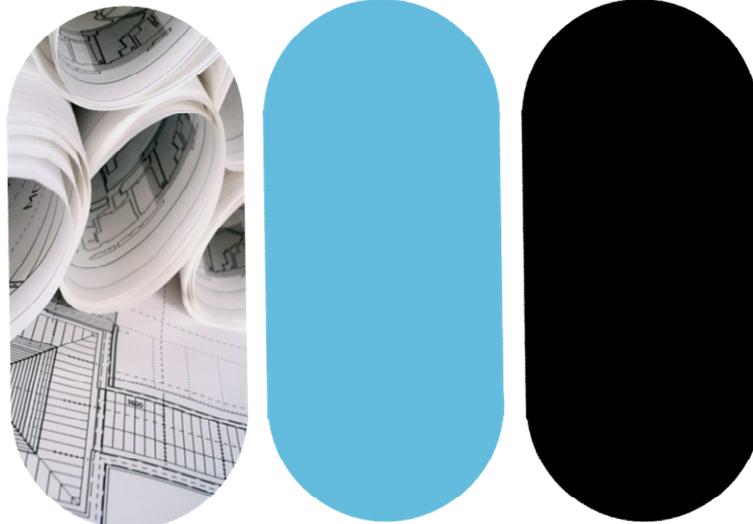


Representations on behalf of C Walton Ltd

Harborough District Council New Local Plan Options

**Proposed Policies for Bruntingthorpe Proving Ground and
Bruntingthorpe Technology Park**

Draft Interim Version – October 2015





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1. INTRODUCTION

- 1.1 On behalf of C Walton Ltd, owners and operators at Bruntingthorpe Proving Ground (“BPG”) and Industrial Estate (“BIE”), we are delighted to provide representations to the new Local Plan which will contain a new site allocation policy to replace the saved policies of the Local Plan 2001.
- 1.2 The aim is provide a framework to positively and effectively manage future development and economic growth at Bruntingthorpe to 2031, whilst continuing to protect local communities from any environmental effects that could arise from the activities on site, including noise and traffic generation.
- 1.3 This representation is a proposed policy approach made on behalf of the C Walton Ltd in response to Q9. of Harborough District Council’s Strategic Consultation on the New Local Plan Options which asks:

“Do you have any comments to make on the proposed policy approach to Bruntingthorpe Proving Ground?”



2. BACKGROUND

- 2.1 BPG and BIE forms a 271 Ha site with a 6.5km driving circuit and a 60m wide, 3.2 km runway/straight.
- 2.2 The site currently provides full-time employment for in excess of 475 people, with a further 70 full-time jobs anticipated with the erection of European Research and Development Headquarters in 2016 for a globally recognised motorcycle brand. C Walton Ltd has developed test facilities and high quality accommodation for the automotive and aerospace industries, with a solid tenant base, (including the global R&D centre for JLG - a leading manufacturer of telehandler lifting equipment for uses in all industries). The site provides a range of proving and testing facilities and fosters job creation for research and development in these sectors.
- 2.3 Bruntingthorpe Integrated Automotive Solutions (BIAS) also provides whole life vehicle management services to vehicle manufacturers, finance houses, contract hire and leasing companies, rental companies, car dealer groups and corporate fleets. This high volume activity spans cars, light commercial vehicles, HGV's and plant and covers the first registrations and preparation of new vehicles through to vehicle storage, in-life pool fleet management and de-fleet and disposal.
- 2.4 BPG has developed a broad customer base, including a range of globally recognised vehicle manufacturers, and local universities, (including De Montfort University, Leicester University, Coventry University, Sheffield University, together with Birmingham and Loughborough Universities) making an important contribution to the knowledge economy.
- 2.5 The site hosts a symbiotic series of business activities on the site which include automotive research and development (J L G Technology & Development Centre, and the future motorcycle European Research and Development Headquarters) extensive vehicle storage facilities, fleet management, and refurbishment capacity known as BIAS (Bruntingthorpe Integrated Automotive Solutions Fleet Management) (C Walton Ltd); vehicles sales and disposal (Manheim Auctions), aviation services (GJD Services Ltd),



aerospace and defence activities (for clients such as the MOD), in addition to accommodation for corporate events and national events such as Plantworx).

