



Stoneleigh & Ashow Joint Parish Council

Clerk: Mrs P. A. Maddison

Development Policy Manager
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5HZ

25th July 2013

Dear Sirs

WDC PLANNING	
Ref	
Officer	
26 JUL 2013	
SCANNED	
CC	CR PR MA
PRE	GEN DIS

Revised Development Strategy 2013

The proposed Development Strategy demonstrates in our view that Warwick District Council's emerging plan is unsound.

Section 3.5 of the Revised Development Strategy (May 2013) summarises sustainable development principles including "avoiding coalescence". But WDC's proposals fail to achieve this principle. The so-called Sub-Regional Employment Site would cause coalescence of Coventry and Baginton and the proposed Thickethorn developments would erode significantly the separation between Kenilworth and Leamington. The proposals are not sustainable.

The Employment Land Review identified a need for 36ha of employment land for the period 2011 – 2030 and there already exists 48ha of available employment land, therefore there is in fact an **excess of employment land already available in Warwick District.**

The issue of the amount of employment land is mainly caused by WDC's approach to the assessment of Employment Land Requirements. This approach turns a substantiated excess of employment land into a claimed deficit of employment land, resulting in the proposed policy RDS6 which specifies that 22.5 hectares of new employment land should be allocated between 2011 and 2029, mostly in the Green Belt.

Table 4 shows the detail behind the claimed deficit; this is reproduced below.

The supply demand balance	Hectares
Demand	
Net employment land requirement 2011 - 30	36
Margin to provide flexibility of supply	16.5
Potential replacement for redevelopment of existing employment areas	13.5

Total gross employment requirement (demand)	66
Supply	
Completed employment land since 2011	0.47
Current available land supply	48
Total gross employment land supply	48.5
Balance to be allocated	17.5 (15 to 25)

Section 4.5.8 then takes the bottom line figure of 17.5ha and increases this figure to 22.5ha in order "to allow for flexibility and the assumptions used in modelling and forecasting". This further 'buffer' of an additional 5ha increases the 'Margin to provide flexibility of supply' of 16.5ha to 21.5ha. This represents a **60% contingency**. Error in modelling/forecasting can go either way (plus or minus), not just one direction. The claim that "it is reasonable to provide an additional 22.5 hectares of employment land" is entirely unreasonable.

The established requirement is 36ha; against this, 16.5ha 'Margin to provide flexibility of supply' is itself excessive: 46% extra on top of the established demand of 36ha in order to provide 'choice'; increasing this to 60% above the established demand seems to be an **unjustified excessive amount of flexibility**. The environment cannot afford such generous flexibility.

The final component in the demand side of the table above is 'Potential redevelopment of existing employment areas', amounting to 13.5ha. This is a generation of demand, more employment land is claimed to be needed because of the **unjustified change of use of existing employment land**, removing it all from the employment portfolio and allocating it to housing. Sections 4.5.19-4.5.20 (and 4.2.4) describe the proposal to remove 19.5ha of existing employment land for housing and replace it with 13.5ha of new employment land.

The proposal to take all of this land out of the employment portfolio conflicts with other sections of the consultation document. Section 4.3.9 makes quite clear that **some** of the 'tired' employment land **could** be released for housing development. No justification is provided for taking **all** of the land out of employment use; there seems to be no reason why such employment land should not be redeveloped for continuing employment purposes (if demand is really there). It is extreme to assume that all of this land will be 'lost' to employment uses. It is not acceptable to take brownfield land in urban areas out of the employment portfolio and replace it with greenfield land outside urban areas, much in the Green Belt. The strategy should be to improve effective use of the 19.5ha for continuing employment use at an increased density of employment.

Established numbers in the above table show the base demand as 36ha and the base supply as 48ha. The unadjusted numbers show an **excess of employment land of 12ha**. This excess provides ample flexibility and margin for error.

An alternative Table 4 shows the other view of demand and supply; this is produced below.

The supply demand balance	Hectares
Demand	
Net employment land requirement 2011 - 30	36
Margin to provide flexibility of supply	16.5

Total gross employment requirement (demand)	52.5
Supply	
Completed employment land since 2011	0.47
Current available land supply	48
Potential redevelopment with increased density of existing employment areas	6
Total gross employment land supply	54.47
Balance to be allocated	0

Even with this scenario there is no need to develop either further open countryside or Green Belt.

