



**Warwick District Council  
Local Plan 2029**

**Sustainability Appraisal (SA),  
incorporating Strategic  
Environmental Assessment (SEA)**

**Adoption Statement**

**September 2017**

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# **Warwick District Council Local Plan 2029 Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA): SA Adoption Statement**

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## **This SA Adoption Statement**

1. Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan relating to development. SA incorporates the requirements for Strategic Environmental Assessment (SEA) and this Sustainability Appraisal/Environmental Statement for the Warwick District Council Local Plan has been prepared in accordance with the following requirements:
  - Regulation 36 of the Town & Country Planning (Local Development) (England) Regulations 2004
  - Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004
  - Paragraph 165 of the National Planning Policy Framework 2012

For the purpose of this Statement that complies with planning and environmental assessment Regulations, the integrated appraisal will be referred to as the Sustainability Appraisal (SA).

2. The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations<sup>1</sup> and as guided through Government Planning Practice<sup>2</sup>. This SA Adoption Statement satisfies the requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:

*(a) how environmental considerations have been integrated into the plan or programme;*

*(b) how the environmental report has been taken into account;*

*(c) how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;*

*(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;*

*(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and*

*(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme*

## **Development of the Warwick District Local Plan 2011-2029**

3. The new Local Plan for Warwick District will guide development in the area and inform planning decisions for the period up to 2029. The Local Plan comprises the Vision – “to make Warwick District a Great Place to Live, Work and Visit”; the Spatial Strategy with 5 key priorities; and Objectives to provide the framework to deliver sustainable development. The Plan includes Policies, Proposals and Site Allocations – organised in chapters as follows:

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<sup>1</sup> <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

<sup>2</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

- **Development Strategy** with 4 Strategic Policies and 16 Policies & Proposals
  - **Housing** with 14 Policies guiding a range of housing development and aiming to deliver a minimum of 16,776 new homes
  - **Sustainable Communities** with Policies providing guidance on the built environment, transport, healthy communities, historic environment, natural environment, neighbourhood planning, and waste
  - **Delivery & Monitoring**
4. Considerable work and consultation has been undertaken since 2010 to prepare the Local Plan, including SA/SEA in accordance with the NPPF (2012) and planning practice guidance. Various studies were undertaken to provide the evidence base to inform decision-making, including housing and employment needs; transport, accessibility and air quality assessments; open space and recreational studies; landscape sensitivity; heritage assets; water cycle study and flood risk assessment; and assessments of potential site options. The Council has worked closely with other partners and neighbouring Councils, including studies such as the Strategic Housing Market Assessment, Employment and the City Deal for the Coventry and Warwickshire sub-region; Green Infrastructure; and Green Belt Review. Details of studies undertaken and the evidence underpinning the Local Plan are provided on the Council's website<sup>3</sup>.
5. The plan has been developed through an iterative process with comments made through public consultation being taken into consideration at each stage from issues and options, preferred options, publication draft, focused changes, and submission. The Local Plan was submitted to the Secretary of State for independent Examination in January 2015. The submitted Plan comprises the Publication Draft Plan (April 2014) as amended by the schedule of Focused Changes. Initial public hearings were held for the Examination during May 2015 and as a result of these, the Inspector advised the Council that it had complied with the duty to cooperate but that the Local Plan was not sound in terms of the overall provision of housing. The Council undertook further work and the examination was suspended in October 2015.
6. The Examination was resumed between September and December 2016 and the Council's suggested modifications to the Plan were considered. The main modifications are associated with an uplift in housing requirements from 12,860 to 16,776 new homes (average of 932 per year) in the plan period, and which includes a commitment to meet unmet needs from Coventry (average of 332 per year). The Spatial Strategy was amended to include focusing growth on the southern edge of Coventry in addition to the urban areas of Warwick, Leamington Spa, Whitnash, and Kenilworth, together with the addition of housing site allocations. The main modifications were subject to SA and public consultation 11 March to 22 April 2017.
7. The Planning Inspector's Final Report (28 July 2017) concluded that the Local Plan is sound, subject to the Main Modifications, and could be Adopted. At

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<sup>3</sup> [https://www.warwickdc.gov.uk/info/20410/new\\_local\\_plan](https://www.warwickdc.gov.uk/info/20410/new_local_plan)

each stage of the development of the Local Plan, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised and responses prepared have been documented during the development of the Local Plan and published on the Council's website.

