

## Separate Sheet Gerald Eve Representations

### Representation relating to Policy MS2 – Major Sites in the Green Belt

**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.**

#### Background

We write to provide comments in relation to the above Policy with specific reference to the former Honiley Airfield, Oldwich Lane East, Wroxall, Kenilworth (The Site).

The Site was originally developed as a wartime airfield and continued in use, to a very limited degree, until the 1950's. Research and testing of jet engines commenced at that time with vehicle testing (tyres, wheels and brakes) commencing in 1961, with planning applications for various buildings and facilities over the next decades. Planning permission for vehicle demonstrations, driver training, etc. was granted in 2002. Outline planning permission was granted for development of the site for an advanced engineering research and development campus (Class B1 (Business) Uses) for the automotive and motor sport industries, Catalyst Centre, new access road and roundabout, infrastructure, parking and landscaping (including details of the Catalyst building) in 2007, which was renewed on 1<sup>st</sup> December 2011.

We welcome the Council's identification of the Former Honiley Airfield as a key employment site in the District which plays an important role in the local, sub-regional and national economy. The site is considered by the Council to be suitable for B Class employment uses and will be protected for such through the Local Plan. Specifically Policy MS2: Major Sites in the Green Belt sets out that in the case of the Former Honiley Airfield, there may be very special circumstances to justify further development. Furthermore, the policy states that in the case of the Former Honiley Airfield, the range of uses in the site will be restricted to the automotive and motorsport industries and employment associated with these sectors.

#### Proposed Draft Policy

The draft local plan has the following policy in respect of the Site:

***“MS2: Major Sites in the Green Belt***

*Development at existing sites in the Green Belt will be restricted to the limited infilling and redevelopment of previously developed land and will be assessed in accordance with national planning policy.*

*In the case of the Former Honiley Airfield, Stoneleigh Park, and Stoneleigh Deer Park, there may be very special circumstances to justify further development (within the boundary identified on the Policies Map).*

*Where this can be demonstrated, proposals should be brought forward in line with an approved Masterplan or Development Brief which demonstrates that the openness and the purposes for including the land in the Green Belt is retained, and which complies with other relevant policies in this Plan.*

*In the case of the Former Honiley Airfield the range of uses on the site will be restricted to the automotive and motorsport industries and employment associated with these sectors.”*

***Former Honiley Airfield***

*3.149 The former military airfield has been used for a variety of aeronautical and automotive uses since the 1950s and most recently for vehicle testing and research and*

design associated with the automotive industry. It is unique in allowing the co-location of research and development facilities together with a test track for off road testing.

3.150 The site has planning permission for the development of an advanced engineering research and development campus for the automotive and motorsport industries including the provision of a new access and roundabout taking traffic away from the existing access on Oldwich Lane East.

3.151 The site has an important role in delivering the aims of the Coventry and Warwickshire Local Enterprise Partnership (CWLEP) in relation to the growth of advanced manufacturing particularly in the long term through the implementation of the planning permission. Funding has been agreed through the City Deal to secure the delivery of the access and traffic proposals set out in the planning permission. . Further investment is proposed through the SEP to undertake a utilities upgrade to ensure the site is attractive to companies wishing to relocate.

3.152 The Council acknowledges the site's importance to the sub regional economy and is supportive of the approved proposals in the context of the unique role of the site. It is also recognised that the delivery of the planning permission may provide benefits to the wider community such as noise attenuation. However, it is important that redevelopment of the site is carefully managed in the context of the site's sensitive rural location in the Green Belt. This is particularly with regard to the sites limited access to the strategic road network and potential impact of the activities on neighbouring residential communities. It is therefore unlikely than any proposals to extend the range of uses beyond that in the planning permission which are restricted to automotive and motorsport uses would be acceptable.

3.153 In addition to the permission it is recognised that some small scale development may be necessary adjacent to the test track to assist in its operations, however the Council will ensure in assessing any proposals that the openness of the Green Belt is maintained.

