

# Sustainability Appraisal of the South Warwickshire Local Plan

## Regulation 18: Issues and Options Stage

### Volume 1 of 3: Non-Technical Summary

November 2022



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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Regulation 18: Issues and Options Stage

Volume 1 of 3: Non-Technical Summary

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# Non-Technical Summary

## Introduction

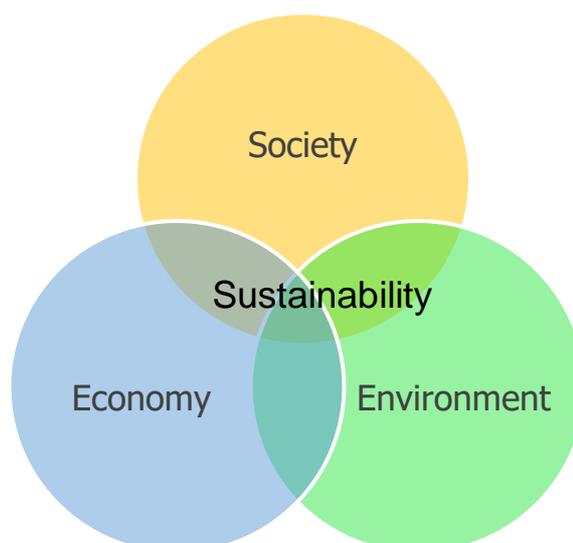
- N1. Lepus Consulting is conducting a Sustainability Appraisal process for the South Warwickshire Local Plan (SWLP) Authorities of Stratford-on-Avon District Council and Warwick District Council to help them prepare the SWLP. The appraisal process is known as Sustainability Appraisal (SA) and is prepared during a number of different stages of the plan making process to facilitate iteration between the Plan makers (the SWLP Authorities) and the appraisal team (Lepus Consulting).
- N2. The SWLP is being prepared to determine the development needs within the districts for housing and jobs up to 2050 and to develop the planning policies that will be used to consider applications for development.
- N3. The primary role of the Local Plan is to promote a sustainable pattern of development that seeks to meet the needs of South Warwickshire, align growth and infrastructure, improve the environment, mitigate climate change and adapt to its effects.
- N4. SA is the process of informing and influencing the preparation of a development plan to optimise its sustainable development performance as the plan is prepared over several distinct stages including examination in public, and finally, adoption.
- N5. This document comprises a Non-Technical Summary (NTS) of the SA for the SWLP Issues and Options, which presents an assessment of the likely sustainability performance of the options presented in the SWLP Issues and Options document.
- N6. The preparation of the SWLP will be undertaken in a number of stages. The first stage of Local Plan preparation was called 'Scoping and Call for Sites' and was issued for public consultation in 2021. The current stage is called 'Issues and Options' which will be used to inform the next stage of Local Plan preparation.

## What is Sustainability Appraisal?

- N7. Sustainability can be defined as "*meeting the needs of the present generation without compromising the ability of future generations to meet their own needs*"<sup>1</sup>. To be sustainable, development requires the integration of the needs of society, the economy and the environment (see **Figure N.1**).
- N8. SA is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

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<sup>1</sup> Brundtland (1987) Report of the World Commission on Environment and Development: Our Common Future. Available at: <http://www.un-documents.net/our-common-future.pdf> [Date Accessed: 14/04/22]



*Figure N. 1: Sustainable development*

- N9. The Planning and Compulsory Purchase Act<sup>2</sup> requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations<sup>3</sup> (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including local plans, to ensure that environmental issues are fully integrated and addressed during decision-making.

#### Best Practice Guidance

- N10. Government policy recommends that both SA and SEA are undertaken under a single process, which incorporates the requirements of the SEA Directive. This is to be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:
- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment
  - Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive
  - Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans
  - Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF) Paragraph 32
  - Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance (PPG)
- N11. SA is an iterative process which should be undertaken alongside development of the SWLP to maximise its sustainability performance as summarised in **Figure N.2**.

<sup>2</sup> Planning and Compulsory Purchase Act 2004. Available at:  
<https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 14/04/22]

<sup>3</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at:  
<http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 14/04/22]

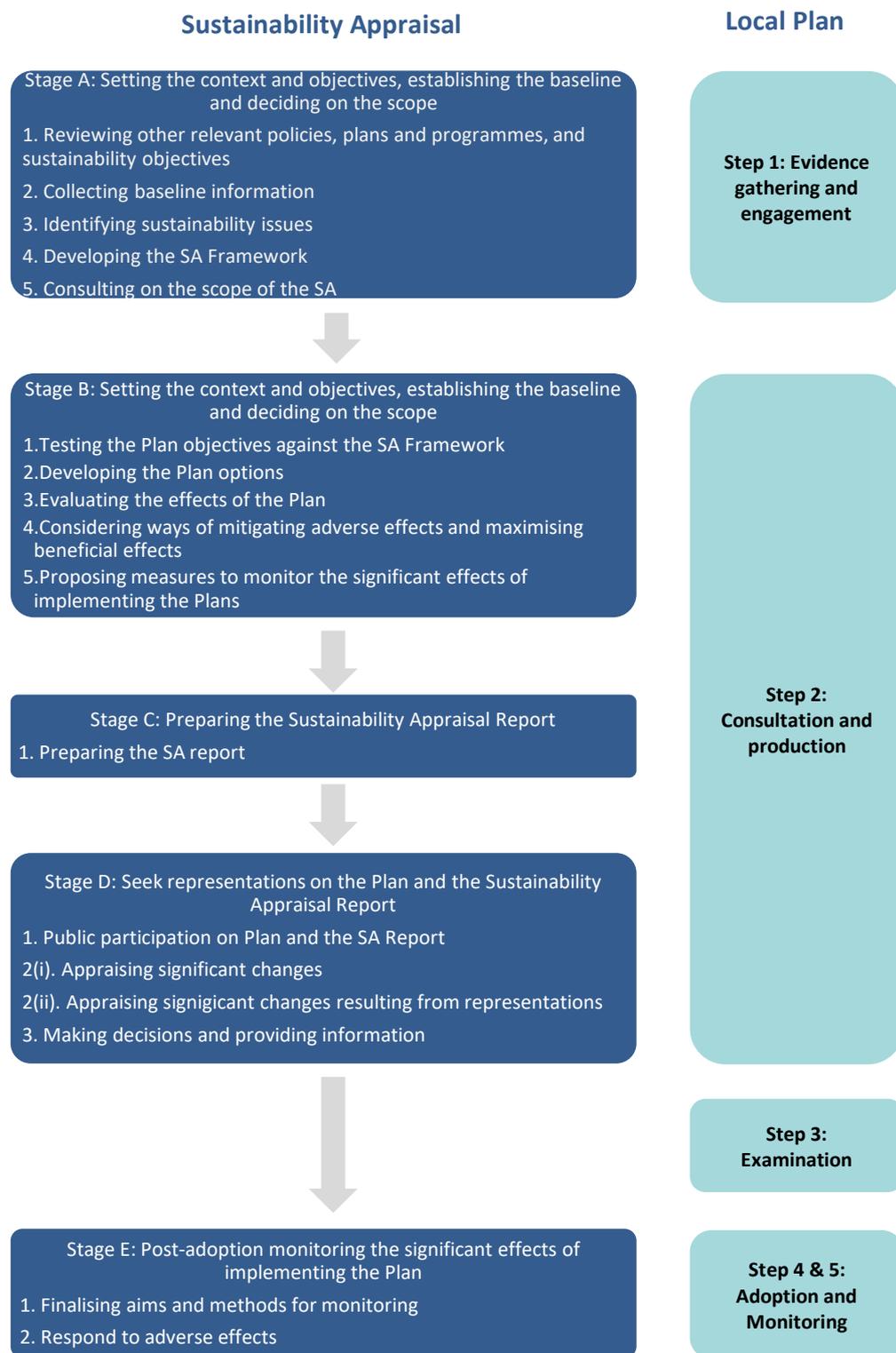


Figure N.2: Sustainability Appraisal process

## South Warwickshire

- N12. Stratford-on-Avon District and Warwick District Councils together comprise roughly 126,390ha, with a combined population of approximately 283,200 people according to the Office for National Statistics (ONS) Census data for 2021<sup>4</sup>.
- N13. Stratford-on-Avon District and Warwick District lie within the south of Warwickshire County. As illustrated in **Figure N.3**, the majority of Stratford-on-Avon District is largely rural in nature. In contrast, Warwick District covers a smaller geographic area and is more densely populated.
- N14. The town of Royal Leamington Spa is the most populous town in the Plan area with a population of roughly 52,000. The town is characterised by its regency architecture. Royal Leamington Spa is adjoined with the town of Warwick in the west, Whitnash town in the south and is adjacent to Cubbington village. The River Leam runs through Royal Leamington Spa.
- N15. The town of Stratford-upon-Avon has a population of approximately 29,984. Stratford-upon-Avon is a medieval market town situated on the River Avon. The town has strong associations with its heritage interests and numerous Grade I, Grade II\* and Grade II listed buildings are situated within it.

