

Our Ref: P876/SH/ec
Date: 16th June 2014

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BY EMAIL & POST: newlocalplan@warwickdc.gov.uk

Dear Sir / Madam

**Warwick District Local Plan 2011-2029 Publication Draft
Representations on behalf of LaSalle Investment Management
Stoneleigh Park**

Thank you for providing Harris Lamb Planning Consultancy (HLPC) with the opportunity to participate in the preparation of the Warwick District Local Plan. HLPC are instructed to submit representations to the Publication draft consultation document by LaSalle Investment Management (LIM). LIM controls Stoneleigh Park, one of Warwick District's key employment sites. As such they are a key stakeholder in the preparation of the emerging plan.

I can confirm that representations were submitted to the Preferred Options Consultation Local Plan by HLPC in respect of Stoneleigh Park. These representations suggested a series of amendments to the draft Local Plan, including the inclusion of a new policy to guide development at Stoneleigh Park during the course of the plan period. My client is disappointed that this approach has not been adopted by the Local Authority in the Publication draft consultation document.

These representations have been prepared in order to identify the changes that we believe are necessary to the draft Local Plan in order for it to be made sound, in context of paragraph 182 of the National Planning Policy Framework (the Framework). This includes a series of alterations to the Plan's Green Belt policy and the inclusion of a new policy in relation to Stoneleigh Park.

Attached to this letter is a complete set of Representation Forms providing a response to the specific policies of the publication draft Consultation Local Plan as appropriate. In order to put these representations into context, this letter provides further details of LIM's involvement in Stoneleigh Park to date and it outlines the wider planning policy context of the site.

LIM and Stoneleigh Park

Stoneleigh Park is a unique facility within the Green Belt in terms of its scale (101 hectares) and the range of activities taking place there. It became the permanent home of the Royal Agricultural Society of England (RASE) in 1963. The role of RASE is defined by its Royal Charter and in fulfilling this role Stoneleigh Park acts as a headquarters for a number of agricultural and countryside organisations as well as hosting many shows and conferences. There are in excess of 70 businesses on site employing 1,100 people and this is expected to increase by 1,500 over the next 15 years to 2,600 employees.

LIM have agreed a 150 year lease at Stoneleigh Park with the RASE. Under this agreement the management and development of Stoneleigh Park is the responsibility of LIM while RASE concentrates on its role as the champion of rural and agricultural advancement. As part of a long term plan to secure the future of Stoneleigh Park there is a shared vision between RASE and LIM to develop the site as a rural innovation science park with an emphasis on sustainability, the environment, agricultural, equine activity and forestry as well as rural businesses and research activities. It is LIM's intention to work with the Council, local residents and other interested stakeholders to help revitalise the deliver sustained development at Stoneleigh Park.

LIM agreed the lease on the site on the basis that Stoneleigh Park should evolve into a national hub for rural and sustainable research alongside an equine centre of excellence and innovation science park. The Park should attract businesses interacting with the agricultural and equine sectors and those involved in the sustainability and knowledge based industries. Showground events will continue to provide unique opportunities to showcase knowledge and trade. Farming, education and higher education providers will ensure that new methods are exchanged and debated through the existing events, hotel and conference facilities.

In order to assist in delivering this objective, Warwick District Council has granted planning permission for a major mixed use development on the site (application reference W/12/0766). The Local Authority is currently in receipt of a series of applications to discharge with various pre-commencement conditions in order to allow the initial phase of development to commence on site.

Since the grant of planning permission the route of HS2 has been safeguarded, which passes directly through Stoneleigh Park. This does have significant implications for a future development at Stoneleigh Park. However, LIM remain committed to working with the Local Authority in order to deliver the new development to assist in delivering Stoneleigh Park as a high quality rural science and innovation Park. It is, however, imperative that the Local Plan properly identifies and responds to the impact of HS2 on Stoneleigh Park and puts in place a policy to guide the development of Stoneleigh Park should HS2 receive Royal Assent.

