

Warwick District Local Plan 1996 - 2011
Topic Response Analysis – Revised Draft Deposit Version

Topic: Appendix 1: Employment Land Supply
Summary of matters raised in objections.
No objections made
Response of Head of Planning & Engineering to matters raised
Recommended revision(s)

Topic: Appendix 2
Summary of matters raised in objections.
<ol style="list-style-type: none"> 1. Housing requirement should be based on RSS figures using Structure Plan proportions and disregarding the period prior to 2001 <i>118/RAA Mr & Mrs G Bull; 119/RAP Bloor Homes; 120/RAA Miller Homes (West Midlands); 136/RAA George Wimpey; 137/RAA Grevayne Properties; 138/RAA Laing Homes Ltd; 139/RAA Coventry Diocesan Board; 140/RAA Court Warwickshire; 141/RAA Parkridge Homes; 142/RAA A C Lloyd; 143 RAA Scottish Widows; 144/RAA Project Solutions; 167/RAA Mrs E Brown; 201/RAC Home Builders Federation; 208/RAA Pettifer Estates Ltd; 214/RAP Janet Biles; 229/RAB Gallagher Estates; 239/RAB Mr David Austin; 288/RAB Warwickshire Police Authority; 322/RAP J G Land & Estates; 344/RAA Greywell Property Ltd</i> 2. The Local Plan should provide at least 10 years supply of housing <i>118/RAA Mr & Mrs G Bull; 119/RAP Bloor Homes; 120/RAA Miller Homes (West Midlands); 136/RAA George Wimpey; 137/RAA Grevayne Properties; 138/RAA Laing Homes Ltd; 139/RAA Coventry Diocesan Board; 140/RAA Court Warwickshire; 141/RAA Parkridge Homes; 142/RAA A C Lloyd; 143 RAA Scottish Widows; 144/RAA Project Solutions; 167/RAA Mrs E Brown; 208/RAA Pettifer Estates Ltd; 214/RAP Janet Biles; 229/RAB Gallagher Estates; 239/RAB Mr David Austin; 288/RAB Warwickshire Police Authority; 322/RAP J G Land & Estates; 344/RAA Greywell Property Ltd</i> 3. The estimate of windfall sites should be based on the policies in the emerging Plan rather than the adopted Plan <i>118/RAA Mr & Mrs G Bull; 167/RAA Mrs E Brown; 344/RAA Greywell Property Ltd</i> 4. The estimated over supply of housing is flawed and new housing allocations are required <i>118/RAA Mr & Mrs G Bull; 136/RAA George Wimpey; 137/RAA Grevayne Properties;</i>

138/RAA Laing Homes Ltd; 139/RAA Coventry Diocesan Board; 140/RAA Court Warwickshire; 141/RAA Parkridge Homes; 142/RAA A C Lloyd; 143 RAA Scottish Widows; 144/RAA Project Solutions; 167/RAA Mrs E Brown; 208/RAA Pettifer Estates Ltd; 229/RAB Gallagher Estates; 288/RAB Warwickshire Police Authority; 344/RAA Greywell Property Ltd

5. The windfalls estimate is flawed and includes some double counting with commitments
119/RAP Bloor Homes; 120/RAA Miller Homes (West Midlands); 214/RAP Janet Biles; 239/RAB Mr David Austin; 322/RAP J G Land & Estates

