

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

Matter 6
Sub-Regional Employment Site
Issue

Whether the Sub-Regional Employment Site proposed in Policy DS16 is justified, effective and consistent with national policy.

August 2016

Policy DS16

In order to fully answer the questions raised in Matter 6, a Statement of Common Ground has been drafted between Warwick District Council and Coventry and Warwickshire Development Partnership LLP (the site promoters) and is attached as Appendix i.

Questions

1) What is intended in terms of the scale, type and mix of development? What would be the extent of built development in the Green Belt?

- a) The allocated site is a total of 235ha, and allocated as a major employment site for B1, B2 and B8 uses.
- b) Further details, including draft and indicative site plans, are in the Appendices of Appendix i.

2) What is the current situation regarding the planning history and status of the site?

- a) The wider site has had a number of planning applications, of which two are of specific note;
 - i) W/12/1143 - This application was called in and subsequently refused by the Secretary of State.
 - ii) W/16/0239 - This application, for development of Whitley South, was granted and not called in by the Secretary of State.
- b) Further details are included in paragraphs 2.1 to 2.8 of Appendix i.

3) What would be the effect of the proposal on the purposes of including land within the Green Belt?

- a) The site falls with parcels C9 and C10 of the Joint Green Belt Study 2015 (LA07PM). Both parcels play an important role in preventing towns merging and in safeguarding the countryside from encroachment.
- b) Green Belt issues are considered in detail in the report to Planning Committee for the CWG Planning Application (EXAM 47A) and in the Inspectors report (EXAM 1).
- c) The Inspector states at paragraph 860 that the proposed development would “*amount to an element of strategic harm to the Green Belt in this respect*”.
- d) Whilst the allocation does not result in immediate coalescence with Baginton, the Inspector’s report concludes that the development would contribute to the merging of Coventry with other nearby settlements and would result in encroachment on the countryside, thereby conflicting with the purposes of the Green Belt.
- e) Encroachment would be mitigated by the retention of 111ha of the allocation as Green Belt, reducing encroachment on the countryside.

f) Paragraphs 3.1 to 3.13 of Appendix i contain further detailed description of the effect.

4) What would be the effect on the openness of the Green Belt?

- a) An allocation of this scale will inevitably impact on the openness of the Green Belt in that locality. However, the Council contends that the residual Green Belt (Broad Area 3) will continue to fulfill to essential characteristics as set to in paragraph 79 of the NPPF.
- b) This is augmented by the important role the proposed Country Park plays in providing clear and strong defensible boundaries. As detailed in DS16, 111ha of the allocation is to remain as Green Belt and will provide key landscape features. This will minimise visual and noise impact and support the openness of the surrounding Green Belt.
- c) See Appendix i paragraphs 3.1 to 3.13 for greater detail on the effect of openness.

5) What would be the effect in terms of:

- **The landscape and the character and appearance of the area**
- **Heritage assets**
- **Biodiversity**
- **Transport**
- **Other issues**

How would these be addressed / mitigated?

- a) Landscape and character – The landscape surrounding the allocation is primarily rural, however the area of allocation was describe by the Inspector of the Gateway application as “urban fringe”. In order to mitigate impact, a significant proportion of the allocation (111ha) will be retained as open Green Belt with improved public access.
- b) Heritage assets – The allocation is adjacent to Lunt Roman Fort, a scheduled monument and SA09 significant mitigation is required to ensure that negative effects on the setting do not occur.
- c) Biodiversity – The Sustainability Appraisal for the sub regional site, SA09, notes that the site development has the potential to significantly affect biodiversity, although appropriate mitigation could reduce this to the extent that the result would only be a minor residual negative effect.
- d) Transport – The site is well-connected to the strategic road network, although the significant size of the allocation requires key off-site works in order to mitigate impacts. Significant elements of these have been completed (i.e. Whitley Junction) and other elements are subject to a resolution to grant planning permission of the Whitley South scheme (W/16/0239).
- e) Other issues –

- i. Flood risk: the proposed flood compensation storage would deliver a net benefit and there have been no objections from the Environment Agency or Severn Trent Water to the proposed allocation.
 - ii. Site contamination: the proposals associated with the CWG application dealt with this matter satisfactorily. Therefore with the right mitigation, this need not be a significant constraint on the development of the site.
 - iii. Air quality: the Local Plan air quality report (A04PM) concludes that air quality is predicted to improve during the Plan period. This accords with the conclusions arising from the consideration of the CWG application.
- f) For further details on all of the above points, see paragraphs 4.1 to 4.20 of Appendix i.

N.B. Appendix i has considered all the representations received in relation to Policy DS16 and has addressed all these points in answering question 1 to 5.

6) How does the proposal sit with the need for employment land identified in Policy DS8?

- a) The allocation of the sub regional employment site is in addition to the quantum of employment land established to meet local need in DS8.
- b) As detailed in Matter 5 there is likely to be a small amount of displacement of local need into the sub regional site, and this is accounted for in the total amount of employment land allocated in DS8.
- c) See paragraphs 5.1 to 5.31 of Appendix i for further information.

7) What is the evidence in terms of the need for such a site? And specifically in this location? How would it relate to wider employment land needs, other sites in the sub-region and economic strategies?

- a) The need for significant sub regional employment sites has been considered and confirmed in the Coventry & Warwickshire Employment Land Use Study (EC07PM) and the West Midlands Strategic Employment Sites Study (EXAM42).
- b) Furthermore, the Employment Land MoU (EXAM44) has confirmed the necessity for Warwick District to meet some of the unmet need from Coventry as identified in Coventry Employment Land Review (EXAM43). This allocation will meet this requirement in full.
- c) The location was considered optimal given its strategic transport links, and its proximity to Coventry and its unmet need.
- d) The allocation is in line with the Strategic Economic Plan of the CWLEP (EC02) which features the allocation as the largest development, supporting their aspirations for unlocking investment and supporting economic growth.
- e) Appendix i paragraphs 5.1 to 5.31 contain further detail of the need, especially in response to

the Secretary of State's decision to refuse the initial 'Gateway' application.

8) What would be the benefits in terms of job creation? What evidence is there to support this and is it sufficiently robust?

- a) The Council has estimated that up to 7800 jobs could be created as a result of the development of this site. Whilst there is some uncertainty regarding this due to variations in assumptions about job densities, especially for warehousing uses, the Inspector concluded (para 993), that,
... the likelihood is that, assuming a high occupancy of the development, a substantial number of jobs in the order of several thousand and possibly up to 7,800 would be created.
- b) This is based on independent work carried out by GL Hearn to support the assessment of the CWG planning application. The calculation utilises the standard HCA Employment densities Guide.
- c) The commitment of JLR to take space at the Whitley South site provides added certainty on the scale and quality of jobs that will be created.
- d) Further details are included in paragraphs 6.1 to 6.3 of Appendix i (WDC / CWDP Statement of Common Ground)

9) Would it be competing with other sub-regional sites or employment land generally?

- a) Paragraphs 7.7 to 7.10 of Appendix i (WDC / CWDP Statement of Common Ground) consider the up to date position regarding the availability of employment land at Ryton, Rugby Gateway and Ansty Park. This concludes that the supply of land at these sites is now very limited due to high level of take-up in recent years.
- b) The CBRE Employment Land Study (EC07PM) considers alternative employment sites and concludes that the CWG site performs extremely well and is the most suitable location for a site of sub-regional significance
- c) Further details are included in paragraphs 7.1 to 7.13 of Appendix i (WDC / CWDP Statement of Common Ground)

10) Would there be potential for displacement of jobs from existing locations?

- a) Pages 27 and 28 of the Report to Warwick District Planning Committee 12th June 2013 (EXAM 47A) consider the matter of displacement with regard to the CWG planning application. The report refers to work carried out by GL Hearn, which predicts 21% of the jobs on the logistics part of the site and 26% of the jobs on the technology part of the site are likely to represent displacement from existing companies in Coventry and Warwick District. They also predict that this would account for 70% of all the jobs that are displaced (in other words 30% of the jobs would be displaced from outside Coventry and Warwick). Overall they

consider 77.5% of the jobs would be new jobs for Coventry and Warwick District.

- b) Further information regarding the inspector's conclusions on the CWG application are in paragraphs 6.1 to 6.3 of Appendix i (WDC/CWDP Statement of Common Ground)

11) Would there be other benefits, including physical/environmental benefits? If so, what would these be?

- a) In addition to job creation the site will deliver:
- i. A significant area of land for managed open space (Country Park)
 - ii. Improved recreation facilities and public access
 - iii. Biodiversity enhancements
 - iv. Reclamation of significant areas of contaminated ground
 - v. Improvements to the highways network and sustainable transport measures (including public transport)
 - vi. Increased productivity
 - vii. 900 construction jobs per year and a build cost of £250m
- b) Further details are included in paragraphs 8.1 to 8.8 of Appendix i (WDC/CWDP Statement of Common Ground)

12) Could the economic benefits of the proposal be achieved from developing elsewhere?

- a) Since the consideration the Coventry and Warwickshire Gateway planning application, the West Midland Employment Sites Study (EXAM 42) and the CBRE Study commissioned by the Coventry and Warwickshire LEP (EC07PM) have been published. These show that opportunities for this need to be provided elsewhere have diminished and that there is clear evidence that this site is important in meeting the sub-region's needs. The Coventry Employment Land study (EXAM 43) further emphasises the importance of providing a significant amount of the employment land close to the City.
- b) The approval of the Whitley South planning application further underlines the case for this location, particularly as the transport links have been and will continue to be improved as a result.
- c) Further details are included in paragraphs 7.1 to 7.13 of Appendix i (WDC/CWDP Statement of Common Ground)

13) Would the proposal be realistically viable and deliverable? What are the potential constraints to development and infrastructure requirements and how would these be overcome?

- a) The site is available and continues to be promoted for development. The submission and approval of the Whitley South application and the commitment of JLR to invest in the site provides further evidence of its viability and deliverability.

- b) Further details are included in paragraphs 9.1 to 9.6 of Appendix i (WDC/CWDP Statement of Common Ground)

14) In overall terms is the proposal justified and are there exceptional circumstances to justify altering the Green Belt? If so, what are they?