Warwick District Local Plan 1996-2011

The Warwick District Local Plan was adopted on 21st September 2007 and, unlike the emerging plan, includes a specific policy to guide the development of Stoneleigh Park. Local Plan Policy SSP2 – Major Developed Sites in the Green Belt, identifies a series of Major Development Sites in the Green Belt that are in suitable locations for appropriate limited infill and redevelopment for employment or other uses identified in the plan. This policy identifies Stoneleigh Park as a Major Developed Site in the Green Belt and directs the reader to Policy SSP3. Policy SSP3 – Stoneleigh Park, states that:

'Development will only be permitted at Stoneleigh Park where it consists of uses related to the promotion of agricultural and associated activities, equestrianism and the wellbeing of the countryside and its inhabitants'.

The Local Plan Inspectors Report confirms why it was necessary to include a policy in the plan in relation to Stoneleigh Park. Paragraph 10.5.4: it is advised that:

"In the emerging Local Plan, prepared in the context of the 1995 version of PPG2, Stoneleigh Park has been recognised as a MDS. Because of its size and the unique circumstances of the Royal Charter under which it operates, a bespoke policy SSP3 was also included."

Since this conclusion was reached there has been no material change in circumstances to warrant a different conclusion being reached. Stoneleigh Park is of the same size and the Royal Charter under which it operates remains in place. HS2 now passes through the site which adds an extra layer of complexity to the future development of the site. In addition a major outline planning permission for the site has been approved. That being the case, the only change in circumstances since it was last concluded that it was appropriate to include a policy guiding the development of Stoneleigh Park in the adopted Local Plan has been the addition of a further layer of planning policy that reinforce the need for a specific policy to guide the future development of Stoneleigh Park.

The Framework

The Framework was published in March 2012 and sets out the Government's Planning Policies for England and how they should be applied. The "Plan Making" section of the Framework advises that:

'crucially, local plans shouldallocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate'.

The accompanying National Planning Practice Guidance (NPPG) goes on to advise that sufficient details should be given in Local Plans to provide clarity to developers, local communities, other interests parties on the nature and scale of development (addressing the what, where, when and how questions) (Reference ID: 12-011-20140306).

Given the rural and strategic nature of Stoneleigh Park, the Framework and the NPPG suggest that policies should be included in order to address the above requirements. It is noted that the emerging plan refers to Stoneleigh Park as a "key employment site in the district" (Paragraph 3.8), providing 5 hectares (in excess of 10%) of the Authority's available Employment Land (Paragraph 3.41). This further reinforces the need for a specific policy to guide the future development of the park.

Planning Permission W/12/0766

On 21st November 2012 Warwick District Council granted Planning Permission W/12/0766 that granted planning permission for the following (ref W/12/0766):

'Outline Planning Application for the development / redevelopment and use of buildings at Stoneleigh Park to provide a science, business, technology and innovation Park (use class B1a and B1b), equine facilities, livestock and agricultural facilities, education and

learning (use class D1), research (use class B1b), sustainability and energy, exhibitions, show grounds, hotel and conference facilities (use class C1/D1), animal husbandry, animal hospital, visitor centre, camping facilities, together with other ancillary uses and activities including retail, leisure and catering, and associated roads, footpaths, cycle routes, junction improvements, parking, servicing and landscaping (including off site Highways infrastructure) which support the function of the park and demolition of some buildings and infrastructure.

Condition 2 of the planning permission requires applications to be made to the Local Authority no later than the expiration of 8 years from the grant of planning permission (November 2020). That being the case, the planning permission time expires 9 years before the end of the plan period. The outline planning permission provides a framework for the determination of reserved matters applications for the next 6 years and confirms a range of uses that are appropriate at Stoneleigh Park. However, following the expiry of this application, a new outline planning permission will be required in order to put a similar planning framework into place. As things stand there is no policy in the emerging Plan to provide any context against which to determine a new planning application. Given the scale and nature of Stoneleigh Park this is considered to be inappropriate.

