

R156/L23 - Red House Farm Extension Site

**Rebuttal Representation in Relation to the
SHLAA Amendments - July 2014**

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LANDSCAPE & VISUAL APPRAISAL, July 2013

1.0 INTRODUCTION

- 1.1 FPCR Environment and Design Ltd were appointed in 2013 to assess the sustainable development potential of land at Red House Farm, Lillington, Leamington Spa. Warwick District Council have already identified land adjacent to the existing urban edge off Buckley Road as being suitable for release from the Green Belt to accommodate some 8ha of housing development (L23). FPCR prepared a Landscape and Visual Appraisal in July 2013 which was submitted as part of the representations made in respect of Red House Farm addressing landscape and visual resources which demonstrated that further land to the south and east of the proposed allocation could successfully accommodate additional development. The Appraisal, a copy of which is attached at Appendix 1, were supported by an Indicative Masterplan, Illustrative Cross Sections and a Photomontage to show how the combined allocation has the potential to accommodate up to 400 new homes. A comprehensive Green Infrastructure framework is also proposed to create a sympathetic urban/rural interface which mitigates the effects of development, whilst also providing enhanced biodiversity and recreational resources. The proposals includes significant areas of native broad leaved woodland, species rich grassland, together with a network of new footpaths and bridleways connecting the settlement edge through to the Grand Union Canal and the Lias Line Sustrans Route (41).
- 1.2 The SHLAA Amendments document of July 2014 summarily dismisses the proposed expanded allocation as being "Not suitable - topography and impact on landscape quality." The Evidence Base documentation to support this judgement is said to be the "Landscape Study 2014." It is assumed that this actually refers to "Options for Future Urban Expansion in Warwick District - Considerations for Sustainable Landscape Planning - 2014 Addendum", prepared by Richard Morrish Associates (RMA).
- 1.3 These representations are based on an assessment of the above document, which is found to be fundamentally flawed in its analysis of the proposals for the suggested Red House Farm allocation extension.

2.0 2014 ADDENDUM ANALYSIS.

- 2.1 The document addresses two sites, land off Warwick Rd, Kenilworth, and the land south of the current Red House Farm allocation. The Warwick Road site was originally rejected in 2008 for the following key reason - "*This area appears to be an important strategic gap between Kenilworth and Leek Wootton. We recommend K6 is retained within the Green Belt.*"
- 2.2 Despite this key Green Belt coalescence issue being compromised, (the already narrow gap between the two settlements would effectively be halved) and despite judging that the development will cause a medium - high degree of landscape change and a high degree of visual change, (requiring "*substantial mitigation works*"), RMA conclude in the Addendum that "*landscape and visual impacts might*

be mitigated with appropriate design and commitment to long term landscape enhancement".

- 2.3 Turning to Red House Farm, RMA do not appear to adopt a consistent approach to the potential for the successful mitigation of development impacts when compared to their judgement at Warwick Road. Furthermore, they do not present any robust evidence to support their overall negative conclusions. There are a number of critical failings in their analysis, which can be summarised as follows, utilising the sub headings set out within their report.

Existing Landscape

- 2.4 RMA fail to acknowledge (despite the evidence shown on the cover sheet photograph for the Addendum) that the existing low rise urban edge of Lillington is already visible from the wider countryside to the south and east. They also suggest that Red House Farm Stables (and therefore the southern boundary of the current allocation) "*are situated at the edge of a break of slope where land falls away sharply to around 70m AOD*".
- 2.5 This is not correct. The photographs included in Appendix 1 at Figures 2 & 3 clearly show where the real "*break of slope*" lies – it is not at Red House Farm Stables, as can be seen from the contours shown on the Ordnance Survey base mapping (Figure 1) and cross sections B and C at Figure 6 within the July 2013 LVIA at Appendix 1. The significant and notable break of slope actually occurs around the southern and eastern perimeter of the proposed extended allocation. It is this zone which has been utilised as the principal Green Infrastructure corridor on the Indicative Masterplan, with a robust combination of woodland planting and open space creating an effective transition zone between the extended built development areas and the open countryside beyond.

Ecological/Historical

- 2.6 This notes that the veteran trees should be considered as having moderate to high ecological value. There is no issue with this suggestion – and all the existing trees are to be retained within the Green Infrastructure corridors which are based upon the framework of existing hedgerows. All trees and hedgerows on site can be successfully retained and enhanced, thus protecting the underlying historic landscape pattern.

Potential Landscape and Visual Impacts

- 2.7 Here the analysis is again fundamentally flawed by the judgement that the break of slope occurs south of the stables, which has already been shown not to be the case. It also additionally questions whether, due to the contours and the need for ground modelling to accommodate built development, it is practical to retain the existing tree and hedgerow network.
- 2.8 The concerns about ground modelling and retention of existing vegetation are unfounded. The contours and gradients of the areas shown on the Indicative Masterplan at Appendix 1 for built development are typical of those commonly utilised for housing on a more rolling site. Furthermore, broad Green Infrastructure

corridors are proposed to ensure that existing trees and hedgerows can be retained, with any adjustments in levels being made well beyond their necessary root protection zones.