- a) The justification for the site is based on a compelling economic need coupled with a lack of supply of suitable sites to meet this need. Specifically:
- i. Employment land supply in the area is at a critically low level (EC07PM)
 - ii. There is unmet employment land need arising in Coventry that will need to be met in an adjoining authority, preferably close to the City's boundary (EXAM 43 and EXMA 44)
 - iii. The LEP is committed to economic growth (EC02) and has identified this site as a priority
 - iv. Employment Land studies (EC01, EC07PM) consistently identify this site as a priority employment site
 - v. The site is capable of delivering a significant number of jobs (at least several thousand and potentially up to 7800)
 - vi. The site is capable of accommodating the development need in a sensitive and sustainable way
- b) The Council contends that this provides the exceptional circumstances to justify the removal of the site from the Green Belt
- c) Further details are included in paragraphs 10.1 to 10.15 of Appendix i (WDC/CWDP Statement of Common Ground)

WARWICK LOCAL PLAN EXAMINATION

MATTER 6: SUB-REGIONAL EMPLOYMENT SITE

Statement of Common Ground

between

Warwick District Council

and the

Coventry and Warwickshire Development Partnership LLP

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1.0 INTRODUCTION

- 1.1 This Statement of Common Ground has been prepared in response to the Inspector's questions under Matter 6 – Sub-Regional Employment Site, Policy DS16.
- 1.2 It has been made by Warwick District Council and the Coventry and Warwickshire Development Partnership LLP (the promoters). The sub-regional site is referred to in this Statement, as the Coventry and Warwickshire Gateway site or CWG site.
- 1.3 The CWG site was the subject of a planning application and call-in inquiry. This Statement therefore draws upon the evidence presented to the Inquiry and the conclusions of the Inspector and Secretary of State, in providing answers to the questions posed under Matter 6.
- 1.4 A response to each question is generally set out in order, however where appropriate some questions are combined and a single response given.

2.0 BACKGROUND: PLANNING HISTORY AND SITE STATUS

Matter 6 questions 1 and 2

- 2.1 There have been two relevant planning applications relating to the land proposed to be allocated under Policy DS16.

The Coventry and Warwickshire Gateway application

- 2.2 The first, submitted in September 2012, was for the comprehensive development of all the land covered by the proposed allocation together with highway works which extended into the Coventry City administrative area. Referred to as the Coventry and Warwickshire Gateway (CWG) scheme, the application was resolved to be approved by both Warwick District Council and Coventry City Council but was called-in and subsequently refused by the Secretary of State in February 2015. The Secretary of State's considerations and decision on the CWG application is directly relevant to the consideration of Matter 6 and a number of the specific questions posed. This Statement of Common Ground therefore has regard to and draws heavily on the Secretary of State's decision. A copy of the Secretary of State's decision and Inspector's Report has been added to the Examination Library (ref EXAM01).

- 2.3 Whilst the physical characteristics and environmental context of the site remain largely unchanged since the Secretary of State's decision, there are a number of key changes in circumstance relevant to the consideration of Matter 6 and the context within which the Secretary of State's decision should be viewed. The changes are drawn out in the Statement where appropriate, but in summary they are:

- The agreed need for and undertaking of a sub-regional Green Belt Review by the Coventry and Warwickshire Local Authorities in order to help to identify land to accommodate significant housing and other land use requirements, including unmet needs arising from Coventry Council;
- The publication of a comprehensive Employment Land Study undertaken by CBRE on behalf of the LEP;
- The publication of the West Midlands Strategic Employment Sites Study by PBA & JLL;
- Work undertaken by G L Hearn to inform the Coventry Local Plan;
- The submission for examination of the Coventry Local Plan;
- The Employment Land Memorandum of Understanding has been agreed by the Coventry & Warwickshire Joint Committee (EXAM44)
- The on-going take up of employment land in the area and resulting diminishing supply;
- The submission and resolution to approve the Whitley South application (see 2.6 below);
- The commitment of Jaguar Land Rover to expand significantly its level of accommodation, investment and employment in and around Whitley.

- 2.4 The details of the CWG application demonstrate the intended scale, type and mix of development that could take place on the DS16 site. The application description of development is copied and attached at Appendix One to this Statement together with a copy of the Parameters plan and Illustrative Masterplan.
- 2.5 Following the Secretary of State's refusal of the CWG application, further discussions have taken place between the site promoter and the local planning authority in relation to the appropriate approach to the southern edge of built development. The illustrative plan attached at Appendix Two (drawing 4772-L-01) shows how development could be amended from the approach proposed in the CWG application.

The Whitley South Application

- 2.6 An application was submitted in February 2016 for the development of land at Whitley South. The application was submitted jointly by Jaguar Land Rover and Coventry City Council. The application covers part of the site which formed the CWG scheme. The form and timing of the application was a direct response to the requirements of Jaguar Land Rover to expand its accommodation at its existing long established site at Whitley and the lack of alternative, available and suitable sites. The application was resolved to be approved by both Warwick District and Coventry City Council in April 2016 and the Secretary of State confirmed that he did not wish to "call-in" the application for determination at the end of May 2016. The Section 106 legal Agreement is currently being finalised and once this is completed and signed the permission will be issued.
- 2.7 The Whitley South application covers most, but not all, of the area identified as Zone B in the CWG application. The mix and quantum of uses and approach to scheme parameters and masterplan reflect those set out in the CWG application. Details of the application (description, parameters plan and illustrative masterplan) are attached at Appendix Three for reference.
- 2.8 The Local Planning Authorities' and Secretary of State's decision regarding the Whitley South application are directly relevant to Matter 6.

3.0 EFFECT ON THE GREEN BELT

Matter 6 questions 3 and 4

- 3.1 The whole of the proposed sub-regional employment site lies in the Green Belt. Part of the proposed allocation is proposed to be removed from the Green Belt, where built development is intended. The remainder of the allocation is proposed to be retained in the Green Belt, with this area proposed to be utilised for landscape and visual mitigation, improved recreational access, open space and biodiversity enhancement as well as other ancillary functions. The approach adopted in the CWG application accords with this strategy.
- 3.2 A great deal of analysis of Green Belt issues was undertaken as part of the assessment and determination of both the CWG application and Whitley South application. The conclusions of the Secretary of State on the CWG application are directly relevant (paragraphs 16 and 17 of his decision and paragraphs 846 to 870 of the Inspector's Report), although as set out above there are matters which update the position since that decision; notably the Whitley South application. The proposed changes to the southern edge of the scheme, compared to that proposed in the CWG application, is also relevant to this matter. The reduction in the scale of the proposed development together with the reconfiguring of the anticipated layout of buildings and services increases the 'green infrastructure' and landscaping in that part of the site.
- 3.3 It is also pertinent to note that the test applied by the Secretary of State to the CWG application was the need to demonstrate very special circumstances which would outweigh the harm to the Green Belt by way of inappropriateness and any other harm. The test to be applied here is that set out in the NPPF paragraph 83, which states that "*Green Belt should only be altered in exceptional circumstances, through the preparation or review of the Local Plan*". Paragraph 84 also advises that "*when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development*".
- 3.4 Since the decision on the Gateway scheme there has been no material change to the condition of the site and although additional Green Belt study work has been undertaken to help inform the preparation of Local Plans, this would not affect the Secretary of State's consideration of the value of the site. A key change since the decision is the commitment by both Coventry and Warwick, in the Local Plan preparation, to a comprehensive review of the Green Belt to accommodate land use requirements. Other key changes include the new evidence in relation to employment land that is referred to in Section 5 below.
- 3.5 The Secretary of State concluded that the Gateway scheme would have an overall substantial adverse effect on the Green Belt. He stated that a major contributory factor to this was the geographical extent of the Green Belt land that would be affected.
- 3.6 The Inspector considered openness and the purposes of Green Belt in turn. In terms of openness he concluded that the built development parts of the scheme would, following development, no longer have any of the characteristics of openness.

- 3.7 In terms of checking the unrestricted sprawl of large built up areas the Inspector concludes that the Gateway scheme would add to sprawl, but has regard to the scale of the Gateway scheme. He states at para 860:
- “The sheer geographical extent of the proposed development would amount to an element of strategic harm to the Green Belt in this respect”.*
- 3.8 It is relevant to note in relation to this point that the approach to the southern edge of development is proposed to be amended from that promoted in the CWG scheme, please see Plan at Appendix 2.
- 3.9 The Inspector concludes that although there would be no immediate coalescence of development with Baginton, the Gateway scheme would contribute to the merging of Coventry with other settlements thereby conflicting with the purpose of Green Belt to prevent towns from merging. It is relevant to note however, in relation to this point, that the Whitley South scheme has been judged to be acceptable and it is this part of the overall site that directly affects the gap to Baginton.
- 3.10 The Inspector also concluded that the scheme would result in encroachment on the countryside but concludes that the proposal would preserve the setting of nearby conservation areas. In terms of assisting urban regeneration, the Inspector concluded that the overall effect of the Gateway scheme would be to neither demonstrably undermine nor contribute towards its intention. These conclusions remain appropriate.
- 3.11 In terms of beneficial use of Green Belt the Inspector concluded that the Gateway scheme would result in benefits in terms of access to countryside, outdoor sport and recreation, biodiversity and remediation of derelict land. These conclusions also remain appropriate.
- 3.12 Having regard to the views of the Inspector and decision of the Secretary of State in relation to the CWG scheme, it is concluded that the proposal would conflict with 3 of the 5 purposes of Green Belt and have an adverse effect on openness. However in relation to the merging of settlements, it is material to the assessment of the proposed allocation that the Whitley South application has been deemed acceptable.
- 3.13 For the reasons set out elsewhere in this Statement, it is considered that the need to promote sustainable patterns of development, in particular the need to address employment land requirements, represents exceptional circumstances which justify a review of the Green Belt in this location. It is important to note that the evidence in relation to these matters has changed since the Secretary of State’s decision on the CWG scheme.

4.0 ENVIRONMENTAL EFFECTS

Matter 6 question 5

- 4.1 Through both the CWG application and Whitley South application the effects of developing the site have been assessed in detail. Both applications were supported by full Environmental Impact Assessments and detailed consideration of environmental matters were set out by the Secretary of State in his decision on the CWG scheme. This section therefore draws out the conclusions of the Secretary of State noting any relevant changes or updates where necessary, in providing a response to Matter 6 question 5.

Landscape, character and appearance of the area

- 4.2 The site is not covered by any national or local special landscape designations. It lies within Natural England's defined National Character Area of Dunsmore and Feldon. The Dunsmore landscape is generally rural and agricultural in nature, with a distinctive historic character. However, the Inspector concluded (paragraph 879) that:

"Much of the site itself and the immediate vicinity can accurately be described as urban fringe. There are large-scale buildings and infrastructure uses present, as well as the despoiled sewage treatment and landfill parts of the site. The agricultural land within Zones A and B is relatively undistinguished, although the eastern and southern fringes of Zone A alongside the River Avon corridor have a more pastoral farmland character"

- 4.3 The key element in the approach of the scheme towards assimilating the development in the landscape is based on the proposed countryside park. This would run along the river corridor to the east of the site, continuing around the south of Zone A and northwards along the western side of Zone B. Within this area the topography would be altered by the formation of linear bunds of varied heights, profiles and gradients. The bunds would be planted to augment the retained vegetation and provide a screening effect, in addition to the intended recreational and ecological role of the park.