HS2

Since outline planning permission W/12/0766 was granted the route of HS2 has been safeguarded. The extent of the safeguarded land is shown on Local Plan Policies Map 9 Draft Policy TR5 – Safeguarding the Transport Infrastructure, confirms that the local authority will safeguard the route of HS2 and development will not be permitted where it could inhibit the effective delivery of HS2. Insert Map 9 clearly demonstrates the significant impact the safeguarding zone has on Stoneleigh Park. A major proportion of the north east corner of Stoneleigh Park is safeguarded for the development of HS2 which will have a significant material effect on the ability to effectively fully implement the approved masterplan planning permission. Issues will also be created across the site on the compatibility of a high speed rail line with the proposed bespoke equine activities. If HS2 receives Royal Assent it is inevitable that there will need to be considerable re-masterplanning at Stoneleigh Park in order to accommodate HS2 and to deliver new growth and development at Stoneleigh to protect existing jobs and to create new jobs.

As drafted the emerging plan provides no guidance on the way in which HS2 in Stoneleigh Park interact and how this will affect the long term future of the site. This is inappropriate and further reinforces the need for a specific policy to guide the development of Stoneleigh Park.

The attached representations have been prepared in the context of the above background information. We would welcome the opportunity to work with the Council in order to see if any areas of agreement can be reached prior to the examination. We would welcome the opportunity to meet with the Council to discuss this matter further, given the scope of our objections.

Yours faithfully



Simon Hawley BA (Hons) MA MRTPI

Director

simon.hawley@harrislamb.com

DIRECT DIAL: 0121 213 6015

CC: *Colin Hooper, LaSalle*

Publication Draft Representation Form 2014

For Official Only	
Person ID	
Rep ID	

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Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title		Mr
First Name		Simon
Last Name		Hawley
Job Title (where relevant)		Director
Organisation (where relevant)		Harris Lamb
Address Line 1	Correspondence care of Agent	Grosvenor House
Address Line 2		75-76 Francis Road
Address Line 3		Edgbaston
Address Line 4		Birmingham
Postcode		B16 8SP
Telephone		0121 455 9455

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Please specify whether you wish to be notified of any of the following:

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- Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Yes No
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Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Local Plan

Paragraph

Policies Map Number:

DS4 – Spatial Strategy

5. Do you consider the Local Plan is:

5.1 Legally Compliant?

Yes

No

5.2 Complies with the Duty to Co-operate?

Yes

No

5.3 Sound?

Yes

No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Policy DS4 cannot be considered sound due to the requirements of subsections A, C and G of the policy.

Parts A and C of policy DS4 provides guidance on the approach the Local Authority will take to the distribution of housing and employment development during the course of the plan period. Parts A & C of the policy advise that new employment development will, in the first instance, be directed to previously developed land in the urban area and where greenfield sites are required for employment they should be allocated in accessible locations in close proximity to existing or proposed housing.

As a general approach these criteria do reflect national policy. However, it does not address the unique circumstances in Warwick District where there are a number of significant previously developed sites in the Green Belt, including Stoneleigh Park, that are major employers.

As stated in the accompanying letter, Stoneleigh Park is a 101 hectare rural employment site that has previously been identified as a Major Developed Site in the Green Belt. There are over 1,100 people employed on the site and this is expected to increase by 1,500 jobs over the course of the next 15 years. Stoneleigh Park has the benefit of outline planning permission that will allow for approximately a 22% increase in the amount of floor space on site during the coming years.

The publication draft plan advises at paragraph 3.157 that the Council continues to support the unique role of the park and the significant economic benefits that will arise as a consequence of its redevelopment. Paragraph 3.158 confirms that it is accepted that there may need to be a review of a master plan to properly guide development on the site during the plan period.

There is, therefore, a clear recognition that Stoneleigh Park is a suitable location for new economic development. However, as drafted policy DS4 would seek to redirect any new economic development away from Stoneleigh Park. In order to add clarity to this policy, additional text should be included within the explanation to advise that the approach outlined in the policy is not directly applicable to the previously developed site in the Green Belt. Guidance on the development of previously developed sites in the Green Belt is provided elsewhere in the plan including a specific policy on Stoneleigh Park.

