



**Warwick District Council
Local Plan:
Proposed Modifications

Sustainability Appraisal
Addendum Report**

June 2016

enfusion



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<i>date:</i>	<i>Consultation Version February 2016 Final version for Submission June 2016</i>	
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Warwick District Council Local Plan: Proposed Modifications SA Addendum Report

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1.0 Introduction

Background

- 1.1 Warwick District Council (WDC) has been undertaking Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) since 2011 to inform the preparation of the Warwick Local Plan. The SA and Local Plan progress to date may be summarised as follows:

Table 1.1: Local Plan and SA published documents to date

LDP Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
Issues and Scenarios Public consultation 17 March to 15 July 2011	SA Scoping Report Public consultation 17 March to 15 July 2011
Preferred Options Public consultation 01 June to 03 August 2012	Initial SA Report Public consultation 01 June to 03 August 2012
Revised Development Strategy Public consultation 14 June to 29 July 2013	Interim SA Report Public consultation 14 June to 29 July 2013
Village Housing Options and Settlement Boundaries Public Consultation 22 November 2013 to 20 January 2014	SA of Potential Village Site Allocations Public Consultation 22 November 2013 to 20 January 2014
Publication Draft Local Plan Public Consultation w/c 12 May to w/c 23 June 2014	Publication Draft SA Report Public Consultation w/c 12 May to w/c 23 June 2014
Submission Local Plan Submitted in Jan 2015 to be examined by an independent inspector	Submission SA Report Submitted alongside the Local Plan in Jan 2015 to be examined by an independent inspector
Proposed Modifications Public consultation from 11 March to 22 April 2016	SA Addendum Report (Feb 2016) Public consultation from 11 March to 22 April 2016
Proposed Modifications Submitted to Inspector June 2016	SA Addendum Report (June 2016) Submitted to Inspector June 2016

- 1.2 The Local Plan and all associated documents, including the SA Report, were submitted to the Secretary of State for Communities and Local Government on 30 January 2015 for independent examination. Initial hearing sessions were held from 6 to 12 May 2015 to consider the duty to co-operate (Matter 1), housing provision Matter 2) and the supply and delivery of housing land (Matter 3).
- 1.3 The Inspector's initial findings on Matters 1, 2 & 3 were received by WDC on 01 June 2015¹. He found that while the Council complied with the duty to co-operate, based on the evidence available the Local Plan was not sound in terms of the overall housing provision and the supply and delivery of housing

¹ EXAM 23 Inspector's letter to Council following initial hearings.

land. In response to this, the Council requested that the Inspector suspend the examination to allow additional work to address the issues identified, in particular the unmet housing need arising from Coventry². In light of the proposals put forward by the Council, the Inspector confirmed that the Examination process would be held in abeyance until the outcomes of the Shadow Economic Prosperity Board Meeting on 29 September 2015 were available³.

- 1.4 The Shadow Economic Prosperity Board considered a Memorandum of Understanding (MoU) relating to the scale and distribution of housing across the HMA. The MoU was supported by all the Councils in the Coventry and Warwickshire HMA with the exception of Nuneaton and Bedworth Borough Council. The Council sent a letter to the Inspector in October 2015 to inform him of the outcome of the meeting and formally request a suspension of the Examination⁴. The Inspector responded to the Council in late October 2015 confirming that the Examination has been suspended until May 2016⁵.
- 1.5 Following the suspension of the Examination the Council has undertaken a range of further work to address the Inspector's concerns, which includes work on site options in order to accommodate the potential uplift in housing requirement. This work has informed the development of proposed modifications to the Local Plan.
- 1.6 In October 2015, the Council commissioned Enfusion Ltd to provide specialist, independent services to undertake any further SA work required during the suspension of the Examination. The method and findings of the further SA work were presented in a SA Addendum Report (February 2016) that accompanied the Proposed Modifications on public consultation from 11 March to 22 April 2016. Any representations received have been taken into account with a response provided in Appendix V of this SA Addendum Report.

Purpose and Structure of this SA Addendum Report

- 1.7 The purpose of this SA Addendum Report is to clearly set out the method and findings of further SA work carried out during the suspension of the Local Plan Examination. This SA Addendum Report has been prepared in accordance with the requirements of the SEA Regulations⁶ and the NPPF⁷ and thus constitutes part of the Sustainability Report for compliance purposes.
- 1.8 Following this introductory Section 1, this report is structured into four further sections:
 - Section 2 explains the approach taken and details the methods used for further SA work;

² EXAM 25 WDC Letter to Inspector.

³ EXAM 25B Inspector's letter to the Council following request for suspension (EXAM 25)

⁴ EXAM 26 WDC Letter to Inspector 14th October 2015 with Appendices

⁵ EXAM 27 Inspector's letter to the Council 26 October 2015

⁶ http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf

⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- Section 3 provides a summary of the findings for further appraisal work in relation to options for the overall level, broad location and distribution of development growth as well as site options;
- Section 4 summarises the Proposed Modifications and updates the findings of the previous SA work for the Local Plan to reflect the uplift in development growth; and
- Section 5 sets out the overall summary findings and next steps for the Local Plan and the SA.
- Technical Appendices I-V provide details of the further sustainability appraisal work undertaken as well as responses to representations received.