Response of Head of Planning & Engineering to matters raised

1. Following the enactment of the Planning and Compulsory Purchase Act in September 2004, RPG11 (June 2004) became the West Midlands Spatial Strategy. Policy CF3 included housing provision figures for unitary authorities and counties, but not for districts. When the Strategy was issued in June, an accompanying letter from the Minister of State for Housing and Planning stated that “the absence of housing allocations may cause some difficulties for local authorities in the short term” and that, pending the completion of the partial review of housing (which would determine housing figures down to district level), districts should “work on the basis of the current Structure Plan proportions to 2011”. The letter also stated that “beyond that, the proportions may not be appropriate. However, in the absence of any better information authorities should retain the Structure Plan proportions and the PPG3 ‘plan, monitor and manage’ process should address any issues which arise. It is important that this approach should not lead to significant, particularly greenfield, allocations which could be inconsistent with the principles of RPG11.”
The Regional Planning Body (RPB) were concerned about the implications of applying Structure Plan proportions because it may lead to the unnecessary release of greenfield sites and affect the ability of Districts to meet affordable housing needs. The Council, therefore, sought advice from the Regional Planning Body and the Government Office for the West Midlands as to how to incorporate the housing provision figures in Policy CF3. The latter were not in a position to give advice due to the impending General Election but advice from the RPB was to apply the proportionate reductions in the RSS figures to the Structure Plan figures up to 2011. These figures were incorporated into the Revised Deposit Version. Following the General Election, and the publication of the Revised Deposit Version of the Plan, Ian Smith of the Government Office for the West Midlands issued advice on how to interpret the housing figures in Policy CF3 (Table 1). The Council accepts this advice and recommends that these are incorporated into the Local Plan.
2. The Local Plan covers the period to 2011 because beyond this date there are no district level requirements for the provision of employment land and no firm housing requirements. The adopted Regional Spatial Strategy (RSS) provides housing figures for higher level authorities to 2021 and there are interim arrangements for the application of these figures at district level (see item 1. above). The letter from Ian Smith dated 16 June 2005 (see above) advises local authorities to apply Structure Plan proportions to the housing figures in the RSS from 2001 and to disregard housing completions prior to 2001. The letter makes no further comment on the appropriateness of applying the proportions beyond 2011. The Regional Planning Body has concerns about applying Structure Plan proportions to the RSS county figures. In their view, this could lead to the unnecessary release of greenfield sites in Districts since the Structure Plan proportions do not reflect the availability of brownfield sites in Districts or the focus for development in the RSS. The West Midlands Regional Assembly has published a

Draft Project Plan for the review of RSS policies including housing and employment requirements. This indicates that the final review will be published in Autumn 2008. This Review will take into account the latest household projections, the capacity for urban brownfield development, the need for affordable housing and evolving government policy on housing, in particular, the new PPS3. It would be the Council's intention to produce a Core Strategy following the adoption of this Local Plan and this will incorporate the housing and employment figures of the RSS Review.

Notwithstanding the above, however, the Council is confident that the existing supply of housing land, including the potential for brownfield windfall sites, would be sufficient to meet the interim housing requirement in the RSS (using Structure Plan proportions) up until 2021. This is largely because the annual requirement for the period 2011-2021 (347 dwellings per annum) is only slightly above that which could be achieved from windfall development and the balance would be made up from the high level of completions, over and above the requirement, since 2001.

The following Tables demonstrate how the RSS requirement could be met up until 2021. Table 2 takes into account the Council's recently approved Supplementary Planning Document (SPD) on Managing Housing Supply. This SPD regulates further permissions for housing on urban windfall sites in order to reduce the future over supply of housing in relation to the RSS requirement. On the supply side, therefore, the Table shows two levels of urban windfall potential– one where windfalls are not restricted through the SPD and one where the SPD is implemented up until 2011. It is assumed that only 10% of available windfalls will come forward if windfalls are regulated through the SPD (i.e 28 p.a. as opposed to 282 p.a.)