2.6 Sector focuses include:

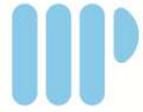
- Advanced Manufacturing/Engineering
- Automotive (R&D through to retail/remarketing/de-fleet)
- Aircraft recycling and maintenance
- ICT
- Low Carbon Industry
- Transport
- Tourism and Hospitality

2.7 The site, which is fully owned and managed by C Walton Ltd, is a unique asset and a key piece of knowledge infrastructure for the local economy. It provides a platform for technical testing, innovation, R&D and events across a range of sectors.

2.8 BPG is home to a range of nationally and globally significant employers, including companies operating in advanced manufacturing, aerospace and the automotive sector. Many of the tenant companies are award winning, high growth operations.

2.9 The activities that take place at BPG are consistent with the priority growth sectors of the Leicester and Leicestershire Enterprise Partnership (LLEP), and display strong linkages with the higher education and knowledge sectors and other local R&D nodes.

2.10 There are around 480 staff employed directly on the site. These jobs are a mixture of both highly skilled engineering occupations, as well as a range of administrative and marketing roles. The majority of the jobs (circa 70%) are taken by residents in Harborough and its adjacent districts. It therefore provides an important source of employment for local residents. The total wage income generated on site is estimated at £14.2 million per annum, with an average salary of around £27,400. This is higher than the regional average and reflects the skills of the on-site workforce.

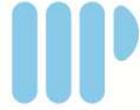


2.11 With existing high-profile international businesses in the transport sector resident at BPG and BIE, there is an opportunity to develop this key employment site as a transport cluster of businesses focusing on the sectors above, utilising and developing an existing local labour force and incubating excellence in what is a growing, knowledge-based industry in the region.



3. The Site and Surroundings

- 3.1 BPG and BIE (“the Site”) is situated to the south of the village of Bruntingthorpe. The site has a history of use for military aircraft movements, high-performance car testing, the testing of other vehicles, and vehicle storage. It accommodates an aircraft museum which attracts in excess of 7,000 visitors per annum (including two Cold War Jet Taxi days per year) and hosts a range of other product launches and events which attract in excess of 67,000 people per annum to the site.
- 3.2 Other activities include vehicle refurbishment, a car auction and the recycling and maintenance of aircraft. As well as vehicle testing, Bruntingthorpe offers facilities for fleet management storage of vehicles and aircraft, film production, driver tuition, emergency services training, military/civilian testing of large scale / heavy equipment and vehicles, and events including corporate hospitality and teambuilding exercises.
- 3.3 The proving and testing of motor vehicles (permitted by the Secretary of State in 1971) takes place on the main 4 mile long circuit; the principal feature of which is a 2mile long 60m wide straight former USAF runway. The BPG complex (i.e. The Proving Ground and Industrial Estate) has a secure access and security building at the Bath Road access to the north east. Vehicles which enter the access are registered by the security personnel.
- 3.4 There are a range of employment uses allied with the B Class employment activities for which the site has a land use designation in the saved policies of Harborough District Council Local Plan (2001).
- 3.5 The extent of uses and activities currently carried out at BPG and adjacent Industrial Estate are set out at Maps 1 & 2 attached.



Relevant Planning History

- 3.6 The relevant planning history allied with the site which covers the full extent of uses on the site is as follows:

The Proving and Testing of Motor Vehicles

- 3.7 Planning permission was granted in 1973 (ref: 71/0428/16-LDRC) for the change of use of the whole airfield to a proving ground for the testing of motor cars and commercial vehicles.

The Aircraft Museum

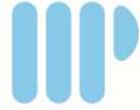
- 3.8 Planning permission was granted in 1984 (ref: 83/1774/3) for an Aircraft Museum. This was followed by a planning permission in 2000 (ref: 99/0529/03) for the Lightning Preservation Group.

Vehicle Storage

- 3.9 Multiple planning permissions have been granted during the late 1980s and the 1990s on a number of areas of the site for the storage of motor vehicles. These include ref: 86/2174/03, ref: 90/2422/03, ref: 92/1532/03, ref: 96/0538/03 and 2002/1882/03. Cumulatively, the site provides over 100 acres of hardstanding for car storage.

