



# **Warwick District Local Plan 2011-2029: Net Zero Carbon DPD**

**Sustainability Appraisal (SA)  
incorporating Strategic Environmental  
Assessment (SEA), Equality Impact  
Assessment (EqIA) & Habitats  
Regulations Assessment (HRA)  
Report**

**March 2022**

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# Warwick Local Plan 2011-2029: Net Zero Carbon DPD

## Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA) & Habitats Regulations Assessment (HRA)

March 2022

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Non-Technical Summary (NTS) (available separately)

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## 1.0 INTRODUCTION

### **Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA)**

- 1.1 Strategic Environmental Assessment (SEA)<sup>1 2</sup> is a systematic process used during the preparation of plans and policies and it aims to provide a high level of protection for the environment. Sustainability Appraisal (SA) is a process that similarly investigates plans and policies, including consideration of socio-economic factors in the same way as environmental factors. SA incorporating SEA is a mandatory requirement for Local Plan Documents in accordance with planning legislation<sup>3</sup> and paragraph 32 of the National Planning Policy Framework (revised 2018, updated 2019 and July 2021)<sup>4</sup>. Government advises<sup>5</sup> that an integrated approach should be taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
- 1.2 Local Plan Documents must also be subject to Habitats Regulations Assessment (HRA)<sup>6</sup>. The Conservation of Habitats & Species Regulations (2017, amended 2018)<sup>7</sup> afford a high level of protection to sites in a network of internationally important sites designated for their ecological status. These sites comprise European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar<sup>8</sup> sites. It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site. HRA is a two staged process – initially screening and then appropriate assessment (if significant adverse effects are screened as likely).
- 1.3 National Planning Practice Guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. These key stages and tasks are applicable to the SA process for the Warwick Net Zero Carbon DPD. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses. The role of the SA is to inform the plan-making process.
- 1.4 This SA Report explains the Stage A Scoping that was completed earlier and sent to the statutory consultation bodies in accordance with good practice. It

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<sup>1</sup> EU Directive 2001/42/EC

<sup>2</sup> Environmental Assessment of Plans and Programmes Regulations, 2004  
<https://www.legislation.gov.uk/nisr/2004/280/contents/made>

<sup>3</sup> Section 19(5) of the 2004 Planning & Compulsory Purchase Act and Regulation 22(a) of the Town & Country Planning (Local Planning) (England) Regulations 2012

<sup>4</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>5</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

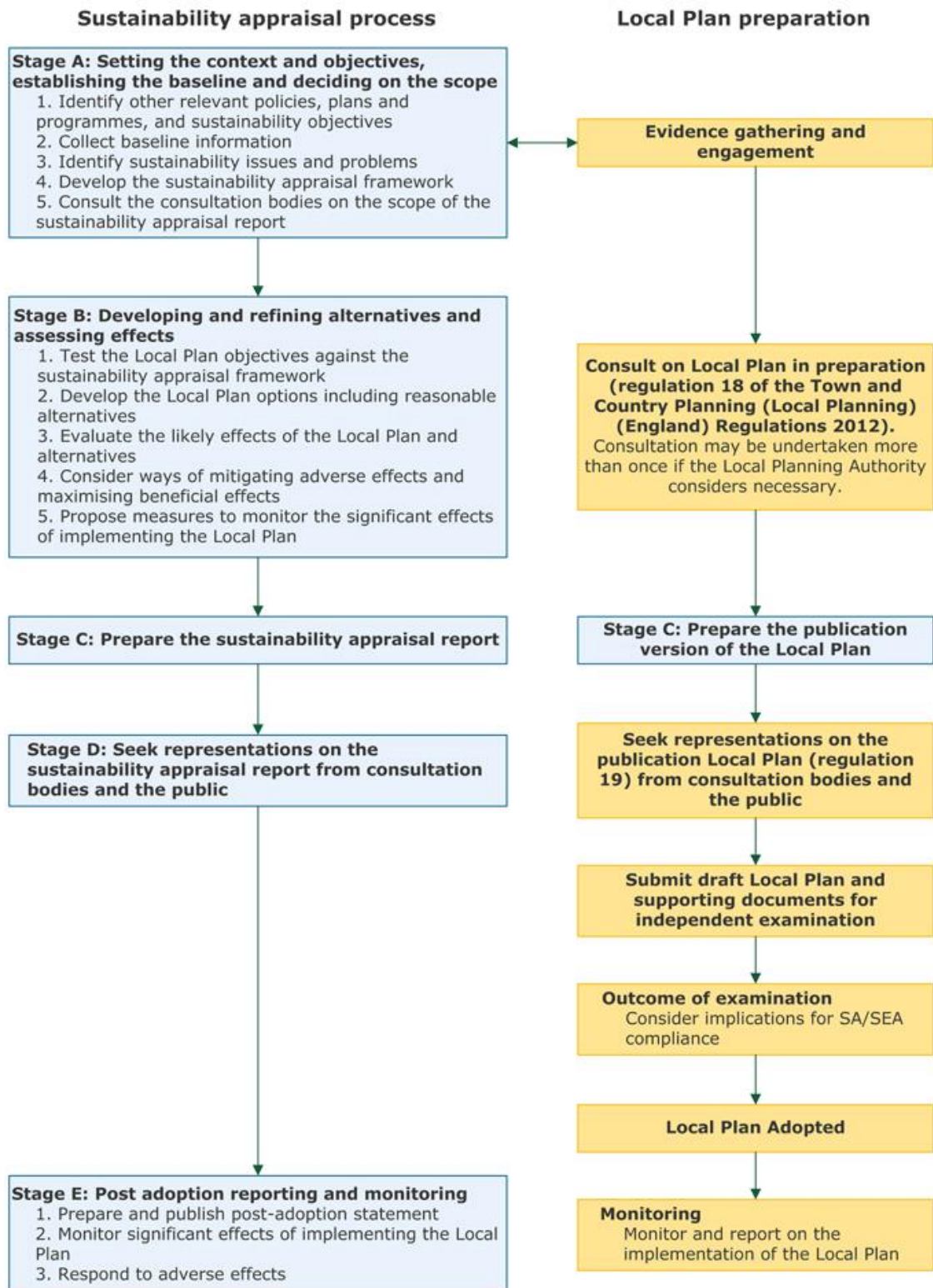
<sup>6</sup> <https://www.gov.uk/guidance/appropriate-assessment>

<sup>7</sup> <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

<sup>8</sup> Support internationally important wetland habitats and are listed under the Ramsar Convention on Wetlands of International Importance

reports the findings of Stage B Alternatives and Assessment and comprises Stage C Preparation of the SA Report. This SA Report accompanies the Warwick Net Zero Carbon DPD on public consultation for Stage D and seeks comments from the public and the statutory consultees.

**Figure 1.1: SA and Plan-making Stages and Tasks**



## **Equality Impact Assessment (EqIA) & Health Impact Assessment (HIA)**

- 1.5 Under the Equality Act (2010), public authorities must in the exercise of their functions, have due regard to the need to eliminate discrimination, promote equality of opportunity, and foster good relations between people who share a relevant protected characteristic and persons who do not. An Equality Impact Assessment (EqIA) is a tool that helps ensure that the different needs of people are taken into account as far as possible and demonstrates that an authority has undertaken its Public Sector Equality Duty (PSED, 2011). An EqIA has been undertaken of the draft NZC DPD and the findings are presented in Appendix II of this SA Report.
- 1.6 Health Impact Assessment (HIA) is not a statutory requirement for planning authorities, but it is good practice in plan-making. Health considerations are a requirement of the SEA Regulations and thus the overall SA process. Health and wellbeing are affected by multiple determinants and include access to health and social care, good quality housing, healthy food, freedom from pollution, open and green space, reducing crime and fear of crime, and access to employment and services. These factors were taken into account in the development of method for the SA of the NZC DPD and thus integrated into the overall assessment process.

## **The Warwick Local Plan 2011-2029**

- 1.7 The overarching development plan document (DPD) for the Warwick District area is the Local Plan that was adopted in September 2017<sup>9</sup>. The Local Plan set out a commitment to draft two DPDs for the District: Gypsy & Traveller DPD (Policy H7) and Canalside DPD (Policy DS17). The Council has also published a Supplementary Planning Document (January 2019)<sup>10</sup> to update the situation with regard to air quality and reflect the increasing concern about air quality and climate change. The Local Plan DPDs, SPDs and Neighbourhood Plans comprise the hierarchy of planning documents that, together with the NPPF, guide applications and decisions for new development in the Warwick District area.
- 1.8 Warwick District Council declared a Climate Emergency<sup>11</sup> on 27 June 2019. This recognises that the current global target to cut carbon emissions by 80% by 2050 is unlikely to be enough to avoid a catastrophic change in our climate. Declaring such a Climate Emergency makes it a requirement to take immediate action to drastically reduce carbon emissions. The Council has made a number of commitments, as follows:
- Becoming a net-zero carbon organisation, including contracted out services, by 2025

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<sup>9</sup> [https://www.warwickdc.gov.uk/info/20410/new\\_local\\_plan](https://www.warwickdc.gov.uk/info/20410/new_local_plan)

<sup>10</sup> [https://www.warwickdc.gov.uk/downloads/file/5043/air\\_quality\\_spd](https://www.warwickdc.gov.uk/downloads/file/5043/air_quality_spd)

<sup>11</sup> [https://www.warwickdc.gov.uk/info/20468/climate\\_change/1437/climate\\_emergency\\_declaration](https://www.warwickdc.gov.uk/info/20468/climate_change/1437/climate_emergency_declaration)



- Facilitating decarbonisation by local businesses, other organisations and residents so that total carbon emissions within Warwick District are as close to zero as possible by 2030
- Working with other local councils to lobby central government to help address the above points including by funding and changing regulation
- Engaging with and listening to all relevant stakeholders including members of the Warwickshire Youth Parliament regarding approaches to tackling the climate emergency.
- Ensuring that tackling the Climate Emergency is central to the strategic business plan – both in terms of adaptation and mitigation.
- Producing within six months an action plan to implement these commitments

- 1.9 The Council adopted a Climate Emergency Action Programme (CEAP) in February 2020, and this recognised the importance of the planning system in helping to achieve its ambitions – through developing policies and setting standards aimed at reducing carbon emissions.
- 1.10 Stratford-on-Avon District Council also declared a climate emergency in 2019, and with the proposal to merge both Councils into a single District Council for South Warwickshire, Warwick and Stratford-on-Avon Councils are working together on becoming a carbon neutral organisation by 2025, and for the area of South Warwickshire to be as close to carbon neutral as possible by 2030. The Council's climate change ambitions have been further refined (agreed at meeting 8 July 2021) and with shared ambitions for Warwick DC and Stratford-on-Avon DC adopted and the recommendations of the People's Inquiry into climate change incorporated into the programme of work subject to being able to identify appropriate resources. The joint Climate Change Action Programme<sup>12</sup> was agreed in November 2021.
- 1.11 A key aspect is to develop and implement policies that will deliver improved net zero carbon building standards. The new Warwick Net Zero Carbon DPD provides the building standards policies to achieve this and (except where policies within the existing Local Plan are replaced by the DPD), these policies supplement those within the adopted Warwick District Local Plan, 2011 – 2029. The DPD outlines the issues facing the Council with regard to climate change and sustainable methods of construction and occupation in order to guide new development to help facilitate delivery of these commitments.

### **The Warwick Net Zero Carbon Development Planning Document (DPD)**

- 1.12 The Net Zero Carbon DPD has been prepared in accordance with the commitments made by the Council in respect of its declaration of Climate Emergency. These commitments necessitate the preparation of such a climate change DPD ahead of the Local Plan review to help enable Warwick

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<sup>12</sup> [https://www.warwickdc.gov.uk/info/20468/climate\\_change/1718/climate\\_emergency\\_action\\_programme](https://www.warwickdc.gov.uk/info/20468/climate_change/1718/climate_emergency_action_programme)

district to be as close as possible to net zero by 2030. The DPD has been prepared in line with recent Government recommendations, for example, from Preparing for Climate Change (2019)<sup>13</sup> and in consideration of the IPCC Special Report on global warming (2018)<sup>14</sup>, and the update to Planning Practice Guidance (2019) that asserts addressing climate change is one of the core land use planning principles that the NPPF expects to underpin plan-making and decision-making.

- 1.13 The objectives of the Local Plan have sustainability at their heart and this DPD will further progress the Local Plan Objective B: Providing well-designed new developments that are in the right location and address climate change. This new DPD will form the framework within which developments are expected to conform. The Local Plan (adopted 2017) includes policies that deal with many aspects of climate change. The new DPD expands and updates these policies and introduces new standards in development that will positively contribute to the new targets set by both local and central government since the Local Plan was adopted.
- 1.14 Work was undertaken with other Warwickshire councils on air quality and a joint Supplementary Planning Document (SPD)<sup>15</sup> was adopted in January 2019. The document aims to assist in reducing the air quality impacts of development and the new Net Zero Carbon DPD has been prepared with a clear understanding of the implications of improvements to air quality and climate change.
- 1.15 Warwick District Council has committed to:
- Becoming a net-zero carbon organisation, including contracted out services, by 2025
  - Facilitate decarbonisation by local businesses, other organisations, and residents so that total carbon emissions within Warwick District are as close to zero as possible by 2030
- 1.16 The draft Net Zero Carbon<sup>16</sup> DPD comprises the following:
- The Local Context
  - The National Context
  - The Planning Policy Context
  - Aims and Objectives
  - Overarching Strategy
    - Policy NZC1 Strategy to achieve Net Zero Carbon Development
  - Reducing Energy Demands
    - Policy NZC2(A) Net Zero Carbon - Making Buildings Energy Efficient

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<sup>13</sup> <https://www.theccc.org.uk/>

<sup>14</sup> <https://www.ipcc.ch/sr15/chapter/spm/>

<sup>15</sup> [https://www.warwickdc.gov.uk/info/20794/supplementary\\_planning\\_documents\\_and\\_other\\_guidance](https://www.warwickdc.gov.uk/info/20794/supplementary_planning_documents_and_other_guidance)

<sup>16</sup> It may be noted that for the purposes of this new DPD, carbon refers to all greenhouse gas emissions (excluding water vapour).