- 4.4 The CWG application was supported by work which assessed the effects of the development on landscape character and visual effects. The assessment work was subject to an independent review undertaken for the Councils. The Inspector concluded in relation to this that (paragraph 883)

"this supports the importance in the baseline position of the presence of a number of significant landscape detractors within and around the site, and endorses the validity of the scheme's landscape strategy and the assessment's conclusions. While objectors suggest to the contrary that the landscape and visual impact of the development would be seriously harmful, my site visits generally confirmed the soundness of the professional assessments"

4.5 In relation to landscape and visual effects the Inspector concluded that (paragraph 884):

“subject to careful control by conditions including on geometry and planting, the bunds themselves would not be unduly prominent. At the same time there would be benefits from the degree of new screening to existing prominent commercial buildings”.

4.6 The Inspector went on to conclude (paragraph 885):

“The scheme would nevertheless introduce a substantial change in the character of much of the site itself, with the replacement of mainly open land by large-scale buildings and associated development. This would be particularly apparent in relation to Zone B by way of exposure to public viewpoints. In having regard to retaining and enhancing landscapes as an aspect of the beneficial use of Green Belt referred to in the NPPF, the landscape impact of such development would not be compatible with the existing characteristic open land quality, despite the current degraded condition of much of the site”.

4.7 It is relevant to note on this matter that the principle of development on the ‘Zone B’ area has now been accepted through the resolution to approve the Whitley South application.

4.8 In terms of lighting, the Inspector concluded that (paragraph 886)

“the introduction of lighting into the developed parts of the site would also be a visual feature of the extension of the built-up area into this. However, the applicant makes a reasonable technical case that, with the use of modern lighting fixtures, the screening of the new and existing development would also limit the visible spread of night-time light including road lighting into the surrounding area”

4.9 Overall the Inspector concluded that (paragraph 887)

“taking the above into account, including that the impact of the scheme would reduce over time and that it would bring some localised benefits, the overall effect of the proposal on Green Belt landscapes and visual amenity can be fairly judged as amounting to a moderate adverse one”.

Heritage Assets

4.10 The main concern in relation to heritage assets is the northern part of the proposed allocation and its effect on the Lunt Fort and conservation areas. The resolution to approve the Whitley South planning application is directly relevant as it demonstrates that the effects have been deemed to be acceptable.

4.11 Nevertheless the conclusions of the Secretary of State on the CWG application are also relevant. He concluded at paragraph 18 that

“that the overall degree of harm to the significance of Lunt Ford would be slight and *certainly less than substantial; and that the concerns of English Heritage appear to be addressed in the final version of the proposal (IR895). For the reasons in IR896-899, he agrees with the Inspector that no material harm has been established with respect to the effect on Conservation Areas, the settings of which would be preserved (IR1096). He also agrees that there is no evidence to suggest that there would be a material impact on any other designated or undesignated heritage assets (IR899)*”.

Biodiversity

4.12 The CWG Inspector stated that “*it can be accepted that there is a sufficiently full understanding of the ecological interest of the site*” (paragraph 902). Given that there have been no material changes to the condition of the site since the CWG decision it is considered that the conclusions of the Secretary of State and Inspector remain directly relevant.

4.13 The Inspector went on to state that
“*The proposal would result in a number of potentially harmful impacts on biodiversity when its effects are considered prior to taking any mitigation or compensation into account*” (paragraph 903)

and then to conclude that:

“*the proposed mitigation and compensation would adequately deal with the harmful effects of the development, other than on veteran trees, but this does not negate the need for the development to be justified on the basis that the harm it would cause to biodiversity cannot be avoided*” (paragraph 911).

4.14 However, notwithstanding this, it should be noted that the biodiversity offsetting metric employed in tandem with the scheme has ensured that the biodiversity of the site will be retained and enhanced in the long term and although there is a loss of veteran trees, this resource is not scarce within the wider area with areas such as Stoneleigh Deer Park supporting a notable resource.

Transport

4.15 The CWG application, and indeed the Whitley South application include significant works to the local highway network together with measures to ensure that the proposals are accessible and sustainable. These are detailed in the application descriptions attached at Appendix One and Three. The effects of the allocation on transport matters are appropriately summed up by the Secretary of State at paragraphs 20 to 22 of his decision letter on the CWG scheme. These conclusions are considered to remain appropriate and indeed have been reinforced by the resolution to approve the Whitley South scheme.

“*The Secretary of State agrees with the Inspector that the site is strategically well positioned in transport terms; and with his conclusion (IR917) that the proposed*

measures could be reasonably relied upon to significantly improve public transport accessibility. However, he also agrees with the Inspector that car journeys would be substantially increased, and that it is not certain that the 65% single driver share or the 10% walking and cycling targets would be achieved (IR917). Nevertheless, he agrees with the Inspector that, overall, the location of the site could be made sustainable to the required level in terms of accessibility by modes other than the car (IR917)”.

“The Secretary of State agrees with the Inspector that the residual cumulative impacts of the proposed development in highways terms would not be severe (IR923); and that generally the proposal would comply with policies in the WDLP and the CDP that seek satisfactory access and accessibility, safety, and movement infrastructure provision (IR923). However, for the reasons in IR924, he agrees with the Inspector that there would be some conflict with WDLP Policy RAP10 in relation to the effect on Bubbenhall Road, to be taken into the overall balance (IR924)”.

“The Secretary of State agrees with the Inspector that the proposed improved public transport connections from the site to the centre of Coventry would also benefit other employment sites in the vicinity, including Whitley Business Park/Jaguar, providing a significant wider transport gain from the proposal (IR925). However, for the reasons in IR927-928, he also agrees that the wider potential beneficial effect on the highway network carries only limited weight”.

- 4.16 It is also important to note here that key elements of the off-site highway works have already been completed (i.e. the Whitley Junction). Other elements are subject to a resolution to grant planning permission under the Whitley South scheme (e.g. the new junction on the A45). The Section 106 is currently being finalised and the planning permission will be issued shortly.

Other Issues

- 4.17 In terms of other environmental matters the Secretary of State’s conclusions at paragraphs 23 and 26 of his decision letter remain valid.

- 4.18 In relation to flood risk, the Secretary of State concludes that:

“The Secretary of State notes (IR941) that part of the embankment structure for the new bridge across the River Sowe would be in Flood Zone 3 (high probability of flooding); and he agrees that whether or not this is acceptable depends on the acceptability of the scheme as a whole. However, he also notes that the additional flood compensation storage provided would deliver a net benefit in drainage terms (IR942); and that there is no objection from the Environment Agency or Severn Trent”.

- 4.19 In relation to other matters he concludes

“For the reasons in IR929-932, the Secretary of State agrees with the Inspector that *the development would deal satisfactorily with **site contamination** (IR933); and he agrees with the Inspector that, in terms of **noise**, the development would not have a significant adverse effect on amenity (IR936). On **air quality**, he agrees with the Inspector that there is no evidence to support contentions that the applicant’s analysis of the effect of the development is inadequate or would have an unacceptable impact (IR940); and, for the reasons in IR947-950, he also agrees that no material harm has been established with respect to **public safety** in connection with the operation of Coventry Airport (IR1096). Overall, the Secretary of State agrees with the Inspector at IR1018-1023 that, subject to the caveats set out therein, it can be concluded that the proposal would be reasonably consistent with sustainable development objective”.*

- 4.20 The Secretary of State’s conclusions in relation to the quality and validity of the Environmental Statement submitted with the CWG application is also relevant. He concluded at paragraph 8 that:

“The Secretary of State agrees with the Inspector that the environmental information - comprising the original Environmental Statement and the supplements subsequently submitted, together with the information provided for the purposes of the Inquiry and comments from statutory consultees – meets the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 and is not defective such that it should prevent the granting of planning permission (IR1077)”.

5.0 EMPLOYMENT LAND NEED

Matter 6 questions 6 and 7

- 5.1 The conclusions of the Secretary of State in the CWG decision where detailed consideration was given to these matters, are again relevant. However it is important that these conclusions are reviewed in the context of the updated evidence and changes since the decision was made, as explained in Section two.

Evidence at the time of the CWG Inquiry

- 5.2 The employment need evidence available at the CWG Inquiry included work undertaken by Savills on behalf of the applicants, work undertaken by G L Hearn on behalf of the Authorities and work undertaken by Atkins on behalf of the LEP. The LEP's position as set out in its Strategic Economic Plan was also material.

The Inspector's and Secretary of State's conclusions

- 5.3 The Secretary of State concluded that *"a strong case has been made for the type of accommodation which would be provided in Zone A and that both this and the Zone B component would be well suited to the economy of the LEP area, bringing important economic benefits"* (paragraph 25).

- 5.4 In relation to Zone A the Inspector concluded that (paragraph 978)

"overall the market evidence with respect to Zone A indicates a strong likelihood of future supply inadequacies for large scale B2/B8 premises with difficulties in meeting the largest space requirements in the vicinity of Coventry".

"An unmet need would be likely to lead to investment going elsewhere, or latent demand not being unlocked".

- 5.5 In terms of the Zone B area, the Inspector concluded that:

"there is clear market evidence of a limited future supply of good quality full-range B1 land in the Coventry area. In addition the Zone B proposal is avowedly aspirational in that it seeks to provide for a market segment that is not currently well served" (paragraph 984)

and

"although Ansty in particular appears to be a potential competitor, there is no evidence that the Zone B proposal would be detrimental to the successful development of other sites" (paragraph 984)

- 5.6 However, both the Inspector and the Secretary of State identified a deficiency in the evidence base in relation to quantitative need for the proposal. The Inspector stated:

“there is no development plan basis for the extent of employment land required beyond local employment needs. There is therefore a deficiency in terms of an up-to-date quantitative basis for future land requirements in the sectors targeted by Zone A other than as derived from take-up rates. The scale of Zone A proposal has not been specifically justified in this respect” (paragraph 980)

and

“there is again no specific justification for the scale of the Zone B proposal in terms of the quantitative extent of employment land required in the LEP area based on an up-to-date assessment” (paragraph 984).

- 5.7 This deficiency in the evidence base was important in the balance of the SoS’s decision. He concluded that a strong, but not compelling case had been made out.

“However, overall, while he agrees with the Inspector’s conclusion at IR1009 that, although a strong case has been made for the type of accommodation which would be provided in Zone A and that both this and the Zone B component would be well suited to the economy of the LEP area, bringing important economic benefits, he agrees that on the basis of the evidence available to the Inspector and in subsequent correspondence, a compelling case has not been made out. The SoS agrees with the Inspector that the scale of development proposed has not been fully justified in terms of the quantitative position needed to meet forecast future employment land requirements” (paragraph 25).

- 5.8 This shortcoming, coupled with the anticipated speed at which the Local Plan would be put in place, were crucial to the ultimate decision of the Secretary of State.

