



**Warwick District Council  
Publication Draft Local Plan**

**Sustainability Appraisal Report  
Non-Technical Summary**

**April 2014**

*enfusion*



# Warwick District Council Publication Draft Local Plan

## Sustainability Appraisal Report Non-Technical Summary

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## NON-TECHNICAL SUMMARY

### INTRODUCTION

1. This is the summary of the Sustainability Appraisal Report for Warwick District Council's Publication Draft Local Plan. It describes how the Sustainability Appraisal (SA) process was used to assist in planning for the development and the use of land, as required by planning legislation and National Planning Guidance. The SA assists sustainable development through providing the opportunity to consider reasonable alternatives in which the plan can contribute to improving environmental, social and economic conditions as well as providing the opportunity to identify and mitigate any potential adverse effects that the plan might otherwise have had.

### WARWICK DISTRICT COUNCIL'S DRAFT LOCAL PLAN

2. The Local Plan will guide future development in the District for the next 15 years. It sets out how much new development (land for housing and employment) is needed and where this development should take place as well as provides information about the infrastructure (roads, schools, open spaces, etc) needed to support new development.
3. The Local Plan includes a Vision for the District as follows:  
  
The Council's Vision for Warwick District (which we share with our partners), as set out in the Sustainable Community Strategy, is "to make Warwick District a Great Place to Live, Work and Visit".
4. The Council and its partners are trying to deliver this vision together through the Sustainable Community Strategy. The Local Plan aligns with the Warwick District Sustainable Community Strategy by focusing on the following strategic priorities:
  - Supporting Prosperity: seeking to enable the District's economy to prosper by providing opportunities for businesses to grow and relocate is an important priority for the Local Plan. To achieve this, the Plan sets out policies and proposals to support employment, vibrant town centres and a strong cultural and tourism offer.
  - Providing the homes the District needs: providing opportunities to deliver the housing needed to support the District's changing and growing population is central to the Plan, ensuring this is high quality and affordable, at the same time as meeting the needs of everyone including those with specialist housing needs.
  - Supporting sustainable communities (including health and wellbeing and community safety): there are many aspects to the delivery of sustainable communities including the design and layout of new development; provision of infrastructure; spaces and services to enable healthy and safe lifestyles; regeneration and enhancement of existing communities and environments and the protection of the natural and built environment.

5. In the Local Plan, these strategic priorities, are supported by a Spatial Strategy which seeks to:
  - maximise use of brownfield sites;
  - only bring forward greenfield sites in sustainable locations;
  - avoid coalescence between settlements;
  - protect important heritage assets;
  - protect areas of high landscape value and important natural assets;
  - focus employment, retail, leisure and cultural activities in town centres; and
  - only develop sites in the Green Belt where exceptional circumstances can be justified.
  
6. The Local Plan's objectives link the Local Plan strategy, with the specific proposals set out within the Local Plan Chapters. The objectives provide the framework to deliver sustainable development by balancing social, economic and environmental imperatives and where possible enhancing all three. The Objectives are as follows:
  - Objective 1: Providing sustainable levels of growth in the District.
  - Objective 2: Providing well-designed new developments that are in the right location and address climate change
  - Objective 3: Enabling the District's infrastructure to improve and support growth
  
7. The Publication Draft Local Plan contains 20 development strategy policies that set out the level and location of growth, 15 housing policies, 31 policies for delivering prosperous communities, 45 policies for sustainable communities and 2 infrastructure policies.

