

Warwick District Local Plan Topic Paper

Housing Supply

June 2016



Introduction

- 1 The Topic Paper has been prepared to support and justify the approach taken by Warwick District Council in preparing modifications to the submitted Local Plan. The modifications seek to directly address the Inspector's findings with regard to the Local Plan's housing supply. Specifically the topic paper addresses the following issues:
 - What is the most up to date position with regard completions within the Plan Period?
 - What is the most up to date position with regard outstanding planning permission?
 - What is a reasonable windfalls allowance for Warwick District?
 - To what extent can small urban SHLAA sites be included within the supply?
 - How can the approach to the consolidation of employment area and canalside regeneration support the supply
 - How many sites need to be allocated within the plan?
 - How much flexibility/headroom does the plan provide and why is this reasonable?
 - How has the distribution of allocated sites been justified?
 - What is the latest position with regard to the development of major urban extension allocations (sites over 500 dwellings)?
 - How do all the sources of supply combine to provide a trajectory of housing delivery during the plan period?
 - How will the plan provide for specialist and affordable housing needs (G&T; students; accommodation for elderly; affordable housing)?
- 2 Warwick District Council submitted its New Local Plan in January 2015. In May 2015 five days of initial hearing were held exploring issues around Duty to Cooperate, the overall level housing provided and Housing Supply.
- 3 On 1st June 2015 the Inspector wrote to the Council indicating that he believed the plan was unsound for a number of reasons including in respect of the overall housing requirement (which has been addressed in a separate topic paper) and in relation to the overall supply of housing including concerns regarding the windfalls

allowance and the prospect of the Plan delivering a 5year housing land supply on adoption.

- 4 Specifically, the Inspector identified concerns about the housing supply as follows:
 - The allowance made for windfalls: paragraphs 32 to 36 of his letter of 1st June 2015 set out his concerns regarding the Council's approach to windfalls. Whilst he recognises that estimates for annual average windfalls completions from rural sites, conversions and changes of use are reasonable, his concern primarily focuses on an over-reliance on unidentified urban area sites of over 5 dwellings, particularly given the allowance made for small urban SHLAA sites. This leads him to conclude "I do not consider there is compelling evidence that windfall sites will continue to provide a reliable source of supply on the scale envisaged. I find therefore that the overall windfall allowance is not justified or realistic".
 - Level of flexibility: in paragraph 37 the Inspector raises concerns about the lack of flexibility should site not come forward as expected and concludes the supply of housing land "would fall short of that necessary to meet requirements and to provide even a modest level of flexibility by several hundred dwellings".
 - 5 year supply on adoption: in paragraphs 39 to 42 the Inspector sets out his conclusions on the 5 year supply of housing land on adoption. He concludes that a 20% buffer should be applied and calculates that (even with a level of windfall allowances that he considers unrealistic) the Plan would not deliver a 5 year supply from the outset.
 - For these reasons, he concludes that "in relation to the supply and delivery of housing land, the Local Plan is not positively prepared, justified, effective or consistent with national policy. It is not sound."
- 5 This Topic Paper has been prepared to support and justify the approach taken by Warwick District Council in preparing modifications to the submitted Local Plan. The Topic Paper seek to
 - a. explain and justify how the modifications address the Inspector's findings with regard to the Local Plan's housing supply
 - b. provide the most up to date position with regard to different sources of housing supply.

The Submitted Draft Local Plan - January 2015

- 6 The Local Plan submitted by Warwick District Council in January 2015 set out a series of proposals to meet a housing requirement of 12,860 dwelling over the period. Specifically

- Policy DS7 set out completions 406 dwellings) and commitments (1317 dwellings) during the Plan period; an allowance for windfall sites (2485 dwellings); small urban SHLAA sites (393 dwellings); and consolidation of employment land (269 dwellings). This left 6188 dwellings to be provided on allocated sites.
 - Policy DS10 set out the broad locations for allocated housing sites with 1330 dwellings on urban brownfield sites; 850 dwellings on greenfield sites on the edge of Kenilworth; 3245 dwellings on greenfield sites on the edge of Warwick, Leamington and Whitnash; and 763 on sites within growth villages and rural area.
 - Policy DS11 set out the allocated housing sites
- 7 By the time the initial hearings had commenced in May 2015, an additional year's data regarding housing monitoring was available. This data resulted in some adjustments to the housing supply. This was made available to the hearings through the Council's Matter 3 Statement. This was used as the basis for discussions at the Initial Hearings.

Local Plan Modifications February 2016

- 8 In February 2016, the Council agreed a number of modifications regarding the Housing Supply for the Local Plan. These modifications sought not only to address the Inspector's concerns regarding housing supply as set out in para 4 above, but also sought to provide additional supply to meet a significantly increased requirement of 16,776 dwellings over the Plan Period (see Topic Paper on Housing Requirements).
- 9 Mod 6 sets out the amendments to Policy DS7 as follows:

DS7 Meeting the Housing Requirement	
The housing requirement of 16,766 new homes between 2011 and 2029 will be met from the following categories:	
Sites completed between April 2011 and March 2015	1483
Sites with outstanding planning permission at 1 st April 2015	5161
An allowance for windfall sites coming forward between April 2015 and March 2029	1134
Small Urban sites assessed in the Strategic Housing Land Availability Assessment as being suitable	230
Consolidation of existing employment areas and canal-side regeneration	200
Sites allocated in this Plan	9,369
Total	17,577

- 10 Mod 7 provides an explanation in relation to these sources of supply.

