
CHAPTER 3: CORE STRATEGY

3.1 Overview

3.1.1 The Core Strategy demonstrates how the Local Plan will contribute towards delivering the joint vision for the District set out in the Community Plan 2001-2003. The objections made are diverse in nature. I recommend a number of modifications to the Spatial Strategy and to certain of the objectives that appear under the broad aims of maintaining high and stable levels of economic growth, effective protection of the environment, prudent use of natural resources, and social progress which recognises the needs of everyone.

3.2 Paragraphs 3.1 - 3.6A Introduction

Objections to First Deposit Version

148/AB	Campaign to Protect Rural England (Warwickshire Branch)
187/AA	The Countryside Agency (West Midlands Region)
193/AP	Coten End and Emscote Residents' Association
193/AQ	Coten End and Emscote Residents' Association
199/AP	James Mackay
199/AQ	James Mackay
302/AA	English Heritage (West Midlands Region)

Objections to Revised Deposit Version

195/RAB	The Leamington Society
242/RAA	Coventry City Council (Planning & Transportation)

Key Issues

- 3.2.1**
- (1) Whether objectives should be afforded equal weight or priority given to protecting the environment, natural resources and amenity.
 - (2) Whether the core strategy should set out the overall approach to the distribution of development.
 - (3) Whether the reference to sustainable development in Paragraph 3.4 should be aligned with that in Paragraph 1.7.
 - (4) Whether the wording of Paragraph 3.6 should follow Government advice more closely, reflecting the 'polluter pays' principle.
 - (5) Whether the core strategy properly reflects the Regional Spatial Strategy.

- (6) Whether the introduction to Chapter 3 should recognise the potential risk of continued urban development.
- (7) Whether the introduction should recognise the Council's commitment to monitoring changes in the District.

Inspector's Appraisal and Conclusions

- 3.2.2 Issue 1:** Paragraph 3.6 explains that the Core Strategy of the Plan attaches equal weight to all objectives. Integrating such objectives is the challenge in achieving sustainable development. It is the role of individual policies in the Plan to seek to balance objectives in the light of all material circumstances. I support this methodology. It follows that it would not be appropriate to give priority to the natural environment and amenity as advocated by CPRE (Warwickshire Branch). I note that there is a close link between the objectives in the Core Strategy, which were amended in the Revised Deposit Plan, and those employed in the Sustainability Appraisal of the Plan.
- 3.2.3 Issue 2:** The concern at First Deposit stage that the Plan should set out the overall approach to the distribution of development has been addressed by inclusion of a Spatial Strategy in the Revised Deposit Plan.
- 3.2.4 Issue 3:** I agree with the District Council that there is no inconsistency between the references to sustainable development in Paragraphs 1.7 and 3.4 of the Plan. The 4 aims that underpin the Core Strategy are identical to those identified by the Government as the basis of sustainable development in PPS1 - that is, to maintain high and stable levels of economic growth, effective protection of the environment, prudent use of natural resources, and social progress which recognises the needs of everyone.
- 3.2.5 Issue 4:** I see no conflict between Paragraph 3.6 of the Plan and sustainable development as promoted in PPS1. The approach taken in the Local Plan is, I believe, on all fours with the aims of sustainable development as set out in Paragraph 5 of PPS1.
- 3.2.6 Issue 5:** The First Deposit version of the Plan was issued prior to the latest version of RPG11 and before it became part of the development plan. The Revised Deposit version addresses this and includes a number of references to the RSS, and its status as part of the development plan, at Paragraphs 1.22-1.23, 3.6B, 3.11, amongst others, and in specific policies such as SSP2 (University of Warwick) and SSP7 (Coventry Airport). Moreover, I note that each of the Topic Papers prepared for this Local Plan inquiry show how the policies of the Plan accord with those of the RSS. I am satisfied that the Core Strategy adequately reflects the Regional Spatial Strategy.
- 3.2.7 Issue 6:** The Leamington Society and other objectors are concerned that the Plan should reflect the relative amounts of urban against rural land in the District and should acknowledge the potential risk of further urban concentration in light of 50 years of development on the peripheries of Warwickshire's main towns. Paragraph 8.4 (Rural Area Policies Chapter) sets out the population and land distribution between urban and rural areas. The Spatial Strategy gives a clear steer as to where new development in the District should be directed. I am satisfied that this Spatial Strategy reflects a sound understanding of the need to foster urban growth in order to maximise sustainability, while satisfying local needs in the countryside.

3.2.8 Issue 7: There is no need, in my view, to specifically indicate in the introduction to the Plan that change will be monitored. This is an on-going activity throughout the life of the Plan. I note that where monitoring is vital to the implementation of a policy (such as Policy SC8a Managing Housing Supply) this is clearly indicated in the text (eg Paragraph 5.41B). To include a general statement to this effect would serve to make the Plan less concise.

Recommendations

3.2.9 That no modifications be made to the Revised Deposit Plan in respect of these objections.

3.3 Paragraphs 3.6B - 3.6F The Spatial Strategy of the Local Plan

Objections to First Deposit Version

None

Objections to Revised Deposit Version

120/RAJ	Miller Homes (West Midlands)
191/RAB	Robin A Richmond
195/RAC	The Leamington Society
222/RAC	John Burman & Family
239/RAM	Mr D Austin
321/RAC	West Midlands International Airport Ltd
322/RAB	J G Land and Estates
349/RAB	Mr. D. G. Goodyear
350/RAC	Tesco Stores Ltd

Key Issues

- 3.3.1**
- (1) Whether Paragraph 3.6E should give greater recognition to those locations where development will be supported in the rural areas.
 - (2) Whether Paragraph 3.6F should be less restrictive with regard to the provision of market housing in the rural areas.
 - (3) Whether the spatial strategy should provide more information on the 'urban expansion' development strategy of the Warwickshire Structure Plan.
 - (4) Whether Whitnash should be referred to as a 'main town' in the spatial strategy.
 - (5) Whether it is appropriate for Paragraph 3.6C to refer to 'all' main shopping development as being within the existing town centres.
 - (6) Whether the spatial strategy is misleading in suggesting that outside the town centres the District is rural.

- (7) Whether the spatial strategy should make reference to Policy GD.3 of the Warwickshire Structure Plan given that this Policy has a limited life and has been superseded by the RSS.

