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Grosvenor House  
75-76 Francis Road  
Edgbaston  
Birmingham B16 8SP

Development Policy Manager  
Development Services  
Warwick District Council  
Riverside House  
Milverton Hill  
Leamington Spa  
CV32 5QH  
**By post and email: [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)**

T 0121 455 9455  
F 0121 455 6595

Dear Sir/Madam

**Warwick District Local Plan  
Consultation on Proposed Modifications (2016)  
Representations in respect of Stoneleigh Park**

Harris Lamb Planning Consultancy (HLPC) are instructed by LaSalle Investment Management (LIM) to submit representations to the Warwick District Local Plan Proposed Modifications Consultation. HLPC have submitted representations on behalf of LIM to the previous consultation version of the Plan in respect of Stoneleigh Park. In addition, meetings have been held with Council officers regarding the approach of the emerging Local Plan towards controlling development at Stoneleigh Park. In short, we are of the view that insufficient information is included within the Plan to guide the future development of this nationally important strategic employment site.

Through the plan making process a number of amendments have been agreed with officers to the emerging plan in respect of Stoneleigh Park. It has not, however, been possible to agree the full extent of the proposed amendments with officers to date. It has previously been suggested by Council officers that it would be appropriate to prepare a Statement of Common Ground in respect of Stoneleigh Park to assist the Inspector with the examination of the Plan. LIM welcome this opportunity to work with Council officers in the preparation of a Statement of Common Ground in due course. However, given that it has not been possible to agree a full set of revisions to the Plan to take account of LIM's concerns, it is necessary to submit objections to the emerging plan Main Modifications in order to set out the amendments that we believe are required to the Plan in order for it to be made sound.

**Stoneleigh Park Site Specific Policy**

The first reason we object to the Plan is that unlike the adopted Local Plan it does not include a site specific policy to guide development at Stoneleigh Park. Stoneleigh Park is a nationally significant employment site and it is imperative a site specific policy is included to ensure its important economic function is supported.

The adopted Warwick District Local Plan contains a specific policy to guide the development of Stoneleigh Park, Policy SSP3 – Stoneleigh Park. This policy advises that:

***“Development will only be permitted at Stoneleigh Park where it consists of the uses relating to the promotion of agricultural and associated activities, equestrianism and the well-being of the countryside and its inhabitants”.***

The Local Plan Inspector’s report in relation to the adopted plan confirmed why it was necessary to include the policy in the Plan. At paragraph 10.5.4 of the Inspector’s report 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 that suggest it is no longer appropriate to have a policy in the Local Plan guiding the development of Stoneleigh Park. Stoneleigh Park’s size is unchanged 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 of development of the site. In addition, a major outline planning permission on the site has been approved (reference W/12/0766). That being the case, the only change in circumstances since it was last concluded that it was appropriate to include the policy guiding the development of Stoneleigh Park in an adopted Local Plan has been the addition of the further layer of planning policy that reinforces the need for a policy to guide the development of Stoneleigh Park.

A meeting was held between Simon Hawley of HLPC and Clare O’Connor of WDC on Monday 8<sup>th</sup> December 2014 in order to discuss the approach of the emerging plan towards Stoneleigh Park including the lack of a specific policy to guide future development of the site. At this meeting it was advised that officers were of the view that it was inappropriate to include a specific policy in relation to Stoneleigh Park given that the Framework removes the concept of Major Developed Sites in the Green Belt from national planning policy. Instead, the Framework includes reference to appropriate forms of development at previously developed sites within the Green Belt. Officers were concerned that this was not sufficient to warrant a specific Major Developed Site policy in the Framework to guide the development of Stoneleigh Park.

There is now additional clarity on this point as a consequence of the South Worcestershire Development Plan that was adopted in February 2016. The adopted SWDP includes Policy SWDP2 – Development Strategy and Settlement Hierarchy, which identifies four Major Developed Sites in the Green Belt within its policy text. Indeed, during the course of the examination process HLPC agreed with officers that it would be appropriate for an additional MDS to be identified within the policy. This matter was agreed through a Statement of Common Ground and the approach of identifying MDS was endorsed by the Inspector. Warwick District Council should not, therefore, be concerned that including a specific Major Developed Site policy within the Plan should cause any issues with the examination process.

Furthermore, it should be noted that the Framework advises in the “plan making” section that:

***“Crucially, Local Plans should..... allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide details on form, scale, access and quantum of the development where appropriate”.***

The accompanying National Planning Practice Guide (PPG) goes on to advise that sufficient detail should be given in local plans to provide clarity to developers, local communities, other interested

parties on the nature and scale of the development (addressing the What, Where, When and How questions) (reference ID: 12-011-20140306).

