
CHAPTER 11: APPENDICES AND GLOSSARY

11.1 Overview

11.1.1 The Plan includes 3 Appendices and a Glossary. I recommend that Tables 1 and 2 in Appendix 1 (Employment Land Supply) be revised, that a replacement Appendix 2 (Housing Land Supply) be substituted, and that the Glossary be amended.

11.2 Appendix 1: Employment Land Supply

Objection to First Deposit Version

26/AA Rev. J.R. Moore

Objections to Revised Deposit Version

148/BW Campaign to Protect Rural England (Warwickshire Branch)
228/BQ West Midlands RSL Planning Consortium
242/AF Coventry City Council (Planning & Transportation)
256/AG T & N Ltd (In administration)

Key Issues

- 11.2.1** (1) Whether land committed for employment development at the western end of Warwick Gates should be allocated for housing and a primary school.
- (2) Whether Appendix 1 is sufficiently clear as to the scale of future development allowed for at Stoneleigh Business Park.
- (3) Whether Appendices 1 and 2 should be re-written to take account of the need for a revised Plan end date and a corresponding need for new housing and employment allocations.
- (4) Whether there is a need to identify a 10 year supply of employment land.
- (5) Whether reference should be made to achieving affordable housing on employment sites.
- (6) Whether sites at Poplars Farm (Sherbourne), Shrewley Farm and Manor Farm (Old Milverton) should be deleted from the list of employment sites as they imply that permission will be granted for further industrial use.

Inspector’s Appraisal and Conclusions

- 11.2.2 Issue 1:** (*Warwick Gates*) The Warwick Gates development comprises new residential areas, local shopping centre, community facilities, and open space. It gained planning permission for mixed use development in 1997. The majority has been built out with just 18.07ha remaining at the western end for development as an employment site. That land, triangular in shape, is bounded by Heathcote Lane and Heathcote Industrial Estate to the north, Macbeth Approach to the east, Harbury Lane to the south, and the A452 to the west. It is a substantial commitment contributing significantly to the Structure Plan requirement for Warwick District of 132ha of employment land to 2011. The site forms a logical extension of the Heathcote Industrial Estate to the north. It gives direct access onto the A452 and thence to the M40 motorway or north to Coventry and the M69/M1. I agree with the District Council that it is a strategically well placed and appropriate site for employment development.
- 11.2.3** PPG3 states that local planning authorities should review employment sites when reviewing their development plan and consider whether some of this land might be better used for housing or mixed use developments. The January 2005 update of PPG3 builds on that advice. It indicates that local planning authorities should consider favourably housing on redundant employment sites unless the housing development would undermine the planning for housing strategy or it can be demonstrated through an up-to-date review of employment land that there is a realistic prospect of the allocation being taken up for its stated use in the plan period.
- 11.2.4** I am satisfied that adequate provision has been made for new homes in the Revised Deposit Plan. There is, in fact, evidence of an oversupply of housing in relation to strategic targets in the RSS. The District Council has responded to that oversupply by preparing a Supplementary Planning Document: 'Managing Housing Supply' to reduce the future supply of urban windfall housing. That SPD is supported by the GOWM, the Regional Assembly and the County Council. In light of this situation, I see no requirement for the release of any further land for new housing.
- 11.2.5** As regards safeguarding land for housing beyond 2011, the District's housing requirements are uncertain pending completion of the partial review of the RSS. The District Council is committed to begin preparation of a Core Strategy DPD in 2007. That DPD and, if necessary, a Housing Allocations DPD, will be able to dovetail with completion of the partial review of the RSS and therefore accommodate up-to-date housing requirements for the District to 2021.
- 11.2.6** Turning to the employment land position, Policy SSP1 allocates sufficient sites to meet the Structure Plan requirement for the District to 2011. Appendix 1 of the Plan (updated to reflect monitoring in summer 2005) sets out how that requirement will be met in terms of sites that have already come forward for development since April 1996, sites and premises that are currently identified as commitments and will come forward by 2011, and new allocations. This shows that the District Council can meet its requirement to provide 132ha as set out in the Structure Plan, even allowing for the exclusion of sites considered at sessions of this inquiry where it was conceded that there was some doubt as to whether they would be fully available within the Plan period. However, to do this the District Council must rely on its existing commitments. One of the largest of those sites is Warwick Gates.
- 11.2.7** I am told that when the initial Masterplan for Warwick Gates was first drawn up it included an area set aside for a primary school. However, following discussions with the County Council Education Department that school site was later omitted. It was

considered that existing primary schools in Whitnash had sufficient capacity to accommodate the anticipated demand for school places, albeit with developer contributions to provide additional facilities.

