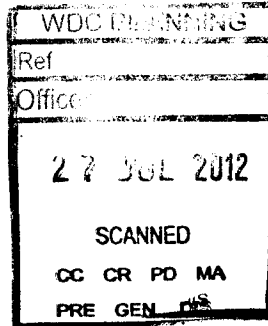


Our Ref: P876/PD/bh
Date: 25th July 2012

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Dear Sir / Madam

**Warwick District Council Local Plan Preferred Options Consultation Document
Representations on behalf of LaSalle Investment Management
Stoneleigh Park**

Thank you for providing Harris Lamb Planning Consultancy (HLPC) with the opportunity to participate in the preparation of the Warwick District Council Local Plan. HLPC are instructed to make representations to the Preferred Options consultation Local Plan by LaSalle Investment Management (LIM). LIM control Stoneleigh Park, one of Warwick District's key employment sites. As such they are a key stakeholder in the preparation of the emerging Local Plan.

Attached to this letter is a completed set of representation forms providing a response to specific policies in the consultation Local Plan as appropriate. This letter provides further details of LIM's involvement at Stoneleigh Park to date and their future proposals for Stoneleigh Park that have a direct impact on emerging Local Plan policy.

Background

LIM have agreed a 150 year lease at Stoneleigh Park with the Royal Agricultural Society of England (RASE). Under this agreement the management and development of Stoneleigh Park is the responsibility of LIM while RASE concentrates on its role as the champion of rural and agricultural advancement. As part of a long term plan to secure the future of Stoneleigh Park there is a shared vision between RASE and LIM to develop the site as a rural innovation science park with an emphasis on sustainability, the environment, agriculture, equine activity and forestry as well as rural businesses and research activities. It is LIM's intention to work with the council, local residents and other interested stakeholders to help revitalise and deliver sustainable development at Stoneleigh Park.

The intention is that Stoneleigh Park should evolve into a national hub for rural and sustainability research alongside an equine centre of excellence and innovation science park. The Park will attract businesses interacting with the agricultural and equine sectors and those involved in the sustainable knowledge based industries. The showground events will continue to provide unique opportunities to showcase knowledge and trade. Farming education and links with higher

education providers will ensure that new methods are exchanged and debated through the existing and enhanced conference and hotel facilities.

Planning Application W/12/0766

In order to help realise the aspiration for the regeneration and revitalisation of Stoneleigh Park an outline planning application has been submitted to the District Council that will be used to guide developments at the park. This planning application is currently being considered by the Council and it is expected that it will be determined during the course of the Local Plan consultation period. The planning application proposes:

Outline planning application for the development/redevelopment and use of buildings at Stoneleigh Park to provide a science, business, technology and innovation park (Use class B1 (a) and B1 (b)), equine facilities, livestock and agriculture facilities, education and learning (Use Class D1), research (Use Class B1 (b)), sustainability and energy, exhibitions, show grounds, hotel and conference facilities (Use Class C1/D1), animal husbandry and animal hospital, business centre, camping facilities, together with other ancillary uses and activities including retail, leisure and catering, associated roads, footpaths, cycle routes, junction improvements, parking, servicing and landscaping (including off-site highways infrastructure) which should support the functioning of the park and demolition of some buildings and infrastructure.

Whilst the application is yet to be determined it is understood that officers are broadly in support of the proposed development. If, as anticipated, the application is subsequently approved it will set a framework for the future development of the park over the forthcoming Local Plan period. The policy to guide the development of Stoneleigh Park in the emerging Local Plan should, therefore, reflect the forms of development identified in the outline planning application.

National Planning Policy Framework

As you are aware, the NPPF confirms that the purpose of the planning system is to achieve sustainable development. Development proposals for sustainable development should 'go ahead, without delay'. The NPPF encourages economic growth by requiring local authorities to ensure sufficient land of the right type is available to support the growth and innovation of all types of businesses. For plan making this means 'local planning authorities should positively seek opportunities to meet the development needs of their area'. The NPPF places a strong presumption in favour of sustainable economic growth and requires local authorities to prepare policies to guide and support this objective.