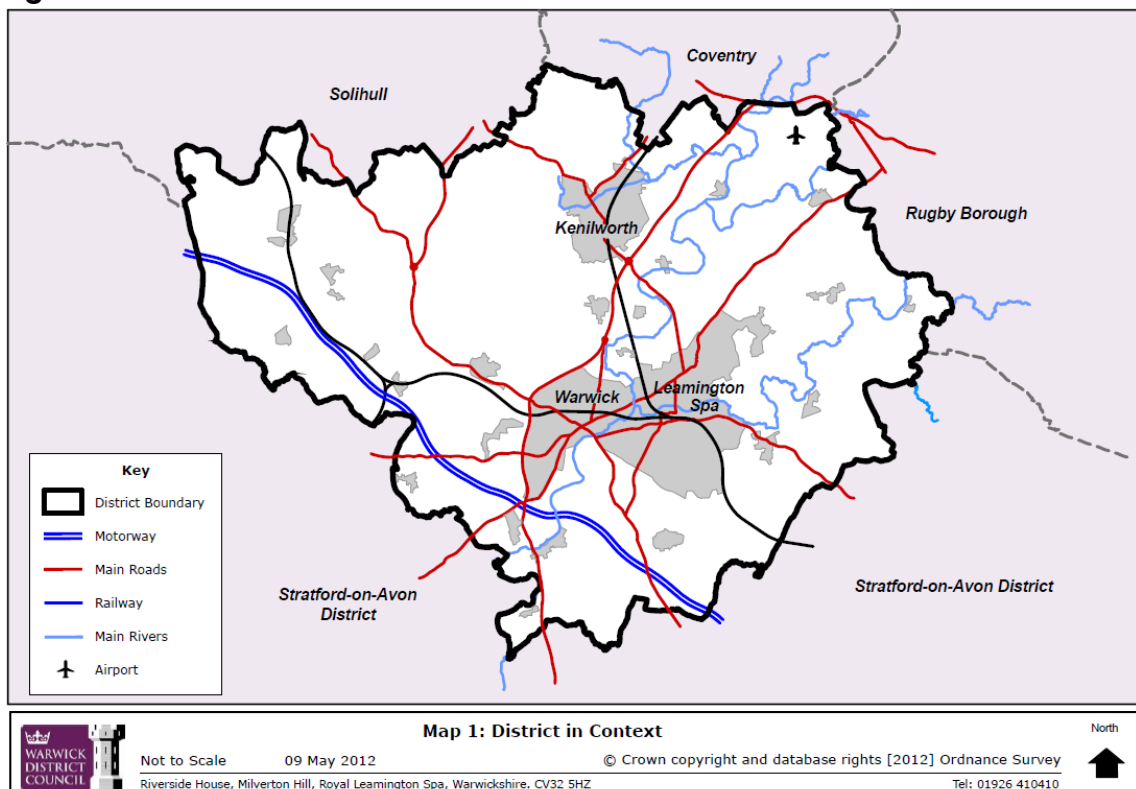


- Energy Sources  
Policy NZC2(B) Net Zero Carbon - Energy Sources
- Carbon Offsetting  
Policy NZC2(C) Net Zero Carbon – Offsetting Residual Carbon
- Embodied Carbon  
NZC3 Net Zero Carbon – Embodied Carbon
- Existing Buildings  
Policy NZC4 Net Zero Carbon – Existing Buildings
- Viability
- Warwick District Local Plan 2011-2029: Policies superseded or amended
- Glossary  
Appendix 1: Policy Context

1.17 The DPD explains that the Local Plan was grounded in sustainability but prepared at a time when the new NPPF had recently been published. It also explains that the Local Plan was examined at a time of debate regarding the ability for local planning authorities to prepare local building standards policies. Government has now confirmed that local planning authorities may set their own local building standards and therefore, this DPD expands upon Local Plan policies and introduces standards in development to positively contribute to new targets for carbon. The DPD will also replace the adopted Sustainable Buildings SPD (2008) that is in much need of updating.

1.18 The extent of the Warwick District area is shown in the map following:

**Figure 1.2: Location of Warwick District**



## Consultation

- 1.19 The statutory environmental consultation bodies (Environment Agency, Natural England, Historic England) were consulted upon the SA/SEA & HRA scoping and screening report (May 2021) during May-June 2021. The Regulation 18 draft Net Zero Carbon DPD and its accompanying initial SA/HRA Report (September 2021) were subject to public consultation (26 July – 13 September 2021). This updated SA Report is being published alongside the revised draft Net Zero Carbon DPD for Regulation 19 consultation. Any comments on the draft DPD and SA Report will be included in the submission of documents to the Secretary of State for independent examination by a planning inspector of the proposed DPD.

## Compliance with the Requirements of the EU SEA Directive

- 1.20 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process and specify that, if an integrated appraisal is undertaken (i.e., SEA is subsumed within the SA process), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. This SA Report presents the SA/SEA testing of the emerging Development Plan Document and includes a Non-Technical Summary and an appendix that clearly signposts the requirements for reporting the SEA.

## This SA Report

- 1.21 The Warwick Local Plan was subject to SA/SEA (Submission Report 2015 & Addendum 2017)<sup>17</sup> and HRA (Screening Report 2014) during its preparation and examination, including formal and public consultation. The Net Zero Carbon DPD must be in conformity with the adopted Local Plan, and it is important that the SA/SEA is also in conformity with the previous assessments. However, the NPPF was revised in 2018 and updated in 2019 & 2021, including significant implications for biodiversity net gain and consideration of climate change. This SA seeks to incorporate the updated requirements, including the information set out in planning practice guidance. It may also be noted that the DPD and the SA are being prepared during a time of planning change with the implementation of the Environment Act (2021)<sup>18</sup> and further updating of the NPPF anticipated.
- 1.22 A Court of Justice of the European Union (CJEU) Judgment (2017)<sup>19</sup> has had implications for the established methods in the UK for undertaking HRA (and through which the Warwick Local Plan had been assessed). The implication of this judgment is that competent authorities cannot take account of any integrated or additional avoidance or reduction measures when considering at the Habitats Regulations Assessment (HRA) screening stage whether a plan

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<sup>17</sup> [https://www.warwickdc.gov.uk/downloads/download/654/sustainability\\_appraisal](https://www.warwickdc.gov.uk/downloads/download/654/sustainability_appraisal)

<sup>18</sup> <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

<sup>19</sup> People over Wind & Sweetman v Coillte Teoranta Case C-323/17

is likely to have an adverse effect on a European Site. Therefore, this report seeks to update the assessment process and make explicit that the initial stage of HRA screening has been applied without consideration of embedded mitigation such as through Local Plan policies.

- 1.23 This report has been prepared in accordance with regulatory requirements, government guidance and in consideration of good practice. A proportionate approach has been taken since the Local Plan was adopted in 2017 and the DPD focuses on one issue of net zero carbon for the District ahead of the ongoing preparation of the new Joint Local Plan for South Warwickshire. The HRA considerations have been addressed within this SA Report. Warwick District Council has commissioned independent SA/SEA & HRA specialists Enfusion Ltd to undertake the work on behalf of the Council.
- 1.24 Section 2 of this SA Report describes the approach taken and methods used with the baseline characterisation presented in Section 3. The approach to options in plan-making and reasonable alternatives in SA/SEA is explained in Section 4, and the findings of the SA/SEA assessment and updated HRA are presented. An outline of the approach for monitoring is set out in Section 5 and conclusions with next steps outlined in Section 6.

## 2.0 SUSTAINABILITY APPRAISAL METHODS

### Approach, Guidance & Methods

- 2.1 SA incorporating SEA is a mandatory requirement for Local Plan documents in accordance with paragraph 32 of the National Planning Policy Framework (updated 2021)<sup>20</sup>. Guidance on undertaking SA/SEA of plans is provided through UK government planning practice<sup>21</sup>; guidance<sup>22</sup> on HRA for plans is also available. The SA and HRA have been undertaken in accordance with this government guidance and drawing upon professional experience.
- 2.2 The SA has built upon the previous SA work undertaken during the development of the Local Plan, refining it to be focused on the Net Zero Carbon DPD with relevant sustainability topics and issues. The opportunity was taken to update the assessments in line with the revised NPPF and the updated requirements for HRA.
- 2.3 Available information from Defra Magic maps, Environment Agency flood risk maps, the Council's evidence base for the local planning documents, and the evidence base for the draft Net Zero Carbon DPD, together with professional judgment, was used to identify the sensitivity of the DPD area and to undertake the assessments.

### Screening & Scoping: SA/SEA & HRA/AA

- 2.4 The scoping for SA/SEA considered whether the policies in the emerging DPD are likely to have significant sustainability effects, as follows:
  - how they might affect the environment, communities or economy
  - whether any of the proposals are likely to affect a "sensitive area", such as a Site of Special Scientific Interest (SSSI) or an internationally designated Site for nature conservation (SAC, SPA, Ramsar)
  - whether implementation of policies in the plan might lead to new development in the future

The DPD includes new/updated policies that could affect the nationally important natural and historic environmental assets and their settings that are throughout the Warwick district area.

- 2.5 The scoping/screening for HRA considered whether the draft DPD could have any likely significant effects (LSEs) on internationally designated sites – Special Protection Areas (SACs), Special Areas of Protection (SPAs) and Ramsar – alone or in-combination with other plans or projects. There is only one isolated internationally designated site – Ensor's Pool SAC – within the Warwick District

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<sup>20</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

<sup>21</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>22</sup> <https://www.gov.uk/guidance/appropriate-assessment>

area. There are no other designated sites within a 20 km radius and therefore, unlikely to be significant effects.

- 2.6 The HRA process comprises two stages: an initial screening stage considers whether a plan or project is likely to have a significant effect on a European site either alone or in combination with other plans or projects. If likely significant effects (LSEs) are identified through the screening stage, then the plan or project should be tested through a second stage – the appropriate assessment (AA). The Warwick Local Plan and the DPD do include relevant policy mitigation and the approach essentially reinforces this through the updated methodology - thus making the process and conclusions explicit with regard to the updated requirements. This precautionary approach is being taken in particular consideration of the significant changes to HRA methods in the UK since the screening undertaken for the Local Plan.

## The SA Framework

- 2.7 The SA Framework provides the basis by which the sustainability effects of the DPD are described, evaluated and options compared. It includes objectives, elaborated by decision making criteria, that are relevant to the objectives of the Local Plan and the DPD, the role and duties of Warwick District Council, and sustainable development in the Warwick District area. These objectives were identified through the SA scoping stage for the Local Plan from the information collated in the plans & programmes review, baseline analysis, identification of sustainability issues, and subject to consultation. This SA Framework is the same as had been used to assess the Local Plan (adopted in 2017) in order to clearly demonstrate conformity with the higher level of development planning and assessment, as follows:

**Table 2.1: SA Framework**

| Objective   | Key Questions  |
|---|--|
| 1. To have a strong and stable economy<br><br><i>SEA Directive topics: population &amp; health</i>                      | Will it help meet the employment needs of the local community?<br>Will it help diversify the economy in general?<br>Will it enhance the vitality and viability of the town centre?<br>Will it encourage or enable inward investment?<br>Will it promote investment in future prosperity (for example by supporting R&D, small businesses and/or encouraging skills development)? |
| 2. To enable a range of sustainable transport options<br><br><i>SEA Directive topics: air, climatic factors, health</i> | Will it encourage the use of public transport, walking or cycling?<br>Will it help reduce traffic congestion?  |
| 3. To reduce the need to travel<br><br><i>SEA Directive topics: air, climatic factors, health</i>                       | Will it reduce the overall need to travel?<br>Will it help reduce the need to travel by car / lorry?   |

|  |   |
|--|---|
| <p>4. To reduce the generation of waste and increase recycling</p> <p><i>SEA Directive topics: soil, health, biodiversity</i></p>                      | <p>Will it encourage the management of waste in line with the waste management hierarchy, giving first priority to reducing waste, followed by reuse and recycling, then other forms of energy recovery and lastly disposal?<br/>Will any residual disposal be undertaken in the least environmentally detrimental manner?</p>  |
| <p>5. To ensure the prudent use of land and natural resources</p> <p><i>SEA Directive topics: biodiversity, flora, fauna and soil</i></p>              | <p>Does it optimise the use of previously developed land and buildings?<br/>Will it minimise development on greenfield land?<br/>Will it reduce the amount of derelict, degraded or underused land?<br/>Does it make efficient use of existing physical infrastructure (i.e. instead of requiring new infrastructure to be built)?<br/>Does it encourage resource-efficient design and/or construction (in terms of water and/or raw materials)?<br/>Does it encourage the use of materials from alternative and renewable sources?</p> |
| <p>6. To protect and enhance the natural environment</p> <p><i>SEA Directive topics: biodiversity, flora, fauna and landscape</i></p>                  | <p>Will it protect and enhance species, habitats and sites designated for their nature conservation interest?<br/>Will it safeguard and/or enhance the character of significant landscape areas?</p>  |
| <p>7. To create and maintain safe, well-designed, high quality built environments</p> <p><i>SEA Directive topics: landscape, cultural heritage</i></p> | <p>Will it help provide a sense of identity and local distinctiveness?<br/>Will it protect or enhance the setting of the town?<br/>Will it promote design that enhances townscapes?<br/>Will it protect or improve safety in built environments?</p>  |
| <p>8. To conserve and enhance the historic environment</p> <p><i>SEA Directive topics: cultural heritage</i></p>                                       | <p>Will it conserve and enhance sites, features and areas of historical, archaeological and cultural value?<br/>Will it encourage appropriate use of and/or access to buildings and landscapes of historical/cultural value?</p>  |
| <p>9. To create good quality air, water and soils</p> <p><i>SEA Directive topics: soil, water, air</i></p>   | <p>Will it affect local air quality?<br/>Will it affect air quality in the Air Quality Management Areas?<br/>Will it minimise pollution of soils?<br/>Will it minimise light and noise pollution levels?<br/>Will it retain the best quality agricultural land?<br/>Will it minimise adverse effects on ground and surface water quality?<br/>Will it prevent deterioration of water quality as measured by the Water Framework Directive?</p>  |
| <p>10. To minimise the causes of climate change by reducing greenhouse gases and increasing the</p>  | <p>Will it reduce overall energy use through increased energy efficiency?<br/>Will it reduce or minimise greenhouse gas emissions?<br/>Will it increase the proportion of energy generated from renewable and low carbon sources?</p>   |



|  |   |
|--|---|
| <p>proportion of energy generated from renewable and low carbon sources.</p> <p><i>SEA Directive topics: air, climatic factors</i></p>   |   |
| <p>11. To adapt to the predicted impacts of climate change including flood risk</p> <p><i>SEA Directive topics: water, climatic factors</i></p>  | <p>Will it reduce or minimise the risk of flooding?</p> <p>Will it minimise sensitive development in medium and high risk flood zones?</p>  |
| <p>12. To meet the housing needs of the whole community (ensuring the provision of decent and affordable housing for all, of the right quantity, type, size and tenure)</p> <p><i>SEA Directive topics: population, health</i></p> | <p>Is it enabling the housing target to be met?</p> <p>Does it provide for the development of balanced communities by encouraging an appropriate mix of housing (in terms of type, size and tenure)?</p> <p>Will it reduce homelessness and housing need?</p> <p>Will it reduce the number of empty homes?</p>    |
| <p>13. To protect, enhance and improve accessibility to local services and community facilities</p> <p><i>SEA Directive topics: population, health</i></p>   | <p>Will it maintain and enhance existing community facilities?</p> <p>Will it put unacceptable pressure on existing services and community facilities?</p> <p>Will it improve access to local services and facilities for the whole community?</p>  |
| <p>14. To improve health and well being</p> <p><i>SEA Directive topics: health</i></p>   | <p>Will it promote healthy lifestyles?</p> <p>Will it provide and improve access to health and social care services?</p> <p>Will it provide and/or enhance the provision of open space?</p> <p>Will it improve opportunities to participate in the district's cultural, sport and recreational opportunities?</p> |
| <p>15. To reduce poverty and social exclusion</p> <p><i>SEA Directive topics: population, health</i></p>   | <p>Will it reduce poverty and social exclusion in those areas most affected?</p>  |
| <p>16. To reduce crime, fear of crime and antisocial behaviour</p> <p><i>SEA Directive topics: population, health</i></p>  | <p>Will it reduce actual levels of crime?</p> <p>Will it reduce the fear of crime?</p> <p>Will it reduce / discourage anti-social behaviour?</p>  |

