

LOCAL PLAN

helping shape the district



warwickshire direct
27 JUN 2014
Lillington

Publication Draft Representation Form 2014

For Official Use Only
Person ID: 12799
Rep ID:

This consultation stage is a formal process and represents the last opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) before it is submitted to the Secretary of State. All comments made at this stage of the process are required to follow certain guidelines as set out in the **Representation Form Guidance Notes** available separately. In particular the notes explain what is meant by legal compliance and the 'tests of soundness'.

This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the plan has been made available (see the table below). You can also respond online using the Council's e-Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be received by **4.45pm on Friday 27 June 2014**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH**
or email: newlocalplan@warwickdc.gov.uk

Where to see copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and at the following locations:

Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa

Leamington Town Hall, Parade, Royal Leamington Spa

Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash

Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa

Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick

Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth

Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa

Brunswick Healthy Living Centre, 98-100 Shrubland Street, Royal Leamington Spa

Finham Community Library, Finham Green Rd, Finham, Coventry

Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.

Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Address Line 2

Address Line 3

Address Line 4

Postcode

Telephone number

Email address



3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination

Yes No

Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan

Yes No

The adoption of the Local Plan.

Yes No

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Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: LOCAL PLAN

Paragraph Number:

Policy Number: DS7

Policies Map Number:

5. Do you consider the Local Plan is :

- | | | |
|-------------------------------------------|-----|----------------------------------------|
| 5.1 Legally Compliant? | Yes | No |
| 5.2 Complies with the Duty to Co-operate? | Yes | No |
| 5.3 Sound? | Yes | No <input checked="" type="checkbox"/> |

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

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Person ID:

Rep ID:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Policy D57 provides for 12,860 homes.

ONS statistics show a population growth of 14,000 over total plan period (2014 - 2029). At the ONS occupancy rate of 2.33/home, 6008 homes are required.

However, WDC have used a ratio of 1.52 - presuming population growth to be 19,290.

But if 12,860 houses are built and occupied at 2.33/home the population will increase to 29,963 - a 21.5% increase. That is not sustainable.

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Use the ONS figures for population growth. Warwick District has a very high student population and these should be discounted in growth studies. The ONS figures correctly remove the students from the demographic projections.

Then remove the c6,800 excess houses from the Local Plan.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: LOCAL PLAN

Paragraph Number:

Policy Number: DS 11

Policies Map Number:

5. Do you consider the Local Plan is :

- | | | |
|-------------------------------------------|-----|----------------------------------------|
| 5.1 Legally Compliant? | Yes | No |
| 5.2 Complies with the Duty to Co-operate? | Yes | No |
| 5.3 Sound? | Yes | No <input checked="" type="checkbox"/> |

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not (please tick that apply):

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

See attached re DS11

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove Red House Farm from the Local Plan and retain the original green belt boundary

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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Person ID:

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Representation Form part B7 (continued)

WARWICK DISTRICT COUNCIL'S DRAFT LOCAL PLAN

Policy DS11

Policy DS11 fails to mention that Red House Farm is actually green belt and calls it "green field". This is highly misleading, and would have misled anyone considering this policy in isolation.

Policy DS11 is contrary to NPPF paragraphs 73 and 74 as the parcel H04 contains the Riding School's grazing fields. The Riding School is a valued recreational amenity which also provides employment for youngsters in Lillington as stable boys and girls. No consideration has been given in the Local Plan to the potential loss of this amenity if the area is built on: the tranquillity and lack of traffic is important for teaching riding and for the enjoyment of experienced riders who use the school for hacks. There is no plan for replacing the facility.

Policy DS11 is contrary to NPPF green belt policy paragraph 80 where it aims to "safeguard the countryside from encroachment". The green belt land in question is not degraded ie: is still open and permanent, genuine countryside. Most of the building plot is class 3a agricultural land which WDC in its own policies has previously said should not be used before lower grades for food security reasons, and that arguments for development on grade 3a must be made in terms of why lower grades have not been used first. Those arguments have not been made.

(Land at Red House Farm, Lillington Agricultural Use & Quality Report 867/1b)

Policy DS11 is contrary to NPPF paragraph 80 as no specific consideration has been given to using brownfield sites instead. WDC has not given any argument as to why 250 houses could not be provided on local brownfield or indeed on any brownfield site in the district instead of at Red House Farm. There are sites within Lillington such as the old Round Oak School which could easily provide a very pleasant development, and a site adjacent to the URC church in Cubbington Road which the church brought forward with plans for social housing with extra facilities years ago, and other places where a creative redevelopment could incorporate both employment and housing. These sites are indeed closer to the centre of Lillington and to shops etc than land over the other side of the Campion Hills at Red House Farm.

Policy DS11 is contrary to NPPF paragraph 83 as no "exceptional circumstances" exist, and no attempt to make a coherent, properly-argued, publically-available case has been made. A desire to build new housing, even with 40% social housing (which is the norm for Warwick

District for developments of that size), in a particular location because the owner is willing to sell is not “exceptional”.

