

## Warwick District Local Plan – Revised Deposit Version

### Topic Response Analysis

#### Topic: SSP1 Employment Allocations

##### Summary of matters raised in objections.

1. A stronger commitment to safeguarding employment uses is required in order to resist alternative development proposals. Additional text required to emphasise a presumption against other uses unless specified within the commentary  
168/RAA Advantage West Midlands
2. The former Alvis test track site should be allocated in Policy SSP1 and not as green belt as shown on the proposals map and in Policy DAP1. This is a previously developed site and suitable for employment use due to its past and present uses. Consideration should also be given to utilising part of the site for leisure/recreation  
321/RAX West Midlands International Airport Ltd
3. Object to the overall scale of new employment land provision and to a number of 'unsuitable' sites which would reduce supply to 112.93ha (19ha short of the strategic requirement) Suggest land at Gallows Hill, Warwick as suitable site to make up the shortfall  
245/RAA Hallam Land Management and William Davis Ltd

##### Response of Head of Planning & Engineering to matters raised

1. Policy SC2 adequately safeguards committed and allocated sites for employment uses. Whilst employment land is safeguarded by this policy it is however important to consider alternative uses when the land is no longer considered viable for such a use. PPG3 advises that if such land can be demonstrated to no longer be suitable to support employment uses then it should be considered for housing. Policy SC2 also allows the possibility of residential use provided that it is for affordable housing since such a need has been identified. If this is not suitable or forthcoming, then other suitable uses may be considered.
2. The site, although in the green belt, benefits from long term use as a tank and engine testing facility. To remove it from the green belt would remove future control should the current use cease allowing the open character of the surrounding green belt to be jeopardised. It is not considered acceptable, in view of adequate employment allocations, to promote this as an additional site or to remove it from the green belt which may allow the introduction of an unacceptable use, without control, in the future. Recreational and leisure use is not a sustainable use on this site given its isolated location with no links with public transport in close proximity. The open character of the green belt could also be jeopardised if a leisure use was to be introduced which required buildings to be erected. Not all leisure uses would be compatible with the operational requirements of the airport. Currently the land is safeguarded from inappropriate uses by green belt policies.
3. There is sufficient land allocated for employment use and it is not therefore considered that there is a need for further sites to be brought forward at this stage. Should new sites be required, previously developed land in urban

areas would be given consideration ahead of other sites. The land proposed by the objector, is subject to Rural Area Policies in the local plan and would therefore, not be a suitable site for consideration in this regard.

**Recommended revision(s)**

1. No change
2. No change
3. No change

**Topic: SSP2 Major Developed Sites in the Green Belt**

**Summary of matters raised in objections.**

University of Warwick

1. Too much land is being taken by the University within the green belt ((Stoneleigh & Ashow PC – 304/RAB).
2. Paragraph 10.17c does not take account of all relevant environmental and social considerations. The University offers an opportunity to provide for residential uses on site and these should be opposed elsewhere (Robin Richmond - 191/RBA, D. Goodyear – 349/RBA, Leamington Society – 195/RBH).
3. The policy is too restrictive in terms of letting the university expand to fulfil its role (CEPOG – 157/RAB)
4. The University should a specific policy to acknowledge its unique character and contribution to the district. Alternatively the policy should distinguish between sites which are suitable for educational use and those which are not (University of Warwick – 107/RAA).
5. The role of the University as a world class provider of higher education is not fully recognized (University of Warwick – 107/RAB).
6. The status of the current Development Plan, and the work the university is undertaking to update this, is not recognized (University of Warwick – 107/RAC).
7. The reference to the boundary of the MDS should refer to the Development Plan to which it relates (University of Warwick – 107/RAD).
8. Mention should be made of the University's importance within the Coventry, Solihull, Warwickshire hi-tech corridor in para 10.17 (Solihull MBC – RAA).

Woodside Training Centre

1. The reference to the uses at this site should reflect the Centre's educational role (Sundial Group – 147/RAB).
2. The boundary of the site should be increased to reflect its current boundary (Sundial Group – 147/RAC).