**Table 2.2: Significance Key**

| Categories of Significance |                |   |
|----------------------------|----------------|---|
| Symbol                     | Meaning        | Sustainability Effect   |
| ++                         | Major Positive | Proposed development encouraged as would resolve existing sustainability problem  |
| +                          | Minor Positive | No sustainability constraints and proposed development acceptable   |
| =                          | Neutral        | Neutral effect  |
| ?                          | Uncertain      | Uncertain or Unknown Effects  |
| -                          | Minor Negative | Potential sustainability issues: mitigation and/or negotiation possible   |
| --                         | Major Negative | Problematical & improbable because known sustainability issues; mitigation likely to be difficult and/or expensive  |
| +                          | -              | SA Objectives 2, 5, 6, 13 and 14 consider more than one topic & as a result there is the potential for different effects. For example, Objective 2 relates to encouraging the use of public transport, walking & cycling as well as reducing traffic congestion. Development could have a negative effect on traffic; however, it could also provide new cycle/walking routes with a positive effect – and thus, two symbols. |

## Appraising the Net Zero Carbon DPD

2.8 The assessment of the DPD Policies and the DPD as a whole were presented as a narrative to allow the SA to focus on the aspects of the DPD that are likely to have significant effects, thus providing appropriate detail whilst minimising the number of detailed technical matrices. It allows for the consideration of mitigation measures that may be provided through policies in the adopted Local Plan and embedded within the DPD. This is appropriate and proportional for the level of plan-making and assessment. The SA objectives were grouped into sustainability topics, as follows:

- Economy: SA No 1 Economy
- Housing, Communities, Health & Wellbeing: SA No 12 Housing; SA No 13 Access to Services/Facilities; SA No 15 Reduce Poverty; SA No 16 Reduce Crime
- Transport: SA No 2 sustainable Transport; SA No 3 Reduce Need to Travel
- Air Quality & Climate Change: SA No 9 Good Quality Air; SA No 10 Minimise Causes of Climate Change
- Land/Soil Resources: SA No 4 Reduce Waste; SA No 5 Land/Soil & Sustainable Construction; SA No 9 Good Quality Soils
- Natural Environment: SA No 6 Biodiversity; SA No 6 Landscape; SA No 7 High Quality Design
- Historic Environment: SA No 8 Historic Environment
- Water: SA No 11 Adapt to Impacts of climate change – flooding; SA No 9 Good Quality Water

- 2.9 The assessment included consideration of the likely effects on sustainable development, including short, medium, and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative, and synergistic effects in accordance with Schedule 2 12(3) of the SEA Regulations. Any possibilities for mitigating any potential significant negative effects, or enhancing potential positive effects, were suggested to the plan-makers, as relevant.

### **Assessment of Alternatives in SA/SEA**

- 2.10 The EU SEA Directive 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. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance advises that it is taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan. National planning guidance<sup>23</sup> advises that “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made”.
- 2.11 It had been considered that there are no meaningful other options for this specific topic DPD that would need to be tested through SA. In the initial SA Report (September 2021) it was asserted that doing nothing is not a reasonable alternative for the Council as the local planning authority is required to provide sufficient development land to meet the needs of the local communities for housing and employment. This specific DPD supports and updates the Warwick Local Plan (adopted 2017) with regard to net zero carbon, taking into account the revised NPPF (2021)<sup>24</sup> and other new requirements related to climate change and energy. It thus provides further information and guidance for planning applications to help ensure that the objectives of the Local Plan may be met and helps enable Warwick District to be as close as possible to net zero by 2030.
- 2.12 At the Regulation 18 consultation, it was suggested by one respondent<sup>25</sup> that the SA should test the “do-nothing” and “follow the national approach to improved energy efficiency requirements” as reasonable alternatives. It is agreed that the Council could do nothing, and that it also does have a choice in setting higher energy efficiency standards for new buildings than national requirements set in building regulations. Accordingly, these two alternative scenarios have been tested using the same SA methods.

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<sup>23</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>24</sup> <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

<sup>25</sup> RPS for Taylor Wimpey (September 2012)

## Consultation

- 2.13 The SA/SEA and HRA scoping/screening report (May 2021) was sent to the three statutory environmental bodies in England for 5 weeks consultation in May-June 2021. No comments were received from the Environment Agency at this stage. Historic England advised (letter 28 May 2021) that they consider the SA/SEA screening/scoping opinion findings for the NZC DPD acceptable. They welcomed that the same SA Objective No 8 Historic Environment is to be used as was previously used for the SA of the adopted Local Plan.
- 2.14 Natural England (NE) advised (email 10 June 2021) that they agree with the described approach, SA Framework questions, significance key, and SA report contents. NE provided advice regarding risks to functionally linked watercourses and migratory fish in respect of the Severn Estuary Special Area of Conservation/Ramsar, and to risks in respect of functionally linked land and wild birds of the Severn Estuary Special Protection Area.
- 2.15 A further respondent considered that there were two reasonable alternatives that should be tested through SA.

### 3.0 SUSTAINABILITY CONTEXT & BASELINE CHARACTERISATION

#### Other Plans and Projects

- 3.1 The SA/SEA and Habitats Regulations include a requirement to consider the implications of other relevant plans and projects. This was undertaken during the SA of the Warwick District Local Plan. The key plans and projects relevant to the Net Zero Carbon DPD are as follows:
- UK Committee on Climate Change Reducing UK emissions – 2021 Progress Report<sup>26</sup> with priority recommendations for progressing to net-zero emissions by 2050, including to increase resources for local government
  - The Future Homes Standard: consultation on changes to Part L and Part F of the Building Regulations for new dwellings (2021)<sup>27</sup>
  - UK Net Zero Strategy: Build Back Greener (2021) sets out approaches to keep the UK on the path to achieving net zero carbon by 2050. It builds on existing policies and supports Government's commitment to decarbonise the UK's electricity system by 2035. It introduces Regulations from 2025 through the Future Homes Standard to ensure all new homes in England are ready for net zero by having a high standard of energy efficiency and low carbon heating installed.
  - Environment Act (2021)<sup>28</sup> provides for a cleaner, greener and more resilient country for the next generation
  - Stratford-on-Avon District Local Plan
  - Solihull District Local Plan
  - Coventry District Local Plan
  - Rugby Borough Local Plan
  - Warwick District Neighbourhood Plans<sup>29</sup>
  - Warwick District Green Infrastructure Study (2012)
  - Warwickshire, Coventry & Solihull Green Infrastructure Strategy (2014)<sup>30</sup>
  - Severn River Basin Management Plan (2016)<sup>31</sup>
  - Severn Trent Water Resource Management Plan (2019)<sup>32</sup>
  - Warwickshire Energy Plan (2019)<sup>33</sup>
  - High Speed 2 HS2<sup>34</sup>

<sup>26</sup> <https://www.theccc.org.uk/wp-content/uploads/2021/06/CCC-Joint-Recommendations-2021-Report-to-Parliament.pdf>

<sup>27</sup> <https://www.gov.uk/government/consultations/the-future-buildings-standard>

<sup>28</sup> <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

<sup>29</sup> [https://www.warwickdc.gov.uk/info/20444/neighbourhood\\_plans](https://www.warwickdc.gov.uk/info/20444/neighbourhood_plans)

<sup>30</sup> <https://www.warwickshire.gov.uk/greeninfrastructure>

<sup>31</sup> <https://www.gov.uk/government/publications/severn-river-basin-district-river-basin-management-plan>

<sup>32</sup> <https://www.severntrent.com/about-us/future-plans/water-resource-management/water-resource-managment-plan/>

<sup>33</sup> <https://www.warwickshire.gov.uk/energyplan>

<sup>34</sup> <https://www.hs2.org.uk/where/>

- Warwick District Council with Coventry City Council, Coventry & Warwickshire Public Health, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford District Council and Warwick District Council – Air Quality SPD (2019)<sup>35</sup>
- Decarbonisation & Economic Strategy Bill (2019-2021)<sup>36</sup>
- South Warwickshire Local Plan in preparation<sup>37</sup>

## Baseline Conditions

- 3.2 The baseline characterisation of the Warwick District area was undertaken as part of the SA scoping stage in 2014 and updated as the SA progressed in line with the development of the Local Plan through to adoption in 2017. The key relevant information has been updated further here and the characterisation of the District area relevant to net zero carbon and planning policies may be summarised as follows:
- 3.3 **Biodiversity & the Natural Environment:** There are no internationally designated sites<sup>38</sup> (SACs, SPAs or Ramsar) within a 15 km radius of the Warwick District area; one SAC (Ensor's Pool, Nuneaton) is within a 20 km radius. Areas of environmental national importance in the District as a whole include 7 Sites of Special Scientific Interest (SSSIs) and 15 Sites of Importance for Nature Conservation (SINCs). There is no nationally designated landscape (AONB) but the landscapes in the District are valued for their scenic qualities, rich wildlife and cultural associations, and are fundamental to the intrinsic character and local distinctiveness of the area. Much of the rural areas is designated as Green Belt and their openness is protected.
- 3.4 There are 10 Local Nature Reserves (LNRs)<sup>39</sup> in the Warwick district area and the Council manage these LNRs in partnership with the Warwickshire Wildlife Trust. The reserves have a wide range of habitats from woodland heathland and meadows to marsh. There are also Local Wildlife Sites (LWSs)<sup>40</sup> and rich networks of green infrastructure throughout the District and including the water and canal networks.
- 3.5 **The Historic Environment:** The District has a rich historic and cultural heritage and includes 2,145 Listed Buildings; 30 Conservation Areas; and 11 Registered Parks and Gardens; and Scheduled Monuments.
- 3.6 **Air Quality & Transport:** There are good road and rail links with surrounding major urban areas with two railway stations at Warwick, Leamington Spa, Kenilworth, Hatton and Lapworth. However, air quality and traffic congestion, particularly in the main towns, are key issues. Warwick District Council has

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<sup>35</sup> [https://www.warwickdc.gov.uk/downloads/file/5043/air\\_quality\\_spd](https://www.warwickdc.gov.uk/downloads/file/5043/air_quality_spd)

<sup>36</sup> <https://bills.parliament.uk/bills/2758>

<sup>37</sup> <https://www.southwarwickshire.org.uk/swlp/>

<sup>38</sup> <https://magic.defra.gov.uk/MagicMap.aspx>

<sup>39</sup> [https://www.warwickdc.gov.uk/info/20331/countryside/508/nature\\_reserves](https://www.warwickdc.gov.uk/info/20331/countryside/508/nature_reserves)

<sup>40</sup> <https://data.gov.uk/dataset/669d39c1-df92-4974-aa39-fa815acaba44/warwickshire-local-wildlife-sites-lws>



designated five air quality management areas (AQMAs)<sup>41</sup> due to elevated annual average concentrations of nitrogen dioxide (NO<sub>2</sub>). The AQMAs include Warwick Town Centre, Coventry Road (Warwick), Leamington Spa and two AQMAs in Kenilworth. The Council's recent Air Quality SPD (January 2019) guides new development with regard to transport, air quality, energy and green infrastructure.

- 3.7 **Water Quality, Levels & Resources:** There is a network of rivers and watercourses running through the District, including the canals (The Stratford upon Avon and Birmingham & Fazeley, as well as The Grand Union) and the Warwickshire River Avon. The river runs north to south through the district and then feeds into the Severn Estuary towards the south-west. The networks of watercourses and water bodies are interconnected. Water is abstracted from the canal system for both agriculture and commercial uses. The water levels need to be maintained for navigation and to support the multifunctionality of the water including biodiversity/green infrastructure, recreation/leisure & wellbeing, together with its contribution to climate change resilience and role in sustainable water management.
- 3.8 The local water quality of the canals and River Avon is not precisely known but nationally (Environment Agency, 2018), nitrates are a major issue<sup>42</sup> – mostly water run-off from agricultural land or deposited on land and water from traffic emissions. About 20% of abstractions were considered to be unsustainable in 2017, reducing water levels and damaging wildlife. High winter river flows have increased over the past 30 years, with a subsequent increase in the frequency and magnitude of flooding. There is no clear trend in droughts, but summer river flows and groundwater levels may decrease in the future.
- 3.9 Water is supplied to the Warwick district by Severn Trent Water Ltd within the Strategic Grid Water Resource Zone (WRZ) that extends from the Peak District to Gloucester and covers most of Worcestershire<sup>43</sup>. The Strategic Grid is made up of 14 major water treatment works (WTWs), five reservoir complexes, three major grid booster pumping stations and a number of strategic pipeline network connections and aqueducts – representing a complex interaction of abstraction, treatment and transfer, and particularly focused on the River Trent catchment system. The WRMP includes the ongoing commitment to restore sustainable abstraction.
- 3.10 There appear to be no significant major water proposals that would affect the water systems in the Warwick District area. Severn Trent Water also plans and manages the wastewater treatment and sewerage systems in the Warwick district area. However, the adopted Local Plan (2011-2029) contains Policy FW3 Water Efficiency relating to the conservation of water and the standard imposed is 110 litres/person/day. This recognises that the district is an area of water stress and therefore this more stringent standard was imposed to reflect that situation.

