

5. Plan policies

5.1 How social, environmental and economic problems were considered in developing the policies

Planning decisions have traditionally been based on the idea of 'balance'. The economic and social advantages of a proposal, for example, might be judged to be more important than the local environment, so the development is approved. The concept of sustainable development seeks solutions where there is a net gain (or at least neutral effect) for the social, environmental and economic interests of the area. Integrated policies can help achieve this. The aim should be to provide policies that avoid tensions with other policies. Testing the policies against the appraisal objectives helps identify such tensions.

5.2 Results of the Appraisal

The results of the appraisal are summarised below.

5.2.1 Chapter 3: Core Strategy

The core strategy outlines the key objectives to which the plan policies seek to contribute. These have been structured according to the four main themes of the UK Government Sustainable Development Strategy. Whilst the section is prefaced with the joint vision from the Warwick District Community Plan 2001-2003, it is unclear how the Plan objectives or policies link explicitly to the realisation of this vision.

The objectives provide a comprehensive local interpretation of sustainability for the area and the statement that the Plan attaches equal weight to them is welcome as achieving balancing within planning decisions is a key outcome. However, the origin of the objectives and their links to the Community Plan vision could be detailed more explicitly.

Section 3 states that the nature and scope of the policies are influenced by the plan objectives and that much of the text that accompanies individual policies relates to the objectives to some degree. However, there is a potential gap in realising the objectives. It is unclear how specific development proposals should relate their contribution towards these objectives although the links with plan policies are explicit. **Potential consideration could be given to requiring a sustainability appraisal of a development** of specific size or that has significant impacts (that meet the criteria of Schedule 1 of the SEA Regulations 2004: Criteria for determining the likely significance of effects on the environment). The sustainability appraisal would require an assessment of the developments contribution to the plan objectives (or the SA objectives used within this SA Report). Such appraisals are employed by other local planning authorities are a useful means to ensure that development proceeds consistent with the Plan objectives as well as the plan policies.

5.2.2 Chapter 4: Development Policies

There have been a number of significant changes to the policies in this chapter of the local plan. The inclusion of a new policy **DP12a (Renewable Energy)** and a number of amendments to existing policies are particularly welcomed.

Policy **DP1 (Layout and Design)** could be strengthened by including statements to encourage improvement as well as to prevent harm through design and layout (for example clause (j) of the policy). The positive impacts of the policy also rely on implementation alongside other policies in the plan, and the reasoned justification could be improved with more explicit greater reference to these, such as DP11, 12 and 13. The promotion of sustainable design through the adoption of recognised standards such as Eco-homes or BREEAM could be useful additions to either the accompany text in this policy or that of DP12 Energy Conservation.

Policy DP2 (Amenity) includes reference to ‘unacceptable adverse impacts’, however, further clarification in the supporting text would be useful to describe what is meant as an unacceptable impact.

Policy DP3 (Natural and Historic Environment and Landscape) and **DP4 (Archaeology)** both contribute to the protection of archaeological and historic assets. The inclusion of the need to enhance as well as protect in policy **DP3** is particularly welcomed.

DP5 (Density) concerns proposals to permit development that meet net density targets. Such proposals are expected to have a positive impact on the objective that seeks to protect and improve land quality by reducing the demand for land for building. Where more people live close to amenities, it is also expected to reduce the need to travel, improve economic vitality and improve access to services. However the policy may create additional pressure on open space, other amenities and infrastructure in the local area. There is also potential to create additional neighbourhood tensions due to the proximity of occupants. Consideration should be given to ensure that the management of these issues through cross-referencing to other policies be incorporated into the accompanying text.

Policy **DP7 (Traffic Generation)** allows for increases in traffic, but is intended to minimise the negative impacts associated with such increases. These negative effects could include impacts on health, air quality, and climate change. The policy could be strengthened with an explicit reference to the negative effects in the reasoned justification. It might also benefit with cross-references to DP6 (Access), DP9 (Pollution) other policies that prioritise reductions in need to travel and use of sustainable transport.