Specific advice is provided in support of the rural economy in Chapter 3 of the NPPF. Development Plan documents should support economic growth in rural areas in order to create jobs and prosperity. In supporting the rural economy local plans should include policies that facilitate the growth and expansion of 'all types of businesses and enterprises in the rural area, both through conversion of existing buildings and well designed new buildings'. Given that the NPPF provides clear support for enhancing the rural economy and job creation generally it is entirely appropriate for the emerging Warwick District Local Plan to include a policy that guides the redevelopment of Stoneleigh Park as a major rural employment site.

The Plan Making section of the NPPF provides for the advice on policy formulation that suggests that the emerging Local Plan should include a specific policy to guide the development of Stoneleigh Park. Paragraph 157 of the NPPF advises that 'crucially, the Local Plan should allocate sites to promote development and the flexible use of land, bring forward new land where

necessary, and provide detail on form, scale, access and quantum of development where appropriate'. Given that this requirement of national policy it is a specific policy to guide the development of Stoneleigh Park is required in the Local Plan.

Stoneleigh Park Local Plan Policy

The adopted Warwick District Local Plan contains a specific policy to guide development at Stoneleigh Park (Policy SSP3). Given the size and strategic nature of Stoneleigh Park a similar policy guiding development within the boundaries of Stoneleigh Park should be included within the emerging Local Plan. For consistency and completeness this policy should reflect the range of uses that the outline planning application proposes at Stoneleigh Park. Plan. On the 20th April 2012 Mr Patrick Downes of HLPC wrote to Mr Dave Barber of Warwick District Council identifying the preferred wording of a Stoneleigh Park policy. We remain of the opinion that this proposed policy should be included within the emerging Local Plan. The wording of the proposed policy is set out below:

Stoneleigh Park

Development will be permitted at Stoneleigh Park which provides the following uses:

- ***Exhibitions***
- ***Showground***
- ***Rural Business Innovation Park***
- ***National Equine Centre***
- ***Other Equine and Veterinary Uses***
- ***Livestock facilities***
- ***Education and Learning***
- ***Research***
- ***Sustainability and Energy***
- ***Hotel and Conference Facilities***
- ***Visitor Centre***
- ***Camping Facilities***
- ***Ancillary Leisure, Retail and Catering***
- ***Other uses, activities and Infrastructure would support the function of the park.***

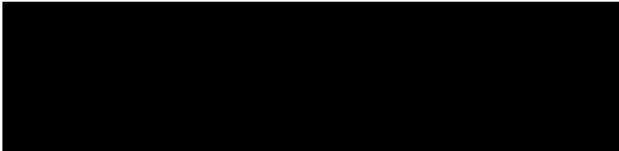
The plan should define the area within the policy applies and we suggest that this coincides with the existing MDS boundary.

The above range of uses coincides with the submitted outline planning application. It allows for a range of uses that will allow Stoneleigh Park to grow as a centre for equine, rural and sustainability excellence. It will facilitate significant investment in Stoneleigh Park creating jobs and improving the quality of this specialist employment site significantly.

Quite clearly the determination of the submitted outline planning application will have a significant bearing on the form a policy. If the outline planning application is approved it would be inappropriate for the local authority to seek to resist a Local Plan policy that sought to allow for the same range of uses approved by the planning application. If the outline planning application is approved it is suggested that the above policy should automatically be found to be acceptable.

I trust you have found this letter and these representations helpful. If you have any queries, or would like to discuss these representations further, please do not hesitate to contact me.

Yours sincerely



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CC: Gary Stephens – Warwick District Council
Chris Mitchell – LaSalle Investment Management
Phil Kennedy – FTI Consulting
Gareth Sinnamon - STACE
Dolly Manwani –STACE
Colin Hooper – LIM
Simon Hawley – Harris Lamb

WARWICK DISTRICT LOCAL PLAN – PREFERRED OPTIONS RESPONSE FORM

Q1. Which documents are you responding to?

Preferred Option Full Version

Q2. Which part of the document are you responding to?

Stoneleigh Park

Q3. Heading / Subheading (if relevant)

8.34

Q4. Map (eg preferred development sites)

-

Q5. What is the nature of your representation?

Support and object

Q6. Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

The recognition that Stoneleigh Park brings significant benefits to local economy that the council is keen to support its on-going viability is supported. However, we are of the opinion with the specific policy should be included on the plan to guide the development of Stoneleigh Park. It is noted that Paragraph 8.35 suggests that the local authority will consider the use of such a policy. It is, however, quite clear for the policy will be required given the bespoke nature of Stoneleigh Park and its significant size. The local authority had previously found it necessary for a specific policy to be prepared and such a policy included within the adopted local plan. There has been no change in circumstances that would suggest it is no longer appropriate for a policy at Stoneleigh Park in a development plan document.