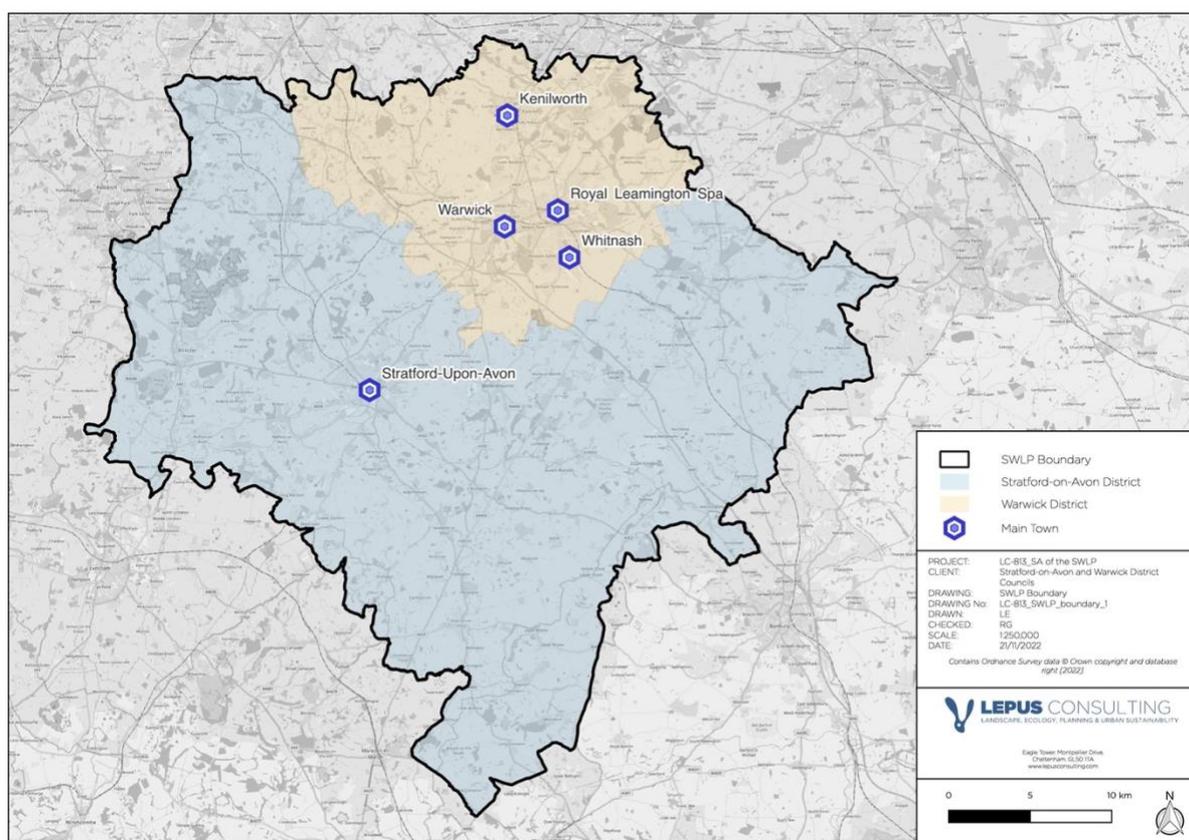


Figure N. 3: Map of the South Warwickshire Plan Area

<sup>4</sup> Office for National Statistics (2022) Population and household estimates, England and Wales: Census 2021. Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021> [Date accessed: 01/11/22]

- N16. Together the two authorities contain important biodiversity sites, high quality landscape, and a wealth of historic assets. Notable features include the Cotswolds AONB which covers a small proportion of Stratford-on-Avon district in the south, Warwick Castle which is a Grade I listed building, as well as Registered Park and Gardens and a significant amount of Greenbelt land which covers the northern area of both districts.
- N17. In general, the SWLP area has good connections through national and regional transport infrastructure, although there are some issues with rural accessibility. The area provides approximately 159,200 jobs.

### The SA Process So Far

- N18. **Figure N.4** illustrates the different stages of SA and outputs that are planned as part of the SA of the Local Plan up to the 'Publication Stage' which is presently scheduled for 2024. The process is currently at the second stage, called Issues and Options.

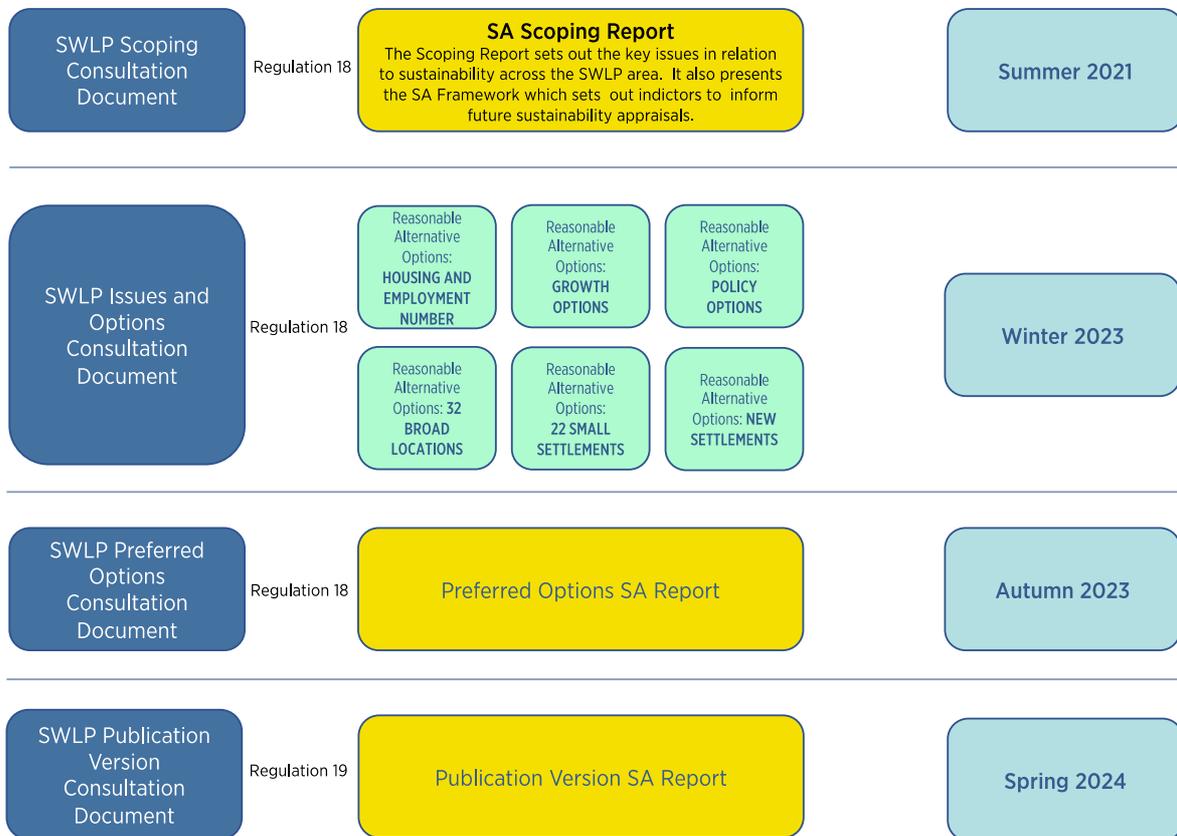


Figure N.4: The SA process so far

### SA Scoping Report

- N19. The first stage of the process, scoping, was completed in June 2022. The SA Scoping Report specifies the scope and level of detail of information to be included in the SA process. The SA Scoping Report represented Stage A of the SA process (see **Figure N.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;