2009 Planning Appeal Decision (ref: APP/F2415/C/09/2096741)

- 3.10 The 2009 Appeal Decision sought to rationalise all non-proving and activities on the site on a temporary basis subject to conditions and an appropriate monitoring period. These uses have since been granted planning permission permanently and set out in condition 2 of the decision letter as follows:
- a) the use of vehicles owned and operated by the emergency services and other government agencies (“emergency services”)
 - b) use of vehicles by media organisations for the purpose of photography or display. This use excludes attendance by members of the public (“media”)
 - c) the use of go-karts (“go karts”)



- d) vehicles which are being used for the tuition of drivers (“driver tuition”)
- e) vehicles which are operated for the purposes of Corporate Entertainment and which have been approved for use under the terms of the Operational Programme (“Corporate Entertainment”)
- f) use of the site by cycling clubs (“cycling”)

Car Auctions

- 3.11 In October 2010 the Council granted planning permission (ref: 10/01089/FUL) for the use of Hangar B1 and associated land as a car auction subject to conditions. Manheim are currently the key auction operators and up to 145 auction events are hosted for per annum.

Events Centre

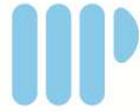
- 3.12 Planning permission was granted in 2014 by the Council (ref: 13/01770/FUL) the change of use of a storage and distribution unit (Class B8) to an events facility (Class D2) subject to conditions. This building is named “Hangar ‘42” (formerly known as “Treetops”) and provides a facility for product launches, exhibitions, conferences and other media and social events.

Aircraft Recycling

- 3.13 Temporary planning permission was granted by the waste authority (Leicestershire County Council) in 2011 (County ref: 2012/1194/03) to change the use of two of the aircraft pans to provide for an aircraft recycling operation. This planning permission was made permanent by the Leicestershire County Council by December 2014.

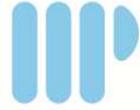
28 Permitted Development Days

- 3.14 In addition to the formal planning permissions to provide for the range of activities which take place on the Proving Ground, there are 28 (PD) permitted development days which are provided by Part 4 (of Schedule 2) of the General Permitted Development Order 1995.



4. NOISE MANAGEMENT REGIME

- 4.1 Since 2009, C Walton Ltd (“the Operator”) has undertaken to observe and manage a strict programme of noise management programme on the site in partnership with Harborough District Council including observation of the requirements of a Noise Management Plan and Unilateral Undertaking.
- 4.2 As part of the Noise Management Plan (NMP), Harborough District Council (HDC) continue to keep a Noise Complaints Register (NCR), which allows comparisons to be made with a monthly maintained Track Diary. The Applicant liaises with the Council in respect of the means of conveying noise monitoring information in accordance with the requirements of condition 12 of a planning permission granted in 2009 by the Secretary of State.
- 4.3 Noise events are recorded by way of a “Cirrus” Noise Monitoring System (NoiseHub), which includes two onsite noise monitors (trackside and boundary) and the Track Diary is maintained by the operator and shared with the Local Planning Authority on a monthly basis. This assists in ascertaining impacts from noise events, isolating those events and establishing they are lawful. On site track and noise monitoring is controlled by the operators which are in turn monitored by Council Officers to ensure that vehicles which may breach the provisions of the NMP are identified and immediately called off the track thereby helping to protect the amenities of surrounding residents.
- 4.4 The operators maintain a strict programme of continuous monitoring and management of all site activities. The cumulation of development and the environmental impacts of all activities on the site are subject of on-going monitoring and consideration by the local planning authority, Harborough District Council.
- 4.5 The NMP and the Unilateral Undertaking (“UU”) (allied with the 2009 permission) are considered by Harborough District Council to establish controls which constitute the current “the noise management regime” and provides an effective basis for influencing control over, and monitoring the noise environment of Bruntingthorpe Proving Ground.



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- 4.6 The NMP, cross referenced in several of the conditions of the 2009 planning permission, requires the presence of permanent noise monitors on the site. The continual stream of data arising out of the noise monitoring, provides a quantitative evidence base to allow the prevailing noise environment (baseline) in the locale to be better understood. This baseline assists the LPA in making decisions when assessing the impacts of any new development or noise generating activity on the site. The cumulative environmental impact of all track activity can be better understood by reference to this data.
- 4.7 The day to day monitoring of Bruntingthorpe Proving Ground arises from the requirements in Condition 12 of the 2009 permission for the site owners to convey noise data to the LPA, and Condition 17, which requires the site owners to regularly provide a Track Diary identifying each activity undertaken on the track. These conditions have proven to be both effective and enforceable.
- 4.8 In addition to requiring provision for recording and monitoring equipment, The NMP also requires the landowners to convey information to the LPA information relating to the days and times of track use, to have in place marshalling for events, complaints procedures, restrictions on spectators, and ensures “road legal” compliance (i.e. silencing where necessary) of vehicles on the track.
- 4.9 The NMP, together with the suite of conditions, allied with the 2009 decision letter, provide the context for the LPA to engage with the site owners in order to continually monitor noise events emanating from the site.
- 4.10 The noise management regime provides the LPA with a mechanism to gather and collate noise and track use data which allows breaches to be identified and, where appropriate, remedial action to be taken.