Policy **DP9 (Pollution Control)** helps to prevent harm to sensitive receptors, and has a positive impact on the protection of the natural environment and human health and amenity. However, it does not recognise the scope for improvements in pollution through development, and the policy could be strengthened by including the potential for positive contributions. The supporting text of this policy should make reference to PPS23: Planning and Pollution Control.

Policy **DP10 (Flooding)** helps to minimise the likelihood and impacts of flooding and the link to policy **DP11 on drainage** helps to strengthen these positive impacts. This policy has had significant changes to it which have helped to strengthen these benefits.

Policy **DP11 (Drainage)** (b) could be amended to make reference to increases in flood risk (rather than flooding). It could also include specific reference to the effects of climate change.

There is no reference in this chapter to water efficiency and measures to reduce water consumption. This could be incorporated into policies **DP10, DP11 or DP 12**.

Policy **DP12a (Renewable Energy)** is welcomed. Reference is made to PPS22: Renewable Energy, the Council may also wish to refer to the Companion Guide to PPS22.

Consider referring to Community Safety as well as Crime Prevention in **policy DP13 (Crime Prevention)**. Furthermore, consider making specific reference to the opportunity to incorporate safety and security measures into the refurbishment of existing developments.

5.2.3 Chapter 5: Sustaining Communities

Policy **SC1 (Securing a Greater Choice of Housing)** requires a mix of development, but for many of the sustainability objectives, the impacts will depend on the particular circumstance of development and on implementation of this policy in conjunction with others such as DP1, DP6, DP12, DP13, SC9 and UAP1. Reference to these policies could be included in the reasoned justification.

Policy **SC4 (Supporting Cycle and Pedestrian Facilities)** should help to encourage travel by cycle or foot, with associated positive impacts on reducing demand for travel by car and transport emissions. The policy could be strengthened by encouraging developments to incorporate cycle and pedestrian facilities, or by cross-reference to relevant policies such as DP6.

Policy **SC8a (Managing Housing Supply)** makes provision for the development of up to 8,000 dwellings in the district between 1996 and 2011. Clearly, there is a strongly positive contribution to the objective to meet the housing needs of the whole community. However, the environmental impacts of this policy are uncertain as they are dependent on the specific nature of individual developments and on the implementation of this policy in conjunction with others such as DP1, DP6, DP12, DP13, SC9 and UAP1.

Policy **SC10 (Sustainable Transport Improvements)** could be strengthened by referencing policies to sustainable design to ensure these opportunities are maximised. We welcome the inclusion in the policy of seeking contributions towards footpaths and cycleways.

5.2.4 Chapter 6: Urban Area Policies

Policy **UAP1 (Directing New Housing)**, **UAP2 (Directing New Employment Development)** and **UAP3 (Directing New Retail Development)** may benefit with cross-references to a number of other policies including DP10, DP11, DP12, DP13, SC9, SC8a and SC7/7a.

5.2.5 Chapter 7: Town Centre Policies

These policies have only had a number of minor changes since the first draft of the local plan. Policy **TCP3 (Providing for Shopping Growth in Leamington Town Centre)** may benefit from cross-reference to policy **DP14 (Accessibility and Inclusion)**. The policy may also wish to refer to the provision of cycleways as well as pedestrian routes.

A number of policies within this chapter refer to protecting the role of the town centre and managing changes of use.

5.2.6 Chapter 8: Rural Area Policies

The supporting text of this chapter should make reference to Planning Policy Statement 7: Sustainable Development in Rural Areas.

Policy **RAP2 (Directing New Housing)** may benefit from cross-references to RAP 5, 6 and 8.

