

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

Topic: Appendix 1

Summary of matters raised in objections.

1. Object on the grounds that there is a need to identify a ten year supply of employment land (T & N Ltd ref: 256/AG).
2. Statements relating to the redevelopment of Stoneleigh Business Park should be clarified (Coventry City Council ref: 242/AF).
3. Object that no reference has been made to achieve affordable housing on these sites (West Midlands RSL Planning Consortium ref: 228/BQ).
4. Sites at Poplar's Farm, Shrewley Farm, Squab Hall Farm and Manor Farm should be deleted from the list of employment sites as it implies that permission will be granted for further industrial use (CPRE ref: 148/BW).
5. It is suggested that the committed employment site at Warwick Gates should be allocated for housing and a primary / junior school (Rev J R Moore ref: 26/AA).

Response of Head of Planning & Engineering to matters raised

1. The Structure Plan requires the Council to identify land up to 2011. Beyond this time, future land releases will be controlled through implementation of the RSS. Warwick District Council is not in a position to make allocations for this period since the necessary regional and sub regional work that would need to precede this has not been undertaken.
2. As this site is already in employment use its redevelopment will only yield a further 1.6ha of employment land than what currently exists. It would therefore be inappropriate to include the entire site area in the employment land figures.
3. Appendix one is intended to set out which sites have permission to meet the employment land requirement for Warwick District. The policy approach to the provision of affordable housing is set out elsewhere in the local plan in policy SC9.
4. Appendix one is a statement of fact showing which sites have permission for employment uses. It does not commit to the provision of further industrial uses at any of these sites. It is noted that there are differences between the table included in the website version and that in the paper copy which will be addressed in the second deposit draft.
5. As part of the negotiations to establish the planning gain requirements for Warwick Gates the County Council education department were consulted to establish if there was a requirement for school provision within the site boundary.

The County's preferred option was to absorb any school places at existing schools in Whitnash following improvements to provision. There is no demand for sites to be allocated for additional residential development during this plan period.

Recommended revision (s)

1. No changes required
2. No changes required.
3. No changes required.
4. No changes required.
5. No changes required.

Topic: Appendix 2

Summary of matters raised in objections.

1. There is inadequate justification for the failure of the plan to allocate sites for housing.
117/AT Langstone Homes Ltd; 120/AQ Miller Homes (West Midlands); 132/AE KB Benfield Group Holdings; 200/AP Taylor Woodrow Strategic Developments; 239/AA Mr D Austin
2. Plan should allocate more land for housing because there is an under-provision of sites from the previous plan.
130/AA Lucas Land and Planning
3. The Urban Capacity Study is flawed and therefore the housing figures are unreliable.
153/AB Thomas Bates & Son Ltd
4. There is too much reliance on windfall sites.
158/AC Tyler-Parkes Partnership; 240/AA George Wimpey Strategic Land; 256/AH T & N Ltd
5. Plan should reconcile the difference between the Structure Plan requirement and the estimated provision.
197/AJ Norton Lindsey Parish Council
6. Greater explanation is required of the housing land supply position and this should be included in the main body of the Plan
117/AT Langstone Homes Ltd; 120/AQ Miller Homes (West Midlands); 200/AP Taylor Woodrow Strategic Developments; 201/AE House Builders Federation; 239/AA Mr D Austin
7. Plan places undue reliance on commitments and windfalls
117/AT Langstone Homes Ltd; 120/AQ Miller Homes (West Midlands); 200/AP Taylor Woodrow Strategic Developments; 201/AE House Builders Federation; 227/AB David Wilson Homes (East Midlands) Ltd; 239/AA Mr D Austin
8. Plan should clarify how the housing policies will be monitored and reviewed.
228/BR West Midlands RSL Planning Consortium
9. Plan should identify a 10 year supply of housing
240/AA George Wimpey Strategic Land; 256/AH T & N Ltd