Inspector's Appraisal and Conclusions

- 3.3.2 Issue 1:** The District Council accepts that the spatial strategy should acknowledge that in certain cases controlled growth in the rural areas is appropriate - that is, where development is identified and site specific policies apply. I endorse the changes proposed by the District Council to Paragraph 3.6E and to the unnumbered paragraph between Paragraphs 3.6C and 3.6D. Those amendments go some way towards satisfying the objections made by West Midlands International Airport Ltd. However, I see no reason to add the rest of the wording put forward by the objector. It is sufficient in my view for 'support' for controlled development in the rural areas to be included in Paragraph 3.6E of the explanatory text rather than in the spatial strategy itself. The opportunity should also be taken here to correct the typographical errors in Paragraph 3.6E.
- 3.3.3 Issue 2:** The policy basis for adopting a restrictive approach towards market housing in rural areas is set out in the District Council's Core Topic Paper 10: Rural Areas¹. In brief, the Warwickshire Structure Plan establishes a number of principles. Firstly, growth in rural areas must be restricted in order to direct most development towards urban areas. Secondly, any housing permitted in rural areas must be related to a hierarchy of settlements determined by local plans. Thirdly, housing in rural areas should be provided to meet the needs of local people and any new homes must be supported by evidence that they will help meet that need. Policy RAP2 of the Revised Deposit Local Plan sets out the approach for the District. It provides that any building of new open market housing is restricted to that which meets identified needs within the rural areas and will only be permitted within the 5 largest 'limited growth villages' on previously developed land. This is in the context of a situation where there is already an excess of housing over that required to 2011. In these circumstances, I do not accept that Paragraph 3.6F should be less restrictive.
- 3.3.4 Issue 3:** The approach taken by the Plan's spatial strategy accords with the strategic and regional framework set by the Warwickshire Structure Plan and the West Midlands RSS. It has been confirmed that the Revised Deposit Plan is in general conformity with both (except for the specific case of Policy SSP7 in relation to the RSS). The Local Plan does not have a strategy to expand its present urban area beyond existing commitments and provides for limited growth. I agree with the District Council that to include information about the 'urban expansion' development strategy of the Structure Plan is unnecessary and could potentially mislead.
- 3.3.5** As regards criticisms made of the Annual Monitoring Report 2005, the District Council acknowledges that it lacks information in certain areas including off-street parking. Not all of the core indicators were met because of resource constraints. However, it is anticipated that the content and detail of the Report will improve as new monitoring information becomes available. Its purpose is primarily to demonstrate that the policies of the Plan are being implemented. I accept that this is not a local plan issue as such and not directly relevant to this inquiry.

¹ CD24

- 3.3.6 Issue 4:** Whitnash is officially a town. As it adjoins Leamington Spa I consider it logical to include it as part of the District’s urban area where most new development will be directed. I agree, though, that the reference to Whitnash as a main town is confusing. The Plan would be improved by deleting that word from the spatial strategy, as conceded by the Council.
- 3.3.7 Issue 5:** I note that the wording of Paragraph 3.6C closely follows that of Structure Plan Policies TC.1 and TC.2. These Policies indicate that all main shopping, entertainment and leisure development should be located in town centres. I see no reason to amend the text which reflects the thrust of national planning policy guidance.
- 3.3.8 Issue 6:** The spatial strategy does not imply that outside the town centre boundaries the rest of the District is rural in character. It firstly establishes the principle that most development will be directed to the 4 towns, and then indicates that the centres of the 3 largest towns will be the main shopping and service foci. The strategy then goes on to state that the remainder of the District is defined as rural (that is, will be regarded as rural for policy purposes) where development will generally be provided only to meet the needs of the local population and to support rural communities. I consider this to be appropriate. In my opinion no amendment of the text is warranted.
- 3.3.9 Issue 7:** Under the provisions of the Planning and Compulsory Purchase Act 2004 the Warwickshire Structure Plan only has life as ‘saved’ policy until September 2007. However, I note that in relation to the towns of Warwick District the Structure Plan and the RSS are essentially at one. Leamington Spa is defined in the RSS as an ‘other large settlement’ and Warwick and Kenilworth can reasonably be classified as ‘market towns’. There are no other RSS towns in the District that would fall into either category. The approach of the RSS in directing new development to those locations is similar to Structure Plan Policy GD.3. Consequently, the principles embodied in that Policy will have a life beyond that of the ‘saved’ Structure Plan. In these circumstances, I see no harm in maintaining that reference in the Plan’s spatial strategy.

Recommendations

- 3.3.10 (a) That the Revised Deposit Plan be modified as follows:**
- (i) delete the word “main” from the reference to the ‘...four main towns of the District...’ in the unnumbered paragraph between Paragraphs 3.6A and 3.6B.**
 - (ii) add the wording “except where development is identified and site specific policies apply” after the words ‘...rural communities,’ in the unnumbered paragraph between Paragraphs 3.6C and 3.6D.**
 - (iii) add the wording “and where appropriate, support development within” after the word ‘control’ in Paragraph 3.6E.**
 - (iv) correct the typographical errors in Paragraph 3.6E by substituting the word “these” for ‘there’ and the word “region’s” for ‘region’.**
- (b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.**

3.4 Paragraphs 3.7 - 3.9 The Core Strategy of the Local Plan. Objective 1A: To maintain high levels of economic growth. (Paragraph 3.9 was originally numbered Objective 1B)

Objection to First Deposit Version

256/AD T & N Limited

Objections to Revised Deposit Version

66/RAC The Warwick Society
191/RAC Robin A Richmond
195/RAD The Leamington Society
349/RAC Mr. D. G. Goodyear
350/RAD Tesco Stores Ltd

Key Issues

- 3.4.1** (1) Whether the objective should be reconciled with social and environmental objectives.
- (2) Whether it is appropriate for Paragraph 3.7 to make reference to employment land within the District meeting the needs of in-migrants as well as the resident population
- (3) Whether it should be recognised that other sectors, such as retailing, can contribute to economic growth.

Inspector's Appraisal and Conclusions

- 3.4.2 Issue 1:** It is clear from Paragraph 3.6 that the objectives of the Plan should be read as a whole, and integrated and balanced. Wherever possible, duplication should be avoided to ensure a succinct document. Since it is implicit in all of the objectives that economic, social and environmental factors need to be reconciled, I see no reason to amend the text.
- 3.4.3 Issue 2:** I note that SP Policy GD.1 includes an element of in-migration in the employment figures calculated for Warwickshire. Consequently, I accept that the statement made in Paragraph 3.7 of the Local Plan is factually correct.
- 3.4.4 Issue 3:** Because Objective 1A is concerned principally with setting the context for meeting the need for employment land identified in the Structure Plan, I accept that the focus here should be as indicated. It is recognised elsewhere through Objectives 1B, 1D and 1F that other sources of employment - namely rural development, retail/other town centre uses, and tourism - also contribute to economic growth.

Recommendations

3.4.5 That no modifications be made to the Revised Deposit Plan in respect of these objections.

3.5 Paragraph 3.10 The Core Strategy of the Local Plan. Objective 1B: To promote and enhance vibrant rural communities. (Originally numbered Objective 1C)

Objections to First Deposit Version

193/AR Coten End and Emscote Residents' Association
199/AR James Mackay

Objections to Revised Deposit Version

222/RAD John Burman & Family
224/RAB Mr and Mrs R M Orr

Key Issue

3.5.1 Whether the objective of promoting and enhancing vibrant rural communities conflicts with the overriding aim of achieving sustainable development, by dispersing employment and increasing the need for car travel.

Inspector's Appraisal and Conclusions

3.5.2 The Plan's approach towards development in rural areas, set out in the spatial strategy, is to generally restrict new development in open countryside while supporting local communities, helping meet local needs and assisting farmers through well-conceived farm diversification projects. It seeks to maintain an appropriate balance between the needs of farming, the rural population and protection of the countryside. I see no inconsistency between this approach and the overriding aim of achieving sustainable development.

