

Warwick District Council

Local Plan Examination

Response to Inspector's Matters and Issues

Matter 13 – Other Policies

Sustainable Communities

Policy SC0 – Sustainable Communities

Issue

Whether other policies are justified, effective and consistent with national policy.

October 2016

Policy SC0 Sustainable Communities

1. What is the basis for the policy? What is it seeking to achieve?

- a) The Submission Local Plan has been prepared to reflect the need for both strategic and overarching guidance that sets a sustainable context for development and also includes policies designed to help deliver consistent development management decision-making. To achieve this, each section of the plan (following the strategic allocations and proposals set out in the Development Strategy section) begins with an overarching policy that aligns with development strategy and provides an over-arching context for the detailed chapter policies. This enables the council to focus on detailed aspects of delivery within a broad strategic context in a logical and thorough manner.
- b) The plan has been structured to reflect alignment with the Sustainable Communities Strategy (SCS) (O01). The sustainable communities section in the Local Plan specifically aligns the aims of supporting sustainable communities, promoting health and wellbeing and enabling community safety, which are themes highlighted in the SCS
- c) In the case of SC0, this policy identifies those characteristics of new development that need to be addressed to achieve sustainable outcomes, including layout and design, landscaping, environmental protection, regeneration and the provision of both physical and social infrastructure. This will be achieved through the subsequent development policies that relate to this overarching one and which amplify and focus on the main objectives set out in this policy.
- d) The policy itself supports the delivery of strong and sustainable communities and seeks to protect and enhance the historic, built and natural environment of the district. It acts as a bridge between the strategic policy DS3 and the subsequent development management policies.

2. How does the policy relate to the evidence base?

- a) The policy identifies a number of overarching objectives that cover various topics that of themselves inform aspects of the evidence base.
- b) The Submission Draft Sustainability Appraisal Report (SA10) did not look at all policies in the plan as it was felt that not all policies would be relevant to a particular topic or were considered unlikely to have a significant effect. It looked at ten key topics linked to Sustainability Appraisal Objectives as well as SEA Directive topics and relevant paragraphs from the NPPF (SA10, Chapter 5).
- c) There is a high degree of synergy between the key topics assessed in the SA and the overarching objectives set out in SC0. Paragraph 5.11 of SA10 considers the overarching policy in more detail, and identifies it as having a positive effect on Objective 7 of the SA (to

create and maintain safe, well-designed, high quality built environments).

- d) In tandem with policy BE1 (Layout and Design), SC0 seeks to promote good quality development, which is recognised in the SA:

... These policies will ensure that new development is well-designed and good quality and will minimise potential impacts on the existing built environment.

- e) The draft Local Plan has been prepared in light of the Warwick District and Warwickshire County Sustainable Community Strategies; one of the main points of focus for the strategies is the creation of sustainable communities and this is addressed in paragraph 1.11 of SA10:

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, including tackling inequalities, and the protection of the natural and built environment.

- f) The policy draws on a wide range of evidence which have contributed the Council's approach to supporting and delivering sustainable communities including:

- i. Landscape evidence (V16, V17, LA01, LA02, LA03, LA04)
- ii. Historic Environment evidence (HE01, HE05, HE06, HE03PM, HE04PM)
- iii. Built Environment evidence (BE01)
- iv. Green Infrastructure evidence (G01, G02, G03)
- v. Inclusive, Safe and Healthy Communities evidence (I01, I02)
- vi. Climate Change evidence (CC01, CC02, CC03)
- vii. Ecological evidence (B01, B02, B03, B04, B06PM)
- viii. Infrastructure evidence (various – see IDP IN07PM)

3. Is the policy sufficiently clear? Will it provide sufficient guidance for decision making?

- a) The policy is intended to promote the delivery of balanced and coherent communities. It provides a high level context for the policies that follow in the rest of the Sustainable Communities section and as such helps ensure all parts of that section are linked and work in synergy. It is clear in its aspirations to achieve good design and sufficient infrastructure to sustain community growth and to promote healthy lifestyles and behaviours.
- b) Planning proposals and new development will therefore be required to take account of the requirements of this policy to achieve an appropriate balance between different material considerations as set out in the more detailed policies. In this way the policy seeks to deliver appropriate levels of development of the right sort and in the right place.
- c) The policy shows how the range of the policies within the sustainable communities section of the Local Plan tie together and need to be understood as a whole. It therefore helps applicants and decision takers to put the more specific policies that follow in a holistic

context.

4. How will the policy be implemented? Is this clear?

- a) The policy will be implemented through its role as an overarching framework as described above and also through the policies that fall out from it, including the built environment, transport and infrastructure, heritage and environment and active lifestyle policies.