- 2.9 FPCR have successfully masterplanned and implemented significant housing developments on very similar sites elsewhere in the country which proves that this is the case. (Weedon Hill, Aylesbury, and Kennel Farm, Basingstoke.) Weedon Hill has been recognised as a design exemplar.
- 2.10 The Addendum also suggests that "development on the south facing slopes is likely to be prominent in views from the south..." That is not the case, as is demonstrated by the Illustrative Cross Sections and Montage included as part of the original LVA. The sections show how the belts of structural woodland planting and reinforced retained hedgerows subdivide and filter views to the individual neighbourhoods within the expanded development area. In particular, the strategic woodland belt situated along the break of slope (connecting The Runghills Wood across to Newbold Comyn Park) interrupts the line of sight for walkers on the two low lying public footpaths which currently afford views towards Lillington. The lower slopes immediately below the strategic woodland are retained as open grazing pasture affording elevated views from the newly created footpaths across the countryside to the south and east.
- 2.11 The Montage demonstrates the effectiveness of this approach in mitigating the landscape and visual consequences of the built development. After 15 years only glimpses of the roofscape of the new development are visible - similar to the current views of the existing edge of Lillington, but now with the added benefit of a properly designed "green" interface with the countryside beyond.
- 2.12 It should also be borne in mind that from a landscape character perspective, the countryside to the south and east of Lillington has never been subject to any form of qualitative designation. It is not a "valued" landscape in the terms set out within the NPPF. This lower level of sensitivity was confirmed by RMA and Warwick District's own analysis in the original 2012 Sustainable Landscape Planning report, where the W10 SHLAA area (which completely encompasses the proposed expanded allocation) was found to be of mid sensitivity - the lowest of two categories. Furthermore, from a crucial Green Belt perspective, there is no risk of any coalescence occurring with any neighbouring community. There is no impact on the historic setting of Leamington. The expanded Red House Farm allocation therefore represents a sound direction for growth.
- 2.13 More distant rights of way benefit from additional existing screening provided by vegetation in the River Leam valley, and from the increased distance. There are no significant or sensitive viewpoints from within the valley such as along the Centenary Way following the Grand Union Canal, or from the northern edge of Radford Semele, which is some 2km away.
- 2.14 Similarly, views from Welsh Road in the east are filtered by existing screening in the valley bottom. Views from within Newbold Comyn Park also benefit from local vegetation screening within the park itself.

What if?

- 2.15 It is completely wrong to suggest that it would take 40 years and non native planting over 20 m tall to provide effective mitigation for the development proposals. Good practice demonstrates that normal native species woodland planted in good agricultural conditions can create effective woodland blocks within a 10 - 15 year timespan. Such planting in the strategic locations suggested on the Indicative Masterplan will provide appropriate filtering of views, as is demonstrated by the sections and montage.
- 2.16 The levels encountered in the areas proposed for built development are not out of the ordinary, and will not impose any particular constraints at the reserved matters application stage.
- 2.17 In this sort of edge of settlement location, it is likely that two storey development is all that would be required. Furthermore, there is proven growing demand for an element of single storey bungalow style development to be provided in order to cater for the needs of an ageing population. This could assist in providing a graded transition adjacent to the rural edge.
- 2.18 There is no justification for questioning the viability and maintenance costs of the suggested Green Infrastructure. Current practice shows that in the majority of cases housing developers are adopting a dedicated management company approach to long term landscape management, since local planning authorities no longer have the resources to take on this type of work efficiently.
- 2.19 Red House Farm riding school is capable of being successfully relocated elsewhere within the estate controlled by Red House Farm. There would be no loss of recreational resource as a result. The relocated riding school could form a hub for the expanded network of safe, off road bridleways.

Potential Development Area

- 2.20 The analysis set out in the preceding paragraphs demonstrates that the RMA conclusions are fundamentally flawed, and that the expanded allocation would not represent an "anomalous protrusion of the proposed settlement footprint into the surrounding landscape." It is of concern that dual standards appear to have been adopted when the analysis between Warwick Road and Red House Farm is compared. The former site lies in an inherently more sensitive Green Belt location than Red House Farm, and includes features such as a flood lit rugby club, yet is judged to be acceptable providing that "substantial mitigation" is provided and "appropriately managed in the long term". The same commitment to substantial well managed Green Infrastructure at Red House Farm is in contrast challenged as a potential weakness.

Cumulative Impacts

- 2.21 There are no potential cumulative impacts other than that associated with the existing allocation. There are no other development proposals in the locality. RMA suggest the effects of the proposed development would need to be considered alongside the effects arising from the existing tower blocks in Lillington. This is

completely erroneous. The tower blocks currently exist, so these are part of the base line landscape and visual position. The proposed development would in no way increase the significance of these landscape features. In reality, the acceptance of an expanded Red House Farm allocation is more likely to facilitate regeneration options including any plans to demolish these tower blocks as it will provide a replacement component of affordable housing. Thus the blocks are shown as being demolished on the montage.

Potential Landscape and Visual Impacts

- 2.22 RMA's conclusions on landscape and visual impacts are of course based upon their inherently flawed analysis, particularly in relation to alleged ground modelling and the potential loss of existing landscape features. They also pre suppose that the Green Infrastructure proposals will not provide adequate mitigation. Yet landscape impacts are only judged to be "medium - high" (the same as Warwick Road with its Rugby Club). The conclusion that visual impacts at Red House Farm would be "medium - high" resulting in "moderate -substantial" significance is simply not supported by any robust evidence in the report. The credibility of the RMA report is called into further question by the inconsistencies in judgement between Warwick Road and Red House Farm. The conclusion on visual impacts at Warwick Road is that it would result in a "high" magnitude of visual change (greater than Red House Farm) - yet no judgement is given as to the significance of that impact, and the new allocation is found to be acceptable.
- 2.23 In conclusion therefore, the RMA 2014 Addendum should be given very little weight. We believe it lacks the accuracy and balance required as a source of evidence, and should be disregarded. The approach to the Indicative Masterplan set out in the July 2013 submissions together with the further analysis set out in these representations demonstrates that the expanded Red House Farm Allocation is entirely sustainable and should be adopted.