2.0 SA Method

Introduction and Approach

- 2.1 Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The SA evaluates the likely significant effects of the plan, including reasonable alternatives, and taking into account the objectives and geographical scope of the plan. The role of SA is to inform the Council as the planning authority; the SA findings do not form the sole basis for decision-making - this is informed also by other studies, feasibility and feedback from consultation.
- 2.2 There is a tiering of appraisal/assessment processes (see also later Figure 3.1) that align with the hierarchy of plans - from international, national and through to local. This tiering is acknowledged by the NPPF (2012) in paragraph 167 that states that "*Assessments should be proportionate and should not repeat policy assessment that has already been undertaken.*" SEA sets the context for subsequent project level studies during Environmental Impact Assessment (EIA) for major development projects.
- 2.3 It should be noted that it is not always possible to accurately predict sustainability effects when considering plans at a strategic scale. Impacts on biodiversity and cultural heritage, for example, will depend on more detailed information and studies at a site-level. Whilst climate change science is becoming more accurate, it is difficult to predict impacts likely to result from climate change, including cumulative and synergistic effects.
- 2.4 The method and approach for the SA was previously reported in Section 2 of the Submission SA Report (SA10) submitted alongside the Local Plan to the Secretary of State for Examination in January 2015. This explained the scoping of the SA Framework of objectives and decision-aiding questions, how they developed and were amended to reflect updated evidence, and how they were used for the appraisal of the emerging plan at different stages.
- 2.5 In October 2015, the Council commissioned Enfusion Ltd to provide specialist, independent services to undertake any further SA work required during the suspension of the Examination. This section sets out the method and approach for the additional SA work that has been carried out during the suspension period of the Local Plan which seeks to respond to the Inspector's initial findings.
- 2.6 The SA Framework presented in Section 2 (Table 2.1) of the Submission SA Report (SA10), continued to form the basis for any SA work carried out during the suspension of the Examination. For continuity, the significance criteria presented in Table 2.4 of the Submission SA Report (SA10) were also used.

Fresh SA of Strategic Options

- 2.7 Following further work in relation to the objectively assessed housing need⁸ as well as further work in relation to the duty to co-operate⁹, it was considered necessary to reconsider the strategic options through the SA for the overall level and spatial distribution of growth. For further information on the history of the SA of alternatives and options assessment to date see Section 4 of the Submission SA Report (SA10).
- 2.8 The Council identified the potential for strategic options that needed reconsidering through SA as a result of the uplift in housing numbers as follows:
- four housing growth options
 - seven broad locational options
 - five distribution options
- 2.9 These strategic options were subject to independent SA by Enfusion against the SA Framework presented in Section 2, Table 2.1 of the Submission SA Report (SA10) and using the key presented in Table 2.4 of the same Report. A comparative appraisal of the alternatives was carried out using the baseline information (presented in Appendix II of the Submission SA Report (SA10) and any available updated evidence, together with professional judgment where appropriate.
- 2.10 The nature of the likely sustainability effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) were described in the appraisal commentary, together with any assumptions or uncertainties. The appraisal took into account the mitigation that is provided by various policies in the Local Plan Strategy and the symbols reflect this within the detailed appraisal matrix. Where relevant, the SA made suggestions and recommendations to mitigate negative effects or promote opportunities for enhancement. The findings of the appraisals are summarised in Section 3 of this SA Addendum Report with the detailed appraisal matrices presented in Appendix I.

SA of Site Options

- 2.11 The MoU relating to the scale and distribution of housing across the Housing Market Area, proposes the delivery of 932 dwellings per annum within Warwick District Council, a total of 18,640 new homes up to 2031 to help meet the full objectively assessed need of the HMA. This is an additional 218 dwellings per year on top of the 714 dwellings per year proposed in the Submission Local Plan. During the suspension of the Examination, WDC has undertaken further technical work in relation to sites in order to accommodate the potential uplift in housing requirement. This includes reviewing existing SHLAA sites as well as undertaking a call for sites for any

⁸ Updated Assessment of Housing Need: Coventry-Warwickshire HMA (September 2015)

⁹ Memorandum of Understanding relating to the planned distribution of housing within the Coventry & Warwickshire Housing Market Area (HMA) 29 September 2015

potential new sites. It also includes further technical and infrastructure assessments for potential site options.

- 2.12 As part of the iterative and on-going SA process, any new reasonable site options identified through the further technical work during the suspension of the Examination were subject to SA. Enfusion carried out an independent appraisal of the new site options against the full SA Framework presented in Section 2, Table 2.1 of the Submission SA Report (SA10) and using the key presented in Table 2.4 of the same Report. As per the previous SA work (please refer to Paras 2.12 - 2.16 of the Submission SA Report (SA10)) the findings for each of the new site options were set out in individual detailed matrices - evidence was cited where available or applicable, a commentary was provided and suggestions for mitigation or enhancement were made where relevant. The nature of the likely sustainability effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) were described, together with any uncertainty noted. The detailed matrices are presented in Appendix III of this Report.
- 2.13 A number of the previous site allocations have also been subject to amendment, in terms of boundary and/or capacity changes, following the further technical work carried out by the Council. These proposed modifications to site allocations were all subject to a screening process for significance with regard to SA and details are presented in Appendix II of this SA Addendum Report. As a result of this screening a number of the sites were subject to a refreshed site appraisal, and the findings of these are presented in Appendix III of this report. Some proposed amendments were determined to be insignificant with regard to SA and it was not considered necessary to refresh the sustainability appraisals for committed sites with existing planning permission.

SA of Proposed Modifications

- 2.14 As a result of the findings of the further technical work carried out during the suspension of the Examination, including the further SA work, the Council is proposing a number of modifications to the Submission Local Plan. These Proposed Modifications (PMs) reflect the agreed uplift in housing development and comprise amendments to Policies, new and changed (boundary, density) Site Allocations. The PMs were screened for their significance with regard to the SA process and in accordance with Government guidance¹⁰. The details are presented in Appendix II of this SA Addendum Report and they explain which PMs were considered to be likely to have significant effects and should be subject to refreshed and/or new assessment through SA. Certain PMs, such as minor boundary changes, were not considered to be likely to have significant effects and the findings of the Submission SA Report remain valid.

¹⁰ <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

- 2.15 The overall findings of the SA for the implementation of the Local Plan are set out in Section 5 of the Submission SA Report (SA10). The overall effects for implementation of the Local Plan with the Proposed Modifications to accommodate the uplift in housing development were subject to a refreshed SA. This was undertaken using the same method as described in the Submission SA Report – effects are reported according to the 10 key sustainability topics that been linked to relevant SA Objectives, SEA Directive topics, and the relevant requirements from the NPPF. Thus the SA considered the inter-relationships and potential cumulative effects from proposed modifications to sites and policies overall and how this would affect the SA findings reported in the Submission SA Report (SA10).

