

Warwick District Council
Local Plan Examination
Response to Inspector's Initial Matter and
Issues

Matter 5

The economy and employment land
Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the economy and employment land

August 2016

Policies DS1, DS8, DS9, PC0, EC1, EC2 and EC3

1) What is the basis for the overall amount of employment land planned in Policy DS8? Does evidence support this and is it justified? Is it realistic and how does it compare with past take up rates?

a) Policy DS8 in the submitted Plan sets out that the plan will provide a minimum of 66 hectares of employment land to meet local need over the plan period. This assessment of the local need is derived from the 2013 Employment Land Review Update (EC03). There are three components to the requirement:

i) Net requirement support forecast employment growth

A net requirement for employment land was derived from economic forecasts, totalling 36ha. This is made up of a need for 31ha of land for office and R&D uses, a 9.5ha requirement for local B8 uses and an anticipated net loss of 4.6ha of industrial land associated with contracting lower value manufacturing uses.

ii) Margin

A margin of 16.5ha is then included based on take-up over the previous 5 years, recognising:

- The potential for a margin of error associated with the forecasting process;
- The need to provide a choice of sites to facilitate competition in the property market;
- The need to provide flexibility to allow for any delays in individual sites coming forward.

iii) Potential replacement of existing employment areas

A number of sites currently in employment use are proposed for redevelopment within the Plan (as listed in Paragraph 2.28) as they are of a poorer quality, are in inappropriate locations and considered incapable of meeting future business needs. Provision is made for losses of employment on these sites. This component results in a need for 13.5ha.

b) The Employment Land Review Update included a cross-check against past (gross) completions data in drawing conclusions on the requirement. Past take-up of employment land has averaged 3.5ha per annum between 2000 and 2012 on site over 0.4ha (see para 6.29 of EC03). The period included years prior to 2008 when completions averaged around 5 hectares per annum and the recessionary years after 2008, when completions were significantly lower. Projecting this forward resulted in a need for 63.5ha over the plan period, reinforcing the reasonableness of the forecasts.

2) How does it relate to overall jobs growth estimates and what is the relationship between overall housing and employment land provision?

a) Policy DS8 deals only with local employment land needs. It is based on expected growth in full-time equivalent jobs of 7,500 in B-class sectors between 2011-30 (EC03, Figure 23).

b) The level of housing provision planned (18,640 dwellings) will result in above-trend

population growth is expected to result in workforce growth of 22,500. This includes provision to meet unmet housing needs from Coventry as well as meeting local needs. The answers set out in response to Matter 2 Question 15 explain how this results in a balance between workforce growth and jobs growth, thereby providing a reasonable balance between overall housing and employment land provision

- c) Additional employment generation is expected to arise both through delivery of the Sub-Regional Employment Site (several thousand jobs and up to 7,800) and through the job-creation associated with population growth in health, education and consumer-related services (retail, leisure etc.). Overall a balance between workforce and economic growth is expected

3) What is the current situation regarding development so far in the plan period and existing commitments?

- a) Since April 2011 a total of 6.36ha of employment land has been completed.
- b) A further 8.62ha of land is currently under construction (excluding the 64ha development underway at the sub regional site).
- c) A further 32.03ha have planning permission granted, either in outline or in full.
- d) The completions and commitments are detailed in Appendix A.

4) What is the basis for the proposed site allocations in Policy DS9? How were they identified and what options were considered?

- a) Following the Focussed Changes consultation there are 3 sites allocated in DS9;
- Land at Stratford Road (11.7ha),
 - Land at Thickthorn (8ha) and
 - Tachbrook Park (6.1ha)
 - land totalling 25.8ha.