Policy **RAP6 (Housing for Rural Workers)** limits rural development, thus protecting the feel and character of the area and the natural environment. However, by allowing development according to specific requirements and certain conditions, the policy also contributes to the sustainability objectives relating to meeting housing needs and provision of affordable housing. The links between this policy and RAP2 and development policies such as DP11 and 12 should be reinforced to further add to positive impacts.

Policy **RAP7 (Directing New Employment)** and **RAP8 (converting Rural Buildings)** both contribute favourably to the sustainability objectives, particularly relating to economic growth and enhancing the vibrancy of rural communities and also contributing to provision of employment opportunities. The policy should be linked clearly to RAP8, 8a and 9 and specific development policies.

Policy **RAP10 (Safeguarding Rural Roads)** would benefit from links to policy DP6 and other development policies.

5.2.7 Chapter 9: Designated Area Policies

The reference to cumulative impacts in the supporting text of Policy **DAP2 (Protecting the Areas of Restraint)** is welcomed. Similar reference to the importance of accounting for cumulative impacts could also be added to the supporting text of Policy **DAP4 (Protecting Nature Conservation Geology and Geomorphology)**.

There are a number of policies which help to protect the historic and built environment. These policies are considered to be fully appropriate to achieve this aim.

5.2.8 Chapter 10: Site Specific Policies

Each of the sites under Policy **SSP1 (Employment Allocations)** may benefit from the production of Supplementary Planning Guidance (for those where this guidance does not already exist) as this would assist in identifying further planning restraints and opportunities.

Policy **SSP2 (Major Developed Sites in the Green Belt)** could consider ways in which the net loss of green belt (and open space) could be minimised, possibly through the creation/allocation of additional green belt and open space.

Policy **SSP3 (Stoneleigh Park)** recognises the importance to the rural economy of the district of the site; however, comment is also made in the accompany text to the potential for development to have negative impacts on the environment, the sensitivity of the surrounding environs and the potential effects on the local community. Whilst the surrounding text makes clear reference to SSP2, the management of the potential adverse impacts could be further enhanced through cross reference to the Development Policies in Chapter 4.

Policy **SSP7 (Coventry Airport)** concerns the permission of development of the Airport within an existing defined area. This policy highlights the inherent tensions in completing such an appraisal in that the process highlights that the policy scores poorly in a number of areas (such

as the promotion of sustainable transport, improving air quality and reducing greenhouse gas emissions). However, the policy does make a significant positive contribution to promoting economic growth in the area through the indirect provision of employment opportunities. Clause d) of the policy states that the number of movements should not significantly exceed 2 million per annum. It is considered useful if the policy could qualify the term significance in this regard. The use of impacts assessments and mitigation measures are welcome as the link to accessibility by modes other than the car.

Policy **SSP8 (Hatton Country World)** would be strengthened if it were to include all development types, and not just 'retail development'. The policy makes appropriate cross references in the supporting text to other policies including DAP1, DAP3 and RAP10.

5.3 Effects of plan policies on overall objectives

The following table summarises the impacts of all of the plan policies against the issues of concern.