Recommendations

3.5.3 That no modifications be made to the Revised Deposit Plan in respect of these objections.

3.6 Paragraphs 3.11 - 3.12 The Core Strategy of the Local Plan. Objective 1C: To meet the housing needs of the whole community to 2011. (Originally numbered Objective 1D)

Objections to First Deposit Version

66/AE	The Warwick Society
117/AC	Langstone Homes Ltd
120/AB	Miller Homes (West Midlands)
132/AA	KB Benfield Group Holdings Ltd
170/AE	Mr Martin Wood
200/AN	Taylor Woodrow Strategic Developments
201/AN	Home Builders Federation
228/AD	West Midlands RSL Planning Consortium
239/AJ	Mr D Austin
240/AD	George Wimpey Strategic Land
256/AE	T & N Limited
263/AA	Christopher Wilson

Objections to Revised Deposit Version

66/RAD	The Warwick Society
119/RAB	Bloor Homes Ltd
120/RAH	Miller Homes (West Midlands)
191/RAD	Robin A Richmond
195/RAE	The Leamington Society
214/RAB	Mrs J Biles
223/RAA	Kenilworth Town Council
239/RAL	Mr D Austin
322/RAC	J G Land and Estates
349/RAD	Mr. D. G. Goodyear

Key Issues

- 3.6.1**
- (1) Whether sites should be allocated for housing development rather than reliance being placed entirely on windfalls to meet the Structure Plan target.
 - (2) Whether the objective should allow the Structure Plan target to be exceeded only by affordable housing.
 - (3) Whether the housing land situation should be updated.
 - (4) Whether objective 1C should include a reference to protecting established residential areas and discourage the demolition of properties that add to the character of such areas.
 - (5) Whether a target for affordable housing should be integrated into objective 1C.
 - (6) Whether the Plan should make provision for a 10 year supply of land for housing and identify sites to 2016 or beyond.
 - (7) Whether this objective should be reconciled with social and environmental objectives.
 - (8) Whether Paragraph 3.12 should be deleted following approval of the SPD 'Managing Housing Supply'.
 - (9) Whether the word 'acceptable' should be deleted from Paragraph 3.12 because it

would encourage unnecessary development.

- (10) Whether the Plan should include a specific policy that confirms the District Council's commitment to meeting its strategic housing requirement, with the relevant figures set out in the main body of the Plan.

Inspector's Appraisal and Conclusions

- 3.6.2 Issue 1:** The Structure Plan target has been superseded by the housing requirements set out in the Regional Spatial Strategy. I am satisfied for reasons given in my Appraisal and Conclusions on the key issues discussed at the Round Table Session on Managing Housing Supply² that there is no need for specific housing allocations to be made to meet these requirements or to renew any allocations from the 1995 Local Plan. It is sufficient, in my view, to rely on commitments and windfall sites coming forward. These will provide adequate choice. Replacement Appendix 2 included in the Council's Proposed Changes³ sets out how the strategic requirement has been met. Paragraph 3.11 of the Plan's supporting text does, though, need to be amended to correct a typographical error and to reflect more up-to-date monitoring information available at April 2005.
- 3.6.3 Issue 2:** The RSS establishes a maximum figure for new housing that should be applied to the District for the period to 2021. To significantly exceed that requirement would undermine the broader planning and housing strategy of the Structure Plan and the RSS. With this in mind the Council has adopted for development control purposes a Supplementary Planning Document 'Managing Housing Supply'⁴. This severely restricts windfall housing in the urban areas to bring supply into line with requirements. It does, however, allow solely affordable housing proposals to continue to come forward in view of the urgent needs of the community in this regard. I consider this to be appropriate.
- 3.6.4 Issue 3:** The Revised Deposit Plan updated the housing land situation in relation to the First Deposit Plan by employing the (then) most up-to-date figures from April 2004. Replacement Appendix 2 in the District Council's Proposed Changes further updates those figures using information gleaned from the 2005 monitoring returns. It also takes into account latest Government advice and demonstrates how the strategic requirements have been satisfied. I am content that these actions meet the objection.
- 3.6.5 Issue 4:** As the Council points out, objective 1C is focused on meeting housing needs under Aim 1 (To Maintain High and Stable Levels of Economic Growth). Other objectives of the Plan, particularly those under Aim 2 (Effective Protection of the Environment) seek to protect amenity and the character of areas. In my view that is the most appropriate location to ensure that environmental safeguards are in place. I am satisfied generally that the Plan provides an appropriate level of safeguarding of established residential areas through Policies DP1, DP2 and DP3, and, in respect of listed buildings and conservation areas, through Policies DAP6-12.
- 3.6.6 Issue 5:** I note that the request for a target for affordable housing be integrated into objective 1C has been met by a cross reference to objective 4A (To make housing affordable and available to everyone) in the Revised Deposit Plan.

² See Paragraphs 5.12.1-5.12.27

³ CD28

⁴ CD202

- 3.6.7 Issue 6:** This issue was discussed at the Round Table Session on Managing Housing Supply. My conclusion is that 2011 is the appropriate Plan period. Beyond 2011 the housing requirement is uncertain. The process of disaggregating and reviewing the housing figures in the RSS has not yet been undertaken and there is no certainty as to what the District's requirement will be up to 2016. Nevertheless, to the extent that the housing requirement is known at the moment, Core Topic Paper 2: Housing⁵ demonstrates that reliance on commitments and windfalls will continue to bring forward sufficient sites to meet the general level of requirements to 2016, and even to 2021. In these circumstances, I see no need to make allocations beyond 2011 or to reserve sites to meet longer-term housing needs. This Plan has a short shelf life. I note that work will commence on a Core Strategy DPD in 2007/8. That DPD and any subsequent Allocations DPD will be able to take full account of emerging housing requirements to 2026 at District level resulting from the RSS Phase Two Review and the new housing projections.
- 3.6.8 Issue 7:** In drafting the Plan the District Council says that a number of principles were followed. One of these was to simplify and slim down the document by avoiding duplication. Another was that the Plan should be read as a whole. Paragraph 3.6 makes it clear that the objectives identified under each aim of the core strategy are intended to complement each other as far as possible although it recognises there is potential for conflict. It confirms that those objectives should be read together and that they should be integrated and balanced. It is implicit, therefore, that economic, social and environmental objectives need to be reconciled. I agree with the planning authority that it is unnecessary to make any further reference to this point in the supporting text.
- 3.6.9 Issue 8:** I concur with the District Council that Paragraph 3.12 should be retained in the Revised Deposit Plan. While the SPD 'Managing Housing Supply' is currently in force, severely restricting urban windfalls, there is no certainty that it will endure for the life of the Plan. It is possible that the position will change before 2011. The final sentence of Paragraph 3.12 properly explains that the District Council will continue to monitor progress towards achieving the objective of meeting the housing needs of the whole community to 2011.
- 3.6.10 Issue 9:** Kenilworth Town Council argues that use of the word 'acceptable' in Paragraph 3.12, which clarifies what is meant by windfall proposals on previously developed land in urban areas, is inappropriate because it could encourage unnecessary development harmful to established residential areas in particular. I do not agree. In considering whether to grant planning permission I believe the planning authority would examine all relevant planning policies and other material considerations.
- 3.6.11 Issue 10:** The Home Builders' Federation argues that the Plan should contain a specific policy confirming the Council's commitment to meeting its strategic housing requirement. The relevant figures should, they say, be clearly identifiable and transparent and be incorporated within the main body of the Plan rather than in an Appendix. I do not consider this to be necessary. Under objective 1C the District Council makes it quite clear that it will provide for the release of sufficient land to meet the strategic housing requirement as set out in Appendix 2. This is, in my opinion, sufficient. As regards the housing requirement/supply figures, I support the Council's approach of slimming down the Plan and separating technical/statistical information from the main text by including

⁵ CD16

such information as an Appendix. It carries equal weight to the rest of the Plan and makes it easier, in my judgement, for the user to understand the document.

Recommendations

3.6.12 (a) That the Revised Deposit Plan be modified as follows:

substitute the following text for the last 2 sentences of Paragraph 3.11:

“It includes need for affordable as well as market housing (see objective 4A). Appendix 2 of the Local Plan identifies the current and forecast supply of dwellings at April 2005.”

(b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.