TABLE 1 THE RESIDUAL REQUIREMENT 2005 – 2021	
	Dwellings
A RSS Requirement 2001-2021 (maximum)	8,094
B Completions 2001 - 2005	3,324
C Balance of Requirement 2005-2021 (A less B)	4,770

TABLE 2 SUPPLY 2005-2021	
	Dwellings
A Commitments at 01/04/05 *	2,560
B Estimate of Rural Windfalls 2005-2021 (@ 11 p.a.) **	165
C Estimate of Urban Windfalls 2005-2021 (@ 282 p.a. – No SPD) **	4,230
D Estimate of Urban Windfalls 2005-2021 (@ 28 p.a. for 6yrs and 282 p.a. for 9 yrs assuming the	2,706

SPD is implemented to 2011) **	
E Total Supply : Commitments and Windfalls (No SPD) 2005-2021 (A+B+C)	6,955
F Total Supply: Commitments and Windfalls (with SPD up until 2011) 2005-2021 (A+B+D)	5,430
* Commitments discounted by 10%	
** Windfalls discounted by 1 year	

The Council agrees that Appendix 2 could set out the way in which the interim RSS requirement could be met without the need for further allocations in this Plan.

3. Estimates of windfall sites in the urban and rural areas have been recalculated taking into account new information from the Housing Monitoring Report 2005 and the potential effects of the Managing Housing Supply SPD. Estimates of rural windfalls are based on completions in the Limited Growth Villages and, elsewhere, of replacement dwellings only. This takes account of policy in the emerging Local Plan. In the urban area windfall estimates are based on past trends of completions on brownfield windfall sites and a 90% discount is made to reflect the likely effect of the SPD.
4. The following Table demonstrates the over supply of housing in the District in relation to the Regional Spatial Strategy housing requirement.

MEETING THE STRATEGIC REQUIREMENT 2001 – 2011	
	Dwellings
RSS Requirement 2001-2011 (maximum)	4,624
A Total Completions 2001-2005	3,324
B Total Commitments	2,560
C Completions and commitments at 01/04/05	5,884
D Balance to be provided 2005-2011	0

The above Table does not include an estimate of windfall completions. The following Table demonstrates the levels of over supply with and without estimates of windfall completions, assuming no action is taken to curb urban windfall development. In the rural area windfall estimates are based on completions in the Limited Growth Villages and, elsewhere, of replacement dwellings only. This takes account of policy in the emerging Local Plan. In the urban area windfall estimates are based on past trends of completions on brownfield windfall sites over the past 9 years, in order to reflect a wider variation in trends.

OVER SUPPLY OF HOUSING 2001 – 2011	
	Dwells
Housing Requirement 2001-2011	4,624
A. Housing Supply (Completions & Commitments) 2001-2011:	
Completions 2001-2005	3,324
Housing Supply at April 2005 (Commitments only)	2,560
Total Supply	5,884
Over Supply	+1,260
<i>Over Supply as Percentage of Housing Requirement</i>	<i>27%</i>
B. Housing Supply (Completions, Commitments & Windfalls) 2001-2011:	
Completions 2001-2005	3,324
Housing Supply at April 2005 (Commitments and Windfalls)	4,026
Total Supply	7,350
Over Supply	+2,726
<i>Over Supply as Percentage of Housing Requirement</i>	<i>60%</i>

- 5 The windfall estimates have been discounted by one year to allow for double-counting with commitments in the first year.

Recommended revision(s)

1. Amend Appendix 2 to incorporate the RSS county housing requirement using the proportions in the Structure Plan for Warwick District
2. Add Table to end of Appendix 2 to show how the RSS requirement up until 2021 can be met from completions, commitments and brownfield windfalls
3. Update windfall estimates
4. No Change
5. Update windfall estimates

REVISE APPENDIX 2 AS FOLLOWS:

APPENDIX 2

The Warwickshire Structure Plan, adopted in August 2002, allows for the provision of 8,000 dwellings in Warwick District between 1996 and 2011. In June 2004, the Regional Planning Guidance for the West Midlands (RPG11) was adopted and this now has the status of the

Regional Spatial Strategy (RSS) for the West Midlands. The RSS includes housing figures for Warwickshire County for the periods 2001-2007, 2007-2011 and 2011-2021. A partial review of the RSS, due for completion in late 2008, will provide housing figures at District level. In the meantime, Government advice to districts is that for the period at least 2001-2011 they should

apply the district proportions in the Structure Plan housing allocations. Warwick District's proportion of the Structure Plan housing figures is 25.7%.