*“The Secretary of State agrees with the Inspector that the Green Belt balancing exercise is a matter of judgment on which different views can legitimately be reached (IR1097). Having carefully considered the Inspector’s analysis and comments at IR1098, the Secretary of State agrees that a strong case has been made in favour of the development; that it would deliver economic benefits and environmental gains, with some other supporting factors; and that it would be reasonably consistent with sustainable development objectives. However, he also agrees with the Inspector that it would give rise to substantial Green Belt harm, which should be accorded very serious weight given the importance attached to Green Belts, together with some other harm. He has also had regard to the Inspector’s conclusion that there is a shortcoming in evidence to support the scale of the proposal (IR1098). The Secretary of State considers that the Employment Land Study addresses some of these shortcomings, but fails to establish that the need for the proposed development is such that a decision on the future of the Green Belt at the application site **should be taken now rather than as part of a wider consideration of Green Belt boundaries through the Local Plan process**” (paragraph 32).*

[Our emphasis]

Updated evidence and changes since the Secretary of State's decision

- 5.9 Since the Coventry and Warwickshire Gateway decision, new evidence has emerged. This includes the following:
- Coventry & Warwickshire Employment Land Use Study, CBRE, August 2015 (ref ECO7PM)
 - West Midlands Strategic Employment Sites Study, PBA & JLL, September 2015 (ref EXAM 42)
 - Coventry Employment Land Study, GL Hearn, December 2015 (ref EXAM 43).
- 5.10 This represents a material change since the SoS's decision. In addition the Coventry & Warwickshire authorities have agreed a Memorandum of Understanding (MOU) on employment land provision (ref EXAM 44).
- 5.11 The West Midlands Strategic Sites Study, prepared through joint working of local authorities across the region, outlines that there has been a long and successful history of collective working in the West Midlands in dealing with strategic employment land matters. It outlines that planning should provide at least a 15-year supply of industrial land that is immediately available ('deliverable') or have a reasonable prospect of coming forward within the period. Supply across the West Midlands falls short of this. Within the region it identifies that demand for large-scale logistics space is greatest along the M42 on the western side of Birmingham and around Coventry and Rugby (Areas A and B, Figure 4.10). This reflects the central UK location, motorway network, and clusters of automotive and aerospace activity. The Study indicates that within the areas of demand, strategic industrial sites will almost inevitably have to be within the Green Belt.
- 5.12 The Coventry and Warwickshire LEP has commissioned a comprehensive and updated Employment Land Study¹, with a specific part of the brief to address the deficiencies in evidence identified by the SoS and Inspector in the CWG decision. The report, prepared by CBRE, presents clear evidence of quantitative need for new employment floorspace in the LEP area including a level of need which demonstrates a compelling case for the scale of development proposed under Policy DS16.
- 5.13 The CBRE Employment Land Study was published in August 2015 (ref ECO7PM). It undertakes an assessment of employment land requirements following the approach set out in the National Planning Practice Guidance.
- 5.14 The Study reports that take-up in 2014 was exceptionally high, with levels that exceed the pre-recession peak and it notes that market signals indicate that the strength of take-up is likely to continue into the future. It identifies that growth has been strong across all the main components of employment land demand in the CWLEP area – in advanced manufacturing, particularly the automotive sector, and in logistics as part of the 'Golden Triangle.' This encompasses B1b/c, B2 and B8 use classes.

¹ This updates and supersedes the 2014 Atkins Study

- 5.15 It reports take-up since the CWG decision, at Ryton and at Ansty which means that both of these sites are almost complete with only a small number of plots remaining. It emphasises the importance of the automotive sector to the LEP area, with significant recent investments from JLR, Aston Martin, LTC and BMW Mini.
- 5.16 It concludes that land supply is at a critically low level, with just 1.3 years supply of land available across the LEP area, much of it in smaller, ageing and unsuitable units. CBRE recognise in their report that this void is constraining growth. It identifies strong recent take-up on high quality sites and clearly outlines that the supply on these sites are now close to being exhausted, and future growth will be constrained unless currently proposed sites (which includes DS16) are delivered and future sites identified. They point to a shortage of suitable stock already driving substantial growth in rents.
- 5.17 CBRE undertook projections of future demands based on sectorial trends (requiring 353 ha), demographic trends (requiring 405 to 570 ha) and past take-up (requiring 637 to 660 ha) [see their conclusion and review of findings page 56]. They also undertook a detailed assessment of market conditions and trends to inform their recommendations and concluded that these indicate a need for local authorities in the area to plan for the higher end of the employment land ranges identified (page 48), concluding that provision of between 500 – 660 hectares would be appropriate.
- 5.18 As set out in the Employment Land MOU (ref EXAM 44), the total need derived from detailed employment land studies is higher still at 714 ha, 2011-31.
- 5.19 CBRE conclude that supply is limited to 64 ha of deliverable / ‘oven ready’ sites with capacity for B2/B8 development. However this is spread across seven separate sites, providing very limited opportunities for a large B8 occupier. CBRE identify a further potential supply of 93ha on secondary sites with infrastructure or other constraints (page 54 and page 56). In quantitative terms, there is thus **a quantitative supply shortfall of at least 155 – 469 ha of land for B2/ B8 development across the LEP area.**
- 5.20 The CBRE study goes on to indicate that even with the delivery of the proposed Coventry and Warwickshire Gateway site and the proposed extension to Bermuda Park (in Nuneaton & Bedworth District) that would increase supply to only around 330 ha which is at the bottom end of the requirement range (bullets 5 and 6 page 56). They therefore advise that other land, in addition to the potential CWG site and Bermuda Park site, is identified and brought forward.
- 5.21 They conclude by saying that growth in the area will be constrained if the proposed sites (at CWG and Bermuda) are not delivered and further sites identified (bullet 7 page 56).
- 5.22 The LEP’s position remains unequivocal. Their Strategic Economic Plan states:

“The availability of employment sites is fundamental to improving the competitive edge of Coventry and Warwickshire and to attract new investors and retain local

businesses in support of our key economic sectors and wider business growth” [para 2.3.4].

- 5.23 Accordingly, Section 4.4.3.1 of the Strategy sets out the particular importance of having in place the right infrastructure and the right employment sites to respond to the needs of the market and the need to ensure that planning works proactively to deliver these necessary sites. Ensuring the availability of priority employment sites is set out as a key element of the LEP’s growth focus. Principal among these sites is the Coventry and Warwickshire Gateway site. It is identified in the SEP as a priority employment site.
- 5.24 In addition to a quantitative shortfall in employment land provision at a LEP level, there is now evidence of a significant unmet employment land need in Coventry.
- 5.25 The submitted Coventry City Local Plan recognises the importance of working closely with neighbouring authorities if the projected growth needs of the City are to be met. It refers to the CBRE Employment Land Study and work undertaken by G L Hearn to identify the City’s total employment land requirements and the potential supply of land within the City to meet those requirements.
- 5.26 The Coventry Employment Land Review 2015 (ref EXAM 43) identifies a need for 215 hectares of employment land over the 2011-31 period. In addition Coventry’s Local Plan identifies a requirement for 154 ha to support loss of employment land to alternative uses enhance the quality of the employment offer. A total requirement for 369 ha of B-class employment land is therefore identified in the Submitted Plan. The plan is explicit that taking account of the current supply pipeline and proposed allocations for new employment land there *“is an identified shortfall of 241ha which is to be provided within Warwickshire but adjacent to the City boundary, principally at Ansty Park, Ryton and Coventry Gateway”* (page 16).
- 5.27 Further specific reference and support is given to the development of the ‘Coventry Gateway’ site within sections 1 and 3 of the Plan. Having regard to the evidence base and the imbalance between projected growth in jobs (18,100) and working age population (47,600), the Plan states that this
- “justifies the need to focus new employment provision on and immediately around the City. This is an element of the DtC that is well established with the City’s Warwickshire neighbours and has resulted in schemes such as Ansty Park and Coventry Gateway being brought forward and proposed”* (page 16 and 17).
- 5.28 The Coventry and Warwickshire authorities have worked together through the duty to cooperate to agree a distribution of employment land requirements to address the shortfall in supply within Coventry City. This sub-regional employment site (DS16) is specifically identified as meeting Coventry’s unmet need within the MOU.
- 5.29 The resolution to approve the Whitley South application is also highly material together with the commitment by JLR to acquire a significant amount of space on the site together with their expansion onto the remaining land at Whitley Business Park.

- 5.30 The evidence base demonstrates a clear quantitative need for a site of sub-regional significance to meet the needs of the area. This need is over and above the 'local needs' identified and addressed through Policy DS8. Furthermore, the delivery of the land around Coventry Airport will help to address the unmet needs arising from Coventry City, whose Local Plan is currently being examined and progress on that Plan is a material change since the Secretary of State's decision on the CWG application.

Conclusions

- 5.31 There is clear and compelling evidence to demonstrate a quantitative and qualitative need for the allocation of land at and around Coventry Airport. The site is needed to meet sub-regional needs, including unmet needs arising in Coventry City. In this regard it is needed to ensure that both the Coventry and Warwick Local Plans are sound.

6.0 JOB CREATION

Matter 6 questions 8 and 10

6.1 An estimate of the likely number of jobs created at the sub-regional site was undertaken for the CWG application by a number of different parties utilising the HCA Employment Densities Guide 2010. This included an independent assessment carried out by GL Hearn on behalf of the local planning authorities which formed the basis of the Inspector's conclusions on this matter.

6.2 A number of different figures were presented based on slightly different assumptions on the average densities and land use mix to be applied. Similarly, slightly different assumptions were applied to the displacement rates (Matter 6 question 10). The Inspector's conclusions on the matter are set out in paragraph 993 of his report. He concluded

“There is no dispute that the number of jobs that would be provided within the development cannot be certain, especially given the absence of specified occupiers and the likely long timescale of implementation. A figure of up to 7,800 jobs is agreed by the applicant and Councils as being the likely number that would be generated. The calculation of this figure uses the standard approach of applying HCA job density methodology, which is based on reasonable assumptions. The potential number of warehouse jobs in Zone A appears to be the main area of contention, but even applying probability as advocated by The Community Group does not produce markedly dissimilar estimates of the most likely number. Displacement could be higher than 25%, but the likelihood is that, assuming a high occupancy of the development, a substantial number of jobs in the order of several thousand and possibly up to 7,800 would be created. This carries significant weight”.

6.3 This position remains directly relevant. Furthermore, the commitment of JLR to take space at the Whitley South site provides added certainty on the scale and quality of jobs that will be created.

7.0 ALTERNATIVE SITES

Matter 6 questions 9 and 12

- 7.1 The Secretary of State considered the availability of alternative sites to meet the demands of the area. He concluded that:

“although no suitable alternative sites were put to the Inspector, the merit and details of any potential review of the Green Belt boundaries are a matter for the development Plan process” (paragraph 31).

- 7.2 Given the locational attributes of the CWG site, it is agreed that the same scale of economic benefits could not be achieved from development elsewhere.

- 7.3 Section 5 of this Statement sets out the evidence which demonstrates a need for a sub-regional site to be brought forward and outlines why the CWG has been identified as a suitable and high quality site.