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<sup>41</sup> [https://www.warwickdc.gov.uk/downloads/file/5043/air\\_quality\\_spd](https://www.warwickdc.gov.uk/downloads/file/5043/air_quality_spd)

<sup>42</sup> <https://www.gov.uk/government/publications/state-of-the-environment>

<sup>43</sup> <https://www.severntrent.com/about-us/future-plans/water-resource-management/wrmp-19-documents/>

- 3.11 **Soils/Land Use:** The rural parts of the district comprise mostly agricultural land quality Grades 3a & 3b but there are significant areas of the best and most versatile agricultural land at Grade 2 adjacent to the south-west of Whitnash and north of Leamington Spa<sup>44</sup>.
- 3.12 **Communities, Housing & Employment:** Approximately 90% of the District's population live in the four main urban areas (Royal Leamington Spa, Warwick, Kenilworth and Whitnash) with the remaining 10% living in a number of relatively small villages. These main centres contain a wide range of different types of housing but there are some affordability issues. The population has grown from 124,000 in 2000 to around 142,000 in 2018<sup>45</sup>. Compared to other parts of Warwickshire, a higher proportion of the District's population is of working age. The highest rate of projected population growth in the future is expected to be amongst those aged 65 and over – in line with the rest of the UK.
- 3.13 Neighbourhood Plans (NPs) are the local level of plans that sit within the Local Plan and the DPDs; they reflect local community interests. Nine NPs are adopted, and four other NPs are in preparation<sup>46</sup>.
- 3.14 The District has a strong local economy, with a skilled population and higher than average levels of productivity and earnings compared with regional and national averages. However, the changing needs of businesses means that some of the District's traditional industrial areas require regeneration, with many of these areas located alongside the Grand Union Canal in Warwick and Royal Leamington Spa.
- 3.15 **Climate Change & Energy:** The preparation of Local Plan was informed by various studies on climate change, low carbon, and renewable energy<sup>47</sup>. Early work established that energy consumption is dominated by heat whereas CO<sub>2</sub> emissions are more balanced between heat and electricity.
- 3.16 Guidance on adaptation to climate change was provided by a study in 2012 including issues for flood protection and dealing with summer heatwaves, high wind/storms, and winter snow/ice. The Warwick Low Carbon Action Plan (2012) identified that from analysis of current and projected energy use in the District shows that by far the biggest opportunity and need is to address energy use in existing buildings and infrastructure.
- 3.17 Guidance for developers is provided by the Air Quality SPD (2019)<sup>48</sup> and this aims to simplify the consideration of air quality impacts associated with development schemes and focus on incorporation of mitigation at design stage, thus countering the cumulative impacts of aggregated developments.

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<sup>44</sup> <https://magic.defra.gov.uk/MagicMap.aspx>

<sup>45</sup> [www.ons.gov/](http://www.ons.gov/)

<sup>46</sup> [https://www.warwickdc.gov.uk/info/20444/neighbourhood\\_plans](https://www.warwickdc.gov.uk/info/20444/neighbourhood_plans)

<sup>47</sup> [https://www.warwickdc.gov.uk/downloads/download/669/climate\\_change\\_low\\_carbon\\_and\\_renewable\\_energy](https://www.warwickdc.gov.uk/downloads/download/669/climate_change_low_carbon_and_renewable_energy)

<sup>48</sup> [https://www.warwickdc.gov.uk/downloads/file/5043/air\\_quality\\_spd](https://www.warwickdc.gov.uk/downloads/file/5043/air_quality_spd)

- 3.18 Government data for 2018<sup>49</sup> indicates that primary energy production rose in 2018, up 2.9 per cent on a year earlier. The rise was driven by growth in output from primary oil, wind, solar and biomass. Overall fossil fuel growth increased, but with coal output falling to a record low level. Total renewables, as measured by the 2009 EU Renewables Directive, accounted for 11.0 per cent of total energy consumption in 2018, up from 9.9 per cent in 2017. Low carbon electricity's share of generation increased from 50.0 per cent to a record 52.6 per cent, driven by the increase in renewables generation.
- 3.19 The studies to inform the emerging Joint South Warwickshire Local Plan have included a detailed Emissions & Carbon Reduction Pathways Report (Anthesis, April 2021). Studies have also included a climate change impact assessment to investigate local plan growth options<sup>50</sup>. Based on 2017 data, in Warwick District 26% of carbon emissions are from residential buildings and 13% from commercial buildings – heating and electricity (from the national grid). 39% of carbon emissions are from on-road transport. Warwick Council commissioned independent specialist support to inform the preparation of the Regulation 19 draft Net Zero Carbon DPD. The Energy & Sustainability Policy Review (2022)<sup>51</sup> has researched how plan policy requirements have been structured and justified in other adopted plans – thus forming a proxy evidence base for their applicability in Warwick.

### **Key Sustainability Issues & Opportunities**

- 3.20 The key issues and opportunities for sustainable development and the Net Zero Carbon DPD may be summarised as follows:
- The Council is committed to become a net-zero carbon organisation by 2025
  - Facilitating decarbonisation by local businesses, other organisations, and residents so that total carbon emissions within Warwick District are as close to zero as possible by 2030
  - Limiting global warming to 1.5°C compared to the predicted 2.0° C would ensure a slower rate of sea level rise, reduced risks to marine life and fisheries and fewer losses of species by reducing impacts on biodiversity and ecosystems
  - Need to consider long-term effects
  - Setting standards and targets that will contribute positively to the new targets set by Government since the Local Plan was adopted
  - Encourage households to reduce their emissions
  - Promote and support more sustainable transport
  - No viable locations for commercial-scale onshore windfarms or fast running watercourses for hydroelectric power
  - Risks to human health and wellbeing from higher temperatures and more extreme weather
  - Flooding and water resources – their wider role in sustainable water management and climate change resilience

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<sup>49</sup> <https://www.gov.uk/government/news/statistical-release-digest-of-uk-energy-statistics-2019>

<sup>50</sup> <https://www.southwarwickshire.org.uk/swlp/technical-evidence.cfm>

<sup>51</sup> Bioregional (January 2022) Warwick Net Zero Carbon DPD Energy & Sustainability Policy Review

- Green infrastructure – making linkages to networks and improvements with biodiversity gains for wildlife and people to protect ecosystems and their multifunctionality
- Risks to historic assets and their settings
- High Speed 2<sup>52</sup>

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<sup>52</sup> <https://www.hs2.org.uk/> (now delayed for 5 years)

## 4.0 SUSTAINABILITY APPRAISAL OF THE WARWICK NET ZERO CARBON DPD

### Developing the NZC DPD from Regulation 18 to Regulation 19

- 4.1 The Regulation 18 draft DPD comprised four objectives and six policies that were subject to SA and the findings presented in the initial SA Report (September 2021). As a result of consultation comments received on the draft DPD and further studies undertaken, the DPD has been refined and it now comprises the four objectives and six policies. Four of the policies (NZC1, NZC2 (A-C)) have been retained and amended with details provided in the Bioregional Report (January 2022)<sup>53</sup>. The policies on zero carbon ready technology and viability have been deleted with relevant information aligned elsewhere within the draft DPD. There are two new Policies that have been developed – NZC3 Net Zero Carbon Embodied Carbon, and NZC4 Net Zero Carbon Existing Buildings.
- 4.2 The SA at the Regulation 19 stage has built upon the SAs of the previous draft policies NZC1, NZC2 (A-C) and updated/reassessed the revised policy wordings. The SA has tested the two new policies NZC3 and NZC4 in a comparable manner to the previous assessment and the findings are presented within this section of the SA Report.
- 4.3 At the Regulation 18 consultation, it was suggested that the SA should test the “do-nothing” and “follow the national approach to improved energy efficiency requirements” as reasonable alternatives. It is agreed that the Council could do nothing, and that it also does have a choice in setting higher energy efficiency standards for new buildings than national requirements set in building regulations. Accordingly, these two alternative scenarios have been tested using the same SA methods.
- 4.4 The national approach to improved energy efficiency is taken to be that set out by the UK Government in Build Back Greener (October 2021) with the intention for Regulations from 2025 through the Future Homes and Buildings Standard<sup>54</sup> to ensure all new homes are ready for net zero by having a high standard of energy efficiency and low carbon heating installed as standard. This provides a roadmap for the housebuilding industry and homeowners to contribute to the net zero target for 2050. The standard will comprise amendments to Part F (ventilation), Part L (fuel & power) and Part O (overheating) of the Building Regulations for new homes. The likely effects of these two alternative scenarios were tested in the same manner and according to the sustainability themes.

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<sup>53</sup> Bioregional for WDC (January 2022) Energy & Sustainability Policy Review

<sup>54</sup> <https://www.gov.uk/government/consultations/the-future-buildings-standard>

## Compatibility of DPD & SA Objectives

- 4.4 The overall aim of the DPD is to focus on minimising carbon emissions from new buildings within the District to support the achievement of national and local carbon reduction targets; it will aim to ensure all new developments should be net zero carbon in operation. For the purposes of this DPD net zero carbon relates to regulated operational energy, which results from fixed building services and fittings (space heating, cooling, hot water, ventilation, and lighting). In achieving this aim, the DPD will ensure that new development does not add to the District's carbon deficit and will therefore ensure that the significant cost of retrofitting buildings to achieve net zero carbon does not increase.
- 4.5 There are four Objectives for the DPD, as follows:
- To provide a clear policy framework to enable developers to understand the requirements for planning proposals to ensure new buildings are planned and constructed to be net zero carbon in operation
  - To ensure practical and viable low carbon building standards that can be applied to new buildings
  - To support the consideration of low carbon energy sources as part of development proposals
  - As a last resort, to provide the policy framework for addressing residual carbon from new buildings through a robust carbon offsetting policy
- 4.6 The sustainability themes with grouped SA Objectives were tested for compatibility with these specific DPD Objectives, using professional judgment and using an approach - + compatible; - not-compatible; 0 not relevant/not applicable. The SA findings are summarised as follows:

**Table 4.1: Compatibility of SA & DPD Objectives**

| DPD Objective<br>/SA Theme               | Policy Framework | Building Standards | Low C Sources | Carbon Offsetting |
|--|------------------|--------------------|---------------|-------------------|
| Economy                                  | +                | +                  | +             | +                 |
| Housing, Communities, Health & Wellbeing | +                | +                  | +             | +                 |
| Access to Services/Facilities            | +                | +                  | +             | +                 |
| Transport                                | +                | +                  | +             | +                 |
| Air Quality & Climate Change             | +                | +                  | +             | +                 |
| Land/Soil Resources                      | +                | +                  | +             | +                 |
| Natural Environment                      | +                | +                  | +             | +                 |
| Historic Environment                     | +                | +                  | +             | +                 |
| Water                                    | +                | +                  | +             | +                 |



- 4.7 The SA found that DPD Objectives were compatible with all the sustainability themes; there were no incompatibilities identified. Potential incompatibility with SA objectives for the economy are mitigated through the inclusion of "practical and viable" in the DPD objective for building standards. Confirmation of commitment and implementation is demonstrated through the inclusion of "robust" offsetting policy to address residual carbon from new buildings. Particularly strong compatibilities were found for SA Objective SA No 4 Reduce Waste; No 5 Land/Soil & Sustainable Construction; SA No 7 High Quality Design; No 9 Good Quality Air; SA No 10 Minimise Causes of Climate Change; SA No 11 Adapt to Impacts of Climate Change – flooding; No 12 Housing; and No 14 Improve Health & Well-being.

### **SA of DPD Policies NZC1, NZC2(A-C), NZC3, NZC4**

#### **Economy:**

SA Objective No 1: Economy

*SEA Directive Topics: Population; Health*

- 4.8 Not addressing climate change will have adverse implications for the economy (and wider issues) of the District area and overall, for the UK. Thus, likely negative effects are indicated for the do-nothing scenario. It is known that extreme weather events such as droughts, fires, heatwaves, and storms are likely to cause economic harm because of their impacts on health and productivity. Predictions and modelling vary but, for example, a recent study by UCL (2021)<sup>55</sup> confirms that it is easier to deal with climate change impacts, and the economic damages from continued warming would greatly outweigh most costs that could be involved in preventing emissions now. The risk of costs being even higher than previously assumed reaffirms the urgency for fast and strong mitigation. The research concludes that choosing to not reduce greenhouse gas emissions is an extremely risky economic strategy. Thus, taking a more proactive approach and seeking to reduce emissions now is more likely to have a positive effect on the economy, including by minimising higher costs in the future.
- 4.9 Following the national approach to improved energy efficiency requirements should reduce energy costs with concomitant positive effects for economic objectives. However, such benefits will be longer-term as the national targets are set for 2035 and 2050, and there is uncertainty about costs for dealing with emissions and climate change effects in the future, although the UCL research advises that it will cost more. Government asserts in Build Back Greener that "in the long run, green products are more efficient and cheaper". Therefore, a minor positive but with uncertainty for this scenario as it is somewhat unclear as to when there will be cheaper energy costs.