3.0 SA of Alternatives

Introduction

- 3.1 The development of plan-making options and the SA/SEAs of alternatives have been on-going throughout the production of the Local Plan and its accompanying SA. Following further work by the Council during the suspension of the Examination it was considered appropriate to undertake a fresh SA of reasonable alternatives
- 3.2 Section 4 of the Submission SA Report (SA10) sets out further details on the consideration of alternatives through SA as well as the history of the SA of alternatives and options assessment up to Submission in January 2015. This Section continues this narrative and sets out how options have been identified, assessed and progressed during the suspension of the Examination and have informed the Proposed Modifications. This section also sets out the reasons why alternatives have been progressed or rejected.

Options for the Level of Growth

- 3.3 The Submission Local Plan (Policies DS6 & DS7) proposed the delivery of 12,860 new homes in the District between 2011 and 2029. This requirement included a contribution to help meet the unmet needs of the wider HMA, in particular Coventry City. Following the initial hearing sessions in May 2015, the Inspector found that there was no evidence to suggest that the housing figure set out in the Submission Local Plan is the appropriate contribution to help meet the wider needs of the HMA. The Inspector's initial findings concluded that the Submission Local Plan was not sound as there was no clear strategy in place to meet the unmet needs of the HMA in full¹¹.
- 3.4 Following the Inspector's initial findings in June 2015 further work was carried out on housing needs by the LA's within the Coventry-Warwickshire HMA. The updated assessment of housing needs was published in September 2015 and identified that WDC has a need for 600 dwellings per annum or 12,000 new homes up to 2031.¹² It also stated that Coventry City is unlikely to meet its housing needs in full. The planned distribution of Coventry City's unmet housing need within the HMA was set out within a Memorandum of Understanding published in late Sept 2015.¹³ The MoU proposes the delivery of 932 dwellings per annum within WDC, a total of 18,640 new homes up to 2031 to help meet the full objectively assessed need of the HMA. This equates to a total of 17,577 new homes over the life of the Plan to 2029. This is an approximate increase of 196 dwellings per year to the 714 dwellings per annum that was previously proposed in the Submission Local Plan.

¹¹ EXAM 23 Inspector's letter to Council following initial hearings.

¹² Updated Assessment of Housing Need: Coventry-Warwickshire HMA (Sept 2015) Prepared by GL Hearn

¹³ Report to the Coventry, Warwickshire and South West Leicestershire Shadow Economic Prosperity Board (Tuesday 29th September 2015) Agenda Item 5, including Appendix 1.

3.5 In light of the updated evidence with regard to housing needs in the wider HMA, it was considered appropriate as part of the iterative and on-going SA process to carry out a fresh appraisal of reasonable options for the overall level of housing growth. Informed by the updated evidence WDC identified two new options for the overall level of housing growth alongside the two options proposed at an earlier stage of plan-making. The four growth options identified by the Council are as follows:

- **Option 1:** 600 new homes each year
- **Option 2:** 700 new homes each year
- **Option 3:** 900 new homes each year
- **Option 4:** 1,000 new homes each year

3.6 Enfusion undertook an appraisal of the four reasonable options above against the full SA Framework. The refreshed SA of growth options was informed by the updated evidence in relation to housing needs. The summary findings of the SA for the four options are presented below with the detailed appraisals provided in Appendix I.

Table 3.1: Summary Findings for Fresh SA of Growth Options

SA Objective	Options							
	1		2		3		4	
	600 new homes each year		700 new homes each year		900 new homes each year		1,000 new homes each year	
1. Economy	+ ?		+ ?		++ ?		++ ?	
2. Sustainable transport	+	?	+	-	++	-	++	-
3. Reduce need to travel	+ ?		+ ?		++ ?		++ ?	
4. Waste & Recycling	= ?		= ?		= ?		= ?	
5. Prudent use of land and natural resources	- ?		- ?		-- ?		-- ?	
6. Natural environment & landscape	-	?	-	?	--	-	--	-
7. Built environment	= ?		= ?		= ?		= ?	
8. Historic environment	- ?		- ?		-- ?		-- ?	
9. Air, water & soil quality	- ?		- ?		-- ?		-- ?	
10. Climate change mitigation	?		- ?		-		-	
11. Climate change adaptation - flood risk	= ?		= ?		= ?		= ?	
12. Housing needs	+		+		++		++	

	Options			
	1	2	3	4
SA Objective	600 new homes each year	700 new homes each year	900 new homes each year	1,000 new homes each year
13. Local services & community facilities	+ ?	+ ?	++ ?	++ ?
14. Health & well being	+ ?	+ ?	++ ?	++ ?
15. Poverty & social exclusion	+ ?	+ ?	++ ?	++ ?
16. Crime	= ?	= ?	= ?	= ?

- 3.7 The SA found that all of the options have the potential for long term positive effects against SA Objective 12 through meeting the objectively assessed housing needs of WDC alone. However, the significance of the positive effect increases along with the level of proposed growth. Evidence suggests that Option 1 will not help to meet any of Coventry City's unmet housing and will therefore not benefit the wider HMA. While Option 2 will help to meet some of the unmet need it will not be sufficient to help ensure that needs are met in full across the HMA. While Option 3 may not help to meet the unmet housing needs in full, falling just short of the 923 dwellings per annum set out in the MoU (Sept 2015), it more likely to benefit the wider HMA with the potential for major positive effects. Option 4 would meet the full distribution of housing growth for the HMA as set out in the MoU (Sept 2015) and has the potential for a positive effect of greater significance for the wider HMA compared to the other options.
- 3.8 The updated assessment for housing need for the Coventry and Warwickshire HMA also took into consideration the economic growth potential for the area.¹⁴ It found that Warwick District has a relatively growth-orientated economic base, with a concentration of employment in higher-value sectors and key strengths including in gaming. The updated assessment considered that the positive forecasts shown for the District in the 2015 Cambridge Econometrics forecasts seem realistic - these show growth in employment of 9,900 (on a policy-off basis) over the 2014-31 period, which equates to an annual growth rate of 0.8%. The assessment concludes that this would require the provision of 600 homes per year (as an annual average over the 2011-31 plan period).
- 3.9 Taking the above into account, the SA found that all of the Options would be able to support the predicted economic growth potential of the District with the potential for long term positive effects against this SA Objective. It is clear from the evidence that Coventry City will not be able to meet its housing

¹⁴ Updated Assessment of Housing Need: Coventry-Warwickshire HMA (Sept 2015) Prepared by GL Hearn

need in full. Options 3 & 4 would help to meet the needs of Coventry City and therefore help to support the economic growth potential for the wider HMA area. It is therefore assumed that they have the potential for a positive effect of greater significance when compared with Options 1 & 2. It also found that options 3 & 4 are likely to have enhanced positive effects against SA Objectives 2, 3, 13, 14 & 15 given the higher level of proposed growth and therefore greater provision of, or improvements to, sustainable transport modes as well as community facilities/services.