- 11 Mod 8 sets out amendments to Policy DS10 as follows:

DS10 Broad Location of Allocated Housing Sites	
Urban Brownfield sites	1208
Greenfield sites on the edge of Kenilworth	1500

Greenfield sites on the edge of Warwick, Leamington and Whitnash	3270
Greenfield sites on the edge of Coventry	2245
Sites within Growth Villages and the rural area	1146
Total	9,369

- 12 Mod 9 explains how these broad locations are consistent with the Council's spatial strategy.
- 13 Mod 10 sets out the amendments to Policy DS11. This includes a number of additional allocations including sites on the edge of urban areas and growth villages, the largest of which are:
- Land at Kings Hill (Site H43): up to 4000 dwellings of which 1800 will be in the Plan Period
 - Land at Westwood Heath - East of Bockendon Road (Site H42): 425 dwellings
 - Land East of Kenilworth (Site H40): 640 Dwellings
 - Land North of Milverton (Site H44): 250 dwellings
 - Land at Gallows Hill (Site H46A): 630 dwellings (of which 450 were granted planning permission in January 2016)
 - The Asps (Site H46B): 900 dwellings (granted planning permission in January 2016)
 - Land at Whitnash East (Site H03): An additional 200 dwellings on top of the 300 dwellings included in the submitted Local Plan
- 14 Mod 11 explains the allocation of the sites set out in the modified Policy DS11

What is the most up to date position with regard completions within the Plan Period?

- 15 Policy DS7 as modified, provides the updated position at 1st April 2015 (see para 9 above). However, the monitoring date for the year ending 31st March 2016 is now available.
- 16 The table below shows the up to date year on year completions since 2011.

Year	Net Completions	Cumulative total
2011/12	144	144
2012/13	262	406
2013/14	345*	751
2014/15	732	1483
2015/16	619	2102
Total at 31/3/16	2102	

*NB this figures include 62 care homes bedspaces completed between 1/4/11 and 31/3/14

- 17 As a result, the residual amount of housing required to meet the minimum requirement is 14,674
- 18 Policy DS7 sets out the sources housing supply to meet this residual requirement:
 - a. Outstanding Planning Permissions (Commitments): See para 19 below and Appendix 1(b) - "Commitments" and Appendix 1(j) "Commitments Apr May 16" for details
 - b. A windfalls allowance: See para 20 below, Appendix 1(d) - Windfalls tab and Doc HO29PM
 - c. Small Urban SHLAA sites: See para 21 below and Appendix 1(c) - Small SHLAA Sites for details
 - d. Consolidation of existing employment areas and canal-side regeneration: See para 22 below Appendix 1(e) - Canalside and Emp Areas
 - e. Sites allocated in this plans: See para 23-25 below and Appendix 1(f,g,h and i) - Allocated Bfield Sites; Allocated Gfield Sites; Villages and New Sites Jan 2016 and Appendix 3 for delivery assessments

What is the most up to date position with regard planning permissions?

- 19 The table below summarises outstanding planning permissions at 31st March 2016. It should be noted that this figure represents a significant change from the position set out in Policy DS7 of the modifications. This is because a significant number of the allocated sites were granted planning permission during 2015/16. These sites have been shown as commitments in the table below and have now been excluded from the allocations. Since 31st March 2016, three significant housing sites have been granted planning permission. Two of these sites are additional to the overall supply (they do not overlap with allocations or windfalls) whilst the third (Seven Acre Close) was an allocation but has now been granted planning permission (subject to Section 106 agreement) for a larger number of dwellings than had been estimated. Appendix 1(b) - "Commitments" provides full details of all outstanding planning permissions at 31st March 2016, and Appendix 1(j) - "Commitments Apr May 16" provides details of the three sites that have been granted planning permission since 31st March 2016.

Planning permissions (updated)	
Planning Permissions @1/4/16 (see Appendix 1(b) - "Commitments ") for details)	7045
Commitments April and May 2016 (see Appendix 1(j) - "Commitments Apr May")	225
Total = Planning Permissions @ 31/5/16	7,270

What is a reasonable windfalls allowance for Warwick District?

- 20 Policy DS7 indicates that an allowance of 1134 dwellings is estimated to come forward on windfall sites during the Plan Period. This figure needs to be adjusted to take account of the inclusion of an additional monitoring year and the fact the plan is not likely to be adopted until April 2017. The consequence of this is that the windfalls allowance for the remainder of the Plan Period needs to reduce by 189 dwellings to **982** (See Appendix 1(d) - "Windfalls"). Doc HO29PM sets out the justification for this estimated windfalls allowance. This shows that there have been a number of important revisions to the Council's methodology for calculating the windfall allowance. These revisions seek to directly address the concerns of the Inspector raised in his letter of 1st June 2015 as follows:
- a. Windfall estimates are based on past windfall supply from rural sites, conversions and changes of use and redevelopment/new build on sites of less than 5 dwellings, in line with paragraph 32 of the Inspector's letter.
 - b. Each of these sources of windfalls supply has been adjusted to reflect current and future policy context and market conditions.
 - c. No allowance has been for the windfalls arising from redevelopment or new build on sites of 5 or more dwellings. This avoids double counting with the SHLAA in line with paragraph 34 of the Inspector's letter
 - d. No windfall sites are included for 2016/17 and 2017/18 and 2018/19 to avoid double counting with existing planning permissions. This takes account of the change of approach set out in Doc EXAM 20 and referred to in paragraph 35 of the Inspector's letter.