11.2.8 This site was subject of the Omission Sites Consultation. I note that objections to allocation of this land for housing were made by Bishops Tachbrook Parish Council, CPRE (Warwickshire Branch) and the Warwick Society, all of whom referred to the oversupply of housing and the need to provide adequate land for employment activity. Several individuals supported the suggestion for the provision of a primary school.

11.2.9 I conclude that the employment commitment at Warwick Gates is required to meet the Structure Plan target. It is in a sustainable location close to a residential area with good road network connections. Further land is not required for market housing during this Plan period and there is no proven need for a primary school in the immediate locality.

11.2.10 Issue 2: This objection by Coventry City Council has been conditionally withdrawn. Stoneleigh Business Park is already in employment use. Its redevelopment will only yield an additional 1.6ha of employment land. I agree with the District Council that it would be inappropriate to include the entire site in the employment land figures. That would constitute double counting.

11.2.11 Issue 3: The objection by T & N Ltd (In Administration) has been conditionally withdrawn. Related objections in respect of a mixed use allocation on land south-west of Radford Semele are addressed elsewhere in my report.

11.2.12 Issue 4: The Structure Plan requires the District Council to identify employment land up to 2011. For the period beyond that, land releases will be controlled through the RSS. I accept that the District Council is not in a position to allocate employment land for that period. The necessary regional and sub-regional work has not yet been completed. The Coventry/Solihull/Warwickshire sub-region has an established working arrangement in place between the individual authorities. Together, they have commissioned consultants to undertake a joint sub-regional employment land review to cover the period 2006-2021. That work will inform preparation of each authority's LDF and assist the partial review of the RSS. I note that it also seeks to identify a portfolio of Regional Investment Sites in accordance with RSS Policy PA7. The study was commissioned in late 2005 and at the time of writing had not yet been published.

11.2.13 Issue 5: Appendix 1 lists those sites which have the benefit of an extant planning permission for industrial development or are allocations within the previous Local Plan. The approach to the provision of affordable housing is set out in Policy SC9.

11.2.14 Issue 6: Appendix 1 is simply a statement showing which sites have permission for employment use. It does not commit to the provision of additional development. The District Council points out that there are differences between Tables 1 and 2 in the Revised Deposit Plan and those presented in its Employment Core Topic Paper¹. Those differences reflect updating with 2005 monitoring information. The amended Tables include alterations to site areas which have been re-measured to exclude infrastructure and constraints, and windfalls granted planning permission in the period April 2004 to March 2005. Since then, a further amendment has been made. The site at Pools Peace Poultry Farm has a reduced site area of 0.9ha. This results in it being classified as a

¹ CD21

small rather than a large site and reduces slightly the total supply. I reflect these changes in my recommendations.

Recommendations

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

substitute at Appendix 1 Tables 1 and 2 set out in the District Council's further written statement Ref No: WDC/FWS/Appendix 1/1.

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

11.3 Appendix 2: Housing Land Supply

Objections to First Deposit Version

117/AT	Langstone Homes Ltd
120/AQ*	Miller Homes (West Midlands)
130/AA	Lucas Land and Planning
132/AE	KB Benfield Group Holdings Ltd
153/AB*	Thomas Bates and Son Ltd
158/AC	Tyler-Parkes Partnership
197/AJ	Norton Lindsey Parish Council
200/AP	Taylor Woodrow Strategic Developments
201/AE*	Home Builders' Federation
227/AB	David Wilson Homes (East Midlands) Ltd
228/BR	West Midlands RSL Planning Consortium
239/AA	Mr D Austin
240/AA	George Wimpey Strategic Land
256/AH	T & N Ltd (In administration)