Policy DS11 is contrary to NPPF paragraph 85 in the manner of the movement of the green belt boundary. The existing green belt boundary runs along a road/housing edge/ridgeline. WDC propose moving it to a hedgeline further down a hillside. There are no physical features to reinforce this boundary. This can hardly be considered a permanent boundary.

Policy DS11 is contrary to NPPF paragraph 85 in that there is no indication that the boundary will not be moved again at the end of the Plan period: a development masterplan dated July 2013 on the WDC website shows the boundary being breached with a further 17ha being added down the hillside. This supports the view that if this first development is allowed, the rest of the farm land and the historic agricultural buildings will disappear under a housing estate within 30 years. Whilst the masterplan is not within the Local Plan, the landowner and WDC have been in communication for 5 years and if the revised boundary was truly fixed, the landowner might not have gone to the time and financial effort to commission these plans.

Policy DS11 is contrary to NPPF paragraph 88 as WDC has not given any weight to or even appeared to consider the fact that the remaining green belt would be damaged – ie: openness and permanence reduced.

Policy DS11 is contrary to NPPF paragraph 88 because the area of green belt studied in relation to Red House Farm (H04) does not include the SE landscape green belt. The area of green belt (CU3) was parcelled as it is because the consideration was for housing on green belt land between Lillington and Cubbington (E-W landscape), which was later removed from the Local Plan. Plot H04 was included as part of the “fringe” development, but is in fact in a different landscape due to the topography. The rest of the green belt in that landscape wasn’t included in the studies. A portion of the building plot is not included in the green belt study.

Policy DS11 is contrary to NPPF paragraph 123 because WDC has not identified and protected “areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value”. An amenity should not have to be publically-owned to be protected. The particular topography of the Red House farm green belt shields it from noise from the town and from Lillington. Building roads and houses in this area of green belt will inevitably bring road traffic and household noise into this special landscape. WDC have not analysed noise levels in the district, which are noticeable in most footpaths and parks due to the M40, A46 and other arterial roads and urban traffic. From a sustainability perspective, people should not have to travel miles by car to find a peaceful place to walk.

Policy DS11 is contrary to NPPF paragraphs 154 and 155 as there has been no meaningful consultation with the residents and local business. Putting a Lib Dem leaflet through doors

in Crown ward, Lillington with a list of dates on, and a bin tag mentioning consultations, does not constitute proper engagement with the local community. The Neighbourhood forum has only discussed the Local Plan AFTER it was published. Leamington Spa Town Council has done nothing to inform residents of what is planned and where, and only very recently made any representation to the District. It has been apparent from talking to people in Lillington that nobody knew about the proposals. There does not appear to have been any use of local media to inform people. The local Lib Dem councillors are in favour of demolishing the flats, and so have been supporting the green belt development and telling residents that it's "inevitable". So it has been very quiet with regard to Red House Farm. Even the Riding School which leases the land was unaware that the land they use was in the Plan until a campaigner spoke to them AFTER the plan was published. Other areas in the plan have been much more high-profile due to campaigns and protests. The terminology for the Lillington developments has been misleading too, as not only is there more than one Red House farm in the district, but the farm itself is not where the building is proposed, and many people would (correctly) call it "Campion Hills" rather than by the name of the farm.

Policy DS11 is founded on incomplete studies and information. Full assessments of local wildlife have not been made, and reports which recommended further work in this area have not been heeded. Thus assessments for bats, badgers, owls, hares, skylarks etc., some of which are "red list" and have legal protection and are all known to be present on this land, have not been done.

Policy DS11 states:

2.51 Land at Red House Farm forms an extension to Lillington, one of the most deprived neighbourhoods in Warwickshire. The urban extension will provide for up to 250 new homes, of different types and tenures, and support regeneration in Lillington itself.

This is wholly incorrect. Lillington is a prosperous residential area of c11,500 which comprises much of the northern part of Leamington Spa. Warwick District has 86 **Lower** Super Output Areas, of which 18 comprise North Leamington. Of the North Leamington **Lower** Super Output Areas, the parish of Lillington has 11. One **Lower** Super Output Area, Lillington East, has an index of multiple deprivations which puts it in the 10-20% most deprived areas nationally. According to the locality Profile, there is very little deprivation in the whole of Lillington – there are only 11 out of a possible total of 77 indicators flagged.

Lillington has well-built traditional 1950's council houses with large gardens which have been well-maintained. It has a variety of newer housing of good quality. There is a wide variety of housing, spatially integrated in a well-planned housing estate. Adjacent parts of Lillington have mostly 3-bed semis in private ownership though there larger houses here and there.

Building at Red House Farm is not going to bring any types of housing to Lillington which are not already well-represented in both type and tenure.