5. How does the policy relate to national policy? How is it consistent? Are there any inconsistencies?

- a) National policy requires local plans to reflect the need to deliver sustainable development and this is intended to be a golden thread running through all the policies of the plan. The policy echoes the broad requirements of national guidance in its clear commitment to pursuing sustainable development, in the form of high design and environment quality, protecting the built, historic and natural environments, promoting regeneration and protecting ecological assets. The policy links to the SCS and seeks to provide the framework to ensure that decisions are taken in line with the aspects of sustainable development that relate to communities – the built and natural environment, transport, healthy lifestyles, and community safety.
- b) The policy is consistent with national requirements to support sustainable development. Paragraph 154 of the NPPF requires policies to provide a clear indication of how a decision maker should react to a development proposal. Policy SC0 does this by making it clear how sustainable development proposals can be achieved and what they should address to enable the Council to support them.

6. In overall terms is the policy justified, effective and consistent with national policy?

- a) The Council contends that the policy is consistent with national policy as set out above. It is justified by a wide evidence base (see above) and will be effective in that it supports the policies that follow in the remainder of the Sustainable Communities section, to allow a balanced and holistic approach to be taken.
- b) 16 representations were received to the policy at Publication Draft stage. While a significant number expressed support for the policy, some of the issues raised were as follows: -
- i. **The volume of houses and people surely demand a 'new town' approach as in other districts**
- Council response** – The option of locating development in a new town was examined as part of the Sustainability Appraisal (SA10) in 2015. Option 4 looked at a new settlement outside the green belt and the following conclusion was drawn –
- Positive impact in terms of supporting economic growth. Critical mass to support new facilities but could still generate a need to travel to access other key services and employment. Would meet overall housing needs however there would be a lack of choice in terms of location.*
- It was determined that the option would lead to the concentration of development in one part of the district and would not offer scope to meet local needs elsewhere.

- ii. **The Local Plan is delivering too many houses as the population / growth estimates are flawed – adverse impacts on historic environment and amenity of Warwick**

Council response – This has been discussed in detail elsewhere in the Council's evidence and has been the subject of debate at the Examination. The Council is confident its population projections and proposed levels of housing are accurate and will provide in full for the levels of need identified. The impact on the historic environment of additional development has been assessed throughout the submission and subsequent modifications stages (HE03PM, HE04PM).

- iii. **Provisions overly onerous - could place undue burden on the ability to deliver sustainable development. Policy BE1 Layout and Design also outlines a set of prescriptive policy requirements against which the design of proposals will be assessed. Would be sensible to consolidate requirements of Policies SC0 and BE1, other LP requirements related to layout and design of developments, into single policy.**

Council response – noted – the policies perform different roles as part of a hierarchy of policies that address issues around the creation of sustainable communities. This is addressed in more detail in the Council's statement on Policy DS3.

- iv. **EA - Would like to include the following points into this policy as they are significant indicators of sustainable development, furthermore without their inclusion into the text below the proposed policy may be judged as not meeting the requirements of the NPPF, or European legislation.**

Suggest that point j) is re-worded as follows:

“Reduce flood risk on the site and to the wider community through the layout and form of the development, and surface water is managed effectively on site through the incorporation of green infrastructure including Sustainable Urban Drainage systems into all new developments.”

Recommend insertion of text below into the policy:

“h) Development proposals should have regard to and support the actions and objectives of the Severn River Basin Management Plans (RBMPs) and also have regard to the River Severn Catchment Flood Management Plans (CFMPs).

- i) *Protect principal aquifers and the source protection zones associated with public supply boreholes within the northern part of the district, there will be a presumption against development within a groundwater SPZ1 which would physically disturb an aquifer.”*

Council response – this is addressed in the flood and water policies

- v. **Plan fails to follow references to sustainable communities and lifestyles through, fails to set effective priorities and policies to achieve aims - recommends low density urban sprawl which will be dependent on motor vehicles and will not deliver sustainable lifestyles**

Council response – the Council disagrees – the various proposals within the plan relating to development allocations, including those additional sites identified through the

Modifications process, are all subject to any relevant plan policies to deliver sustainable development. The approach to site allocations has been clearly addressed elsewhere in the Council's evidence and the clear strategic approach to development is to ensure new sites are located close to existing built-up areas and in places with access to services, facilities, jobs and education, to minimise the need to travel by car. In addition, the development strategy seeks to ensure that all new development has access to open space and to leisure and recreational activities that will help promote healthy lifestyles.

- vi. **Policy requires additional flexibility for these requirements to be assessed on a site by site basis at the application stage (or in a masterplan or development brief).**

Council response – the explanatory text of the policy refers to the need for development to comply with other more detailed policies in the plan. Taken as a whole, the Council is of the view that there is sufficient flexibility built into the policies of the plan to allow for sometimes competing issues to be balanced and a view reached on the overall suitability of the proposal. While sustainable development will be a major focus of plan delivery, individual proposals will be looked at on their merits in accordance with the most appropriate local plan policies.

- vii. **Part (e) of policy inconsistent with national planning policy and not as effective as it might be – does not clarify what is precisely meant or intended by the term 'measures'. Part (f) of the policy does not clearly and unequivocally reinforce the delivery of part (e) of the policy.**

Council response – Part (e) of the policy refers to "measures" on the basis that given the more overarching, strategic nature of this policy, it would not be appropriate to be too proscriptive. The wording allows for flexibility in determining what measures might be needed in various situations.