3.154 The boundary identified on the proposals map reflects the approved planning unit and defines the areas the Council considers is acceptable for limited development and infilling. This recognises that some of the approved development is located on woodland rather than previously developed land.

## **The Principles of Plan making**

The Local Plan should be progressed in accordance with the National Planning Policy Framework (The Framework) and in particular, it:

*“must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.*

*“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three.”*

*“Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.”*

*“Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.*

*“Crucially, Local Plans should:*

- *plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*
- *be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;*  
(The Framework)

## **The objection**

The principle of the objection is that the policy as drafted has failed to provide a suitable policy basis for the consideration of development on the Site. The policy is therefore not 'consistent with national policy'. As drafted this policy in effect repeats the policy of the Framework in respect of the development of previously developed land located in the Green Belt as set out in paragraph 89:

*"A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:*

*...*

*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 a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development."*

We consider that as National policy no longer recognises Major Developed sites in the Green Belt, a particular policy should be provided for the Site which recognises the real economic benefits of the activity to the local, regional and national economy, and the particular nature of the Site.

The whole of the former airfield is previously developed land and should be recognised as such.

It is considered that the proposed policy wording in the next section reflects the objectives of the Government's National Planning Policy Framework, which sets out a presumption in favour of sustainable development and the need for sustainable economic growth.

The Government expects the planning system to actively encourage growth, giving local people the opportunity to shape communities, whilst providing sufficient housing to meet demand and local need and supporting economic activity. This approach was re-emphasised in the Government's Plan for Growth and budget announcement in March 2011, which aimed to ensure that the planning system does everything possible to support economic growth and sustainable development.

The National Planning Policy Framework sets out the presumption in favour of sustainable development and the need for sustainable economic growth, on which local plans are to be based. This is supported by the Council's and LEP's Strategy for Economic Growth.

An automotive and research related employment site needs to ensure that it can adapt quickly to external forces such as technological advances and changes in market demand. In order to create and to create confidence to attract investment to this site there is a need to support its expansion and to broaden its current operations in the future to assist with the longer term development which will be of benefit to the local, sub-regional and national economy, and this will assist in determination of future planning application proposals.

It is critical that the former Honiley Airfield employment site can be expanded in the future in order that it can continue to fulfil its important role as a Strategic District Employment site in order to provide opportunities to create further jobs on site and widen local employment opportunities.

This employment site has the potential to contribute to the aims and objectives of the Coventry and Warwickshire LEP. The LEP is a partnership led by key businesses and Local Authorities to drive sustainable growth and job creation across the area.

**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.**

In light of the above considerations it is considered necessary, in order to plan positively for sustainable development on the Site, that the following policy be included:

#### **Former Honiley Airfield**

**The Council support further appropriate development on the airfield site in principle.**

**The very special economic circumstances of the Former Honiley Airfield are recognised and the planning policies in respect of the Site are intended to positively plan for the consolidation and appropriate expansion of existing activities. This should be demonstrated, by bringing forward comprehensive proposals in the form of a Masterplan.**

**The Council will support and encourage the development of appropriate uses at the former Honiley Airfield in order to stimulate new economic growth, skills and opportunities and to enhance and maintain the function an automotive and research based site. Any appropriate development and expansion of the former Honiley Airfield will be given positive consideration.**

**The Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.**

**The range of uses acceptable on the site will include purposes related to the automotive and motorsport industries, both commercially and for leisure purposes and employment associated with these sectors including ancillary activities.”**

We support the overall vision and aspirations of the Warwick District Council’s emerging Local Plan. However the above change to draft planning policy is required in order delivery sustainable economic growth.

In addition, given the status of the site as previously developed land, with substantial buildings and structures, it does not perform the function of Green Belt land, and accordingly should be removed from the Green Belt as Part of the Green Belt review.