Lillington does not require “regeneration”. There is no evidence to suggest that there is any need to demolish existing properties or that decay or dereliction is a problem – because it isn’t. Lillington is a tidy, pleasant place to live with green spaces and well-looked after homes and gardens. The main flats have been comprehensively refurbished and the housing association properties appear to be renovated and improved on a regular basis. There is no graffiti or sign of vandalism.

There is no explanation as to how building on the green belt, in a treasured landscape which currently enriches the lives of the people of Lillington, especially the more deprived who live closest to it, will “support regeneration in Lillington itself”.

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: LOCAL PLAN

Paragraph Number:

Policy Number: DS18

Policies Map Number:

5. Do you consider the Local Plan is :

- | | | |
|-------------------------------------------|-----|----------------------------------------|
| 5.1 Legally Compliant? | Yes | No |
| 5.2 Complies with the Duty to Co-operate? | Yes | No |
| 5.3 Sound? | Yes | No <input checked="" type="checkbox"/> |

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

- Positively Prepared:
- Justified:
- Effective:
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See attached re DS18

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove Red House Farm from the Local Plan and retain the original green belt boundary. Any regeneration of Lillington East should be developed in close participation with local residents and take account of residents' views. Thus it should not be in the Plan at this stage.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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Representation Form part B7 (continued)

WARWICK DISTRICT COUNCIL'S DRAFT LOCAL PLAN

Important Background Information

Policy DS18 is being used to justify the building of 250+ houses on green belt land at Red House Farm which is currently home to a riding school. This proposed building plot is in a prominent position 97m high beyond a ridgeline, overlooking a large swathe of green belt into the Leam Valley, visible from hills and ridges beyond. (Lillington is hidden behind the ridge). This high ground has some of the finest views in Warwickshire (20 miles) and is a treasured local amenity, not only for the Riding School but also for the unspoilt long country walks to the river Leam, to Offchurch and to Newbold Comyn Country Park. This landscape is highly valued by those who live adjacent and beyond as it is an accessible, free place to take children, to walk, and enjoy the health-giving benefits of relaxation and exercise. Of particular note in this green belt area is the lack of roads and the lack of noise. It is truly a tranquil area, not just in isolated parts. There are very few places in Warwick District and indeed in Warwickshire where countryside amenities can be enjoyed without the persistent background noise of traffic. All of Warwickshire's Country parks suffer from very noticeable traffic noise, mostly from motorways. This can only get worse with HS2 as that passes through tranquil rural parts of the district. Red House farm is perhaps one of the few places where some parents still allow their children an "old-fashioned" childhood, allowing them to play out, and appreciate the countryside. Adding 250 houses to the landscape will irrevocably damage the tranquillity of the area.

Representation Form part B7 (continued)

WARWICK DISTRICT COUNCIL'S DRAFT LOCAL PLAN

Policy DS18

Policy DS18 is contrary to NPPF paragraphs 73 and 74 as the parcel H04 contains the Riding School's grazing fields. The Riding School is a valued recreational amenity which also provides employment for youngsters in Lillington as stable boys and girls. No consideration has been given in the Local Plan to the potential loss of this amenity if the area is built on: the tranquillity and lack of traffic is important for teaching riding and for the enjoyment of experienced riders who use the school for hacks. There is no plan for replacing the facility.

Policy DS18 is contrary to NPPF green belt policy paragraph 80 where it aims to "safeguard the countryside from encroachment". The green belt land in question is not degraded ie: is still open and permanent, genuine countryside. Most of the building plot is class 3a agricultural land which WDC in its own policies has previously said should not be used before lower grades for food security reasons, and that arguments for development on grade 3a must be made in terms of why lower grades have not been used first. Those arguments have not been made. (Land at Red House Farm, Lillington Agricultural Use & Quality Report 867/1b)

Policy DS18 is contrary to NPPF paragraph 80 as no consideration has been given to using brownfield sites. WDC has not given any argument as to why 250 houses could not be provided on local brownfield or indeed on any brownfield site in the district instead of at Red House Farm. There are sites within Lillington such as the old Round Oak School which could easily provide a very pleasant development, and a site adjacent to the URC church in Cubbington Road which the church brought forward with plans for social housing with extra facilities years ago, and other places where a creative redevelopment could incorporate both employment and housing. These sites are indeed closer to the centre of Lillington and to shops etc than land over the other side of the Campion Hills at Red House Farm.

Policy DS18 is contrary to NPPF paragraph 83 as no "exceptional circumstances" exist, and no attempt to make a coherent, properly-argued, publically-available case has been made. A desire to build new housing, even with 40% social housing (which is the norm for Warwick

District for developments of that size), in a particular location because the owner is willing to sell is not “exceptional”.

Policy DS18 is contrary to NPPF paragraph 85 regarding the movement of the green belt boundary. The existing green belt boundary runs along a road/housing edge/ridgeline. WDC propose moving it to a hedgeline further down a hillside. There are no physical features to reinforce this boundary. This can hardly be considered a permanent boundary.