- Collecting baseline information;
- Identifying sustainability problems and key issues;
- The SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

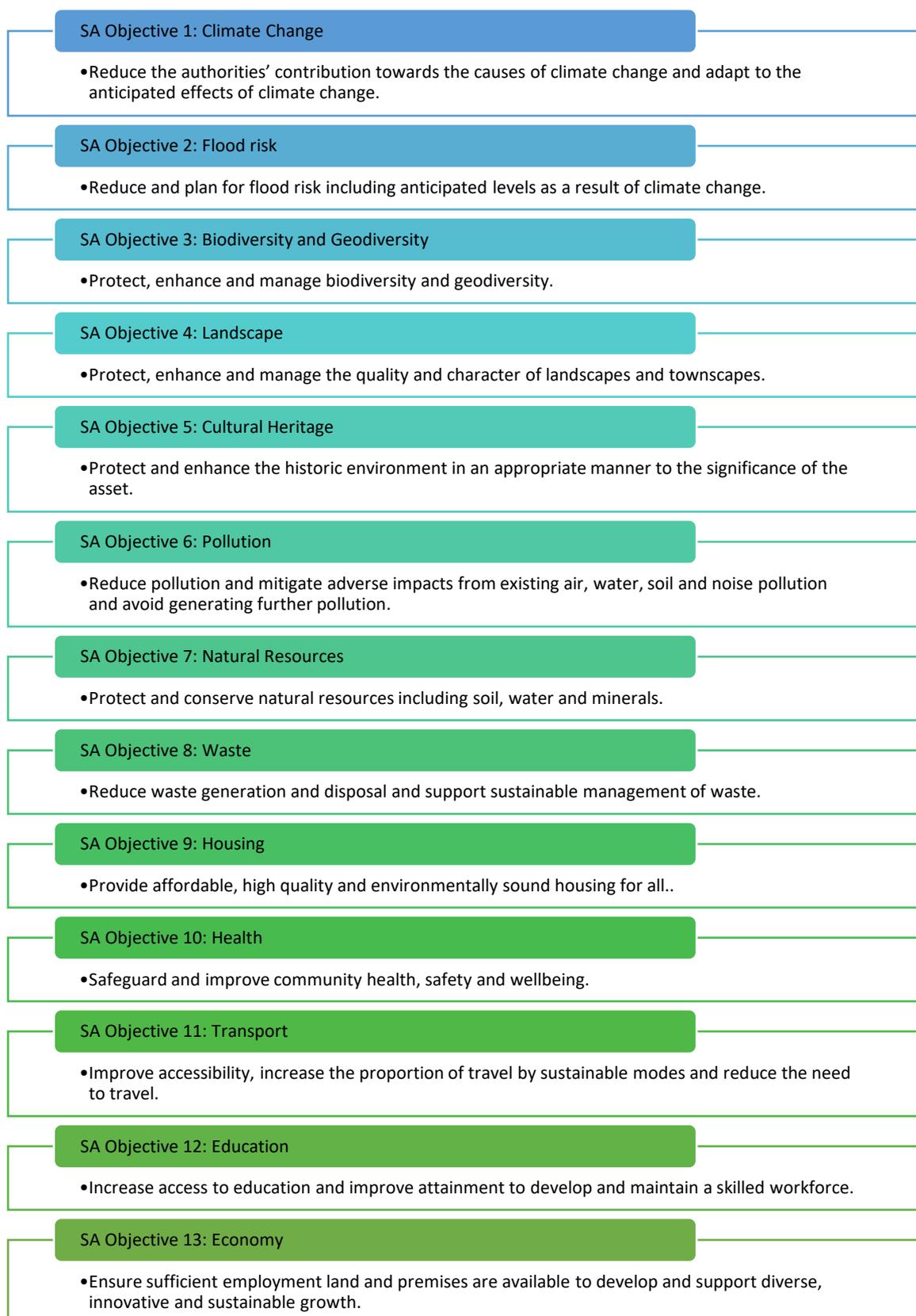
N20. The Scoping Report was consulted on with the statutory bodies: Natural England, Historic England and the Environment Agency.

### Sustainability Appraisal Framework

N21. As part of the SA scoping work, key sustainability issues are identified, and a SA Framework established which includes SA Objectives, decision-making criteria and indicators. The SA Framework provides a way in which sustainability effects can be described, analysed and compared. SA Objectives and indicators can be revised as further baseline information is collected and sustainability issues and challenges are identified.

N22. The SA Framework is provided in **Appendix A** of the main SA Report. A summary of the 13 SA Objectives is shown in **Figure N.5**. It should be noted that the order of SA Objectives does not infer any prioritisation.

N23. Each section of the Issues and Options document has been subject to SA. Using the SA Framework and expert judgement, the likely sustainability impacts of the document have been assessed.



*Figure N.5: SA Framework Summary*

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### Reasonable alternatives: Identification, description and evaluation

- N24. The SEA Regulations state, as part of the requirements for preparing an environmental report, the local plan-making process must identify, describe and evaluate reasonable alternatives that have been considered.
- N25. There is no definitive guide as to what constitutes a ‘reasonable alternative’. A useful working definition is provided in the SEA/SA Planning Practice Guidance which states,
- “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings”.*
- N26. At this stage of plan-making the Councils have identified the following types of reasonable alternatives:
- Five Spatial Options which provide details about where housing and employment development should be distributed at a strategic scale across the Plan area;
  - Seven alternatives for New Settlement Locations for large scale development of not less than 6,000 new homes and associated infrastructure;
  - 32 Broad Locations which represent options for up to 2,000 homes located around the Main Settlements such as Warwick, Stratford-upon-Avon and Southam for medium scale, chiefly residential, development and associated infrastructure;
  - 22 Small Settlement Locations for intermediate scale, chiefly residential, development for between 50-500 homes in any one location, typically associated with smaller settlements and villages such as Wootton Wawen and Radford Semele; and
  - 116 Policy Options for shaping of the relevant policy. Subjects include, for example, climate change, tourism and employment.
- N27. The SA has assessed reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts, and it is the Councils’ role to use the SA findings, alongside other evidence base materials, to decide which alternatives to take forward in the plan-making process.
- N28. **Figure N.6** summarises the reasonable alternatives considered at this stage of the plan-making process.