- 3.10 All of the options have the potential to encourage the re-use of previously developed land; however, as the level of proposed growth increases so does the likelihood that there will be a greater loss of Greenfield, Green Belt and agricultural land to accommodate development. Taking this into account the SA found that options 3 & 4 have the potential for permanent major negative effects against SA Objectives 6 and 9, as there is the potential for a greater loss of Greenfield, Green Belt and agricultural land in the District. While options 1 & 2 are also likely to have permanent negative effects, it is considered that these are likely to be of less significance compared to options 3 & 4. There is an element of uncertainty for all options until the distribution and precise location of development is known.
- 3.11 The appraisal found that the nature and significance of effects against SA Objectives relating to biodiversity (SA Objective 6), landscape (SA Objective 6) and heritage (SA Objective 8) are ultimately dependent on the distribution and precise location of development. Despite this, it was considered that as the level of growth increases so does the likelihood for negative effects against these SA Objectives. Compared to the other options, the appraisal found that options 3 & 4 have the greatest potential for residual major long term negative effects against landscape and heritage given the higher level of proposed development. It also found that there was greater potential for residual minor long term negative effects on biodiversity. While landscape and heritage are unlikely to be an absolute sustainability constraint for the higher levels of growth proposed through Options 3 & 4, it is likely that they will require more extensive mitigation measures to reduce the significance of cumulative negative effects.
- 3.12 Table 3.2 provides an outline of the reasons for selection/rejection of alternatives for the level of growth where relevant. It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the SA findings are not the sole basis for a decision; other factors, including planning and deliverability, play a key role in the decision-making process.

Table 3.2: Reasons for Progressing or Rejecting Options for the Level of Growth in Plan Making

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
Option 1: 600 new homes each year	Whilst this option would meet the objectively assessed housing needs for the district it would not contribute at all to meeting the needs of the wider housing market

	area.
Option 2: 700 new homes each year	This option would meet the OAN of the district and would contribute towards meeting some of the unmet needs of the wider housing market area. However, it does not accord with the agreed strategy for the redistribution of housing need from Coventry, which is unable to meet all of its needs within its area.
Option 3: 900 new homes each year	This option would meet the OAN of the district and would contribute towards meeting a significant proportion of the unmet needs of the wider housing market area. However, it does not accord with the agreed strategy for the redistribution of housing need from Coventry, which is unable to meet all of its needs within its area.
Option 4: 1,000 new homes each year	This option would meet the OAN of the district and would contribute towards meeting a substantial proportion of the unmet needs of the wider housing market area. It would accord with the agreed strategy for the redistribution of housing need from Coventry, which is unable to meet all of its needs within its area and has identified that that Warwick district should take 332 new homes each year from Coventry's unmet housing need. Compared to Option 3, this Option helps to meet the needs of the District as well as unmet need arising from Coventry; however, it has the potential for greater negative effects on the environment and the difference in terms of positive social and economic impacts are unlikely to be of significance.
Proposed Modification Combination of options 3 & 4 – 932 new homes per year	Preferred option that optimises socio-economic factors, minimises negative effects on environmental factors, and seeks to meet need as near as possible to the need arising.

Options for the Broad Location of Growth

3.13 In light of the updated assessment of housing needs and MoU between the Councils in the Coventry and Warwickshire HMA, it was considered appropriate to reconsider reasonable alternatives for the broad location of growth within the District. Informed by the updated evidence the Council identified two new options for the location of growth alongside the five options considered at earlier stages of plan-making. The seven growth options thus identified by the Council are as follows:

- **Option 1** - Focus development outside the Green Belt
- **Option 2** - Distribute around the urban fringe and across the District (including within and/or on the edge of some villages)
- **Option 3** - Disperse development in small/medium sites, including around the villages
- **Option 4** - New settlement outside the Green Belt

- **Option 5** - Protect the Green Belt from development, where non-Green Belt sites are suitable and available) and concentrate growth within and on the edge of existing urban areas as well as distribute growth across the District.
- **Option 6** - New settlement inside the Green Belt
- **Option 7** - Focused around key transport corridors

3.14 As part of the iterative and ongoing SA process, Enfusion undertook an appraisal of the seven reasonable options above against the full SA Framework. The fresh SA of growth options was informed by updated evidence where relevant. The summary findings of the SA for the seven options are presented below with the detailed appraisals provided in Appendix I.

Table 3.3: Summary Findings for Fresh SA of Options for the Location of Growth

SA Objective	Options							
	1	2	3	4	5	6	7	
	Focus dev outside the Green Belt	Distribute around the urban fringe and across the District	Disperse dev in small/medium sites, including the villages	New settlement outside the Green Belt	Protect BG, focus within and on edge of urban areas and distribute growth across District	New settlement inside the Green Belt	Focused around key transport corridors	
1. Economy	+ -	+ -	+ -	+ -	+ -	+ -	+ -	
2. Sustainable transport	+ - + ?	+ - + ?	+ - + ?	+ - + ?	+ - + ?	+ - + ?	+ - + ?	
3. Reduce need to travel	+ - ++	+ - ++	+ - ++	+ - ++	+ - ++	+ - ++	+ - ++	
4. Waste & Recycling	+ ?	+ ?	= ?	+ ?	+ ?	+ ?	+ ?	
5. Prudent use of land and natural resources	-	-- ?	-- ?	-	- ?	--	-- ?	
6. Natural environment & landscape	- ? - ?	- ? - ?	- ? - ?	- ? - ?	- ? - ?	- ? - ?	- ? - ?	
7. Built environment	?	?	?	?	?	?	?	
8. Historic environment	-- ?	- ?	- ?	-- ?	-- ?	- ?	- ?	
9. Air, water & soil quality	--	- ?	- ?	-	- ?	- ?	- ?	
10. Climate change mitigation	+ -	+ ?	+ -	+ -	+ ?	+ -	+ -	
11. Climate change adaptation - flood risk	?	?	?	?	?	?	?	
12. Housing needs	+ -	++	+ -	+ -	++	+ -	+ -	