Table 5.1 Summary of the impacts of the Local Plan

Air	<p>A number of the policies have positive impacts on air quality by protecting the natural environment or discouraging use of private transport.</p> <p>Policies on sustainable transport and access include DP6, SC3, SC4, SC10, SSP4 and SSP5, and should help to reduce risks of air pollution from traffic. Policies promoting and protecting local facilities, including SC7, SC11, RAP11, and RAP12, should also help to reduce demand for travel. Other policies supporting development in town centres, such as UAP2, UAP3, UAP4 and UAP5, should also help to improve access by sustainable transport, with associated benefits for air quality. In all of these cases, the policy helps to offer alternatives to private transport to some extent, although the impact on air quality will depend on response to the policies.</p> <p>Policies helping to protect the environment, prevent pollution and protect open spaces may also help to improve air quality. These include DP9 and DAP1 amongst others.</p> <p>However, some of the policies have uncertain or potentially negative impacts on air quality.</p> <p>Policies that allow development may also be associated with increases in transport, even though this may be limited in some way. These policies include DP5, TCP1, TCP2 and TCP3. Policy DP7 aims to limit traffic growth, but any increase may have a negative impact on air quality. The policies on tourism (UAP7, UAP8, and UAP9) and renewable energy (DP12a) development may also lead to an increased demand for travel, although this will be determined by the way in which such development occurs.</p> <p>Other policies that may have negative impacts by encouraging travel by private car include those allowing for development in the greenbelt, including SSP2, SSP3, and SSP6, where access by public transport or walking may be more limited. Policies UAP6 and SSP7 allow development that is expected to increase transport emissions by the nature of the activity.</p>
Landscape and Soil	<p>Many of the policies have an impact on landscape and soil by encouraging use of previously developed land, protecting greenfield sites from development or encouraging consideration of sites sequentially. These policies include DP3, DP5, SC7, UAP1-3, UAP6, DAP1-2, DAP4, RAP2, RAP11-12, RAP15-16, and SSP1-5. Encouraging development on brownfield sites helps to protect land quality and also reduces impacts on open areas and landscapes. This is also supported by policies that encourage increased density (DP5), and promote re-use of existing development (SC2, SC7a).</p>

Other policies helping to protect the landscape include those requiring or encouraging incorporation of existing landscape features and countryside character, including DP1, DP3, DP10 and RAP10. Policies protecting open space, including SC5 and SC11, will also help to support visual and landscape impacts. In addition, DP2 and RAP8 explicitly address issues of visual amenity.

Soil will also be affected by policies with impacts on pollution or contamination, including DP9 and DP11.

However, some of the policies have more uncertain impacts. These include SC8, which has uncertain impacts on the visual landscape, SSP6, which includes development of greenfield land, and DP5, where there may be contradictory impacts of increasing density on landscape.

Biodiversity (Fauna and Flora)

A number of the policies have impacts on biodiversity and the natural environment, particularly by use of previously developed land, and restricting development on greenfield land, the green belt and areas of restraint. These policies include DP5, SC7, SC8a, UAP1, RAP2, DAP1, DAP2, DAP4 and SSP2. Policies protecting open space such as SC5 and SC11 may also have similar positive impacts on biodiversity. However, those policies that allow for development of greenfield land, such as SSP1 and SSP6, may have negative impacts.

In addition to policies related to greenfield sites, some policies directly address effects on the natural environment, including biodiversity. Policies including DP1, UAP7 and RAP10 require prevention of harm, while DP3 goes further by considering protection and enhancement. Policies that address pollution control such as DP9 and DP11 are also considered to have a positive impact by preventing harm.

However, for a small number of policies, the impact on biodiversity is uncertain. This includes SC3, where it is not apparent whether the natural environment is included in the scope of the policy, and SC2 and UAP2, where the impact will depend on implementation of the policy.

Climatic factors

The main relationship between the policies and climate factors is through impacts on travel and transport. Policies including DP5, SC7, SC7a and SC11 help to reduce travel demand, particularly through location of housing facilities, thereby helping to reduce emissions of greenhouse gases. In addition, other policies including DP7 and DP8 have an uncertain impact on climate factors because although they allow for increased private transport the policy also requires minimisation of negative impacts. However, policies such as SSP6 and SSP7 support road and air traffic respectively and therefore may have negative impacts. Policies allowing development and the greenbelt including SSP2 and SSP3 may also have negative impacts by encouraging travel by private car.

A small number of policies also address domestic and commercial energy use, with DP12 (& DP1 to some extent) encouraging reduced energy consumption, and DP12a allowing for development of renewable energy. In addition to affecting contribution to climate change, policies such as DP10 and DP11 on flooding and drainage have a positive relationship by reducing risk of negative impacts associated with potential effects if climate change.

Cultural heritage including architectural and archaeological heritage

Many of the policies support the built and historic environment, through explicit protection of features or by encouraging appropriate building and development.