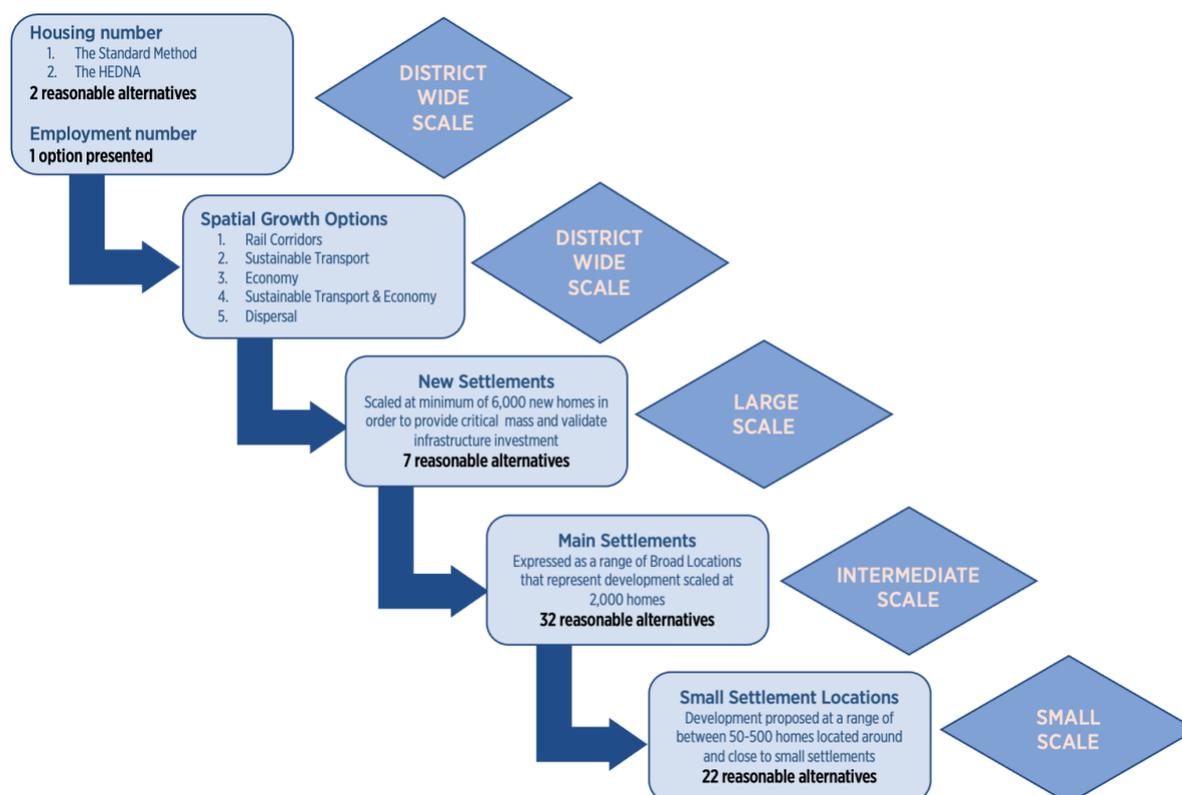


Figure N.6: Different scales of reasonable alternatives considered in this stage of Local Plan preparation

## Purpose and content of the Regulation 18 Sustainability Appraisal report

N29. This Non-Technical Summary comprises Volume 1 of 3 documents prepared for this stage of the SA. The Main SA Report is Volume 2 and the Appendices to the Main SA Report comprise Volume 3. The contents of the Main SA Report and Appendices are as follows:

- **Chapter 1** - Background information about South Warwickshire and the SA process and topics.
- **Chapter 2** – Topic specific methodologies and assumptions.
- **Chapter 3** – Identification of reasonable alternatives.
- **Chapter 4** – Evaluation of the Broad Locations at the main settlements.
- **Chapter 5** – Evaluation of the Small Settlement Locations.
- **Chapter 6** – Evaluation of the New Settlement Locations.
- **Chapter 7** – Evaluation of the Spatial Growth Options.
- **Chapter 8** – Evaluation of the Policy Options.
- **Chapter 9** – Housing and Employment number option assessments
- **Chapter 10** – Conclusions and next steps.
- **Appendix A** – The full SA Framework.
- **Appendix B** –Detailed assessment information concerning potential receptors and impacts at the Broad Locations.
- **Appendix C** – Detailed assessment information concerning potential receptors and impacts at the Small Settlement Locations.

- **Appendix D** – Detailed assessment information concerning potential receptors and impacts at the New Settlement Locations.
- **Appendix E** – Assessment of the different policy options identified in the SWLP Issues and Options Consultation Document.

### Reasonable alternatives: Housing and employment numbers

N30. The Issues and Options SA Report has assessed two housing numbers, summarised in **Table N.1**. These housing numbers were derived from the Housing and Economic Needs Assessment (HEDNA) trend-based projections (Option I) and the Government’s standard methodology, for calculating housing need as set out in Planning Practice Guidance (Option II). The methods for calculating housing need are described in more detail under Issue H1 of the Issues and Options document. While the HEDNA calculation of housing need identifies a lower overall figure for the sub-region, the annual housing need figures for the Stratford-on-Avon and Warwick Districts are higher than using the Standard Method.

*Table N. 1: Reasonable alternative housing number calculations*

<b>Option I</b>	The HEDNA trend-based projections point to a need for <b>4,906 dwellings annually</b> across the whole sub-region with 868 dwellings per annum in Stratford-on-Avon and 811 dwellings per annum needed in Warwick. Combined total of <b>1,679 dwellings per annum</b> .
<b>Option II</b>	The Standard Method calculation identifies a need for <b>5,554 dwellings annually</b> across Coventry and Warwickshire, but with 564 dwellings per annum in Stratford-on-Avon and 675 dwellings per annum needed in Warwick. Combined total of <b>1,239 dwellings per annum</b> .

N31. The assessment findings are summarised in **Table N.2**. Pursuing either of the options would result in a major positive impact on SA Objective 9 (Housing) as it is expected that the proposed housing numbers would largely cater to the housing needs of residents, including delivering affordable homes, student accommodation, older persons accommodation, specialist accommodation and self and custom build housing, along with the accommodation needs of gypsy and traveller and travelling showpeople communities. Using the HEDNA figure should more accurately represent local housing needs than the Standard Method and therefore Option I should meet the accommodation needs of the various members of the community more successfully.

N32. Both the housing number options could have negative impacts on SA Objectives 1, 3, 6 and 7. Substantial new housing development would be likely to give rise to major negative impacts on climate change and potentially have adverse impacts on biodiversity and result in pollution emissions. It is likely that a significant loss of Best and Most Versatile agricultural soils could not be avoided and a significant adverse impact on natural resources would be anticipated. The increase in waste generated from construction and occupation of housing would be likely to lead to a negative impact on SA Objective 8.

N33. Given the quality of the landscape across the plan area, delivering large scale housing development would potentially have an adverse impact on the landscape and townscape character. The impact of Option I on SA Objective 4 and 5 will be potentially higher than Option II due to higher housing numbers.

N34. Planning for the delivery of new housing to meet accommodations needs has the potential to locate people in closer proximity to their workplaces/employment sites for those living and working in the plan area and offers a greater likelihood of reduced travel times and more sustainable transport choices. As a result, a minor positive impact on SA Objective 13 could be expected.

N35. The consideration of housing number calculations does not provide any locational information as to where development would come forward and therefore impacts on SA Objectives 1, 5, 10 and 12, Flood Risk, Cultural Heritage, Health and Education are uncertain.

N36. In terms of identifying a best performing option, Option II performs better overall (see SA Objectives 1-8). In the case of some objectives, it is difficult to identify a best performing option (see SA Objectives 10, 11, 12 and 13).

Table N. 2: SA performance of the housing number options (extracted from Issues and Options SA Report)

	1	2	3	4	5	6	7	8	9	10	11	12	13
Options	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
Option I	--	+/-	-	--	+/-	-	--	-	++	+/-	-	+/-	+
Option II	--	+/-	-	--	+/-	-	--	-	++	+/-	-	+/-	+
Best performing	II	II	II	II	II	II	II	II	I	?	?	?	?

N37. No reasonable alternative employment floorspace options were identified. The HEDNA has considered employment land requirements across Coventry and Warwickshire to 2050. Within the SWLP area, a requirement of 345.3 hectares for office and general industrial land has been proposed to meet needs until 2050. For strategic B8 employment land (i.e. warehousing and distribution), a proportion of the sub-regional figure of 709 hectares will also be required.

N38. In the case of the plan area, the requirements for office space and general industrial uses have been apportioned to Warwick and Stratford-on-Avon as shown in **Table N.3**.

Table N. 3: Employment need calculation

	Office	General Industrial	Total
Stratford-on-Avon District	7.2	240.9	248.1
Warwick District	15.8	81.4	97.2

N39. The assessment findings are summarised in **Table N.4**. It is expected that the new employment land allocations and developments will generate more jobs and employment opportunities, create new investment opportunities and encourage creation of small and micro-businesses, therefore a major positive impact on SA Objective 13 is expected.

N40. It is assumed that the new employment opportunities would be beneficial for people living, visiting or working in the plan area in terms of job creation and the opportunity to develop skills, therefore a minor positive impact on SA Objective 12 (Education) is anticipated.

