

## REPRESENTATIONS MADE TO WARWICK DISTRICT PRE-SUBMISSION DRAFT LOCAL PLAN CONSULTATION

Local Plan Proposed Policy:

### Policy DS16 Sub-Regional Employment Site

Land in the vicinity of Coventry Airport (totalling 235 hectares) as shown on the Policies Map, will be allocated as a major employment site (for B1, B2 and B8 uses) of sub-regional significance.

The Council will require that a Masterplan or Development Brief is prepared which will ensure that the site is developed in a comprehensive manner.

We support the Local Plan's allocation of the land in the vicinity of Coventry Airport as a major employment site of sub-regional significance, to serve the regeneration needs of the Coventry and Warwickshire sub-region.

The Council has considered and resolved to approve a planning application for the site (Coventry and Warwickshire Gateway), which broadly comprises land for employment, for green space, for highway and other infrastructure, together with ancillary uses which are deemed to be important for the commercial success of the overall development. We understand the Council's requirement to set the Gateway scheme, properly justified, in its sub-regional and local context. Particularly, we recognise the need to demonstrate the sufficiently very special circumstances to take the land out of the Green Belt.

Importantly, the Policies Map identifying the allocated site corresponds to the Gateway application plan with regard to the scale and location of development and the 111ha to be retained as Green Belt which will benefit from extensive landscaping and new public access.

Therefore, we are pleased that the Pre-Submission Draft Local Plan recognises the significance and importance of the Gateway site alongside its potential and we support the Council's assertion that the Gateway application demonstrates how a development scheme of the site could be achieved and that it does demonstrate 'very special circumstances'.

### The Site

The site, adjoining the urban area of Coventry, is an ideal location for employment led development with the potential for excellent transport links and the opportunity for investment in the local infrastructure to benefit the wider area. Part of the site is 'contaminated land' which renders it inappropriate for other forms of development and the Gateway proposal for the site includes remediation methods which will address this issue.

Its context, alongside the successful Stonebridge and Middlemarch Business Parks, to an extent reinforces the strength of the allocated area as a sustainable location for employment development. Consequently, the site could be considered an extension of a major, developed business location which also includes the airport.

### What the Gateway Scheme at the Allocation will Deliver

The Gateway scheme will accommodate up to 10,000 jobs in a mixture of office, manufacturing and logistics space, funded by the private sector with a £250 million investment.

Gateway will provide a mix of employment generating buildings to accommodate all types of space, from small 'grow-on' units suitable for those innovative enterprises concentrated in high technologies, to large stand alone manufacturing and distribution units serving the wider sub region. The proposed Gateway scheme is a comprehensive development of the site for a range of employment generating uses, which will comprise five main elements:

- the creation of a technology hub with up to 83,594 sqm of mixed employment and ancillary uses focused primarily on automotive, aerospace and digital technologies;
- the construction of a logistics park with up to 343,740 sqm of B2/B8 floorspace;
- significant on and off site highway works;
- the demolition and relocation of airport buildings to enable the construction of a new internal access road; and
- the establishment of an extensive area of open space and strategic landscaping, incorporating public access and biodiversity enhancement.

The Policies Map identifies the area to be retained as Green Belt and this is the portion of the Gateway application which is designated as a Country Park with landscaping; habitat creation; biodiversity areas; and extensive public access. Currently there is no public access.

Importantly, up to an additional 4,000 jobs could now be more readily provided at the Whitley Business Park as a direct result of the Gateway strategic highway works.

The comprehensive approach to delivery of Gateway will be phased, with the development area divided into two employment zones; Zone A – Manufacturing and Distribution and Zone B – Advanced Manufacturing/Technology Park.

It is anticipated that up to 6,000 jobs will be generated in Zone A with a further 4,000 in Zone B. This information is based on the HCA employment densities guide 2010, together with empirical evidence provided by developers of other sites (see Appendix 1).

### Context for the Allocation

Since March 2011 Government has set *“clear expectations that local planning authorities and other bodies involved in granting development consents should prioritise growth and jobs”*. The National Planning Policy Framework (NPPF) formally introduced the concept of a presumption in favour of sustainable development, to which there are three dimensions: an economic role; a social role; and an environmental role. These roles are mutually dependent but the NPPF makes it clear that sustainable development includes *“making it easier for jobs*

*to be created in cities, towns and villages”* and requires local planning authorities to ‘proactively’ drive and support sustainable economic development.