- 7.4 There is a clear quantitative shortfall of employment land, in particular with an unmet need / shortfall of 241 ha of employment land arising from Coventry (2011-31). In addition the PBA/ JLL West Midlands Strategic Employment Sites Study identifies a shortfall in supply of strategic industrial sites across the West Midlands; and the CBRE Study identifies a quantitative shortfall in supply across the LEP area.

- 7.5. Fundamentally there is therefore a need to bring forward additional supply, over and above existing sites (and in addition to the CWG site).

- 7.6. CBRE conclude that supply is limited to 64 ha of deliverable/ ‘oven ready’ sites with capacity for B2/B8 development. However this is spread across seven separate sites, providing very limited opportunities for a large B8 occupier.

- 7.7 Concern has been raised in relation to the competition the site may introduce to the detriment of existing employment sites. Particularly at Ryton and Ansty. The Inspector for the CWG application concluded that:

“although Ansty in particular appears to be a potential competitor, there is no evidence that the Zone B proposal would be an alternative to the successful development of other sites” (paragraph 984).

- 7.8. The supply of available land has diminished significantly since the CWG Inquiry. At the point of the Inquiry, there was 18.5 ha of land available at Ryton, 23 ha at Ansty Park and 31 ha at Rugby Gateway. This has reduced to 10 ha at Ryton and Rugby Gateway respectively and 4 ha at Ansty Park at the time of preparation of the CBRE Study. Recent take-up at these sites has been considerable and provides a clear market signal in respect of demand for good quality employment land provision.

- 7.9. There is now effectively no remaining supply at Rugby Gateway, with two speculative buildings of 180,000 sq.ft and 290,000 sq.ft under construction which will complete the scheme. This 48 ha site will have been developed in just 2 years.
- 7.10. Just 4 ha (from 40ha) remains available at Ansty Park with potential for a building of 120,000 sq.ft and a further building of 100,000 sq.ft or two buildings of 40 – 50,000 sq.ft. At Ryton two buildings (141,000 sq.ft and 327,000 sq.ft) are under construction but have been taken prior to practical completion by Jaguar Land Rover; with just one 10 ha plot remaining.
- 7.11. The CBRE report identifies the need for a significant amount of additional employment land and the potential need for other strategic sites of sub-regional significance in addition to the CWG site. The CBRE report together with the conclusions of the LEP's Strategic Economic Plan emphasises that, of the sites considered, the CWG site performs extremely well and is the most suitable location for a site of sub-regional significance.
- 7.12. The majority of additional sites which could be brought forward – including Hams Hall and Bermuda Park Extensions – also fall within the Green Belt.
- 7.13. It is considered that the CWG site is essential in order for there to be an appropriate range and choice of employment sites, in both Warwick and the sub-region. This will help to ensure potential occupiers and investors have a choice of sites, both in terms of quality, location and cost, as well as ensuring that continuity of supply is maintained; and that economic growth within the LEP area is not frustrated.

8.0 OTHER POTENTIAL BENEFITS

Matter 6 question 11

- 8.1 It is considered that the allocation proposal has the potential to deliver a range of other economic and environmental benefits. The extent of these benefits was a matter considered by the Secretary of State and Inspector in the CWG decision.
- 8.2 As outlined above and explained in the description of the development, it is proposed that the CWG scheme will incorporate a significant area of land for managed open space. This area will include ground remodelling to help screen the development, but will then enable significant new planting, public access, including formal footpath, cycle and equestrian routes, together with the creation of areas for biodiversity enhancement. Currently the area has no public access and although there are areas of biodiversity, this is predominantly located in and around the former sewage treatment works where remediation is required in any event.
- 8.3 The Secretary of State acknowledged that the proposal would deliver benefits in terms of the creation of the Countryside Park and the resulting access to the countryside and improvement to recreation facilities. He also recognised the benefits to biodiversity (paragraph 15).
- 8.4 The proposals will also bring about the reclamation of significant areas of contaminated ground. The land remediation was also identified by the Secretary of State as a benefit of the proposal (paragraph 15).
- 8.5 The proposed improvements to the highway network together with a package of sustainable transport measures were identified by the Secretary of State as significant benefits. He concluded at paragraph 30 that:
- “significant weight can be accorded to the improved public transport connections put forward with the scheme and limited positive weight to the traffic benefit”.*
- 8.6 The Inspector acknowledged the economic benefits of the proposals in addition to job creation and addressing employment land needs. These were the potential to generate over £44m in increased productivity or economic output, around 900 construction jobs per year, a build cost of £250m and business rate retention for Warwick Council of £1.7m per year. Whilst these figures are now slightly out of date they provide a general understanding of the level and breadth of potential economic benefits.
- 8.7 The Whitley South application, with JLR’s commitment to expand in the area, is a further major economic benefit of the allocation. The Whitley South scheme is directly linked to the expansion of JLR at its existing Whitley site. These are important direct and directly associated benefits which arise from the Whitley South scheme.

8.8 Overall the Secretary of State in the CWG application concluded that the scheme:

“would deliver economic benefits and environmental gains and would be reasonably consistent with sustainable development objectives” (paragraph 36).

9.0 VIABILITY AND DELIVERABILITY

Matter 6 question 13

- 9.1 It is considered that the proposal is viable and deliverable. This is evidenced by the commitment of the promoters through the CWG application and through the Whitley South application and the commitment of JLR.
- 9.2 The scheme is significant in its scale and will require substantial investment in terms of remediation, particularly on and around the sewage works, and infrastructure investment, particularly in terms of highway improvements. The promoters have undertaken extensive investigation into the works required to develop the site and provide serviced plots. The promoter is an experienced developer and confident that these works can be undertaken to ensure the scheme is deliverable and viable.
- 9.3 The developer has provided statement in Appendix Four regarding their ability to deliver the scheme.
- 9.4 Evidence was presented to the CWG Inquiry on this matter and the Inspector's conclusions are relevant. He concluded that:
- “while the identity of an applicant is not usually material to determination of an application, the information available on the experience of the developer team in this case does not lead to any serious doubt that the judgement made on viability is unsound”* (paragraph 997).
- 9.5 The Inspector also considered the risk of a scheme remaining partially developed, and concluded that:
- “However, the imposition of appropriate conditions and obligations relating to phasing and infrastructure provision,.....would provide reasonable safeguards against The Community Group's postulated scenario of project failure”* (paragraph 1000).
- 9.6 Further comfort that the scheme is viable and deliverable can be derived from the fact that key elements of the off-site highway works have been completed (the Whitley Junction) or are the subject of a resolution to grant planning permission under the Whitley South scheme (e.g. the new junction on the A45).

10.0 EXCEPTIONAL CIRCUMSTANCES

Matter 6 question 14

- 10.1 The various court cases that have considered this issue dictate that something must have changed since the original Green Belt boundary was drawn to justify a revision to the boundary. In the case of the Gateway site it is considered that there have been fundamental changes in circumstances that justify a revision. This includes the compelling economic need that has been identified now which could not have been known at the time that the existing Green Belt boundary was set. Coupled with this is the current severe lack of supply of suitable sites to meet this need. Another key change of circumstances is the greater imperative that has been given to achieving sustainable development in planning law and national planning policy (Section 39 of the Planning and Compulsory Purchase Act 2004 and Paragraph 84 of the NPPF). The consideration of Green Belt boundaries must now be undertaken in the context of this requirement to promote sustainable development.
- 10.2 Employment Land supply in the area is at a critically low level. A number of different Employment Land Reports have identified the problem and advocated the allocation of additional land including sites of sub-regional significance. The most recent report from CBRE identifies the need for a very significant amount of additional employment land, including the specific allocation of the CWG site.
- 10.3 Work by G L Hearn on behalf of Coventry City Council identifies a significant unmet local need arising in Coventry that will need to be met in an adjoining authority area.
- 10.4 The LEP's Strategic Economic Plan is committed to bringing about the economic growth of the Coventry and Warwickshire area. It recognises the need for additional land to be brought forward and identifies the CWG site as a priority employment site. The NPPF places great importance on local planning authorities working with LEPs.
- 10.5 The various Employment Land Studies undertaken included a review of potential sites. Their considerations are consistent, that the CWG is the most appropriate and best located site to meet the needs of the sub-region. It is highly accessible, located on the key north south corridor connecting the M6 with the M40. It has prominence close to established employment locations, including JLR. It is also well related to Coventry, where significant needs arise and where a significant employment base exists.
- 10.6 The economic evidence is compelling and provides the overriding exceptional circumstances for the site to be allocated and an alteration to the Green Belt made.
- 10.7 The site is however also capable of accommodating development in a highly sensitive and sustainable way ensuring that impacts are properly mitigated and acceptable and benefits are maximised. The conclusions reached on these matters by the Secretary of State in the CWG application are clear.

- 10.8 The Secretary of State concluded that the CWG scheme was acceptable in terms of heritage, landscape, flood risk, noise, air and public safety considerations. He also found the scheme would deliver benefits in terms of the country park and access to the countryside and recreation, to biodiversity and site contamination. He also concluded that the scheme would be acceptable in transport terms and deliver benefits overall to sustainable transport.
- 10.9 The suitability of the site for development together with these potential additional benefits also contribute towards the exceptional circumstance required to justify the allocation and a change to the Green Belt.
- 10.10 The resolution to approve the Whitley South scheme and the commitment of Jaguar Land Rover is also a new and material matter which contributes significantly to the exceptional circumstances. This will permit development on part of the allocation site.
- 10.11 The Secretary of State's decision on the CWG application was a finely balanced one. He concluded that a strong case had been made and that the scheme would deliver economic benefits and environmental gains, with some other supporting factors and that it would be reasonably consistent with sustainable development objectives.
- 10.12 The Secretary of State raised concerns however that the Employment Land evidence at the time
- “failed to establish that the need for the proposed development is such that a decision on the Green Belt at the application site should be taken now rather than as part of a wider consideration of Green Belt boundaries through the Local Plan process”.*
- 10.13 These shortcomings have now been addressed both through the completion of additional Employment Land work (CBRE study, PBA / JLL study and GL Hearn Coventry Employment Land Study), but also through the Green Belt review process undertaken as part of the Local Plan. It is evident that there have been further reductions in supply since the Secretary of State's decision. It is critical too, that the test to be applied now is materially different to that which the Secretary of State applied to the application. The Government has made clear that decisions on Green Belt should be made through Local Plans and although the application decision was finely balanced it did not consider that very special circumstances had been demonstrated sufficiently to outweigh the harm, at the time of the CWG application.
- 10.14 It is important to note here that the Secretary of State's decision was made in the expectation that the new local plan would proceed to adoption within a relatively short timeframe of the CWG decision. In that context his overall conclusion was based on the evidence at the time being insufficient to justify a decision on the Green Belt on this site being taken in advance of the Local Plan review.