SA Objective	Options							
	1	2	3	4	5	6	7	
	Focus dev outside the Green Belt	Distribute around the urban fringe and across the District	Disperse dev in small/medium sites, including the villages	New settlement outside the Green Belt	Protect BG, focus within and on edge of urban areas and distribute growth across District	New settlement inside the Green Belt	Focused around key transport corridors	
13. Local services & community facilities	+ -	+ -	+ -	+ -	+ -	+ -	+ -	
14. Health & well being	+ -	+ -	+ -	+ -	+ -	+ -	+ -	
15. Poverty & social exclusion	+ -	+ -	+ -	+ -	+ -	+ -	+ -	
16. Crime	?	?	?	?	?	?	?	

3.15 The SA found that options 1, 3, 4, 6 & 7 have the potential for long term positive effects on the SA objectives relating to housing, the economy, community services/facilities, health and poverty and social exclusion. However, it was considered that the positive effects are only likely to be minor as these options would only help to meet the needs of particular communities within the District. Given this, the appraisals found that there is also the potential for minor long term negative effects against those SA Objectives as the options will not help to meet the needs of all residents. Options 2 & 5 were considered more likely to meet the needs of all residents as development will be focussed towards urban areas, where need is the greatest, and also be distributed across the District helping to meet the needs of rural communities. The appraisal found that options 2 & 5 were less likely to result in any negative effects against those SA Objectives and also have the potential for an enhanced positive effect against SA Objective 12.

3.16 Options 2 & 5 are considered more likely to have positive effects of significance against SA Objectives 2 and 3 as distributing development around the urban fringe as well as wider the wider District has the potential to support improved public transport services over a wider area. It will also help to reduce the impacts on traffic as development will be more evenly distributed across the District. The provision of housing and employment as well as associated services/facilities across the District also has the potential for significant medium to long term positive effects by reducing the need to travel for residents.

3.17 Options 1, 4 & 5 focus development outside the Green Belt so were considered likely to result in minor negative effects against SA Objective 6 through the loss of greenfield land compared to the remaining options which propose development within the Green Belt land have the potential for major negative effects. Evidence suggests that there are large areas of best and

most versatile agricultural land to the south of Warwick and Leamington Spa¹⁵. Options that focus development outside of the Green Belt in the south of the District therefore have the greatest potential for negative effects of significance against SA Objective 9 through the potential loss of best and most versatile agricultural land. However, there is also an element of uncertainty as the significance of the effect is dependent on the precise location of development and there are data gaps in relation to agricultural land quality.

- 3.18 Those options focussing development outside the Green Belt, in the south of the District, also have greater potential for negative effects of significance on the landscape and historic environment. Warwick Castle and its historic park and garden are Grade I listed and are situated to the south of Warwick along with a number of listed buildings and Scheduled Monuments. The Landscape Character Assessment (LCA) for Land South of Warwick and Leamington notes that Warwick and Leamington Spa have highly-valued historic cores and Warwick Castle and the associated Castle Park have national heritage significance. The LCA states that “protecting the setting of these features must be considered a principal goal of future development planning in the locality”¹⁶. There is also some uncertainty as the precise location of development is not known at this stage.
- 3.19 Table 3.4 provides an outline of the reasons for selection/rejection of alternatives for the location of growth where relevant. It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the SA findings are not the sole basis for a decision; other factors, including planning and deliverability, play a key role in the decision-making process.

Table 3.4: Reasons for Progressing or Rejecting Options for the Location of Growth in Plan Making

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
Option 1 - Focus development outside the Green Belt	This would lead to a concentration of development in one part of this District and would offer little scope to meet the needs of Kenilworth, growth villages or areas immediately adjacent to the Coventry urban area. Furthermore, it is unlikely that there is sufficient capacity in this area to meet the housing requirement within the plan period.
Option 2 - Distribute around the urban fringe and across the District (including within and/or on the edge of some villages)	This option was initially pursued in 2012 as the Preferred Option, however it became evident that further sustainable development opportunities outside of the green belt were deliverable and therefore should be allocated in the first instance.
Option 3 - Disperse development	This would lead to significant negative

¹⁵ Magic Map (2015) Post 1988 Agricultural Land Classification.

¹⁶ Warwick District Council (Feb 2009) Landscape Character Assessment for Land South of Warwick and Leamington

in small/medium sites, including around the villages	sustainable affects in terms of access to services, transport and infrastructure as well disproportionate impacts on villages with little in the way of services.
Option 4 - New settlement outside the Green Belt	Development would be focused in one area, similar to option 1, with little scope to address needs elsewhere within the District.
Option 5 - Protect the Green Belt from development, where non-Green Belt sites are suitable and available) and concentrate growth within and on the edge of existing urban areas as well as distribute growth across the District.	This option is the preferred option to progress through both the submission local plan and proposed modifications. It complies with the local plan spatial strategy and offers the most sustainable approach to the delivery of housing by meeting housing needs predominantly from where they arise in and adjacent to urban areas and growth villages which have a reasonable level of services. The proposed modifications includes further growth within all of these areas, and because of the level of availability of suitable sites outside of the Green Belt, significant further development in the existing Green Belt in sustainable locations.
Option 6 - New settlement inside the Green Belt	Development would be focused in one area, not necessarily where the need is derived from. It would have significant environmental impacts and unlikely to deliver the homes required within the plan period in its entirety.
Option 7 - Focused around key transport corridors	This options was considered as an alternative during the assessment for the proposed modifications. However, it was considered that it may not accord with National planning policy on Green Belt; may increase unsustainable means of travel (as road corridors are included) and not meet housing needs in the most suitable areas in environmental terms.