Turning to subsection G, which provides guidance on development in the Green Belt, the approach outlined does not accord with national planning policy. Subsection G of the policy advises that development in the Green Belt be limited to locations where "exceptional circumstances" can be justified. This approach departs significantly from the guidance set out in the Framework.

The "exceptional circumstances" test is a requirement of paragraph 83 on the Framework. The exceptional circumstances test only applies in the plan making process when local authorities are in the process of altering Green Belts. It is, therefore, inappropriate for part G of the policy to make reference to "exceptional circumstances" in this context.

In order to be in conformity with the Framework, part G of the policy should advise that the Local Planning Authority will consider the construction of new buildings in the Green Belt as inappropriate with the following exceptions:

- Buildings for Agricultural and Forestry
- Provision of appropriate facilities for outdoor sport, outdoor recreation and cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes including land within it;
- The extension or alteration of a building providing that it does not result in disproportionate additions over and above the size of the original building
- Replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.
- Limited infilling in villages, and limited affordable housing for local community needs in accordance with wider policies in the Local Plan; or
- Limited infilling or the partial or complete redevelopment of previously developed sites (Brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have greater impact on the openness of the Green Belt and the purposes of including the land within it than the existing development. The previously developed sites in the Green Belt include those identified by Local Plan Policy LS2 – Major Site in the Green Belt.
- In all other circumstances it will be necessary for an applicant to demonstrate “very special circumstances” for development in the Green Belt to be considered acceptable.

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is suggested that the following amendments are required to the policy:

- Specific guidance should be included within the explanatory text to explain that the approach to the distribution of development outlined in Parts A – F of the policy are not directly applicable to the redevelopment of previously developed sites in the Green Belt.
- Part G of the policy, that relates to Green Belt development, should be amended to be in conformity with the Framework as identified in box 7 above.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues** he/she identifies for examination.

For Official Use Only

Person ID:

Rep ID:

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to reserve the right to attend the examination.

As drafted policy DS4 could adversely affect the development of Stoneleigh Park, one of Warwick District's largest employment sites. Given the significant potential implications of Policy DS4 on Stoneleigh Park, it is necessary to attend the examination in order to provide the Inspector with a full understanding of the policy's implications.

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Date:

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1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

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First Name		Simon
Last Name		Hawley
Job Title (where relevant)		Director
Organisation (where relevant)		Harris Lamb
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Local Plan or SA:

Local Plan

Paragraph

Policies Map Number:

EC1 – Directing New Employment Development

5. Do you consider the Local Plan is:

5.1 Legally Compliant?

Yes No

5.2 Complies with the Duty to Co-operate?

Yes No

5.3 Sound?

Yes No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The recognition in Part C of the policy that new employment development is appropriate within the 'Major Sites' in the Green Belt identified by Policy MS2 is supported. However, as per HLPC omission site representations we are of a view that an additional policy needs to be added to the Plan to guide development at Stoneleigh Park. If this policy is included amendments will be required to Policy EC1 to cross refer to the proposed policy.

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

HLPC are of a view that an additional policy should be included in the plan to guide the development of Stoneleigh Park. The new policy should be cross referred to in Policy EC1 for completeness.

Continue on a separate sheet if necessary

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If the Inspector is of the view that the site it is appropriate to include a policy to guide the development at Stoneleigh Park within the plan, the consequential amendment to Policy EC1 could be addressed by way of either a minor or major amendment.

Continue on a separate

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Part B - Your Representations

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4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Local Plan

Paragraph

Policies Map Number:

CT1 – Directing New Tourism, Leisure and Cultural Development

5. Do you consider the Local Plan is:

5.1 Legally Compliant?

Yes No

5.2 Complies with the Duty to Co-operate?

Yes No

5.3 Sound?

Yes No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Policy CT1 confirms that new tourism and leisure development will be permitted in town centres. In all other cases new tourism and leisure development will only be permitted where:

- a) It is demonstrated there are no sequentially preferable sites or buildings available for development;
- b) The facility is of type and scale that means it primarily serves the local community.