### **How environmental & sustainability considerations have been integrated into the Local Plan; How the Sustainability/Environmental Report has been taken into account**

8. During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Local Plan. The SA was undertaken in accordance with government guidance<sup>4 5</sup> for a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. Since 2013, independent specialist consultants were appointed to carry out the SA for the Council. They worked closely with the plan-making team in an iterative way such that the findings and recommendations from the SA were integrated into each developing stage of the Local Plan.
9. The SA of the Local Plan used the same SA Framework developed during the SA scoping process as the basis for assessing the emerging Local Plan - and as explained in Section 2 of the submitted SA Report (April 2014). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during the SA scoping to compile a Framework of Objectives and Decision-Aiding Questions that seek to resolve the sustainability issues identified and relevant to the plan and the Warwick District area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.
10. The SA considered the likely significant effects of the implementation of the Local Plan on the sustainability objectives for the Warwick District area. For each aspect of the Local Plan, the assessment against the SA Objectives was recorded with a narrative provided describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium and long term, permanent, and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported.
11. The findings and recommendations of the SA informed plan-making and were integrated into the further development of the Local Plan - and as set out in the Submitted SA Report (April 2014) and the SA Addendum Report (October 2014 for the Focused Changes), and the SA Addendum Report (February

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<sup>4</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>5</sup> <http://www.pas.gov.uk/guidance>

2016) accompanying the Main Modifications to the Local Plan. The SA Reports recorded that overall, the Local Plan is considered to have likely significant positive effects and sufficient mitigation measures are in place to minimise or avoid significant negative effects, as follows:

- **Housing:** Major cumulative effects with housing distributed across the urban and rural areas with Policies to ensure a suitable mix of homes to meet the needs of all people in the area, protect the existing built environment and require new development to be well-designed and high quality.
- **Economy & Employment:** Major and cumulative effects through provision of employment land, supporting economic growth and maintaining the shopping roles for town centres.
- **Communities & Health:** Major positive effects through protecting and enhancing accessibility to community facilities and services, including open space for recreation and health.
- **Transport & Air Quality:** Policies seek to improve sustainable transport modes and the Infrastructure Delivery Plan sets out a range of transport infrastructure that will be delivered to support the proposed development – with the potential for positive effects. Policies protect against pollution and such mitigation measures will ensure at least neutral effects for air quality.
- **Climate Change & Flooding:** Policies seek to address the impacts of development on the road network and encourage sustainable transport modes such that the Plan is unlikely to have significant negative effects on climate change as a result of increased traffic.
- **Water Resources & Quality:** Policies protect the water environment and encourage sustainable drainage systems such that these mitigation measures should ensure that there are no significant negative effects.
- **Natural Environment (Landscape, Soils, Biodiversity):** The level of growth has the potential for major long-term effects on the natural environment; however, mitigation measures are in place as the Plan seeks to direct development away from sensitive areas and Policies should protect the environmental assets such that there will be no residual significant negative effects on landscape and biodiversity. The Local Plan will lead to the loss of large areas of the best and most versatile agricultural land with cumulative negative effects.
- **Cultural Heritage:** The Plan seeks to direct development to the available and suitable areas with least constraint; Policies also seek to protect and enhance heritage such that significant negative effects are not likely.
- **Waste:** Policies include provision for sustainable waste management such that potential negative effects on such material assets are mitigated.

12. Where relevant, the SA made recommendations for mitigating likely negative effects, for example, by suggesting refinements of policy wording and, in particular, the findings of the SA guided the selection of potential site allocations by identifying sustainability issues especially the cumulative effects of development for settlements and sensitive receptors.

13. The proposed changes and Main Modifications to the Local Plan arising from the Examination and issues discussed at the Hearings were subject to SA, reported and subject to consultation. Generally, the SA found that the changes to the Local Plan strengthened the positive effects that had been identified, particularly for housing and community objectives. The modifications strengthen and confirm implementation of mitigation measures, including site-specific requirements that confirm protection or enhancement of environmental and heritage assets. This improved the overall sustainability of the Local Plan.
14. The SA reports have been available on the Council's website and at each stage, the responses to comments made and issues raised have been reported. Throughout, the appraisals have been proportionate and appropriate to the stages of plan-making. Thus, environmental and sustainability considerations have been integrated and the SA Reports taken into account throughout the plan-making process.