The Policy also acknowledges the role the sub-regional employment site is likely to make in meeting local needs and assumes 6.5ha of the sub regional site will meet local needs, with remainder contributing the Coventry's needs. This is illustrated in Figure 11 of the Economic and Demographic Forecasts Study – December 2012, HO02.

b) Land at Stratford Road:

- i) The site, which consists of land primarily owned by Severn Trent Water, Warwick District Council and a third party private land owner, was proposed following the Draft Plan consultation in 2014 and subsequently added to the plan during the Focussed Changes Consultation in October - December 2014. The site was brought forward as a result of the need to find an alternative to the proposed allocation of land North of Gallows Hill that was constrained by availability and deliverability issues. The land owners of the Stratford Road site (except WDC) submitted representation to the

Publication Draft suggesting the suitability of their site. A Sustainability Appraisal (SA08) was published at the time of the Focussed Changes that confirmed the suitability of the site.

- ii) The site benefits from excellent access to the strategic road network as well as close proximity to Warwick town centre. It is well located to meet the needs of businesses as set out in section 7 of EC01.

c) Land at Thickthorn

- i) The requirement for an allocation of employment land at Thickthorn was established in the Employment Land Review of 2009 (EC05). Potential future employment land allocations were assessed by GL Hearn in the Employment Land Review Update (EC03) Section 8. Sections 8.12 – 8.14 identifies the allocated land as being most suitable for employment uses of the potential sites in Kenilworth, with its prominent location adjacent to the A46 being key. Further, the employment land at Common Lane, Kenilworth was considered to be sub-optimal and better suited to other uses such as possible residential development, thereby creating a greater need for appropriate employment land in the town. Whilst it is not expected that all of the businesses displaced from Common Lane would relocate to Thickthorn, the replacement of jobs in the immediate locality of Kenilworth was an important factor.
- ii) The Sustainability Appraisal of the site in SA10 also incorporated the housing development. Its conclusions were primarily positive, with negatives for the impact on the historic environment due to the residential development's proximity to a Scheduled Monument and a Grade II Listed Building. Further negatives were concluded as the site is currently within the Green Belt. However the site is severed from its landscape by the A46 and is assessed as having low landscape value. On balance the SA concluded the site should be progressed.

d) Tachbrook Park:

- i) This is a reallocation of five parcels of land within Tachbrook Park that have expired planning permission. The site underwent a Sustainability Appraisal in SA05, which found that the site had the potential for a major long term positive effect on the economy, as was all indirect minor positive effects on health and poverty and social exclusion. There were no negative effects noted.

e) Other options considered

i) Land at Opus 40

This site was originally allocated in the Publication Draft Local Plan. However, following further work and the establishment of a viable allocation at Stratford Road, the site was reallocated from employment land to residential as part of the Focussed Changes in 2014. A Sustainability Appraisal of the site was undertaken as part of SA05 which was subsequently updated in SA10 to reflect its new allocation for housing development.

Although the site was not unsuitable as employment land, the replacement Stratford Road site was considered more suited for current employment needs and the Land at Opus 40 was being promoted for residential use and was considered to have good potential to meet a part of the housing need.

ii) Land North of Gallows Hill

This site was also originally allocated in the Publication Draft Local Plan. It was reallocated as for housing as part of the Focussed Changes of 2014, following the allocation of Stratford Road site as a preferred option. This was partly because the landowners made representations clarifying that the land was not available for employment uses and partly because the site had good potential to meet part of the District's housing need. A Sustainability Appraisal of the site was undertaken as part of SA05 and updated with the employment allocation removed as part of SA10 (p321 for housing).

iii) Fen End (Former Honiley Airfield)

The north western part of this site is already partly in employment use and has planning permission for further development. This part of the site is subject to Policy MS2 in the Draft Local Plan. However, representations have been received from agents of the landowners (Reps 66628 and 67491) suggesting that the area identified in MS2 is too restrictive and proposing an extension to the area of employment land to incorporate the proving ground (the former runway area). Whilst the Council recognises that the north western part of the site has, for historic reasons, a role to play in supporting the advanced manufacturing and engineering sector in line with CWLEP ambitions, the evidence does not support a significantly extended area in this location for the following reasons:

- The area is remote from existing settlements and does not therefore provide a sustainable location in line with the Local Plan Strategy and paras 17, 30 and 34 of the NPPF
- The area is in the Green Belt and is open in nature. As a result, development here would significantly compromise the openness of the green belt.