3.7 Paragraph 3.13 The Core Strategy of the Local Plan. Objective 1D: To enhance the vitality of town centres. (Originally numbered Objective 1E)

Objection to First Deposit Version

228/AE West Midlands RSL Planning Consortium

Objections to Revised Deposit Version

191/RAE Robin A Richmond
195/RAF The Leamington Society
283/RAA The Ancient Monuments Society

349/RAE Mr. D. G. Goodyear
350/RAE Tesco Stores Ltd

Key Issues

- 3.7.1** (1) Whether mention should be made of the use of upper floors for affordable housing in town centres.
- (2) Whether the objective should also refer to the ‘viability’ of town centres.
- (3) Whether this objective should be reconciled with social and environmental objectives.
- (4) Whether the core strategy should make specific reference to the special historic character of each of the town centres.

Inspector's Appraisal and Conclusions

- 3.7.2 Issue 1:** I agree with the District Council that in seeking to give a broad overview of Plan priorities it would be inappropriate for objectives of the core strategy to go into this level of detail. In any event, Policies TCP11 and TCP12 provide support for the use of upper floors in town centres for housing.
- 3.7.3 Issue 2:** I note that the wording of this objective was amended between the First and Revised Deposit versions of the Plan to give greater consistency between the core strategy and the objectives of the Sustainability Appraisal. However, together with vitality, ‘viability’ is one of the key considerations in the health of town centres. This is recognised in Paragraph 6.15 of the Plan and elsewhere. To more accurately reflect the advice in PPS6 I consider that the objective would be improved by re-introducing the word ‘viability’.
- 3.7.4 Issue 3:** The Leamington Society and Messrs Richmond and Goodyear have objected to a number of the core strategy objectives on the grounds that they should be reconciled with social and environmental objectives. However, Paragraph 3.6 makes it clear that all of the objectives need to be read together, integrated and balanced. There is no requirement, in my view, to make explicit reference to the need for reconciliation.
- 3.7.5 Issue 4:** Elsewhere the Plan makes reference to the specific character of each of the town centres, while Objective 2C refers to protecting and enhancing the historic environment. In these circumstances, I see no case for the core strategy duplicating this information. A further reference here would only add to the bulk of the Plan, defeating the intention of producing a focused slimmed-down document.

Recommendations

- 3.7.6 (a) That the Revised Deposit Plan be modified as follows:**
- substitute the following wording for Objective 1D:**
- “To enhance the vitality and viability of town centres”**
- (b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.**

3.8 Paragraph 3.14 The Core Strategy of the Local Plan. Objective 1E: To promote the regeneration of deprived areas. (Originally numbered Objective 1F)

Objection to First Deposit Version

No objections

Objections to Revised Deposit Version

191/RAF	Robin A Richmond
195/RAG	The Leamington Society
349/RAF	Mr. D. G. Goodyear

Key Issue

- 3.8.1** Whether this objective should make reference to the need to protect the quality of the environment.

Inspector's Appraisal and Conclusions

- 3.8.2** I consider this to be unnecessary. The aim of protecting the environment is implicit across all of the objectives. Moreover, objectives 2A-2E under Aim 2 focus on 'Effective Protection of the Environment'.

Recommendations

- 3.8.3** That no modifications be made to the Revised Deposit Plan in respect of these objections.

- 3.9** **Paragraph 3.15 The Core Strategy of the Local Plan. Objective 1F: To promote sustainable tourism. (Originally numbered Objective 1G)**

Objections to First Deposit Version

154/AB National Farmers' Union
168/AB Advantage West Midlands
196/AH The National Trust

Objection to Revised Deposit Version

66/RAE The Warwick Society

Key Issues

- 3.9.1** (1) Whether the Plan properly reflects an understanding of 'sustainable tourism'.
(2) Whether it is clear how this objective will be achieved.
(3) Whether it is reasonable to require tourism-related development in rural areas to be accessible by public transport.
(4) Whether Paragraph 3.15 should make specific reference to modes of transport other than the car.

Inspector's Appraisal and Conclusions

- 3.9.2** **Issue 1:** Paragraph 3.15 was amended in the Revised Deposit Plan to explain what is meant by the term 'sustainable tourism'. I endorse those amendments which satisfy the concerns expressed by the National Trust. I note that on this basis the objection has been conditionally withdrawn.

3.9.3 Issue 2: Achievement of this objective will clearly be through Plan policies that relate specifically to tourism related development. They include Policies UAP7 (Directing New Tourism Development), UAP8 (Directing New Visitor Accommodation – urban areas), and RAP16 (Directing New Visitor Accommodation – rural areas).

3.9.4 Issue 3: The District Council recognises that it may not be feasible for all tourism-related development in rural areas to be accessible by public transport. The wording of Paragraph 3.15 of the Revised Deposit Plan reflects this by indicating that ‘tourism related proposals should, wherever possible, be accessible by various transport modes’.

3.9.5 Issue 4: The reference to ‘various transport modes’ in Paragraph 3.15 of the Revised Deposit Plan also addresses the objection that the text should make specific mention of modes of transport other than the car.

Recommendations

3.9.6 That no modifications be made to the Revised Deposit Plan in respect of these objections.

3.10 Paragraphs 3.16 - 3.17 The Core Strategy of the Local Plan. Objective 2A: To protect and improve land quality

Objections to First Deposit Version

1/AA	Warwickshire Wildlife Trust
117/AD	Langstone Homes Ltd
120/AC	Miller Homes (West Midlands)
150/AA	Warwickshire County Council (Museum Field Services - Ecology)
200/AM	Taylor Woodrow Strategic Developments
210/AA	English Nature
239/AL	Mr D Austin

Objections to Revised Deposit Version

191/RAG	Robin A Richmond
195/RAH	The Leamington Society
302/RAA	English Heritage (West Midlands Region)
349/RAG	Mr. D. G. Goodyear

Key Issues

- 3.10.1** (1) Whether there is also a need to bring forward greenfield sites as well as previously developed land.
- (2) Whether the text should include a definition of previously developed land.

- (3) Whether, in bringing forward brownfield sites, acknowledgement should be made of the need to protect land of nature conservation value.
- (4) Whether Paragraph 3.16 should refer to land of historic as well as nature conservation value.
- (5) Whether Paragraph 3.16 should be amended to reflect the ‘urban expansion’ option favoured by the Warwickshire Structure Plan.
- (6) Whether the phrase ‘making best use’ should be substituted for ‘maximising the use’ (of previously developed land) in Paragraph 3.16.

Inspector's Appraisal and Conclusions

3.10.2 Issue 1: I am satisfied, for reasons set out elsewhere in my report, that there is no need in this Plan to identify greenfield land for development, be it for housing or employment. Nevertheless, Objective 2A does not preclude the use of greenfield sites in appropriate circumstances where, for example, the need for development could not be met on previously-developed land.

3.10.3 Issues 2, 3 and 4: A definition of previously developed land was included in Paragraph 3.16 of the Revised Deposit Plan through a cross-reference to PPG3. On that basis the objection by Warwickshire Wildlife Trust has been withdrawn. Although the definition makes reference to land of ecological value I note that the District Council considered it helpful to clarify the matter further through another amendment to Paragraph 3.16 which has also been incorporated into the Revised Deposit Plan. This addresses Issue 3. As regards Issue 4, the District Council has put forward an additional proposed change that makes reference to land that is of historic interest. Again, that objection is satisfied. I support all of those amendments.