To what extent can small urban SHLAA sites be included within the supply?

- 21 As the windfalls allowance set out in Doc HO29PM makes no provision for sites over 5 dwellings and the Local Plan does not

allocate any sites less than 50 dwellings in the urban area, it is reasonable to assume that a number of dwellings will be built on sites between 5 and 50 dwellings within the urban area. The 2015 SHLAA identifies a number of sites in this category which are available for housing development. Appendix 1(c) – “Small SHLAA Sites” shows 14 of these sites which the Council considers to be suitable and deliverable within the Plan Period. These sites have the potential to provide 291 dwellings. However, to allow for the possibility that one or more of them is not developed before 2029, a 10% reduction has been applied. As a result Policy DS7 indicates that **262** dwellings can reasonably be delivered from Small Urban SHLAA sites.

How can the approach to the consolidation of employment area and canalside regeneration support the supply?

22 Within Warwick District there are a number of traditional employment rates which are experiencing significant vacancy rates. The 2013 Employment Land Review studied vacancy rates at these locations. Based on its conclusions it is suggested that **200** dwellings can come forward during the Plan period through the consolidation and redevelopment of traditional employment areas as follows:

- Sydenham Industrial Estate: The estate appears tired and has a high level of vacancies, most notably the northern half of the estate. Potential for rationalisation and consolidation of the estate and redevelopment of the northern half of the estate for residential led development. Part of this area now has planning permission for 143 dwellings. Over the plan period, there is further residential potential beyond this for around 80 dwellings.
- Cape/Millers Rd Industrial Area: The north west part of the area has now largely been redeveloped for residential use, and other pockets have consent for housing schemes. There are significant vacancies in the western half of the area and the quality of the buildings is poorer than the eastern half which has better quality, smaller premises. Potential rationalisation and consolidation of the western area with release of land for alternative uses. Over the plan period, there is further residential potential for around 45 dwellings.
- Montague Road/Nelson Lane: Highway access is very constrained and there are residential areas adjoining. Montague Road comprises several larger site a number of which are either vacant or appear to be coming to the end of their economic life. Redevelopment of these sites for alternative uses may be appropriate. Nelson Lane comprises a range of smaller industrial units as well as car sales premises. It appears reasonably well let, although the constraints of the area for employment use

may mean that the area offers longer term redevelopment potential. Over the plan period, there is residential potential for around 40 dwellings, over and above sites already identified in the SHLAA.

- Common Lane: The estate comprises arrange of older units, many in need of investment. The access road is narrow and unsuitable for larger vehicles. There is a new residential development to the south of the site. Potential comprehensive residential redevelopment opportunity, subject to relocation of existing occupiers. Over the plan period, there is residential potential for around 35 dwellings

How many sites need to be allocated within the plan?

23 The table below shows that, taking account of all other sources of supply, 5,960 dwellings need to be allocated in the Plan to meet the minimum housing requirement.

Housing Supply	
Minimum Requirement	16,776
Less Completions to 31/3/16	2,102
Less Commitments	7,270
Less estimated windfalls	982
Less Small Urban SHLAA Sites	262
Less canalside and consolidated employment land	200
Balance: Minimum to be allocated	5,960

However as indicated by the Inspector and supported by good practice elsewhere it is important to ensure that a level of flexibility over and above the minimum requirement is provided. This is important for two reasons:

- a. there is always some uncertainty regarding the timing of site delivery, particularly where there are complex infrastructure requirements to address. This is particularly the case for the large urban extensions proposed in the Plan. Although the Council is closely monitoring progress on the major urban extensions and is actively working to help bring forward these sites (see appendix 3), some flexibility may be needed to mitigate the risks of unanticipated delays.
- b. The 5 year housing requirement is substantial. To achieve this from the outset of the plan and to maintain it, it is important that there is a variety of site types and locations and that there is some flexibility within the trajectory.

- 24 It should also be noted that the requirement set out in Policy DS6 is a minimum and it is therefore reasonable to provide at a level above this, particularly in the context of Para 47 of the NPPF. Determining the appropriate level of flexibility above the minimum requires a careful balance to be struck. On the one hand the risks associated with under-supply need to be understood and mitigated. On the other hand environmental impacts and in particular impacts on the Green Belt need to be limited and justified. This is particularly important in a District such as Warwick where there is a range of important heritage assets (some of which are of national value), a high quality landscape (which is highly valued by local people) and intense development pressures resulting from a vibrant economy and an adjacent City which is one of the fastest growing in the Country.
- 25 The housing supply set out in Appendix 1 provides for 1,215 dwellings over and above the minimum requirement. This is 7.2% of the total requirement. This level of flexibility offers an appropriate balance: it provides a level of housing over and above the minimum requirement to reduce delivery risks to reasonable levels, at the same time as respecting environmental constraints and avoiding development in the Green Belt without strong exceptional circumstances. In total the Plan provides for 17,991 dwellings over the Plan period and allocates land for 7,175 dwellings as follows:
- a. Allocated Brownfield Sites: 930 dwellings
 - b. Allocated Greenfield Sites (submitted Local Plan): 1680 dwellings
 - c. Allocated Villages Sites: 1100 dwellings
 - d. New Sites (Modifications 2016): 3465 dwellings

How has the distribution of allocated sites been justified?