Positive Benefits of Community Engagement

- 4.11 There has been positive feedback from the local community since 2010 as a result of an initiative between Harborough District Council and C Walton Ltd to make greater efforts to engage with local stakeholders. It is considered that increased community engagement since 2010, has led to a greater understanding from local people about the nature of the businesses and of noise



generating activities on the site. This has contributed to an improved perception of the business uses at Bruntingthorpe.

- 4.12 Since the appeal decision in 2009, C Walton Ltd has, with the support of the District Council, engaged to a greater degree with the local community. Open meetings have been held on site through liaison with the District Council and surrounding Parish Councils.
- 4.13 Attached at Appendix 1 is a copy of minutes from initial public meetings in September 2010 and March 2011 between the local community, representatives from the District Council and C Walton Ltd. Subsequent ‘Open days’ have been held bi-annually (generally two meetings in late summer) and these have been very well attended (up to 150 people per annum). The meetings involve an introduction and presentation, followed by a tour of the site, and questions and answers.
- 4.14 Part of the feedback from the open meetings indicated that the local community wanted to have more notice of larger events held on the site. Consequently, C Walton Ltd maintain a “Members Area” on their webpage (www.bruntingthorpe.com) which is continually updated to notify local people of larger events in the area. The extent of community engagement has undoubtedly led to an increase in the awareness of local people for forthcoming events and in addition to the ongoing effectiveness of the Noise Management Regime, has consequently resulted in a downward trend in the number of complaints registered by the District Council, as can be seen from Table 1 below.

Year	Number of complaints
2012	155
2013	52
2014	77
2015	15 (to October 2015)

- 4.15 The level of community engagement carried out by C Walton Ltd has been recognised at the Midlands Family Business of the Year Awards 2013. Against competition from more than 20 nominated family-run businesses, C Walton Ltd was runner-up in the “Commitment to the Community” category, winning a



'Highly Commended' award from the judges. At Appendix 2 is a 2012/2013 Press Release related to the Midlands Family Business of the Year Awards.

- 4.16 One of the uses accommodated by the 2009 planning permission relates to activities by the Emergency Services. Attached at Appendix 3 are letters of thanks from various third party agencies (including Leicestershire Police Authority and the Fire Service) for the use of the facilities at Bruntingthorpe Proving Ground.



5. TRANSPORT AND ACCESS

- 5.1 Bruntingthorpe is one of 6 villages and settlements within approximately one mile of the site perimeter. The other surrounding villages are Upper Bruntingthorpe, Peatling Parva, Gilmorton, Walton and Kimcote. The site is located approximately 16km south of Leicester City Centre and situated between the M1 motorway to the west (10km to Junction 20) and the A5199 2.5km to the east.
- 5.2 The access to the site is gained via a priority junction with the C6604 Bath Lane. The C6604 joins the A5199 at the Shearsby Crossroads approximately 2.5km to the east of the site. At this point the C6604 is known as Bruntingthorpe Road.
- 5.3 The A5199 is classified as a Primary Principal 'A' road and forms part of Leicestershire County Council's strategic Countrywide Lorry Plan for heavy goods vehicles.
- 5.4 The A5199 leads towards Leicester to the north and the village of Husbands Bosworth to the south. At Husbands Bosworth, the A5199 joins the A4304, which provides access to junction 20 of the M1 to the west where traffic can join the north and southbound carriageways. The A4304 is also classified as a Primary Principal A Road and forms part of Leicestershire's main lorry route network.
- 5.5 The B5414 Pincet Lane links the A5199, to the north of Husbands Bosworth, with the A4304 at North Kilworth. The area surrounding Pincet Lane is not built up and comprises mainly of farmland. This road also forms part of Leicestershire's main lorry route network.
- 5.6 The A5199 continues south from Husbands Bosworth into Northamptonshire and passes through the village of Welford before leading to the A14. The A14 provides access to major destinations to the east and west. To the west the A14 leads to junction 19 of the M1, where slip roads provide access to and from the north only, and the start of the M6 motorway.