Policy DS18 is contrary to NPPF paragraph 85 in that there is no indication that the boundary will not be moved again at the end of the Plan period: a development masterplan dated July 2013 on the WDC website shows the boundary being breached with a further 17ha being added down the hillside. This supports the view that if this first development is allowed, the rest of the farm land and the historic agricultural buildings will disappear under a housing estate within 30 years. Whilst the masterplan is not within the Local Plan, the landowner and WDC have been in communication for 5 years and if the revised boundary was truly fixed, the landowner might not have gone to the time and financial effort to commission these plans.

Policy DS18 is contrary to NPPF paragraph 88 as WDC has not given any weight to or even appeared to consider the fact that the remaining green belt would be damaged – ie: openness and permanence reduced.

Policy DS18 is contrary to NPPF paragraph 88 because the area of green belt studied in relation to Red House Farm (H04) does not include the SE landscape green belt. The area of green belt (CU3) was parcelled as it is because the consideration was for housing on green belt land between Lillington and Cubbington (E-W landscape), which was later removed from the Local Plan. Plot H04 was included as part of the “fringe” development, but is in fact in a different landscape due to the topography. The rest of the green belt in that landscape wasn’t included in the studies. (see diagram)

Policy DS18 is contrary to NPPF paragraph 123 because WDC has not identified and protected “areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value”. An amenity should not have to be publically-owned to be protected. The particular topography of the Red House farm green belt shields it from noise from the town and from Lillington. Building roads and houses in this area of green belt will inevitably bring road traffic and household noise into this special landscape. WDC have not analysed noise levels in the district, which are noticeable in most footpaths and parks due to the M40, A46 and other arterial roads and urban traffic. From a sustainability perspective, people should not have to travel miles by car to find a peaceful place to walk.

Policy DS18 says:

“ Development within, or in close proximity to, the Lillington Local Shopping Centre will be permitted where:

- 1. it will not adversely affect the overall retail offer of the Lillington Local Shopping Centre or other local shopping centres; and**
- 2. it will enhance the range of services available within the vicinity of Lillington Local Shopping Centre; or it will support the creation of significant local employment opportunities “**

How are we supposed to understand this? There is nowhere to build or develop without demolishing existing buildings, unless Mason Avenue park is to be built on. And no-one uses the term “Lillington Local Shopping Centre.” From the map it is possible to tell they mean Crown Way shops. If demolition of existing, perfectly-good buildings or building on a recreation ground is being considered, surely that should be explained to the public and a proper consultation process used before being allowed in the Local Plan.

Policy DS18 contains significant inaccuracies

Para 2.77 states:

“Lillington is the most deprived ward within Warwick District and is amongst the 20% most deprived wards nationally.”

This is incorrect. Lillington (parish) is a prosperous residential area of c11,500 which comprises much of the northern part of Leamington Spa. The existence of “Lillington” as a ward is due to very recent ward changes which do not come into force until May 2015. The term “Lillington ward” does not relate to the deprivation statistics. If one were to aggregate the component lower super-output area figures for the new ward, very little deprivation if any would show up.

In the Warwickshire Observatory (WCC) report, Lillington parish has two wards, Crown and Manor. These contain 11 super-output areas. Of these, Lillington East super-output area in Crown ward has an index of multiple deprivation which puts it in the 10-20% most deprived areas nationally. The main reason this small area scores badly for deprivation is that there are three blocks of flats which have been used (in part) by WDC for housing tenants who have been evicted from other parts of Coventry and Warwickshire. The housing in Lillington East is in good order: the flats were comprehensively refurbished in the last ten years. There is no dereliction; no boarded-up houses, no graffiti. The main reasons for the deprivations according to Warwickshire Observatory’s report are lack of education, skills and training, and employment. The score for “living environment” is better than some in North Leamington.

Policy DS18 is unsound because it uses vague terms to cover potentially very dramatic changes to Lillington which are unjustified, without those affected having been given any opportunity to contribute to or assess these ideas. **No financial justification has been given to show whether the ideas are economically viable.** From talking to councillors, the ideas are:

1. Build on Red House farm to add 150 private houses (and 100 social houses to a predominantly social housing area.
2. Demolish Eden Court flats (89 1 and 2 bed), Ashton Court and Southorn Court (46 1 and 2 bed flats each). (Some flats are in private leasehold ownership)
3. Presumably build houses/maisonettes on the sites of the flats
4. Demolish the Library, Community centre/Surestart Children's Centre and Youth centre and replace with a multi-agency single building.
5. Somehow the levies from the developer of the green belt land is supposed to help fund the above.

Considering that a major pressing need is for genuinely affordable housing, it is sheer folly to contemplate demolishing flats in good order which currently come onto the market at around £66,000 for a two double-bedroom property. These present an ideal first step onto the housing ladder.