Scheme change

- 10.15 In conclusion on this issue, it is considered that there have been significant changes in circumstances since the time that the application site was designated as Green Belt that

indicate that a review of the Green Belt boundary would be appropriate. This includes the compelling economic need that has been identified coupled with the lack of suitable alternative sites. In addition, the allocation of this site for the proposed development rather than a non-Green Belt site would be more sustainable given the close proximity to the largest pool of potential employees in the sub-region (thus limiting journey to work distances) and the opportunities to provide high quality public transport links (as demonstrated in the CWG application). Furthermore, this site is in close proximity to the areas of the sub-region where unemployment levels are the highest, with sites outside of the Green Belt being remote from such areas. As a result, this Green Belt site is better placed to contribute towards sustainable development than non-Green Belt sites and with the introduction of Section 39 of the 2004 and Paragraph 84 of the NPPF since the current Green Belt boundary was drawn this represents a significant change in circumstances that weighs in favour of reviewing the Green Belt boundaries in this location. To do otherwise would conflict with the objective of achieving sustainable development. This all amounts to exceptional circumstances sufficient to justify taking this site out of the Green Belt.

APPENDICES

APPENDIX ONE (CWG application)

Description of Development

Parameters Plan

Illustrative Masterplan

COVENTRY AND WARWICKSHIRE GATEWAY APPLICATION

The Application is described as:

Comprehensive redevelopment of land to the north and south of the A45 between the Stonebridge and Tollbar Island junctions of the A45 and A46 and land to the north, west and south of Coventry Airport comprising demolition of existing structures and the erection of new buildings to accommodate offices, research & development facilities and light industrial uses (Use Class B1), general industrial uses (Use Class B2), storage and distribution (Use Class B8), hotel accommodation (Use Class C1), car showroom accommodation, replacement airport buildings, small scale retail and catering establishments (Use Classes A1, A3, A4 and/or A5), new countryside park, ground modelling work including the construction of landscaped bunds, construction of new roads/footpaths/cycle routes, remodelling of junctions on the existing highway network, associated parking, servicing and landscaping.

The detailed description of the development proposals are:

Zone A: Logistics Park

- Demolition of existing structures (see existing land use plan);
- The remediation of the land at and around the former sewage treatment works and former land fill sites;
- Ground modelling including the creation of development plateaux and landscape bunds;
- The development of up to 343,740 sqm of B2/B8 floorspace, of which the B2 floorspace will be up to 104,000 sqm;
- Associated access, parking, servicing, infrastructure and landscaping;
- Strategic landscaping including the creation of publicly accessible open space in a Countryside Park;
- The relocation of the Railway Museum (from land adjacent to Rowley Road to land in Zone A).

Zone B: Technology Hub

- Demolition of existing structures (see existing land use plan);
- The remediation of former landfill areas together with ground modelling including the creation of development plateaux and landscape bunds;
- The development of up to 83,594 sqm of mixed B1 buildings intended primarily for Automotive, Aerospace and Digital Technologies; Hotel(s), Use Class C1; Retail unit(s), Use Class A1, A3, A4 and A5; and car showroom(s), comprising:
 - Up to 65,032 sq m of B1 primarily B1b/B1c space
 - Up to 4,645 sq m of car showroom space
 - Up to 2,300 sq m of ancillary A1, A3, A4, A5 floorspace

- Up to 11,617 sq m of C1 floorspace.
- Associated access, parking, servicing, infrastructure and landscaping;
- Strategic landscaping including the creation of publicly accessible open space in a Countryside Park.

Zone C: Highway Works

- New highway works comprising:
 - (i) Works to A45/A46 including a new bridge over the A45
 - (ii) Works north of A45
 - (iii) Works to access the development south of A45

Note: These works are submitted for approval now. Associated works to off-site highway junctions are also proposed as part of the application.

- These comprise:
 - A46/A428 Binley Island
 - A45/B4113 St Martin's Roundabout
 - A46 Stoneleigh Road Junction
 - A4082/B4110 'Asda' Roundabout
 - A46/B4082 Walsgrove Roundabout.

Zone D: Replacement Airport Buildings

- Demolition of existing hangars/office block on the Airport;
- Replacement of hangars, office buildings and fuel storage;
- Associated access and infrastructure works.

Note: Details of the replacement airport buildings are submitted for approval now.

The detailed description of development for Zones A and B includes proposals for the split of development between the various B Class uses. This has been used to guide the Environmental Impact Assessment and in this regard, planning conditions could be used to ensure that the scheme is developed in accordance with the land use mix envisaged and in accordance with the mix of uses assessed in the EIA.

The application site totals approximately 308 ha. This can be broken down having regard to the Parameters Plan, as follows:

- Zone A development plot - 88 ha

- Zone A landscape - 86 ha
- Zone B development plot - 33.6 ha
- Zone B landscape - 30 ha
- Zone C highways (i-iii) - 70 ha
- Zone D Airport - 2.8 ha

Development Vision

The vision for the Gateway is one of a sustainable flagship development of strategic significance, with a clear sense of place and a strong emphasis on landscaping and biodiversity. It is intended that the development will embrace the latest techniques in design and construction and will be planned and designed to the highest standards. The overarching aims of the proposed development are to:

- Create a development of regional importance with benefits to reflect the scale and significance of the proposal;
- Meet the needs of high value growth businesses and attract inward investment to strengthen the local economy and provide new jobs for local people;
- Satisfy the economic, social and environmental criteria established by Government guidelines;
- Provide significant transport improvements and fully integrate the proposal with the wider area, particularly through public transport;
- Promote and implement high standards of design at all scales, from the overall composition and layout of development to the detailing of buildings, structures and the landscape;
- Respect the character and qualities of the existing environment, minimise any potential adverse environmental effects and establish an extensive area of publicly accessible open spaces.

Infrastructure

The following package of highway works are proposed. These are shown in detail on the application plans.

- (i) Construction of a new grade-separated junction onto the A45 Stonebridge Highway to serve the Coventry and Warwickshire Gateway site, the Jaguar Headquarters and Whitley Business Park development;
- (ii) Construction of a new link-road through Jaguar Whitley to the A444, where the interchange with Leaf Lane will be replaced with an “all movements” junction, including a new bridge. The existing north- bound slip road will be divided into two at the junction, to resolve current highway safety issues;
- (iii) Closure of the current Airport access onto Stoneleigh Road south of Baginton;
- (iv) Restriction (by financial penalty) of access for ‘Gateway’ generated traffic along Rowley Road through Baginton; all existing highway users continue without change;

- (v) Closure of Bubbenhall Road around the southern edge of the Airport. A replacement combined emergency and non-vehicular access onto the Bubbenhall Road to the south-west will be provided and constructed to allow personalised car access for Bubbenhall village nominees and other service vehicles who currently use this route, via a “Smartcard barrier”;
- (vi) A new access road to serve the Logistics Park. The new access road will require the demolition of airport buildings and their replacement elsewhere on the airport site;
- (vii) Improvement to:
 - A46/A428 Binley Road Roundabout;
 - A45/A46 Stonebridge (Festival) Island;
 - A46 Stoneleigh Road Junction, (Warwick University) including approach widening and removal of the Stoneleigh Road Dalehouse Road Roundabout;
 - A45 St.Martin’s Island;
 - A444 Whitley Roundabout.

Remediation

The development plot areas are divided into:

- Zone A - Industrial and logistics uses, on a mix of agricultural land, two existing licensed waste tips, an existing HGV yard, and a large Severn Trent sewage treatment works. This area is the main focus of contamination within the scheme.
- Zone B - Technology Park uses, largely on agricultural land with no known issues, but with some areas (existing railway museum, rugby club and model car club) that may have some isolated hydrocarbon issues from oils.

Historically the Zone A area has been used for activities that can be a risk to the environment. These activities included disposal of council collected waste and a sewage works. The historic activities produced material that is a potential risk to water in the ground, the adjacent river, people, wildlife and vegetation.

The proposed re-development clean-up of the site will involve the excavation of all the historic material which will be separated into different types which will then be treated in a different way using well established and understood techniques so that it no longer presents a risk to the environment. All works will comply with the requirements of the Environment Agency and the Local Environmental Health Officer. The treatment techniques will include the following options:

- Screening of soils to separate topsoils, suitable soils and to remove biodegradable material e.g. sewage;
- Screening of soils to remove plastics and metals and removal of these from site;
- Treatment of oil contaminated material by (bioremediation) using natural soil microbes which effectively digest oil substance;
- Dewatering of poor quality materials from sewage sludge beds;

- Stabilising of poor quality soil materials, using lime, pfa, cement mixes to help lock materials into these soils to allow them to be used in the development works.

The proposed development earthworks volume is approximately 4 million m³. The average excavation on site will be 3m deep, with localised deeper sections to expose all existing materials. The development aim is to use much of this material on site within the development.

- Approximately 1 million m³ will be placed in a screening bund around the site to help mitigate any noise, light or visual impacts of buildings and operations on site.
- Approximately 3 million m³ of material will be replaced back into the development to form the building works.
- Approximately 75,000 m³ of unsuitable materials will be required to be taken off site to recycle or to a licensed tip.

Limiting removal of materials to those only which require taking to a licensed tip or recycling will reduce the amount of HGV vehicle journeys from the site. The earthworks solution proposed aims to be more sustainable than simply dig and dump of all materials. It must be noted that no earthworks operation on site is planned prior to the new development estate road access being built. No construction traffic will go via Baginton or Bubbenhall villages.

Landscape and Biodiversity Strategy

The Landscape Strategy for the proposed development has been prepared following extensive site surveys and appraisals, detailed consultations with relevant parties and groups and careful consideration of the issues as part of the overall design and planning process. It responds to issues of existing sensitivity and interest, landscape character and context, visual impact and amenity, ecology and biodiversity, and to the relevant planning and environmental policy context.

Notwithstanding the key principles of development, land use and transportation, the project has been underpinned by a sustainable design philosophy. The Landscape and Environmental Strategy has been central to this process and has shaped the resultant development parameters.

The strategy will ensure the establishment of a strong and cohesive framework of landscape and environmental areas. These will form one of the main organising elements of the overall development and will be fully integrated with the built development and infrastructure zones. In this respect it has not been designed (or should not be considered) as a separate part of the overall proposed development.