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- 5.7 The site is accessed via the BPG from Bath Lane, by way of a secure gated and staffed entrance to the north of the site. Bath Lane to the west has a 7.5t weight restriction (except for loading), which ensures that all large good vehicles associated with the BPG arrive and depart via the east.
- 5.8 There is limited access via Mere Road to the south, which serves the remainder of the Industrial Estate. Mere Road has a 7.5t weight restriction. Any new development takes access from Bath Lane.



6. PLANNING POLICY FRAMEWORK

The National Planning Policy Framework

- 6.1 The National Planning Policy Framework states that sustainable and competitive economic growth is central to the overarching objectives of the National Planning Policy Framework (“the Framework”), adopted in 2012.
- 6.2 To achieve sustainable development, planning should play economic, social, and environmental roles. Sustainable development should always seek positive improvements in the quality of the built, natural and historic environment whilst making it easier for job creation in towns, cities and villages (para. 9)
- 6.3 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which means that local planning authorities should positively seek opportunities to meet the development needs of their area; and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate development should be restricted (para 14)
- 6.4 Core planning principles within the NPPF also dictate that land-use planning principles should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that every country needs (para 17, point 3).
- 6.5 Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:
- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
 - set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors



likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;

- plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries (para. 21).

6.6 Encouraging a prosperous rural economy should also be central to planning policy. This means supporting, where needed, sustainable growth and expansion of all types of business and enterprise in rural areas, especially in well-designed new buildings alongside supporting sustainable rural tourism and leisure developments that benefit rural businesses (para. 28, points 1 and 3).

6.7 Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in the Framework, including the presumption in favour of sustainable development.

6.8 As referenced at paragraphs 2.6 to 2.10 above, Bruntingthorpe Proving Ground is an existing and unique major employment site which has experienced a significant increase in growth over recent years it should be seen as an appropriate location to allow for any future expansion to further accommodate sustainable economic and social growth for the transport related cluster of knowledge driven, creative and high technology industries present on the site.

6.9 Bruntingthorpe Proving Ground will play a key economic role in the sustainable, long-term development of Harborough District and a flexible suite of New Local Plan policies which continue to ensure that the Noise Management Regime is observed will provide protection for local residents and will provide a positive Framework to enable sustained growth and economic development of the site and region for the plan period.

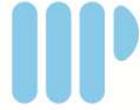


The Adopted Core Strategy (November 2011)

- 6.10 One of Harborough District Council's key objectives is to enable employment and business development across the district, reflected in Policy CS7 of the adopted Core Strategy (November 2011). Development should reinforce the strategy for settlements, as set out in Policy CS1 and Policies CS13-17 of the Core Strategy. In the context of Bruntingthorpe, Policy CS17 applies when referring to settlement hierarchy.
- 6.11 Policy CS17 dictates that development should take into account recent development and existing commitments within the settlements in question. In the case of Bruntingthorpe, the site has a long, established use as a motor vehicle proving and testing ground alongside vehicle storage and remarketing as well as aircraft recycling, and a range of other uses which makes a significant contribution to the local and regional economy. Henceforth, any future development should be in accordance with the established uses, which reflect the development of Bruntingthorpe Proving Ground and Industrial Estate as a transport related employment cluster.
- 6.12 Sub-section d) of Policy CS17 dictates that Key Employment Areas within Harborough District will be identified and protected from changes of use which may limit future business development. A continuation of the already established uses of Bruntingthorpe would be in accordance with this particular policy. However, whilst the continued development of employment related uses at the site does not give rise to conflicts with the existing Core Strategy and National Planning policies, it is considered there is a policy lacuna at local plan level, due to the age of the existing suite of policies and the extent to which they depart from more recent policy guidance.
- 6.13 Continuing to promote and develop Bruntingthorpe Proving Ground and Industrial Estate would coincide with the Leicestershire HMA Employment Land Study 2008, which recognised that, despite growth in the Leicestershire region of some 24,700 jobs, the total amount of employment land available would remain relatively static throughout this period.