- 26 In determining the most appropriate locations and sites for housing allocations, the Council has adhered to its spatial strategy set out in Policy DS4 of the submitted Local Plan. This strategy has been appraised as the most sustainable approach to meeting the District's housing requirement.
- 27 Doc HO25PM sets out and justifies the Council's approach to the distribution of development including reference to the sustainability appraisal, alignment with infrastructure, accessibility and employment and exceptional circumstances for Green Belt releases. Specifically the paper sets out the reasoning for including sites in the following locations:
- a. Urban Brownfield sites
 - b. Edge of Coventry
 - c. Edge of Kenilworth

- d. Northern Edge of Leamington Spa
- e. South of Warwick, Leamington and Whitnash
- f. Within or adjacent to growth villages

28 In summary, the proposed distribution:

- a. aligns with the Local Plan's Spatial Strategy, which has been shown to be a sustainable approach
- b. ensures local housing needs are met within the District's main towns and growth villages
- c. provides for the needs of Coventry adjacent to the City or in areas with good connectivity to the City
- d. ensures alignment between the location of housing and existing and proposed areas of employment
- e. ensures good mix of sites and locations across the District to support different markets
- f. ensures a mix of sites which seek to enable a 5 year housing land supply on adoption of the Plan
- g. recognises important environmental constraints such as heritage, landscape and ecology
- h. includes Green Belt releases where exceptional circumstances exist, but otherwise seeks to protect the Green Belt
- i. ensures key infrastructure requirements can be planned and delivered to support the distribution.

What is the latest position with regard to the delivery / development of major urban extension allocations (sites over 200 dwellings)?

- 29 Appendix 3 sets out the most up to date position regarding the progress and anticipated delivery of all urban extension sites over 200 dwellings. The Council recognises that delivery of the Local Plan sites is dependent on a number of factors within its control or influence: processing and determining planning applications; supporting comprehensive development sites (or associated sites); undertaking effective infrastructure planning including identifying and utilising a range of funding sources.
- 30 To support this work, the Council employs a Major Sites Delivery Officer to work with developers and infrastructure providers to provide a clear framework and support the effective delivery of high quality development as quickly as possible. This is already delivering on the ground in the area to the south of Warwick and Whitnash and

a similar approach is being planned for the areas to the south of Coventry and East of Kenilworth.

- 31 It is the Council’s intention to continue to support the development process for all the allocated sites to maximise delivery potential within the Plan Period.

Summary of all sources of supply as of 31st March 2016

- 32 Taking account of the 2015/16 monitoring data (which was not available at the time the Local Plan modifications were prepared), the updated Housing Land Supply Position proposed for Policy DS7, covering the whole Plan period can be summarised as follows:

DS7 Meeting the Housing Requirement	
The housing requirement of 16,766 new homes between 2011 and 2029 will be met from the following categories:	
Sites completed between April 2011 and March 2016	2102
Sites with outstanding planning permission at 1 st April 2016	7045
Site granted planning permission during April and May 2016	225
An allowance for windfall sites coming forward between April 2016 and March 2029	982
Small Urban sites assessed in the Strategic Housing Land Availability Assessment as being suitable	262
Consolidation of existing employment areas and canal-side regeneration	200
Sites allocated in this Plan	7175
Total	17,991
Level of flexibility above the minimum requirement	1,215

Housing Trajectory over the Plan Period and 5 Year Supply on Adoption

- 33 Appendix 1, sets out the Local Plan’s housing trajectory. Taking account of sites with planning permission, small urban SHLAA sites, windfalls, canalside and consolidated employment land sites and allocated sites, the trajectory indicates the following annual delivery rates are likely:

Year	Number of Completions	Cumulative Completions (gross)
2011/12 to 2015/16	2102 (completions to date)	2102
2016/17	1157	3259
2017/18	1293	4552
2018/19	1749	6301
2019/20	1943	8243
2020/21	1935	10178
2021/22	1775	11953
2022/23	1516	13469
2023/24	1105	14574

2024/25	900	15474
2025/26	768	16241
2026/27	749	16990
2027/28	660	17650
2028/29	394	18044

- 34 These delivery rates have involved assessing the estimated delivery timescales for all sites over 10 dwellings, including those with planning permission and those allocated with the Local Plan. This assessment draws on the viability work undertaken in 2015 (Doc HO24PM) and on evidence provided directly by the site promoters as set out in Appendix 3.
- 35 Whilst delivery rates between 2016/17 and 2023/24 are challenging and exceed total delivery rates across the District since monitoring commenced, they are based on reasonable assumptions and they underline the Council's commitment to support national planning policy to "boost significantly the supply of housing". This is particularly important given the evidence of the Joint SHMA (2013) and the Updated Assessment of Housing Need which identifies a need for this level of housing, including a need to improve affordability. This fact, combined with the fact that the Local Plan allocates more land for housing than ever before, means that it is not unreasonable to expect the market to be able to deliver this level of growth.
- 36 The Local Plan is required to deliver a 5 year housing land supply from the outset. The Trajectory (set out in Appendix 1) shows that the Local Plan's proposals can achieve this using the methodology commonly known as "Sedgefield" using the calculation process set out in the Inspector's letter in paragraphs 41. The tables below assume the Local Plan is adopted in spring 2017 and set out how the 5 year supply at the time of adoption is calculated.