<sup>55</sup> <https://www.ucl.ac.uk/news/2021/sep/economic-cost-climate-change-could-be-six-times-higher-previously-thought>

- 4.10 The proposed DPD has understood the concerns about costs of addressing climate change and one of the objectives for the DPD is to ensure “practical and viable low carbon building standards” – thus providing mitigation measures that will help resolve any concerns about potential negative effects/costs of progressing the zero-carbon economy with stronger standards now. Recent studies<sup>56</sup> with a high-level viability assessment for the majority of development types in the majority of locations, undertaken for the Council have confirmed that development viability can accommodate the energy efficiency measures proposed. Viability testing has considered each element of the proposed DPD, and this is explained in the narrative of the DPD text, and the approach of the Council made clear in section 11 Viability.
- 4.11 DPD Policy NZC1 sets the overarching strategy for achieving net zero carbon development and with development viability unlikely to be threatened by the local requirements, positive effects are indicated for the economy by taking a proactive approach now to address emissions sooner and thus reducing higher costs of climate change effects in the longer term. The policy has been redrafted to require demonstration that the energy hierarchy has been applied. It is now explicit to regulated energy usage and carbon emissions, and it sets measurable targets for on-site carbon reductions against Building Regulation Part L – and this reflects the new standard to be introduced in 2025. This enhancement and clarification to the overall strategy strengthens the delivery and thus confirms the likely positive effects on economic objectives.
- 4.12 DPD Policy NZC2(A) Making Buildings Energy Efficient recognises that, in addition to reducing CO<sub>2</sub> emissions, energy efficient homes minimise energy bills and provide healthier environments to live in. This will have positive effects for SA Objective No 1 Economy, as well as No 14 Health and No 15 Reduce Poverty (through reducing fuel poverty) supporting health and wellbeing through the delivery of high-quality homes. The policy now mandates a % improvement on the energy efficiency of the building as step 1 of the energy hierarchy and this contributes significantly to reducing potential costs and emissions required from retrofitting. The policy has been updated to include a development threshold for when the policy applies. These improvements to the policy provide more certainty for delivery and achievement of objectives, indicating major positive effects for economic objectives.
- 4.13 The supporting text provides details about requirements for the methods of assessment including the Standard Assessment Procedure (SAP). This is aligned with the new standard to be introduced in 2025. All developments must demonstrate the extent to which compliance with NZC2(A) is achievable with an energy statement. It is acknowledged that this may not be possible some types of commercial development (hotels and schools) due to their high peak hot water demand. This provides mitigation for such developments on a case-by-case basis to reduce negative effects on SA No 1 Economy.

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<sup>56</sup> BNP Paribas for WDC (February 2022) Net-Zero Carbon Development Plan Document: Revised Viability Study

- 4.14 The supporting text requires that the best use should be made of site orientation, building form, layout, landscaping, and materials to maximise natural light and heat, whilst avoiding internal overheating. This will further support positive effects for economy and health/wellbeing.
- 4.15 DPD Policy NZC2(B) Zero or Low Carbon Energy Sources and Zero Carbon Ready Technology now mandates the incorporation of on-site renewable zero and low carbon sources to achieve the carbon reductions required by Policy NZC1 and achieve on-site net zero operational carbon wherever possible. As with Policy NZC2(A), this improvement to the policy contributes significantly to lowering the energy demand from new buildings and the burden on energy infrastructure – thus confirming delivery and likely positive effects for the economy. The policy recognises that full compliance may not be feasible or viable having regard to the type of development. In this case, the policy now requires consideration of zero carbon ready technologies. Thus, the potential for negative effects on objectives for the economy are mitigated resulting in neutral effects for SA No 1 Economy and No 15 Reduce Poverty. Overall, with the enhanced certainty for reducing energy demand and costs, positive effects are likely for economy and health/wellbeing.
- 4.16 DPD Policy NZC2(C) Carbon Offsetting requires that where a development proposal cannot demonstrate that it is net zero carbon at the point of determination of planning permission, it will be required to address any residual carbon emissions – through a cash in lieu contribution and/or a verified local offsetting scheme. Offsetting should only be used where carbon reductions have been maximised through Policies NZC2(A) & NZC2(B) – it is considered that offsetting is an option of final resort. More information is now provided on the calculation of carbon offsetting and further information on applicability to Coventry & Warwickshire to provide flexibility in delivery. This allows for unusual circumstances where the nature or location of the site may affect viability – thus providing mitigation measures to ensure that there are no significant negative effects on SA Objective No 1 Economy.
- 4.17 DPD Policy NZC3 Embodied Carbon. This new policy requires that new major development should demonstrate how the embodied carbon of the proposed materials to be used in the development has been considered and reduced where possible. This has the potential for further positive effects on net zero carbon objectives wider than Warwick DC and over the longer-term. The supporting text explains that embodied carbon emissions can be as much as 50% of total emissions over the lifetime of a building. The policy applies only to major development (over 50 dwellings and/or 5,000 sqm non-residential) where the additional costs of such assessments are viable – thus mitigating potential negative effects on SA No1 Economy.
- 4.18 DPD Policy NZC4 Existing Buildings recognises that that retrofitting the existing building stock presents a significant opportunity to reduce the District's carbon deficit. The policy recognises that it may not be possible to retrofit existing buildings to the same level of fabric efficiency as required under NZC1 and NZC2(A). It is also necessary to be sensitive to the historic contexts. Thus, the policy provides for mitigation against excessive costs whilst

supporting more sustainable construction. Some minor positive effects are indicated with uncertainty as the extent of retrofitting is uncertain at this time.

- 4.19 Thus, the DPD seeks to support new development by providing updated guidance and by setting out clear requirements. Importantly, Policy NZC1 requires that new development “should achieve net zero operational regulated carbon emissions”; and standards, thresholds and methods of assessment are now explicit such that delivery is more certain to be implemented, confirming the likely positive effects for the economy – particularly in the longer term.

**Housing, Communities, Health & Wellbeing:**

SA Objective No 12 Housing; SA No 13 Access to Services/Facilities; SA 14 Improve Health & Well-being; SA No 15 Reduce Poverty; SA No 16 Reduce Crime

*SEA Directive Topics: Population; Health*

- 4.20 The Do-Nothing scenario that does not address climate change effects will have significant adverse implications for communities, health and wellbeing through extreme weather events that can affect health and wellbeing directly (drought, floods, high temperatures) and through risks to infrastructure security and food provision. Whilst there are policies within the Warwick Local Plan – HS1 Healthy, Safe and Inclusive Communities; CC1-3 Climate Change; and FW1-4 Flooding and Water – these were adopted in 2017 and do not reflect the current national understanding, strategy, and policy on climate change effects, risks, and mitigation measures. Thus, there is the potential for uncertain negative effects until the new SWLP is prepared and adopted.
- 4.21 The national approach for improving energy efficiency in buildings will have positive effects for housing, communities, health, and wellbeing – but in the longer term since the intentions are to progress to net zero carbon by 2050. The standard for future homes and buildings will not be introduced until 2025. Provision of high-quality housing and buildings will contribute to health and well-being bringing benefits by supporting good physical and mental health through creating healthy indoor living environments with healthy air temperatures, humidity levels, noise levels, and improved air quality. This has particular benefit to the health and wellbeing of people with poor health, such as the elderly or disabled, indicating significant positive effects for SA No 12 Housing and SA No 14 Improve Health & Wellbeing.
- 4.22 The proposed DPD requires high standards through Policy NZC1 as all new development should achieve net zero carbon emissions - with major positive effects that will be cumulative in the longer term. By addressing additional factors – zero or low carbon energy sources, offsetting carbon, embodied carbon, and existing buildings – the DPD contributes more than just applying the national approach for improving energy efficiency. It also implements such requirements earlier indicating wider positive effects and that will be delivered sooner. Therefore, major positive effects for SA No 12 Housing and SA No 14 Improve Health & Wellbeing through delivery of high-quality housing

and buildings that provide healthy indoor living environments and contribute to reducing the risks to health from extreme weather conditions through addressing climate change effects proactively.

- 4.23 Policy NZC1 is now explicit to regulated energy usage and carbon emissions, and it sets measurable targets for on-site carbon reductions against Building Regulation Part L. This redrafting improves the policy and better ensures that there will be implementation, thus confirming the likely positive effects on health. Such a stricter policy has the potential to affect the deliverability and viability of new developments, and this could result in a reduction in the rate of housing delivery – with a concomitant reduction in positive effects for health and wellbeing. However, the Council has undertaken a high-level viability impact assessment and section 11 in the DPD explains that the majority of development types in the majority of locations are viable with the net zero carbon requirements.
- 4.24 Delivery of higher energy efficiency standards through Policy NZC2(A) Energy Efficiency will have positive effects on health and wellbeing through the provision of healthy indoor environments. The policy now mandates a % improvement on the energy efficiency of the building as step 1 of the energy hierarchy and this contributes significantly to potential costs and emissions required from retrofitting. The policy has been updated to include a development threshold for when the policy applies. These improvements to the policy provide more certainty for delivery and achievement of objectives – with major positive effects for health and well-being. Policy NZC2(B) and NZC(C) require all new developments to consider low or zero carbon sources of energy – with positive effects that could be synergistic depending upon location and will be cumulative in the longer term.
- 4.25 New Policy NZC3 Embodied Carbon requires new major development (more than 50 dwellings and/or 5,000 sqm non-residential) to demonstrate how the embodied carbon of the proposed materials to be used as been considered and reduced where possible. The DPD recognises that embodied carbon emissions can be as much as 50% of total emissions over the lifetime of a building. This proactive approach will contribute mitigation measures towards addressing climate change effects and their risks to health and wellbeing.
- 4.26 New DPD Policy NZC4 Existing Buildings recognises that that retrofitting the existing building stock presents a significant opportunity to reduce the District's carbon deficit. By supporting sensitive and appropriate retrofitting of energy efficiency measures and micro-renewables, carbon emissions may be further reduced with positive effects for health and wellbeing.
- 4.27 SA Objective Nos 13 & 16 are not directly relevant to the DPD and therefore with neutral effects indicated. The potential negative effects associated with fuel poverty are recognised by the DPD and Policy NZC2(B) allows for the possibility of renewable or low carbon energy sources to be unviable – in terms of cost of installation or resulting in running costs that could result in fuel poverty. Thus, potential negative effects for SA No 15 are mitigated. Overall, the provision of mitigation measures for climate change predicted effects through the updated guidance and more explicit requirements in the DPD

confirms major positive effects for housing, communities, and health and wellbeing, particularly in the longer term.

**Transport:**

SA Objective SA No 2 Sustainable Transport; SA No 3 Reduce Need to Travel

*SEA Directive Topics: Material assets; Population*

- 4.28 Transport is the largest single contributor to carbon emissions in the Warwick district area (39%). With government targets for zero carbon emissions, the introduction of electric vehicles at a much higher proportion is a necessary part in meeting those targets. The Council has already adopted standards within the Parking Standards and Air Quality SPDs<sup>57</sup>. The updating of policies in the DPD has focused on delivering zero carbon emissions from new development and, as such, the effects on transport objectives are not applicable – overall, neutral effects for all three scenarios.

**Air Quality & Climate Change:**

SA Objective No 9 Good Quality Air; SA No 10 Minimise Causes of Climate Change

*SEA Directive Topics: Air, Climate Change*

- 4.29 The major threat to air pollution is from traffic emissions<sup>58</sup>. Warwick District Council has designated five air quality management areas (AQMA) due to elevated annual average concentrations of nitrogen dioxide (NO<sub>2</sub>). The AQMAs include Warwick Town Centre, Coventry Road (Warwick), Leamington Spa and two AQMAs in Kenilworth. Guidance on air quality, transport-related emissions and planning is provided through the Air Quality SPD (January 2019)<sup>59</sup> that includes information and suggests mitigation measures. This Net Zero Carbon DPD does not in itself address transport-related carbon emissions and therefore, effects are neutral/not applicable with regard to SA Objective No 9.
- 4.30 The Do-Nothing scenario that does not address climate change effects will have adverse effects on objectives for climate change. Whilst there are relevant policies within the Warwick Local Plan, these were adopted in 2017 and do not reflect the current national understanding, strategy, and policy on climate change effects, risks, and mitigation measures. Thus, there is the potential for uncertain negative effects until the new SWLP is prepared and adopted.

<sup>57</sup> [https://www.warwickdc.gov.uk/info/20794/supplementary\\_planning\\_documents\\_and\\_other\\_guidance](https://www.warwickdc.gov.uk/info/20794/supplementary_planning_documents_and_other_guidance)

<sup>58</sup> <https://uk-air.defra.gov.uk/air-pollution/causes>

<sup>59</sup> [https://www.warwickdc.gov.uk/downloads/file/5043/air\\_quality\\_spd](https://www.warwickdc.gov.uk/downloads/file/5043/air_quality_spd)



- 4.31 The national approach for improving energy efficiency in buildings will have positive effects for SA No 10 on climate change – but in the longer term since the intentions are to progress to net zero carbon by 2050. Whilst the UK Government's roadmap to net zero carbon as far as possible by 2050 is set out in Build Back Greener, some studies indicate that this is "too little too late". For example, the Climate Crisis Advisory Group in August 2021<sup>60</sup> reiterated the warning that net zero targets are no longer adequate to avoid large-scale disaster since they will not achieve the long-term temperature goals identified in the Paris Agreement to limit global warming to 15°C by the end of the century. The CCAG advise that net negative rather than net zero strategies are required. Therefore, some uncertainty about the significance of positive effects overall for climate change.
- 4.32 Overall, the proposed DPD Policies NZC1, NZC2(A-C), NZC3 & NZC4 with their focus on achieving the Council's targets for decarbonisation will have major positive effects on SA Objective No 10. The overarching strategy set by Policy NZC1 requires that new development should achieve net zero carbon emissions. Implementation is more certain now that the redrafted policy sets the thresholds and measurable targets for on-site carbon reductions against the emerging new standard – and will require compliance ahead of national requirement with benefits accruing earlier. The policy is now explicit to regulated energy usage and carbon emissions stemming from them.
- 4.33 Policy NZC2(A) aims to reduce energy demands by making buildings more energy efficient, and thus reducing carbon emissions. The policy now mandates a % improvement on the energy efficiency of the building as step 1 of the energy hierarchy. Implementation is ensured through measurement of energy performance and emissions, in accordance with the metrics set out in the Government's response to the Future Homes Standard (2021). This contributes significantly to potential costs and emissions required from retrofitting, thus confirming major positive effects for SA Objective No 10. Supporting text explains the need to make best use of site orientation, building form, layout, landscaping, and materials to maximise natural light and heat whilst avoiding internal overheating. This provides clear mitigation measures for the predicted changes in temperature and more extreme weather, further supporting positive effects.
- 4.34 Policy NZC2(B) now mandates the incorporation of on-site renewable zero and low carbon sources to achieve the carbon reductions required by Policy NZC1. Again, this contributes significantly to lowering the energy demand from new buildings and the burden on energy infrastructure. The policy now includes the consideration of zero carbon ready technologies where provision of zero or low carbon energy sources is not feasible or viable. Major positive effects indicated for SA No 10 climate change.
- 4.35 Policy NZC2(B) requires all new development proposals to include an energy statement which demonstrates that renewable, zero and low carbon sources

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<sup>60</sup> <https://www.ccag.earth/newsroom/net-zero-by-2050-is-too-little-too-late-world-leading-scientists-urge-global-leaders-to-focus-on-net-negative-strategies>

of energy have been provided onsite to achieve the carbon reductions required by NZC1 and achieve on-site net zero operational carbon wherever possible. The policy recognises that full compliance may not be feasible or viable and allows for zero-carbon ready technologies to be incorporated. This further confirms that requirements will be implemented with positive effects. The Council expects that energy sources avoid fossil fuels in their entirety – this accelerates the delivery of the national ambition.