Response of Head of Planning & Engineering to matters raised

1. The updated housing land information demonstrates that commitments at April 2004 exceed the adjusted Structure Plan residual requirement by 1,818 dwellings . A number of the larger committed housing sites are sufficiently well advanced in the development process to give confidence that they will proceed to implementation. These sites are listed below:

Sites Under Construction and Large Sites at an Advanced Stage of Implementation April 2004	
	Dwellings
Under Construction at April 2004	745
Not Started (but located on sites where development has commenced):	
<i>South West Warwick</i>	92
<i>Regent Hotel</i>	88
<i>King Edward VII Hospital</i>	126
<i>South Sydenham</i>	124
Sites at an Advanced Stage (development commenced since April or site preparation underway):	
<i>Pottertons</i>	294
<i>Pipers Lane</i>	43
<i>Bread & Meat Close</i>	80
Outstanding Greenfield Allocated Sites (with permission subject to S 106 Agreement):	
<i>South West Warwick</i>	520
Total	2112

- It is not considered, therefore, that further allocations are required.
2. See 1. above
 3. The revised and updated Appendix 2 does not rely upon the results of the Urban Capacity Study to show that the adjusted Structure Plan target can be met. A number of sites identified in the Study have since come forward for development and the Plan does no longer need to rely upon windfall sites in order to meet the residual requirement. See also 1. above.
 4. The revised Appendix 2 estimates the windfall allowance by examining the results of the Urban Capacity Study and past trends. This is in line with PPG3 paragraph 36 which states that “allowance should be made on the basis of examining past trends in windfalls coming forward for development and on the likely future windfall potential as assessed in a capacity study.” Windfall completions on urban brownfield sites since 1996 averaged 249 per annum. Over 6 years (7 years discounted by one to avoid double counting with commitments) this amounts to 1494 dwellings. The Urban Capacity Study sources identified in Table 20 of the study allow for 1414 dwelling sites over 6 years. The range is therefore given as 1414-1494. No allowance is made for greenfield windfalls.
 5. A new Policy SC8a will introduce a “plan, monitor and manage” element to the Plan which will allow for the regulation of windfall sites in the event of an oversupply of housing. See responses to Policy UAP1.
 6. I do not consider that a detailed explanation of the housing figures should be

included in the Plan. The base information will be included in the Appendix and this will be updated each year within the Annual Monitoring Report and, in greater detail, in the annual Housing Monitoring Report. The base information is time-limited and not appropriate within the main body of the report which will have a life of 7 years. However, in order to ensure that all the relevant information is available to consultees, a separate Housing Information Paper will be produced.

7. See 1. above.
8. See 5. above. An annual Housing Monitoring Report will be produced and a summary of the main findings will be included within the Annual Monitoring Report.
9. The Plan is unable to identify a 10 year supply of housing because the Structure Plan provides the housing requirement to 2011 only. Housing figures beyond this date have yet to be set by the Regional Planning Body. Work is due to commence later this year and is expected to take 2 years to complete. Figures extending beyond 2011 are unlikely to be available before 2008.

Recommended revision(s)

1. Update figures in Appendix 2
2. Update figures in Appendix 2
3. Update figures in Appendix 2
4. Update figures in Appendix 2
5. New Policy SC8a Managing Housing Supply. See changes to Policy UAP1
6. No change to main body of report. Update Appendix 2. Produce Housing Information Paper
7. Update figures in Appendix 2
8. New Policy SC8a Managing Housing Supply. See changes to Policy UAP1
9. No change

Topic: Appendix 3 - Local Nature Reserves and Ancient Woodlands

Summary of matters raised in objections.

1. There are some inaccuracies on the proposals map and on the schedule of Woodlands. Ref AL/(APP3) Warwickshire Museum Field Services – Ecology
2. Waverley Wood appears on the proposals map but not in appendix 3 ref148/BX (APP3). Campaign to Protect Rural England – Warwickshire Branch
3. As in 2 (above). ref10/ AF (APP3) Bubbenhall Parish Council.
4. Identical objection as in 1 (above) ref1AF(APP3) Warwickshire Wildlife Trust.