3.10.4 Issue 5: In the context of Warwick District and the levels of growth projected for this Local Plan to 2011, I do not believe it necessary or appropriate for Objective 2A to refer to the balanced ‘urban expansion’ strategy of the Warwickshire Structure Plan. The Local Plan does not have a strategy to expand its present urban area beyond existing commitments. The Revised Deposit Plan’s approach has, I note, been accepted as being in general conformity with both the RSS (except for Policy SSP7 – Coventry Airport) and the Structure Plan.

3.10.5 Paragraph 3.17 sets out the position at 2004 in relation to the Structure Plan’s indicative minimum targets for the percentage of new housing and industry on previously developed urban land/buildings. These figures should be updated according to the latest monitoring information available.

3.10.6 Issue 6: I do not consider that the alteration to the text suggested by the Leamington Society is necessary. Objective 2A that it supports should be read alongside other objectives of the Plan. In any event, the following sentence in Paragraph 3.16 goes on to say that the District Council “will support proposals which re-use vacant previously developed land and which make the best use of such land for development (subject to protecting land which is of nature conservation value in accordance with other policies of this Local Plan).”

Recommendations

3.10.7 (a) That the Revised Deposit Plan be modified as follows:

- (i) substitute the following for the second sentence of Paragraph 3.16:

“We will support proposals which re-use vacant previously developed land and which make the best use of such land for development (subject to protecting land which is of nature conservation value or historic interest in accordance with other policies of this Local Plan).”

- (ii) substitute the following for the second sentence of Paragraph 3.17:

“Appendices 1 and 2 of the Local Plan identify the position in relation to these targets at 2005.”

- (iii) update Appendices 1 and 2 to a base date of 2005.

- (b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.

3.11 Paragraphs 3.18 - 3.19 The Core Strategy of the Local Plan. Objective 2B: To protect and enhance the natural environment

Objections to First Deposit Version

1/AB	Warwickshire Wildlife Trust
150/AB	Warwickshire County Council (Museum Field Services - Ecology)
210/AB	English Nature
226/AA	Environment Agency

Objections to Revised Deposit Version

150/RAA	Warwickshire County Council (Museum Field Services - Ecology)
226/RAB	Environment Agency
350/RAF	Tesco Stores Ltd

Key Issues

- 3.11.1** (1) Whether the objective should embrace wider environmental concerns such as sustainable drainage systems, soil quality and dereliction.
- (2) Whether the objective should include reference to geological and geomorphological features.
- (3) Whether the objective should include reference to opportunities for off-site compensation, in addition to mitigation measures.
- (4) Whether it is appropriate to both protect and enhance landscape character.

- (5) Whether compensation should only be sought where on-site mitigation is not possible.

Inspector's Appraisal and Conclusions

- 3.11.2 Issue 1:** Because there is overlap between objectives, I am satisfied that many of the wider environmental concerns identified are adequately addressed through other objectives of the core strategy. The District Council cites the example of objective 3C which seeks to ensure the prudent use of scarce resources and to limit and reduce the impacts of climate change. Paragraph 3.18 has, I note, been amended in the Revised Deposit Plan to strengthen and clarify objective 2B. Additional informal changes have also been put forward by the District Council.
- 3.11.3 Issue 2:** The Revised Deposit Plan includes a reference to 'geological' features while the subsequent proposed changes add 'geomorphological' features to the list of matters that will be protected from inappropriate development.
- 3.11.4 Issue 3:** Paragraph 3.19 has also been amended in the Revised Deposit Plan to include a high standard of mitigation and/or off-site compensation. This meets the objections from English Nature and Warwickshire Wildlife Trust. I endorse those amendments.
- 3.11.5 Issue 4:** I also support the other minor drafting changes to Paragraph 3.18 proposed by the District Council. In my view, it is clearer and more meaningful to firstly protect landscape character, geological/geomorphological features, and wildlife habitats and species of value, and then to follow that statement with the additional aim, wherever possible, of enhancing all of those assets.
- 3.11.6 Issue 5:** I accept that there could be cases where mitigation and/or off-site compensation measures are required. This would be permissible under Development Policies DP2 (Amenity) and DP3 (Natural and Historic Environment and Landscape). I consider therefore that the wording of the first sentence of Paragraph 3.19 is appropriate.

Recommendations

- 3.11.7 (a) That the Revised Deposit Plan be modified as follows:**
- substitute the following for the final sentence of Paragraph 3.18:**
- “We will therefore protect the landscape character, geological/geomorphological features and wildlife habitats and species of value and acknowledged national, regional or local importance from inappropriate new development in urban and rural locations. We will aim, wherever possible, to enhance all of these assets.”**
- (b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.**

3.12 Paragraphs 3.20 - 3.21 The Core Strategy of the Local Plan. Objective 2C: To protect and enhance the historic environment.

Objections to First Deposit Version

122/AF	Warwick Castle
149/AA	Warwickshire County Council (Museum Field Services - Archaeology)
189/AB	Warwickshire Gardens Trust
193/AU	Coten End and Emscote Residents' Association
195/AA	The Leamington Society
199/AU	James Mackay
221/AA	Kenilworth Society
223/AD	Kenilworth Town Council
302/AD	English Heritage (West Midlands Region)

Objections to Revised Deposit Version

66/RAF	The Warwick Society
122/RAE	Warwick Castle
154/RAA	National Farmers' Union
302/RAB	English Heritage (West Midlands Region)

Key Issues

- 3.12.1** (1) (a) Whether objective 2C should reflect the broader definition of the historic environment and include both designated and non-designated sites and areas.
(b) Whether Paragraph 3.20 should refer to 'buildings and other structures'.
- (2) Whether objective 2C should make explicit reference to buildings owned by Warwick District Council.
- (3) Whether the Plan should be more supportive towards the use of Article 4 Directions and Conservation Area Statements.
- (4) Whether objective 2C is supported by adequate Plan policies.
- (5) Whether reference should be made to archaeological sites.
- (6) Whether objective 2C should include a more positive statement about the role of tourism in protecting the historic environment.
- (7) Whether reference should be made to protection and conservation.

Inspector's Appraisal and Conclusions

- 3.12.2 Issue 1:** In responding to the First Deposit Plan, English Heritage said: "...there is also an increasing recognition at all levels of the value and importance of wider aspects of the historic environment that do not benefit from any statutory protection, but are integral to people's quality of life and in creating a sense of place and local identity. As a reflection of this and the rich and diverse heritage of the District, it is recommended that

the text is expanded to foster a wider definition and interpretation of the historic environment beyond statutorily protected sites and features.” The District Council accepts that a reference to both designated and non-designated sites and areas is appropriate. The amended wording of Paragraph 3.20 in the Revised Deposit Plan reflects this. The objections of English Heritage and Kenilworth Town Council on this point have, in consequence, been conditionally withdrawn. I note that a subsequent proposed change put forward by the District Council alters the final sentence of Paragraph 3.20 to clarify that objective 2C relates to ‘buildings and other structures’ and ‘non-designated aspects’. I support those amendments, with the addition of the word ‘area’. It follows that I reject the counter-argument made by the National Farmers’ Union.

3.12.3 Issue 2: The policies of this Plan apply to all land and buildings regardless of ownership. In my view, it would be inappropriate to make explicit reference to property owned by the District Council. I agree with the planning authority that any commitment to maintenance should properly be made through other Council documents such as the Corporate Strategy and Community Plan.

3.12.4 Issue 3: The use of Article 4 Directions to restrict ‘permitted development’ rights is addressed through Paragraph 9.41 of the reasoned justification to Policy DAP10 (Protection of Conservation Areas). I consider that to be the best place for such a reference rather than in support of objective 2C. As regards Conservation Area Statements, I note that the District Council has provided replacement text in Paragraph 9.44 of the Revised Deposit Plan, again in support of Policy DAP10. This indicates that: “The Council is committed to the periodic review of the District’s Conservation Areas and is in the process of preparing Conservation Area Statements.” I support that revision.

