and there is to be additional funding released for initial utilities upgrades in late 2015 (following the completion of Phase 1 of the extant planning permission). As well as physical infrastructure, the CWLEP are seeking a capital investment of c£1.25m to enable the provision of superfast broadband to the site.

The level of investment and growth committed by the CWLEP supports the site's importance in providing economic benefits to the District and sub-region. We welcome this investment and identification of growth and believe that the site can contribute significantly.

We refer below to the economic need to extend the proposed designations on the Former Honiley Airfield site.

Policy DS8 – Employment Land

We object to Policy DS8 which seeks to provide a minimum of 66ha of employment land over the plan period. The Warwick Employment Land Review Update (2013) identifies the site as providing 10ha of existing employment land within the District, but is not identified as a site which is available for future employment uses. Paragraph 5.16 explains that the "*is treated separately due to the restricted use for motorsports activities*", however it is important to clarify that the extant planning permission is for automotive and motorsport research together with ancillary office and low volume development production. Paragraph 9.5 of the ELR also states that the District and the sub-regional economy supports a concentration of higher value manufacturing activities and with strengths in the motor vehicle sector.

Whilst the site does have an extant planning permission for development, we believe that there could be greater growth over the plan period and beyond if more of the site was to be utilised.

The site is clearly an important part of the sub-regions plan for economic growth and has a number of investment initiatives to bring this forward as demonstrated by the inclusion of it in the Economic

Plan for Coventry and Warwickshire and City Deal funding secured. The site can contribute significantly to the District employment levels by providing high skilled local jobs.

EC1 – Directing New Employment Development

We object to the policy, with specific reference to the test on rural areas and permitting new development within major sites identified in the policies maps in accordance with Policy MS2 (Major Sites in the Green Belt). As set out under our comments on Policy DS8 above, the Honiley Airfield site has significant potential (on an existing site) to provide further advanced facilities to further strengthen the District's role in this sector. A barrier to this growth would be the limited boundary of the proposed MDS. The site is a key priority for the CWLEP and is investing a significant amount of capital into supporting the site's usage and growth. Given the importance and investment, the barrier of the MDS will not provide any certainty for any future investment over and above the existing planning permission, over the plan period. This goes against the Council's own objective's and the objectives of the Strategic Economic Plan.

Growth of the advanced manufacturing and engineering sector is not just a sub-regional aspiration; it is also the government's aspiration as set out in HM Treasury's and DfBIS 'Plan for Growth' report (2011). Throughout the report the key message is growth of the economy through greater private-sector investment. Private sector investment in sectors such as automotive sports/advanced manufacturing will not be encouraged to come forward with plans for development if there are counter-active barriers.

Policy MS2 –Major Sites in the Green Belt

The current boundary for the site was adopted upon the recommendation of the Inspector in his Report on the then Draft Local Plan in 2006, where the adopted boundary was amended due to concerns in respect of the impact of development on the openness of the Green Belt. The Inspector concluded at paragraph 10.4.18 "... I consider that while the boundaries of the southerly section of the MDS shown in the Revised Deposit Plan are appropriate, the northerly section should be reduced in size to exclude the pine plantation and the open grassed area. I recommend accordingly". The adopted MDS was further reduced in size and excluded the wooded area to the west of the existing buildings by the Council.

Plan 25 of the Draft Local Plan amends this MDS boundary to include the woodland area to the north of the site, bringing it in line with the extant planning permission. This is welcomed and supported, and was also one of our suggested changes in previous representations.

Paragraphs 3.149 to 3.154 set out the justification for the amendment in the boundary together with some background information to the site. At paragraph 3.151 the Council have acknowledged that the site has an important role in delivering the aims of the Coventry and Warwickshire Local Enterprise Partnership (CWLEP), in relation to the growth of advanced manufacturing, particularly in the long term through the implementation of the planning permission. Its importance is again set out at paragraph 3.152 by the Council. The policy as drafted clearly sets out that the range of uses on the site will be restricted to the automotive and motorsport industries and associated employment.

Paragraph 3.153 of the Draft Plan sets out that some small scale development will be necessary adjacent to the test track to assist in operations, but that the Council will ensure that the openness of the Green Belt is maintained.

The concept of openness needs to be re-examined within the context of the extant planning permission, in the process of being implemented, the existing buildings and use of the site and the future provision of high quality automotive related facilities. The consented Catalyst Building is the focal point for the site; it is a prominent building which will provide facilities in line with the use of the test track. The openness we believe simply refers to the test track and its flat surface but the track itself is made of hard standing materials and provides a facility which is used through the

provision of the buildings. The site needs to be considered as a whole as the test track and the building work together. There is existing screening on the number of the boundaries as a whole. The test track would be seen against the backdrop of the new buildings bought forward and would not perform a Green Belt function.

We request that the Council as a minimum re-examine the boundary of the MDS to include the test track as part of the overall site, conscious of the extensive areas of hardstanding associated with it, its previously developed character, and recognising that fact that it has an established pattern of continued use for vehicle testing and driver training which is consistent with the principle use of the wider site. The site is Previously Developed Land (PDL), with the principle of significantly increasing the employment floorspace agreed by the extant planning permission. With the financial investment the CWLEP are making on site, it would become an underutilized economic asset.