iv) Additional land at Stratford Road

Through the Focused Changes Consultation in 2014, representations were received (rep 67246) suggesting an extended area of employment land should be allocated at Stratford Road. Since then the Council has carefully considered this site for employment uses. Initially concerns were raised about flooding and the Environment Agency was unable to confirm its support for development here without a more detailed assessment. The Council understands that this assessment has now been completed and that the Environment Agency is satisfied that the flood risk can be appropriately mitigated. If this is the case and safe access can be provided, then the Council would accept that this area is potentially suitable as an employment site. However, during the current plan period, the employment allocations set out in Policy DS9 are sufficient to meet the employment needs of the District.

5) What issues do the sites raise in terms of potential impacts, constraints and infrastructure requirements and how would these be addressed?

a) Land at Stratford Road

i) Potential impacts

- a. The site is close to Leaffield Farm and its associated woodland, which lie within the Grade 1 Castle Park conservation area. It is the view of the Landscape Character Assessment (LA03) that the site is sufficiently screened by woodland as to be visually separate from Castle Park. The Assessment concludes that with appropriate landscaping that an attractive setting for development could be created, and a recommendation to safeguard or enhance the Stratford Road frontage.
- b. The LCA defines the relative value of the setting for Warwick and Leamington as “Low to Medium”. Although within the current rural policies areas, the Assessment notes that the site’s setting is urban fringe and given the committed development on adjacent sites, the agricultural nature of the site is increasingly anomalous.
- c. A specific Heritage Assessment was conducted on the site as part of the Heritage Assets Assessments, HE04PM (Section 19). The Assessment concluded that development of the allocated site would have “no more than a “Moderate Adverse Impact on the historic environment” (Section 19.7) and that the site needs a staged programme of mitigation.
- d. The Longbridge Ecology Report (B05) assessed the ecological impact of developing the proposed allocation. Whilst recommending some further detailed studies for specific species the Report found no presence of protected species. The report made a series of ecological enhancements suggestions in section 5.3.
- e. In order to assess the traffic impact, a Strategic Transport Assessment, TA4, was conducted. The Assessment concludes that there would be some localised interference from the development, but that there was no strategic impact on the network. The Highways Agency was satisfied that the allocation would not have an undue impact on the operation of M40 Junction 15.

ii) Constraints

- a. FW07 analyses the fluvial flooding risk within the site (and land adjacent) and provides two potential options for alleviation to the current risk of fluvial flooding. Implementation of either of these should lead to a satisfactory resolution of the fluvial flooding risk.
- b. The geographical proximity to the Severn Trent Sewage works means that most of the site falls within the cordon sanitaire. Severn Trent has undertaken an odour assessment and considered how odour issues could be mitigated though

investment in the Treatment Works. With the appropriate investment, this suggests the odour issues can be sufficiently well mitigated.

- c. There is a right of way held by a private third party over the southern edge of the site, and this issue would need to be resolved before development can be brought forward. It is felt that an agreement would be able to be reached and progressive dialogue with the holder continues.

iii) Infrastructure

- a. Depending on the precise composition and disposition of employment uses to be delivered on this site it is likely that there will be impacts on the local highway network. At the point of determination of planning applications, this will require a comprehensive Transport Assessment to establish what physical and/or financial contributions will be required to mitigate the impacts of the development. It is likely that the following items will be subject to consideration;

- Access arrangements
- Adjustments / alterations to the wider highways network (including cycleway and footpath connectivity where appropriate) and in particular the A429 Stratford Road Corridor identified in the Infrastructure Delivery Plan (IN07PM).
- Green travel plans
- Public transport contributions

- iv) Objections were received during the consultation primarily around the suitability of the allocation when available land for development existing in Tournament Fields. As noted above, the allocation of employment land takes into account the existing undeveloped allocations from the previous plan, and they contribute to the provision of the required 66ha, the quantum being derived from a robust base of data, contained within the ELR.
- v) Further objections were raised regarding the impact on a listed building, the environmental impacts and also on the entrance to Warwick. These are addressed in the Sustainability Appraisal (SA08) and Heritage Appraisal (HE04PM) which concludes that the impacts are limited and can be mitigated, and that further studies should be undertaken to establish the type of mitigation required regarding air and noise pollution.

b) Land at Thickthorn

i) Potential impacts

- a. **Heritage** There are existing heritage assets within and adjacent to the site wider, including Grade II Listed Building at Thickthorn Manor and Glasshouse Roman Settlement SAM, however none of these are proximate to the proposed employment land, and the heritage impact assessment indicates that impacts can be mitigated.