Response of Head of Planning & Engineering to matters raised

1. The five records (omissions) identified by The Warwickshire Museum are added to appendix three, two alterations to the woodland areas defined on the proposals map are also dealt with.
2. Add Waverley Wood to list in appendix three.
3. See response to 2.
4. See response to 1.

Recommended revision (s)

1. Add the records suggested by Warwickshire Museum/ Warwickshire Wildlife Trust to appendix three.
2. Add Waverley Wood to appendix three.
3. See response to 2.
4. See response to 1.

Topic: Glossary

Summary of matters raised in objections.

1. **Ancient Woodlands** –The term should be reworded to replace ‘for at least 400yrs’ to ‘since 1600’ (Andrew Thompson ref: 1/AH).
2. **Listed building** – definition should refer to English Heritage not English Nature (Warwickshire Museum Archaeology ref: 149/AG, English Heritage ref: 302/BP)
3. Object to the incorrect definition of **Habitat Biodiversity Audit** which actually refers to ‘**Ecosite**’, a separate system operated by Warwickshire Museum Field services. Amended definitions of both terms should be included (Andrew Thompson ref: 1/AH, Warwickshire Museum Ecology ref: 150/AN, English Nature ref: 210/AP).
4. The definition of **Sites of Importance for Nature Conservation (SINCs)** should include an additional paragraph to refer the identification of sites as part of the Wildlife Sites Project. It should be noted that S.I.N.C’s include sites of geological value, referred to as regionally important geological and geomorphological sites (Warwickshire Museum Ecology ref: 150/AN, English Nature ref: 210/AP). It is suggested that paragraphs 9.17 and 9.23 provide a more accurate explanation of the term (Andrew Thompson ref: 1/AH).
5. **Local Nature Reserve** - definition should acknowledge that LNR’s are designated by local authorities in consultation with English Nature (Andrew Thompson 1/AH, English Nature ref: 210/AP, Warwickshire Museum Ecology ref: 150/AN).
6. Object to the use of the term **Ancient Monument** as it can be used to denote any archaeological site. It is considered that it should be replaced by ‘Scheduled Ancient Monument’ and should refer to the Ancient Monuments and Archaeological Areas Act 1979. It is suggested that it may also be beneficial to emphasise that ‘scheduled status’ imposes strict constraints on activities undertaken – (Warwickshire Museum Archaeology ref: 149/AG, English Heritage ref: 302/BP).
7. It is requested that the definition for **Previously Developed Land** is expanded to state that it excludes land which has been previously developed but where there is a clear reason not to reuse the site due to its contribution to nature

conservation (Warwickshire Museum Ecology ref: 150/AN, English Nature ref: 210/AP). **See rep to Objective 2A (210/AP).**

8. The definition of **Affordable housing** should include a reference to both subsidised and low cost market houses (West Midlands RSL Planning Consortium ref: 228/BS)
9. The following new terms have been proposed for inclusion within the glossary:
 - Historic landscape characterisation – (Warwickshire Museum Archaeology ref: 149/AG)
 - Registered Parks and Gardens (English Heritage ref: 302/BP)
 - Regionally important geological and geomorphological sites (Warwickshire Museum Ecology ref: 150/AN, English Nature ref: 210/AP)
 - Biodiversity – (Warwickshire Museum Ecology ref: 150/AN, English Nature ref: 210/AP)
 - Geodiversity - (Warwickshire Museum Ecology ref: 150/AN, English Nature ref: 210/AP)
 - Local Biodiversity Action Plan (LBAP) – (Warwickshire Museum Ecology ref: 150/AN, English Nature ref: 210/AP)
 - Local Geodiversity Action Plan (LGAP) – (Warwickshire Museum Ecology ref: 150/AN, English Nature ref: 210/AP)
 - Geomorphology – (Warwickshire Museum Ecology ref: 150/AN, English Nature ref: 210/AP)
 - Convenience Goods Shopping - (Kenilworth Town Council ref: 223/AU).

