

## **Warwick Local Plan 2011-2031- Consultation on Proposed Modifications (2016)**

### **Representations on behalf of Coventry and Warwickshire LEP and Growth Hub.**

#### **Introduction.**

Coventry and Warwickshire Local Enterprise Partnership (CWLEP) is a partnership between the private and public sectors, set up by Government. The LEP was established to help determine local economic priorities, facilitate financial growth and create jobs in the area.

The CWLEP wants to make Coventry and Warwickshire an attractive place to live and work by helping partners and stakeholders to build on the natural assets and advantages of the sub region. As such it takes a keen interest in the long term land use planning of the area and this includes seeking an active role in consultation and engagement processes, such as this, that underpin land use plans, related initiatives and proposals.

#### **Background to these representations.**

Recent market evidence and information<sup>1</sup> has highlighted an increasing shortfall in the amount of land available for future employment growth across Coventry and Warwickshire .It has been suggested that this growing shortfall is currently harming and will further harm the economic growth of the sub region<sup>2</sup>.

The CWLEP is increasingly concerned to ensure that all Local Plans address the shortfall of suitable and sufficient allocations for business and commercial space. The production of these Modifications to the Warwick Local Plan presents an opportunity to address the widespread concerns about a shortage of suitable employment land to meet future requirements in the Coventry and Warwickshire sub region.

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<sup>1</sup> CBRE: "Employment Land Use Study –Coventry and Warwickshire ",August 2015,West Mids Strategic Employment Sites Study 2015 PBA /JLL for W Midlands Chief Executives..

<sup>2</sup> "The lack of suitable space in the quantity identified is likely to be having a detrimental effect on the economic prospects of the LEP area. CBRE above). Conclusions para 1.

The shortfall also has a qualitative element and there is evidence<sup>3</sup> of shortages of suitable employment and commercial space in a number of key economic sectors to meet particular market and sub market sectors. This includes small workshop space, offices, industrial , and general employment premises between 1000-5000 sq. ft.

While acknowledging the limited focus of this consultation nevertheless we feel that the Council should take the opportunity in allocating areas of new development land to review the proposals and to identify areas within some of the larger growth areas for the explicit provision of employment land and business space .Policies should be amended to recognise the need to provide areas of new business space alongside housing provision. The proposals for large mixed use areas (as detailed in DS15) present the potential to specify and identify small areas of the allocations for business uses and the provision of a range of premises.

## Proposed Amendments to Modifications

While the Warwick Local Plan acknowledges the linkage between the provision of housing and employment we believe that the Modifications provide a further opportunity to strengthen this linkage and to explicitly address the need for further targeted allocation of land for employment.

In allocating a range of larger strategic sites across the District in Policy DS15 we consider that there is an opportunity to specifically address the potential for further (small scale) employment allocations within what are mixed use land allocations. Indeed it is an omission that there is no substantive detail in the Modifications relating to the employment content or commercial potential of these larger allocations. This should also include details of the timing and likely release of employment land when it is part of a larger development area.

In identifying these sites the policy requires the comprehensive development to be articulated through “either a Development Brief or a Layout and Design statement” This in itself would provide an opportunity to plan areas for small scale employment use into the land use framework of some of these development areas.

The proposed table in Modification 14 to Policy DS15 should be further amended to make it clear that the schemes should (where appropriate) contain an explicit employment allocation identified by a specific gross floorspace allocation for employment uses .For example the large proposed schemes at Kings Hill and Westwood Heath would appear suitable to accommodate small scale employment opportunities . While the text in proposed changes to DS11 contains reference to employment content for the sites at east Milverton and Kings Hill Lane, the references are vague and lack clarity about content and timing of employment provision .The allocations that make up the urban extension to the south of Warwick and Leamington would also lend themselves to accommodating similar explicit employment allocations .However as planning permissions have been granted on

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<sup>3</sup> Data collected by WCC over the period 2013-2015 shows that of some 240 property enquiries over 48% were for premises between 100 and 5000 sq. ft. and a further 27% were seeking premises of between 5 -20,000 sq. ft.

much of this area and the opportunity to secure the provision of suitable sites as part of a large mixed use area may now have been missed.

The provision of relatively small employment allocations in this way could also provide an opportunity to secure land by way of planning obligation with the relevant landowners. This can be achieved using mechanisms such as Section106 agreements, and can secure the provision of a range of new floorspace provisions for a variety of employment provision. Indeed it may be appropriate in some instances to seek to oblige the sites owners to set aside or provide small serviced areas for employment provision. If over the life cycle of the plan period to 2031 these allocations are not taken up then the monitoring of the plan could ensure that the areas are later released for alternative uses as indeed would be allowed by the application of policy guidance in any event.

We also consider that new policy DS NEW1 Directions for Growth south of Coventry should be further revised to accommodate provision and more detailed consideration of the areas for employment growth. Specific references should be included in the text to acknowledge the potential of areas to provide new development opportunities for increased employment floorspace.

The list of “key objectives “contained within DS NEW1 should be amended to include a requirement to include additional provision of employment floorspace. This will focus landowners and developers on the need to make provision in appropriate mixed uses schemes .Similarly the explanatory text supporting the policies (New1.1-New 1.11) should be strengthened to require the provision of employment land and premises on appropriate sites.

### Summary of policies to be reviewed and amended.

The following policies and modifications relate to the comments above and should be further reviewed by the Council.

DS11.Allocated housing sites .Modification 10

DS15. Comprehensive development of Strategic Sites. Modifications 14&15.

DS NEW1. Directions for Growth South of Coventry. Modifications 20&21.

More detail and supporting information can be provided to reinforce these submissions.