- N41. Development associated with new employment could have a major negative impact on SA Objectives 1 and 6 and minor negative impacts on SA Objective 3 as the increase in economic and industrial activities would give rise to adverse impacts on climate change and pollution emissions and could potentially be detrimental for the plan area’s biodiversity and geodiversity.
- N42. Given the high value and sensitivity of the landscape across the plan area, delivering the employment number and the spread of development could potentially have an adverse impact on the sub-region’s landscape and townscape character and a major negative impact on SA Objective 4 could occur.
- N43. With new economic development, there may be increased pressure on existing transport infrastructure to meet the transport needs of people living, visiting or working in the plan area and therefore it is assumed that SA Objectives 10 and 11 may be negatively impacted. The increase in waste generated from construction and occupation would translate into a minor negative impact on SA Objective 8.
- N44. With respect to the natural resources in the region, especially water and soil, large-scale economic and industrial development would affect the quality of these resources and thus a major negative impact on SA Objective 7 could also be anticipated.

*Table N. 4: SA performance of the employment number option (extracted from Issues and Options SA Report)*

1	2	3	4	5	6	7	8	9	10	11	12	13
Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
--	0	-	--	+/-	--	--	--	0	-	-	+	++

### Reasonable alternatives: Spatial Growth Options

N45. Spatial Growth Options set out the different locations across the plan area where development may be directed to meet the needs of South Warwickshire to 2050. The options seek to provide homes, jobs, green spaces and other infrastructure in the most suitable and sustainable places. The Councils have identified five Spatial Growth Options as follows:

- Option 1: Rail Corridors
- Option 2: Sustainable Travel
- Option 3: Economy
- Option 4: Sustainable Travel and Economy
- Option 5: Dispersed

N46. Each option includes a list or framework of settlements that might be best placed to deliver each Spatial Growth Option. The settlement locations shown in the options are indicative and should not be taken as firm proposals. The assessment findings are summarised in **Table N.5.**

Table N. 5: SA Performance of the Spatial Growth Options

Spatial Option	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Rail Corridors	-	0	+/-	-	+/-	+	+	-	++	+/-	++	+/-	+
Sustainable Travel	-	0	-	+	+/-	+	+	-	++	+/-	+	+/-	+
Economy	-	0	-	-	+/-	+/-	-	-	++	+/-	-	+/-	++
Sustainable Travel & Economy	-	0	-	-	+/-	+/-	-	-	++	+/-	+	+/-	++
Dispersed	--	0	--	+	+	+/-	0	-	++	--	--	-	-

- N47. It should be noted that there is considerable overlap between some of the options. For example, Option 2 (Sustainable Travel) is a hybrid of rail corridor options and bus options presented in the 2021 Issues and Options scoping exercise<sup>5</sup>, making it similar in some respects to Option 1 (Rail Corridors). Option 4 (Sustainable Travel and Economy) is a hybrid of Spatial Growth Options 2 and 3.
- N48. Each Spatial Growth Option is evaluated by SA Objective and then ranked, since the SA scores have limited granularity (see **Table 2.1** in the methodology). The rank is a high level indication about which option would be likely to perform best when compared to each other. Whilst some options may have the same overall SA score, it is possible to specify that one would likely perform better than the other.
- N49. High level assessment of Spatial Growth Options that are not distinct from each other, with the exception of Option 5, means that sustainability performance can only be evaluated with several caveats. These include the fact that detailed locational information is not available and the ability to identify effects with precision is challenging. The scores in the summary assessment tables are strictly a guide and do not represent a diagnostic analysis. Mitigation has not been factored into the performance of the Growth Options since this is best worked up once more detailed locational information is available.
- N50. Different options are likely to perform better for certain SA Objectives than others. With this in mind, an overall best performing option is hard to identify. Option 5 is the worst performing option whilst Option 2 is likely to align most closely with development that will ultimately seek the most effective mitigation against climate change. These options will also deliver better performance in respect of pollution and natural resource impacts since development associated with these options would be slightly more concentrated than Options 3 and 4. However, whilst they all perform positively for employment and economy,

<sup>5</sup> Scoping and Call for Sites Consultation. Available at: <https://www.southwarwickshire.org.uk/swlp/scoping-and-call-for-sites-consultation.cfm> [Date accessed: 22/11/22]

Options 3 and 4 perform the best in this respect. Without further detail, all options perform the same for waste and housing.

### Reasonable alternatives: Broad Locations

N51. The initial list of settlements to be considered for this stage of the assessment were provided by the SWLP team and comprised:

- Alcester
- Kenilworth
- Royal Leamington Spa and Whitnash
- Shipston-on-Stour
- Southam
- Stratford-upon-Avon
- Warwick

N52. Lepus identified 32 Broad Locations surrounding these settlements, based on information in the South Warwickshire Settlement Analysis and seeking to support the principles of the 20-minute neighbourhood. The locations are shown on **Figure N.7**. The following principles were used to identify Broad Locations:

- 50% of the land parcel should be within 800m of at least one of the following services: public transport (train station or bus station), GP surgery, a primary school, a local shop and/or publicly accessible green space.
- Land with the following constraints was excluded from the assessment location: Flood Zones 2 or 3, Areas of Outstanding Natural Beauty, Grade 1 agricultural land, Scheduled Monuments, Sites of Special Scientific Interest, Registered Parks and Gardens and Ancient Woodland.

N53. The Broad Locations seek to accommodate up to 2,000 dwellings at a density of 35 dwellings per hectare. Housing to green space for green infrastructure should operate on a ratio of 60:40 of the total area. In other words, at least 40% of the land area should be planned for the provision of GI.

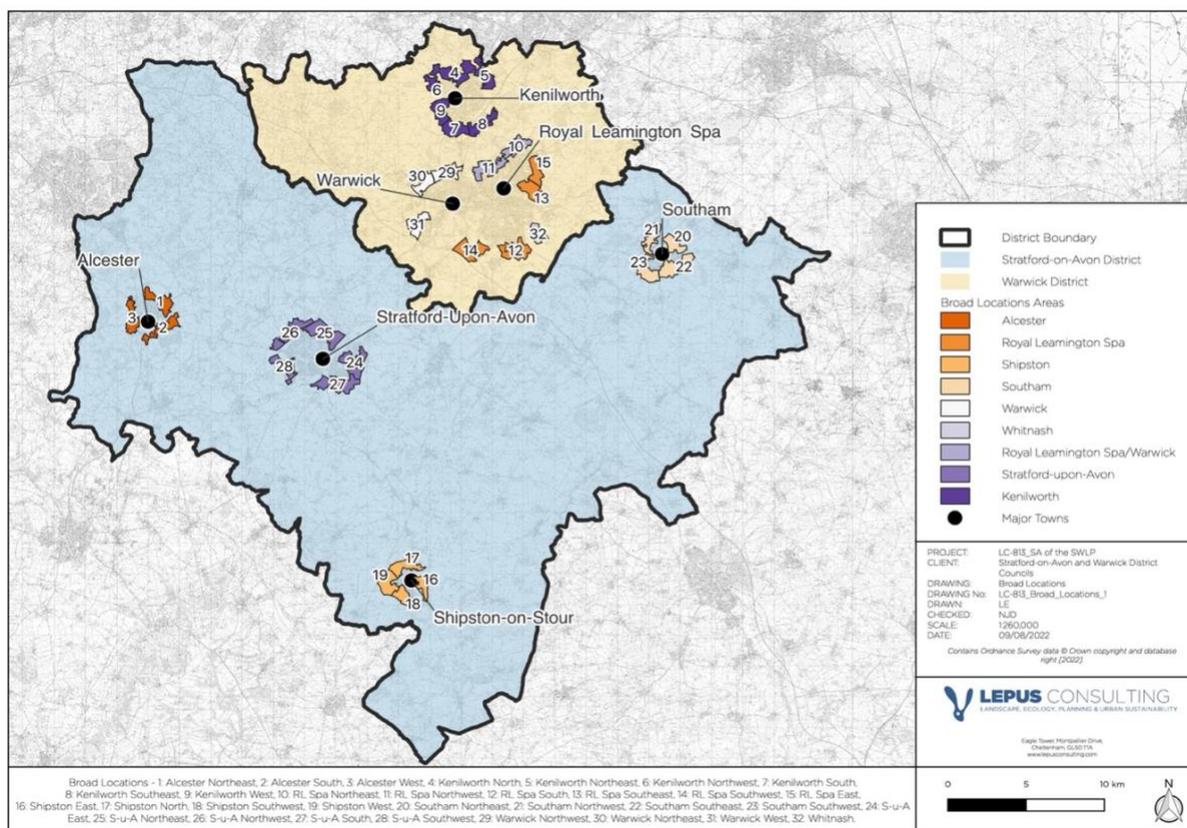


Figure N. 7: Map illustrating the Broad Locations

N54. **Table N.6** summarises the assessment findings for the Broad Locations under each SA Objective. It is important to note that each Objective is composed of a number of indicators, as set out in the SA Framework in **Appendix A** of the Main Report. The assessment of each indicator cannot be ‘added’ to create an overall score as this would be give a misleading indication of the level of impacts and the potential for mitigation. The summary table illustrates the worst performing indicator under each Objective. **Appendix B** of the Main Report provides detailed assessments of each indicator under each SA Objective for the Broad Locations.