"2.78 The Council is working with its partners including the County Council to enhance social and economic conditions in the Lillington area."

Lillington residents have recently been fighting to save the Youth Work, to save the Children's Centre, and to keep the library open more than a bare minimum. Funding is a big issue, and the District Council have no control over it. It is not a sustainable plan. If they mean Housing associations, it is clear that the associations are dealing with any housing improvements in Lillington from the number of vans and workmen around.

"This may include renewing existing services and enhancing employment opportunities within the Ward."

"Renewing" presumably means demolishing the current public service facilities. The Community centre/Children's centre was only completed in 2006 at a cost of several million pounds. There is nothing wrong with any of the other facilities. The library is a notable piece of local architecture. There is no provision for employment land within Lillington. There is no evidence to suggest that new jobs would be created in the small shopping precinct (Crown Way) a mile away by building on Red House Farm. "May" does not constitute a plan. There is nothing in writing. Nothing may happen.

"A focus is an ambition to improve public services within the heart of Lillington and to enable new private sector investment to enhance employment opportunities. This policy

therefore seeks to ensure that new public services and other developments that will enhance the range of facilities and services available within close proximity to the Local Centre, can be supported.”

What new public services is Lillington supposed to require? It is well-provided, including North Leamington School facilities – and those services which are absent are not going to be added eg: police, fire, further education, waste disposal facilities, etc. It has been suggested that a new multi-agency building would incorporate a doctor’s surgery. Cubbington Rd surgery appears to serve most of Lillington. The Clinic at the top of Crown Way no longer has GP services. There is no evidence that they have consulted either NHS England property group or the local care commissioning service. Why can’t GP services go into Crown Way clinic? The Youth Centre was asked about moving into a shared building some time ago and rejected the idea on the basis it compromised their ability to reach the young people. A shared building raises all sorts of issues with different funding streams and the ability to maintain the services. There is no provision for employment land: all the land adjacent to Crown Way is occupied with either housing or services, except for Mason Avenue Park.

“ Development within, or in close proximity to, the Lillington Local Shopping Centre will be permitted where:

- 1. it will not adversely affect the overall retail offer of the Lillington Local Shopping Centre or other local shopping centres; and**
- 2. it will enhance the range of services available within the vicinity of Lillington Local Shopping Centre; or it will support the creation of significant local employment opportunities “**

How are we supposed to understand this? There is nowhere to build or develop without demolishing existing buildings, unless Mason Avenue Park is to be built on. And no-one knows the term “Lillington Local Shopping Centre.” It presumably means Crown Way. No plans or ideas have been discussed or made public to the residents and businesses who use Crown Way and live there. This really is **contrary to NPPF paragraphs 154 and 155**. There has been no information and no consultation.

Policy DS18 is founded on incomplete studies and information. Full assessments of local wildlife have not been made, and reports which recommended further work in this area have not been heeded. Thus assessments for bats, badgers, owls, hares, skylarks etc., some of which are “red list”, and are all known to be present on this land, have not been done.

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: LOCAL PLAN

Paragraph Number:

Policy Number: DS19

Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes	No
5.2 Complies with the Duty to Co-operate?	Yes	No
5.3 Sound?	Yes	No <input checked="" type="checkbox"/>

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

For Official Use Only

Person ID:

Rep ID:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

See attached re DS19

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove Red House Farm from the Local Plan
and retain the original green belt boundary

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

For Official Use Only

Person ID:

Rep ID:

Representation Form part B7 (continued)

WARWICK DISTRICT COUNCIL'S DRAFT LOCAL PLAN

Policy DS19

Policy DS19 says its changes to green belt boundaries are in accordance with NPPF. This is not true with regard to Red House Farm.

Policy DS19 is contrary to NPPF paragraphs 73 and 74 as the parcel H04 contains the Riding School's grazing fields. The Riding School is a valued recreational amenity which also provides employment for youngsters in Lillington as stable boys and girls. No consideration has been given in the Local Plan to the potential loss of this amenity if the area is built on: the tranquillity and lack of traffic is important for teaching riding and for the enjoyment of experienced riders who use the school for hacks. There is no plan for replacing the facility.

Policy DS19 is contrary to NPPF green belt policy paragraph 80 where it aims to "safeguard the countryside from encroachment". The green belt land in question is not degraded ie: is still open and permanent, genuine countryside.

Policy DS19 is contrary to NPPF paragraph 80 as no consideration has been given to using brownfield sites. WDC has not given any argument as to why 250 houses could not be provided on local brownfield or indeed on any brownfield site in the district instead of at Red House Farm. There are sites within Lillington such as the old Round Oak School which could easily provide a very pleasant development, and a site adjacent to the URC church in Cubbington Road which the church brought forward with plans for social housing with extra facilities years ago, and other places where a creative redevelopment could incorporate both employment and housing. These sites are indeed closer to the centre of Lillington and to shops etc than land over the other side of the Campion Hills at Red House Farm.