#### **SUSTAINABILITY APPRAISAL & STRATEGIC ENVIRONMENTAL ASSESSMENT**

8. Planning legislation requires that a Local Plan is subject to a SA, a systematic process that is designed to evaluate the predicted social, economic and environmental effects of development planning. European and UK legislation require that the Local Plan is also subject to a Strategic Environmental Assessment (SEA), a process that considers the effects of development planning on the environment. Government Policy and Guidance advises that these two processes should be carried out together and outlines a number of stages of SA work that need to be carried out as the Local Plan is being prepared:
  - Stage A: Setting Context and Objectives, establishing the Baseline and Deciding the Scope
  - Stage B: Developing and Refining Alternatives and Assessing Effects
  - Stage C: Preparing the SA Report
  - Stage D: Publish and Consult on the SA Report and the Local Plan
  - Stage E: Post Adoption Report and Monitoring

9. The SA of Warwick District Council's Draft Local Plan has been prepared in accordance with the requirements for both SA and SEA.

### **SUSTAINABILITY CHARACTERISTICS OF THE LOCAL PLAN AREA AND LIKELY EVOLUTION WITHOUT THE PLAN**

10. Baseline information about the Local Plan area has been collected and updated since the onset of the plan-making and SA processes. Relevant and sufficient information on the present and future state of the area has been collected in order to adequately predict the potential effects of implementing the Local Plan on the area. Baseline analysis provides the basis for making judgments about how the emerging content of the Local Plan might hinder or progress objectives for sustainable development.
11. Warwick District covers an area of some 283 km<sup>2</sup>. The District lies within the heart of Warwickshire to the south of the city of Coventry and is surrounded on all sides except for the South East by Green Belt. The District comprises four main towns including Royal Leamington Spa, Warwick, Kenilworth and Whitnash with approximately 90% of the district's population live in these urban areas with the remaining 10% living in a number of relatively small villages. These main centres contain a wide range of different types of housing although there are affordability issues.
12. The total estimated population in 2011 was 137,700. The population has grown from 124,000 in 2000 - an 11% increase - and is forecast to continue to grow, with potentially a 17% growth over the next 15 years. Compared to other parts of Warwickshire, a higher proportion of the District's population is of working age. The highest rate of projected population growth in the future is expected to be amongst those aged 65 and over.
13. The District has a diverse population, with a high proportion of non-white British residents (15% of the total population) compared to other Districts in the County. Relative to the West Midlands as a whole, the District has a strong local economy, with a skilled population and higher than average levels of productivity and earnings compared with regional and national averages. There are good road and rail links with surrounding major urban areas.
14. The District's relative prosperity masks some significant areas of deprivation. In particular, Lillington lies within the most deprived 20% of Super Output Areas nationally. Further, the changing needs of business means that some of the District's traditional industrial areas require regeneration, with many of these areas located alongside the Grand Union Canal in Warwick and Royal Leamington Spa. The District's 40km of canal offer particular opportunities for recreation, regeneration and environmental improvement.
15. The three main town centres of Royal Leamington Spa, Kenilworth and Warwick provide a focus for retail, leisure and employment. The unique and high quality environments of these town centres has meant that they have been relatively resilient to the recent recession and the competition from online retailing and other retail areas and town centres. Despite this there has been an increase in vacancy rates and a fall in rents in some of parts of the

town centres indicating a need to continue to focus investment in these areas.

16. The District also contains a large number of environmental assets of mainly national or local importance including features of historic interest, geological/geomorphological significance and particular habitats of nature conservation interest. Areas of historic or environmental importance in the District include:
  - 7 Sites of Special Scientific Interest
  - 15 Sites of Importance for Nature Conservation
  - 2,145 Listed Buildings
  - 29 Conservation Areas (covering 4% of the District)
  - 11 Registered Parks and Gardens (covering 4% of the District)
17. Air quality and traffic congestion, particularly in the main towns, are key issues. However, the District produces the lowest amount of waste per head compared to the other local authorities in Warwickshire. In addition, in terms of measuring well-being, Warwick District emerged as having a smaller number of areas where people are estimated to have low well-being in Warwickshire as a whole and the health of residents is generally better than in other areas of the County. The District also has the lowest overall recorded crime rates in Warwickshire.
18. Without the Local Plan existing trends are likely to continue and there would be a lack of co-ordination between where new development takes place and where it is needed. Development would not necessarily be directed towards the areas with the least constraints, which could have adverse effects on sensitive receptors such as the natural environment and heritage.