Through double counting, unreasonable buffers and unjustified changes of use, WDC has transformed an excess of employment land into a **misleading claimed deficit** of 22.5ha. This cannot be justified. The misleading claimed deficit is then used to try to justify development of new employment land in the open countryside and in Green Belt (section 4.6):

- Thickthorn (8ha) between Kenilworth and the A46 and; [Green Belt]
- Part of the Gateway site (6.5ha) around Baginton and Coventry Airport; [Green Belt]
- And Southern sites (south of Warwick and Whitnash) (8ha) [Greenfield]

By protecting existing employment land and by making more reasonable assessments of buffers and flexibility, **there is ample employment land available without development in the Green Belt.**

The Revised Development Strategy goes on to allocate a “Sub-Regional Employment Site” (Policy RDS8). Section 5.5 is based on an extant planning application, presenting claims from the planning application as though they were sufficient justification for the District’s development strategy.

The first issue with Section 5.5 is evident in its title: the meaning of ‘sub-regional’ is not defined. The Regional Spatial Strategy has been abolished but the justification in section 5.5 still relies on its policies such as the Coventry & Warwickshire Regeneration Zone. This is directly in conflict with Government policy on the abolition of the RSS and makes the proposed strategy unsound. The long-established economic partnership in the area is CSW – Coventry, Solihull and Warwickshire – but the Revised Development Strategy focuses on the Coventry & Warwickshire City Deal and the CWLEP. In practice, the ‘sub-region’ is an artificial construct with no proven need.

While Section 5.5 purports to be describing a generic employment site for predominantly B1, B2 and B8 uses, it depends on the justification for the specific uses proposed in the Coventry Gateway application even though this focuses on the Gateway’s proposed B1(b) (research and development) sub-class, for example. Policy RDS8 as described when the consultation document was written (before the planning committee considered the Coventry Gateway application in June 2013) is little more than pre-determination of the Coventry Gateway application.

Even if a ‘sub-regional’ need were justified, no justification is provided for siting it entirely in Warwick District and in the Green Belt. Considering that any ‘sub-region’ contains at least Coventry, North Warwickshire, Nuneaton & Bedworth, Rugby, Stratford upon Avon and Warwick, what is the justification for locating the ‘sub-regional employment site’ within Warwick District? The Gateway proposal is acknowledged to be inappropriate development in the Green Belt and relies upon demonstrating ‘very special circumstances’ where we maintain there are none.

Justification for the proposed development relies almost entirely on the Regional Spatial Strategy for the West Midlands, and even following the abolition of the RSS, WDC continues to rely upon the RSS, and the never adopted RSS Phase2, in order to justify the Gateway proposal.

The development would have a detrimental effect on many existing employment sites throughout the region that remain largely undeveloped. These provide perfectly adequate alternatives and the Gateway would undermine their redevelopment. This would be contrary to NPPF policies on urban regeneration and brownfield first.

The proposed development comprises sections of B8 distribution in one part, and B1 together with A1 retail, A3 restaurants, hotel and car showrooms in another. These elements could and should be accommodated elsewhere if disaggregated, there is no benefit in locating them together, as confirmed by the GL Hearn report.

There is no identified demand for the types of development outlined, and it cannot be demonstrated to be a development of the right type. There are many alternative locations where development of the types outlined could be accommodated, and which would have much less harmful impacts. Numerous alternative sites exist which consist of previously developed land and no justification is given as to why this particular site, in this particular location, is so special as to be considered the right place. Also given that there are many previously developed and allocated sites in the wider region that remain undeveloped, and would be competing with Gateway for occupiers, this cannot be considered to be the right time, as defined in the NPPF.

The views of the surrounding communities consistently expressed by the local Parish Councils have been almost completely ignored. The impact on local communities will be very significant, with the rural village of Baginton and their Conservation Area consumed by its coalescence with the City of Coventry. The character and setting of other adjoining villages of Bubbenhall and Stoneleigh, also with Conservation Area status, will be irrevocably damaged and contrary to the NPPF.

No consideration of alternative sites, in environmental terms, has been given, where alternative sites would cause much less significant harm to the environment. Instead, the application relies entirely upon the experimental concept of 'biodiversity offsetting' to justify mitigation and compensation measures, which are offered up as a benefit rather than a 'last resort', and also contrary to the NPPF.