The approach of policy CT1 does not deflect the guidance set out in the framework on Rural, leisure and tourism development. Specifically, paragraph 28 of the Framework advises that to support a strong rural economy, Local Plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors and respect the character of the countryside. This should support the provision and expansion of tourist and visitor facilities at appropriate locations where identified needs are not met by existing facilities in rural service centres.

The above guidance is particularly relevant to Stoneleigh Park. Stoneleigh Park is a major tourist attraction. There are a significant number of events and shows held at the park each year. Indeed, paragraph 3.114 of the emerging plan confirms that Stoneleigh Park is one of the attractions in the district that contributes towards the 3.1m visitor trips each year with an associated spend of £220m and supports over 4,850 jobs.

As drafted, Policy CT1 would direct new improved tourism and leisure development away from Stoneleigh Park. This is inappropriate.

In summary, Policy CT1 does not comply with the guidance and framework on tourism development in rural areas. In addition, it does not reflect the significant role that Stoneleigh Park plays in the local tourism and leisure sector.

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy CT1 should be amended to include additional text to advise that the Local Authority will:

- Support sustainable rural tourism and leisure developments in accordance with the guidance at paragraph 28 of the Framework.
- The approach towards directing new tourism and leisure developments found in Policy CT1 is not directly applicable to new developments at Stoneleigh Park.
- Future development at Stoneleigh Park will be guided by the new policy in the plan which puts in place a framework for future development at Stoneleigh Park.

Continue on a separate sheet if necessary

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For Official Use Only

Person ID:

Rep ID:

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to reserve the right to attend the examination. Stoneleigh Park is a major tourism destination. As drafted Policy CT1 could hinder its sustained growth. Given the significant implications CT1 could have on the future of Stoneleigh Park it is necessary to attend the examination in order to fully prove the inspector on the harm that could arise as a consequence of the policy.

Continue on a separate

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11. Declaration

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Signed:

Date:

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Publication Draft Representation Form 2014

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Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title		Mr
First Name		Simon
Last Name		Hawley
Job Title (where relevant)		Director
Organisation (where relevant)		Harris Lamb
Address Line 1	Correspondence care of Agent	Grosvenor House
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3. Notification of subsequent stages of the Local Plan

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Part B - Your Representations

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4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Local Plan

Paragraph

Policies Map Number:

CT2 – Directing New or Extended Visitor Accommodation

5. Do you consider the Local Plan is:

5.1 Legally Compliant?

Yes No

5.2 Complies with the Duty to Co-operate?

Yes No

5.3 Sound?

Yes No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Policy CT2 advises that new or extended hotel or visitor accommodation is appropriate in the town centre. In the rural area new or extended visitor accommodation will only be provided where it is within a “growth village” or constitutes the conversion of a rural building. Extensions to existing visitor accommodation in rural areas will only be permitted where they do not significantly intensify the use of a site.

As a general rule we have no specific concerns regarding the approach of Policy CT2, however, it fails to take account of the unique circumstances affecting Stoneleigh Park. Stoneleigh Park is a significant employment site in the district and there are numerous shows and conferences taking place in the site throughout the year. It is, therefore, necessary for people to stay on the site overnight. Whilst there is an existing hotel on the site it has limited capacity and outline planning permission has been granted for a larger hotel on site. In addition, outline planning permission is in place for the development of new and extended camping facilities and discussions are ongoing with an operator for the camp site.

At the present time Stoneleigh Park’s outline planning permission does allow for new or extended visitor accommodation on site. However, once it expires, any planning application for new or extended visitor accommodation will be determined in the context of Policy CT2. The final part of the policy, which confirms that extensions to existing visitors accommodation in the rural area will be permitted, provided that they do not intensify the use of the site, is helpful. However, in order to add additional clarity to the policy further exploratory text should be added cross referring to the proposed new policy on Stoneleigh Park and the guidance it contains on visitor accommodation.

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy should cross reference a new policy on Stoneleigh Park that will help guide its future development.

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to reserve the right to attend the examination given the potential implications on Policy CT2 on the developments of Stoneleigh Park.