### **KEY SUSTAINABILITY ISSUES, PROBLEMS AND OPPORTUNITIES**

19. Plans and programmes that could affect the Local Plan were reviewed and considered together with information collected relevant to the characteristics of the District. From these studies the key sustainability issues and opportunities for the Local Plan were identified as follows:
  1. The effects of the recent recession and not knowing how the local economy will change in the future.
  2. Relatively high house prices limiting local people's ability to buy or rent property in the area, creating the need for more affordable housing for families in towns and villages. Another issue is the need to provide more housing to meet people's needs in the future, particularly those of older people.
  3. The economic strength of the town centres of Warwick, Leamington Spa and Kenilworth, and the threat to these from retail and leisure developments elsewhere.
  4. The size and condition of existing community facilities and services (particularly schools and health-care facilities) and whether they can meet current and future needs.

5. People's general health and well-being, and the need for people (particularly teenagers and young people) to have access to sport and cultural experiences, such as cinemas and community events.
  6. Road congestion and air pollution, particularly around the main junctions along the A46 and M40, the routes into the towns, and within the town centres.
  7. The threat of flooding of homes and businesses in some areas, particularly where surface water may flood towns and villages, and the concern that the threat of flooding will increase because of climate change.
  8. Areas of poverty in Warwick and Leamington Spa.
  9. The pressure for new development threatening the high-quality built and natural environments in the district, particularly historic areas, and the cost of maintaining historic buildings and areas.
  10. Crime and the fear of crime, particularly in town centres, and the need to protect the community from harm.
  11. The Government's planned High Speed 2 rail line and its possible effects on the area. (The Government is consulting the public separately on this issue.)
20. The baseline and review of other plans was updated in 2013 and 2014 so that the basis for assessment remained current. This also demonstrated that the sustainability issues are still relevant and that the methods of assessment remain applicable.

#### HOW HAS THE LOCAL PLAN BEEN ASSESSED?

21. An SA Framework was compiled and included SA Objectives that aim to resolve the issues and problems identified for development planning in the Local Plan area. This SA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in the following table:

Objective	Key Questions
1. To have a strong and stable economy	Will it help meet the employment needs of the local community? Will it help diversify the economy in general? Will it enhance the vitality and viability of the town centre? Will it encourage or enable inward investment? Will it promote investment in future prosperity (for example by supporting R&D, small businesses and/or encouraging skills development)?
2. To enable a range of sustainable transport options	Will it encourage the use of public transport, walking or cycling? Will it help reduce traffic congestion?
3. To reduce the need to travel	Will it reduce the overall need to travel? Will it help reduce the need to travel by car / lorry?
4. To reduce the generation of waste and increase recycling	Will it encourage the management of waste in line with the waste management hierarchy, giving first priority to reducing waste, followed by reuse and recycling, then other forms of energy recovery and lastly disposal? . Will any residual disposal be undertaken in the least environmentally detrimental manner?

