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Dear Sir/Madam

**WARWICK DISTRICT COUNCIL NEIGHBOURHOOD PLAN AREAS
BAGGINGTON, BUBBENHALL, STONELEIGH AND ASHOW NEIGHBOURHOOD PLAN
AREA CONSULTATION**

Thank you for providing Harris Lamb Planning Consultancy (HLPC) with the opportunity to provide comments on the proposed Baggington, Bubbenhall, Stoneleigh and Ashow Parish Neighbourhood Plan Boundary. HLPC are instructed to make representations to the consultation by La Salle Investment Management (LIM). LIM control Stoneleigh Park, one of Warwick District's key employment sites. The entirety of the Park is in the proposed Neighbourhood Plan area. As such any Neighbourhood Plan has the potential to have significant implications for the operation of the Park. It will introduce an unnecessary and undesirable layer of planning policy. It is, therefore, our view that Stoneleigh Park should be excluded from the Neighbourhood Plan area.

Background

Stoneleigh Park is a unique facility within the Green Belt in terms of its scale (c 100 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 the 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 the site employing over 1,100 people and this is expected to increase by 1,500 employees 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 to be 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 an innovation science park 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 and deliver sustainable development at Stoneleigh Park.

LIM agreed the lease at Stoneleigh Park 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 and Science Park. The Park should attract businesses 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 at the existing events, hotel and conference facilities.

In order to assist in delivering this objective, Warwick District Council have granted planning permission for a major mixed use development on the site (application reference: W/12/0766). Outline planning permission was granted in November 2012 for:

“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 B1(a) and B1 (b) equine facilities, livestock and agricultural facilities, education and learning (Use Class D1), research (Use Class B1b), sustainability and energy, exhibitions, showground, hotels 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 landscape (including off-site highways infrastructure) which support the functioning of the Park and demolition of some buildings and infrastructure”.

This planning permission allows for the quantum of floorspace on the site to be increased by approximately 28% from 96,347 sq. m. to 123,672 sq. m. There is the ability to submit reserved matters applications under this outline planning permission until November 2020. A series of applications have been submitted to the local authority to discharge the various pre-commencement conditions associated with this planning permission. Furthermore two reserved matters planning applications have been approved.

Since the grant of this outline planning permission the route of HS2 has been safeguarded, which passes directly through Stoneleigh Park. This does have significant implications for future development at Stoneleigh Park. However, LIM remain committed to working with the local authority in order to deliver new development to assist in realising Stoneleigh Park's role as a high quality rural science and innovation park. It has been agreed with the District Council that whilst the HS2 safeguarding does impact upon the indicative masterplan submitted with the outline planning permission, the outline planning permission is flexible enough to deliver the range of uses identified and the quantum of floorspace proposed at Stoneleigh Park, albeit in an alternative configuration.

Turning to the Development Plan, the adopted Warwick District Local Plan and the emerging Warwick Local Plan both include text that recognise the important role that Stoneleigh Park plays within not only the local, but also the regional economy. These plans include policy guidance to help Stoneleigh Park continue to develop given its important role in the economy. Indeed, Stoneleigh Park is identified as one of nine sites in Warwick District that is expected to help the Council to deliver 47.35 ha of employment land during the plan period.

In summary, Stoneleigh Park is a key employment site where new development is actively supported by the Council.

Removal of Stoneleigh Park from Neighbourhood Plan Area

It is LIM's view that Stoneleigh Park should be excluded from the emerging Baggington, Bubbenhall, Stoneleigh and Ashow Neighbourhood Plan area. It is our view that the inclusion of Stoneleigh Park within the Neighbourhood Plan area is unnecessary and has the potential to significantly hinder the delivery of development on the site. It is suggested that Stoneleigh Park could be excluded from the Neighbourhood Plan area on the following grounds.

1. Desirability of Plan Area

The National Planning Practice Guidance (NPPG) sets out a series of requirements for Neighbourhood Plans including the role the local authority should play in assessing Neighbourhood Plan areas. The NPPG advises at paragraph ID: 41-032-20140306 that local planning authorities are required to have regard to the "desirability" of designating the whole of the area of a Parish or Town Council as a Neighbourhood Plan area. The NPPG goes on to advise that local planning authorities should consider a range of factors when determining Neighbourhood boundary areas including:

- Whether the area forms all or part of a coherent site either for businesses or residents; and
- Whether the area is wholly or predominantly a "business area". In business areas there should be two referendums, one for residents and one for businesses operating in the area, if the Neighbourhood Plan progresses that far. If both referendums agree (i.e. either both say yes or both say no) the decision is binding on the local authority. If the two referendums return a different decision, it will then be for the local authority to decide whether they should bring the Plan or Order into legal force

In considering the "desirability" tests it is necessary to have regard to the requirements of the National Planning Policy Framework (the Framework). Stoneleigh Park is an employment site of strategic importance. The Framework advises that the Government is committed to securing economic growth in order to create jobs and prosperity building on the country's inherent strengths. The planning system should do "everything it can" to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Significant weight should be placed on the need to support economic growth through the planning system (paragraph 19). Investment in businesses should not be overly burdened by the combined requirements of planning policy expectations (paragraph 21).

The message in the Framework is clear. The planning system should actively encourage sustainable economic growth and not introduce policies to constrain sustainable employment developments.

