

29 July 2013

Delivered by email

Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa CV32 5QH

Dear Sir

WARWICK LOCAL PLAN : REVISED DEVELOPMENT STRATEGY - JUNE 2013

Thank you for the opportunity to comment on the Revised Development Strategy which we understand is part of the consultation on the Preferred Options for the new Local Plan.

We made representations on behalf of the University of Warwick to the Preferred Options consultation of May 2012 which I attach for your convenience. These set out the exceptional circumstances we believe exist to support removal of the University's Central Campus West from the Green Belt.

We subsequently had a meeting with officers, including the Development Policy Manager, and gave a presentation to Kenilworth Town Council in February 2013, which resulted in local councillors broadly supporting the principle of the University coming out of the Green Belt.

We note at paragraph 1.4 of the current document that it does not cover "the full range of topics that will be included in the Local Plan". The focused changes concern the overall development strategy and the potential sites for development that could deliver the strategy. These necessarily relate primarily to housing and employment land needs and will be further informed by the outcome of the Joint Strategic Housing Market Assessment which is underway with adjoining authorities.

The University recognises that this was perhaps not the document in which to contemplate other changes to the Green Belt, but hopes that this will still be considered as part of the Submission version Local Plan.

We do however note that Policy RDS8 (Sub Regional Employment Site) suggests that an area of land in the vicinity of Coventry Airport is identified for a major employment site of sub-regional significance and states that a policy framework will be developed which, inter alia, "*sets out the very special circumstances that would need to be demonstrated to allow this development within the Green Belt. These very special circumstances would include demonstrating the need for a major sub-regional employment development, the creation of a significant number of new jobs, evidence that there is a lack of alternative sites available and suitable and the delivery of other community and environmental benefits*".

The University has no interest in the site the subject of this policy and notes that the District Council considered an application for the 'Gateway' scheme on part or all of the land (W12/1143) in June 2013. The committee report stated:

Attention has been drawn to the fact that in the past major development in the Green Belt has been held to be contrary to Green Belt policy. Following on from this is a query about what has

changed now to make this development acceptable. The answer is that there has been no change in Green Belt policy. Green Belt policy has always allowed the exceptional grant of planning permission for what is otherwise inappropriate development where there are “very special circumstances” that outweigh the harm to the Green Belt. What has changed recently to affect the assessment of this application is the significant worsening of economic conditions as well as changes in Government policy which place much greater emphasis on the need for the planning system to do all it can to support economic growth. Furthermore there is now a shortage of suitable and preferable sites for this type of development. In light of these existing circumstances, the significant economic benefits of the proposals, together with all other considerations that favour the grant of planning permission (as referred to in the December Committee Report), are now considered to amount to very special circumstances sufficient to outweigh the harm to the Green Belt.

The draft policy in the Revised Development Strategy goes on to say that the site should remain in the Green Belt until fully developed, suggesting that it might come out of the Green Belt at some point in the future. Para 5.5.8 of the RDS states that it is not intended that this Local Plan amends Green Belt boundaries in this area, despite earlier paragraphs stating that the need for the development has been established through work with the CWLEP:

The impetus provided by the CWLEP can now be backed up by a body of evidence that has been independently prepared to assess the planning application, but which demonstrates that regardless of the merits of the specific scheme proposed in the application, there is a case for a major employment allocation.

Para 5.5.10 goes on to say that any proposal would be required to minimise the impact of new buildings on the openness of the Green Belt wherever possible, and to provide appropriate landscaping and planting to screen new development from the countryside.

Para 5.5.11 states that “to ensure that Green Belt interests are best protected” etc, the Council will seek to ensure that a comprehensive approach is taken to the development of the site.

The Revised Development Strategy wording therefore appears to seek to avoid removing land from the Green Belt to meet future development needs on the premise that allowing development in the Green Belt is meeting the same economic objective. The reason this is raised here is that the University is concerned that a similar stance may be taken – i.e. because outline planning permission has been granted for further expansion of the campus within the Green Belt, this renders its removal from the Green Belt unnecessary.

This is inconsistent with Government policy in the NPPF which states at para 83 that, when Local Plans are being reviewed, authorities should consider Green Belt boundaries “*having regard to their intended permanence in the long term*” and “*take account of the need to promote sustainable patterns of development*” (para 84) such as those identified through the Local Plan itself. When defining boundaries, para 85 states that LPAs should “*ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development*” and “*not include land which it is unnecessary to keep permanently open*” and “*satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period*”.

The University is concerned that the approach to Policy RDS8 is inconsistent with the NPPF and, should a similar approach be taken towards the ongoing and future development of the University of Warwick, it would also be inconsistent with Government policy.

We ask that these representations be taken into account and would be happy to meet and discuss with Council officers how the University's desire to remove its main campus from the Green Belt can be secured in a way consistent with national policy.

Yours sincerely

Mike Best
Executive Director

cc Bob Wilson, University of Warwick