

## **Sustainability Appraisal (incorporating Strategic Environmental Assessment, Equality Impact Assessment & Habitats Regulations Assessment): NON-TECHNICAL SUMMARY (NTS)**

### **This is the NTS of the Sustainability Appraisal (SA) Report**

1. This is the NTS of the SA Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the Warwick District Net Zero Carbon Development Plan Document (DPD). This summary is an integral part of the SA Report that accompanies the draft DPD for public consultation in spring 2022. It provides an outline of the SA process and findings, including how the SA has influenced the development of the draft Plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

### **The Warwick Local Plan 2011-2029 & the Net Zero Carbon Development Planning Document (DPD)**

2. The overarching development plan document (DPD) for the Warwick District area is the Local Plan that was adopted in September 2017. The Council has also published a Supplementary Planning Document (January 2019) to update the situation with regard to air quality and reflect the increasing concern about air quality and climate change. Warwick District Council declared a climate emergency on 27 June 2019 and made a number of commitments, including 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.
3. The Net Zero Carbon DPD outlines the issues facing the Council. It has been prepared in accordance with national planning requirements. The DPD sets out the issues for net zero carbon and it requires stricter carbon emissions than those to be implemented through national standards in order to update the policies in the Local Plan and to support the Council's climate change commitments. It is structured into sections, as follows:
  - The Local Context
  - The National Context
  - The Planning Policy Context
  - Aims and Objectives
  - 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
- Viability
- Warwick District Local Plan 2011-2029: Policies superseded or amended
- Glossary  
Appendix 1: Policy Context

### **Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)**

4. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of environmental, social, and economic considerations in the preparation of Local Plan Documents (DPDs). This requirement for SA is in accordance with planning legislation and paragraph 32 of the National Planning Policy Framework. DPDs must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
5. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SA/SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this the scope of the SA is prepared and includes a SA Framework of objectives for sustainable development relevant to the Warwick district area and climate change, and which forms the basis against which the draft DPD is assessed.
6. Local Plan Documents must also be subject to Habitats Regulations Assessment (HRA). The Habitats Regulations (amended 2018) 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 sites. It is a requirement to consider if the plan is likely to have significant effects on any relevant designated site. HRA is a two staged process – screening, and then appropriate assessment (if significant adverse effects are screened as likely).

## **Sustainability Characteristics of the Warwick District Area & Likely Evolution without the DPD**

7. 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 its adoption in 2017. There are no internationally designated sites (SACs, SPAs or Ramsar) within a 15 km radius of the Warwick District area. There is no nationally designated landscape (AONB) but the landscapes in the District are valued for their scenic qualities, rich wildlife and cultural associations. Much of the rural areas is designated as Green Belt. The District has a rich historic and cultural heritage.
8. Air quality and traffic congestion, particularly in the main towns, are key issues. The Council has designated five air quality management areas (AQMAs) due to elevated annual average concentrations of nitrogen dioxide (NO<sub>2</sub>) in Warwick, Leamington Spa and in Kenilworth. The Council's recent Air Quality SPD (January 2019) guides new development with regard to transport, air quality, energy and green infrastructure.
9. There is a network of rivers, waterbodies and watercourses running through the District, including the two canals 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. 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 and wellbeing, together with its contribution to climate change resilience and role in sustainable water management.
10. The rural parts of the district comprise mostly agricultural land quality Grades 3a & 3b. 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. The population has grown from 124,000 in 2000 to around 142,000 in 2018.
11. 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 business means that some of the District's traditional industrial areas require regeneration.
12. The preparation of the Local Plan was informed by various studies on climate change, low carbon and renewable energy. Early work established that energy consumption is dominated by heat whereas CO<sub>2</sub> emissions are more balanced between heat and electricity.
13. Warwick District Council have started preparation of a new South Warwickshire Local Plan - a joint plan between Warwick and Stratford-on-Avon District Councils with studies ongoing to investigate the carbon emissions and effectiveness of different interventions to achieve targets for climate change.