It would be more appropriate, however, to go further than this and seek to remove the entire site out of the Green Belt to ensure that the site's future use is secured and that future development of employment generating uses are not prejudiced through the Green Belt or MDS allocation. Paragraphs 83 to 85 of the NPPF sets out when Council should review the Green Belt designation and amend boundaries. It is clear that local authorities '*should not keep land which it is unnecessary to keep permanently open*' within the Green Belt and that the concept of a sustainable pattern of development has been agreed by the granting of the extant planning permission. We have submitted together with these written representations a proposed boundary of the site (plan reference 21124-RG-L04) for allocation as a MDS, although in our view the Council could remove the whole site from the Green Belt (see below).

Policy DS19 – Green Belt

The Green Belt boundary has been revised as part of this new emerging Local Plan, to enable development that is required, to come forward in a measured way and in accordance with the NPPF (Draft Local Plan paragraph 2.80). A number of sites/land has been removed from the Green Belt which includes land in the vicinity of Coventry Airport (sub-regional employment site) and the University of Warwick.

We are disappointed however that our site, which has been identified as an important investment site continues to remain largely within the Green Belt, and on this basis object to the Policy. We note that the site was not assessed within the Green Belt Review and the Council have used the 2006 Local Plan Inspector's Report to inform the current designations on the site. We have undertaken a Green Belt review and do not consider that the site as a whole, together with the planning permission which will be implemented this year, makes a significant contribution to the Green Belt.

As set out above the site benefits from two planning permissions; as a vehicle testing facility (currently being used) and for the development of the Fulcrum development (all reserved matters and pre-commencement conditions to be submitted shortly). The principle of development on the site has already been established, and the importance of the test track to the future use of the site has been demonstrated by the CWLEP. Together with the level of investment in infrastructure to attract more users to the site, and the economic plan requiring the growth of this sector and site, the Green Belt designation could prejudice this.

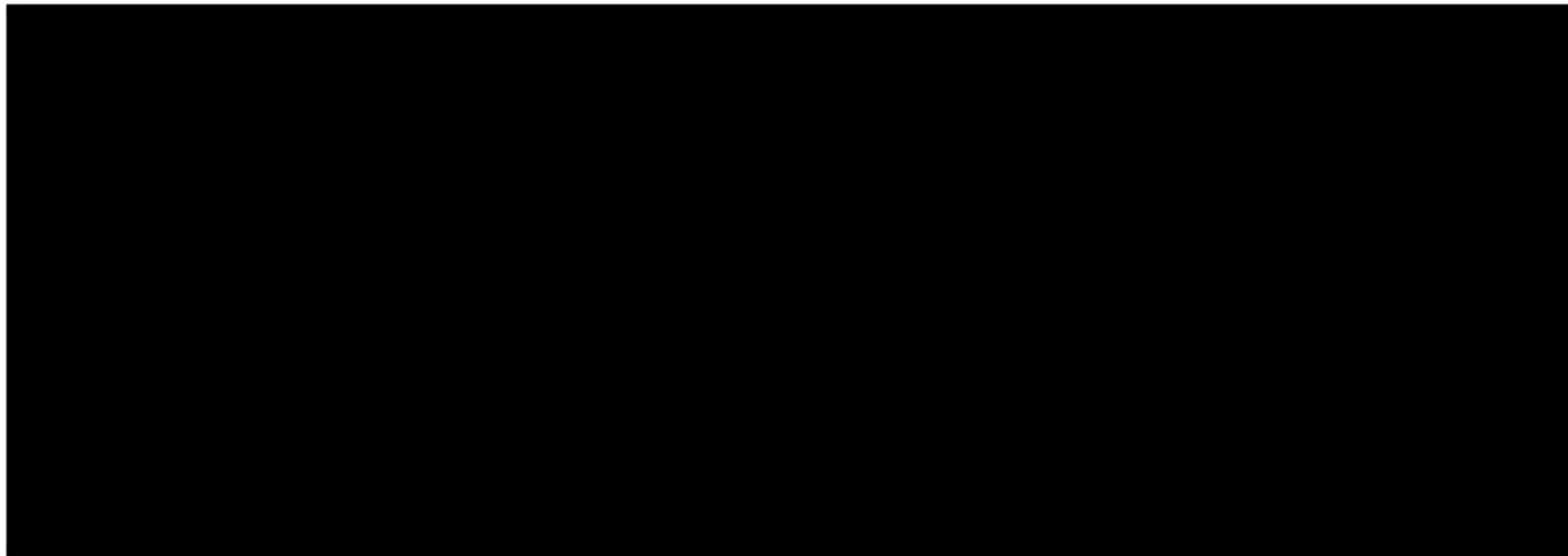
The site is clearly an important part of the District's and sub-regional growth plan, and the Council's opinion that the openness of the site needs to be maintained should be considered in the longer term context of the benefits of economic development and the future use and growth of the site. Whilst extending the MDS would be welcomed, this would still act as a constraint on the site.

It is our suggested change that the entire site taken out of the Green Belt to ensure that the site can be 'future proofed' for future economic development, in line with the Council own visions and objectives and Paragraph 20 of the NPPF ("to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an

economy fit for the 21st century"). We have provided a site boundary plan showing our suggested change (plan reference 21124-RG-L04).

We trust the above comments will be taken into account when progressing the New Local Plan, and we would be pleased to meet with you to discuss our comments further. In the meantime, if you have any queries or wish to discuss any of the above in greater detail, please do not hesitate to contact Mark Sitch or myself.

Yours sincerely,



RENU PRASHAR PRINJHA
Senior Planner

Enc. As above