THE FIVE YEAR REQUIREMENT AT 31ST MARCH 2017	
	Dwellings
Annual Requirement	932
Requirement 01/04/2011 to 31/03/2017 (6yrs x 932)	5592
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/17	-1157
Sub Total (shortfall since 2011)	2333
Five Year Requirement 01/04/2017 to 31/03/2022 (5yrs x 932)	+4660
Sub Total	6993
Plus 20% Buffer	+1399
Five Year Requirement 1/4/17 - 31/03/22	8392

FIVE YEAR LAND SUPPLY AT 31ST MARCH 2017	
Category of Supply	Dwellings
Commitments 1/04/17 and 31/3/22	4419

Commitments since 1/4/16	225
Small Urban SHLAA sites 1/04/17 to 31/3/22	191
Windfalls 1/04/17 to 31/3/22	294
Canalside and consolidated employment areas 1/04/17 to 31/3/22	20
Allocated brownfield sites 1/04/17 to 31/3/22	335
Submitted Local Plan: Allocated greenfield sites 1/04/17 to 31/3/22	760
Villages 1/04/17 to 31/3/22	955
Modifications: Allocated greenfield sites 1/04/17 to 31/3/22	1495
Total Supply	8694

WARWICK DISTRICT 5 YEAR HOUSING LAND SUPPLY AT 31ST MARCH 2017 – CONCLUSION	
	Dwellings
Five Year Requirement 1/4/17 - 31/03/22	8392
Annual Requirement	1678
5 Year Supply	8694
No. of Years Supply (8694/1678)	5.18

- 37 Whilst the tables above demonstrate that, according to best estimates the Local Plan will deliver a 5 year supply on adoption including a 20% buffer, they also demonstrate that the supply is likely to only marginally exceed the 5 year requirement (by 302 dwellings estimated). The Council contends this is a reasonable position to be in at the time of adoption for the following reasons:
- a. The position is forecast to continue improve through the Plan Period: if the calculations are rolled on for one year the requirement falls to 7958 and the supply is 8916 giving a 5.62 year supply. If they are rolled forward two years, the requirement falls to 6978 and the supply is 8273 giving 5.93 year supply (See appendix 4 for these alternative calculations of the 5 year requirement)
 - b. To a degree the Local Plan is reliant on significant urban extensions which have been added to the allocations specifically to meet the housing need of Coventry. There are a number of factors which make it difficult for the Plan to accommodate this need (let alone significantly exceed it) within 5 years:
 - i. The District has highly valued designated and undesignated environmental assets including high quality landscapes and diverse heritage assets (including notably Warwick and Kenilworth Castles and the conservation areas in Leamington, Warwick, Kenilworth and many of the District’s villages). In addition approximately 80% of the District is currently covered by the West Midlands Green Belt. These factors together mean that identifying sites to meet housing need, has to be done in the context of significant constraints. As a result, it is

unsurprising that the 5 year land supply does not contain a large surplus. Further, given the constraints, it is expected that the pace of development will gather momentum in the years after the adoption of the Local Plan as Green Belt land is released and the detailed steps to mitigate environmental impacts are established.

- ii. This need was not apparent until the Joint SHMA Addendum was undertaken in September 2014 and the impacts on Warwick District were not established until the HMoU was agreed in September 2015.
 - iii. The Council has made a concerted effort to allocate additional land on smaller sites many of which are adjacent to villages. This has enabled a 5 year supply on adoption to be achieved. However, the Village Profile and Housing Allocation paper (Feb 2016) shows that this has resulted in significant growth for a number of the villages. It is the Council's view that it would not be appropriate to allocate significant additional sites in these locations due to the impact on infrastructure and the existing communities.
 - iv. The sites identified have been demonstrated to align with the most sustainable pattern of development. Departing significantly from this to achieve a more dispersed pattern of development to deliver a more robust 5 year land supply is likely to lead to unsustainable travel patterns including more commuting.
 - v. The scale of many of the sites means that they will take some time before completions are delivered. This is particularly the case for some of the larger allocations to the north of the District that are currently within the Green Belt. The current Green Belt designation of these sites means that progress on planning applications cannot be made until after the Local Plan is adopted.
- 38 In this context the relatively marginal 5 year supply and improving situation thereafter, is to be expected. For the same reasons, the Council has considered alternative methods for calculating 5 year land supply such as spreading Coventry's element of the housing requirement across the whole Plan Period. However, this approach is not necessary, as the Council's efforts to identify an additional layer of relatively small sites (particularly adjacent to villages) has meant a 5 year supply on adoption can be achieved. Nevertheless, an alternative 5 year housing land requirement calculation taking this approach is shown in Appendix 4.