The Table below shows the *residual* housing requirement. This is the balance of housing that needs to be provided after taking into account housing which has already been built since 2001.

Table 1: The Residual Housing Requirement 2005-2011

Source	Dwellings	Comments
Regional Spatial Strategy (RSS) Housing Requirement 2001-2011	4,624	This equates to 25.7% of the requirement for Warwickshire
Dwellings Completed 2001 to 2005	3,324	These are dwellings that have been built and are ready for occupation. This is the 'known' element of the supply. Source: Housing Monitoring Report 2005.
Remaining dwellings to be provided 2005-2011	1,300	This is the RSS requirement less completions. (The residual requirement)

The Local Plan must make provision for 1,300 dwellings between 2005 and 2011. The forecast supply of dwellings to meet the requirement is set out in the following table.

Table 2: Dwellings Supply at 2005

Source	Dwellings	Comments
Dwellings Committed at 2005	2,844	These are dwellings with planning permission or under construction, dwellings that were allocated within the previous Local Plan (1995) or dwellings identified within development briefs adopted by the District Council. Source: Housing Monitoring Report 2005.
Dwellings Lapsed post 2005	-284	These are the estimated number of dwellings committed at 2005 but not yet built that will not come forward. Source: Housing Monitoring Reports
Windfalls Estimate 2005-2011 (Urban)	1,410	This is the number of dwellings expected to be completed on urban brownfield windfall sites during the period 2005 to 2011 if recent trends continue. Source : Urban Capacity Study (2002). Housing Monitoring Reports
Windfalls Estimate 2005-2011 (Rural)	56	This is the number of dwellings expected to be completed on rural windfall sites during the period 2005-2011 Source : Housing Monitoring Reports
Total Supply	4,026	This is the number of dwellings estimated to

		be provided for during the period 2005 to 2011.
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The figures at April 2005 reveal potential for an over provision of 2,726 dwellings against the RSS requirement to 2011. It is not appropriate therefore for the Council to allocate any land for new dwellings for the period to 2011. Furthermore, no allocations from the previous Local Plan have been renewed. The majority of these allocations have been built or have the benefit of planning permission. Of the three major allocations, Warwick Gates is completed and South Sydenham and South West Warwick are under construction. The non renewal of allocations therefore has minimal impact on the number of dwellings committed at 2005 although it will help to reduce the over provision. The following table lists the outstanding allocations, or part allocations, not renewed and which do not benefit from planning permission at the time of publication of the Deposit Plan.

Table 3: Outstanding Allocations from previous Local Plan not renewed

Previous Policy Ref./Site	Dwellings
LW H3.5/ Coventry Road/ Montague Road	30
LW H3.9/ Edmonscote Playing Field	40
K H2.2/ St Johns Street	10

It should be noted that the Urban Capacity Study was undertaken within the policy context of the previous Local Plan. The application of the policies within this Local Plan, particularly the protection of employment land and buildings, may reduce the number of windfalls achieved in the remainder of the Plan period. This may reduce the extent of the over provision against the RSS requirement. The Council will continue to annually monitor its progress towards achieving the overall housing requirement and adopt the principles of 'plan, monitor and manage' accordingly as advocated within PPG3. The results of the monitoring will be published within the Annual Monitoring Report.

The Structure Plan requires that the maximum number of dwellings are built on previously developed (brownfield) urban land and buildings. It has set an indicative target of 45% of new housing to be provided on previously developed land and buildings. The following table sets out the position at 2005 regarding progress on meeting this target.