The Government has also stated that local planning authorities should respond positively to the wider opportunities for housing, business and other development needs of their areas. Importantly, Government stresses that “.....*Authorities should work together to ensure that needs and opportunities that extend beyond (or cannot be met within) their own boundaries are identified and accommodated in a sustainable way, such as housing market requirements that cover a number of areas, and the strategic infrastructure necessary to support growth”*.

In this collective regard, it is accepted that the congestion which regularly occurs at the A45/A46 (at the confluence of Coventry City, Warwick District and Rugby Borough local authorities) represents a major failing of the *strategic infrastructure* south of Coventry, which impacts adversely on the economic vitality of the whole sub-region.

Coventry City Council has published its “Jobs Strategy for Coventry” to cover the period 2011 – 2014 against the background of rising unemployment and increasing joblessness and this is relevant because there is now a well-established relationship between employment availability in Coventry City and residence in Warwick District; the two local authority areas are very closely linked economically.

The Coventry area has a high level of employment deprivation in relation to the rest of England with a clear socio-economic need for additional local employment opportunities. Coventry and its hinterland has long been known as a centre for engineering excellence, yet over the last decade the economic health of the region has deteriorated. However, this appears to be changing with an increase in business activity in the sub-region, from some major national and international companies, including Aston Martin, Costco, H&M, Network Rail, LG and UK Mail. In this context the Gateway scheme could deliver the vital boost that the region’s economy needs in order to continue to grow and prosper. Therefore, in allocating the site in Policy DS16 as a Sub-Regional Employment Site the Warwick District Council is laying the foundations for job creation which will benefit the wider sub-region. The allocation also actively involves Warwick District Council in cross boundary cooperation with Coventry City Council, as required in national policy through the ‘Duty to Cooperate’.

Equally, taking the Government’s economic objectives as its lead, the Coventry and Warwickshire Local Enterprise Partnership [the LEP] has set a strategy for economic and employment growth. As part of its strategy the LEP has selected the Gateway scheme as the best and most appropriate location to stimulate and foster economic and job growth. The Managing Director of the Coventry and Warwickshire LEP has stated that:

*“The Gateway is a scheme of major strategic importance for Coventry and Warwickshire.*

*It represents a long-term opportunity to create high value jobs, attract inward investment and make major improvements to the infrastructure of the area. It is a once-in-a-generation opportunity.”*

Moreover, in the Strategic Economic Plan published by the LEP in March 2014 the Gateway scheme is listed as the “*priority employment site for delivery*” within the ‘top 5’ priority sites. The Gateway scheme is described as a site benefiting from a:

*“central strategic location which capitalises and unlocks current and planned investment and supports economic and social priorities across the CWLEP area.”*

And furthermore

*“provides the largest available employment site at 121ha and without development (of the site) the CWLEP will be unable to meet its expected overall employment growth.”*

The LEP’s identification of the importance of the site with regard to enabling Warwick District and the wider area to achieve its growth potential, particularly in the priority areas of logistics, advanced manufacturing and engineering, highlights the genuine importance of the site to the sub-region; therefore, it is an entirely appropriate for the Council to allocate the site as a Sub-regional employment site.

### Green Belt and ‘Very Special Circumstances’

Significantly, the allocation of the site for employment removes it from the Green Belt and we support the Council in this regard. Removal of land from the Green Belt requires very special circumstances which outweigh the ‘harm’ to the Green Belt. The two questions which should be answered as part of this assessment are:

- i) What is the extent of harm to the Green Belt?
- ii) What are the benefits of the proposal and do these benefits outweigh the harm?

#### i) The Extent of Harm

In terms of harm by way of inappropriateness, part of the judgement is dependent on the level of harm to the Green Belt in terms of its essential characteristics and purpose; the value of the Green Belt.

In 2009 a Joint Green Belt Review was undertaken on behalf of Warwick, Coventry, Nuneaton and Bedworth and Rugby Councils, by SSR planning. The Green Belt review assessed land around the Coventry urban area assessing parcels of land in terms of their contribution to the purposes of including land within the Green Belt and then assessed the various parcels against a range of environmental and physical constraints which might preclude future development. The report concluded that the majority of the Gateway site has a *“low landscape value”*.