Providing for affordable housing and Gypsy and Traveller Accommodation

- 39 **Affordable Housing:** The Updated Assessment of Housing: Coventry and Warwickshire HMA (Sept 2015) identified an affordable housing need of 240dpa for Warwick District. As the Council is also providing for part of Coventry's overall housing need, it is accepted that Warwick District also needs to accommodate some of Coventry's affordable need. The two Councils are currently preparing an Affordable Housing Agreement. This will show that, including a proportion of Coventry's affordable housing need, the District's affordable housing requirement will be 374dpa or 40% of the overall housing requirement of 932dpa.
- 40 The Council's approach to the delivery of affordable housing is predominantly based on two key sources of supply.
- a. Requirements of section 106 agreements to provide a percentage of affordable housing on sites in line with the Draft Policy H2
 - b. Proactive initiatives to bring forward a range of sites for affordable housing
- 41 Appendix 5 shows that combining these two sources the Council is achieving 46% affordable housing on sites over 10 dwellings since April 2013 (this takes account the 7 sites where no on-site provision has been agreed due to viability or other reasonable constraints). For nearly all the major development sites (such as Mallory Grange; Lower Heathcote Farm; Hawkes Meadow and Harbury Gardens) 40% affordable housing has been agreed and is being delivered and in only a very small number of cases have exceptions been agreed on the grounds of viability. Over the last three years, planning permissions have been granted for a range of other sites with 40% affordable housing. These sites are not shown in Appendix 5 as they have not yet commenced. These include The Asps, Gallows Hill, and the rest of Harbury Gardens as well as many of the sites adjacent to the villages outside the Green Belt.
- 42 Further, appendix 5 shows the success of proactive schemes such as Sayers Court, Sydenham Drive, The Newbold Centre and the Fire Station, in boosting affordable housing.
- 43 In total, 504 affordable homes have been delivered on completed sites since April 2011 and a further 1103 are to be delivered on sites that are under construction. Whilst the delivery of affordable housing since 2011 falls short of the overall requirement, this reflects the slower delivery rates of market housing between 2011 and 2015. Appendix 5 shows affordable housing delivery is now gathering momentum in line with the delivery of market housing. It also shows that the Council's approach has the potential deliver the District's affordable housing requirement over the Plan Period.

- 44 **Gypsy and Traveller Accommodation:** The Gypsy and Traveller Accommodation Assessment (GTAA) (Doc HO19) and the further advice provided in 2015 (Doc HO30PM), show a need in Warwick District for a total of 31 permanent pitches (25 to be delivered within the first five years) and a transit site for 6-8 pitches over a 15 year period. This period has since been extended to coincide with that of the Local Plan. The bulk of the permanent pitches would be to address historic under provision.
- 45 Warwick District currently has no permanent or transit Gypsy and Traveller provision. In order to facilitate the provision of suitable, sustainable and deliverable sites, the Local Plan policies H7, H8 and H9 demonstrate a commitment to making provision, the criteria by which sites will be judged when making planning decisions and a discussion of the possible need for compulsory purchase to enable the full need to be met, used only as a last resort. Furthermore, the proposed modifications to the Plan (Feb 2016) make provision for new strategic housing sites to include a Gypsy and Traveller site if future need arises or if there remains an outstanding requirement, or there is proven unmet need from another area beyond the District's own boundaries.
- 46 Work is progressing on a DPD which will allocate sites specifically for this use. The DPD is due to be submitted to the Secretary of State shortly after the examination into the Local Plan has ended.

- APPENDIX 1: Local Plan Housing Trajectory updated June 2016
- APPENDIX 2: *This appendix has been deleted*
- APPENDIX 3: Allocated sites delivery assessments
- APPENDIX 4: Alternative 5 year housing requirement calculations
- APPENDIX 5: Affordable Housing: sites completed or onsite with a proportion of affordable housing

APPENDIX 1: Local Plan Housing Trajectory Updated June 2016

See separate spreadsheet

Appendix 3

Delivery Assessment of Major Urban Extensions Allocated in the Local Plan

Site Ref	Site Name	No. of Dwellings	Status	Comments
South of Coventry				
H43	Land at Kings Hill	4000 (1800 within Plan Period)	Allocation proposed in 2016 modifications	Green Belt. This site is being actively promoted. A consortium has been formed bringing together all the land owners (except one). The site promoters have commenced pre-applications discussions and have indicated an intention to submit an application on adoption of the Local Plan. They have expressed a willingness to prepare and agree a statement of common ground with the Councils prior to the Local Plan hearings recommencing. They have indicated an intention to start on site in 2020/21 with a delivery rate of 200dpa thereafter, giving a total delivery of 1800 dwellings within the Plan Period.
H42	Land at Westwood Heath - East of Bockendon Road	425	Allocation proposed in 2016 modifications	Green Belt The site is being actively promoted. It is in a single land ownership. The site promoters have indicated an intention to submit an application on adoption of the Local Plan. They have expressed a willingness to prepare and agree a statement of common ground with the Councils prior to the Local Plan hearings recommencing. They have indicated an intention to start on site in 2018/19 with a delivery rate of 100dpa thereafter. They expect to complete the site by March 2023.
East of Kenilworth				
H40	Land East of Kenilworth (Southcrest Farm; Crewe Gardens; Woodside Training Centre)	640	Allocation proposed in 2016 modifications	Green Belt This site is in three landownerships. Each of these three parts of the sites is being actively promoted as demonstrated by the representations received to the 2016 Modifications consultation. It is likely that a planning application for this site will come forward during 2017 with potential for development to commence on site during 2018/19 and completion by 2026/27 with delivery rates varying between 50 and 100 dpa.
H06	Land East of Kenilworth (Thickthorn)	760	Allocation proposed in submitted Plan	Green Belt This site is in three land ownerships, two of which are sports clubs. The Council has actively sought to provide alternative sites for the sports clubs and is nearing agreement for both. It is not anticipated that the