Response of Head of Planning & Engineering to matters raised

1. It is agreed that the wording of the term should be amended as suggested.
2. It is agreed that for accuracy the definition for listed building should be amended as appropriate.
3. It is agreed the definition of Habitat Biodiversity Audit should be reworded and for consistency a definition for Ecosites should also be included.
4. It is agreed that the definition of S.I.N.C's should be amended as suggested.
5. It is agreed that the definition of Local Nature Reserves should be amended as requested (but should refer to the revised name for English Nature).
6. It is agreed that the entry should be replaced with the term 'scheduled ancient

monument' to improve clarity and should refer to the act.

7. In accordance with guidance set out in Annex 3 of PPG3 it is accepted that the definition of previously developed land should be extended to exclude land which has been previously developed but where there is a clear reason not to reuse the site such as its contribution to nature conservation.
8. The definition of affordable housing at Warwick District is housing which genuinely meets the needs of those who are unable to access housing to rent or buy on the open market. It is the affordability of the dwelling which is important rather than the tenure. The affordability of different tenure types will change over time as house prices, interest rates, rents and incomes change. The reference to tenure is, therefore, deliberately omitted in the definition.
9. Additional terms proposed for inclusion:
 - It is agreed that a definition should be included to reflect changes made to DP3.
 - This term is referred to within DAP13. Although it is defined within the reasoned justification it is agreed that there may be merit in defining the term within the glossary.
 - This term has been included in the text of the Local Plan as part of changes to Para 9.23 of DAP4 therefore should be defined within the glossary.
 - It is agreed that the term biodiversity should be included within the glossary as it is referred to in a number of policies within the local plan.
 - Reference to geodiversity is now included within DP3 and should be defined within the glossary.
 - Local Biodiversity Action Plan and Local Geodiversity Action Plan are referred to within the text of the plan and should be defined in the glossary.
 - To reflect changes made to DAP4 geomorphology should be defined within the glossary.
 - Convenience Goods Shopping - It is agreed that a definition for convenience goods shopping would be helpful and for comprehensiveness a definition for comparison shopping should also be included. Both of these terms are referred to within the local plan text.

Recommended Revision(s)

1. Replace 'for at least 400yrs' to 'since 1600'
2. Amend definition to refer to English Heritage.
3. Amend definition for Habitat Biodiversity Audit and add definition for Ecosite as outlined below.
4. Reword definition of SINC's as suggested.
5. Amend definition to refer to 'local authorities in consultation with Natural England'
6. Replace entry for Ancient Monument with 'Scheduled Ancient Monument'

7. Extend definition of PDL.
8. No changes required.
9. Add the following definitions to the glossary:
 - Historic Landscape Designation – a programme involving desk based mapping and analysis of the historical and cultural origins and development of the present landscape to inform understanding and management of the historic landscape resource.
 - Registered Parks and Gardens – parks and gardens which appear on the Register of Parks and Gardens of Special Historic Interest compiled by English Heritage.
 - Regionally Important Geological and Geomorphological sites – A non statutory geological or geomorphological site considered worthy of protection due to regional educational, scientific, historical or aesthetic importance.
 - Biodiversity – The whole variety of life encompassing all genetics, species and ecosystem variations including plants and animals.
 - Geodiversity – the variety of rocks, fossils, minerals and natural processes.
 - Local Biodiversity Action Plan – partnership project providing the local response to address national and local biodiversity targets and objectives. Individual action plans are being produced for key habitats and species which are found locally.
 - Local Geodiversity Action Plan – action plan undertaken at county level to enable local geological and geomorphological conservation.
 - Geomorphology – the study of natural landforms.
 - Convenience Shopping – the provision of everyday essential items such as food.
 - Comparison Shopping – the provision of retail goods not obtained on a frequent basis i.e. televisions, carpets.