A number of key landscape and visual considerations have been identified as part of the assessment process. These include the following:

- Baginton (including the Lunt Fort, Conservation Area and Listed Buildings);

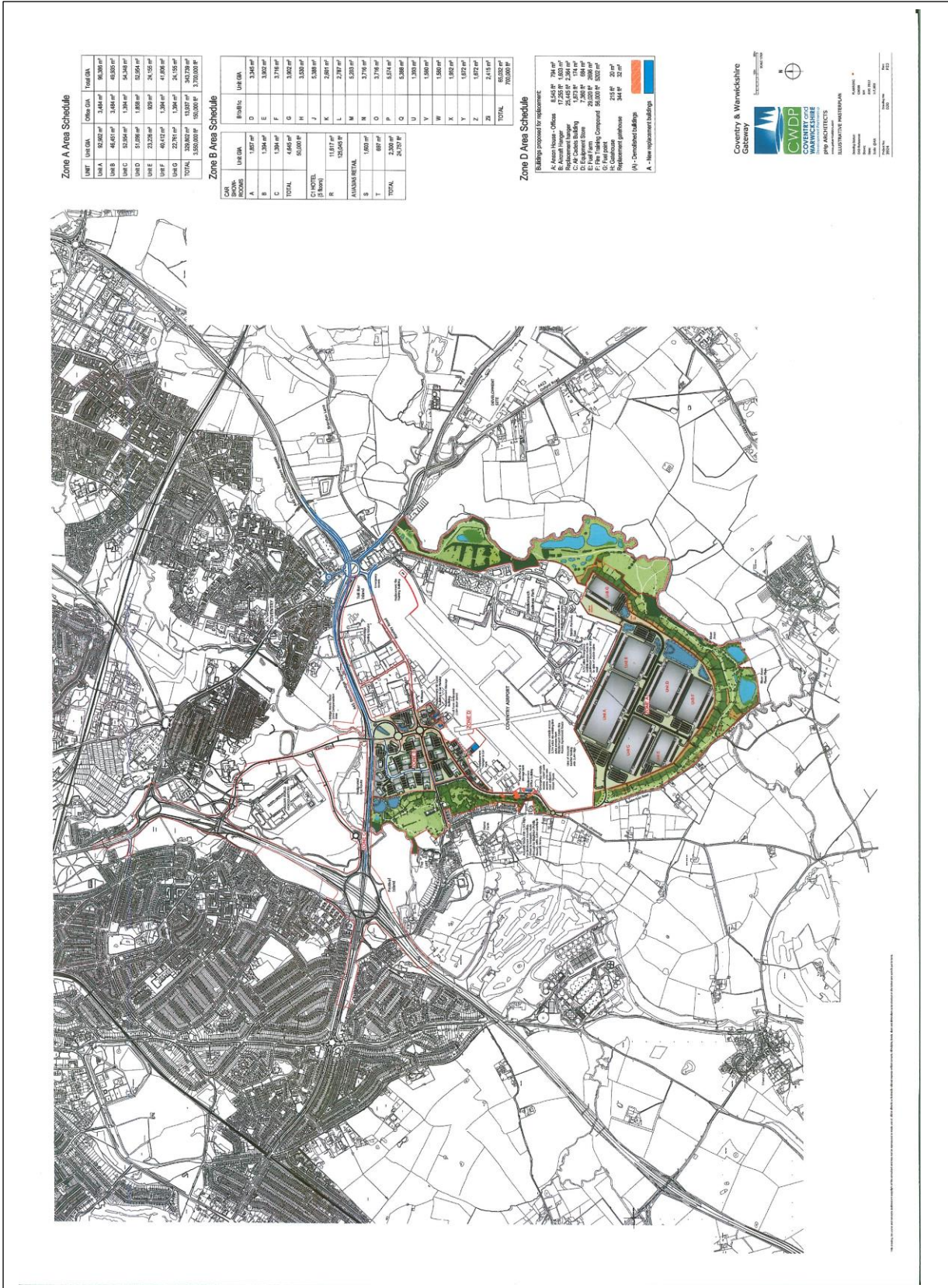
- Bubbenhall (including the Conservation Area and Listed Buildings) and the countryside and Public Rights of Way to the south of the site;
- Other surrounding properties and settlement areas with views towards the site;
- Opportunities to create a connected and robust network of green infrastructure surrounding the site – offering linkages between the River Avon Valley and countryside to the south and Coventry and the urban area to the north;
- Opportunities to deliver significant landscape enhancements.

The proposed Landscape Strategy has been devised to deliver substantial landscape and related environmental and recreational benefits. The perimeter landscape area extends to over 100 hectares and represents almost half the overall total site area, south of the A45.

Summary of Landscape Benefits:

- Creation of significant new public open space and community areas, designed for the benefit of surrounding residents;
- Formation of approximately 9,500 metres of new public footways/ cycleways (currently there are no public rights of way or access to the site);
- Provision of a co-ordinated and high quality range of countryside seating, signage, fencing and access control measures;
- Planting of around 12 hectares (120,000 sq m) of new native woodland with more than 30,000 trees;
- Creation of over 5,000 metres of new native hedgerows;
- Establishment of grassland, pasture and meadow habitats;
- Commitment to the long term management of all public open space, landscape and ecological areas;
- Promotion of the long term benefit to nature conservation by entering into the Warwickshire Biodiversity offsetting pilot scheme.

Illustrative Masterplan



Development Zones Illustrative Masterplan



Zone B Area Schedule

GN	SHEDS	UNITS	GN	UNITS
A	1,887 m ²	D	3,345 m ²	
B	1,394 m ²	E	3,902 m ²	
C	1,394 m ²	F	3,716 m ²	
TOTAL	4,845 m ²	G	3,902 m ²	
	50,000 m ²	H	3,530 m ²	
		J	5,388 m ²	
		K	2,607 m ²	
		L	2,787 m ²	
		M	5,203 m ²	
		N	3,716 m ²	
		O	3,716 m ²	
		P	5,074 m ²	
		Q	5,388 m ²	
		R	11,817 m ²	
		S	12,946 m ²	
		T	887 m ²	
		U	1,393 m ²	
		V	1,580 m ²	
		W	1,580 m ²	
		X	1,580 m ²	
		Y	1,672 m ²	
		Z	1,672 m ²	
		AA	2,415 m ²	
		TOTAL	85,052 m ²	
			70,000 m ²	

Zone D Area Schedule

UNIT	UNITS	Office GFA	Total GFA
Unit A	8,545 m ²	754 m ²	9,299 m ²
Unit B	17,260 m ²	1,603 m ²	18,863 m ²
Unit C	25,645 m ²	2,364 m ²	28,009 m ²
Unit D	1,873 m ²	174 m ²	2,047 m ²
Unit E	7,380 m ²	684 m ²	8,064 m ²
Unit F	26,000 m ²	2,600 m ²	28,600 m ²
Unit G	98,000 m ²	9,800 m ²	107,800 m ²
Unit H	215 m ²	30 m ²	245 m ²
Unit I	344 m ²	32 m ²	376 m ²
Unit J	2,415 m ²	30 m ²	2,445 m ²
Unit K	22,781 m ²	1,384 m ²	24,165 m ²
Unit L	329,892 m ²	13,937 m ²	343,829 m ²
Unit M	3,360,000 m ²	169,800 m ²	3,529,800 m ²
TOTAL	3,560,000 m ²	169,800 m ²	3,729,800 m ²

Zone A Area Schedule

UNIT	UNITS	Office GFA	Total GFA
Unit A	8,545 m ²	754 m ²	9,299 m ²
Unit B	17,260 m ²	1,603 m ²	18,863 m ²
Unit C	25,645 m ²	2,364 m ²	28,009 m ²
Unit D	1,873 m ²	174 m ²	2,047 m ²
Unit E	7,380 m ²	684 m ²	8,064 m ²
Unit F	26,000 m ²	2,600 m ²	28,600 m ²
Unit G	98,000 m ²	9,800 m ²	107,800 m ²
Unit H	215 m ²	30 m ²	245 m ²
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Unit L	329,892 m ²	13,937 m ²	343,829 m ²
Unit M	3,360,000 m ²	169,800 m ²	3,529,800 m ²
TOTAL	3,560,000 m ²	169,800 m ²	3,729,800 m ²

Coventry & Warwickshire Gateway

COVENTRY and WARWICKSHIRE
 Development Zones
 ILLUSTRATIVE MASTERPLAN

Coventry & Warwickshire
 Development Zones
 ILLUSTRATIVE MASTERPLAN

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 Development Zones
 ILLUSTRATIVE MASTERPLAN

Scale: 1:500

North Arrow

Project No: 3924
 Drawing No: 031
 Date: 15.05.2010
 Rev: P15

APPENDIX THREE (Whitley South application)

Description of Development

Parameters Plan

Illustrative Masterplan

WHITLEY SOUTH PLANNING APPLICATION: DESCRIPTION OF DEVELOPMENT

The Application is described as:

Outline application for the comprehensive development of land to the north and south of the A45 between the Festival and Tollbar Island junctions of the A45 and A46, comprising demolition of existing structures and the erection of new buildings to accommodate offices, research and development facilities and light industrial uses (Use Class B1), hotel accommodation (Use Class C1), car showroom accommodation, small scale retail and catering establishments (Use Classes A1, A3, A4 and/or A5), new countryside park, ground modelling work including the construction of landscaped bunds, construction of new roads/footpaths/cycle routes, remodelling of junctions on the existing highway network, associated parking, servicing and landscaping.

In detail the application is described as:

Technology Campus

- Demolition of existing structures (see existing land use plan);
- The remediation of the site together with ground modelling including the creation of development plateaux and landscape bunds;
- The development of up to 70,683 sq m of mixed B1 buildings intended primarily for Automotive technologies together with hotel(s) (Use Class C1); Retail unit(s) (Use Class A1, A3, A4 and A5); and car showroom(s), comprising:
 - Up to 56,766 sq m of B1 (primarily B1b/B1c space) and car showroom(s) (of which a maximum of 4,645 sq m will be used for car showroom space)
 - Up to 2,300 sq m of ancillary A1, A3, A4, A5 floorspace
 - Up to 11,617 sq m of C1 floorspace.
- Associated access, parking, servicing, infrastructure and landscaping;
- Strategic landscaping including the creation of publicly accessible open space in a countryside park.

Highway Works

- New highway works comprising:
 - (i) Works to A45/A46 including a new bridge over the A45
 - (ii) Works north of A45
 - (iii) Works to access the development south of A45

Note: These works are submitted for approval now. Associated works to off-site highway junctions are also proposed as part of the application.

- These comprise:
 - Works to Festival Island
 - Works to Whitley roundabout
 - A46 Stoneleigh Road junction

The scheme is interrelated with JLR's expansion plans for the Whitley Business Park site which they have recently acquired. The scheme includes infrastructure on and around the Whitley Business Parksite, and these works will help to facilitate the development of that site.

The application site totals approximately 105 ha. This can be broken down having regard to the Parameters plan, as follows:

Technology Campus development plots	28.17 ha
Technology Campus landscape	21.53 ha
Highways	55 ha

Development Principles and Vision

The application proposals are a direct response to the requirements of Jaguar Land Rover resulting from its recent and projected growth and its plans to expand its powertrain and Research and Development functions at Whiteley

The scheme will be anchored by Jaguar Land Rover to meet their needs and will encourage other businesses to locate on the development, which could include some of their core suppliers. It will bring forward significant investment, job creation and economic advantages for the region as well as local communities, whilst managing environmental effects and delivering an extensive package of highway, landscape and other benefits.

The approach to the masterplanning, access and landscaping of the site seeks to provide a context for high quality, flexible employment space, with excellent transport links including public transport and a prestigious location and setting. In this way the ambition for the site is for it to reflect the status and ambition of Jaguar Land Rover, in terms of its quality and commercial attractiveness.