				relocation of the sports clubs will impede the development on this site. However, their relocation means that development is unlikely to commence before 2018/19 and may not reach maximum delivery rates until 2020/21. The third part of the site is in private land ownership. Whilst the landowner has indicated a willingness to bring the site forward, the lack of active site promotion work taking place for this part of the site may mean this portion does not come forward until after 2020. At completions rates varying between 50 and 100dpa, it is anticipated that completion on site will be achieved by 2027/28
North of Leamington				
H44	Land North of Milverton	250		Green Belt The site is being actively promoted by a housebuilder in conjunction with the adjacent land which is being proposed for safeguarding. It is expected that a planning application for this site will be submitted in 2017. Thereafter, there are only limited constraints that would impede the rate of development. It is therefore likely that the first completions could be achieved during 2019/20 and at a delivery rate of 50dpa, the site would be completed by 2023/24
H04	Red House Farm	250		Green Belt This site is being actively promoted for development. However, its delivery is closely associated with the Council's project to achieve a regeneration of Lillington. Substantial progress has been made on this project. However the implications of the Housing and Planning Act need to be fully understood before final proposals are developed for the wider area. For this reason, it is not expected that this site will come forward immediately after adoption. It has therefore been assumed that the first completions will be achieved in 2025/26 with overall completion on site in 2028/29
South of Warwick, Leamington and Whitnash				
H01	Myton Gardens and West of Europa Way	1210	735pp 425 pp 50 without pp	With the exception of a small parcel of land (approx. 50 dwellings) this whole site has outline planning permission. The northern part of the site (with permission for 735 dwellings) requires cables to be routed underground before development can commence. This enabling has been commissioned and is due to be completed this year. Thereafter, development of the site can commence. It has therefore been assumed (on the advice of the site promoters) that the first deliveries on this part of the site will be in 2018/19 with completion on site by 2025. The part of the site to the south is owned by WCC. They

				are currently in negotiation to release this site for housebuilding. These negotiations will be complete by December 2016. Thereafter detailed planning proposals will be brought forward in 2017 with a view to commencing on site in 2018/19 and completion on site by 2025 .
H46A	Land at Gallows Hill	630	450 were granted planning permission in January 2016	<p>The eastern part of the site has outline planning permission for 450 dwellings. Detailed proposals are currently being worked up and it is anticipated these will be submitted later in 2016. It is assumed that the first deliveries will be achieved in 2018/19 and with a delivery rate of 85-95dpa the site will be complete by 2023.</p> <p>The western part of the site does not have planning permission but is currently being promoted with a view to a planning application being submitted during 2016. It is assumed that the first deliveries will be achieved by 2019/20 with completion on site by 2023.</p>
H46B	The Asps	900	Granted planning permission in January 2016	Work is progressing to bring this site forward as quickly as possible. The site promoters have indicated they intend to achieve the first completions during 2019/20 with a build out rate of 100dpa. The anticipate completion on site by 2027/28.
H02	Land South of Harbury Lane (including former sewage works)	1820	<p>215 at former sewage works no pp</p> <p>720 at Harbury Gardens with pp (including rm for part)</p> <p>785 at Lower Heathcote Farm with pp (including rm on part)</p> <p>100 additional at Lower Heathcote Farm without pp</p>	The vast majority of this area has planning permission and work has started on site at both Lower Heathcote Farm and Harbury Gardens. Across the different parts of the site it is anticipated that up to four housebuilders may be active at any one time and that build out rates are therefore likely to vary between 50 and 200dpa across the plan period. Taking account of the current progress on site and the advice of housebuilders and site promoters, it is expected that the site will be built out by 2026
H03	Land at Whitnash East	500	<p>300 dwellings included in the submitted Local Plan.</p> <p>200 proposed in 2016 modifications</p>	Whilst the site does not currently have planning permission, the site developers are currently working on proposals for a planning application and have indicated an intention to achieve the first completions on site in 2019/20, with a build out rate of 100-120dpa. The aim to complete on site by 2024.

Alternative 5 Year Housing Land Supply Calculations

A Calculations of 5 year requirement from 2018 and 2019

THE FIVE YEAR REQUIREMENT AT 31ST MARCH 2018	
	Dwellings
Annual Requirement	932
Requirement 01/04/2011 to 31/03/2018 (7yrs x 932)	6524
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/17 (inc. 10% deduction)	-1157
Less estimated completions 1/04/17 to 31/03/18	-1293
Sub Total (shortfall since 2011)	1972
Five Year Requirement 01/04/2018 to 31/03/23 (5yrs x 932)	+4660
Sub Total	6632
Plus 20% Buffer	+1326
Five Year Requirement 1/4/17 - 31/03/23	7958