We would welcome an on-going engagement in respect of these emerging policy principles and ideas. In this way we can limit uncertainty in respect of any policy change and we can also assist with a practical knowledge of the underlying economic influences which ultimately deliver development and the Nation’s growth agenda.

## Publication Draft Representation Form 2014

For Official Only	
Person ID	
Rep ID	

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

**If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.**

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the plan has been made available (see the table below). You can also respond online using the Council's e-Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

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

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH or email: [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)**

### Where to see copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan) and at the following locations:

Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa
Leamington Town Hall, Parade, Royal Leamington Spa
Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash
Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa
Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick
Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth
Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa
Brunswick Healthy Living Centre, 98-100 Shrubland Street, Royal Leamington Spa
Finham Community Library, Finham Green Rd, Finham, Coventry

**Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.**



# 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		Peter
Last Name		Dines
Job Title (where relevant)		Associate
Organisation (where relevant)		Gerald Eve
Address Line 1		72 Welbeck Street
Address Line 2		London
Address Line 3		
Address Line 4		
Postcode		W1G 0AY
Telephone number		+44 (0)20 7333 6207
Email address		pdines@geraldev.com

## 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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the Local Plan.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

For Official Use Only

Person ID:

Rep ID:

## 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:	<input type="text" value="Local Plan"/>
Paragraph Number:	<input type="text"/>
Policy Number:	<input type="text" value="Policy MS2"/>
Policies Map Number:	<input type="text"/>

### 5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
5.2 Complies with the Duty to Co-operate?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
5.3 Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

### 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:	<input type="checkbox"/>
Justified:	<input type="checkbox"/>
Effective:	<input type="checkbox"/>
Consistent with National Policy:	<input checked="" type="checkbox"/>

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Rep ID:



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.

*See separate sheet*

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.

*See separate sheet*

Continue on a separate sheet if necessary

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.**

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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:

To enable the Planning Inspector to fully understand the key reasons why a policy is required for the further appropriate development on the previously developed land at the former Honiley Airfield, in order to positively plan for sustainable development and make the Plan 'sound'.

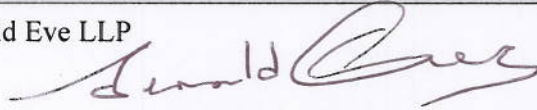
Continue on a separate sheet if necessary

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.

Gerald Eve LLP



Signed:

27/06/2014

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.

For Official Use Only

Person ID:

Rep ID:





**GERALDEVE**

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27 June 2014

**Our ref: PGWD/J6823**

**Your ref:**

**BY EMAIL**

Dear Sir,

**Warwick District Local Plan 2011-2029 – Publication Draft (April 2014)  
Representations in respect of the former Honiley Airfield Site**

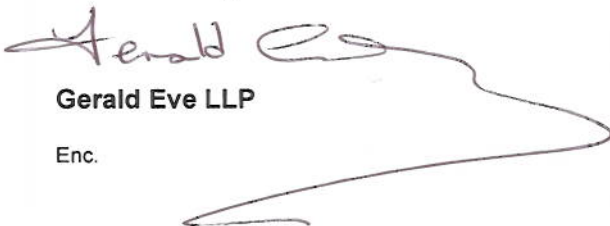
We write to provide comments in relation to the above document with specific reference to the former Honiley Airfield, Oldwich Lane East, Wroxall, Kenilworth (The Site).

Please find enclosed our completed questionnaires and separate response sheet in respect of the Warwick Local Plan Publication Draft Plan consultation. The enclosed documents comprise:

- A completed questionnaire relating to Policy MS2;
- A separate response sheet for questions 7 and 8 of the questionnaire, relating to Policy MS2; and
- A site plan.

Should you require any further information in support of the points put forward in our representation please do not hesitate to contact Peter Dines.

