



25<sup>th</sup> June 2014

Warwick District Council  
Riverside House  
Milverton Hill  
Leamington Spa  
CV32 5QH

Dear Sir/Madam

**WARWICK LOCAL PLAN – PUBLICATION DRAFT CONSULTATION**

My family are the owners of land to the south of Westwood Heath Road, Coventry, within the district of Warwick (see attached Site Location Plan – delineated in red). I have not previously made representations to the plan but am aware that adjoining landowners, Mr and Mrs Steele, to the west of Bockendon Road and to the east, at Hurst Farm South (delineated in green) have. The submissions made in this letter have the support of Mr and Mrs Steele.

Our site forms part of a much wider area that has been considered for development in the past, arising from the Joint Green Belt Study 2009, which identified this area as one of the ‘least constrained parcels’ of Green Belt around Coventry, worthy of further detailed consideration.

When work began on a new Core Strategy for Warwick District in 2008, the Issues and Options paper included 15 possible ‘Directions of Growth’ including ‘No.13. Land south of Coventry – Kirby Corner’ which showed an arrow pointing south of Westwood Heath Road incorporating my site.

An Alternative Sites consultation in 2010 specifically considered Hurst Farm South as a site put forward by the landowner.

Subsequently, land south of Finham (option 14) was favoured as a location for new housing and then abandoned when Coventry’s plan was withdrawn. Events have overtaken the other location at Baginton (option 15) where the new Coventry and Warwickshire Gateway industrial development is proposed.

Now, a joint SHMA has identified levels of housing need that almost certainly cannot be accommodated in Coventry. Warwick’s draft plan includes a policy to accommodate housing needs arising from outside the district which effectively triggers an early review.



However, paragraph 83 of the National Planning Policy Framework states that, once established “*Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan*”.

Warwick District Council is reviewing its Green Belt boundaries in respect of its own development needs around Leamington and Kenilworth. An earlier version of the plan proposed removing sites to the north of Leamington but this policy has been overturned in favour of sites to the south of the urban area (outside the Green Belt). Land to the east of Kenilworth, however, remains as a proposed removal and more local to my site, the University of Warwick campus is being removed from the Green Belt.

The draft plan is therefore considering alteration of Green Belt boundaries.

The NPPF also encourages local planning authorities to identify areas of safeguarded land in order to meet longer term development needs stretching well beyond the plan period and they should be satisfied that Green Belt boundaries will not need to be altered at the end of the plan period.

Paragraph 158 of the NPPF requires local planning authorities to ensure the Local Plan is based on adequate, up-to-date and relevant evidence, particularly on housing needs in their area. It recommends preparation of a Strategic Housing Market Assessment (SHMA) to determine full objectively assessed needs, working with neighbouring authorities where housing market areas cross administrative boundaries.

In this regard, Warwick has undertaken a joint SHMA with the other five local authorities in the sub-region. Recent population projections (June 2013) suggest that the rate of population growth is lower than that set out in the interim projections (September 2012) on which the SHMA was based. Despite this, it is unlikely that Coventry will be able to accommodate its objectively assessed housing needs within the city boundary.

Anticipating this to be the case, the District Council has included Policy DS20 (Accommodating Housing Need Arising from outside the District) in the Publication Draft Local Plan, which sets out a strategy to accommodate such need within Warwick District arising from any of the other five local authorities. This would trigger a Local Plan Review.

Given that Warwick could not accommodate any further housing within the district without a further review of the Green Belt, particularly if that need arises from Coventry which is constrained to the south by Green Belt, this could mean a Local Plan Review being triggered within a few years of the current plan being adopted (if that was to happen). This would, in my view, be contrary to the NPPF's intention for Green Belt boundaries to endure.

If there is a realistic expectation of Warwick having to accommodate known development needs (from Coventry) and the possibility that a joint housing study in the Greater Birmingham and Solihull LEP area also identifies needs which cannot be accommodated in the nine local authority areas covered by that study, Warwick should be taking the opportunity through this current review of the Green Belt within the district to remove and safeguard land to meet longer term development needs.

As a result of not undertaking this more thorough review of the Green Belt, the plan as published for consultation is not sound. In order for this to be remedied requires two steps:

- first, agreement with the joint SHMA local authorities on needs that cannot be accommodated within their own boundaries
- second, a further review of the Green Belt in Warwick District to remove and safeguard land to meet long term development needs, or to allocate land to meet known development needs from other local authorities

Only then could the plan be found sound, as being in accordance with the NPPF's policies on meeting full objectively assessed needs for housing and ensuring that Green Belt boundaries endure beyond the plan period.

I have not commented on the virtues of the land south of Westwood Heath Road in potentially meeting needs arising from Coventry, although I have referred to its past consideration.

I have not promoted our site directly before and, as a consequence, it does not feature in the Strategic Housing Land Availability Assessment (SHLAA) (2014); however, the adjacent site was included in the SHLAA (ref. CO3) with the comment that it was not suitable in isolation but was potentially suitable in part with the adjacent site(s) to the west (i.e. my site) if the development was rounded off.

I am also aware that the District Council has prepared a Green Belt and Green Field Review (2013). My site is included within Parcel BG7 as "Land South of Westwood Heath". The parcel is much larger than that considered in the Joint Green Belt Study 2009 and the Review concludes that the parcel is of high value to Warwick's Green Belt. I agree that parts of Parcel BG7 are of high value, however, if the land south of Westwood Heath Road between Burton Green and the University was to be considered separately, then its contribution would be significantly reduced.

There is no doubt that development to the south of Westwood Heath Road would require new transport and social infrastructure to support it. However, I am willing to co-operate with adjoining landowners and the District and County Councils to explore the potential of this area should the plan be subject to further review now or in the foreseeable future.

Regards

David Pittaway QC