- 4.36 Carbon offsetting is set out in Policy NZC2(C) and should only be used where carbon reductions have been maximised through Policies NZC2(A) & NZC2(B) – it is considered that offsetting is an option of final resort and at the bottom of the energy hierarchy. The policy sets out how the amount of carbon to be offset will be calculated, and to reflect emissions over a period of 30 years from completion. Funds raised will be ringfenced towards achieving carbon savings and monitored through the Authority's Monitoring Report. Thus, policies enable development to progress in exceptional circumstances but ensure that net zero carbon targets and standards will still be progressed.
- 4.37 New Policy NZC3 Embodied Carbon requires new major development (more than 50 dwellings and/or 5,000 sqm non-residential) to demonstrate how the embodied carbon of the proposed materials to be used as been considered and reduced where possible. The DPD recognises that embodied carbon emissions can be as much as 50% of total emissions over the lifetime of a building. This proactive approach will contribute positive effects towards SA No 10 climate change.
- 4.38 New DPD Policy NZC4 Existing Buildings recognises that that retrofitting the existing building stock presents a significant opportunity to reduce the District's carbon deficit. By supporting sensitive and appropriate retrofitting of energy efficiency measures and micro-renewables, carbon emissions may be further reduced with positive effects.
- 4.39 Therefore, overall likely major positive effects for SA No 10 climate change that will be cumulative in the longer-term for all the policies of the proposed DPD.

**Waste, Land & Soil Resources:**

SA Objective No 4 Reduce Waste; SA No 5 Land/Soil & Sustainable Construction;  
SA No 9 Good Quality Soils

*SEA Directive Topics: soil*

- 4.40 SA Objective Nos 4, 5 and 9 are not directly relevant to this DPD so neutral effects.

**Natural Environment:**

SA Objective SA No 6(a) Biodiversity; SA No 6(b) Landscape; SA No 7 High Quality Design

*SEA Directive Topics: Biodiversity, flora, fauna; landscape*

- 4.41 The importance of addressing climate change to reduce the predicted adverse effects on ecosystems and biodiversity is well documented. Biodiversity is affected itself by climate change, with negative consequences also for human wellbeing; however, biodiversity - through the ecosystem services it supports - also makes an important contribution to both climate change mitigation and adaptation<sup>61</sup>.
- 4.42 The Do-Nothing scenario that does not address climate change effects will have adverse effects on objectives for climate change and the natural environment. Other policies in the Warwick Local Plan protect and seek to enhance biodiversity and landscape – NE1, NE2, NE3 and NE4 – and also CC1 Climate Change is linked with NE1 requiring development to consider the inter-relationships. However, over time, if updated mitigation measures are not put in place, there is a risk of negative effects on the natural environment with uncertainty for their significance – until the preparation and adoption of the new SWLP.
- 4.43 The national approach for improving energy efficiency in buildings will have positive effects for SA No 10 on climate change – and thus the natural environment - but in the longer term since the intentions are to progress to net zero carbon by 2050 and therefore, some uncertainty about the significance of positive effects overall for climate change.
- 4.44 The new policy NZC3 Embodied Carbon recognises that embodied carbon emissions can be as much as 50% of total emissions over the lifetime of a building. New DPD Policy NZC4 Existing Buildings recognises that that retrofitting the existing building stock presents a significant opportunity to reduce the District's carbon deficit. This proactive approach will contribute positive effects towards climate change and thus the natural environment.
- 4.45 Overall, the proposed DPD Policies NZC1, NZC(A-C), NZC3 & NZC4 with their focus on achieving the Council's targets for decarbonisation will have positive effects on the natural environment by reducing the negative effects from climate change by progressing towards net zero carbon development - and this will be cumulative and synergistic in the longer term for biodiversity and ecosystems. The specific requirements for passive and low energy design and technology as explained in the text supporting Policy NZC2(A) will contribute towards positive effects for SA No 7. The requirement in Policy NZC2(B) to consider low carbon/renewable energy sources within the specific

<sup>61</sup> Convention on Biological Diversity <https://www.cbd.int/climate> also, for example, <https://naturalengland.blog.gov.uk/2020/06/22/climate-change-biodiversity-and-nature-based-solutions/>

local context of each development will further support Local Plan policies for biodiversity and green infrastructure.

- 4.46 Since the adoption of the WDLP in 2017, there has been considerable progression with environmental planning including the updating of the NPPF (2021)<sup>62</sup> with its requirement for “securing measurable net gains for biodiversity” (para 179(b)), and the implementation of the Environment Act (2021)<sup>63</sup> with clear statutory targets for recovery of the natural environment in four priority areas – air quality, biodiversity, water, and waste – as well as a new target to reverse the declining species abundance by the end of 2030.
- 4.47 The adopted Policy NE1 requires protection, enhancement and restoration of green infrastructure and it also considers different spatial scales. Whilst the supporting text discusses links between green infrastructure, flooding, and human health, it does not explicitly refer to nature recovery and climate change. WDLP Policy NE3 Biodiversity requires “no net loss” and “where possible a net gain”. The proposed NZC DPD makes reference to the Environment Bill (as it was prepared before the enactment in November 2021) and thus mentions biodiversity in the section 2 on the national context. Clearly, the new SWLP will address these matters and all development proposals need to comply with national planning policy requirements.

**Historic Environment:**

SA Objective No 8: Historic Environment

*SEA Directive Topics: Historic environment*

- 4.48 The Do-Nothing scenario that does not address climate change effects will have adverse effects on objectives for climate change and potential risks for the historic environment. The Warwick District is rich in historic assets and there are policies in the adopted Warwick Local Plan that protect the historic environment and its settings – HE1-HE4. However, without an updated and proactive approach to mitigating climate change effects on the historic environment, opportunities to retain and reuse buildings may not be optimised. Therefore, potential for some minor negative effects but uncertainty for the significance.
- 4.49 The national approach for improving energy efficiency in buildings will have positive effects for SA No 10 on climate change – and thus the historic environment - but in the longer term since the intentions are to progress to net zero carbon by 2050. Therefore, some uncertainty about the significance of positive effects overall for climate change and the effects on the historic environment.

<sup>62</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

<sup>63</sup> <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

- 4.50 The pressures for new development and the issues associated with climate change effects may threaten the high-quality built environment in the district, especially in the historic areas. Other policies in the Warwick Local Plan protect the historic environment and its settings – HE1-HE4. However, the Local Plan was adopted in 2017 - research, climate change modelling, strategies, and policies have progressed considerably since that time. The progression of Net Zero Carbon DPD enables opportunities for updating guidance for development. The proposed DPD covers wider issues than just energy efficiency in buildings and thus has the potential for further positive effects on climate change (and thus further mitigating risks on the historic environment) than the national approach scenario.
- 4.51 Historic England (HE) advised (letter 28 May 2021) that heritage assets can be a valuable aid to achieving sustainable development, particularly with regard to the retention and re-use of buildings. Historic buildings represent a significant investment of expended energy and HE suggested that the DPD should consider existing buildings as well as new development. Thus, the NZC DPD now includes a new policy NZC4 Existing Buildings that supports development proposals that would result in considerable improvements to energy efficiency, carbon emissions and/or general suitability, condition and longevity. The policy includes specific guidance relating to the historic environment, requiring sensitive retrofitting of energy efficiency measures, appropriate use of micro-renewables, and reinforcement of the protection required in conservation areas. This updates policy guidance and provides additional mitigation measures to protect the historic environment indicating that there will be no significant negative effects for SA No 8.

**Water:**

SA Objective SA No 11 Adapt to Impacts of climate change – flooding; SA No 9 Good Quality Water

*SEA Directive Topics: Water; Climate Change*

- 4.52 The concern that flooding events will increase because of climate change is well documented<sup>64</sup>. Local Plan Policies FW1 Reducing Flood Risk and FW2 Sustainable Drainage provide strong clear guidance to ensure that there will be no increase in flood risk and that sustainable water management will be encouraged with requirements for incorporation of sustainable drainage systems (SuDS) that provide biodiversity, water quality and amenity benefits. Policy FW1 includes requirements with regard to climate change to ensure new development is safe. It may be noted that since the WDLP was adopted, the Government has updated its guidance<sup>65</sup> on climate change allowances to be used in flood risk assessments.
- 4.53 Overall, there is strong mitigation provided through national and Local Plan policy for the water environment, flood risk, and climate change to ensure no

<sup>64</sup> For example, <https://deframedia.blog.gov.uk/2019/08/29/climate-change-linked-to-increased-risk-of-flooding-in-uk/>

<sup>65</sup> <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

negative effects on the water environment from new development. This applies to all three scenarios. Policies in the DPD, particularly NZC1, NZC2 (A& B) will contribute to reducing the negative effects from flood risk through seeking to progress net zero carbon development with overall positive effects for the water environment, particularly in the longer-term.

### Inter-Relationships & Cumulative Effects

- 4.54 As this is a topic specific DPD, focused on seeking to progress net zero carbon in development proposals, most of the effects are inter-related. Significant interrelationships are indicated between SA objectives for the economy, health & wellbeing, climate change, and the natural environment. As the policies are implemented, over the longer term, the positive effects identified will be cumulative. There were no significant negative effects found.

### Summary of SA Findings

- 4.55 The summary findings of the SA are shown by symbols in the table, as follows:

**Table 4.2: SA Summary Findings – Do Nothing; National Approach; NZC DPD Policies**

| SA Theme<br><br>Scenario<br>DPD Policies            | Economy | Housing & Health | Access | Transport | AQ & C Change | Waste Land & Soils | Natural Env | Historic Env | Water |
|---|---------|------------------|--------|-----------|---------------|--------------------|-------------|--------------|-------|
| <b>Do Nothing Scenario</b>                          |         |                  |        |           |               |                    |             |              |       |
| Do Nothing  | -       | -?               | 0      | 0         | -?            | 0                  | -?          | -?           | +     |
| <b>National Approach Energy Efficiency Scenario</b> |         |                  |        |           |               |                    |             |              |       |
| National Approach                                   | +?      | +                | 0      | 0         | +?            | 0                  | +?          | +?           | +     |
| <b>Proposed NZC DPD</b>                             |         |                  |        |           |               |                    |             |              |       |
| Proposed DPD Overall:                               | +       | ++               | 0      | 0         | ++            | 0                  | +           | 0            | +     |
| NZC1 Achieving Net Zero Carbon Development          | +       | ++               | 0      | 0         | ++            | 0                  | +           | 0            | +     |
| NZC2 (A) Making Buildings Energy Efficient          | ++      | ++               | 0      | 0         | ++            | 0                  | +           | 0            | +     |
| NZC2(B) Zero or Low Carbon Energy Sources           | ++      | ++               | 0      | 0         | ++            | 0                  | +           | 0            | +     |
| NZC2(C) Offsetting Residual Carbon                  | +       | +                | 0      | 0         | +             | 0                  | 0           | 0            | 0     |
| NZC3 Embodied Carbon                                | +?      | +                | 0      | 0         | +             | 0                  | +           | 0            | 0     |
| NZC4 Existing Buildings                             | +?      | +                | 0      | 0         | +             | 0                  | +           | 0            | 0     |



- 4.56 The **Do-Nothing Scenario** indicates that development proposals should comply with national and local planning policy. Whilst there are relevant policies within the Warwick Local Plan including HS1 Healthy, Safe and Inclusive Communities; CC1-3 Climate Change; BE1 Layout and Design; N1 Green Infrastructure, and FW1-4 Flooding and Water. These were adopted in 2017 and do not reflect the Council's Climate Emergency and associated targets.
- 4.57 Doing nothing means that the Council's Climate Emergency aim is not being progressed through the development planning process until the new SWLP is prepared and adopted. It may be noted that initial studies for the new plan include comprehensive investigation into the carbon emissions characteristic of the South Warwickshire area and the most effective interventions in order to inform plan-making. Doing nothing does not progress the objectives of the climate change emergency declared by the Council and including the commitments to become a net zero carbon organisation by 2025 and to facilitate others so that total carbon emissions within Warwick District are as close to zero as possible by 2030.
- 4.58 The SA found potential minor negative effects for sustainability themes Economy, Housing & Health, AQ & Climate Change, Natural Environment, and Historic Environment – but with uncertainties as to the extent of the significance of such effects. Compared to the other two scenarios, the do-nothing approach is not proactive and not progressing the commitments made by the Council in its climate change emergency declaration. There were neutral or not applicable effects for the themes of Access, Transport, and Waste/Land/Soils – the same as with the other two scenarios. Positive effects were indicated for the theme of Water - the same as with the other two scenarios – reflecting the strong national and local policies on water.
- 4.59 The **National Approach Scenario** for improving energy efficiency in buildings will have positive effects for housing, communities, health, and wellbeing – but in the longer term since the intentions are to progress to net zero carbon by 2050. The standard for future homes and buildings will not be introduced until 2025. The SA also found positive effects for the themes on Economy, Air Quality & Climate Change, the Natural Environment, and the Historic Environment, but with some uncertainty about the significance of positive effects. This is due to the current debate over net zero and net negative strategies and the timescale being longer than that proposed by the NZC DPD scenario.
- 4.60 Whilst the UK Government's roadmap to net zero carbon as far as possible by 2050 is set out in Build Back Greener, some studies indicate that this is “too little too late”. For example, the CCAG (August 2021)<sup>66</sup> reiterated the warning that net zero targets are no longer adequate to avoid large-scale disaster since they will not achieve the long-term temperature goals identified in the Paris Agreement to limit global warming to 1.5°C by the end of the century. The CCAG advise that net negative rather than net zero strategies are

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<sup>66</sup> <https://www.ccag.earth/newsroom/net-zero-by-2050-is-too-little-too-late-world-leading-scientists-urge-global-leaders-to-focus-on-net-negative-strategies>



required. Warwick DC has noted global concerns and debate about predictions and taken the decision to declare a climate change emergency.