The supporting letter prepared to accompany these representations contains a proposed policy for inclusion within the local plan.

WARWICK DISTRICT LOCAL PLAN – PREFERRED OPTIONS RESPONSE FORM

Q1. Which documents are you responding to?

Preferred Options Full Version

Q2. Which part of the document are you responding to?

Preferred Option: Broad Location of Growth

Q3. Heading / Subheading (if relevant)

-

Q4. Map (eg preferred development sites)

-

Q5. What is the nature of your representation?

Object

Q6. Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

Bullet Point 4 under the Preferred Option Broad Location of Growth Heading, proposed on page 11 of the draft document relates to development within the rural area. In the rural area the plan seeks to focus development in villages with a broad range of services and public transport opportunities with a lower level of growth in some of the smaller villages in order to meet local needs.

Warwick District local plan policy SSP2 - Major Developed Sites in the Green Belt, identifies eight major developed sites in the Warwick District Green Belt. These sites are all in the rural area, as one would expect, and the Local Plan confirms that they are appropriate locations for infilling and redevelopment.

(Ref: P876 – Preferred Option No 2)

Section 9 - Protecting Green Belt Land, of the NPPF does not replicate the guidance on "Major Developed Sites" that was contained in PPG2 – Green Belt. Instead Paragraph 89 confirms that limited infilling or the partial or complete redevelopment at previously developed sites in the Green Belt is appropriate provided that the proposed development 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. Given that the adopted Local Plan and NPPF recognise that Major Developed Sites / Previously Developed Land in the Green Belt is an appropriate location for infilling and redevelopment subject to the openness tests, the policy should include an additional bullet point that confirms that redevelopment of previously developed sites within the Green Belt is appropriate.

WARWICK DISTRICT LOCAL PLAN – PREFERRED OPTIONS RESPONSE FORM

Q1. Which documents are you responding to?

Preferred Option Full Version

Q2. Which part of the document are you responding to?

Absence of Stoneleigh Park Policy

Q3. Heading / Subheading (if relevant)

-

Q4. Map (eg preferred development sites)

-

Q5. What is the nature of your representation?

Object

Q6. Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

The emerging Local Plan should include a specific policy to guide the development of Stoneleigh Park. The existing Local Plan provides guidance on the development of Stoneleigh Park through policy SSP3. However, this policy is based upon the requirements of PPG2 – Green Belts, rather than the guidance in the NPPF. In addition it does not reflect the details of the outline planning application that Warwick District Council are currently considering proposing the regeneration / redevelopment of Stoneleigh Park (planning application reference number W/12/0766). Policy SSP3 is out of date and should be replaced by a new policy Local Plan policy.

A new Stoneleigh Park policy is required to reflect the requirements of the NPPF and the outline planning application. The accompanying covering letter to this representation provides a detailed explanation as to why the policy is needed and sets out our suggested wording.

WARWICK DISTRICT LOCAL PLAN – PREFERRED OPTIONS RESPONSE FORM

Q1. Which documents are you responding to?

Preferred Option Full Version

Q2. Which part of the document are you responding to?

Preferred Options: Economy

Q3. Heading / Subheading (if relevant)

-

Q4. Map (eg preferred development sites)

-

Q5. What is the nature of your representation?

Support

Q6. Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

We support the recognition in bullet point 5 of Preferred Options, Economy – Section of the consultation document that support will be provided for appropriate development in the identified Major Developed Sites in the Green Belt, including Stoneleigh Park. As set out in the covering letter we have prepared a draft policy to guide the development of Stoneleigh Park during the course of plan period.

We note that the policy continues to refer to “Major Developed Sites” in the Green Belt. As you are aware the NPPF removes reference to Major Developed Sites from national policy. In order for the emerging plan to be consistent with the NPPF reference to Major Developed Sites should be replaced with reference to Previously Developed Sites.

WARWICK DISTRICT LOCAL PLAN – PREFERRED OPTIONS RESPONSE FORM

Q1. Which documents are you responding to?

Preferred Option Full Version

Q2. Which part of the document are you responding to?