- b. **Biodiversity** The wider site includes ancient woodland and a local wildlife site. Evidence (B03 & B04) suggests appropriate buffering to these assets will mitigate harm.
 - c. **Loss of agricultural land:** The development of housing and employment land will result in the loss of some grade 1 and 2 agricultural land. However, the Council contends that the public benefits of housing and employment opportunity in this location out-weight the loss of agricultural land. Representations have indicated concern about the loss of farmland.
 - d. **Pollution:** The Sustainability Appraisal (SA10) recognises that air, light and noise pollution are likely to increase (albeit in a minor way) - particularly in the short term during the construction phases. This may affect the residential areas to the east of the site. The SA considers that suitable mitigation can be set out through development management policies in the Local Plan and will also be available at the project level to address negative effects. This matter has been raised by objectors. The Council contends that the public benefits of housing in this location out-weight any air, light and noise pollution.
 - e. **Transport and Traffic:** Feasibility work undertaken by the landowners demonstrates transport impacts can be mitigated. Furthermore works identified in the Strategic Highways Transport assessment to surrounding key nodes in Kenilworth will improve capacity. Concerns about traffic congestion at peak times can be mitigated by these measures.
- ii) Constraints
- a. The allocation consists of farming land and is impinged by very few constraints. The underlying geology feeds a principle aquifer and any development must not compromise the quality of the water.
- iii) Infrastructure requirement
- a. Depending on the precise composition and disposition of employment uses to be delivered on this site it is likely that there will be impacts on the local highway network. At the point of determination of planning applications, this will require a comprehensive Transport Ass to establish what physical and/or financial contributions will be required to mitigate the impacts of the development. It is likely that the following items will be subject to consideration;
 - Access arrangements
 - Adjustments / alterations to the wider highways network (including cycleway and footpath connectivity where appropriate) as identified in the Infrastructure Delivery Plan (IN07PM) Appendix A in the A452 Leamington to Kenilworth Corridor or any other appropriate works (including mitigating any possible impacts to Kenilworth town centre)
 - Green travel plans
 - Public transport contributions

- c) Tachbrook Park: This allocation is for land in Tachbrook Park where planning permission has expired.
- i) Potential impacts
- a. As this site is a previous allocation significantly developed upon there are no additional potential impacts created by this allocation. The Sustainability Appraisal (SA10) carried out identified no negative impacts from the allocation, beyond the short term potential for increased waste production connected with the development and longer term with the increased occupation.
- ii) Constraints
- a. There are very few constraints associated with the site, as it is made up of several undeveloped parcels of land within an existing business park. The land being allocated is clear of substantial vegetation and is not in need of significant remediation before development can commence. Indeed, two of the allocated five parcels of land have been granted planning permission since the allocation was proposed (Planning ref W/15/0144 and W/14/1846) and construction has commenced on one.
- iii) Infrastructure requirements
- a. There are no additional infrastructure requirements as a result of the allocation. However, depending on the precise composition and disposition of new applications this may be revisited on a case by case basis.

6) 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 openness of the Green Belt and the purposes of including land within the Green Belt? Are there exceptional circumstances to alter the Green Belt, if so what are they?