- 4.61 The **Proposed Net Zero Carbon DPD Scenario** found major positive effects for the sustainability themes of housing, communities, health, and wellbeing – and air quality and climate change. By addressing additional factors – zero or low carbon energy sources, offsetting carbon, and existing buildings – the DPD contributes more than just applying the national approach for improving energy efficiency. It also implements such requirements earlier by aiming to achieve net zero carbon as close as possible to 2030 (rather than 2050) indicating wider and more positive effects. The Council expects that energy sources avoid fossil fuels in their entirety – this accelerates the delivery of the national ambition.
- 4.62 Thus, the Council is dealing with carbon emissions now - seeking to provide healthy indoor living environments and contribute to reducing the risks to health from extreme weather conditions through addressing climate change effects proactively. Such an approach may also reduce the costs of dealing with climate change later and in the longer term.
- 4.63 The SA found minor positive effects for SA objectives on the economy, the natural environment, and the historic environment. These findings are similar to those for the National Approach Scenario but without the uncertainty as the policies will be implemented as soon as possible and aim for an earlier date 2030 than the national approach for 2050.
- 4.64 DPD Policy NZC1 sets the overarching strategy for achieving net zero carbon development with major positive effects indicated by taking a proactive approach now to address emissions sooner than the national approach. The policy has been redrafted to require demonstration that the energy hierarchy has been applied. It is now explicit to regulated energy usage and carbon emissions, and it sets measurable targets for on-site carbon reductions against Building Regulation Part L. This reflects the future standard to be applied from 2025 – and makes it easier to implement and monitor – therefore confirming likely positive effects.
- 4.65 Such a stricter policy has the potential to affect the deliverability and viability of development proposals, and this could result in a reduction in the rate of housing delivery – with a concomitant reduction in positive effects for health and wellbeing. However, the Council has undertaken a high-level viability impact assessment and development viability is unlikely to be threatened by the local requirements.
- 4.66 **Reasons for Progressing the Proposed NZC DPD:** The main reason for progressing the NZC DPD rather than the Do-Nothing or the National Approach to Improving Energy Efficiency is that the strategy set out in the DPD progresses the Council's climate change commitments. The other two scenarios do not progress the Council's commitments for becoming a net zero carbon organisation by 2025 and facilitating the total carbon emissions within Warwick District as close to zero as possible by 2030. There is some

evidence to suggest that taking such a proactive approach now will reduce the costs of dealing with climate change later.

- 4.67 The Do-Nothing scenario will progress towards net zero carbon for 2050 with positive effects but some uncertainties of significance. The National Approach will not implement stricter standards on energy efficiency in buildings until 2025. The NZC DPD addresses additional factors - zero or low carbon energy sources, offsetting carbon, and existing buildings – such that it will contribute more reduction in carbon emissions.

### **Habitats Regulations Assessment (HRA)**

- 4.68 The HRA screening (2014)<sup>67</sup> undertaken of the developing Local Plan concluded that there would be no likely significant effects (LSEs) associated with changes in air quality, water quality and levels, recreational disturbance or habitat loss/fragmentation on Ensor's Pool SAC. The SAC is somewhat isolated as an abandoned claypit and designated for the presence of the white-clawed crayfish such that it was unlikely that the new development proposed in the Local Plan would have any impacts. The pool is clay-lined and not connected to other waterbodies/watercourses; it is replenished through rainfall.
- 4.69 The HRA screening at that time also noted that the need for supplying water from Wales to growing Midland conurbations could have a potential impact on hydrologically dependant Welsh SACs. At that time, Severn Trent Water advised that water resources in the Warwick District area would continue to be sourced locally and therefore, the HRA screening concluded that this would not be a potential issue for the Warwick Local Plan.
- 4.70 The Warwickshire River Avon drains into the Severn Estuary to the south-east and this is designated as a SPA, SAC & Ramsar. The canals are supplied through surfacewater and groundwater sources and therefore, there is the potential for environmental pathways through the water networks. It is considered very unlikely that any development activities arising from the Net Zero Carbon DPD would have significant effects on designated sites.
- 4.72 The Warwick District area is some 75 km distance<sup>68</sup> from the Severn Estuary such that it is considered very unlikely that there is any relevant functionally linked land. It is understood that there is some concern about increased recreational use arising from new development in Gloucestershire and potential impacts on functionally linked habitats used by certain bird species associated with the Severn Estuary SPA/SAC/Ramsar. However, it is considered that the Warwick area is too distant, and the Net Zero Carbon DPD does not propose any additional new development such that there would be no LSEs in this respect.

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<sup>67</sup> [https://www.warwickdc.gov.uk/downloads/file/2425/b02 - habitat\\_regulations\\_assessment - screening\\_report - march\\_2014](https://www.warwickdc.gov.uk/downloads/file/2425/b02 - habitat_regulations_assessment - screening_report - march_2014)

<sup>68</sup> Measured directly from the centre of the area to the nearest designated point of the Severn Estuary using Defra Magic Mapping <https://magic.defra.gov.uk/MagicMap.aspx>

- 4.73 However, it is appreciated that the HRA screening for the Warwick Local Plan was prepared before certain recent CJEU's (2017-2018)<sup>69</sup> were issued with significant implications for the HRA methods used in the UK. Competent authorities cannot take account of any integrated or additional avoidance or reduction measures when considering at the HRA screening stage whether a plan is likely to have an adverse effect on a European Site. The HRA screening (2014) for the Local Plan reached its conclusions taking into account embedded policy mitigation such as environmental criteria in policies that have to be met.
- 4.74 Therefore, in consideration of the increased awareness and requirements for sustainable water management and building resilience to climate change; the fundamental change to the UK method of undertaking HRA screening/ appropriate assessment with recent updated Government guidance (July 2019)<sup>70</sup> that takes into account the implications of the CJEU's; increased understanding of potential disturbance on SPA/SAC/Ramsar sites, particularly the Severn Estuary; and since the Net Zero Carbon DPD is focused on the air and water environments – the HRA screening with regard to air quality and water levels was updated.
- 4.75 A pragmatic and proportional approach was taken and to clearly demonstrate due process in line with the updated guidance. Since the DPD is focused on air and water systems, there could be the potential for environmental pathways. The Warwick Local Plan does include relevant policy mitigation and this HRA essentially clarifies this through the updated methodology - thus making the process and conclusions explicit with regard to the updated requirements. This precautionary approach is being taken in particular consideration of the significant changes to the HRA process in the UK since the screening undertaken for the Local Plan.
- 4.76 As a result of a High Court Judgment in 2017, Natural England developed internal guidance<sup>71</sup> and advises that usually only those European sites present within 200m of the edge of a road on which a plan or project will generate traffic will need to be considered when checking for LSEs from road traffic emissions with regard to HRAs. The Net Zero Carbon DPD does not propose any new development that is not already accounted for within the adopted Local Plan, and therefore, there are no LSEs associated with air quality and road traffic emissions.
- 4.77 The primary reason for designation of habitats in the Severn Estuary SAC<sup>72</sup> is for its estuaries, mudflats, sandflats and Atlantic salt meadows; also, for species of lamprey and the Twaite shad. The Severn Estuary SPA<sup>73</sup> supports internationally important assemblages of overwintering birds with conservation objectives for Bewick's Swan, Gadwall, White-fronted Goose

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<sup>69</sup> For example, please see *People over Wind & Sweetman v Coillte Teoranta* Case C-323/17

<sup>70</sup> <https://www.gov.uk/guidance/appropriate-assessment>

<sup>71</sup> NE Internal Guidance – Approach to advising competent authorities on Road Traffic Emissions and HRAs (June 2018) <http://publications.naturalengland.org.uk/publication/4720542048845824>

<sup>72</sup> <https://sac.jncc.gov.uk/site/UK0013030>

<sup>73</sup> <http://archive.jncc.gov.uk/pdf/SPA/UK9015022.pdf>

Dunlin, Shelduck and Redshank. The Ramsar<sup>74</sup> designation relates to the importance of the estuary and river for migratory fish (salmon, trout, lamprey, shad and especially eel) and the particular importance for birds during spring and autumn.

- 4.78 HRA screening indicates that there is the potential for an environmental pathway through the linkages between the water networks of river, canal and groundwater with the River Severn catchment area<sup>75</sup> covering the Warwick District area. Whilst the Net Zero Carbon DPD does not propose new development, it would support micro-renewable energy generation (for example, see Policy NZC4). Thus, there could be the potential for likely significant effects on the designated site – its functionally linked water and/or land since migratory birds may extend some distance upstream on the River Severn.
- 4.79 Therefore, if this aspect is taken to the second stage of the HRA process – appropriate assessment – the embedded policy mitigation measures may be taken into consideration. Local Plan Policy FW4 Water Supply requires developers to ensure that there is an adequate water supply having regard to the Severn Trent Water's WRMP; it also recognises the ecological status of water and requires that development must not affect objectives as set out in the River Severn RBMP. LP Policy NE5 Protection of Natural Resources requires that new development should not give rise to water pollution where the level of discharge, emissions or contamination could cause harm to sensitive receptors; does not result in a reduction in the quality or quantity of groundwater resources. LP Policy NE1 Green Infrastructure and NE2 Protecting Designated Biodiversity provide further embedded mitigation measures through policy requirements.
- 4.80 Therefore, it was concluded that the Warwick Net Zero Carbon DPD will not have adverse effects, alone or in combination with other plans and projects, on the integrity of the internationally designated site Severn Estuary SPA/SAC/Ramsar. Natural England has advised of studies relating to functionally linked watercourses and migratory fish in respect of the Severn Estuary SAC/Ramsar, and to risks in respect of functionally linked land and wild birds of the Severn Estuary SPA. These studies and any other emerging evidence will be taken into account in developing the new SWLP and its accompanying HRA.

### **SA of Implementing the Warwick Net Zero Carbon DPD**

- 4.81 Overall, the Net Zero Carbon DPD is likely to have major positive effects for Sustainable Development objectives on air quality and climate change, and housing and health. Minor positive effects were indicated for the economy, the natural environment, and the water environment. These positive effects are inter-related and likely to be cumulative, particularly in the longer term. There were no significant negative effects identified. The DPD clearly helps to resolve an existing key sustainability problem for contributing towards

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<sup>74</sup> <http://archive.jncc.gov.uk/pdf/RIS/UK11081.pdf>

<sup>75</sup> <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/9>

addressing climate change. The DPD provides an updating of the WDLP that was adopted in 2017 and ahead of the preparation and adoption of the new South Warwickshire Local Plan. This is in recognition of the recent national updating of planning, climate change, and environmental strategies and policy.

- 4.82 The DPD has recognised where there could be certain negative effects arising from requirements to achieve zero carbon and ensured that there are adequate mitigation measures to support and/or strengthen the policies. Such a stricter policy has the potential to affect the deliverability and viability of development proposals, and this could result in a reduction in the rate of housing delivery – with a concomitant reduction in positive effects for housing, health, and wellbeing. However, the Council has undertaken a high-level viability impact assessment and development viability is unlikely to be threatened by the local requirements. Policy NZC2(B) recognises that renewable or low carbon options could be unviable or not feasible in some situations and makes provision for such a situation – but only in exceptional circumstances. The explicit requirements set out in Policy NZC1 illustrate a clear commitment to implementation and thus ensuring more certainty of the predicted positive effects.
- 4.83 Overall, implementation of the Net Zero Carbon DPD updates planning and environmental requirements and proactively progresses the aim and objectives for Warwick District Council to become net zero by 2025 and to facilitate total carbon emissions within the District as close to zero as possible by 2030.

### **Equality Impact Assessment (EqIA)**

- 4.84 A proportionate and relevant approach was taken to the EqIA, and details are presented in Appendix II of this SA Report. Overall, the NZC DPD will enhance the local environment, reducing risks associated with the effects of climate change, and thus with improvements in wellbeing for all people. Further positive effects may be indicated for the Age and Disability Groups since these include people with vulnerabilities. The potential for the NZC DPD policies impacting the viability and delivery of development in some circumstances has been mitigated within the policies. Negative effects from not meeting house needs, with concomitant potential negative effects for all groups and especially the Age and Disability groups, are therefore unlikely.
- 4.85 The EqIA has found that the DPD is unlikely to result in negative equality impacts that would require justification or mitigation. No options have been missed to promote equality of opportunities and thus further details do not need to be provided of action that could be taken to remedy this. Therefore, no further EqIA is required and the PSED has been met.

## 5.0 MONITORING

- 5.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>76</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Warwick District Council Monitoring Report (produced annually)<sup>77</sup> is considered sufficient to ensure appropriate monitoring takes place.

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<sup>76</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>77</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)

## 6.0 CONCLUSIONS, CONSULTATION & NEXT STEPS

- 6.1 The SA has been undertaken according to good practice and in line with Government requirements and guidance. It is aligned with the SA of the adopted Local Plan, following the same methods and approach, and is proportionate - acknowledging the hierarchy of plan-making and the tiering of assessment processes.
- 6.2 The SA investigated three scenarios – the Do-Nothing; the National Approach to Improving Energy Efficiency; and the proposed NZC DPD with policies on energy efficiency, energy sources, offsetting carbon, embodied carbon, and existing buildings. More certain positive effects were found for the DPD scenario compared with the other two scenarios. The Council decided to progress the DPD as it better progresses the commitments made in its climate change emergency declaration.
- 6.3 Overall, the SA has found that the implementation of the Warwick Net Zero Carbon DPD will have positive effects. Mitigation measures for any potential negative effects on the natural and historic environments are provided through policies in the DPD and the Local Plan.
- 6.4 Potential negative effects on the economy have been mitigated through consideration of exceptional circumstances. Potential risks to development viability have been investigated through a high-level assessment that has demonstrated that the majority of development types in the majority of locations are viable. Thus, implementation of the NZC DPD with its stricter policy requirements for carbon emissions will not result in any significant negative effects.
- 6.5 A pragmatic and proportionate HRA screening and appropriate assessment was undertaken to demonstrate that the HRA had been considered in line with recent changes to Government guidance. Whilst unlikely, there is the potential for environmental pathways through the canal and river systems for adverse effects on the internationally protected Severn Estuary and linked land and water. It was demonstrated that there is embedded mitigation through Local Plan Policies such that there will be no significant effects on the designated Severn Estuary, alone or in-combination with other plans and projects.
- 6.6 The Net Zero Carbon DPD updates and adds to existing Local Plan Policies associated with building standards and other sustainability requirements, planning for climate change adaptation, planning for renewable energy and low carbon generation, and assessing viability including carbon offsetting. It is focused on the role that the land use planning system can have to progress the commitments made by the Council when adopting its Climate Change Action Programme in 2020. Major positive effects are indicated for SA objectives on air quality and climate change, particularly in the longer term.