3.12.5 Issue 4: I concur with the planning authority that this objection does not concern objective 2C as such but relates instead to the adequacy of policies that follow in the Plan. I shall address these in due course in response to specific objections.

3.12.6 Issue 5: The District Council agrees that a stronger reference to measures that will be taken to protect archaeological sites and features would be helpful. I note that additional text has been suggested by the County Archaeologist. Some of that wording has now been incorporated into Paragraph 3.20 and other elements into Policy DP4 (Archaeology) of the Revised Deposit Plan. In consequence, this objection has been conditionally withdrawn. I support those amendments.

3.12.7 Issue 6: I note that there is already an objective (1F) supporting sustainable tourism which recognises its importance to the economy and the role it plays in the upkeep and use of historic properties. I consider that no further reference is required.

3.12.8 Issue 7: The District Council accepts that although ‘conservation’ is implied in Paragraph 3.21, a specific reference to conservation as well as protection would assist in Paragraph 3.20. I support that Proposed Change.

Recommendations

3.12.9 (a) That the Revised Deposit Plan be modified as follows:

(i) substitute the following text for the first sentence of Paragraph 3.20:

“We recognise our responsibility to protect and conserve the historic environment for current and future generations.”

- (ii) **substitute the following text for the last sentence of Paragraph 3.20:**

“Furthermore, we recognise that the historic environment includes both designated and non-designated areas, buildings and other structures and we will ensure that appropriate protection is given to non-designated aspects.”

- (b) **That no further modifications be made to the Revised Deposit Plan in respect of these objections.**

3.13 Paragraph 3.22 The Core Strategy of the Local Plan. Objective 2D: To maintain and enhance the quality of landscapes and townscapes

Objection to First Deposit Version

54/AC Conservative Group, Warwick District Council

Objection to Revised Deposit Version

No objections

Key Issue

- 3.13.1** Whether a ‘one size fits all’ approach is being taken to protecting the character and setting of towns and villages.

Inspector's Appraisal and Conclusions

- 3.13.2** I do not discern a blanket approach to maintaining/enhancing the quality of landscapes and townscapes in the District. This objective, as amended in the Revised Deposit Plan to reflect its reworded Sustainability Appraisal definition, pays particular attention to local issues of distinctiveness, separate identity and individual character. I note that the objective is supported by Kenilworth Town Council, the Kenilworth Society and English Heritage. I endorse the objective and its supporting text.

Recommendations

- 3.13.3 That no modifications be made to the Revised Deposit Plan in respect of this objection.**

3.14 Paragraphs 3.23 - 3.24 The Core Strategy of the Local Plan. Objective 2E: To promote excellence in sustainable design and enhance the built environment

Objections to First Deposit Version

148/AC Campaign to Protect Rural England (Warwickshire Branch)
189/AC Warwickshire Gardens Trust

Objection to Revised Deposit Version

350/RAH Tesco Stores Ltd

Key Issue

3.14.1 Whether excellence in design could be construed as unachievable and should be replaced by the term ‘good design’.

Inspector's Appraisal and Conclusions

3.14.2 Aiming to achieve excellence in design is an appropriate aspiration. However, national planning policy advice in PPS1 talks of good design with high quality and inclusive design being the object of all those involved in the development process. Local Plan Policy DP1 itself indicates that development will only be permitted which positively contributes to the character and quality of its environment through good layout and design. It does not demand excellence which, in my view, is too high a requirement. As suggested by Tesco Stores Ltd, this could be seen as setting an unachievable objective. Consequently, while I acknowledge the intent of Government to improve the standard of design in the built environment and the role of CABE ‘to create places that are beautiful, safe, and efficient to run’, I consider that the references made in the supporting text to excellence should be replaced by the term ‘good design’. It follows that I do not support the position of CPRE (Warwickshire Branch) despite its objection being conditionally withdrawn. I accept that good design does not focus solely on easily measurable aspects but extends to more subjective and less easily assessed matters such as quality of design. I am satisfied that the policies of the Local Plan, particularly DP1, RAP3, DAP6, DAP9-11 and DAP13, seek to achieve this.

Recommendations

3.14.3 (a) That the Revised Deposit Plan be modified as follows:

(i) amend objective 2E to read:

“To promote high quality sustainable design and enhance the built environment”

(ii) replace the words ‘excellent design’ in line 6 of Paragraph 3.23 and line 1 of Paragraph 3.24 with the words “good design”

(b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.

3.15 Paragraphs 3.25 - 3.26 The Core Strategy of the Local Plan. Objective 3A: To reduce the need to travel.

Objections to First Deposit Version

117/AA	Langstone Homes Ltd
154/AC	National Farmers' Union
191/AC	Robin A Richmond
193/AW	Coten End and Emscote Residents' Association
199/AW	James Mackay
239/AN	Mr D Austin

Objections to Revised Deposit Version

191/RAH	Robin A Richmond
195/RAJ	The Leamington Society
321/RAD	West Midlands International Airport Ltd
349/RAH	Mr. D. G. Goodyear
350/RAG	Tesco Stores Ltd

Key Issues

- 3.15.1** (1) Whether recognition should be made of the requirement for additional development to meet the needs of rural areas.
- (2) Whether the objective should acknowledge that farm and rural diversification projects cannot necessarily be sited on public transport routes.
- (3) Whether objective 3A is adequately supported by Plan policies and the explanatory text.
- (4) Whether there should be criteria for measuring the impact of development upon those living in town centres given the core strategy of concentrating development into the District's major towns.
- (5) Whether Paragraph 3.25 should recognise that greenfield development on the edge of the urban areas might provide greater environmental benefits in terms of travel savings.
- (6) Whether the objective is inconsistent with PPS6 which states that development should be accessible by a choice of means of transport.
- (7) Whether, in seeking to reduce the need to travel, the provision of additional travel facilities (eg regional airports, parkway railway stations) can help minimise use of the private car.