Police Headquarters, Leek Wootton

1. The boundary should be extended to include the tennis courts, land to the north and east of the main buildings, and land to the north of the northern drive (Warwickshire Police – 288/RAC).

North Leamington School

1. The boundary of the MDS should be drawn to include the areas of hard play around the buildings (WCC (Property Services) – 104/RAB).

## **Response of Head of Planning & Engineering to matters raised**

### University of Warwick

1. The boundary of the MDS in this location relates to the boundary identified by the 1994 Development Plan for the University. I therefore consider that it is appropriate.
2. I would agree that it is important that any proposals at the University have regard to all relevant environmental considerations and that the University offers an opportunity to provide for residential uses on site. Environmental concerns are already addressed in paragraph 10.17c. Clearly, supporting the University on this site is a way of ensuring that it can be allowed to grow in a way that offers opportunities for students to live on site thereby taking some pressure off other locations and reducing their need to travel. I do not agree however, that this should therefore mean that this Council should oppose applications for off-site student accommodation. There are three reasons for this. Firstly, not all students living within Warwick District are at the University, and it would be impossible to discriminate between students from different colleges. Secondly, student accommodation, properly located, can add to the vitality of towns and especially town centres. Thirdly, if the Council was to require that there was a move to house all students on campus, this would then create increased pressures on sensitive green belt land. The aim of any policy towards the university should be to balance the desire of students and the University authorities to have a vibrant campus where students can live on site with the need to protect sensitive environments.
3. I understand the aspirations of the University to be allowed to expand to fulfill its role into the 21<sup>st</sup> century as a provider of world class education. I also appreciate that the designation of the site as an MDS does put limits on what the university can achieve by way of new development. MDS designation is, however, as far as the Council is able to go under current green belt policy to allow the university the opportunity to expand within the green belt land of the district. Other than removing the University land from the green belt (which in my view would be a strategic amendment to the green belt and therefore one that would have to be made at a strategic level by the Regional Planning body and not through the Local Plan), the identification of the site as an MDS is the most appropriate course of action that the District Council can take to support the expansion of the university.
4. Whilst I can understand the desire of the university to have a separate policy, I consider that its requirements can be adequately met within SSP2 – with some amendments (as set out below). I do recognize that the policy does need to be amended to allow for a wider range of uses than “employment” uses within Use Class B.
5. The University has proposed some additional wording to replace that within 10.17a and I have no objections to this being included within the Local Plan.
6. The University has proposed some additional wording to replace that within 10.17b and I have no objections to proposing that some changes be made as set out below.
7. I agree that this would be helpful addition.
8. I agree that this would be helpful addition.

### Woodside Training Centre

1. As set out above in relation to the University (see 4), I agree that an amendment should be made to allow for a wider range of uses at the Woodside Training Centre.
2. The Council has sought to apply boundaries in a consistent manner across all the proposed MDS's. The objector wishes two areas included; one to the west

that includes the tennis courts and the grassed area to the east of the main residential block. On reflection, I agree that land to the east should be included within the MDS however the land to the west incorporating the tennis courts, which does not form part of the main grouping of buildings, should not be included within the MDS.

Police Headquarters, Leek Wootton

1. A number of changes, some of them very minor, are proposed by the Police Authority. I would agree that some are acceptable as being within the spirit of changes already proposed, however the inclusion of the tennis courts, the land fronting the main group of buildings and the land to the north of the driveway should not be incorporated. No justification has been provided as to why these areas in particular merit inclusion.

