

WRITTEN STATEMENT IN RESPECT OF:

MATTER 5: ECONOMY AND EMPLOYMENT LAND – E2 - LAND EAST OF KENILWORTH

Introduction

1. These representations focus upon the issue raised by the Inspector at Q6 under Matter 2, namely:

Is the allocation of land currently in the Green Belt at Thickthorn Kenilworth for employment development justified. What evidence supports this? What effect would this proposal have on the openness of the Green Belt? Are there exceptional circumstances to alter the Green Belt, if so what are they?

2. These representations are submitted on behalf of those parties with an interest in the land under allocations H06 and E2 and comprise:

The McDaide Family

The Hibbert Family

Kenilworth Rugby Club

Kenilworth Wardens Cricket Club

The Trustees of the Stoneleigh Estate

3. These interest comprise all the land interests within the land allocated under Policy H06 and E2.

Q6; Is the allocation for employment development (E2) justified?

4. Although the WDLP has identified two allocations of land for housing (H06) and employment (E2) the allocations form part of a sustainable urban extension to Kenilworth, and in planning terms comprise a mixed use allocation. The Framework states at paragraphs 27-28:

*Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for **employment** (emphasis added), shopping, leisure, education and other activities.(28)*

*For larger scale residential development in particular, planning policies should promote a mix of land uses in order to provide opportunities to undertake day-to day activities **including work on site** (emphasis added). (29)*

5. The housing allocation under H06 is clearly a 'larger scale residential development'. Within the allocation provision will be ordinarily made for supporting uses including education facilities; local shops and services; health facilities and recreational space. It is entirely appropriate in the interests of good planning that in support of promoting sustainable patterns of development (Framework 84) that provision for a strategic scale of residential expansion of Kenilworth should be supported by a commensurate scale of new employment development.

Q6; What evidence supports this?

6. Supporting evidence is provided by the Framework in seeking to achieve sustainable development – the golden thread running through plan making and decision making. Evidence of the appropriateness in making an allocation of land for new employment development at Kenilworth is further sourced from a consideration of the existing portfolio of employment land in Kenilworth. Firstly the employment areas are mainly located to the north of the town, and as such are not conveniently located for new residents at allocation H06 to have the opportunity to walk to a place of employment. Secondly the general form and character of existing employment development in Kenilworth is somewhat dated. The Warwick District Employment Land Review (ELR) Update Final Report 2013 states:

*The concentration of industrial units in Kenilworth is to the northeast of the town centre. Key industrial locations are Common Lane Industrial Estate and Princes' Drive Industrial Estate. **The estates generally comprise small industrial estates with older buildings.** (emphasis added) (Figure 13)*

7. Figure 16 ELR describes the individual characteristics of these main employment areas within the town namely:

Common Lane: *The estate comprises arrange (sic) of older units, many in need of investment.*

Princes Drive: *A medium sized industrial estatedating from the 1980s*

8. Paragraphs 8.13 -8.14 of the ELR state:

8.13 *Whilst this is not an established employment location and adjoins high value residential areas, Site 36 provides a good opportunity to provide an employment allocation as an element of larger residential led development. The site has excellent access to the A46 and Kenilworth town centre. The supply of employment space in Kenilworth is limited and tis site would provide the opportunity to accommodate an office led development which could meet local needs as well as wider District Council needs requiring access to the A46 corridor.*

8.14 *Further feasibility and master planning will be required to assess the most suitable location and scale of employment development. Our initial view is the most appropriate location would be in the south west corner of this site, adjacent to the A452 Leamington Road and A46. This is the most prominent location, with visibility and accessibility from the A46. We would suggest a site area of circa 10 hectares is identified in this location for employment development, which should be able to accommodate office development of 25 – 30,000 sq m. providing opportunities for larger headquarters type buildings along with smaller buildings to meet more local needs.*

Q6; What effect would this proposal have on the openness of the Green Belt and the purposes of including land within the Green Belt?

9. It is submitted that there are exceptional circumstances to release H06/E2 from the Green Belt in order to meet the development needs of the District by establishing sustainable patterns of development, which include mixed use urban extensions. The A46 forms a clearly defensible and enduring boundary to the redrawn Green Belt to the east of the town. The essential features of the Green Belt and the purposes it serves will not be undermined by the release of H06 E2 from the Green Belt. It is clearly not possible to development E2 – as a Greenfield site for employment development (or indeed residential development) without a major change in the appearance and character of the land east of Kenilworth. The urban edge and its interface with the Green Belt to the east of the A46 can be mitigated through sensitive master planning in the provision of strategic planting and the design of new buildings. The Green Belt to the east of A46 will not be ‘threatened’ by the allocation of E2 as the characteristics of the land are quite distinct to the land west of the A46 with the dual carriageway forming an effective ‘long stop’ to the extension of Kenilworth in an easterly direction.

Q6; Are there exceptional circumstances to alter the Green Belt if so what are they?

10. The redrawing of the Green Belt to the east of Kenilworth is justified in order to meet the development needs of the District through achieving a sustainable pattern

of development that is consistent with place making principles set out in the Framework. The allocation E2 is further justified in making provision for the employment needs of Kenilworth in broadening the portfolio of employment land so as to attract modern commercial development into a highly sustainable location, consistent with the principles of the ELR.

11. This justification to form sustainable pattern of development on the urban edge of Kenilworth amounts to 'exceptional circumstances for redrawing the GB to allocate E2 as part of a mixed use development with H06 (the subject of further representations under Matter 7b)