Objective	Key Questions
5. To ensure the prudent use of land and natural resources	<p>Does it optimise the use of previously developed land and buildings?</p> <p>Will it minimise development on Greenfield land?</p> <p>Will it reduce the amount of derelict, degraded or underused land?</p> <p>Does it make efficient use of existing physical infrastructure (i.e. instead of requiring new infrastructure to be built)?</p> <p>Does it encourage resource-efficient design and/or construction (in terms of water and/or raw materials)?</p> <p>Does it encourage the use of materials from alternative and renewable sources?</p>
6. To protect and enhance the natural environment	<p>Will it protect and enhance species, habitats and sites designated for their nature conservation interest?</p> <p>Will it safeguard and/or enhance the character of significant landscape areas?</p>
7. To create and maintain safe, well-designed, high quality built environments	<p>Will it help provide a sense of identity and local distinctiveness?</p> <p>Will it protect or enhance the setting of the town?</p> <p>Will it promote design that enhances townscapes?</p> <p>Will it protect or improve safety in built environments?</p>
8. To protect and enhance the historic environment	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value?</p> <p>Will it encourage appropriate use of and/or access to buildings and landscapes of historical/cultural value?</p>
9. To create good quality air, water and soils	<p>Will it affect local air quality?</p> <p>Will it affect air quality in the Air Quality Management Areas?</p> <p>Will it minimise pollution of soils?</p> <p>Will it minimise light and noise pollution levels?</p> <p>Will it retain the best quality agricultural land?</p> <p>Will it minimise adverse effects on ground and surface water quality?</p>
10. To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources.	<p>Will it reduce overall energy use through increased energy efficiency?</p> <p>Will it reduce or minimise greenhouse gas emissions?</p> <p>Will it increase the proportion of energy generated from renewable and low carbon sources?</p>
11. To adapt to the predicted impacts of climate change including flood risk	<p>Will it reduce or minimise the risk of flooding?</p> <p>Will it minimise sensitive development in medium and high risk flood zones?</p>
12. To meet the housing needs of the whole community (ensuring the provision of decent and affordable housing for all, of the right quantity, type, size and tenure)	<p>Is it enabling the housing target to be met?</p> <p>Does it provide for the development of balanced communities by encouraging an appropriate mix of housing (in terms of type, size and tenure)?</p> <p>Will it reduce homelessness and housing need?</p> <p>Will it reduce the number of empty homes?</p>

Objective	Key Questions
13. To protect, enhance and improve accessibility to local services and community facilities	Will it maintain and enhance existing community facilities? Will it put unacceptable pressure on existing services and community facilities? Will it improve access to local services and facilities for the whole community?
14. To improve health and well being	Will it promote healthy lifestyles? Will it provide and improve access to health and social care services? Will it provide and/or enhance the provision of open space? Will it improve opportunities to participate in the district's cultural, sport and recreational opportunities?
15. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?
16. To reduce crime, fear of crime and antisocial behaviour	Will it reduce actual levels of crime? Will it reduce the fear of crime? Will it reduce / discourage anti-social behaviour?

22. Each emerging part of the Local Plan, including options for distributing housing, employment and infrastructure, potential allocations, and policies to control proposed development, was subject to SA. Using the SA Framework, the baseline information and professional opinion, the likely effects of the emerging Local Plan were assessed. The SA considered positive, negative and cumulative effects for alternatives according to categories of significance as set out in the following table:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
=	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

23. Sustainability Appraisal is informed by the best available information and data. However data gaps and uncertainties exist and it is not always possible to accurately predict effects at a strategic plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional/national level, and therefore a precautionary approach that seeks to

deliver best practice mitigation and adaptation is the most appropriate approach.

#### **WHAT REASONABLE ALTERNATIVES HAVE BEEN CONSIDERED AND ASSESSED?**

24. Throughout the development of the Local Plan, alternatives have been considered and appraised through the SA process in an iterative and ongoing way such that the findings of the SA have informed plan-making. Alternatives for the level and distribution of growth as well as potential site allocations have been considered from the early stages - from the SA Scoping Report (March 2011) through to the production of this SA Report (April 2014). The findings of the SA of alternatives and the reasons for the selection or rejection of options are provided in the main SA Report.

