

Representations to Warwick District
Local Plan
Publication Draft:
Focused Consultation 2014

On behalf of Mr H. E. Johnson in respect of
land at Red House Farm, Leamington Spa

December 2014

1. **INTRODUCTION**

- 1.1 Bond Dickinson is instructed on behalf of Mr H. E. Johnson to submit representations to the Focused Consultation in respect of Warwick District Council's Local Plan.
- 1.2 Mr H. E. Johnson is the owner of land at Red House Farm and he has actively engaged with the Council to promote this land for residential development to aid with the Council's regeneration of Lillington. This has included submitting representations to various draft Local Plan documents and evidence base documents issued by the Council in recent years.
- 1.3 We submitted detailed representations to the Publication Draft in June 2014 and we do not repeat here the content of those representations. This report regarding the Focused Consultation supplements the June 2014 report.
- 1.4 This report addresses changes to the Council's SHLAA, which has now been extended to include consideration of the Red House Farm extension site. It relates to Policy DS11 which includes an allocation for the initial Red House Farm site.

2. **FOCUSED CONSULTATION: SHLAA AMENDMENTS AND POLICY DS11**

- 2.1 The SHLAA amendments include a new site, R156, which is the Red House Farm extension site. The location of this site (and its context immediately adjoining the Policy DS11 allocated Red House Farm site) can be seen on Figure 1 at Appendix A of our June 2014 Publication Draft representations report. Whilst this site had been discussed with the Council prior to the publication of the SHLAA, it was erroneously omitted and we are pleased to see that it has now been included in the assessment.
- 2.2 However, we are disappointed with the Council's conclusion that the site is not suitable due to topography and landscape quality reasons, and we strongly disagree with this view.
- 2.3 Also submitted with this report is a Landscape Report by FPCR Environment and Design Limited which supplements the LVIA we have previously submitted. This again finds that the development of the extension site would have no greater impact on the landscape than the existing proposed allocation. It also finds opportunities to improve the urban/rural interface at this part of Lillington, and promotes the residential development of the extension site.
- 2.4 We consider that the extension site is suitable for residential development in conjunction with the Red House Farm allocation. The extension site can deliver an additional 150 dwellings and would further contribute to the regeneration of Lillington.
- 2.5 The extended site would also provide good quality public open space; increased scope for public transport to service the development; and more options for walking and cycling both

on site and in the locality. Significantly, it would generate the possibility of providing a cycle/foot bridge over the River Leam/Grand Union Canal, to connect to the Tow Path, all of which is in our client's ownership. Finally, the development of this site would also provide a new defensible Green Belt boundary which would comply with NPPF policy at paragraph 85 by using clear physical features that are readily recognisable and likely to be permanent.

- 2.6 We also note the overall increase of housing numbers by 210 as a result of changes to proposed allocations within Policy DS11 (sites H01 and H39). We welcome this increase but question why this increase was not higher and why these two particular sites were chosen. There does not appear to be a re-examination of what is the Objectively Assessed Housing Need; and no justification for why these two sites have been chosen over others. We suggest that, as set out in our previous representations in June 2014, the Council has underestimated the Objectively Assessed Housing Need by simply taking the figures from the 2011 CLG Interim Housing Projections and repeating them in the SHMA and the Local Plan, and this will lead to continued under-delivery. To remedy this the Council should increase the housing numbers to be delivered. The Red House Farm extension site should be included as an allocation for residential development if there is to be an increase in housing numbers, either by 210 or by more, as it meets the Council's strategic regeneration objectives for Lillington.

3. **CONCLUSIONS**

- 3.1 We continue to support the proposed allocation of Site HO4 – Red House Farm, in Policy DS11. However, this allocation should be increased to include the extension site at Red House Farm for the reasons set out above, in the landscape report, and in our previous representations.
- 3.2 The proposed modifications that are the subject of this focused consultation fail to address our previous concerns, and the Plan as proposed therefore remains unsound. In its current form, Policy DS11 is not justified or effective, nor is it positively prepared.
- 3.3 To make this policy sound, the Red House Farm site allocation should be increased in size and number to include the extension site. There should also be less reliance on two sites and a broader baseline for meeting the housing need as previously set out in our June representations.
- 3.4 The above issues of soundness should be addressed before the Plan is formally adopted.