Preferred Option: Climate Change

Q3. Heading / Subheading (if relevant)

-

Q4. Map (eg preferred development sites)

-

Q5. What is the nature of your representation?

Object

Q6. Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

It is noted that the Council is seeking to adopt a policy that requires a 20% reduction in carbon emissions from new development. This requirement will apply to all residential developments and non-residential developments of 1000 sq m or over.

It is recognised that Section 10 – Meeting the Challenges of Climate Change, Flooding and Coastal Change, of the NPPF requires local authorities to adopt proactive strategies and policies to mitigate against climate change. However, such policies must be underpinned by a robust and credible evidence base. It is not clear from the Preferred Options document how the 20% reduction figure has been established. In order for this policy to be retained the Council should provide evidence on:

- How the 20% requirement has been established.
- Establish and test the implications of the imposition of the 20% carbon emission reduction target on residential development and employment/commercial development. The requirement for the 20% reduction in carbon emissions will have a significant cost implication for new development and growth and has the potential to stifle the delivery of sites. Evidence is required in order to understand the extent of any such implications and how they will affect the plans wider growth aspirations. A viability appraisal should be prepared to demonstrate that this requirement is workable. Without this information the policy cannot be considered robust.

Change of use applications should be exempt from this requirement. It is inherently more sustainable to reuse an existing building than construct new buildings. It should also be noted that this requirement will make it difficult for simple change of use application to be used to bring vacant buildings back into an active use by allowing an alternative use to take place. For example, there are a number of small buildings at Stoneleigh Park that have planning permission for sui generis showground uses. Office based rural businesses could use these buildings subject to a change of use. However, the cost of adapting these offices to reduce carbon emission by 20% could make the change of use economically unviable, thereby stifling economic growth.

If the policy is to be retained it should be recognised that a reduction in carbon emissions can be achieved both from the provision of energy from renewable resources and through sustainable building techniques that reduces the energy consumption of new buildings.

WARWICK DISTRICT LOCAL PLAN – PREFERRED OPTIONS RESPONSE FORM

Q1. Which documents are you responding to?

Preferred Option Full Version

Q2. Which part of the document are you responding to?

Preferred Options Green Belt

Q3. Heading / Subheading (if relevant)

-

Q4. Map (eg preferred development sites)

-

Q5. What is the nature of your representation?

Object

Q6. Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

Section "C" of policy seeks to prevent an inappropriate development in the Green Belt. A series of bullet points identify the forms of development that constitute appropriate development in the Green Belt. An additional bullet point should be added to this policy that states:

Development in accordance with a Development Plan policy guiding the development of specific site within the Green Belt plan.

As referred to in the covering letter a policy should be included in a plan to provide guidance on the redevelopment and regeneration of Stoneleigh Park.

It is noted that the final bullet point in Section C of the policy makes reference to Major Developed Sites in the Green Belt. The term Major Developed Sites is no longer included in national planning policy. The final bullet point should be reworded to reflect the guidance on “Protecting Green Belt Land” set out in paragraph 89 of the NPPF. This bullet point should read:

- 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.

WARWICK DISTRICT LOCAL PLAN – PREFERRED OPTIONS RESPONSE FORM

Q1. Which documents are you responding to?

Preferred Option Full Version

Q2. Which part of the document are you responding to?

-

Q3. Heading / Subheading (if relevant)

Paragraph 2.5 – Economy

Q4. Map (eg preferred development sites)

-

Q5. What is the nature of your representation?

Object

Q6. Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

Paragraph 2.5 – Economy, identifies a series of bullet points that form the key economic vision of the plan. The final bullet point advises that the council seek to promote the regeneration of the more socially and environmentally deprived areas and support the rural economy. We welcome the reference to supporting the rural economy. However, given the significant rural nature of Warwick district and the important role of the rural economy plays in the economy of Warwick as a whole a separate bullet point confirming the council's support for sustainable growth in the rural areas should be provided.

The National Planning Policy Framework (NPPF) provides specific advice on supporting a prosperous rural economy in Chapter 3. It confirms that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy Local Plans should support sustainable growth and expansion of “all types of business” and enterprise in rural areas.

Given the support in the NPPF for the growth of the rural economy it is suggested that a specific bullet point should be added into the economy section of Paragraph 2.5 that states:

Promoting a strong rural economy by supporting the sustainable growth and expansion to all types of businesses and enterprises in the rural area.