Policy DS19 is contrary to NPPF paragraph 83 as no "exceptional circumstances" exist, and no attempt to make a coherent, properly-argued, publically-available case has been made. A desire to build new housing, even with 40% social housing (which is the norm for Warwick District for developments of that size), in a particular location because the owner is willing to sell is not "exceptional".

Policy DS19 is contrary to NPPF paragraph 85 regarding the movement of the green belt boundary. The existing green belt boundary runs along a road/housing edge/ridgeline. WDC propose moving it to a hedgeline further down a hillside. There are no physical features to reinforce this boundary. This can hardly be considered a permanent boundary.

Policy DS19 is contrary to NPPF paragraph 85 in that there is no indication that the boundary will not be moved again at the end of the Plan period: a development masterplan dated July 2013 on the WDC website shows the boundary being breached with a further 17ha being added down the hillside. This supports the view that if this first development is allowed, the rest of the farm land and the historic agricultural buildings will disappear under a housing estate within 30 years. Whilst the masterplan is not within the Local Plan, the landowner and WDC have been in communication for 5 years and if the revised boundary was truly fixed, the landowner might not have gone to the time and financial effort to commission these plans.

Policy DS19 is contrary to NPPF paragraph 88 as WDC has not given any weight to or even appeared to consider the fact that the remaining green belt would be damaged – ie: openness and permanence reduced.

Policy DS19 is contrary to NPPF paragraph 88 because the area of green belt studied in relation to Red House Farm (H04) does not include the SE landscape green belt. The area of green belt (CU3) was parcelled as it is because the consideration was for housing on green belt land between Lillington and Cubbington (E-W landscape), which was later removed from the Local Plan. Plot H04 was included as part of the “fringe” development, but is in fact in a different landscape due to the topography. The rest of the green belt in that landscape wasn’t included in the studies.

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: SA

Paragraph Number: 14

Policy Number:

Policies Map Number:

5. Do you consider the Local Plan is :

- | | | |
|-------------------------------------------|-----|------|
| 5.1 Legally Compliant? | Yes | No |
| 5.2 Complies with the Duty to Co-operate? | Yes | No |
| 5.3 Sound? | Yes | No ✓ |

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

- Positively Prepared: ✓
- Justified: ✓
- Effective: ✓
- Consistent with National Policy: ✓

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

see attached re SA,14

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Correct the mistakes.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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Person ID:

Rep ID:

Representation Form part B7 (continued)

SA OF WARWICK DISTRICT COUNCIL'S PUBLICATION DRAFT LOCAL PLAN - SUSTAINABILITY APPRAISAL REPORT

Paragraph 14

"In particular, Lillington lies within the most deprived 20% of Super Output Areas nationally."

This is wholly incorrect. Lillington is a prosperous residential area of c11,500 which comprises much of the northern part of Leamington Spa.

Warwick District has 86 **Lower** Super Output Areas, of which 18 comprise North Leamington. Of the North Leamington **Lower** Super Output Areas, the parish of Lillington has 11. One **Lower** Super Output Area, Lillington East, has an index of multiple deprivations which puts it in the 10-20% most deprived areas nationally. In June 2013, there were 90 unemployed and claiming Lillington East, a rate of 9.4%.

Each Lower Super Output Area has a population of 1000-2000. Lillington East is 63.6% socially-rented (Warks Observatory figures). Lillington East has roughly 635 dwellings (from Royal Mail data), of which a third are within three blocks of council-owned flats, some of which are in private leasehold occupation. However, taking Lillington as a whole, these flats provide a significant source of 1-2 bedroom accommodation, within a large range of housing types in Lillington. In recent times some of these flats have been used to house tenants who have been evicted in other parts of the county, to house people during the long-term redevelopment of Wood End in Coventry, and to house the "difficult to house". This has contributed to the spike in deprivation statistics for that small area.

The high deprivation indicator for housing is due to two factors (according to Warwickshire Observatory). Firstly, it is due to the high level of housing benefit claimants, which is a direct consequence of low incomes, whose underlying cause is poor education, skills and training and thus poor access to jobs. Secondly, it is due to levels of under-occupancy, probably caused by the settled nature of the community: older parents are remaining in family homes.

The statement in paragraph 14 exaggerates the excuse for building on green belt land at Red House Farm. Building on Red House Farm will not address the underlying needs of Lillington East. It will simply massage the super-output area statistics suitably to reduce the apparent deprivation. That is not "regeneration".