Table 4: Urban Brownfield Completions and Commitments at 2005

Source	Dwellings
Urban Brownfield Completions 1996-2005	2,917 (43% of total completions)
Urban Brownfield Commitments at 2005	2,043 (72% of total commitments)
Urban Brownfield Dwellings as a proportion of total dwellings completed or committed at 2005	4,960 (51% of total supply)

(Source: Housing Monitoring Report 2005)

This table reveals that 51% of dwellings completed or committed at 2005 are on previously developed urban land and buildings. 'Urban' in terms of the housing monitoring report data is defined as the four towns; Leamington Spa, Kenilworth, Warwick and Whitnash. This percentage figure is in line with the Structure Plan target. The Council will adopt policies within this Local Plan

that seek to continue to achieve and exceed this target. The annual monitoring will also assess progress towards meeting the indicative targets for brownfield urban land and buildings.

This Plan covers the period 2001-2011. For the period beyond 2011, the successor to this Plan will make provision for the housing requirement which is due to be reviewed by 2008 by the Regional Planning Body. The following Tables show how the interim RSS housing requirement to 2021 could be met by completions, commitments and potential windfall development.

Table 5: The Residual Housing Requirement 2005- 2021

Source	Dwellings	Comments
Regional Spatial Strategy (RSS) Housing Requirement 2001-2021	8,091	This equates to 25.7% of the requirement for Warwickshire
Dwellings Completed 2001 to 2005	3,324	These are dwellings that have been built and are ready for occupation. This is the 'known' element of the supply. Source: Housing Monitoring Report 2005.
Remaining dwellings to be provided 2005-2021	4,767	This is the RSS requirement less completions (The residual requirement)

Over the longer term, provision will need to be made for 4,767 dwellings between 2005 and 2021. The forecast supply of dwellings to meet the requirement is set out in the following table.

Table 6: Dwellings Supply at 2005

Source	Dwellings	Comments
Dwellings Committed at 2005	2,844	These are dwellings with planning permission or under construction, dwellings that were allocated within the previous Local Plan (1995) or dwellings identified within development briefs adopted by the District Council. Source: Housing Monitoring Report 2005.
Dwellings Lapsed post 2005	-284	These are the estimated number of dwellings committed at 2005 but not yet built that will not come forward. Source: Housing Monitoring Reports
Windfalls Estimate 2005-2021 (Urban)	4,230	This is the number of dwellings expected to be completed on urban brownfield windfall sites during the period 2005 to 2021 if recent trends continue. Source : Urban Capacity Study (2002).

		Housing Monitoring Reports
Windfalls Estimate 2005-2021 (Rural)	165	This is the number of dwellings expected to be completed on rural windfall sites during the period 2005-2021 Source : Housing Monitoring Reports
Total Supply	6,955	This is the number of dwellings estimated to be provided for during the period 2005 to 2021.

The over supply of housing will be addressed through the preparation of a Supplementary Planning Document in accordance with Policy SC8a.

Topic: Appendix 3
Summary of matters raised in objections.
No objections received.
Response of Head of Planning & Engineering to matters raised
Recommended revision (s)

Topic: Glossary
Summary of matters raised in objections.
<ol style="list-style-type: none"> 1. Object to the incorrect glossary entry for historic landscape characterisation (Warwickshire County Council Archaeology ref: 149 RAA, English Heritage ref: 302/RAG). 2. Suggests changes to the definition of Ecosites and 'Regionally Important Geological and Geomorphological Site' (Warwickshire County Council ref: 150/RAF).
Response of Head of Planning & Engineering to matters raised
<ol style="list-style-type: none"> 1. For comprehensiveness it is agreed that the definition should be amended as requested. 2. It is agreed that both definitions should be amended as requested.
Recommended revision (s)
<ol style="list-style-type: none"> 1. Replace the term 'historic landscape designation' for 'historic landscape <u>characterisation</u>'. Add '<u>and to establish an integrated approach to its sustainable management</u>' to the end of the definition. 2. Amend definition for Ecosites as follows 'current system operated by Warwickshire

Museum Field Services to record sites of acknowledged nature conservation value. This includes the location of approximately 2500-3500 statutory and non statutory sites (~~Ecosites~~) within Warwickshire, Coventry and Solihull'. Each site....

Amend term Regionally Important Geological and Geomorphological Site.