6.7 This document reports the SA and HRA processes for the Warwick Net Zero Carbon DPD and is submitted alongside the Draft DPD for the Regulation 19 formal and public consultation. The draft DPD and supporting evidence including this SA report any consultation comments, will be submitted to the Secretary of State for independent examination by a Planning Inspector.

6. Any comments on this SA Report should be sent to:

[planningpolicy@warwickdc.go.uk](mailto:planningpolicy@warwickdc.go.uk)

## APPENDICES

### I Statement of Compliance with the SEA Directive & Regulations

## Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004). This is Appendix 1 of the Environmental Report as required by the SEA Directive and the UK SEA Regulations. This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the SA Report (February 2022) - and in accordance with paragraph 32 of the National Planning Policy Framework (updated 2021).

| SEA Directive & Regulation Requirements   | SEA Report Section   | Summary of Contents   |
|---|--|---|
| <i>An outline of the contents, main objectives of the plan and relationship with other relevant plans</i>   | Section 1<br>Introduction                                  | Sets out the contents and purpose of the Net Zero Carbon DPD  |
|   | Section 3<br>Context & Baseline                            | Outlines context, baseline & including the relationship with other relevant plans; also signposts links with the WDC Local Plan & SA/SEA Scoping (2014)   |
| <i>The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan</i>   | Section 3<br>Context & Baseline                            | Summarises the relevant baseline conditions for environmental and sustainability aspects in the WDC area, and likely evolution without the DPD  |
| <i>The environmental characteristics of the area likely to be affected</i>  | Section 3<br>Context & Baseline                            | Summarised in Section 3 of SA Report  |
| <i>Any existing environmental problems which are relevant to the plan including, in particular, those in relation to any areas of a particular environmental importance</i>   | Section 3<br>Context & Baseline                            | Summarises existing environmental and sustainability issues/problems for the WDC area   |
| <i>The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation</i>   | Section 2<br>SA Methods<br>Section 3<br>Context & Baseline | Detailed SA Framework guiding assessment of effects against the Objectives – same as in the SA/SEA for the Local Plan.  |
| <i>The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and</i> | Section 2<br>SA Methods<br>Table 2.1                       | Presents the SA Framework of objectives that shows the issues listed by the SEA Regulations that are progressed by which SA objective. The draft DPD was assessed against SA objectives by themes to avoid duplication and address inter-relationships. |

| SEA Directive & Regulation Requirements  | SEA Report Section     | Summary of Contents   |
|--|------------------------|---|
| <i>archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects</i> | Section 4              | Describes the likely significant effects of implementing the Net Zero Carbon DPD.<br><br>Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term.                      |
| <i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan</i>   | Section 4              | No significant negative effects were predicted; the SA noted where the Local Plan provided mitigation measures through Policies.  |
| <i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information</i>                                    | Section 2<br>Section 4 | The SA tested 3 scenarios – Do Nothing; National Approach to Improving Energy Efficiency; DPD with policies on Energy Efficiency, Energy Sources, Offsetting Carbon, Embodied Carbon, Exist Buildings Reasons set out in section 4. |
|  | Section 2<br>Method    | Outlines how the assessment was undertaken.   |
| <i>A description of the measures envisaged concerning monitoring</i>   | Section 5              | Outlines measures proposed for monitoring the environmental effects of the implementation of the DPD.   |
| <i>A non-technical summary of the information provided under the above headings</i>  | Separate Report        | Provides a non-technical summary.   |

## Appendix II: Equality Impact Assessment (EqIA)

### 1.0 Introduction

- 1.1 Under the Equality Act 2010, public authorities must in the exercise of their functions, have due regard to the need to eliminate discrimination, promote equality of opportunity, and foster good relations between people who share a relevant protected characteristic and persons who do not. The Public Sector Equality Duty (PSED, 2011) requires *“organisations to consider how they could positively contribute to the advancement of equality and good relations. It requires equality considerations to be reflected into the design of policies and the delivery of services, including internal policies, and for these issues to be kept under review”* (UK Equality & Human Rights Commission 2021).
- 1.2 The protected characteristics<sup>78</sup> are – age; disability; gender reassignment; marriage & civil partnership; pregnancy & maternity race; religion or belief; sex; and sexual orientation.
- 1.3 The EqIA is a tool that helps ensure that the different needs of people are taken into account as far as possible. The Equality Act does not define how an EqIA should be carried out or what it should include. The PSED guidance (2014) advises that organisations have found it useful to do so and that an existing impact assessment approach may be taken to all of the protected characteristics. It further advises to take *“a proportionate approach to assessing impact on equality”*. This means taking an approach that is suitable to the size, resources, and functions of the organisation, and to the relevance of the decision or policy to equality and good relations.
- 1.4 EqIA practice in the UK has established an approach that considers the main purpose and aims of a policy, plan, or project, the relevant published baseline information available, and then seeks to identify any negative or positive impacts on any of the protected groups. Can any identified negative impacts be removed, minimised, or justified? Can any identified positive impacts be enhanced? Is there any monitoring of identified issues required? If there are no significant negative impacts identified through this initial screening approach, then it is not necessary to continue to a full impact assessment. The magnitude, scale, duration, and significance of such impacts is difficult to quantify, and established practice uses professional judgment with a descriptive assessment of likely impacts, seeking to identify positive or negative and any uncertainties.

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<sup>78</sup> <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

## 2.0 Context & Baseline Information

- 2.1 The main purpose of the Net Zero Carbon DPD is to provide more detailed advice and guidance regarding development planning – it updates the Warwick Local Plan (2017) with regard to aims for net zero carbon. The DPD aims to support the Council becoming a net-zero carbon organisation by 2025 and facilitating decarbonisation by local businesses, other organisations, and residents so that total carbon emissions within Warwick District are as close to zero as possible by 2030.
- 2.2 The adopted Local Plan is consistent with the wider objectives of the Warwick District Council, and these include equality objectives<sup>79</sup>. The NZC DPD has been prepared to be in conformity with the Local Plan. The development plan document seeks to provide clarity, transparency, and consistency of requirements to progress towards net zero carbon for applicants, landowners, and communities in the Warwick District area.
- 2.3 The NZC DPD includes new policies, as follows:
- Overarching Strategy  
Policy NZC1 Achieving Net Zero Carbon Development
  - Reducing Energy Demands  
Policy NZC2(A) Net Zero Carbon - Making Buildings Energy Efficient
  - Energy Sources  
Policy NZC2(B) Net Zero Carbon - Energy Sources
  - Carbon Offsetting  
Policy NZC2(C) Net Zero Carbon – Offsetting Residual Carbon
  - Embodied Carbon  
Policy NZC3 Net Zero Carbon – Embodied Carbon
  - Existing Buildings  
Policy NZC4 Net Zero Carbon – Existing Buildings
- 2.4 Other plans, programmes and assessments have informed the preparation of the NZC DPD, the Sustainability Appraisal, and the EqIA. The SA framework that formed the basis for assessment of the Local Plan and the DPD includes relevant SA Objectives, and especially SA No 12 Meet housing needs; SA No 13 Increase accessibility; SA No 14 Increase health; and SA No 15 Reduce poverty and social exclusion.
- 2.5 The SA report includes a summary of relevant plans and programmes and describes the overall baseline conditions for the area. The Warwick District Equality & Diversity Profile (2011) informed the preparation of the Local Plan. Some 64% of the population in WDC is of working age, of which 68.2% is males and 59.8% females. 16.7% of the WDC population is children under 16 years old, of which some 17% are males and 16.1% females. 19.3% of the WDC population is of pensionable age at over 60 years old, of which 14.4% are males and 24.1% are females.

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<sup>79</sup> [https://www.warwickdc.gov.uk/info/20623/equality\\_and\\_diversity/1122/our\\_equality\\_objectives](https://www.warwickdc.gov.uk/info/20623/equality_and_diversity/1122/our_equality_objectives)

- 2.6 Approximately 71% of the WDC population states that they are Christian with some 26.3% stating that they do now follow any religion. The next highest report of stated religion is for Sikh at 3.4%; other religions stated (Jewish, Muslim, Buddhist, Other) are all less than 1%. The estimated resident population by broad ethnic groups is 92.3% White, 4.2% Asian, 1.4 Mixed, 1.1% lack, and 1.0% Other. Some 16.8% of people in WDC area consider themselves to have a limiting long-term illness. The estimated number of the adult population (16+) who may identify as lesbian, gay, or bisexual ranges from 1.5 – 7%.
- 2.7 The Index of Multiple Deprivation (IMD) is made up of seven indices, each of which measures a different aspect of deprivation (income, employment, health, education & skills, barriers to housing & services, crime and living environment.) There are also two supplementary indices (Income Deprivation Affecting Children and Income Deprivation Affecting Older People). The Lower Layer Super Output Area (LSOA) is a geographical area throughout England and with a population of 1-2000 people. Each SOA is ranked according to its relative level of deprivation, based on a number of indices including the IMD. Most of the SOAs in Warwick DC are ranked within the 70% least deprived areas nationally. The absence of a safe and secure place in which to live can have negative effect on physical and mental health and wellbeing. For Warwickshire (Jan-December 2021)<sup>80</sup>, the total number of crimes was 65 per 1,000 persons with violence and sexual offences the highest category of crime. For the WDC area, the total crimes were 62.7 per 1,000 persons.
- 2.8 Accessibility to good quality housing, employment, facilities and services, including open and green spaces, are key factors for reducing inequalities. The Local Plan and the NZC DPD are inclusive of all equality characterisation groups. The Local Plan and the NZC DPD do not target towards or against any of the equality groups. The Local Plan seeks to have positive effects on social inequalities by setting out the development needs for the WDC population. The NZC DPD seeks to provide further information and guidance on how new development can contribute to the Council's aims for progressing to net zero carbon.
- 2.9 Using the available information and professional judgment, these potential impacts were considered against the categories of protected characteristics to scope the extent of the EqIA, as follows:

| Equality Group | Potential Impacts | Commentary   |
|----------------|-------------------|--|
| Age            | ?                 | The requirements for net zero carbon in new buildings may differentially impact more adversely the very young or the very old (as these are more likely to have vulnerabilities). Similarly, positive effects from net zero carbon requirements may accrue more in the very young or very old. |

<sup>80</sup> <https://data.warwickshire.gov.uk/>



|   |                       |  |
|---|-----------------------|--|
| <b>Disability – physical or mental</b>  | ?                     | The requirements for net zero carbon in new buildings may differentially impact more adversely or more positively those with a physical or mental disability.  |
| <b>Gender Re-assignment</b>             | Neutral<br>Negligible | There is no clear relationship or direct impact on equal opportunities from the DPD for people intending to undergo, undergoing, or that have undergone gender reassignment.   |
| <b>Marriage &amp; Civil Partnership</b> | Neutral<br>Negligible | There is no clear relationship or direct impact on equal opportunities from the DPD for people who are married or within a civil partnership.  |
| <b>Pregnancy &amp; Maternity</b>        | Neutral<br>Negligible | There is no clear relationship or direct impact on equal opportunities from the DPD for pregnant women or women on maternity leave.  |
| <b>Race</b>                             | Neutral<br>Negligible | Race relates to a group of people defined by their race, colour & nationality, ethnic or national origins, and including gypsies & travellers. There is no clear relationship or direct impact on equal opportunities from the DPD for people of different race.                         |
| <b>Religion or Belief</b>               | Neutral<br>Negligible | There is no clear relationship or direct impact on equal opportunities from the DPD for people of different religion, faith, belief.   |
| <b>Sex /Gender</b>                      | Neutral<br>Negligible | There is no clear relationship or direct impact on equal opportunities from the DPD for women or men.<br>Women may be more affected through other equality groups – age & disability – as women are more often involved in responsibilities for children, the elderly, and the disabled. |
| <b>Sexual Orientation</b>               | Neutral<br>Negligible | There is no clear relationship or direct impact on equal opportunities from the DPD for different sexual orientation groups.   |

### 3.0 Equalities Assessment

- 3.1 The initial scoping identified that the EqIA should focus on the impacts of the proposals with regard to the protected characteristics of Age and Disability since these groups are more likely to have vulnerabilities that might be affected by the policies in the NZC DPD.
- 3.2 Overall, the NZC DPD updates and adds to existing Local Plan Policies associated with building standards and other sustainability requirements, planning for climate change adaptation, planning for renewable energy and low carbon generation, and assessing viability including carbon offsetting. It is focused on the role that the land use planning system can have to progress the commitments made by the Council when adopting its Climate Change Action Programme in 2020. Major positive effects were found for SA objectives on air quality and climate change, particularly in the longer term.

By reducing the risks to health and wellbeing associated with climate change through extreme weather events, the risks to vulnerable people may be reduced with positive effects. Whilst the Local Plan and associated planning documents seek to be inclusive of all groups, the focus of the DPD to progress towards net zero carbon is likely to have some further positive effects for the Age and Disability groups since these include people with more vulnerabilities.

- 3.3 There is the possibility that the requirements for net zero carbon could compromise the viability and implementation of certain development proposals. This could result in housing needs not being met – with potential negative effects, including for those persons with particular needs, such as the elderly or disabled. However, mitigation measures are provided in the DPD. The Council has undertaken a high-level viability impact assessment and development viability is unlikely to be threatened by the local requirements. The policies recognise that the carbon reductions sought could be unviable or not feasible in some situations and makes provision for such a situation – but only in exceptional circumstances.

## **4.0 Conclusion**

- 4.1 Overall, the NZC DPD will enhance the local environment, reducing risks associated with the effects of climate change, and thus with improvements in wellbeing for all people. The EqIA has found that the DPD is unlikely to result in negative equality impacts that would require justification or mitigation. No options have been missed to promote equality of opportunities and thus further details do not need to be provided of action that could be taken to remedy this. Therefore, no further EqIA is required and the PSED has been met.