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: SA
Paragraph Number: Section 3.106
Policy Number:
Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes	No
5.2 Complies with the Duty to Co-operate?	Yes	No
5.3 Sound?	Yes	No ✓

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared: ✓
Justified: ✓
Effective: ✓
Consistent with National Policy: ✓

For Official Use Only

Person ID:

Rep ID:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

see attached re SA s. 3.106

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Correct the mistakes.
Remove "Lillingdon regeneration" from the Plan.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

For Official Use Only

Person ID:

Rep ID:

Representation Form part B7 (continued)

SA OF WARWICK DISTRICT COUNCIL'S PUBLICATION DRAFT LOCAL PLAN - SUSTAINABILITY APPRAISAL REPORT

Section 3.106

3.106 The District's relative prosperity masks some significant areas of deprivation. In particular, Lillington lies within the most deprived 20% of Super Output Areas nationally...

This is wholly incorrect. Lillington is a prosperous residential area of c11,500 which comprises much of the northern part of Leamington Spa.

Warwick District has 86 **Lower** Super Output Areas, of which 18 comprise North Leamington. Of the North Leamington **Lower** Super Output Areas, the parish of Lillington has 11. One **Lower** Super Output Area, Lillington East, has an index of multiple deprivations which puts it in the 10-20% most deprived areas nationally. In June 2013, there were 90 unemployed and claiming Lillington East, a rate of 9.4%.

Each Lower Super Output Area has a population of 1000-2000. Lillington East is 63.6% socially-rented (Warks Observatory figures). Lillington East has roughly 635 dwellings (from Royal Mail data), of which a third are within three blocks of council-owned flats, some of which are in private leasehold occupation. However, taking Lillington as a whole, these flats provide a significant source of 1-2 bedroom accommodation, within a large range of housing types in Lillington. In recent times some of these flats have been used to house tenants who have been evicted in other parts of the county, to house people during the long-term redevelopment of Wood End in Coventry, and to house the "difficult to house". This has contributed to the spike in deprivation statistics for that small area.

The high deprivation indicator for housing is due to two factors (according to Warwickshire Observatory). Firstly, it is due to the high level of housing benefit claimants, which is a direct consequence of low incomes, whose underlying cause is poor education, skills and training and thus poor access to jobs. Secondly, it is due to levels of under-occupancy, probably caused by the settled nature of the community: older parents are remaining in family homes.

The statement in paragraph 3.106 exaggerates the excuse for building on green belt land at Red House Farm. Building on Red House Farm will not address the underlying needs of Lillington East. It will simply massage the super-output area statistics suitably to reduce the apparent deprivation. That is not "regeneration".

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: SA
Paragraph Number: section 4.35
Policy Number:
Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes	No
5.2 Complies with the Duty to Co-operate?	Yes	No
5.3 Sound?	Yes	No ✓

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared: ✓
Justified: ✓
Effective: ✓
Consistent with National Policy: ✓

For Official Use Only

Person ID:

Rep ID:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

see attached re SA s.4.35

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Inaccuracies need correcting. Plans should be specific and visible.

Remove Red House Farm from the Local Plan and reinstate original green belt boundary.

Remove "Lillington Regeneration" from the Plan.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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Person ID:

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Representation Form part B7 (continued)

SA OF WARWICK DISTRICT COUNCIL'S PUBLICATION DRAFT LOCAL PLAN - SUSTAINABILITY APPRAISAL REPORT

Section 4.35

...An additional Green Belt site at Red House Farm in the Lillington area was also included to provide an opportunity for the wider regeneration of the locality.

The original inclusion of Red House Farm Land in the Revised Development plan was simply classed as an "urban fringe" development along with other "urban fringe" developments at Warwick and Kenilworth. It was also classified as "greenfield" along with non-greenbelt developments, so its green belt nature could easily have been missed at that point.

The "wider locality" does not require "regeneration" as there is no dereliction, obvious decay, neglect or damage. The roads are tidy, the houses and gardens are generally well-cared for, shopping areas pleasant and public facilities good, with good architecture and intelligent design. There is no graffiti or obvious damage.

Whilst there is a concentration of flats in Lillington East, there is also a variety of maisonettes, two and three bedroom houses, semidetached and terraced, with open grassy areas and wide open spaces. There is a large recreation area, the largest in Leamington Spa apart from Newbold Comyn. the adjacent super-output areas have an integrated range of housing – small blocks of flats, maisonettes, terraces, semis, bungalows arranged together: it is a well-planned estate.

The owner is very willing to sell, given the expected profits on the 11ha run into millions of pounds. Excuses about regeneration are simply a means to justify the use of green belt land. Local councillors and the planning department have been in contact with the owner over the time but not involved residents at all.