6.14 The sectors related to the transport cluster (including the automotive and aviation industries) in South Leicestershire are going through a state of unprecedented growth.



7. PROPOSED NEW LOCAL PLAN POLICY FRAMEWORK

Bruntingthorpe Proving Ground, Hangar '42 and Industrial Estate

- 7.1 We propose a Local Plan planning policy framework which will allow for continued activities at Bruntingthorpe Proving Ground and to allow for any potential employment facilities subject to all new development falling under the ambit of reasonable controls. Bruntingthorpe Proving Ground is a major employer and tourism site in the region and the objective of any future policy must be to allow appropriate associated growth over the plan period to foster economic development; allow for the continued creation of jobs and the continued flourishing development of this centre of excellence.

POLICY OPTION A

Proposed Policy for new development at Bruntingthorpe Proving Ground and Hangar 42

Within the area of Bruntingthorpe Proving Ground as defined on Proposals Map 1, planning permission will be granted for further development including:

- i) The Proving and Testing of Motor Vehicles;*
- ii) Vehicle Storage;*
- iii) Aircraft Museum and related tourism development;*
- iv) Car Auctions;*
- v) The Events Centre "Hangar 42 ";*
- vi) Aircraft recycling, maintenance and storage;*

together with other uses including:

- a) the use of vehicles owned and operated by the emergency services and other government agencies ("emergency services")*
- b) use of vehicles by media organisations for the purpose of photography or display. This use excludes attendance by members of the public ("media")*
- c) the use of go-karts ("go karts")*
- d) vehicles which are being used for the tuition of drivers ("driver tuition")*



- e) *vehicles which are operated for the purposes of Corporate Entertainment and which have been approved for use under the terms of the Operational Programme (“Corporate Entertainment”)*
- f) *use of the site by cycling clubs (“cycling”)*

New development will be subject to the controls set out in the noise limits of the Operational Plan (“OP”) and the noise monitoring system set out in the Noise Management Plan (“NMP”) and the Unilateral Undertaking (“UU”) dated 11 November 2009.

New employment and tourism related development will be acceptable subject to the following criteria:-

- a. *The design, materials, massing and bulk of new development should have an acceptable impact on the character and appearance of the area;*
- b. *The existing perimeter tree planting is retained or replaced, and new planting and landscaping shall be carried out to assimilate new development into the landscape;*
- c. *It can be demonstrated through a traffic impact assessment that Traffic generated by the development and other acceptable development can be accommodated on the highway network;*
- d. *All access is taken via the main gate to the Shearsby Bath Road;*

Bruntingthorpe Technology Park (Industrial Estate)

7.2 The recent experience of C Walton Ltd is that there has been a significant increase in enquiries from transport related businesses to erect research and development facilities at to Bruntingthorpe Proving Ground. Accordingly there is a requirement to ensure that there is adequate supply of available land in the plan period to accommodate the growth for the unique demand which has arisen from across the industry.

7.3 We propose a larger allocation of industrial land to be governed by an enabling policy. The extension is proposed within the contiguous parcel of land comprising the site (i.e. replacing some of the existing proving ground) and will act as an extension to the currently allocated industrial estate (see Map 3 attached). The area will be branded as Bruntingthorpe Technology Park and the larger allocation is intended to encourage more investment leading from unique



enquiries from businesses which are interested in joining the existing research and development cluster, who would not otherwise be attracted to the District.

- 7.4 The economic benefits arising from the site are set out in the analysis attached at Appendix 4. There is an excellent context for continued sustainable economic development.

POLICY OPTION B Proposed Policy for Bruntingthorpe Technology Park

The District Council will protect the land identified at Proposals Map 3 (Bruntingthorpe Technology Park) as important allocated employment land and grant planning permission for employment or tourism related development provided that is demonstrated to the satisfaction of the District Council that the following requirements can be met:-

1. *The design, materials, massing and bulk of any new development should minimise their impact on the character and appearance of the surrounding countryside;*
2. *Existing tree planting is retained where possible and where appropriate, new or replacement planting and landscaping shall be carried out to assimilate buildings into the landscape;*
3. *It can be demonstrated through a traffic impact assessment that traffic generated by the development and other acceptable development can be accommodated on the highway network;*
4. *All access for new development will be taken via the main gate to the Shearsby Bath Road*