North Leamington School

1. I have no objection to this proposal as it is in accordance with boundaries we have proposed elsewhere.

**Recommended revision(s)**

University of Warwick

1. No change
2. No change
3. No change
4. Amend policy SSP2 to read "Within the following major developed sites within the green belt, as defined on the proposals map, appropriate limited infilling and redevelopment for employment **or other uses identified in the supporting text as being appropriate for each site** will only be permitted." Amend paragraph 10.17c to read ".....Identifying the site as a major developed site **within which the various university uses can expand** is the most appropriate means of doing this....."
5. Replace para. 10.17a to read "**University of Warwick. The University is a world class higher education institution which, from its inception in 1964, has occupied land gifted by the Councils of Coventry and Warwickshire, the latter having been in the West Midlands Green Belt. Whilst the majority of growth to date has been on the Coventry side of the boundary, the University has always recognized from its earliest development plans that future growth would rely on the use of the Warwickshire land. The University now considers that this land is critical to sustaining its vision for the long term.**"
6. Amend para. 10.17b to read ".....framework for a planning brief to be prepared. **This brief, the University Development Plan 1994-2004, was adopted as supplementary planning guidance in 1995. It has not to date been fully implemented and remains an appropriate framework against which proposals at the University are considered. Any revisions or updates to this plan, which have been through the relevant adoption process, will be accorded significant weight in determining future applications for development.**"
7. Amend the final sentence of 10.17c to read: An area of 42 hectares has been identified for this purpose, **which reflects the outer limit to development as defined by the University Development Plan 1994-2004.**
8. Amend para. 10.17c to read: "The Council supports the University as a higher education institution of national importance, and is keen to ensure its continued success. **The Regional Spatial Strategy both supports development at**

**Higher Education Establishments and recognizes the University's location within the Coventry, Solihull and Warwickshire Hi-Technology corridor.** ~~Development at Higher Education Establishments is also supported by the Regional Spatial Strategy. It is important, however....."~~

Woodside Training Centre

1. See amendment 4 above.
2. Amend boundary of MDS as shown on plan.

Police Headquarters, Leek Wootton

1. Amend boundary of MDS as shown on plan.

North Leamington School

1. Amend boundary of MDS as shown on plan.

**Topic: SSP3 Stoneleigh Park**

**Summary of matters raised in objections.**

1. CPRE make a large number of comments, all of which relate to the planning application which (at the time) the Council had approved subject to the application being called in (and subject to the completion of a legal agreement) (CPRE – 148/RAV)
2. Stoneleigh & Ashow PC makes a number of detailed comments relating to (1) provision for visitor traffic, (2) monitoring of goods sold in the retail outlets on the site and (3) that any proposal should be in conformity with policy DP7. (Stoneleigh & Ashow PC – 304/RAA).
3. Minor wording changes are proposed to ensure that the description matches the application (AWM – 168/RAC).
4. The wording in paragraph 10.23 should state "...subject to it **not** being called in by the Secretary of State." (RASE – 211/RAA)
5. The principle of uses only being permitted wherethey relate to the promotion of agriculture should be strivtly followed. (W & N Blagburn – 319/AA)

**Response of Head of Planning & Engineering to matters raised**

1. These points are all objections to the planning application. The Council has already given its opinion on this (through its decision to be minded to approve the application). Furthermore, since the Local Plan was placed on deposit, the Secretary of State has confirmed that he does not intend to call in the application. Accordingly, the concerns of CPRE have already been addressed through the decision on the application.
2. These points are already addressed through the details of the (provisional) planning approval and there is no need to duplicate these here.
3. It is suggested that the word "agriculture" be replaced by "rural activities" in accordance with the planning application. I consider this is not appropriate as the reference to agriculture is taken directly from the royal charter of the RASE. The suggestion that the description of the main details of the application be included within paragraph 10.23 is a good one. I do not agree that amendments should be made to paragraph 10.26 that may appear to weaken the importance that the Council places on ensuring that the development takes place in the

- most environmentally sensitive manner.
4. This objection has been overtaken by events (see above). Accordingly the whole reference to call-in should now be removed.
  5. This is clear in the policy.

- Recommended revision(s)**
1. No change.
  2. No change.
  3. Amend para. 10.23 to read: ....over the next few years. ***The proposal is for the development and refurbishment of Stoneleigh Park to provide exhibition, hotel and conference facilities, showground facilities, a business innovation park, visitor centre, leisure and ancillary retail and catering facilities, a National Equine Centre and livestock facilities, together with a new access road and bridge, landscaping, parking, circulation works, an equine bridge and highway improvements.***
  4. Delete the words from paragraph 10.23 "...and subject to it being called in by the Secretary of State."
  5. No change.