Table N. 6: SA performance of the Broad Locations: Summary assessments

Broad Locations	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Alcester Northeast	--	0	-	-	--	-	--	--	++	-	-	+	+
Alcester South	--	0	-	-	-	-	--	--	++	-	-	+	+
Alcester West	--	0	-	-	-	-	--	--	++	-	-	+	+
Kenilworth North	--	+	--	-	--	-	--	--	++	-	++	+	+
Kenilworth Northeast	--	+	-	-	--	-	--	--	++	-	-	+	+
Kenilworth Northwest	--	+	-	-	--	-	--	--	++	-	-	-	+
Kenilworth South	--	0	-	-	--	-	--	--	++	-	+	-	+
Kenilworth Southeast	--	+	-	-	--	-	--	--	++	-	-	-	+
Kenilworth West	--	+	-	-	--	-	--	--	++	-	-	-	+
Royal Leamington Spa East	--	+	-	-	-	-	--	--	++	-	-	+	+
Royal Leamington Spa Northeast	--	+	-	-	-	-	--	--	++	-	-	+	+
Royal Leamington Spa Northwest	--	+	-	-	-	-	--	--	++	-	-	+	+
Royal Leamington Spa South	--	+	-	-	--	-	--	--	++	-	-	-	+
Royal Leamington Spa Southeast	--	+	--	--	--	-	--	--	++	++	+	+	+
Royal Leamington Spa Southwest	--	0	-	-	--	-	--	--	++	-	-	-	+
Shipston East	--	0	-	--	-	-	--	--	++	-	-	-	+
Shipston North	--	+	-	--	-	-	--	--	++	-	-	-	+
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Warwick Northeast	--	+	-	-	-	-	--	--	++	-	-	-	+
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Warwick West	--	0	-	-	-	-	--	--	++	-	--	-	+
Whitnash	--	+	--	-	-	-	--	--	++	-	-	+	+

- N55. A summary of the SA findings for the Broad Locations is set out in the following points:
- **Flood risk:** Areas of higher flood risk (Flood zones 2 and 3) have largely been avoided in the identification of locations and the impacts of increased flood risk are likely to be negligible.
  - **Biodiversity:** All locations are in proximity to a Local Wildlife Site (LWS) and three BLs are coincident with a Local Nature Reserve (LNR).
  - **Landscape:** Many Broad Locations are within sensitive landscapes and Broad Locations at Shipton on Stour may have impacts on the AONB.
  - **Cultural heritage:** All locations have potential impacts on cultural heritage.
  - **Environmental pollution:** All locations have a potential minor adverse effect on environmental pollution.
  - **Natural resources:** All locations could result in a significant loss of Best and Most Versatile agricultural land.
  - **Health:** Over half of the Broad Locations are within the target distance to an existing GP surgery and a leisure centre and many Broad Locations lie outside an Air Quality Management Area, except in Stratford and north Kenilworth. All Broad Locations have good access to greenspace.
  - **Accessibility:** Most Broad Locations have access to an existing bus stop and 16 have good access to a train station. Mixed effects have been identified in relation to the accessibility of the Broad Location to the existing settlement.
  - **Education:** 31 Broad Locations are in proximity to a primary school and 23 have good access to a secondary school.
  - **Employment:** All BLs are in proximity to opportunities for employment.
- N56. All Broad Locations perform similarly against the climate change objective. Large scale residential-led development is likely to result in an increase in Greenhouse Gas emissions. Development of up to 2,000 dwellings could increase carbon emissions in the Local Plan area by more than 1% of the existing CO<sub>2</sub> emission levels and result in a major adverse impact.
- N57. All Broad Locations could deliver up to 2,000 dwellings and could increase waste in the Plan area by more than 1%. The 1% principle is limited and only a coarse precautionary indicator. All locations perform in the same way and will lead to significant increases in waste.
- N58. All Broad Locations perform very well against SA Objective 9 as all locations would deliver residential-led developments and a net gain of up to 2,000 houses to be expected. This would contribute significantly to local housing needs and would be a major positive impact on housing provision.

#### Reasonable alternatives: Small Settlement Locations

- N59. A total of 22 reasonable alternative development locations have been identified around the following small settlements:

- |   |   |
|---|---|
| <ul style="list-style-type: none"><li>• Barford</li><li>• Bearley</li><li>• Bidford</li><li>• Bishop's Tachbrook</li><li>• Claverdon</li><li>• Cubbington</li><li>• Earlswood</li><li>• Hampton Magna</li><li>• Hatton Park</li><li>• Hatton Station</li><li>• Henley</li></ul> | <ul style="list-style-type: none"><li>• Kineton</li><li>• Kingswood</li><li>• Long Itchington</li><li>• Radford Semele</li><li>• Salford Priors</li><li>• South Coventry</li><li>• Studley</li><li>• Wellesbourne</li><li>• Wilmcote</li><li>• Wood End</li><li>• Wootton Wawen</li></ul> |
|---|---|

N60. The initial list of 22 settlements to be considered was provided by the SWLP team. The locations are shown on **Figure N.8**. Lepus identified a study area for assessment surrounding each settlement based on the following criteria:

- 50% should be within 400m of the settlement edge.
- 50% should be within 800m of at least one of the following services: public transport (train station or bus station), GP surgery, a primary school, a local shop and/or publicly accessible green space.
- Land with the following constraints was excluded from the assessment location: Flood Zones 2 or 3, Areas of Outstanding Natural Beauty, Grade 1 agricultural land, Scheduled Monuments, Sites of Special Scientific Interest, Registered Parks and Gardens and Ancient Woodland.

N61. The small settlement locations seek to accommodate between 50 and 500 units at a dwelling per hectare scale of 35dph. Housing to green space for green infrastructure should operate on a ratio of 60:40 of the total area. In other words, at least 40% of the land area should be planned for the provision of GI.