#### ii) Do the benefits outweigh the harm?

The allocation of the land in the vicinity of Coventry Airport for development responds positively and appropriately to national planning policy. Fundamentally, it will help to address the economic and growth requirements of the sub-region, making it easier for jobs to be created, in line with Paragraph 9 of the NPPF. It also seeks to address the issue of contaminated land at the site which will have obvious environmental benefits. Paragraph 109 of the NPPF states that the planning system *“should contribute to and enhance the natural and local environment”* by, amongst other things, *“remediating and mitigating contaminated and unstable land”*.

Therefore, the potential benefits that the allocation could bring to the area in terms of job creation is a significant factor which must also be weighed against the recognition in the Joint Green Belt Review that the majority of the site lies within an area of the Green Belt considered as having a low landscape value.

In this context, the allocation of the land for development conforms to national policy as the potential benefits offered by the Gateway scheme are significant and demonstrably outweigh the 'harm' to the Green Belt. Indeed, the remediation measures which form part of the proposals, for the area within the site which is contaminated land, will provide environmental benefits and, importantly, the allocation is caveated with the requirement for high quality landscaping and open space provision.

### Conclusion

The allocation of the site in the vicinity of Coventry Airport responds positively to national policy. As per the NPPF the allocation accords with the presumption in favour of sustainable development, which is described as the “*golden thread*” which should run through “*both plan-making and decision-taking*”. It positively addresses the three dimensions: in a social role the allocation with the Gateway scheme will promote a strong, vibrant and healthy community; in an economic role development of the site will provide significant investment in the region with significant job creation; in an environmental role, the development could substantially and positively enhance the natural and built environment.

Unequivocally, the central location of the Gateway development site provides the opportunity to unlock investment and to capitalise on this. In the context of the sub-region employment issues, the job numbers that the Gateway scheme could provide are too important to be ignored and the Council is therefore correct in allocating the land in the vicinity of Coventry Airport as a strategic employment site which could benefit both Warwick District and the wider sub-regional area.

So, the Coventry and Warwickshire Development Partnership supports the proposed allocation. Although, because ancillary uses, such as hotel and minor retail are important for the success of large employment areas, a modification to the wording of Policy DS16 is suggested as follows:

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The Council will require that a Masterplan or Development Brief is prepared which will ensure that the site is developed in a comprehensive manner.

The allocation will incorporate ancillary uses, such as hotel and minor retail which will be identified in location and scale in the Development Brief.

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## APPENDIX 1

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## **GATEWAY JOB CREATION**

### **Zone A: Manufacturing and Distribution Park**

It is anticipated that this will generate up to 6000 jobs (FTE) – this is based on the HCA employment densities guide, 2010 and, more recent empirical evidence provided by developers of other sites.

Development in Zone A will be up to 343,740 sqm of B2/B8 floorspace, of which the B2 floorspace will be up to 104,000 sqm.

The HCA guidance provides employment densities for B2 development at 36m<sup>2</sup> per FTE. Using this figure the B2 floorspace would accommodate approximately 2,900 FTEs. The B8 floorspace (239,740sqm) would accommodate approximately 3,196 FTEs using the HCA guidance of approximately 75m<sup>2</sup> per FTE.

### **Zone B: Advanced Manufacturing / Technology Park**

It is anticipated that this development will generate up to 4000 jobs (FTE) – this is also based on the HCA employment densities guide.

Development in Zone B will be up to 83,594 sqm of mixed B1 buildings intended primarily for Automotive, Aerospace and Digital Technologies; Hotel[s], Use Class C1; Retail Unit[s], Use Class A1, A3, A4 and A5; and car showroom[s] comprising:

- Up to 65,032 sqm of B1 primarily B1b/B1c space
- Up to 4,645 sqm of car showroom space
- Up to 2,300 sqm of ancillary A1, A3, A4 and A5 floorspace
- Up to 11,617 sqm of C1 floorspace

The B1 floorspace is approximately 20m<sup>2</sup> per FTE. By comparison the HCA guidance for a business park would be 10m<sup>2</sup>. So, the conclusion we would draw would be that these figures are conservative.