### How the results of consultation have been taken into account

15. Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the Local Plan preparation and the SA as follows:

Local Plan Documents & Consultation	SA Documents & Consultation
Evidence gathering	<b>SA Scoping Report (2011)</b> Prepared by WDC Public Consultation 17 March – 15 July 2011
<b>Preferred Options: Issues, Growth Scenarios &amp; Draft Objectives</b> Consultation 1 June -3 August 2012	<b>Initial SA Report (May 2012)</b> Prepared by WDC Public Consultation 1 June – 3 August 2012
<b>Revised Development Strategy</b> Consultation June-July 2013	<b>Interim SA Report (June 2013)</b> Prepared by Enfusion Consultation June – 29 July 2013
<b>Village Sites &amp; Rural Settlement Boundaries</b> Consultation December 2013-January 2014	<b>Villages SA (November 2013)</b> Prepared by Enfusion Consultation December 2013-January 2014
<b>Publication Draft Local Plan</b> (April 2014) Consultation 16 May – 27 June 2014	<b>SA Report (April 2014)</b> Prepared by Enfusion Consultation 16 May – 27 June 2014
<b>Focused Changes</b> Consultation 31 October – 12 December 2014	<b>SA Addendum Report (October 2014)</b> Prepared by Enfusion Consultation 31 October – 12 December 2014
<b>Submission Local Plan</b> (Publication Draft + Focused Changes) January 2015	<b>SA Report &amp; Addendum Report (April &amp; October 2014)</b>
<b>Examination</b> 6-12 May 2015	

<b>Proposed Modifications</b> (February 2016) Consultation March-April 2016	<b>SA Addendum Report (February consultation &amp; June submission 2016)</b>  Consultation March-April 2016
<b>Resumed Examination</b> 27 September – 15 December 2016	
<b>Main Modifications</b> (March 2017) Consultation 11 March – 22 April 2017	<b>SA Further Addendum Report (February 2017)</b> Consultation 11 March – 22 April 2017
<b>Inspector's Final Report</b> Local Plan found sound 28 July 2017	
<b>Local Plan 2029 Adoption</b> September 2017	<b>SA Adoption Statement</b> September 2017 (this report)

16. SA and consultation responses have been considered in an iterative and ongoing way with the plan-making process and in accordance with the requirements of the SEA Regulations. Representations have been recorded and the responses made to issues and concerns raised have been published, including at key statutory stages, as follows:
- Appendix VIII of Submission SA Report (April 2014) summarises comments received and the Council's responses including those made on the SA Scoping consultation
  - Appendix V of Proposed Modifications Submission SA Further Addendum Report (February 2017)

All representations are available to view on the Council's consultation system.

### **Reasons for choosing the Local Plan as adopted, in the light of other reasonable alternatives**

17. The SEA Regulations requires assessment of the likely significant effects of implementing the plan and "*reasonable alternatives*" taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. Extant SA/SEA guidance advises that the term "*reasonable alternative*" should be taken to mean "*realistic and relevant*" i.e. deliverable and within the timescale of the plan.
18. At each stage of the development of the Local Plan, all strategic options and any reasonable alternatives to policy and site allocation proposals have been considered and assessed through SA/SEA. Options for the level of growth and spatial distribution were considered at the Issues & Options stage in 2012; this included consideration of three scenarios for development growth.



19. Further alternatives were considered for Preferred Options stage in 2013 - this included 3 options for employment and housing growth; 4 options for the broad location of growth; and 4 options for the distribution of housing sites. With the revised Development Strategy in May 2013, 2 options for level of growth and 4 options for location of growth were investigated through SA.
20. The reasons for progressing or rejecting options are provided in Section 4 (tables 4.9, 4.11, 4.12) of the Submission SA report (April 2014). The do-nothing scenario is not an option for a local plan as councils are required to provide for identified development needs; however, this was considered by the SA process and the SA reported that significant negative effects on environmental factors were likely without a plan and that positive effects for socio-economic factors were less likely to be implemented.
21. Overall, the reasons for choosing the Local Plan as adopted include that the adopted Local Plan progresses the Vision, Objectives and Strategy for high quality development planning in the Warwick District area with the most benefits and the least negative effects for sustainable development.

**Measures that are to be taken to monitor the significant sustainability & environmental effects of the implementation of the Local Plan**

22. The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Monitoring Reports<sup>6</sup> on the progress of Local Plans. Government Guidance on SA/SEA advises a pragmatic approach with shared monitoring for the SA/SEA and the Plan. The Warwick District Council Monitoring Framework includes a wide range of indicators that also relate to the SA Framework. It is considered that these indicators will be sufficient to identify any unforeseen adverse effects at an early stage, and provide information on the predicted effects from the SA. Monitoring of the Local Plan will be incorporated into the Council's Monitoring Report available to view on the Council's website.

For further information, please refer to the Council's website:

[www.warwickdc.gov.uk](http://www.warwickdc.gov.uk)

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<sup>6</sup> [https://www.warwickdc.gov.uk/info/20376/planning\\_policy/270/monitoring\\_reports](https://www.warwickdc.gov.uk/info/20376/planning_policy/270/monitoring_reports)