The buildings will be set in a well landscaped, largely wooded enclosure with well landscaped plots. A striking internal environment to the development will be created along the road corridors to present a prestigious and high profile image.

JLR's vision for the site is one of a sustainable flagship development with a clear sense of place and a strong emphasis on landscaping and biodiversity. It is intended that the development will embrace

the latest techniques in design and construction and will be planned and designed to the highest standards.

Infrastructure

Current access arrangements in and around the site are poor primarily because too much traffic needs to pass through an inadequate sequence of junctions, particularly at peak times. Congestion is a major problem and is a major deterrent to private sector investment. In order to support development, major improvements are needed.

The proposed highway improvements build on an improvement already being carried out by Highways England to Toll Bar junction. They seek to establish a high quality, efficient and direct access into the site from the strategic highway network; the A45/A46. In doing so the proposals will have major additional benefits to the highway network by relieving existing congestion and freeing capacity for growth in the wider area. These benefits are significant and are over and above those which will arise from Highways England's Toll Bar scheme alone. The comprehensive transport solution has required a coordination with the Toll Bar improvement scheme to represent an efficient, effective and economic public/private cooperation with widespread benefits.

Based on a detailed appraisal of the current situation, the following package of highway works are proposed. These are shown in detail on the application plans.

- (i) Construction of a new grade-separated junction onto the A45 Stonebridge Highway to serve the Whitley South site, the JLR Headquarters and Whitley Business Park development.
- (ii) Construction of a new link road through JLR Whitley to the A444, at which point the newly built A444 Whitley Interchange will be modified to provide bus priority.
- (iii) Restriction of access along Rowley Road through Baginton, along Rowley Road to Toll Bar, Leaf Lane and along the A45 where Emergency Accesses are proposed; all existing highway users continue without change.
- (iv) Improvement to:
 - A45/A46 Festival (Stonebridge) Island;
 - A46 Stoneleigh Road junction;
 - A444 Whitley roundabout.

Public transport currently accounts for 7% of local travel but will be expected to cater for up to 15% of employee peak hour movements. Since the services will also run through local population areas, past key transport nodes and into the various Town and City centres, they will naturally pick up an amount of third party traffic en-route. This will be encouraged to help deliver traffic reductions across the base network and thus spread the benefits of the scheme.

Jaguar Land Rover operate a Green Travel Plan for each of its UK sites in order to encourage employees to use sustainable modes of travel.

Landscape and Biodiversity Strategy

The Landscape Strategy for the proposed development has been prepared following extensive site surveys and appraisals, detailed consultations with relevant parties and groups and careful consideration of the issues as part of the overall design and planning process. It responds to issues of existing sensitivity and interest, landscape character and context, visual impact and amenity, ecology and biodiversity, and to the relevant planning and environmental policy context.

Notwithstanding the key principles of development, land use and transportation, the project has been underpinned by a sustainable design philosophy. The Landscape and Environmental Strategy has been central to this process and has shaped the resultant development parameters.

The strategy will ensure the establishment of a strong and cohesive framework of landscape and environmental areas. These will form one of the main organising elements of the overall development and will be fully integrated with the built development and infrastructure zones. In this respect it has not been designed (or should not be considered) as a separate part of the overall proposed development.

A number of key landscape and visual considerations have been identified as part of the assessment process. These include the following:

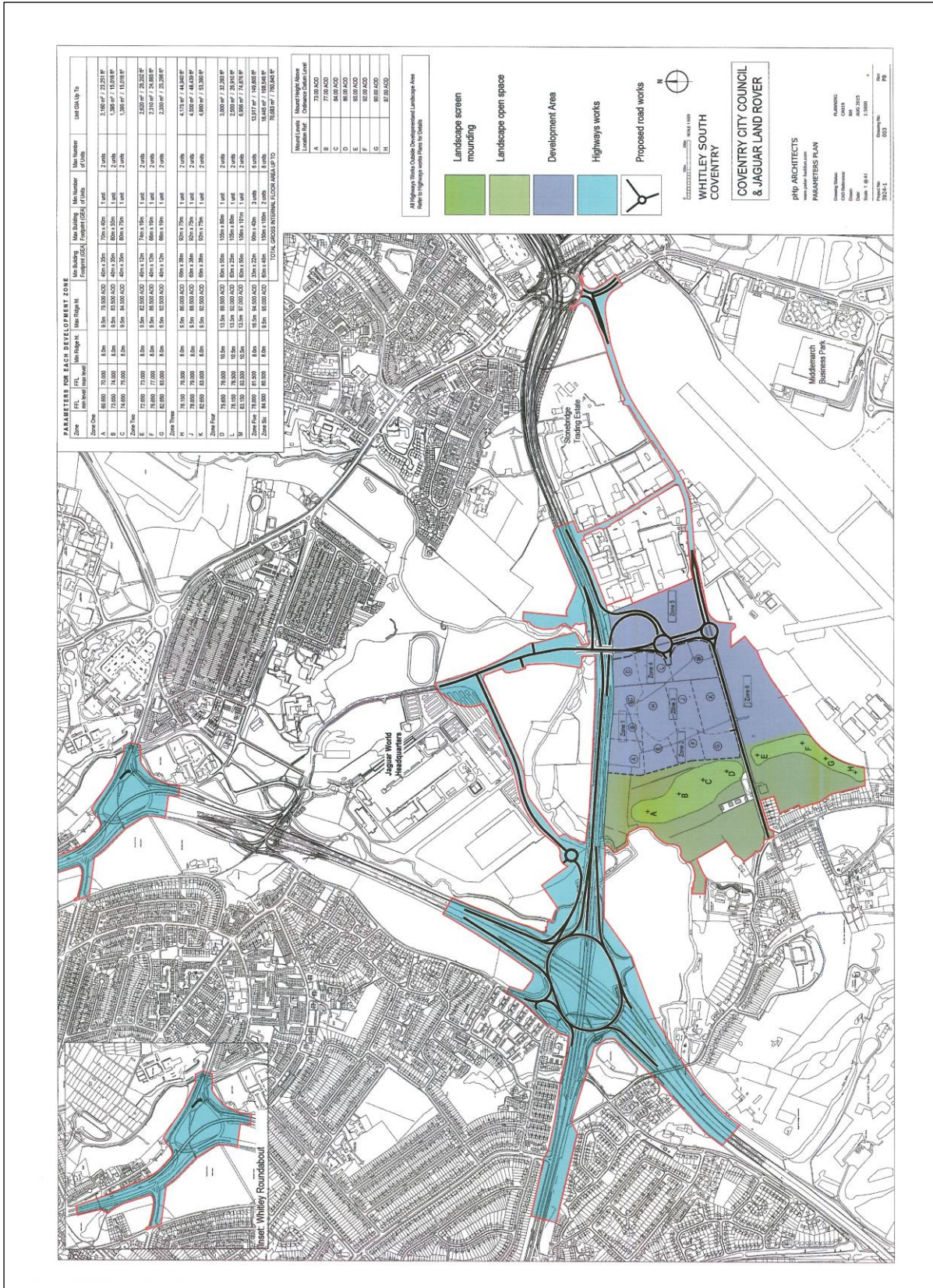
- Baginton (including the Lunt Fort, Conservation Area and Listed Buildings);
- Other surrounding properties and settlement areas with views towards the site;
- Opportunities to create a connected and robust network of green infrastructure surrounding the site;
- Opportunities to deliver significant landscape enhancements.

The proposed Landscape Strategy has been devised to deliver substantial landscape and related environmental and recreational benefits. The perimeter landscape area extends to over 21 hectares and represents almost half the area of the Technology Campus site.

Summary of Landscape Benefits:

- Creation of significant new public open space and community areas, designed for the benefit of surrounding residents;
- Formation of approximately 2,400 metres of new public footways/cycleways (currently there are no public rights of way or access to the site);
- Provision of a co-ordinated and high quality range of countryside seating, signage, fencing and access control measures;
- Planting of around 3.75 hectares (37,500 sq m) of new native woodland;
- Creation of over 1,550 metres of new native hedgerows;
- Establishment of grassland and pasture habitats;
- Commitment to the long term management of all public open space, landscape and ecological areas.

Parameters Plan



APPENDIX FOUR

Delivery Statement by Roxhill

Statement from Roxhill

Roxhill Developments Group Limited (“Roxhill”) was set up in 2010 and was financed by a combination of the senior management team and private equity funds through Forum Partners, Abstract Security and CBRE Global Multi Manager. £105m of capital was raised and used to acquire, control and develop prime UK logistics land in the Midlands and South East, enhancing value through planning, construction and pre-letting and selling developments.

Given the often long term nature of the development sites, the business sought a new investment partner in late 2015 in order to enable the company to return funds to the original investors through realisations over the following 3 years. The group’s interest in development sites were essentially split into two, the first being those sites where planning permission had been granted and units could be completed and profit realised within the following 3 years. The second were longer term investments where planning had yet to be achieved and further capital was required to secure planning and fund the overhead of the business.

On 22 February 2016 Roxhill was pleased to announce that they had created a partnership with SEGRO plc (“SEGRO”), which will provide Roxhill with the necessary funding to secure planning permissions and SEGRO access to a portfolio of big box logistics warehouse developments sites in their core geographical area. The two companies had already proved a cultural fit having established a successful joint venture in 2013 at the Rugby Gateway site. SEGRO is listed just outside of the FTSE 100 with a market cap of £3.35 billion. Accordingly, SEGRO brought to the partnership the scale of balance sheet to invest in the infrastructure requirements of the Roxhill sites in creating the investment yielding units. At 30 June 2016 it reported a portfolio valuation of £5,911 million with group net borrowings of £1,707 million representing loan to value of 36%. With its non-income producing assets held at less than 10%, their appetite to invest in land whilst their estate continued to generate income made them an attractive proposition to the Roxhill management team. SEGRO investments in the Midlands include, Hams Hall Distribution Park Birmingham, Grove Park Leicester, Rugby Gateway, and several units at Magna Park and DIRFT.

The management team, employed by Roxhill Management Rugby Limited (‘RMRL’) act as development manager to the new partnership and will work exclusively with SEGRO on the existing sites and future acquisitions once Roxhill has completed the existing development projects with the initial investors.

The deal was structured as an initial investment for 50% in 11 sites, offered at a discount to market value, with additional consideration payable on each site should a planning permission be achieved. At that point SEGRO have the right to buy Roxhill’s remaining 50% in the sites at market value. The partnership gives SEGRO access to sites before Roxhill has created the investment, thus enabling it to buy into the product at a competitive price by taking on some of the planning and development risk.

As at August 2016, the partnership has successfully transitioned land with planning at sites in Kettering and adjacent to East Midlands Airport, which together will deliver in excess of 7.5 million sq ft of logistics floorspace and a rail freight terminal. Roxhill’s interest in Coventry Gateway is split 50% SEGRO:Roxhill, with the other 50% being held by the Rigby Group.