Options for the Distribution of Growth

- 3.20 The potential for reconsidering strategic options for the distribution of the uplift in growth is limited by the number of reasonable site options available at the Settlements. Each potential amended or new site option was subject to new or refreshed SA - as described below, in the following section 4 and detailed in Appendix III. The Council made a new call for potential site options and reconsidered the previous site options that had not been progressed in order to identify potential sites that would still be in conformity with the Local Plan Strategy. From the site options identified, the Council considered the scope for revisiting strategic options for distributing the available potentially suitable sites as follows:

Option 1 – more in Kenilworth & Coventry (Green Belt), slightly less in Leamington/Warwick (Green Belt) & rural area
Urban Brownfield 1208; Greenfield on edge Kenilworth 1660; Greenfield on edge Warwick/Leamington/Whitnash 3020; Greenfield on edge Coventry 3025; Growth Villages & rural 763 – Total new homes 9,676

Option 2 – less in Kenilworth & Growth Villages, more Green Belt growth in North Leamington

Urban Brownfield 1208; Greenfield on edge Kenilworth 760; Greenfield on edge Warwick/Leamington/Whitnash 4335; Greenfield on edge Coventry 2245; Growth Villages & rural 763 – Total new homes 9,311

Option 3 – Less on edge of Leamington & Warwick, further growth to south of Coventry

Urban Brownfield 1208; Greenfield on edge Kenilworth 1500; Greenfield on edge Warwick/Leamington/Whitnash 2455; Greenfield on edge Coventry 3025; Growth Villages & rural 1146 – Total new homes 9,334

Option 4 – Significantly less at Coventry, further growth in Kenilworth/Leamington/Warwick and rural areas

Urban Brownfield 1208; Greenfield on edge Kenilworth 1660; Greenfield on edge Warwick/Leamington/Whitnash 4335; Greenfield on edge Coventry 445; Growth Villages & rural 1446 – Total new homes 9,094

Option 5 – on edge of urban areas, Proposed Modification **Policy DS10**

Urban Brownfield 1208; Greenfield on edge Kenilworth 1500; Greenfield on edge Warwick/Leamington/Whitnash 3270; Greenfield on edge Coventry 2455; Growth Villages & rural 1146 – Total new homes 9,369

- 3.21 Compared to the Submission Local Plan (1535 + 1500 + 3270 + 0 + 744 = total new homes 9,369), these 5 strategic options consider distributing the additional housing requirement variously through more growth to the South of Coventry, around Kenilworth/ Warwick/ Leamington/Whitnash and the Villages/rural areas. Options 1 and 3 are not realistic as they would require significant new highway infrastructure that is unlikely to be deliverable within the Plan period. Accordingly, Options 1 & 3 were not considered to be reasonable with regard to the requirements of the SEA Regulations and they were not subject to SA.
- 3.22 A comparative strategic level assessment was undertaken using the SA Framework, professional judgment and focusing on the key factors for strategic and cumulative effects for the uplift in housing (as each new or amended site option had been subject to SA). Option 2 with more sites on the edge of North Leamington is likely to have the potential for major negative effects on landscape and loss of Greenfield/ Green Belt, compared to Options 4 and 5.
- 3.23 Option 4 with significantly less growth at edge of Coventry and more in Villages/rural areas is likely to have cumulative negative effects on the Villages/rural areas with regard to SA Objectives for transport/accessibility and associated poor air quality due to limited sustainable transport, loss of green space/Green Belt, and for local biodiversity, heritage and landscape.
- 3.24 Option 5 proposes Urban Extensions at the edge of Coventry. Whilst this has cumulative, and potentially major, negative effects on landscape/visual amenity and openness through loss of Green Belt, provision of Urban

Extensions (with a scale of over 500 dwellings) offers more opportunities for mitigation and enhancement through strong masterplanning and sustainable design. This can indicate stronger positive effects for other SA objectives such as community & recreational facilities and health/well-being, sustainable resources (energy, waste, local food growing), sustainable transport, and local biodiversity/green infrastructure. The specific requirements proposed in the new Urban Extension Policies should mitigate for negative effects, although there will be cumulative negative effects remaining associated with the loss of Green Belt and open landscape.

- 3.25 The details of effects identified through the SA of the new and amended site options that contribute to Option 5 are provided in Appendix III. Summaries of strategic comparative SA findings and the reasons for progressing or rejecting the strategic options for distributing the available sites are set out in the following Table 3.5:

Table 3.5: Summary of SA Findings & Reasons for Progressing or Rejecting Strategic Options for the Distribution of Growth in Plan Making

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
Option 1 – More in Kenilworth & Coventry	Not a reasonable alternative as not deliverable in the Plan period due to highways infrastructure requirements. Not subject to SA and not progressed.
Option 2 - Less in Kenilworth, more in N Leamington	May not meet Kenilworth's needs as a town & loss of significant Green Belt, potential major cumulative negative effects on landscape - thus not progressed further.
Option 3 – Less in Leamington & Warwick, more to S Coventry	Not a reasonable alternative as not deliverable in the Plan period due to highways infrastructure requirements. Not subject to SA and not progressed.
Option 4 – Less in Coventry, more in other areas	Does not necessarily meet with needs of Coventry & limited possibilities for sustainable development as only one urban extension; negative effects on landscape and transport for the Growth Villages/rural exacerbated and option not progressed further
Option 5 – Significantly more in S Coventry, more in Kenilworth & Villages/ rural	Maximises possibilities for sustainable development (housing, transport/accessibility, green infrastructure, community facilities & services), through urban extensions at edge of Coventry. Minimises potential negative effects on sustainable transport & environmental factors, especially landscape & local biodiversity, of the other towns, villages and rural areas. Potential remains for long term negative effects on landscape.