## Key Sustainability Issues, Problems and Opportunities

14. 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 & 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 & wellbeing from higher temperatures and more extreme weather
- Flooding and water resources – their wider role in sustainable water management and climate change resilience
- 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 (delayed for 5 years)

15. Without the Warwick Net Zero Carbon DPD to guide and manage new development in an integrated and holistic way, issues for climate change would not get resolved in an integrated and holistic manner. The DPD sets out how the Council expects new development to contribute to achieving its targets. It also provides the opportunity to present updating of requirements for climate change since the Local Plan was adopted in 2017.

## How has the Warwick Net Zero Carbon DPD been assessed?

16. The SA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in the following table:

SA Objective
1. To have a strong and stable economy
2. To enable a range of sustainable transport options
3. To reduce the need to travel
4. To reduce the generation of waste and increase recycling

5. To ensure the prudent use of land and natural resources
6. To protect and enhance the natural environment
7. To create and maintain safe, well-designed, high quality built environments
8. To protect and enhance the historic environment
9. To create good quality air, water and soils
10. To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources
11. To adapt to the predicted impacts of climate change including flood risk
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)
13. To protect, enhance and improve accessibility to local services and community facilities
14. To improve health and well being
15. To reduce poverty and social exclusion
16. To reduce crime, fear of crime and antisocial behaviour

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.

### What reasonable alternatives have been considered & addressed?

17. The SA tested three scenarios – Do-Nothing; the National Approach to Improving Energy Efficiency; and the draft Net Zero Carbon DPD that includes energy efficiency, zero or low carbon sources, offsetting carbon, and existing buildings. 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.
18. 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.

### **What are the likely significant effects of the draft DPD? How has the SA influenced the draft DPD?**

19. Many of the elements of the DPD are inter-related – because it focuses on climate change which is affected by emissions to air and water that are affected by various activities. Overall, the implementation of the Net Zero Carbon DPD is likely to have major positive effects for housing and health, air quality and climate change. 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 addressing climate change.
20. The DPD has recognised where there could be certain negative effects arising from requirements to achieve zero carbon and ensured that there are additional mitigation measures to support and/or strengthen the policies in the adopted Local Plan. The application of a stricter policy through NZC1 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. The policies also include some flexibility to account for site specific and viability constraints.

### **How could negative effects be mitigated?**

21. The SA did not identify any significant negative effects from the implementation of the DPD.

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

22. The HRA was updated in consideration of recent significant changes to HRA practice in the UK. A pragmatic and proportional approach was taken and to clearly demonstrate due process in line with updated guidance. The HRA screening identified the possibility, although not likely, of environmental pathways in respect of the water environment. However, there is embedded mitigation in the Local Plan Policies, and 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 protected site of the Severn Estuary.

## **Equality Impact Assessment (EqlA)**

23. Under the Equality Act (2010), public authorities must have regard to the need to eliminate discrimination, promote equality of opportunity, and foster good relations between people who share a protected characteristic and persons who do not. An Equality Impact Assessment (EqlA) 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). The protected characteristics are – age; disability; gender reassignment; marriage & civil partnership; pregnancy & maternity; race; religion or belief; sex; and sexual orientation.
24. 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 EqlA has found that the DPD is unlikely to result in negative equality impacts that would require justification or mitigation. No further EqlA is required and the PSED has been met.

## **Were there any difficulties encountered?**

25. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties, particularly with regard to climate change and longer-term effects, for example in predicting the likely future baseline, and assumptions were made using professional judgment.

## **Consultation**

26. The proposed scope of the SA was consulted on in May-June 2021 with the statutory bodies (Historic England, Environment Agency, and Natural England) and comments received by HE and NE have been taken into account in developing the DPD and the SA. This SA Report accompanies the draft Warwick Net Zero Carbon DPD for wider consultation with stakeholders and the public in spring 2022. The draft DPD and supporting evidence, including the SA Report and any comments on it, will be sent to the Secretary of State for independent examination by a Planning Inspector.

## **Monitoring Proposals**

27. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. The Warwick monitoring strategy for the Local Plan is considered satisfactory for the requirements from the SA process.