



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

**By email**  
newlocalplan@warwickdc.gov.uk

22 April 2016

let.001.DS.SN.12500070

Dear Sir/Madam

**NUFFIELD HEALTH WARWICKSHIRE HOSPITAL, OLD MILVERTON LANE,  
LEAMINGTON SPA – REPRESENTATIONS ON PROPOSED  
MODIFICATIONS TO LOCAL PLAN.**

The following representations are submitted on behalf of our client Nuffield Health. They relate to the proposed modifications 10, 14 and 22 to the Local Plan.

Modifications 10 and 14 relate to the proposed strategic urban extension and housing allocation H44 which are adjacent to the Nuffield Health Warwickshire Hospital ('the hospital'). Modification 22 safeguards a site (S2) in the Green Belt adjacent to proposed housing allocation H44 for development in the future.

The proposed allocation and designation will significantly change the context of the hospital.

These representations request:

- The supporting text to Policy DS15 and / or Policy BE2 acknowledges the proximity of H44 and S2 to the hospital and require any future proposal (ie a Development Brief and / or a full/outline planning application) to demonstrate that the amenity and operations of the hospital are not adversely effected; and
- The hospital site is released from the Green Belt as it will no longer serve any of the purposes of the Green Belt.

These further modifications will ensure the Local Plan is sound, consistent with national policy, in particular paragraphs 83 – 85 of the National Planning Policy Framework (NPPF) and justified.

## Site Context

The hospital is located to the north of Leamington Spa and is situated at the roundabout connecting Old Milverton Lane, Stoneleigh Road and Kenilworth Road (A452). The hospital comprises two – three storey buildings with surface car parking located to the north and south of the main hospital buildings. The site adjoins the proposed allocation H44 which is located to the south.

The site has mature trees along the northern, eastern and southern site boundary which are subject to a Tree Preservation Order. Vehicular access to the hospital is from Old Milverton Lane and is situated opposite an 80 bed care home which was approved under application ref: W/11/1670. The Woodland Grange Conference and Training Centre is located to the north west of the site and there is an office complex located to the north east.

There are no neighbouring towns to the immediate north of Leamington Spa.

## Proposed Strategic Urban Extension and Housing H44

The hospital cares for approximately 40,000 patients each year and currently has 162 staff. It is a key employer in the area and provides valuable medical care for local residents.

We note modification 14 states Land North of Milverton has potential for:

*“Employment land; potential park and ride, primary school; land/ contribution for medical centre, community facilities; potential for new rail station (subject to viability)”*

Modification 10 highlights that the site has an estimated capacity for 250 dwellings but this could increase to 1,315 dwellings in the overall urban extension.

Development of this scale and type has potential to adversely affect the amenity of patients and staff in the hospital. It is requested that the supporting text to policies DS11 (Allocated Housing Sites) and DS15 (Comprehensive Development of Strategic Sites) acknowledge the hospital's proximity to proposed allocation H44 and requires any proposed development scheme to demonstrate it will not harm the hospital's amenity or hinder its operations.

## Green Belt Release

### Policy context

Paragraph 80 of the National Planning Policy Framework (NPPF) sets out the five purposes of Green Belt:

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns merging into one another;
3. To assist in safeguarding the countryside from encroachment;

4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 83 requires Green Belt boundaries to be established in their Local Plans and states:

*“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.” (Emphasis added)*

Paragraph 84 advises how Green Belt boundaries should be reviewed:

*“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”*

Paragraph 85 states, when defining boundaries, local planning authorities should meet a number of criteria including the following:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

### Analysis

The proposed modifications 10, 14 and 22 will significantly alter the context of the hospital site and it will no longer serve any of the purposes of Green Belt. The site will be adjacent an strategic urban extension and can no longer play a role in preventing sprawl and encroachment into the countryside.

Old Milverton Lane and Kenilworth Road provide a logical physical boundary to the Green Belt to the north of Milverton. As the hospital site is already largely developed it is no longer necessary to include this site with the Green Belt.

The hospital site comprises approximately 2ha and is adjacent the proposed strategic urban extension and safeguarded area which comprise 80 ha. The natural boundary of the strategic urban extension and adjoining Green Belt to the north is the railway line to the west, Sandy Lane and Old Milverton Lane to the north and Kenilworth Road to the east. However, the hospital site is currently an anomaly in this logical Green Belt boundary as the proposed

boundary has not taken into account the change in context as a result of the proposed modifications. The proposed modifications and the resultant Green Belt boundary therefore fail to take account of paragraphs 83 – 85 of the NPPF.

The site is subject to Tree Preservation Orders which will help maintain the mature boundary. This will ensure the trees screen any development on the site and wider urban extension in views from the north. However it is considered that as the site is largely developed it is no longer necessary to keep it open and retained in the Green Belt particularly in the context of the proposed modifications.

We note the Joint Green Belt Study carried out in 2009 states this area including the hospital (ie area WL 6a / 6b) as 'mid sensitive' and being of medium landscape value but worthy of further detailed study.

The Joint Green Belt Study (June 2015) assessed Parcel R1 which includes the hospital against the five purposes of Green Belt. The evidence highlights that the hospital site plays a limited role in the Green Belt. In relation to Purpose 1 it states:

*"All the development within the parcel is concentrated in the northern corner of the parcel. While the remaining areas of the parcel are open and free from development, the openness of the northern corner has been compromised by several large buildings, including Oak Medical Hospital (Warwickshire Nuffield) and Blackdown Clinic".* (Emphasis added)

In relation to Purpose 3 it states:

*"All the development within the parcel is concentrated in the northern corner of the parcel. While the remaining areas of the parcel retain the character of countryside, are open and free from development, the areas around the Oak Medical Hospital (Warwickshire Nuffield) and Blackdown Clinic are less open and somewhat urbanised by the areas of hardstanding and large buildings associated with these developments".* (Emphasis added)

Therefore, in order to ensure the Local Plan is sound, consistent with national policy and based on the most appropriate strategy and evidence it is requested the hospital is released from the Green Belt.

We trust these representations are taken into consideration in the preparation of the Local Plan. Please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully



indigo

David Smith

Enc: Response form

cc: Mr A Trigg, Nuffield Health