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: SA
Paragraph Number: section 5.16
Policy Number:
Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes	No
5.2 Complies with the Duty to Co-operate?	Yes	No
5.3 Sound?	Yes	No <input checked="" type="checkbox"/>

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared:
Justified:
Effective:
Consistent with National Policy:

For Official Use Only

Person ID:

Rep ID:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

see attached re S. 5.16

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Any plans for Crown Way Shops redevelopment should be removed from the Plan as they have not been made public or ~~seen~~ consulted upon, particularly if any public services are to be demolished and if public recreation space is to be lost

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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Representation Form part B7 (continued)

SA OF WARWICK DISTRICT COUNCIL'S PUBLICATION DRAFT LOCAL PLAN - SUSTAINABILITY APPRAISAL REPORT

Section 5.16

5.16 Policy DS17 supports canal-side regeneration and enhancement with the preparation of a canal-side DPD. This along with Policy DS18 which supports the regeneration of the Lillington Local Shopping Centre have the potential for minor long-term positive effects on the economy and employment; however, there is still an element of uncertainty as there are no specific proposals.

This section indicates DS18 of the Local Plan is about Lillington Local Shopping Centre (a misnomer for Crown Way Shops) and confirms there are no specific proposals. Furthermore, there is nothing to suggest there is anything wrong with Crown Way Shops. Having been improved over recent times, there is nothing to suggest that it needs demolition or replacement, or how that could be feasible. It provides a number of flats and maisonettes with businesses and public space below.

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: SA
Paragraph Number: section 5.28
Policy Number:
Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes	No
5.2 Complies with the Duty to Co-operate?	Yes	No
5.3 Sound?	Yes	No ✓

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared: ✓
Justified: ✓
Effective: ✓
Consistent with National Policy: ✓

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Person ID:	

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

see attached re SA s. 5.28

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Take Red House Farm (and Campion Hills recreation ground!) out of the Local Plan and S.A.
Remove "Lillingham regeneration" from the Plan.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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Person ID:

Rep ID:

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination ✓

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It is necessary because there is a lot of misinformation and conjecture to disprove and there are many issues to deal with.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:



Date :

June 27th 2014

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

For Official Use Only

Person ID:

Rep ID:

Representation Form part B7 (continued)

SA OF WARWICK DISTRICT COUNCIL'S PUBLICATION DRAFT LOCAL PLAN - SUSTAINABILITY APPRAISAL REPORT

Section 5.28

...The Red Farm House and Campion Hills allocations were identified as having the potential for a major long-term positive effect on access to community services and facilities and poverty and social exclusion as they are located adjacent to Lillington, the most deprived neighbourhood in the District. Development will help to regenerate the area and bring an improved quality and choice of housing as well as improved local facilities...

1. Campion Hills (recreation ground) site, for 50 houses, was put into the Plan only 6 weeks before it was due to be published. There was **no consultation** about it. It was taken out again at the meeting of the full council to adopt the Plan when it was realised how incredibly unpopular it would be. Hence it is only mentioned here. Campion Hills Recreation Ground is a local beauty spot enjoyed by hundreds of people every day as they walk and cycle through it, play, take exercise, use the BMX track etc. It is green belt as well as an official public recreation area. Travelling fairs and circuses use the site. It stands in a prominent position 90m above Leamington, not in Lillington parish. It has fantastic open views over Warwick and Warwick castle, over Leamington and across to the hills of Warwickshire and as far as Oxfordshire. It is a long way from Lillington's public amenities and from Lillington East. The idea that building houses on such a treasured amenity could improve access to community services in Lillington and reduce poverty and social exclusion in Lillington East is frankly laughable. But this is the standard of argument that Warwick District Council is prepared to use to try to build private houses on green belt. Surely the point of a Sustainability Appraisal is to challenge such assumptions and non-sequiturs.
2. Lillington is NOT the most deprived neighbourhood in the District. Lillington is a prosperous residential area of c11,500 which comprises much of the northern part of Leamington Spa. Some of the most prosperous roads of Leamington are in Lillington parish.
3. Lillington has well-built traditional 1950's council houses with large gardens which have been well-maintained. It has a variety of newer housing of good quality. There is a wide variety of housing, spatially integrated in a well-planned housing estate. Adjacent parts of Lillington have mostly 3-bed semis in private ownership though there larger ones here and there. Building on Campion Hills or Red House farm is simply going to bring 5-bed "executive" homes to areas of Lillington which didn't have them. This is totally unnecessary, and certainly on reason to build on Green Belt.
4. Increasing the population will not improve local facilities. There is no demonstration of how this could happen. The reverse is more likely, that pressure will be increased on local facilities. Local primary schools are already full, and the increase in capacity at Lillington School has not been explained in terms of allocations, so there is no proof that there will be sufficient primary places to cope with increased housing as well as the local changes in demographic profile. Local facilities have been subject to cuts in recent times – which the District Council has little if any control over. In particular, primary healthcare and hospital facilities are not going to change, so increasing the population in the catchments is only going to increase pressure on those facilities.

There is no evidence to the contrary. The only conceivable improvement is an increase in Lillington's library hours. There is no provision for any further community facilities or space to build them. The Council would consider that Leamington's facilities serve Lillington.

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination ✓

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It is necessary because there is a lot of misinformation and conjecture to disprove and there are many issues to deal with.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:



Date :

June 27th 2014

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