- a) The three stage process for assessing exception circumstances has been set out in para 14 of the Distribution of Development Paper (HO25PM).
- i) Is there an essential need that has to be met?
Yes, Kenilworth is in need of additional employment land. The total quantum of land required to meet local need was established in the Employment Land Review 2009 (EC05), with Thickthorn identified as the most suitable site to accommodate the required growth in Kenilworth. Furthermore, following the Employment Land Update 2013 (EC03), it is proposed that Common Lane Industrial Estate is re-allocated from employment to residential uses, heightening the necessity to allocate the site in order to meet essential need. The town is surrounded by Green Belt and there are significant levels of out-commuting, with only 31% of residents working within the town (Figure 4.17m SHMAA, HO03).
- ii) Are there any suitable sites outside the Green Belt that can meet this need?
Kenilworth is surrounded by Green Belt and there are no suitable brownfield sites within the town
- iii) Is this the best site within the Green Belt to meet the need?

The site is severed from its natural landscape of open land and Green Belt by the A46 and Warwick Road, the main road into Kenilworth. To its east is land allocated elsewhere in the Local Plan as housing land (see Matter 7b HO6). The proposed allocation is a discrete landscape parcel with established visual enclosure and as such its removal from the Green Belt will have only very limited effect on the openness of the Green Belt. The roads that sever the site from its natural landscape provide a clearly defined and defensible boundary to development. The Green Belt Study (LA07PM) reviewed the purpose of the Warwickshire Green Belt and assessed individual parcels quality against this. The allocated site was considered to only be of mixed quality, and its primary function is to check unrestricted sprawl, preventing towns merging, safeguarding the countryside from encroachment and preserving the setting of historic towns. Infilling between the existing road boundary and the residential edge of Kenilworth will have only very limited effect on the purpose of the Green Belt or impact on the openness of the remaining Green Belt.

- b) The established need for a quantum of employment land throughout the district, the appropriateness of a proportion of that employment land to be in Kenilworth and the lack of alternative non-Green Belt development sites in or around Kenilworth amount to exceptional circumstances.
- c) The clearly defined nature of the site, and particularly the impact of the A46 in severing the site from the remaining Green Belt, means that its removal from the Green Belt will not have undue impacts on the ability of the remaining area to continue to fulfil the fundamental aims of green belt.

7) Are the sites realistically deliverable? What evidence is there in this respect?

a) Land at Stratford Road

- i) This site is in close proximity to Tournament Fields and benefits from much of the infrastructure in place. It is also close to the strategic road network.
- ii) The ownership of the land is principally held between Severn Trent Water and WDC and a third party private landowner. Although there is not currently a binding agreement between the principal parties, the parties have been proactive in putting their portion of the site forward as suitable for employment land allocation through the plan process. Positive conversations are currently taking place between the principle land owners. Indeed, representation was received during the Focussed consultation from Framptons on behalf of Severn Trent, Mr & Mrs Webb and Mr & Mrs Preston / Barwood Developments advocating the extension of the proposed site to create a larger quantum of employment land. The additional land was, following modelling work and Flood Assessment was deemed suitable by the Environment Agency, although this came forward too late to be included within the Focussed Changes consultation
- iii) The close proximity of the sewage works means that odour treatment will be required in order to bring forward the development. Work conducted for Severn Trent Water, show that significant mitigation is possible with regards to odours and that the required mitigation is viable.
- iv) The relocation of the Sita depot, situated on WDC land is underway and is expected to be

vacant imminently, making this part of the site deliverable as soon as the investment in the treatments works is complete.

b) Land at Thickthorn

- i) The site has excellent access to the A46 as well as Kenilworth town centre. The site would provide the opportunity to provide for the otherwise restricted demand for office-led development in Kenilworth and for the wider District needs for the A46 corridor.
- ii) During the Publication Draft consultation representation was received from the agent representing the three land owners of the sites making up the conjoined employment and housing allocations reasserting their intention to achieve the formal release of the land from green belt through the local plan process and their intent to bring the land forward promptly upon allocation and release.
- iii) With the support of Warwick District Council, assisted by ATLAS, Kenilworth Town Council has employed RCOH to prepare a concept framework plan for the strategic site allocations in Kenilworth. This work will support both the Local Plan allocations and the emerging Kenilworth Neighbourhood Plan. A series of workshops have been arranged in September and October with relevant landowners, developers and key stakeholders and a joint plan/statement will be submitted to the examination prior to hearings for Matter 7b.

c) Land at Tachbrook Park

- i) This land is previously allocated employment land within an already developed business park. The allocation covers land where planning permission had lapsed. As such, there are little to no additional infrastructure requirements and the sites could be delivered very quickly. Since allocation was proposed two of the five parcels of land have had planning permission granted for employment use and work on these sites has commenced. A third parcel of land has had permission granted for the relocated bus depot (from land used in the Station Approach housing allocation – H10), which whilst classed at sui generis does provide for substantial employment.