**Topic: SSP4 Safeguarding Land for Kenilworth Railway Station**

- Summary of matters raised in objections.**
1. Supports allocation for new Kenilworth Station but suggests that the area shown should be increased by the inclusion of land on Farmer Ward Road on the east side of the railway line (CPRE ref: 148/RBB).
  2. Policy should state that the public transport interchange will be relocated to Station Road, Kenilworth, in the event of a station being built in the town (Kenilworth Society ref: 221/RAG).

- Response of Head of Planning & Engineering to matters raised**
1. All measures will be taken to ensure that the new station is accessible to as many people as possible and that local traffic impacts, including parking on local streets, are minimised. The safeguarded site has a car parking capacity that reflects the anticipated demand profile for the station. Large scale additional parking is not considered necessary at this stage.
  2. The council supports the principle of a public transport interchange at the new station, with details to be determined subject to practical considerations. Work is on-going by the county, with the district's support, to determine the nature and extent of the interchange to be provided. Whether this involves the relocation of the existing transport interchange or the creation of an additional interchange at the station will not be clear until the proposals have been developed in greater detail.

- Recommended revision (s)**
1. No changes required.

2. No changes required.

## Topic: SSP5 Safeguarding Land for Warwick and Leamington Spa Park and Ride

### Summary of matters raised in objections.

1. The area of search should be narrowed to the strip of land between the Spur Road and the M40 (Bishops Tachbrook Parish Council ref 135/RAJ).
2. The need for a park and ride needs further and full appraisal. The lighting, fencing and intrusive parking of cars would undermine the openness of the area at Greys Mallory (CPRE ref 148/RAW).
3. SSP5 should be deleted as no case has been made that such a scheme would be viable or contribute to sustainability goals (James Mackay 199/RAL).
4. Area of search should be amended to exclude the landfill site at New House Farm (Environment Agency ref: 226/RAM).
5. The proposed area for the park and ride will not meet the needs of those accessing Warwick from the North. It should be located near the A46 and for those exiting the M40 from the North. Longbridge Island is therefore recommended. This would also accommodate visitor traffic from Stratford (Warwick Town Council ref 266/RAC).
6. The proposed park and ride site conflicts with other policies in the plan ie. RAP10 Safeguarding Rural Roads and DAP4 Protecting Nature Conservation, Geology and Geomorphology (Mrs J Drake ref 317/RAA).

### Response of Head of Planning & Engineering to matters raised

1. I am currently seeking advice from the County Council on whether it would be appropriate to widen the area of search to include this site. Initial consideration suggests that it is likely to prove more costly than a site directly on the roundabout and may have less impact in reducing congestion at that roundabout. This issue can be aired at the Park & Ride Round Table.
2. The need for a park and ride is demonstrated in the *Warwick and Leamington Spa Park and Ride – Stage 2 Feasibility Study*, produced by Faber Maunsell for the County Council in January 2004. This study also identifies the Greys Mallory area as the best location for such a facility. Further work is on-going to determine the exact location of the park and ride in the Greys Mallory Area of Search. Detailed siting, layout and design of the facility will ensure that any environmental impacts are minimised.
3. See response to 2. above.
4. This detailed information will be reflected in the selection of a site within the proposed area of search.

5. In order for the facility to be viable it needs to serve both Warwick and Leamington town centres. The only area able to do this is Greys Mallory, where a significant proportion of both Warwick and Leamington-bound traffic could be persuaded to switch to a bus service. The suggested area performs less well in reducing vehicular traffic than the sites within the defined area of search.
6. The need for the park and ride will be weighed against any local environmental impacts, including affecting the nature of rural roads and any impacts on fauna and flora. Further work is currently underway to assess the environmental impacts of a park and ride facility at each of the sites within the area of search. This will be taken into account in selecting the most appropriate site as described in para 10.33A of the reasoned justification. The need to minimise and mitigate any environmental impacts would be taken into account in the detailed siting, layout and design of the facility.