Continue on a separate

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11. Declaration

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Signed:

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1. Personal Details*

2. Agent's Details (if applicable)

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First Name		Simon
Last Name		Hawley
Job Title (where relevant)		Director
Organisation (where relevant)		Harris Lamb
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Address Line 3		Edgbaston
Address Line 4		Birmingham
Postcode		B16 8SP
Telephone		0121 455 9455

3. Notification of subsequent stages of the Local Plan

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- The submission of the Local Plan for independent examination Yes No
- Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Yes No
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Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Local Plan

Paragraph

Policies Map Number:

CT4 – Extensions to Tourism, Cultural or Leisure Facilities in Rural Areas

5. Do you consider the Local Plan is:

5.1 Legally Compliant?

Yes

No

5.2 Complies with the Duty to Co-operate?

Yes

No

5.3 Sound?

Yes

No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The general approach of Policy CT4 is supported. However, Part B of the policy needs to be amended.

Chapter 3, Supporting a Prosperous Rural Economy, of the Framework advises that the Local Authority should support sustainable rural tourism and leisure developments that benefit businesses in rural areas and respect the character of the countryside. Whilst Part B of Policy CT4 advises that development that generates significant movements should be located where the need to travel will be minimized and the use of sustainable transport modes maximized, this is not a requirement of the Framework. Furthermore, paragraph 32 of Framework confirms that developments should only be prevented or refused on transport grounds where the residual cumulative impact on the development are “severe”.

That being the case, Part B of policy should not seek to prevent rural tourism, cultural or leisure developments, simply because they generate significant volumes of additional traffic if that traffic can be mitigated against and does not result in “severe” residual cumulative impacts.

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Part B of the policy should be reworded to read “generate significant volumes of additional traffic where appropriate mitigation cannot be put in place; and”.

Continue on a separate sheet if necessary

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For Official Use Only

Person ID:

Rep ID:

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Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Continue on a separate

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4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Local Plan

Paragraph

Policies Map Number:

MS2 – Major Sites in the Greenbelt

5. Do you consider the Local Plan is:

5.1 Legally Compliant?

Yes No

5.2 Complies with the Duty to Co-operate?

Yes No

5.3 Sound?

Yes No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

We are generally supportive with the requirements of Policy MS2 and with recognition that limited infilling and the redevelopment of previously developed sites in the Green Belt is appropriate as set out in the Framework. However, the policy and its supporting text provides relatively limited guidance on the form and nature of development that the Local Authority will consider appropriate at Stoneleigh Park.

As referred to in the representation cover letter, the currently adopted Local Plan contains a specific policy (SSP3 - Stoneleigh Park) to guide the development of Stoneleigh Park. The Local Plan Inspector's report confirms this policy was required due to the significant scale of Stoneleigh Park, the fact it has a Royal Charter and its unique development position. These are all relevant factors today. As such we are of a view that an additional policy should be included within the plan to guide the future development of Stoneleigh Park. Consequently, Policy MS2 should be amended to cross refer to a new policy guiding the development of Stoneleigh Park.

Paragraph 3.158 recognises that it may be necessary to revisit the Masterplan planning application during the course of the plan period. This is correct. The outline planning permission for the site (W12/0766) does not allow the submission of reserved matters applications after November 2020, some 9 years before the end of the plan period. Therefore a new Masterplan application will be required towards the end of the plan period to guide the development of the site. However, the drafted Policy MS2 does not provide any guidance on the forms of development at Stoneleigh Park that the Local Authority will consider acceptable. That being the case, a new policy is required in this regard as referred to in our wider representations.

Whilst the policy should be amended to cross refer to a new policy on Stoneleigh Park, there are specific elements of policy MS2 and its supporting text that we are in support of.

We support the recognition that the redevelopment and limited infilling at Stoneleigh Park is appropriate.

Reference to the fact that there may be very special circumstances to support further development at Stoneleigh Park given its unique nature is also supported. In this regard, it is, however, noted that the "very special circumstances" test is linked to an approved Masterplan or a Development Brief by Part 3 of the policy. It is our view that this is not essential and whilst a Masterplan or a development brief is desirable the "very special circumstances" test can be dealt with on an application by application basis if required.