8) Is the approach to new employment development set out in Policy EC1 appropriate?

- a) Policy EC1 seeks to direct employment development to town centres as well as existing and committed employment areas, whilst also ensuring rural growth is sustainable and maintains the rural character
 - i) Offices in urban areas: New office developments – use class B1 (a) - are permitted within the town centres, whilst restricted in other places (unless conforming to specific criteria laid out in the Policy). This recognises that offices are main town centres uses as set out in para 23 of the NPPF. The concentration of office development within town centres concentrates similar developments, encourages sustainable patterns of development and maximises use of existing infrastructure. The Employment Land Review Update – ECO3 – notes that such development is likely to take the form of mixed use town centre schemes, but that there is a need for the provision good quality new office provision within the town centres. This is especially the case in Leamington

Town Centre where a number of enquiries made with Invest In Warwickshire for medium to large modern offices are currently unable to be met, and the current ongoing refurbishment of Regent Square House offers the only opportunity for such office lets.

- ii) Other employment in urban areas: Other employment uses will be directed to specific locations (criteria a-c of EC1) unless it can be shown that there are no suitable sites available within them. This ensures that employment uses, apart from town centre office developments, are concentrated on the allocated sites, supporting the agglomeration principles of the CWLEP Strategic Economic Plan (EC02) as well as the clustering principles in NPPF para 21.
 - iii) Other non-B class employment uses: A class uses will be directed to the town centres, as will other appropriate town centre uses, as outlined in the Retail and Town Centres Policies (TC1-TC18).
 - iv) Rural areas - Development in rural areas will be permitted in order to promote sustainable development, diversification of agricultural land or the growth and expansion of existing rural businesses. It will also be permitted at the green belt employment sites detailed in Policy MS2 and also the sub regional site in Policy DS16, but resisted elsewhere within the Green Belt.
- b) Objections were raised regarding the potential restrictiveness of this element policy with regards to rural growth. There were concerns that as such the economic growth of villages would not match the increase in dwellings, leading to greater vehicle usage and commuting and that requiring applications to demonstrate that they would not generate significant traffic movements likely to compromise the wider objectives of Policy TR2. However Policy EC1 seeks to align with paragraphs 21, 22 and 23 of the NPPF in direct employment uses to the most sustainable locations. The policy does allow for rural employment uses to help support the vitality of the District's rural areas. The approach taken seeks to balance the requirements of paragraph 28 of the NPPF against the need to promote sustainable transport. It therefore focuses rural employment opportunities on specific sustainable locations and/or specific uses that are best provided in the rural areas.
- c) Several objections were raised about the inclusion of references to the sub regional employment site, although these will be covered in Matter 6.

9) What would be the effect of the policy on office development? Is this justified and consistent with national policy? In particular does it fully reflect the sequential approach to main town centre uses?

- a) As a result of the policy, office developments will be concentrated in town centres, allocated and existing employment sites, major sites in the Green Belt and the sub regional employment site. This is in accordance with the conclusions from the Employment Land Review Update (EC03). The Review concludes that the confined development opportunities and lower rents within town centres mean that small to medium office developments as part of mixed used schemes are likely, and much needed given the latent demand and historic core of the portfolio. Larger, modern premises with a higher parking ratio are more likely to be developed in the new and existing allocations. The allocation of appropriate edge of centre sites is consistent with para 23 of the NPPF, where viable alternatives are absent and the allocated sites are well connected. The effect of the policy therefore would be the

creation and maintenance of a portfolio of opportunity that meets needs established through ELR Update (EC03) and the Strategic Employment Land Study (EC01) and supporting the sub regional strategic aims of the CWLEP SEP (EC02).