Options for Sites: Strategic and Villages/Rural

- 3.26 The Council has considered a range of different site options throughout the development of the Local Plan and its accompanying SA. Section 4 of the Submission SA Report (SA10) sets out the history of how site options have been considered through plan-making and the SA up to Submission in January 2015. The chronology of identifying, assessing and refining options for site allocations up to Submission was detailed in Appendix VII of the Submission SA Report (SA10). During the suspension of the Examination the Council has undertaken further work in relation to sites in order to accommodate the proposed uplift in housing requirement (see earlier in this Section). This includes reviewing existing SHLAA sites as well as undertaking a call for sites for any potential new sites. It also includes further technical and infrastructure assessments for potential site options.
- 3.27 As part of the iterative and ongoing SA process for the Local Plan, any new reasonable strategic site options identified through the further work carried out by the Council were subject to an independent appraisal by Enfusion. These were primarily associated with sites on the edge of Coventry and Kenilworth. Any proposed changes to the boundary and/or capacity of the sites as a result of the further technical work carried out by the Council were screened to assess whether the amendments would lead to any significant effects and thus change the findings of the previous sustainability appraisals. The findings of the SA screening process are presented in Appendix II; amended and/or new strategic site options were subject to a refreshed SA and the findings are detailed in Appendix III.
- 3.28 The Proposed Modifications set out a number of changes to the village sites allocated under Policy DS11 and these were screened for their significance with regard to SA. The majority of the proposed changes do not significantly affect the findings of the previous SA work for village/rural site options – as presented in Section 4 and Appendix VI of the Submission SA Report (SA10). The Council has considered four new site options for the growth of villages in Baginton, Barford, Cubbington and Hatton Park that have previously not been considered through the SA process and each was subject to full SA with details of findings presented in Appendix III of this SA Addendum Report. The sustainability appraisal of the new sites identified potential major negative effects as a result of the loss of Green Belt and best and most versatile agricultural land, however this is consistent with previous findings and the findings of the SA for the overall cumulative effects for the villages were not significantly affected.
- 3.29 There were a number of other new site options considered through plan-making but not progressed further as allocations in the Proposed Modifications to the Local Plan. These were options that had not been previously subject to SA in 2015. Therefore, they were tested through SA and the findings are also presented in Appendix III of this SA Addendum Report. The reasons for not progressing these new site options are provided in Appendix IV of this SA Addendum Report that sets out a chronology of site options.

4.0 SA of the Local Plan Proposed Modifications

Introduction

- 4.1 Following Examination hearings in May 2015 and the publication of the Inspector's initial Findings in June 2015, the Council has carried out further work during the suspension of the Examination to try and address the concerns raised by the Inspector - the Objectively Assessed Housing Need and Duty to Cooperate. The further work, including further SA work in relation to alternatives, has informed the development of the Proposed Modifications to the Submission Local Plan.
- 4.2 The main changes include an uplift in the housing requirement from 12,860 to 16,776 new dwellings (DSNEW1) over the life of the Plan. This reflects the agreements in the Memorandum of Understanding in which Warwick District will contribute to meeting the housing needs of Coventry. This has implications for the number of development sites coming forward in the plan and the distribution of growth across the District, which now includes an area of growth around the southern urban fringe of Coventry, and the amount of land ultimately being removed from the Green Belt. Further amendments include:
- new site specific policies
 - a new policy to deliver self-build opportunities within larger development sites
 - more flexibility in delivering Gypsy and Traveller accommodation
 - increased protection for best and most versatile agricultural land
- 4.3 The predicted effects and SA findings of the individual sites and new site specific policies are detailed in Appendix III. The potential effects of the Proposed Modifications with regard to the overall implementation of the Plan against each of the SA Topics (as set out in the Submission SA Report) are summarised in Table 4.1 below.

SA of the Local Plan Proposed Modifications

Table 4.1: Summary of the Likely Effects of the Local Plan Modifications on SA Topics

SA Topic	Relevant SA Objective(s)	Likely effects of proposed modifications (2016) (positive/negative, duration, permanent/temporary, secondary, cumulative and synergistic) on the SA Findings (2015)
Housing	7, 12	<p>The uplift in housing numbers has the potential to increase the significance of the previously identified positive effects against the topic of housing by contributing to meeting the housing needs of the wider HMA.</p> <p>New policy HNEW1 ensures the delivery of custom and self-build housing opportunities, which can increase the significance of the previously identified positive</p>

		<p>effects against this topic by increasing the potential type and mix of housing, and allowing for specialised housing to meet specific needs (e.g. the needs of the elderly or disabled).</p> <p>The amendments to Policy H7 provide greater flexibility in meeting the accommodation needs of Gypsies and Travellers which has the potential to increase the significance of the previously identified positive effects against the topic of housing.</p>
Economy & Employment	1	<p>The previous SA identified the potential for minor indirect positive effects on the economy as a result of housing growth. The uplift in housing is therefore likely to increase the significance of these indirect positive effects by supporting the economic growth potential for the wider HMA area.</p>
Communities & Health	13, 14, 15, 16	<p>As identified above against the topic of housing, new policy HNEW1 ensures the delivery of custom and self-build housing opportunities, which can increase the significance of the previously identified positive effects against the topic of communities and health by increasing the potential type and mix of housing, and allowing for specialised housing to meet specific needs (e.g. the needs of the elderly or disabled).</p> <p>The amendments to Policy H7 provide greater flexibility in meeting the accommodation needs of Gypsies and Travellers which also has the potential to increase the significance of the previously identified positive effects against the topic of communities and health.</p> <p>The new policy DSNEW5 provides land for the development of new outdoor sports facilities at Castle Farm and Warwick Road, which can contribute to promoting healthy and active lifestyles with the potential for minor long-term positive effects on health for the surrounding communities.</p>
Transport & Accessibility	2, 3	<p>The uplift in housing has the potential to increase the significance of negative effects identified against the topic of transport and accessibility. The previous appraisal identified the conclusions from the strategic transport assessment that there is the potential for residual impacts on the highways network as a result of the predicted growth. The Warwick and Leamington Transport Strategy brings together the</p>

