

29 July 2013
Delivered by email

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

Dear Sirs

WARWICK LOCAL PLAN: REVISED DEVELOPMENT STRATEGY

On behalf of our client Mapeley Gamma Acquisition Co (4) Limited (acting by its Joint LPA Receivers Fergus Jack & Bryn Williams) we are instructed to submit representations to the Warwick Local Plan, Revised Development Strategy consultation. As owners of land and property within Warwick District, Mapeley has an interest in the future development strategy. Specifically, our client is seeking to ensure that Local Plan policy contains sufficient flexibility to facilitate the release of employment land, which no longer serves its function and might better accommodate residential development to meet the districts' housing land requirements.

Mapeley support the greater focus placed on the redevelopment of brownfield land to meet the identified housing target. In this respect, it is noted that the Employment Land Review 2013 has identified poor quality employment sites which may be suitable for housing development.

The Employment Land Review 2013 acknowledges that there has been a lack of speculative development activity in the district for over 12 years (from well before the start of the 2008 recession). If take up of employment land continues at a similar rate as it has over the last 5 years (circa 16 hectares take up in total) the existing supply of available employment land (48.5 hectares) has capacity to provide approximately 15 years' worth of supply.

Despite the long term dearth of speculative development activity and the healthy supply of available employment land (in comparison with past take up rates), a total of 22.5 ha of additional employment land is proposed to be allocated. We think that this is a generous provision, being 5 ha more than is required on top of the 17.5 ha identified by the Employment Land Review. In addition, the Coventry and Warwickshire Gateway Scheme is likely to reduce the requirement for employment land provision in Warwick District by an estimated 6.5 hectares.

Given the generous allocation of employment land it is considered that the Local Plan needs to set out a clear policy framework in regard to existing employment sites. Indeed the 2012 Preferred Options Consultation noted that the position with regard to any proposals on longstanding sites would be reviewed. The current saved Local Plan Policy (SC2) which restricts redevelopment or change of use of existing employment land, unless certain criteria are met, places too great a focus on viability, ignores demand and supply issues and is overly restrictive. We therefore consider that the new Local Plan should provide

greater flexibility to facilitate the release of employment sites (over and above those areas currently identified) which during the plan period no longer continue to meet business needs. Given the healthy supply and proposed provision of employment land this would not restrict the ability of new occupiers to find space.

The NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. To create the flexibility suggested, we recommend implementing a policy setting out the criteria / policy tests which must be met to release existing employment land. Introducing the test recommendations contained in the Employment Land Review 2013 would achieve this.

The NPPF also advises that employment land allocations should be reviewed regularly. In order to take account of future trends in take-up and availability of employment floorspace, it is considered that the Local Plan should include proposals for a regular review of employment allocations, and if necessary implement revised demanded forecasts for employment floorspace.

Mapeley is grateful for the opportunity to comment on the Revised Development Strategy and trusts that the representations will be taken into consideration as part of the continued preparation of the Local Plan.

Yours faithfully



Turley Associates