The employment claims have been robustly challenged and in December 2012 the LPA commissioned an independent report from GL Hearn. However, the brief to GL Hearn included "regard should be had to the Regional Spatial Strategy (RSS) and in particular to the RSS Phase II revision (and Panel Report) including the identification in this document of the need for a further Regional Investment Site to serve the Coventry Nuneaton Regeneration Zone." The report is therefore fundamentally flawed and cannot be relied upon following the abolition of the RSS. It should also be noted that Phase II of the RSS was never adopted in the first place.

It was estimated by GL Hearn that 8,210 jobs will be created by this development around the airport of which 6,370 jobs are new jobs. Of the total, it is estimated that 1,230 jobs will be taken by people living in Warwick District, 4,940 to people from Coventry and 2,040 to people from elsewhere.

Warwick District has a low unemployment claimant count of 1,499 people in May 2013. By contrast, Coventry has a claimant count of 9,432, North Warwickshire 850, Rugby 1417, Nuneaton and Bedworth 2890 and Stratford only 821. Therefore, of the total unemployed claimant count of

16,909 in Coventry and Warwickshire, only 1,499 people are from Warwick district and 821 from Stratford. This Gateway site is clearly remote from the main areas of unemployment.

In considering employment need and in cooperation with neighbouring Local Planning Authorities WDC and those neighbouring LPA's should seek to direct employment land allocation where it is most needed. Recently Daw Mill Colliery near Arley in Warwickshire has suffered a catastrophic underground fire which occurred in February and has taken until early June to put out. It is estimated that it will cost £100million to bring the mine back to a condition for mining to restart. Since February, the shortfall of coal has been made up from coal imports, which are considerably less expensive than the cost of extracting coal from Daw Mill. These events have led to a decision that the mine is no longer viable and has been permanently shut down.

Alternative sites such as Birch Coppice and Daw Mill are located north of Coventry with Nuneaton and Bedworth only a few miles away. They are in the same location as the areas with high unemployment and closure of Daw Mill has only added further to that unemployment. As we are all aware, job losses in this difficult economic climate have a very negative impact on the surrounding community.

Both have their own railhead which would give distribution companies a direct rail link to all the ports for importing and exporting goods to the Midlands and are relatively close to the M6, M42 and the M6 Toll motorways. The sites have a long established industrial use as coal mines; remediation and regeneration would provide an ideal opportunity to create employment where employment is needed. Regeneration of these sites would facilitate jobs, solve economic problems and reverse the environmental CO2 emissions due to the cessation of coal production.

Given that the Coventry & Warwickshire LEP scheme will be dependent on very large cash inputs from Government, we consider that it would be a better use of Growing Places funding to properly replace the mines with the distribution and storage element that is proposed for the Coventry Airport site. It would provide jobs for people where the unemployment is located.

We have repeatedly requested that the financial viability and deliverability of the Gateway scheme should be scrutinised and tested and we question if it is the best use of financial and land resources. The current Gateway proposal is located in Warwick District, where the unemployment numbers are very small and requires the loss of over 300ha of Green Belt. The NPPF requirement for 'very special circumstances' to allow this development on Green Belt land in Warwick District do not exist.

Turning to Zone B we consider many alternative sites already exist that have already benefitted from public funds such as nearby Ansty Park. If there were a genuine need for the offices, research & development facilities, based on demand from Coventry University high tech research and development, there are alternatives which are not in the Green Belt.

Since this development is being funded mainly by LEP grants from Government it would seem to be a better use of public finances to broaden its effect as much as possible by solving the employment problem, at least in part, where it is most needed at the same as providing new facilities for the Government's growth agenda.

Policy RDS8 would either take jobs from areas with greater need (unemployment is considerably higher in Coventry and Rugby, for example) or add further to the excess of employment land in Warwick District. The proposed site location undermines the well-established principle of urban regeneration, fails to recognise the brownfield-first policy (e.g. NPPF section 111) and would be inappropriate development in the Green Belt. Locating a major employment site in a rural area

would increase the need to travel, particularly by car. The proposed criteria claimed to justify such a development in the Green Belt depend on policies of the abolished RSS (e.g. Coventry & Nuneaton Regeneration Zone) and vague concepts such as 'sub-regional need'.

The Core Planning Principles in the NPPF require planning to *"take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them"*. Policy RDS8 fails to meet this requirement. **The proposed policy RDS8 is not justified, it would damage the environment and it should be removed.**

This excessive allocation of employment land and the inclusion of the sub-regional employment site all add further strain on the provision of housing within the District. This creates further problems and makes the Development Strategy unsustainable and undeliverable.

Yours sincerely

Stoneleigh and Ashow Parish Council