Inspector's Appraisal and Conclusions

- 3.15.2 Issue 1:** Objective 1B is to promote and enhance vibrant rural communities. The Plan goes on to incorporate policies to meet needs in rural areas. The District Council has accepted, though, that it would be helpful to include a specific reference to rural areas under Objection 3A to acknowledge the distinctive issues they face. I endorse the additional text included at Paragraph 3.25 of the Revised Deposit Plan.
- 3.15.3 Issue 2:** I agree with the planning authority that the point made by this objector, although recognised, relates more to the issue of offering alternatives to the private car than to reducing the need to travel. It is covered by objective 3B (To promote the use of more sustainable travel options).
- 3.15.4 Issue 3:** Although there is no specific policy to directly implement this objective, the Plan needs to be read as a whole. When this is done, many of its policies come together to achieve objective 3A. In its response to this objection the District Council points out that the Plan's spatial strategy focuses development on the urban areas, with the Rural Area Policies (RAP1-16) complementing this by limiting growth in the countryside to meeting local needs and supporting rural communities. With this in mind, I see no need for an additional policy or for strengthening existing policies.
- 3.15.5 Issue 4:** I am satisfied that the Plan contains policies to control the impact of growth and development upon those living in town centres in terms of residential amenity and the adequacy of local infrastructure. Those policies incorporate relevant criteria to guide development in these and other sustainable urban locations.
- 3.15.6 Issue 5:** Both national and strategic planning policy seek to focus development on the urban areas, and previously developed land in particular, in order to reduce the need to travel, minimise land-take, and ensure sustainability. Given the character of the District and the circumstances that prevail at the present time which are likely to remain for the rest of the Plan period, the District Council is not promoting any greenfield sites for housing or employment. I am content that this is an appropriate policy approach.
- 3.15.7 Issue 6:** I agree with the District Council that there is no inconsistency in seeking to reduce the overall need to travel and the statement made in PPS6 (Planning for Town Centres) that development should be accessible by a choice of means of transport. The latter is effectively a sub-set of the former.
- 3.15.8 Issue 7:** Objective 3A is about reducing the overall need to travel in the interests of sustainability. West Midlands International Airport Ltd consider that this matter needs to be addressed on both a micro and macro scale. The objective as currently written seeks to reduce the need to travel on a principally local scale. The Government's White Paper: The Future of Air Transport (Dec 2003) recognises the opportunity to claw back the passenger air travel market that exists in the Midlands but which is currently leaking to airports outside the region, and to reduce the number of long distance journeys made to airports by supporting the development of regional facilities. Similar travel savings are offered by the provision of parkway stations. These provide opportunities for longer journeys to be undertaken by more sustainable rail transport as an alternative to the private car. The objector proposes that further text be added to Paragraph 3.25 to acknowledge the scope for such savings and to express support for additional travel facilities, such as the scheduled commercial passenger services at Coventry Airport or the provision of parkway stations, where it can be shown that they will reduce distances travelled by private vehicle by people within the District.

3.15.9 It seems to me that this objection is more about addressing how journeys are to be carried out once a decision has been made to travel. Providing better public transport facilities like parkway stations and regional airports may promote more sustainable travel options but will do little to reduce the need to travel. In any event, many of the savings made in journey times will be offset by the attraction of a greater number of trips cancelling out any advantage. I therefore do not support the additional wording promoted by the objector.

Recommendations

3.15.10 That no modifications be made to the Revised Deposit Plan in respect of these objections.

3.16 Paragraphs 3.27 - 3.28 The Core Strategy of the Local Plan. Objective 3B: To promote the use of more sustainable travel options

Objections to First Deposit Version

193/AX	Coten End and Emscote Residents' Association
199/AX	James Mackay
234/AA	Cllor A Gordon (Sherbourne Parish Council)

Objections to Revised Deposit Version

No objections

Key Issues

- 3.16.1** (1) Whether the Plan should acknowledge that restraint on use of the private car can only operate effectively in urban areas where alternatives are available.
- (2) Whether the objective should be more proactive towards proposals to improve public transport facilities and require major travel generating developments to be located and designed to be accessible by sustainable means of transport.

Inspector's Appraisal and Conclusions

3.16.2 Issue 1: Rural areas raise particular issues concerning sustainable transport choices. However, in order to maximise travel sustainability across the District as a whole I accept that it is necessary to focus the majority of development in suitable urban locations near to public transport interchanges and to encourage improvements in public transport. In this regard, I see no need to amend the text supporting objective 3B.

3.16.3 Issue 2: The District Council accepts that the First Deposit Plan was not as positive as it might have been in promoting public transport, even though the Council is not a public transport authority. I support the amendments made at Revised Deposit stage which now refer at Paragraph 3.28 to making and facilitating, as well as supporting, proposals to improve public transport services and infrastructure. As regards major travel

generating developments, I feel that the emphasis in Paragraph 3.28 on directing such schemes to locate near to public transport interchanges to encourage patronage is the right approach. The alternative wording suggested by Mr Mackay and the Coten End and Emscote Residents' Association is, I feel, too prescriptive.

Recommendations

3.16.4 That no modifications be made to the Revised Deposit Plan in respect of these objections.

3.17 Paragraphs 3.29 - 3.30 The Core Strategy of the Local Plan. Objective 3C: To ensure the prudent use of scarce resources and limit and reduce the impacts of climate change

Objections to First Deposit Version

148/AD Campaign to Protect Rural England (Warwickshire Branch)
168/AC Advantage West Midlands

Objections to Revised Deposit Version

154/RAB National Farmers' Union
199/RAA James Mackay
350/RAJ Tesco Stores Ltd

Key Issues

- 3.17.1** (1) Whether the objective should be supported by a specific policy on renewable energy.
- (2) Whether the objective should be more proactive in requiring new developments to incorporate energy efficient measures.
- (3) Whether the reference to high quality agricultural land should read 'best and most versatile' to accord with Structure Plan policy.
- (4) Whether 'landscape' should be recognised as a resource.
- (5) Whether the reference to 'landscape' in the Revised Deposit Plan is too restrictive and not adequately explained.
- (6) Whether the addition of 'climate change' to the objective is reflected in the explanatory text.

Inspector's Appraisal and Conclusions

- 3.17.2 Issue 1:** This matter has been addressed by inclusion in the Revised Deposit Plan of new Policy DP12a in respect of Renewable Energy Developments.

3.17.3 Issue 2: Policy DP12 (Energy Efficiency) encourages the layout and design of energy efficient buildings but it cannot require that specific measures be incorporated. I am satisfied that the Policy goes as far as it reasonably can in expecting applicants to demonstrate the steps that have been taken. In my opinion, Objective 3C properly reflects the current position in respect of Government policy.

3.17.4 Issue 3: The objection by CPRE (Warwickshire Branch) to use of the term ‘high quality’ agricultural land has been met in the Revised Deposit Plan by substitution of the words ‘best and most versatile’. I support that amended wording which more accurately reflects national and strategic planning policy.

3.17.5 Issue 4: Likewise, the District Council has accepted that ‘landscape’ is a resource deserving of protection.

3.17.6 Issue 5: I agree with the objector that simply inserting the word ‘landscape’ in Paragraph 3.29 of the Revised Deposit Plan causes confusion. Any new development, no matter how small, could conceivably have some impact upon the landscape implying that it would be resisted. I endorse the proposed change put forward by the District Council. The sentence would then more reasonably read: “We will also protect best and most versatile agricultural land and the landscape from inappropriate new development.”

3.17.7 Issue 6: Although not specifically mentioning climate change, I consider that Paragraphs 3.29 and 3.30 do properly support objective 3C. The minor correction to the objective put forward by the District Council allows it to read as intended. I support that proposed change.

Recommendations

3.17.8 (a) That the Revised Deposit Plan be modified as follows:

(i) amend the objective to read:

“To ensure the prudent use of scarce resources and limit and reduce the impacts on climate change”

(ii) amend the last sentence of Paragraph 3.29 to read:

“We will also protect the best and most versatile agricultural land and the landscape from inappropriate new development.”

(b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.

3.18 Paragraph 3.31 The Core Strategy of the Local Plan. Objective 4A: To make housing affordable and available to everyone.

Objection to First Deposit Version

Objection to Revised Deposit Version

No objections

Key Issues

- 3.18.1 (1) Whether the objective should recognise the role played by mixed use developments in securing affordable housing.
- (2) Whether the objective should include a target for affordable housing.

Inspector's Appraisal and Conclusions

3.18.2 **Issue 1:** Objective 4A does not preclude affordable housing in mixed use developments. As the District Council points out, Paragraph 3.26 specifically promotes schemes that provide opportunities for people to live, shop or work in close proximity. In my view no further elaboration is necessary.

3.18.3 **Issue 2:** The District Council has agreed that a target for affordable housing would improve the Plan. A target of at least 100 new affordable homes per year has been included in Paragraph 5.46 of the Revised Deposit Plan in support of Policy SC9. That target is felt to be a realistic assessment of the potential to deliver affordable housing taking into account the likely supply of committed and future windfall sites. I note that a reference to targets is made in Paragraph 3.31. I support those amendments.