Given the strategic nature of Stoneleigh Park, and the implications of HS2, in accordance with the Framework and the PPG we consider that a policy should be included in order to guide development of the Park. It is noted that the emerging plan refers to Stoneleigh Park as a “key employment site in the district”. This further enforces the need for a specific policy to guide future development of the Park.

HS2 has significant implications for Stoneleigh Park. Emerging 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 shows the route of HS2 through Stoneleigh Park and clearly demonstrates the significant impacts the safeguarding zone will have on the Park. A significant proportion of the north east corner of Stoneleigh Park is safeguarded for the development of HS2 which will have significant impacts on the way in which Stoneleigh Park will need to develop in the future. Not only will Stoneleigh Park need to redistribute buildings and facilities throughout the site to accommodate HS2, it will impact upon the type of uses that are appropriate within certain sections of the Park. Noise sensitive uses will have to be carefully positioned so that they are not located adjacent to the HS2 line. In addition, the capacity of Stoneleigh Park to accommodate further development in the future is impacted on by a reduction in the net developable area.

### **Policy MS2 – Major Sites in the Green Belt**

In the absence of a site specific Stoneleigh Park policy, draft Local Plan policy MS2 – Major Sites in the Green Belt, is the principle policy in the emerging Plan that would guide the development of Stoneleigh Park. In essence this policy advises that:

- Development at the existing “Major Sites” in the Green Belt will be restricted to limited infilling and the development of previously developed land.
- In the case of the former Hollyfield Airfield, Stoneleigh Park, and Stoneleigh Deer Park, there may be very special circumstances to justify development within the boundary of the sites identified by the Policies Map.
- Where very special circumstances can be demonstrated proposals should be brought forward in line with approved masterplans or development beliefs which demonstrates that the openness and the purposes of including land in the Green Belt is retained.

It is appreciated that the accompanying text makes a number of useful references to Stoneleigh Park. These comments are welcomed, however, as drafted Policy MS2 puts in place controls over development to Stoneleigh Park that are more onerous than the requirements of the Framework or the existing Local Plan.

The Framework advises at paragraph 89 that the development at previously developed sites in the Green Belt is an appropriate form of development provided that the development constitutes infilling or the partial or complete redevelopment of previously developed sites and that it does not have a greater impact on the openness and purpose of the Green Belt than the existing development. In this regard the first part of Policy MS2 directly reflects the guidance within the Framework and does not expand on it in any way.

- Policy MS2 goes on to advise that there may be “very special circumstances” to justify further development of Stoneleigh Park beyond infilling and redevelopment. However, MS2 then

puts in place a further requirement for very special circumstances to be demonstrated in accordance with an approved masterplan or development brief for the site. This approach is inappropriate and inconsistent with the objectives of the Framework. The Framework allows for very special circumstances to be demonstrated on a site by site basis. It is not necessary for a masterplan or development brief to be put in place for very special circumstances to be tested against. The policy should make it clear that each planning application will be considered on its merits in the context of national and local level planning policy and very special circumstances will be tested on a case by case basis.

Whilst there is currently an outline masterplan planning permission in place for Stoneleigh Park (reference W/12/0766) the ability to submit reserved matters applications under this permission expires in 2020. There will, therefore, be no masterplan planning permission in place for the end of the plan period and the policy guidance contained in the Local Plan provides an extremely limited view of what development will be permitted at Stoneleigh Park. It is our view that the policy should be included in the Plan that advises that Stoneleigh Park is a suitable location for the development of the following uses:

- Exhibitions
- Showground
- Rural business innovation park
- National equine centre
- Equine and veterinary uses
- Livestock facilities
- Education and learning
- Research and development
- Sustainability and energy
- Hotel and conference facilities
- Visitors Centre
- Camping facilities
- Ancillary leisure, retail and catering
- Other uses, activities and infrastructure that would support the function of the Park

In this regard it should be noted that the above range of uses reflects the range of uses permitted by planning permission W/12/0766. The principle of the above range of uses is, therefore, already established.

LIM welcomes the opportunity to continue to work with the planning policy team through the Local Plan preparation process to ensure that the Local Plan includes proper guidance to influence the development of Stoneleigh Park in the future. We would welcome the opportunity to discuss this matter with officers in due course.

Yours sincerely



**Simon Hawley BA (Hons) MA MRTPI**  
**Director**  
[simon.hawley@harrislamb.com](mailto:simon.hawley@harrislamb.com)  
DIRECT DIAL: 0121 213 6015