Policies such as DP1, DP3, DP4, DAP6-11 include protection of the historic environment within the policy. Others, such as DP12a, require prevention of damage to the historic environment. In both cases, the policy has a positive impact on the cultural heritage of the district.

Policies that protect the existing character of particular areas (for example in town centres, this includes TCP1, TCP2 and TCP5 and for rural areas includes RAP8 and RAP9) will also have a positive impact on the cultural heritage of the area. Policies that support a mixture of developments in new buildings (including SC1, TCP7 and TCP8) will also have positive impacts. These will be supported by the impacts on townscape associated with good design, including DP1, DP6, SC13, TCP13, RAP2, RAP3, RAP6 and RAP7. However, the impacts of design may be uncertain as a number of policies require a balance between different objectives, including overall design DP1, density DP5, energy conservation DP12, and crime prevention DP13. The impact of density on townscape is also uncertain as it will vary depending on the existing character of the rural or urban area, and the nature and design of the development that takes place.

Human health	<p>Human health may be affected by policies protecting and enhancing open space, which can have a positive impact on physical and emotional health. Policies related to open space include DP2, DP3, SC5, SC11, RAP13, DAP1, DAP2 and DAP4. Other policies look to protect and enhance provision of more formal sports facilities, improving access to sports with benefits to human fitness and health. These include SC6, SC11 and UAP9. Human health may also be supported by policies encouraging walking and cycling, such as DP1, DP6, SC4 and SC10. Provision of health facilities such as doctors and dentists' surgeries, can also have a positive impact, through policies SC7 and SC12.</p> <p>As for other topics with impacts through transport, there is some uncertainty over the impacts of policies that allow for traffic growth, including DP7 and SSP6. There may also be negative impacts on human health from SC8, although any development under this policy must adhere to government health guidelines.</p>
Material assets	<p>Material assets include the natural resources used in the construction and use of buildings and a number of the policies have implications for resource use. This includes policies encouraging reuse of existing buildings and facilities and thereby minimising the need for the new buildings such as DP5, SC6 and SC7a. On the other hand policies such as TCP3 that allow for development may increase demand for raw materials. Policy SC8a has uncertain impacts by allowing development, but potentially limiting the number of houses below the level that would occur unconstrained.</p> <p>Where development takes place, some of the policies impacts by encouraging good design and resource use. Sustainable resource use in buildings is encouraged by policies related to water recycling (SP11), energy minimisation and use of renewable energy (DP12 and DP12a) and sustainable transport (including SC4 and SC10).</p> <p>For some policies the impacts on material assets are uncertain and will depend on the way in which the policy is implemented. This includes many of the UAP policies.</p>
Population	<p>Population covers a wide range of impacts on people, and as such, the Plan policies are associated with population in a variety of ways. This includes through impacts on the natural and built environment, which may encourage outdoor recreation and health, or may increase spending in the area by attracting tourists for example. Issues of health and the natural and built environment are summarised above and not considered again here.</p> <p>Many of the policies affect economic vitality through influencing the nature and location of development. Policies affecting the mixture of development and retention of open space within the built environment include DP2, SC5, SC7, UAP2-5, UAP7, UAP9, TCP1, TCP10, RAP11 and DAP7. Encouraging a balanced mix of commercial, domestic and retail development should help to maintain economic vitality. In addition, there are additional policies encouraging investment in town centres, including TCP3-9 and TCP13. The design and layout of town centres is affected by DP1, DP5, DP13 and TCP2, and this could add to the impacts of other policies by improving the economic environment within the towns.</p> <p>Transport access may also influence economic vitality through policies including SC3, RAP10, SSP4, SSP5, and SSP7. Access issues are considered further below as of interest for community wellbeing beyond economic vitality. Congestion may be reduced as a result of policy DP7, although the influence of DP7 on economic growth is uncertain as the relationship between transport and economic growth is influenced by many factors.</p> <p>Economic vitality may also be influenced through provision of employment land and buildings, and this is included within policies such as SC2, RAP7, RAP8a, RAP9, RAP12, and SSP1-3. However, other policies limit development, for example in the greenbelt, and this may restrict development that supports economic growth. These policies include DAP1, DAP2 and DAP4. Associated with this, policy UAP2 may displace businesses.</p> <p>A number of the policies in the plan address issues of access, both to employment and facilities, and accessibility. These may have a positive impact on the population by providing opportunities and access to services. Policies affecting access include DAP1, DP5, DP6, SSP4 and SSP5, which concern access in general, SC2 and SC10, which impact on access to employment, and SC3-4, SC10-12, UAP5, UAP7, UAP9, TCP2 and TCP3, which affect access to facilities. DP14 relates to accessibility, which could improve access to services and facilities, but may have negative impacts on those businesses or organisations who find it hard to adapt to the requirements.</p>