**Recommended revision (s)**

1. No changes required.
2. No changes required.
3. No changes required.
4. No changes required.
5. No changes required.
6. No changes required.

**Topic: SSP6 Safeguarding Land for the Barford By Pass – No objections received**

**Analysis for topic SSP7 Coventry Airport to follow.**

**Topic: SSP8 Hatton Country World – No objections received.**

**Topic: CH 10 OM – Chapter 10 Omissions**

**Summary of matters raised in objections.**

1. Object on the grounds that the plan should protect riverside access between Stratford and Warwick and a possible extension of navigation (Stratford and Warwick Waterways Trust ref: 3/RAA).
2. There is concern over the lack of a specific policy on access into and through the former Warwick Castle Park (The Ramblers Association ref: 7/RAA).
3. Object to the omission of a policy in support of the provision of a Marina within the urban area of Warwick (Warwick Town Council ref: 266/RAJ, Delta Marine ref: 324/RAA).
4. Plan should include site specific policy on Warwick Racecourse to support improvement of facilities (Racecourse Holdings Trust Ltd ref: 303/RAG).
5. Object that no further allocations of land are proposed for new housing.

Plan should at least allow for individual proposals (Andrew Cooke ref: 347/RAA).

6. Objects to the omission of a policy to allocate Oldhams Transport site for mixed use development - duplicate objection to 289/AB (Taylor Woodrow Developments Ltd ref: 289/RAA).

#### **Response of Head of Planning & Engineering to matters raised**

1. An extension of navigation between Stratford and Warwick would require massive engineering works involving a significant change to the current river network (the introduction of locks to by-pass weirs/ dredging and the canalisation of the upper Leam to accommodate boat traffic). This project was the subject of a scoping report prepared in the mid 1990's that sought to identify the range of issues that an environmental assessment would have to address. The Upper Avon Navigation Trust has failed to submit such an assessment for this Council to determine its position for or against such a proposal. In the interim the project was put to Warwickshire County Council where Members determined that it should not be supported / given County Council backing. In light of the lack of strategic support and the volume of objections to this proposal (plus the reluctance to forward an environmental assessment for consideration) it is not considered that this project should merit the safeguarding of a corridor for the purposes of boat traffic. A planning application with full supporting evidence (an EA) would appear the most likely way forward if this proposal were to be pursued.
2. As stated in response to the first draft representation the local plan is not the appropriate document to propose / allocate the provision of footpath access through Warwick Castle Park. The local plan does however provide the planning framework to consider such proposals when these are brought forward. It is more appropriate to set out detailed public access routes / initiatives within the Local Transport Plan following liaison between Warwickshire County Council as the transport authority and the land owner. The provision of public access may also be included through planning obligations negotiated as part of new development. For example changes proposed to policy SC10 in the Revised Deposit Version make provision for contributions to be sought in appropriate circumstances towards footpaths.
3. Additional wording was included within the Revised Draft Local Plan (RAP13) to refer to the development of marina facilities and acknowledge that these are more likely to be appropriate in urban areas (subject to other policies within the plan). Rather than allocating a particular site for marina development it is considered that the policy framework is sufficient to determine proposals as these come forward.
4. I do not consider that further development at the racecourse will raise any development issues which cannot be dealt with by existing policies in the Plan, in particular, through the Development Policies and Designated Area Policies. This is particularly so since in the changes to Proposals Map 2, the racecourse buildings have been removed from the Area of Restraint.
5. The plan in itself does not preclude the development of individual houses except in cases where the oversupply of housing is contrary to the requirements of Regional Spatial Strategy. This is given more detail in the response to Appendix 2.

6. See first deposit draft response to Chapter 10 Omissions (ref: 289/AB).

**Recommended revision (s)**

1. No changes required.
2. No changes required.
3. No changes required.
4. No changes required.
5. No changes required.
6. No changes required.