- b) The effect of this policy will be to concentrate employment growth in town centres, existing employment sites and committed allocations. Such concentrations allow for more sustainable development as well as offering businesses the advantages of clustering of companies and sectors, as supported in para 21. The allocation of employment land at Thickthorn is well connected to the town centre of Kenilworth as well as the A46, and thus it will be of direct economic benefit to the town centre. The same can also be said of the reallocation of the land in Tachbrook Park as an established edge-of-town development with strong connectivity to Leamington Spa town centre. The land at Stratford Road is classed as 'urban fringe' in Sustainability Appraisal (SA08) and therefore should be considered edge of town. The close proximity to both the strategic road network and the town centres of Warwick and Leamington means that the site is consistent with national policy, specifically para 23, as there are no alternative comparable sites in Warwick Town Centre and the site is "well connected to the town centre" as well as to the strategic road network. Furthermore, work carried out as part of the Strategic Transport Assessment Phase 4 (TA5) showed there would be only minimal additional impact on the road network following mitigation.
- c) EC1 specifically references the sequential approach to developments outside of EC1 criteria a-c. This ensures edge-of-town locations will only be considered if there are no suitable locations in town centres. This is consistent with the sequential approach laid out in NPPF para 24. The exemption of the allocated sites from the sequential test ensures that development is concentrated in discrete and appropriate locations and is in compliance with paragraphs 23 and 24 of the NPPF.
- d) EC03 details the current stock of employment land and notes the significant shortage (and demand for) good quality modern accommodation. It also notes that the town centres are unlikely to be able to provide fully for employment needs due to land constraints, physical building constraints and the lower rents obtained. It is, therefore, appropriate to remove the allocated employment sites from the sequential test to ensure the widest choice of growth opportunities is available in order to meet the established need.

10) What would be the effect of the policy on non-office development? Is this justified and consistent with national policy? In particular does it provide sufficient flexibility?

- a) The effect of the policy on non-office development will be that such development is primarily concentrated around allocated and existing employment sites. This would mean non-office developments are clustered, thereby concentrating infrastructure benefits and requirements as well as providing opportunities for agglomeration benefits, as outlined in the CWLEP Strategic Economic Plan (EC02).
- b) Through the ELR Update (EC03) it is projected that there will be a requirement of 9.5ha B8 development through the plan period. The site at Thickthorn has been specifically allocated for mixed B1 and B2 usage only due to it being part of a wider residential development.

Consequently B8 requirements would be concentrated on existing sites, the sub-regional employment site and the other sites allocated in DS9.

- c) There is recognition of the requirement to further analyse the long term trend analysis and balance this with greater analysis and understanding of market signals. This is acknowledged in the Employment Land Memorandum of Understanding (EXAM44) and work on better collating and analysis of market signals is being led by CWLEP and will report in the New Year.
- d) The approach of concentrating non-office B class usage is consistent with the wider clustering encourages in Para 21 of the NPPF. Further, Policy EC1 consistent with the LEP's SEP (EC02) approach to agglomerated development around transport corridors and their sub regional Strategic Employment Land Study (EC01), thereby being consistent with NPPF paragraphs 160 &161.
- e) The portfolio of allocated employment land in the Plan, both in terms of location and available plot size, allows for suitable flexibility, and responds to the market signals identified in the ELR Update (EC03). Further, in the ELR Update the projected demand shows a small decrease in B2 requirements and only a modest increase in B8 requirements, which will be able to be accommodated within appropriate allocated or existing employment land.

11) Are Policies EC2 and EC3 appropriate? How are they consistent with national policy?