Objections to Revised Deposit Version

118/RAA	Mr and Mrs G Bull
119/RAP*	Bloor Homes Ltd
120/RAA*	Miller Homes (West Midlands)
136/RAA	George Wimpey Strategic Land
137/RAA	Greyvayne Properties Ltd
138/RAA	Laing Homes Midlands
139/RAA	Coventry Diocesan Board of Finance Ltd
140/RAA	Court Developments Ltd
141/RAA	Parkridge Homes Ltd
142/RAA	A C Lloyd Ltd
143/RAA	Scottish Widows Investment Partnership
144/RAA	Project Solutions
167/RAA	Mrs E Brown
201/RAC*	Home Builders' Federation

208/RAA	Pettifer Estates Ltd
214/RAP	Mrs J Biles
229/RAB*	Gallagher Estates Ltd
239/RAB	Mr D Austin
288/RAB	Warwickshire Police Authority
322/RAP	J G Land and Estates
341/RAE	South Warwickshire Primary Care Trust
344/RAA	Greywell Property Ltd

(* denotes consideration at RTS. See Paragraphs 5.12.2 - 5.12.32 of this report)

Key Issues

11.3.1 (1) Whether, in respect of the housing land supply position:

- the housing requirement should be based on figures in the RSS, and supply figures should disregard the period prior to 2001
- windfall estimates are flawed and include double counting with commitments
- windfall estimates should be based on policies in the emerging Plan
- there is undue reliance placed on windfall estimates
- the Plan should include greater explanation which should be incorporated in the main body of the Plan

(2) Whether, in respect of the need to allocate sites for housing:

- there is adequate justification for not doing so
- sites should be allocated because there is under-provision from the previous Plan

(3) Whether the Plan should identify a 10 or 15 year supply of housing.

(4) Whether the Plan should clarify how the housing policies will be monitored and reviewed.

Inspector's Appraisal and Conclusions

11.3.2 Issue 1: The District Council has accepted that the housing requirement in Appendix 2 of the Revised Deposit Plan needs to be amended to incorporate the new housing requirements in Policy CF3 (Table 1) of the RSS. Consequently, revised Appendix 2 includes a housing requirement based on applying the Warwick District proportions in the Structure Plan to the RSS figure for Warwickshire. Also, the housing supply figures in revised Appendix 2 are now based on the period commencing 2001. The period between 1996 and 2001 has been disregarded as per the advice of 16 June 2005 from the GOWM. I support those amendments which bring the Plan into alignment with the RSS and Government advice.

11.3.3 The District Council's methodology for estimating windfalls is set out in a paper that was presented to the RTS on Managing Housing Supply. Commitments are taken as sites with planning permission and those allocated in the adopted Local Plan. Experience reveals that new, previously unidentified sites will emerge year on year. To estimate the number of such sites coming forward, the District has looked at past trends of windfall

completions. I agree that this is preferable to examining windfall permissions. This is because not all permissions are implemented and there is a risk of double counting where a site has the benefit of more than one permission. While the future windfall completion rate may be well above the average experienced in the recent past, I am content that this is not due to double counting with commitments. It is a consequence, amongst other matters, of Government planning policy. It reflects the facts that (a) the number of windfalls emerging has increased considerably from 295 in 2001/02 to 937 in 2004/05, (b) the number of brownfield windfall completions has increased from 250 in 2001/02 to 550 in 2004/05, and (c) densities are increasing. The District Council points out that the percentage of dwellings completed on sites with a density of over 30dph increased from 71.3% in 2003/04 to 76.7% in 2004/05.

11.3.4 I believe that emerging policies have been taken into account in the windfall estimates. In respect of urban windfall sites, the estimates are based on past trends of completions on previously developed land only, and in regard to rural windfalls the estimates are based on past trends of completions in the Limited Growth Villages on previously-developed land and replacement dwellings.

11.3.5 There is clearly a large supply of windfall sites in Warwick and Leamington Spa, confirmed by the number of sites coming forward for permission. PPG3 indicates that local plans should give priority to the re-use of previously-developed urban land for housing. That guidance proceeds in Paragraphs 35 and 36 to state that local planning authorities should make specific allowances for all the different types of windfalls in their plans, large and small. I feel it would be inconsistent with Government advice to give inadequate consideration to the re-use of urban windfall sites. I do not consider that undue reliance is placed upon them.