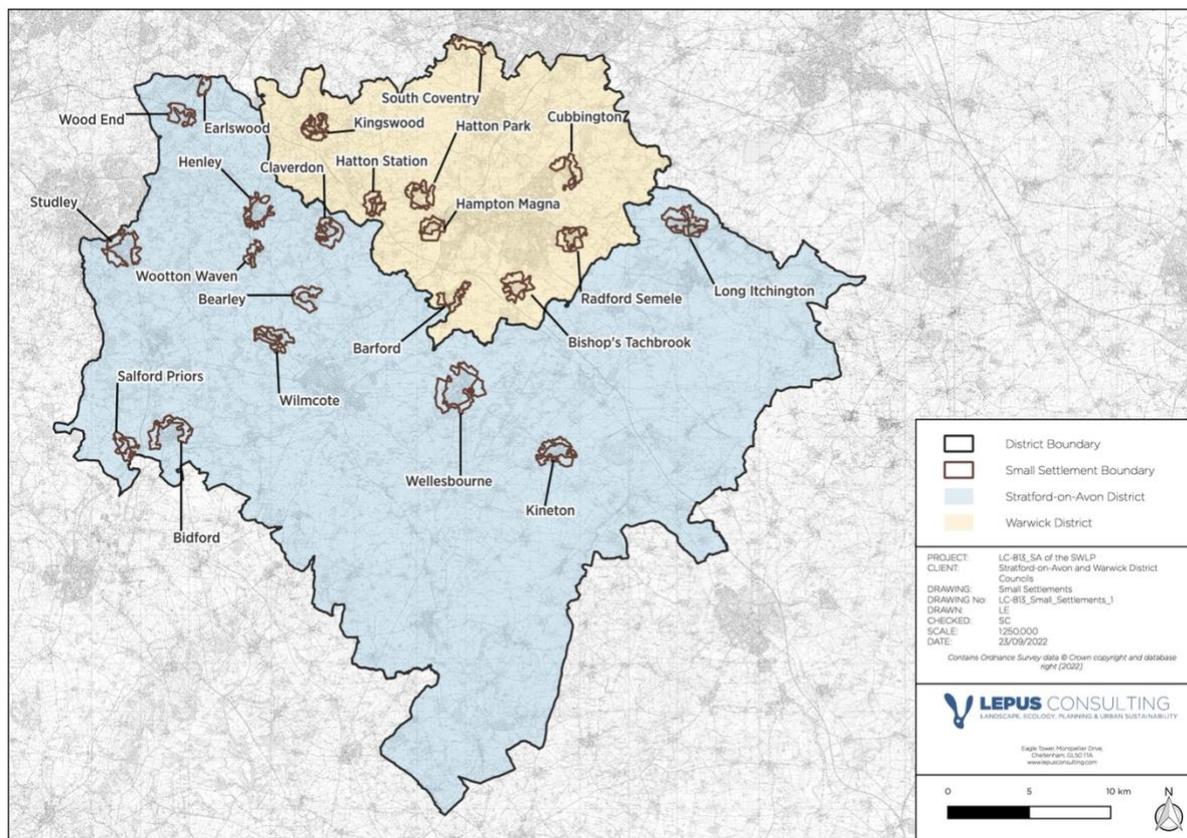


Figure N.8: Map illustrating the Small Settlement Locations

### Summary of SA findings for Small Settlement Locations

N62. **Table N.7** summarises the sustainability performance of each Small Settlement Location under each SA Objective. It is important to note that each Objective is composed of a number of indicators, as set out in the SA Framework in **Appendix A**. The assessment of each indicator cannot be ‘added’ to create an overall score as this would be give a misleading indication of the level of impacts and the potential for mitigation. The summary table illustrates the worst performing indicator under each Objective. **Appendix C** of the Main Report provides detailed assessments of each indicator under each SA Objective.

Table N. 7: SA performance of the Small Settlement Locations: Summary assessments

Small Settlement	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Barford	-	0	-	--	-	-	--	-	++	-	-	-	+
Bearley	-	+	--	--	-	-	--	-	++	-	-	-	+
Bidford	-	0	-	-	-	-	--	-	++	-	-	-	+
Bishop's Tachbrook	-	0	-	--	-	-	--	-	++	-	-	-	+
Claverdon	-	+	-	--	-	-	--	-	++	-	-	-	+
Cubbington	-	0	-	--	-	0	--	-	++	-	-	-	+
Earlswood	-	+	-	--	-	0	--	-	++	-	-	-	+
Hampton Magna	-	+	-	--	-	-	--	-	++	-	++	-	+
Hatton Park	-	0	-	--	-	-	--	-	++	-	-	-	+
Hatton Station	-	0	-	--	-	-	--	-	++	-	-	-	+
Henley	-	0	-	--	-	-	--	-	++	-	-	-	+
Kineton	-	0	-	--	--	-	--	-	++	-	++	+	+
Kingswood	-	0	-	--	-	-	--	-	++	-	++	-	+
Long Itchington	-	0	-	--	-	-	--	-	++	-	-	-	+
Radford Semele	-	0	-	--	-	-	--	-	++	-	-	+	+
Salford Priors	-	0	-	--	-	-	--	-	++	-	-	-	+
South Coventry	-	+	-	--	-	-	--	-	++	-	-	-	+
Studley	-	0	-	--	-	-	--	-	++	-	-	-	+
Wellesbourne	-	0	-	--	-	-	--	-	++	-	-	-	+
Wilmcote	-	0	--	--	-	-	--	-	++	-	-	-	+
Wood End	-	0	--	--	-	-	--	-	++	-	++	-	+
Wootton Wawen	-	0	-	--	-	-	--	-	++	-	++	-	+

N63. A summary of the SA findings for the Small Settlement Locations is set out below:

- **Flood risk:** Flood zones have largely been avoided in the identification of locations. Impacts would be negligible.

- **Biodiversity:** Many locations are in proximity to a Site of Special Scientific Interest (SSSI) and ancient woodland. Three are coincident with a SSSI. All locations are in close proximity to a LWS.
- **Landscape:** All locations are within sensitive landscapes.
- **Heritage:** All locations have potential impacts on cultural heritage.
- **Environmental pollution:** Small settlements Cubbington and Earlswood are the only locations which have been assessed as having a negligible impact on pollution, with all other small settlements likely to have some adverse impacts.
- **ALC:** All locations could result in loss of Best and Most Versatile agricultural land.
- **Health:** Barford, Bishop's Tachbrook, Hampton Magna, Hatton Park, and Studley largely meet the target distance to an A&E department. Eleven locations are within the target distance to an existing GP surgery. All locations, except South Coventry, lie outside an AQMA.
- **Accessibility:** Many locations have access to a bus stop and 12 have good access to a train station. Mixed effects have been identified in relation to accessibility to the existing settlement.
- **Primary schools:** 17 locations are in proximity to a primary school
- **Education:** Many locations are not in proximity to a secondary school.

N64. All small settlement locations perform similarly against the climate change objective. This scale of residential-led development is likely to result in an increase in Greenhouse Gas emissions. Development of up to 50-500 dwellings could increase carbon emissions in the Local Plan area by less than 1% of the existing CO<sub>2</sub> emission levels and result in a minor adverse impact.

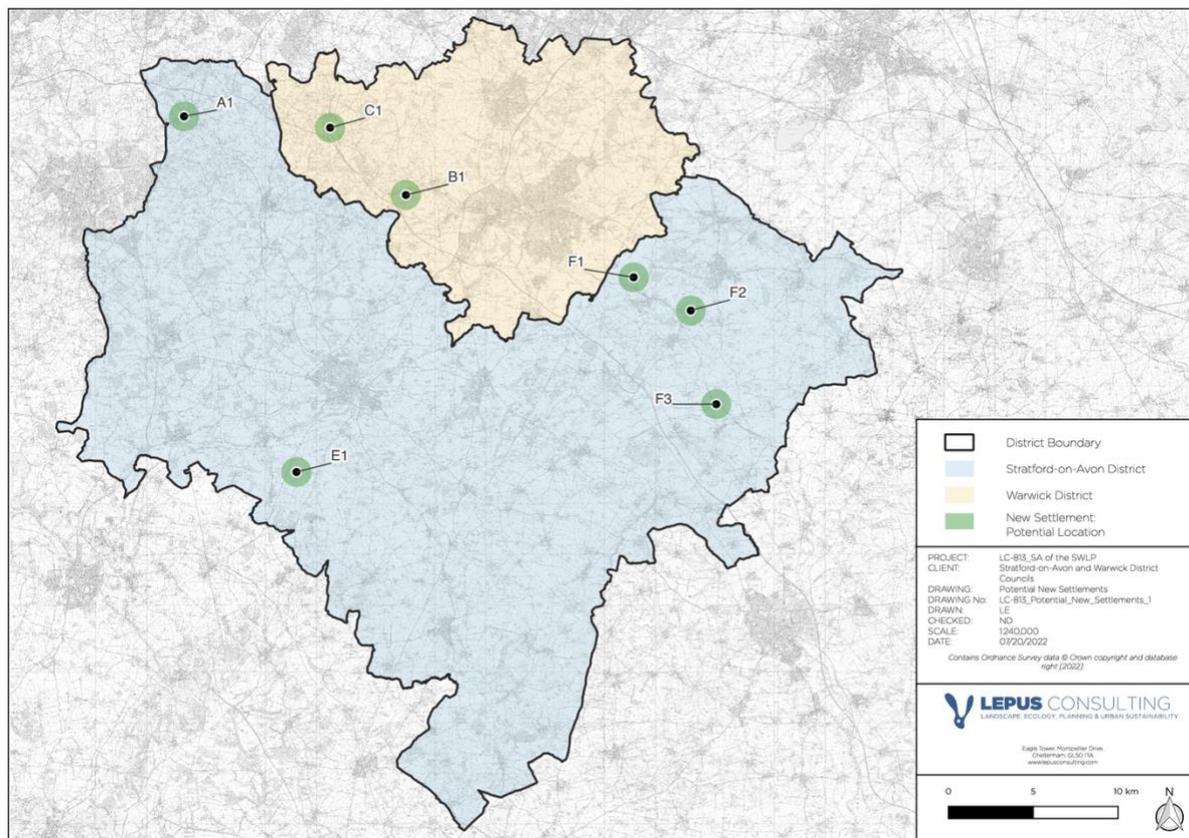
N65. All small settlement locations could deliver up to 50-500 dwellings and could increase waste in the Plan area by less than 1%. The 1% principle is limited and only a coarse precautionary indicator. All locations perform in the same way and will lead to increases in waste.