Yours sincerely

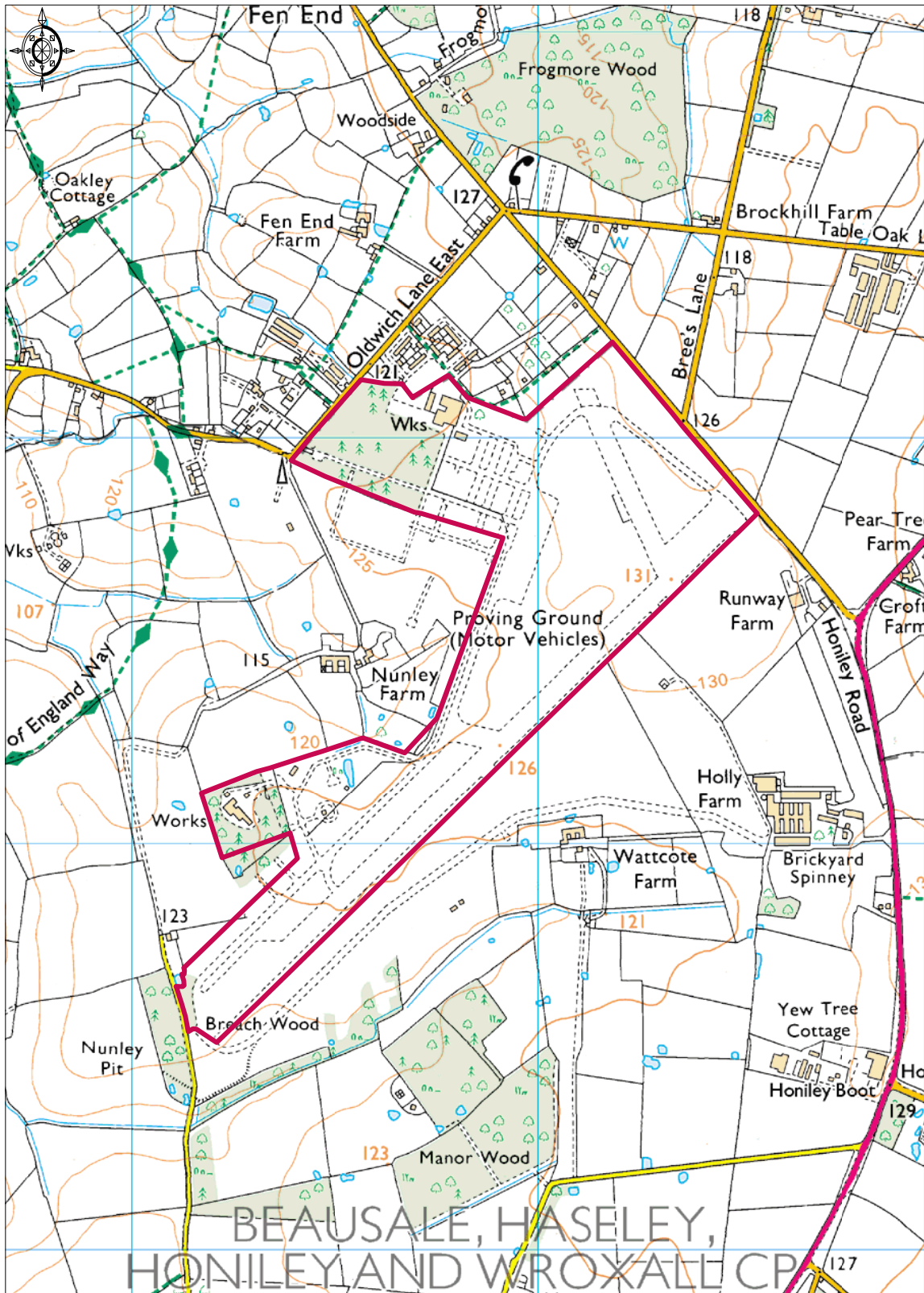


**Gerald Eve LLP**

Enc.



The former Honiley Airfield, Oldwiche Lane East, Wroxall, Kenilworth



BEAUSALE, HASELEY,  
HONILEY AND WROXALL CP

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