		<p>findings from this assessment and further work carried out by Atkins¹⁷ to develop an alternative approach to transport in response to existing transport issues and growth proposals. The evidence identifies a range of mitigation strategies to be delivered along key travel corridors in Warwick, Leamington Spa and in Kenilworth, which will contribute to reducing the extent of negative effects. The mitigation along key transport corridors is also expected to reduce the potential effects of development south of Coventry, and given that this is an urban extension area, it is considered that development here can provide significant transport improvements in and around these sites. The majority of development in Kenilworth is located along the A46 and it will be important to monitor the cumulative effects of increased growth at Kenilworth on transport and accessibility to ensure that development does not lead to any significant negative effects.</p> <p>The uplift in housing growth also has the potential to increase the significance of positive effects identified against the topic of transport and accessibility by supporting improved public transport services over a wider area, and through the delivery of new supporting infrastructure, services and facilities.</p>
Air Quality	9	<p>In light of the transport issues identified above, it is also considered likely that the uplift in housing growth has the potential to increase the significance of negative effects identified against the topic of air quality. The mitigation measures proposed along the key transport corridors and within Kenilworth as identified above should contribute to reducing the extent of these negative effects.</p>
Climate Change & Flooding	10, 11	<p>The uplift in housing has the potential to increase the significance of negative effects on climate change as increased provisions could result in increased levels of traffic and therefore greenhouse gas emissions. However, given the findings of the SA for the transport and accessibility and air quality topics above, it is considered that mitigation is in place to address these negative effects.</p> <p>The policy mitigation in place for identified areas of flood risk, as well as the increase in impermeable surfaces as a result of development (including the proposed uplift in development) is considered</p>

¹⁷ http://www.warwickdc.gov.uk/downloads/download/655/transport_assessments Warwick and Leamington Transport Strategy

		sufficient to ensure that there will be no additional significant negative effects against the topic of flooding.
Water Resources & Water Quality	5, 9	The uplift in housing may increase the significance of potential negative effects identified against this topic through increased abstraction and waste water discharge, particularly considering the current and predicted supply-demand deficit. Although the mitigation provided through the Local Plan and regulatory processes is considered sufficient to ensure that there will be no major negative effects, and it is assumed that the uplift can be planned and phased in a timely manner to ensure the appropriate capacity and management processes are in place, the previous SA recommendation that Policy FW3 should be amended to encourage all new residential development of one dwelling or more to meet a standard of 90 litres/person/day in terms of water efficiency remains valid, with an increased significance considering the uplift in housing.
Natural Environment (Landscape, Flora and Fauna, and Soils)	5, 6, 9	<p>The uplift in housing growth will ultimately lead to an increase in the loss of both greenfield and Green Belt land in the District, which will increase the significance of negative effects identified against the topic of the natural environment, as well as the extent, as new areas around the south of Coventry, Kenilworth and North of Leamington are now allocated within the plan. The modifications to the local plan recognise that as a result of the increased number of site allocations within the plan, the availability of best and most versatile agricultural land is decreasing, and the policy modifications seek to minimise the loss of this limited resource wherever possible recognising its increasing importance and vulnerability.</p> <p>Though an increase in housing growth has the potential to increase the fragmentation of habitats in and around urban fringe areas, it is considered that appropriate mitigation is still provided through the Local Plan to ensure that these effects will not be significant. The uplift in development also has the potential to deliver increased habitat improvement measures in and around new development areas, and further support improvements to habitat connectivity as a result of appropriate contributions.</p>
Cultural Heritage	8	The uplift in housing growth has the potential to increase the significance of the effects identified against the topic of cultural heritage and the extent,

		<p>given that sites are now allocated south of Coventry. More housing development will ultimately change the landscape to a greater degree which has the potential to both positively and negatively affect heritage settings.</p> <p>It is still considered that appropriate mitigation is provided through the Local Plan and available at the project level to ensure that there will be no significant negative effects against the topic of Cultural Heritage.</p> <p>It is also recognised that the requirement for high-quality and sustainable design has the potential for positive effects on townscape / urban fringe settings and accessibility, and as a result of the uplift, there is the potential for these positive effects to reach wider areas across the District, particularly south of Coventry.</p>
<p>Waste & Recycling</p>	<p>4</p>	<p>Ultimately the uplift in housing growth has the potential to increase waste generated within the District, however it is assumed that the uplift can be planned and phased in a timely manner to ensure the appropriate capacity and management processes are in place. Local plan policies are still considered sufficient to ensure that there will be no significant negative effects arising against the topic of waste and recycling.</p>

5.0 Summary and Next Steps

- 5.1 As part of the iterative and ongoing SA process a range of further SA work has been carried out during the suspension of the Examination. This includes a fresh appraisal of strategic options for the level, broad location and distribution of growth as well as further appraisal work in relation to site options. This SA work has informed the Council's decision-making and the development of Proposed Modifications for the Local Plan.
- 5.2 The findings of the SA with regard to the implementation of the Local Plan as a whole have been updated to incorporate the SA findings of the Proposed Modifications, including new policies and site allocations. The updated appraisal found the uplift in housing requirement has the potential to increase the significance of positive effects for housing, by addressing a known housing issue within the wider HMA. However the uplift is also likely to increase the significance of negative effects, particularly in relation to traffic, transport and accessibility, and landscape, heritage and local biodiversity – cumulatively and in the longer-term.
- 5.3 The increased uplift of housing provided by the Urban Extensions on the edge of Coventry offers additional possibilities through the scale of development for sustainable design and building, including efficiencies in resource management (waste & energy), sustainable transport with provision and/or linkages to sustainable transport modes and green infrastructure, and provision of community facilities; the specific requirements in the new Policies will help mitigate negative effects and promote positive effects. However, the cumulative negative effects on landscape and loss of Greenfield remain.
- 5.4 New and amended policies now allow for custom build houses which can support specialist community needs and have created more flexibility around the delivery of accommodation to meet the needs of Gypsy and Travellers, with the potential to increase the significance of positive effects for communities and health.
- 5.5 The method and findings of the further SA work were presented in a SA Addendum Report (Feb 2016) that accompanied the Proposed Modifications (Part 1) on public consultation from 11 March to 22 April 2016. Any representations received were taken into account and informed the preparation of this SA Addendum Report. Any further significant changes to the Local Plan that arise as a result of further hearing sessions will also need to be considered through the iterative SA process.