Turning to the policy's supporting text, recognition that the park hosts a wide range of shows and events and is an established part of the rural economy, both locally and nationally is helpful as is the recognition that the existing outline planning permission for the site is likely to bring significant economic benefits to the local area. The reference in the policy to the Council supporting the Park and the delivery of the Masterplan secure its long term future is also welcomed.

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Paragraph 3 of the policy should be amended. It should be confirmed that the "very special circumstances" text for development at Honiley Airfield, Stoneleigh Park and Stoneleigh Deer Park, will be considered in the light of any approved Masterplan or development brief for the site where appropriate. However, where there is not a Masterplan or development brief in place, or the proposed development falls outside the context of any Master Plan or development brief, the very special circumstances case will be considered on its own merits.

Additional text should be included within the policy to cross refer to a new policy guiding future development at Stoneleigh Park.

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Rep ID:

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The approach the Policy MS2 has significant implications for the future of Stoneleigh Park. As drafted this is the only policy on the plan that provides any guidance on how the Local Authority will treat future development at Stoneleigh Park. Given that Stoneleigh Park is one of the largest employment sites in the area, and as confirmed by the emerging Plan, it is of both local and national importance to the rural economy (paragraph 3.155) it is imperative that the plan provides for the future evolution of the Park to facilitate sustainable development. It is necessary for this matter to be discussed in front of the Inspector given the significant implications of the policy.

Continue on a separate

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11. Declaration

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All forms should be received by **4.45pm on Friday 27 June 2014**

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Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick
Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth
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Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title		Mr
First Name		Simon
Last Name		Hawley
Job Title (where relevant)		Director
Organisation (where relevant)		Harris Lamb
Address Line 1	Correspondence care of Agent	Grosvenor House
Address Line 2		75-76 Francis Road
Address Line 3		Edgbaston
Address Line 4		Birmingham
Postcode		B16 8SP
Telephone		0121 455 9455

3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

- The submission of the Local Plan for independent examination Yes No
- Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Yes No
- The adoption of the Local Plan. Yes No

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Local Plan

Paragraph

Policies Map Number:

Omission Policy – Stoneleigh Park

5. Do you consider the Local Plan is:

5.1 Legally Compliant?

Yes

No

5.2 Complies with the Duty to Co-operate?

Yes

No

5.3 Sound?

Yes

No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

At the present time there is no policy in the draft plan to guide future development at Stoneleigh Park. This approach is inappropriate as:

- Whilst there is currently an outline Masterplan planning permission in place for the development of the site (W/12/0766), the opportunity to submit reserved matters planning applications expires in November 2020. As referred to in Policy MM2 – Major Sites in the Green Belt, in the emerging Plan there may be a need to revisit the Masterplan application during the course of the plan period. This is inevitable as the plan period goes beyond the length of the Masterplan planning permission. However, there is no specific guidance in the emerging Plan to confirm the scale, type and nature of uses which are appropriate at Stoneleigh Park.
- The “plan making” section of the Framework provides guidance on policy formulation. Paragraph 157 of the Framework advises that “crucially, the local plan should.....allocate sites to promote development and the flexible use of land, bringing forward new land where necessary and providing detail on the form, scale, access and quantum of development where appropriate”.

It is necessary for a policy to be included in the plan guiding the form, scale, access and quantum of development that is appropriate at Stoneleigh Park in accordance with guidance in the Framework. It is one of the largest employment sites in Warwick District and will continue to evolve through the plan period. It is important to the rural economy both locally and nationally (Paragraph 3.155 of the draft Plan).

Since the grant of planning permission W/12/0766 the line of HS2 has been safeguarded. Local Plan Policies Map 9 – Stoneleigh, demonstrates the impact that the HS2 safeguarding corridor will have on Stoneleigh Park. A significant proportion of the north-east section of Stoneleigh Park is within the safeguarding area and this will have significant implications for the development of Stoneleigh Park. It will fundamentally affect the way in which the masterplan planning permission can be implemented. A high speed rail line will inevitably affect the equine and agricultural based uses that are currently at the park and the park seeks to attract. The character of the park will be changed and there will, in all likelihood be a need to significantly review the masterplan for the site in order to enable development to come forward.