11.3.6 I see no need for a more detailed explanation in the Plan of the housing supply position. In my opinion, Appendix 2 provides adequate information on the housing requirement, commitments and windfall estimates. I believe it would be inappropriate to include such information in the main body of the Plan because the housing supply information is time-limited. Each year the District Council publishes its Annual Monitoring Report and Housing Land Monitor giving up-to-date housing supply information.

11.3.7 Issue 2: Table 8 of the 2005 Housing Monitoring Report² shows that there were 2,844 committed housing sites (sites under construction, with permission, allocated or subject of a development brief). With an allowance of 10% for non-implementation that figure reduces to 2,560. The housing requirement set out in Table 10 of that same Report equates to 4,624 dwellings between 2001 and 2011, and 8,094 dwellings between 2001 and 2021. Since April 2001, 3,324 dwellings have been completed. Adding this figure to the commitments shows that there is no balance to be provided to 2011, and 2,210 dwellings to be provided to 2021.

11.3.8 This Local Plan only covers the period to 2011 in the absence of firm housing or employment figures for the period beyond. The housing figures derived from the RSS for 2011-2021 are indicative only. Nevertheless, the District Council is able to show that there is no need to identify further housing sites. The balance of 2,210 dwellings to be provided between 2005 and 2021 equates to 138 dwellings per year. The District Council's estimates of windfall sites (based on past trends and emerging Local Plan policy) equate to an annual average of 282 dwellings in the urban area and 11 dwellings

² CD303

per year in the rural area. On the basis of these figures, I am satisfied that the District Council is justified in not identifying sites to meet the requirement to 2021.

11.3.9 I do not accept that sites should be allocated because there is under-provision from the previous Plan. There is no evidence of this. Even if there was, Government advice is clear. The District Council should only take into account completions since 2001.

11.3.10 Issue 3: New Table 5 of revised Appendix 2 shows how the residual housing requirement for the period 2005-2021 can be met. This particular objection is therefore satisfied.

11.3.11 Issue 4: The way in which the Plan's housing policies will be monitored and reviewed is explained in the paragraphs supporting Policy SC8a. They refer to the 'plan, monitor, and manage' approach and the requirement to produce an Annual Monitoring Report. Again, this objection has been met.

Recommendations

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

substitute Replacement Appendix 2 set out in Core Document 28. (NB This recommendation duplicates that at Paragraph 5.12.32 of my report in respect of Policy SC8a.)

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

11.4 Appendix 3: Local Nature Reserves and Ancient Woodlands

Objections to First Deposit Version

1/AF	Warwickshire Wildlife Trust
10/AF	Bubbenhall Parish Council
148/BX	Campaign to Protect Rural England (Warwickshire Branch)
150/AL	Warwickshire County Council (Museum Field Services - Ecology)

Objection to Revised Deposit Version

No objections

Key Issues

11.4.1 (1) Whether the Schedule of Ancient Woodlands in Appendix 3 and the Proposals Map are accurate.

(2) Whether Waverley Wood, Bubbenhall shown on the Proposals Map should be listed in Appendix 3.

Inspector's Appraisal and Conclusions

11.4.2 Issue 1: I note that 5 areas of ancient woodland identified by Warwickshire County Council (Museum Field Services – Ecology), omitted from the First Deposit Plan, have been added to Appendix 3 at Revised Deposit stage. Also, 2 alterations have been made to the boundaries of woodlands defined on the Proposals Map. As a result of these amendments, Warwickshire County Council and Warwickshire Wildlife Trust have conditionally withdrawn their objections. I endorse those alterations.

11.4.3 Issue 2: Waverley Wood, Bubbenhall has been included in the list of ancient woodlands in Appendix 3 of the Revised Deposit Plan. CPRE (Warwickshire Branch) has conditionally withdrawn its objection. The objection by Bubbenhall Parish has also been met. Once again, I support that amendment.