THE FIVE YEAR REQUIREMENT AT 31ST MARCH 2019	
	Dwellings
Annual Requirement	932
Requirement 01/04/2011 to 31/03/2019 (8yrs x 932)	7456
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/17	-1157
Less estimated completions 1/04/17 to 31/03/18	-1293
Less estimated completions 1/04/18 to 31/03/19	-1749
Sub Total (shortfall since 2011)	1155
Five Year Requirement 01/04/19 to 31/03/24 (5yrs x 932)	+4660
Sub Total	5815
Plus 20% Buffer	+1163
Five Year Requirement 1/4/19 - 31/03/24	6978

B Alternative calculation assuming delivery of Coventry's need is spread across whole Plan period

This approach would apply a requirement of 720dpa (in line with the Joint SHMA) from 2011/12 to 2014/15 (4 years) and would spread the balance of 212dpa across the remainder of the Plan Period. Using this approach would give a 5.51 year supply at the outset by changing the requirement as follows:

ALTERNATIVE FIVE YEAR REQUIREMENT AT 31ST MARCH 2017	
	Dwellings
Annual Requirement 2011/12 to 2014/15 (4 years)	720
Annual Requirement (2015/16 onwards)	993
Requirement 01/04/2011 to 31/03/2015 (4yrs x 720)	2880
Requirement 1/04/15 to 31/3/17 (2yrs x 993)	1986
Less completions 01/04/11 to 31/03/16	-2102
Less estimated completions 1/04/16 to 31/03/17	-1157
Sub Total (shortfall since 2011)	1607
Five Year Requirement 01/04/2017 to 31/03/2022 (5yrs x 993)	+4965
Sub Total	6572
Plus 20% Buffer	+1314
Five Year Requirement 1/4/17 - 31/03/22	7886

APPENDIX 5

Affordable Housing

SITES COMPLETED OR ONSITE WITH A PROPORTION OF AFFORDABLE HOUSING (April 2013 to present)						
Year of completions	Scheme address	Affordable completions to 31/3/16	Further affordable expected	Total affordable	Total homes	Percentage affordable
2013/14	Edinburgh Gardens, Leamington	10	0	10	10	100%
2014/15	Trinity Storage site (aka Monarch Gardens)	72	0	72	72	100%
2014/15 & 2015/16	Academy Drive (SW Warwick)	30	0	30	76	39%
2014/15 & 2015/16	Aylesford School (SW Warwick)	68	0	68	171	40%
2014/15	Henley Court	7	0	7	7	100%
2014/15	Bourton Court	5	0	5	5	100%
2014/15	Queensway Court Extra-Care	178	0	178	178	100%
2015/16	Great Field Drive (SW Warwick)	21	0	21	70	30%
2015/16	Fire Station, Warwick	22	0	22	22	100%
2015/16 & onsite	Chesterton Gardens, Whitnash	33	51	84	209	40%
2015/16 & onsite	Mallory Grange, Bishop's	13	99	112	280	40%

NB Old planning permission when policy was 30%

Tachbrook						
2015/16 & onsite	Hawkes Meadow, Warwick	24	64	88	220	40%
2015/16 & onsite	The Fairways, Whitnash	10	34	44	111	40%
2015/16 & onsite	Nursery Meadow, Barford	1	23	24	60	40%
2016/17 on site	Sayer Court, formerly Fetherston Court	0	81	81	81	100%
2016/17 on site	Newbold Centre, Leicester St	0	31	31	31	100%
2016/17 on site	Wharf Street, Warwick	0	15	15	15	100%
2016/17 on site	Land east of Radford Semele	0	24	24	60	40%
2016/17 on site	Warwick Gates Care Village, Earl Rivers Avenue, Warwick	0	24	24	118	20%
						AH partly off-site
2016/17 on site	Harbury Gardens, Bishop's Tachbrook	0	80	80	200	40%
2016/17 on site	Lower Heathcote Farm	0	314	314	785	40%
2016/17 on site	North of Oakley Wood Rd, Bishop's Tachbrook	0	60	60	150	40%
2016/17 on site	Opus 40, Warwick	0	34	34	85	40%
2016/17 on site	Sydenham Drive, Leamington	0	88	88	143	62%
TOTAL		494	1022	1516	3159	48%

SITES WITH 10 OR MORE UNITS APPROVED WITHOUT AFFORDABLE HOUSING (April 2013 to present)

Year of permission	Scheme address	Total homes	Comments
2014/15	36 Warwick Street, Leamington	12	Conversion scheme - viability accepted, no affordable requirement
2014/15	Monastery of Poor Clares, Baddesley Clinton	15	Conversion scheme - viability accepted, no affordable requirement
2014/15	9 Clarendon Place, Leamington Spa	13	Conversion scheme - viability accepted, no affordable requirement
2014/15	Cape Road, Lower Cape, Warwick	30	Major flood attenuation

measures - viability
accepted, no affordable
housing

SITES WHERE A COMMUTED SUM HAS BEEN ACCEPTED IN LIEU OF AFFORDABLE HOUSING (April 2013 to present)

Year of permission	Scheme address	Total homes	Comments
2013/14	Parmiter House, Leamington	51	Private sheltered housing scheme. Commutated sum £225,554 paid.
2013/14	2-22 Northgate Street	18	Major conversion scheme. Commuted sum of £99,100 due before occupation of first unit.
2015/16	Lord Leicester Hotel, 17-19 Jury Street, Warwick, CV34 4EJ	21	Major conversion scheme. Commutated sum of £40,000 due on commencing work.