#### **WHAT ARE THE LIKELY SIGNIFICANT EFFECTS OF THE PUBLICATION DRAFT LOCAL PLAN?**

25. **Housing** (SA Objectives 7 & 12) Overall, the Local Plan is considered to have the potential for major short to long-term positive cumulative effects on housing through the provision of 12,860 new homes to meet the objectively assessed need of the District during the life of the Plan. Housing will be distributed across the District in urban and rural areas and Local Plan policies will ensure that a suitable mix of homes are provided to meet the needs of all people in the future. The increased supply of housing as a result of the policies and allocations could also have the effect of reducing house prices in the area, which was identified as a key sustainability at the scoping stage. The Local Plan also seeks to provide affordable housing that will also help to address this issue. Local Plan policies seek to protect the existing built environment and also require any new development to be well designed and be high quality.
26. **Economy and Employment** (SA Objective 1) Overall, the Local Plan is considered to have the potential for major short to long-term positive cumulative effects on the economy and employment through the provision of 66 ha of employment land during the life of the Plan. Major allocations for employment have been distributed between Leamington, Kenilworth and the sub-regional employment area in the north of the District. The Local Plan protects existing employment as well as supports economic growth through both the regeneration of previously developed land as well as development of suitable Greenfield sites. It also seeks to maintain the shopping function of the town centres and support proposals that enhance their roles.
27. **Communities and Health** (SA Objectives 13, 14, 15 & 16) The Local Plan seeks to protect and enhance accessibility to community facilities and services, which includes open space for recreation and health facilities. Provision is made for new community facilities and improvements to sustainable transport modes will help to improve accessibility. Policies support development that is of the highest quality and ensures that new development is integrated with existing communities and that the design and layout of proposals minimise the potential for crime and anti-social behaviour. The provision of housing and employment will help to meet the future needs of communities in the District

and the amenity of residents is also protected. It is therefore considered that the Local Plan as a whole will have major positive cumulative effects in the long-term for communities and health.

28. **Transport and Accessibility** (SA Objective 2 & 3) Local Plan policies seek to address the impacts of proposed development on the road network and ensure that appropriate infrastructure is provided. The IDP sets out a range of highways and sustainable transport infrastructure that will need to be delivered during the life of the Plan to support proposed development. Local Plan policies also seek to improve public transport and pedestrian routes and encourage the use of sustainable transport modes. These measures along with the delivery of housing, employment and community facilities/ services has the potential for a long-term positive cumulative effect on transport and accessibility.
29. **Air Quality** (SA Objective 9) It is considered that major negative effects on air quality are unlikely as a result of the Local Plan. Policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes as well as encourage the use of sustainable transport modes. While there may be some localised impacts in the short-term as a result of proposed development, the mitigation proposed through Local Plan policies and predicted trends in air quality will ensure that these are not significant.
30. **Climate Change and Flooding** (SA Objective 10 & 11) Local Plan policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes and encourage the use of sustainable transport modes. These measures along with predicted trends in air quality should ensure that the Local Plan does not have major long-term negative effects on climate change as a result of increased traffic. There is also the potential for the Local Plan to have negative cumulative effects through the embodied energy inherent in the construction and maintenance of development. Processing methods and technologies are likely to improve reducing the amount of embodied energy used; however this is uncertain.
31. **Water Resources and Water Quality** (SA Objectives 5 & 9) Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of 12,860 homes and 66 ha of employment land during the life of the Plan. Local Plan policies protect the water environment and encourage the inclusion of water efficiency measures and sustainable drainage systems as well as the provision of necessary infrastructure. Mitigation measures should ensure that negative cumulative effects are not significant.
32. **Natural Environment (Landscape, Flora and Fauna and Soils)** (SA Objective 5, 6 & 9) The level of growth proposed through the Local Plan has the potential for major long-term negative effects on the natural environment. To address this, the Local Plan seeks to direct development away from sensitive areas and also protect, enhance and restore the natural environment. The mitigation provided by Plan policies and available at the project level should address negative effects to ensure they are not significant for the landscape or biodiversity; however, the overall cumulative effect of the Local Plan remains

uncertain. The Local Plan will lead to the loss of large areas of best and most versatile agricultural land.