Recommendations

3.18.4 **That no modifications be made to the Revised Deposit Plan in respect of this objection.**

3.19 **Paragraph 3.32 The Core Strategy of the Local Plan. Objective 4B: To reduce poverty, social exclusion, crime and anti-social behaviour.**

Objection to First Deposit Version

Objection to Revised Deposit Version

No objections

Key Issue

3.19.1 Whether the District Council should support the provision of 'lifetime homes' as a proportion of all new homes built in the District across all tenures.

Inspector's Appraisal and Conclusions

3.19.2 'Lifetime homes' are those that comply with the standards promoted by the Joseph Rowntree Foundation. They are suitable for different generations of families at the same time, including provision for the disabled. While the District Council supports the concept it considers it would be difficult at the present time to require a percentage of homes to be built to that standard. I agree. I note that the District Council has included in Paragraph 3.32 of the Revised Deposit Plan a reference to 'homes that meet the needs of all within society'. It has also inserted a new Paragraph 5.5A under Policy SC1 (Securing a Greater Choice of Housing) indicating that the Council will actively support the inclusion of a suitable proportion of such homes wherever this is practical and appropriate. In my view this substantially addresses the objection.

Recommendations

3.19.3 That no modifications be made to the Revised Deposit Plan in respect of this objection.

3.20 Paragraph 3.33 The Core Strategy of the Local Plan. Objective 4C: To improve the health and well-being of communities.

Objections to First Deposit Version

193/AY Coten End and Emscote Residents' Association
199/AY James Mackay

Objection to Revised Deposit Version

350/RAK Tesco Stores Ltd

Key Issues

- 3.20.1** (1) Whether other means open to the District Council for promoting the health and well-being of communities should be recognised in the Plan.
- (2) Whether the objective should clarify how local shops and services can deliver healthy lifestyles and/or make reference to social inclusion and accessibility to a range of facilities.

Inspector's Appraisal and Conclusions

3.20.2 Issue 1: The text of Paragraph 3.33 of the Revised Deposit Plan has been augmented to show how the Plan seeks to promote healthy lifestyles. Mention is made of reducing the need to travel; promoting local shops and services; offering safe and convenient alternatives on foot, cycle or public transport; and protecting open spaces. I note that a subsequent proposed change has also been suggested by the District Council, referring to 'leisure' as well as recreational opportunities. I am satisfied that these

amendments address the objectors' concern and assists in better understanding the objective.

3.20.3 Issue 2: Paragraph 3.33, as amended, explains that the provision of local shops and services can contribute to a healthy lifestyle by reducing the need to travel and by promoting safe and convenient alternative modes. I consider that specific references to social inclusion and access to a range of facilities are more appropriately dealt with under other Plan objectives, notably 4B and 4E.

Recommendations

3.20.4 (a) That the Revised Deposit Plan be modified as follows:

replace the third sentence of Paragraph 3.33 with the following:

“Providing a variety of leisure and recreational opportunities and protecting open space is also essential to promote the health and well-being of the community and support social inclusion.”

(b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.

3.21 Paragraph 3.34 The Core Strategy of the Local Plan. Objective 4D: To protect the amenity of the local community.

Objection to First Deposit Version

No objections

Objections to Revised Deposit Version

191/RAJ Robin A Richmond
195/RAK The Leamington Society

Key Issue

3.21.1 Whether this objective should include a reference to improving standards of amenity.

Inspector's Appraisal and Conclusions

3.21.2 The District Council has accepted that the objective should be not only to protect but also to improve standards of amenity. I support the proposed change to the Revised Deposit Plan which amends Paragraph 3.34. In my view, it is also necessary to amend the objective itself in the interests of consistency. The objection has, I note, been conditionally withdrawn.

Recommendations

3.21.3 (a) That the Revised Deposit Plan be modified as follows:

(i) amend the objective to read:

“To protect and improve the amenity of the local community”

(ii) replace the second sentence of Paragraph 3.34 with the following:

“We will ensure all new development takes account of surrounding uses and is designed to protect and improve standards of amenity.”

(b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.

3.22 Paragraph 3.35 The Core Strategy of the Local Plan. Objective 4E: To protect, enhance and improve accessibility to local services and community facilities.

Objection to First Deposit Version

No objections

Objection to Revised Deposit Version

341/RAC South Warwickshire Primary Care Trust

Key Issue

3.22.1 Whether the objective should aim to protect existing, and support new, facilities including those relating to health.

Inspector's Appraisal and Conclusions

3.22.2 The objective is a broad one that embraces a wide range of uses. The reasoned justification to Policies SC7 (Directing Community Facilities) and SC7A (Protecting Community Facilities) makes it clear at Paragraph 5.33 that protection/support is given to existing and proposed medical facilities.

Recommendations

3.22.3 That no modifications be made to the Revised Deposit Plan in respect of this objection.

3.23 Chapter 3 – Omissions

Objections to First Deposit Version

107/AA	University of Warwick
262/AG	Warwick & Leamington Spa Green Party
302/AC	English Heritage (West Midlands Region)
303/AA	Racecourse Holdings Trust

Objection to Revised Deposit Version

303/RAA	Racecourse Holdings Trust
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Key Issues

- 3.23.1** (1) Whether Aims 1 and 2 should include a reference to higher education and the High Technology Corridors.
- (2) Whether the Plan should include a statement about the use and renovation of empty properties.
- (3) Whether landscape character should be acknowledged as a separate objective under Aim 2 in view of its multi-faceted nature.
- (4) Whether the Plan should include an objective to support and improve existing and new leisure facilities.

Inspector's Appraisal and Conclusions

- 3.23.2 Issue 1:** In response to an objection from the University of Warwick at First Deposit stage the District Council agreed to incorporate in the Revised Deposit Plan references to higher education and the High Technology Corridors identified in the RSS. These have been inserted in the spatial strategy of the Plan at Paragraphs 3.6B and 3.6E. I accept that this is an appropriate location and preferable to augmenting Aims 1 and 2.
- 3.23.3 Issue 2:** The Plan encourages the re-use of vacant buildings/land through objective 2A and Paragraph 3.16. In light of this I believe no further reference is necessary.
- 3.23.4 Issue 3:** I acknowledge that landscape character is a function of the complex interplay of many different components. This interrelationship between natural, built and historic factors is reflected in the Countryside Agency's landscape character assessment guidelines. The District Council considers that the objectives of the core strategy, when taken together, afford adequate recognition and protection of the various elements of landscape character. However, to reinforce the point a specific reference to historic landscapes has been added to objective 2C at Revised Deposit stage. I note that English Heritage has conditionally withdrawn its objection on that basis.
- 3.23.5 Issue 4:** Objective 4C already highlights the health/well-being and economic benefits of leisure facilities. Nevertheless, the District Council recognises that it would be helpful to include leisure uses alongside recreation and open space and therefore proposes a further change to Paragraph 3.33. I support that minor amendment. I see no need for a separate, specific objective.

Recommendations

3.23.6 (a) That the Revised Deposit Plan be modified as follows:

replace the third sentence of Paragraph 3.33 with:

“Providing a variety of leisure and recreational opportunities and protecting open spaces is also essential to promote the health and well-being of the community and support social inclusion.” *[NB This recommendation duplicates that made under objective 4C]*

(b) That no further modifications be made to the Revised Deposit Plan in respect of these objections.