In addition to affecting access to facilities, policies including SC7a and RAP13 affect the provision of such facilities.

One of the key issues in the district is housing need, affordability and provision, and a number of the policies affect housing. These include providing for a mix of housing development, which is influenced by policies including SC1, UAP1, TCP10 and TCP11. Policies that have a positive impact on meeting housing needs include SC1, SC8a and RAP6, as well as those supporting an increase in the provision of affordable housing, such as SC1, SC9, RAP2 and RAP5. However, some of the policies have a more uncertain impact on the provision of housing through restricting development. These include policies that constrain building on greenfield and greenbelt sites, including DAP1, DAP2 and DAP4.

In addition to policies affecting access and affordability, other policies that may have a positive impact on community wellbeing include DP13 and TCP12, which should help to improve the design and risks of crime and anti-social behaviour. Density may have a more uncertain impact on community wellbeing by improving access to facilities but reducing opportunity for open spaces and tolerance of neighbours.

5.4 In summary

In broad terms the Plan performs well against the sustainable development objectives and it provides a robust framework from which to progress sustainability within the District. Many of the individual plan policies make a positive contribution towards specific sustainable development objectives and the proposed changes refer predominately to improvements in the accompanying text. Through the completion of this SA and the earlier appraisal undertaken in 2003, the Council has ensured that through the various iterations of the Plan, its performance and contribution towards a more sustainable future is one that has improved

The appraisal process has indicated that the Plan contains an adequate range of policies with all relevant sustainability issues covered. It is apparent that Section 3 of the Plan includes a good understanding of the concept of sustainable development and that this is articulated through the plan objectives. It is welcome that the Plan states that it gives equal weight to these objectives and does not focus on one particular aspect of sustainable development, e.g. the environment or the economy but adopts an integrated view. Whilst it is clear that the Plan provides a clear local interpretation of the sustainable development, consideration could be given to how the Plan objectives are applied in practice.

Compared to the first draft of the Warwick District Local Plan, the proposed changes have strengthened the policy framework for achieving sustainable development. In particular, by promoting:

- a clearly articulated spatial strategy that directs development around existing Towns;
- greater attention to the issues of flood risk and their assessment within development;
- higher standards in design, for example the use of sustainable drainage systems;
- provision for renewable energy;
- a stronger commitment to alternative modes of transport;
- mixed use development and more effective use of land;

- greater emphasis on protecting and enhancing existing designated sites; and
- strengthening the role of rural settlements and rural service centres.

The role of the Plan is not to achieve sustainability on its own, but to make the land use planning contribution to sustainable development which needs to be implemented alongside other policy documents. The sustainability appraisal process has provided the opportunity for the sustainability issues associated with the Plan to be considered by policy makers, decision makers and the wider community. Whilst some issues remain, and some of these will be inherent within the trade off between the elements of sustainability, the revised draft Warwick District Plan provides a robust framework from which to progress sustainability objectives within the District.