- a) Policy EC2 recognises that farm diversification is important to sustained rural economic health, and helps to guide such diversification so that any development is sustainable, in keeping with the rural character whilst supporting economic growth and is therefore appropriate. The Policy's key points are;
 - i) Retention of best and most versatile agricultural land - Whilst the diversification of the rural economy is to be encouraged and welcomed, retention of the highest grade agricultural land is appropriate in order to retain the rural character and to maintain farm viability.
 - ii) Scale such that development can be integrated without being detrimental – Retention of rural character is an important consideration, and overweening developments will have a negative impact on that environment. Further, larger scale development may lead to a dispersal of activity that affects the vitality of nearby town centres, contrary to NPPF paragraph 23.
 - iii) Existing buildings are used in preference to new buildings – as these retain the rural character and minimise the impact on the landscape. This is consistent with paragraph 109 of the NPPF “protecting and enhancing valued landscapes”.
 - iv) Through the consultation objections were raised regarding the potentially restrictive nature of the policy, arguing that rural economic growth would be fettered.
- b) Policy EC2 is consistent with the NPPF, specifically paragraphs 18-21, 28, 89 and 90.
- c) Policy EC3 helps ensure an adequate supply of quality employment land in a variety of

locations, delivering a diverse portfolio of growth opportunities by not permitting change of use away from employment use classes of committed or existing employment land or buildings. Permission may be granted if certain conditions exist. However, these exemptions are removed for the sub regional employment site.

- i) It is appropriate for the Plan to ensure the protection of employment land, whose need has been established in the Employment Land Review and subsequent update (EC05 and EC03), and whose locations has been analysed through the Sustainability Appraisals (SA05 and SA08).
 - ii) There are instances where the employment use of the allocated land is no longer the most appropriate. These circumstances are detailed in the exceptions. Such a policy is in line with NPPF paragraph 22 which ensure that Plans do not protect employment land unnecessarily.
 - iii) Given the unique nature of the sub regional site, and to further protect the employment designation of the site, that allocation was specifically removed from the exceptions. Through consultation, objections were raised about this specific exclusion. The sub regional site issues are discussed in Matter 6; however, the exclusion of the site from this policy was in order to prevent it being developed as affordable housing, thus ensuring that it delivers the quantum of employment to justify the exceptional circumstances for its release from the Green Belt.
- d) Policy E3 is consistent with the NPPF, specifically paragraphs 18-22, 89 and 90.

Warwick District Council Examination In Public
Matter 5 – The economy and employment land
Appendix A

Available Employment Land 2016			
	With planning permission	Under Construction	Completed at August 2016
Siskin Drive	64ha	Demolition ongoing w/15/0344 – 64ha	
Tachbrook Park	0	Plot 1600 (W/15/0144) - 0.92ha* Plot 1000 (W/14/1846) – 1.54ha	
Queensway Industrial Estate	0.62 ha (outline permission)		
South Heathcote Lane (Warwick Gates)	0.6 hectares W/11/0549		
Tournament Fields (land adjacent to the A46)	2.33 ha (outline permission until 2019)		
Spa Park	1.15 ha W/10/1039		
Stoneleigh Deer Park	5ha (major redevelopment application) W/15/1614		
Tournament Fields	Outline – 5.48 remaining (until 2019). Note RELS entry do not take off area for independent hospital and care home (2.24)	Plot 7001 – 3.77ha* Plot 5001 W/15/1820 - 0.61ha	Plot 8002 (care home) W/15/1983 – 0.53 Plot 3001 W/15/0185 – 0.60ha
Cape Road			0.90 ha W10/0160

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Appendix A

Land rear of Homebase	1.6 ha		
Land at Nelson Lane	0.5ha (allocation in local plan)		
Former Honiley Airfield	10 ha outline planning permission 8.22ha remaining	1.78ha W/15/1419	
Station Area Former Fords Foundry	1.33 ha detailed permission W/16/0490		
Land at High Street	0.2ha		
Stoneleigh Park	5ha (additional floor space associated with Masterplan) W/12/076		

* for these sites, the planning permissions are implemented and site work has commenced. The buildings themselves are not yet being built

Summary table 2011 onwards	
Completed 2011 to 2016	April 2011 – 0.4 April 2012 - None April 2013 - 0.47 April 2014 – 1.93 April 2015 – 2.06 August 2016 –1.50