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

**BY POST & EMAIL**

21124/A3/JP/sw

29<sup>th</sup> July 2013

Dear Mr Barber,

**WARWICK DISTRICT LOCAL PLAN – REVISED DEVELOPMENT STRATEGY (JUNE 2013)**

We write on behalf of our client, One Hundred Percent Properties as owners of the former Honiley Airfield, Oldwich Lane, Wroxall. One Hundred Percent Properties welcomes the opportunity to make representations on the emerging Local Plan, conscious that the former Honiley Airfield has significant potential to contribute towards meeting the emerging needs of the District over the plan period.

**Background**

You will be aware that our Client's land is identified as a Major Developed Site (MDS) within the Green Belt which currently benefits from two planning permissions. The first is for a vehicle testing facility (Ref: W/2002/0762) that also permits vehicle demonstrations and driver training, dating back to 2002. The second is an extant planning permission (Ref: W06/0309), known as "The Fulcrum" for B1(b) use on the site to support a specialist automotive Research and Development facility which is the most recent consent, and was subject to an extension of time application (Ref: W10/0893) in 2011. The expiry date for the permission is 30<sup>th</sup> November 2014.

We have reviewed the Revised Development Strategy and would make the following comments.

**Section 3 - Strategic Vision**

We broadly support the aspirations that the District Council sets out for Warwick District to 2029 and consider that the land within our Client's ownership can play a significant role in assisting the Council in meeting their broad aims in relation to economic growth, meeting housing needs, and contributing to a more sustainable District in the future.

**Section 4.5 – Employment Land Requirements**

We support the identification of a need for new employment land over the plan period and the acknowledgement at paragraph 4.5.3 that the Plan needs to be consistent with the objectives of the NPPF which seek to place significant weight on the need to support and encourage sustainable economic development as a driver of growth.

Further, we welcome the recognition in paragraph 4.5.11 that the sub-region has a particular strength in the automotive / vehicle manufacturing and advanced manufacturing and engineering sectors and you will be aware that the former Honiley Airfield plays a key role in delivering facilities for these uses within Warwick District.

In this respect, we consider that it is key to the ongoing support and encouragement of growth in these sectors that the Council follow through on their proposal in the previous version the New Local Plan, at Policy POB, to develop *"a policy framework to support appropriate development at identified Major Developed Sites in the Green Belt which may include site specific policies for Stoneleigh Park, the University of Warwick, Coventry Airport and the Former Honiley Airfield"*.

We believe that a site specific policy for the former Honiley Airfield would support sub-regional objectives relating to economic development, in line with the Coventry and Warwickshire LEP Strategy 5 Year plan (2011-2016). This identifies local level, knowledge-driven industries as a priority and seeks to create an environment where it is easy for businesses to start, locate and thrive. It targets certain sectors, including advanced engineering, high value manufacturing and the automotive industries. This is reinforced in Paragraph 8.39-40 of the previous version of the New Local Plan which states that *"...the growth of these sectors must be set in the wider context of delivering a broad based, flexible and diverse economy to ensure that a wide range of employment opportunities are provided"*.

In addition to the clear economic benefits that could be delivered from future development at the site, attracting new investment would also result in a number of on-site environmental improvements, including re-laying the test track with a noise reducing surface and providing noise-attenuating bunds. This would ensure future development is sympathetic to the Green Belt designation and reduce the harm to the amenity of surrounding residents.

We therefore consider that a site specific policy would not only enable desirable automotive industries to occupy the Former Honiley Airfield Site and assist the Council with its wider strategic objectives. Our Client's business needs are also pressing and we would therefore be pleased to meet with you to discuss the wording of a site specific policy in more detail.

Further, and whilst we support the Council's intention to continue to identify the former Honiley Airfield as an MDS, we consider that the development of a site specific policy should be accompanied by a review of the MDS designation. As a minimum, we consider that the MDS should be extended so that it is, at the very least, consistent with the Fulcrum planning permission which approves the principle of development in an area of woodland currently excluded from the MDS. It would be more appropriate, however, to go further than this and extend the MDS designation to also cover the test track, conscious of the extensive areas of hardstanding associated with it, its previously developed character, and recognising that fact that it has an established pattern of continued use for vehicle testing and driver training which is consistent with the principle use of the wider site.

#### **Section 4.1 – Level of Housing Growth 2011 – 2029**

We note that the Council intends to adopt an interim Level of Growth of 12,300 homes over the plan period. We also note paragraph 4.1.1 which confirms that the level of growth proposed *"may be revised pending the findings of the Joint SHMA and the resulting co-operation between the authorities"*. In this respect, we do not consider that it is appropriate to comment on the Level of Growth proposed until such time as the results of the joint SHMA are available, which we understand will not be until later this year.

Linked to this, it is essential that, as part of a sound and robust consultation strategy, there is ample opportunity for key stakeholders to comment on the results of this work and any impact this may have on the Level of Growth for the District. In addition, we consider it important that the Council seeks to meet the requirements of paragraph 14 of the NPPF by progressing a strategy that meets the full, objectively assessed needs for market and affordable housing. Further, the NPPF is one part of a broad pro-growth strategy that the coalition Government has implemented and

continues to support. The NPPF itself states, at paragraph 19, that, "*significant weight should be placed on the need to support economic growth through the planning system*".

In attempting to meet the levels of growth expected to be required the Council should adopt a flexible document that is "*aspirational but realistic*" (Paragraph 154, NPPF) and, in doing so, the Council should consider the role that MDSs, such as the former Honiley Airfield, can play in delivering both residential and employment development to meet the needs of the District.

In particular, the location and physical characteristics of the former Honiley Airfield present an opportunity to accommodate residential development of a modest scale which could help to meet the needs arising in the villages and other smaller settlements in the north and north west of the District, such as Honiley, Beausale and Wroxall. Given the physical characteristics and shape of the site, this could be accommodated without prejudicing the primary use of the site as a vehicle testing facility, nor would it prejudice the delivery of the Fulcrum permission. Indeed the development of a relatively small part of the site, adjacent to the northern boundary with Oldwich Lane East, could act as a catalyst for redevelopment of the wider site, consistent with the Fulcrum permission and assist in delivering the infrastructure required to service this, such as the new roundabout access and the enhancements to the test track, all of which have considerable costs associated with them.

### **Section 4.3 – Broad Location of Development: Housing**

As outlined above, we consider that part of the former Honiley Airfield has the potential to accommodate residential development of a modest scale. This could assist the Council in delivering its preferred option for the broad location of development, and in particular in relation to the growth required in smaller villages and hamlets. The location of the site in the north of the District would offer a suitable alternative location for residential development to meet the needs of the smaller villages and hamlets in that part of the District. Linked to this, we consider that paragraph 4.47 of the Revised Development Strategy could support the use of the former Honiley Airfield for residential uses.

Notwithstanding the above, we have some concerns about whether the preferred option for the broad location of growth is deliverable and, in particular, we would question the ability of a housing market, which is emerging from a recession, to deliver the required housing on sites in close proximity to one another. Specifically, GVA consider that there are a relatively finite number of prospective purchasers for whom South Warwick would be a viable location and this will inevitably have a significant impact on the rates of delivery that can be achieved. We are also concerned that this will limit choice in the location of housing and have a detrimental cumulative impact on infrastructure in the south of the District.

We trust the above comments will be taken into account when progressing the New Local Plan, and we would be pleased to meet with you to discuss our comments further. In the meantime, if you have any queries or wish to discuss any of the above in greater detail, please do not hesitate to contact Mark Sitch or myself.

Yours sincerely,



**GRANT STEVENSON**  
Associate

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