- The previous version of the Local Plan includes specific policy to guide the development of Stoneleigh Park. The Local Plan Inspector’s Report confirms that a policy of this nature was required because of Stoneleigh Park’s size and the unique circumstances of the Royal Charter under which it operates. Both these factors remain relevant today. Indeed, extra layers of complexity has now been added to future development at Stoneleigh Park due to the safeguarding of the HS2.

It is, therefore, essential that the Plan includes a policy to properly guide development at the Park in the future to remove any uncertainty regarding the determination of planning applications. This policy should reflect the range of uses that the outline Masterplan planning permission for the Park puts in place. This range of uses has been tested by the Local Authority and has been found to be acceptable through the planning application process. There is, therefore, no logical reason why the Local Plan Policy should not adopt a similar approach.

It is also necessary for the policy to take account of the implication of HS2 receiving Royal Assent. The policy should allow for and provide guidance on the preparation of a new masterplan for the site taking into account HS2.

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is suggested that the following policy is included within the emerging Plan:

“Stoneleigh Park

Planning applications and proposals for new development at Stoneleigh Park that will enhance the Parks status as a rural business park will be supported. Development will be permitted at Stoneleigh Park which provides the following uses:

- ***Exhibitions, Showgrounds, Rural Business Innovation Park***
- ***Other Equine and Veterinary uses***
- ***Offices and research and development facilities***
- ***Livestock Facilities***
- ***Education and Learning***
- ***Research***
- ***Sustainability and Energy***
- ***Hotel & Conference Facilities***
- ***Visitor Centre***
- ***National Equine Centre***
- ***Camping Facilities***
- ***Ancillary Leisure, Retail and Catering***
- ***Other Uses, activities and infrastructure that would support the function of the Park***

The extent of the Stoneleigh Park previously developed sited boundary is defined on the Local Plan, Policy’s Map No. 9. The above range of uses will be considered appropriate in principle within the defined Stoneleigh Park boundary. The local authority will consider the impact any new development at Stoneleigh Park has on the openness of the Green Belt or the purposes of including land within it.”

The line of HS2 is safeguarded by the Warwick District Local Plan and the extent of the safeguarded land at Stoneleigh Park is identified on Local Plan Policies Map 9 – Stoneleigh. If HS2 receives Royal Assent Warwick District Council will work with Stoneleigh Park’s owners, tenants and the Royal Agricultural Society for England (RASE) to masterplan the site to take account of HS2. This will include reviewing the range of uses that are appropriate at Stoneleigh Park in the context of the impacts of HS2 and the aspects to protect and create new jobs at the Park. Support will be given to a new masterplan planning application for the site if this is considered appropriate.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

For Official Use Only

Person ID:

Rep ID:

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The inclusion of the policy to guide future development at Stoneleigh Park in the plan is essential. Without it there is a policy vacuum for future planning applications. This is inappropriate given that Stoneleigh Park is one of the largest and most significant employment sites in the district and is of local and national importance for the rural economy. The opportunity to attend the examination in order to explain to the Inspector the significant implications of the omission of the Stoneleigh Park policy is required.

Continue on a separate

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Date:

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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Publication Draft Representation Form 2014

For Official Only	
Person ID	
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This consultation stage is a formal process and represents the last opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) before it is submitted to the Secretary of State. All comments made at this stage of the process are required to follow certain guidelines as set out in the **Representation Form Guidance Notes** available separately. In particular the notes explain what is meant by legal compliance and the 'tests of soundness'.

This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

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Local Plan

Paragraph

Policies Map Number:

CCT – Planning for Renewable Energy & Low Carbon Generation

5. Do you consider the Local Plan is:

5.1 Legally Compliant?

Yes No

5.2 Complies with the Duty to Co-operate?

Yes No

5.3 Sound?

Yes No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

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Justified:

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We welcome the inclusion of a policy that provides guidance on the delivery of renewable energy development. Specifically, we support the reference in the policy to the Local Authority supporting the principle of renewable energy generation technologies.

Continue on a separate sheet if necessary

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