33. **Cultural Heritage** (SA Objective 8) Overall the Local Plan seeks to protect and enhance heritage as well as avoid development that would have an impact on the significance of heritage assets. It seeks to direct development to the available and suitable areas with the least constraint. Whilst it is recognised that development has the potential for negative effects on heritage it is also considered that there is the opportunity for positive effects by enhancing assets and promoting improved access. There is suitable mitigation available to address negative effects to ensure that they are not significant; however, the overall cumulative effect of the Local Plan on heritage remains uncertain.
34. **Waste and Recycling** (SA Objective 4) Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of 12,860 homes and 66 ha of employment land during the life of the Plan. Local Plan policies expect development proposals to make sufficient provision for sustainable waste management and they also allow for sufficient flexibility to address increased future demand for waste facilities as a result of proposed development.

#### **HOW COULD NEGATIVE EFFECTS BE MITIGATED AND POSITIVE EFFECTS ENHANCED?**

35. An important role of the SA process is to provide recommendations for the mitigation of negative effects and enhancement of the positive effects identified in the appraisal process. These can then be carried forward in the remainder of the plan-making process and can include further recommendations for other development plan documents and for processes including site master planning.
36. In preparing Local Plan policies, Warwick District Council has sought to mitigate the negative effects of development and maximise the opportunities presented. The proposed Policies and Site Allocations presented in the Publication Draft Local Plan reflect recommendations arising from all the previous SA work undertaken to support the plan development stages, and the Council is commended for their effective and thorough integration of key sustainability themes and requirements throughout the progression of the Plan. In particular, the findings of the SA guided the selection of potential site allocations by identifying sustainability issues and in particular the cumulative effects of development for settlements and sensitive receptors.
37. Potential negative effects are mitigated through strong policies that seek to protect, enhance and restore the natural environment and heritage as well as promote strong sustainable communities through high quality layout and design. The Local Plan ensures that necessary infrastructure and investment is provided at the right times and in the right places to support new development and communities. It also seeks to create a healthy integrated network of Green Infrastructure by planning for the natural environment at a variety of spatial scales, which will have benefits for communities and nature as well as the economy.

## **CONSULTATION**

38. The emerging Local Plan and its accompanying SA documents have been subject to statutory consultation at the scoping stage with the statutory bodies (English Heritage, Environment Agency, and Natural England) and wider consultation with stakeholders and the public. The SA accompanying each stage of plan-making since 2011 has been subject to public consultation through provision of the documents on the Councils' Local Plan website. Comments made and responses to these comments have been recorded and also made available. Thus consultation has been a vital ongoing and iterative element of the plan-making and the SA processes. The Publication Draft Local Plan and the SA Report reflect the findings of various technical studies and the responses received during consultation.

## **MONITORING PROPOSALS**

39. Local Planning Authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. Monitoring proposals were suggested in the early SA scoping stage and will be progressed, including consultation, as the Local Plan progresses. The Council will prepare a monitoring strategy that will include consideration of any specific requirements from the SA process.

## **SUMMARY AND NEXT STEPS**

40. The Sustainability Appraisal of the Publication Draft Local Plan has appraised the effects of the policies and site allocations as well as the overall effects of the plan, including cumulative effects. The Appraisal has identified that the proposed Local Plan will help to address the identified sustainability issues in the area, with major positive effects particularly for communities through the allocation of a range of new housing and employment land, together with improvements to sustainable modes of transport. The key negative effects identified relate to the potential environmental impact of increased housing, employment and infrastructure development. Overall, the policies and proposed site allocations provide a strong positive framework to guide future sustainable development in the District.
41. The consultation responses received on the Publication Draft Local Plan and this Sustainability Appraisal Report will be used to finalise the Publication Draft Local Plan. Any significant changes to the policies or strategic allocations proposed in the Plan will be subject to further appraisal as necessary and a revised SA Report will be published alongside the Submission Document.
42. The SA Report is available for review and comments alongside the Publication Draft Local Plan for a 6 week period commencing 12<sup>th</sup> May to 23<sup>rd</sup> June 2014. All responses should be sent to:

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43. Responses may also be made using the Warwick District Council Website by using the following link:  
[www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)