The adopted Local Plan includes a specific policy to guide the development of Stoneleigh Park (policy SSP3 – Stoneleigh Park). Furthermore, the emerging Warwick Plan includes a new policy, MS2 – Major Sites in the Green Belt that provides guidance in the policy and its supporting text on how future development proposals will be treated at Stoneleigh Park. The exact policy wording is currently the subject of negotiation between HLPC and officers of Warwick District Council and it is expected that a Statement of Common Ground will be agreed prior to the Examination with updated wording. Furthermore, there is an outline planning permission in place that will guide the future development of Stoneleigh Park for the next several years. The policies in the adopted and emerging Local Plan and the outline planning application have all been the subject of public consultation. The policies and outline planning permission guiding the development at Stoneleigh Park have all been informed by the views of the public.

It is our view that it is not “desirable” to include Stoneleigh Park within the Neighbourhood Plan boundary as there is the potential to introduce a further layer of planning policy that is not necessary. There is already ample guidance in place in the form of adopted and emerging local plan policy and the outline planning application to guide development at Stoneleigh Park. Any Neighbourhood Plan has the potential to add an unnecessary layer of additional planning policy that has the potential for development at Stoneleigh Park being “overburdened by the combined requirements of the planning policy expectations”. The introduction of policies to guide the development of Stoneleigh Park in any Neighbourhood Plan is both unnecessary and undesirable.

Furthermore, in considering Neighbourhood Plan boundaries local authorities are required to consider whether part of an area forms all or part of a coherent site for businesses or residents and whether the area is wholly or predominantly a business area. There are distinct character areas within the proposed Neighbourhood Plan area. Whilst the villages are clearly residential in character, Stoneleigh Park and Coventry Airport are clearly large scale employment sites. Indeed, on plan at least, it would appear that the amount of employment land area within the proposed Neighbourhood Plan Area is significantly greater than the amount of residential area. In our view it would be more appropriate to exclude the large scale employment areas from the Neighbourhood Plan area given the significant scale, the strategic importance and different characters that these areas have to the residential elements of the proposed Neighbourhood Plan area.

2. The Justification for the Proposed Neighbourhood Plan Area

The NPPG requires applications for Neighbourhood Plan areas to be accompanied by a statement explaining why the proposed neighbourhood area is an appropriate area (paragraph ID: 41– 032– 20140306). Local planning authorities should take into account the Relevant Body’s statement explaining why the area applied for is considered to be appropriate (ID: 31–035 – 20140306). The Application for the Designation of a Neighbourhood Plan letter, of the joint Parish Councils (21st November 2014) advises that it is believed that the Neighbourhood Plan is appropriate as it “recognised the rural nature of the Parish and the needs of the villages and commercial parts of the Parishes, it is essential to balance demand of all parts so that the most appropriate development plan is produced for the whole of the Parishes”.

There is not, in our view, a proper explanation why it is necessary for Stoneleigh Park to be incorporated within the Neighbourhood Plan. The commercial interests and pressures that affect the Park are best understood by LIM. LIM are of the view that the current and emerging planning policy situation is appropriate to guide future development at the Park. The existing and emerging Local Plan policies have been developed following detailed discussions with officers and both the planning and economic departments of the Council. There is no need to add an additional layer of policy guidance or explanation in the Council’s statement as to why this would be appropriate. It is not clear what the Parish hopes to achieve by including Stoneleigh Park in the Neighbourhood Plan Area and how including the Park in the Neighbourhood Plan will actively support the Frameworks presumption in favour of sustainable development.

3. Duplication of Policies

Whilst the NPPG advises that Neighbourhood Plans can include sites that are allocated for development in a Local Plan, it is necessary for the parties producing the Neighbourhood Plans to discuss with the local planning authority the planning context and circumstances that may inform the local planning authority’s decision on the area it will designate. Furthermore, if the local planning authority is intending to, or has, allocated sites for development in the

Neighbourhood Plan area, the local planning authority should avoid duplicating planning processes that will apply to the Neighbourhood Plan area.

As referred to above, both the adopted emerging Warwick District Local Plan include policies to guide the development of Stoneleigh Park. Stoneleigh Park is recognised as a key employment site by both documents and it is actively expected to contribute towards not only Warwick District's economy but also the sub-regional economy. This clearly suggests that it is inappropriate for Stoneleigh Park to be included in the Neighbourhood Plan since to do so would clearly result in "duplicating planning processes that will apply to the neighbourhood area".

It is also noted that the NPPG advises at paragraph 41 – 043 -2010306 that Neighbourhood Plans should not be used to constrain the delivery of strategic sites allocated for development in the Local Plan. Any policies within the Neighbourhood Plan guiding the development of Stoneleigh Park can, therefore, have a limited influence on future development within the Park's boundaries as they can constrain development beyond what is already proposed or approved by the outline planning permission. There is, therefore, little point in Stoneleigh Park being in the Neighbourhood Plan.

4. Business Area

It is also questionable whether the proposed Neighbourhood Plan area would constitute a "business area". In order to be considered a "business area" the Plan area in accordance with the definition in the NPPG should be wholly or predominantly used for businesses. Whilst the proposed Neighbourhood Plan area includes a number of villages, there are significant employment sites within the Plan boundary including Stoneleigh Park and the Coventry Airport site. In our view there is a case to be made that the area should be treated as a predominantly business area given the balance of employment to residential land uses. As a consequence, the non-domestic rate payers within the Plan area should also have the opportunity to vote in any referendum on the Neighbourhood Plan's ultimate adoption if the large commercial areas are included within the finalised Plan area.

We trust you have found these representations useful. If you have any comments, or would like to discuss this matter further, please do not hesitate to contact me.

Yours sincerely



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