Recommendations

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

11.5 Glossary

Objections to First Deposit Version

1/AH	Warwickshire Wildlife Trust
149/AG	Warwickshire County Council (Museum Field Services - Archaeology)
150/AN	Warwickshire County Council (Museum Field Services - Ecology)
210/AP	English Nature
223/AU	Kenilworth Town Council
228/BS	West Midlands RSL Planning Consortium
302/BP	English Heritage (West Midlands Region)

Objections to Revised Deposit Version

149/RAA	Warwickshire County Council (Museum Field Services - Archaeology)
150/RAF	Warwickshire County Council (Museum Field Services - Ecology)
302/RAG	English Heritage (West Midlands Region)

Key Issues

- 11.5.1** (1) Whether the following definitions should be amended to provide more accurate wording - ancient woodlands; listed buildings; habitat biodiversity audit; ecosites; sites of importance for nature conservation; local nature reserves; and ancient monuments.
- (2) Whether the definition of ‘previously developed land’ should be expanded to indicate that it excludes land which has been previously developed but where there is a clear reason not to re-use the site because of its contribution to nature conservation.

- (3) Whether the definition of ‘affordable housing’ should include a reference to both subsidised and low cost market housing.
- (4) Whether the following additional terms should be included and defined in the glossary - historic landscape characterisation; registered parks and gardens; regionally important geological and geomorphological sites; biodiversity; geodiversity; local biodiversity action plan; local geodiversity action plan; geomorphology; and convenience shopping.

Inspector's Appraisal and Conclusions

11.5.2 Issue 1: Amended definitions for all these terms were included in the Revised Deposit Plan. I endorse those alterations which have led the following to conditionally withdraw their objections - Warwickshire Wildlife Trust, Warwickshire County Council (Museum Field Services – Archaeology), English Nature, and English Heritage (West Midlands Region).

11.5.3 Issue 2: The District Council has amended the definition of ‘previously developed land’ in the Revised Deposit Plan to reflect the guidance in Annex C of PPG3. On that basis, English Nature has conditionally withdrawn its objection. I support that alteration.

11.5.4 Issue 3: The Government’s definition of affordable housing is set out in Paragraph 5.52 of the Revised Deposit Plan. This includes both low cost market and subsidised housing. But Government guidance encourages local definitions of affordable housing to be developed and set out in Local Plans. The Warwick District local definition included in the Glossary puts the emphasis on housing which genuinely meets the needs of those who are unable to access housing to rent or buy on the open market. It highlights the affordability of the dwelling, which will change over time, rather than the tenure. This approach is now supported by Annex A of draft PPS3 which defines affordable housing as 'non market housing provided to those whose needs are not met by the market'. Consequently, I consider that the the new national definition of affordable housing (and intermediate housing) should be substituted in the Glossary for the local definition.

11.5.5 Issue 4: Definitions of these additional terms were incorporated in the Revised Deposit Plan. For the sake of completeness, ‘comparison shopping’ was also included to complement the definition of ‘convenience shopping’. I note that in response to subsequent objections to those definitions the District Council has put forward a number of changes. I support such additions/refinements which make the Plan easier to comprehend. The objections made by English Heritage (West Midlands Region), English Nature, and Warwickshire County Council (Museum Field Services – Archaeology) have been conditionally withdrawn.

Recommendations

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

- (i) **replace the term ‘Historic Landscape Designation’ with the term “Historic Landscape Characterisation” and add to the end of the definition the words “...and to establish an integrated approach to its sustainable management.”**

- (ii) amend the definition of Ecosites to read:

“current system operated by Warwickshire Museum Field Services to record sites of acknowledged nature conservation value. This includes the location of approximately 3500 statutory and non statutory sites within Warwickshire, Coventry and Solihull.....”

- (iii) amend the term ‘Regionally Important Geological and Geomorphological sites’ to read:

“Regionally Important Geological and Geomorphological Sites’.

- (iv) substitute a revised definition of affordable housing and insert a new definition of intermediate housing, to read:

Affordable Housing – non-market housing, provided to those whose needs are not met by the market for example homeless persons and key workers. It can include social-rented housing and intermediate housing. Affordable housing should:

- meet the needs of eligible households, including availability at low enough cost for them to afford, determined with regard to local incomes and local house prices; and

- include provision for the home to remain at an affordable price for future eligible households, or if a home ceases to be affordable, any subsidy should generally be recycled for additional affordable housing provision.

Intermediate Housing – housing at prices or rents above those of social-rent but below market prices or rents. This can include shared equity products (for example HomeBuy) and intermediate rent (ie rents above social-rented level but below market rents). Intermediate housing differs from low cost market housing (which Government does not consider to be affordable housing – see definition of affordable housing above).

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