N66. All small settlement locations perform very well against SA Objective 9 as all locations would deliver residential-led developments with a net gain of up to 50-500 houses to be expected. This would contribute significantly to local housing needs and would result in a major positive impact on housing provision.

### New Settlements

N67. The Councils have been considering the potential to meet housing need through the creation of a new settlement/s. Following the Councils' initial assessment, seven potential locations were identified, as set out in the Issues and Options Consultation document. The locations are shown on **Figure N.9**.

N68. At this stage, the sustainability performance of the locations has been assessed without considering the potential to mitigate impacts, for example, through the provision of new infrastructure such as schools, shops, community facilities and transport improvements. The Councils will continue to work with infrastructure providers throughout the plan-making process to establish need and consider the feasibility of delivering new infrastructure.



**Figure N.9:** Map illustrating the New Settlement Locations

N69. Each potential new settlement location is approximately 250ha and would be located within proximity to existing or former railway lines. The seven potential settlement locations are distributed across the Plan area, with two locations in Warwick and five located in Stratford-on-Avon.

- The majority of the new settlement locations perform well or reasonably against cultural heritage indicators;
- All new settlements performed strongly against housing and economy;
- The majority of new settlements performed well for connectivity to railways, access to greenspace and access to public rights of way and cycle networks;
- All new settlements perform poorly against climate change (overall) and waste;
- Most new settlements perform poorly against natural resources and landscape;
- There was variation in the performance of the new settlements against flood risk, pollution, health, education and biodiversity; and
- All new settlements are likely to adversely impact LWSs and some new settlements are likely to adversely impact SSSIs.

N70. All new settlements perform similarly against the climate change objective. Large scale residential-led development is likely to result in an increase in Greenhouse Gas emissions. Development of up to 6,000 dwellings could increase carbon emissions in the Local Plan area by more than 1% of the existing CO<sub>2</sub> emission levels and result in a major adverse impact.

- N71. All new settlements could deliver up to 6,000 dwellings and could increase waste in the Plan area by more than 1%. The 1% principle is limited and only a coarse precautionary indicator. All locations perform in the same way and will lead to significant increases in waste.
- N72. All new settlements perform very well against SA Objective 9 as all locations would deliver residential-led developments and a net gain of up to 6,000 houses to be expected. This would contribute significantly to local housing needs and would be a major positive impact on housing provision.
- N73. All new settlements would be expected to result in a permanent loss of ALC Grade 3 or above soils following development.
- N74. All new settlements would be expected to positively impact the access of site end users to employment opportunities.

### Summary of findings for the potential New Settlement Locations

- N75. **Table N.8** summarises the assessment findings for the New Settlement locations for each SA Objective. It is important to note that each Objective is composed of a number of indicators, as set out in the SA Framework in **Appendix A** of the Main SA Report. The assessment of each indicator cannot be 'added' to create an overall score as this would give a misleading indication of the level of impacts and the potential for mitigation. The summary table illustrates the worst performing indicator under each Objective. **Appendix D** of the Main SA Report provides detailed assessments of each indicator under each SA Objective.

Table N. 8: SA performance of the New Settlement Locations: Summary assessments

New Settlements	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
A1	-	-	+	-	-	-	-	-	++	-	-	-	+
B1	-	-	+	-	-	-	-	-	++	-	-	-	+
C1	-	-	+	-	-	-	-	-	++	-	-	-	+
E1	-	-	-	-	0	-	-	-	++	-	-	-	+
F1	-	-	+	-	-	-	-	-	++	-	-	-	+
F2	-	-	-	-	-	-	-	-	++	-	-	-	+
F3	-	-	-	-	-	-	-	-	++	-	-	-	+

### Reasonable alternatives: Policy options

- N76. A range of policy options for consideration have been identified by the Councils, as part of the Issues and Options Consultation for the emerging Local Plan. The policy options

include those for delivering the area's economic and housing needs as well as covering various development management aspects. The assessments have identified the best performing option for each policy where possible. In some circumstances it is recommended that a combination of options could potentially result in the most sustainability benefits.

#### Delivering South Warwickshire's Economic Needs

- N77. Considering the location of SWLP area and its objectives for economic growth, the policy options consider greening, diversifying and sustaining the local economy. The policy options also address protecting and leveraging on the region's unique assets and building upon new investment sites. The policy options for the economy had positive impacts upon many SA Objectives, except for the ones pertaining to climate change, landscape, pollution and cultural heritage.

#### Delivering Homes That Meet the Needs of All Our Communities

- N78. Addressing homelessness and affordability issues, the housing policy options range from housing needs and space standards to custom plots, and pitches and plots for gypsies, travellers and showpeople. Most of the policy options were favourable in regard to the health and wellbeing of the people living, visiting or working in the Plan area. Some uncertainty or minor negative effects were identified with regard to waste.

#### A Climate Resilient and Net Zero South Warwickshire

- N79. In alignment with the target to reach net zero by 2050 and declaration of a climate emergency in 2019 by both the Councils, the policy options seek to deliver reduced Greenhouse Gas emissions in the business, housing and transport sectors. The policy options presented are set out as 'having a climate change policy' which could have positive impacts on certain SA Objectives, whereas the lack of a climate change policy (as recommend in some policy options) could be detrimental for the plan area in the long run.

#### A Healthy, Safe and Inclusive South Warwickshire

- N80. In alignment with NPPF's policies for healthy, safe and inclusive places, the policy options for SWLP cater to pollution, Health Impact Assessments and having an overall policy on health. Options that favour having a policy would have positive impacts on SA Objectives, as opposed to the options that do not favour them.

#### A Well-Designed and Beautiful South Warwickshire and A Well Connected South Warwickshire

- N81. The policy options for strategic design policy, protecting and enhancing heritage assets have been considered in conjunction with the 20-minute neighbourhoods and other connectivity matters. The option to have no policies covering connectivity and accessibility could potentially have a negative impact on SA objectives pertaining to climate change and pollution, as opposed to options that recommend having a policy.

#### A Biodiverse and Environmentally Resilient South Warwickshire

- N82. With the objective to strengthen green and blue infrastructure and achieve Biodiversity Net Gain, the policy options may lead to positive outcomes across a range of SA Objectives beyond environmental benefits, including, economy, flooding and health and wellbeing.

- N83. Options that recommend having policies for areas of restraints, to protect special landscapes and achieve environmental net gain have positive impact on several SA objectives.

### Summary

- N84. All reasonable alternatives have been evaluated using a wide range of receptors, sources and indicators. The likely impacts from development at different scales have been estimated and the results provide some idea, initially, about how different reasonable alternatives will perform in terms of sustainable development.
- N85. There are limitations to the assessment process and assumptions have been stated in the methodology section (see **Chapter 2** of the Main SA Report). Notwithstanding these, it is now possible to consider some of the results and what should be considered as the plan making moves into a key stage of public consultation.
- N86. The Councils will now assimilate the information and incorporate this into the next round of consultation before making decisions on selection and rejection. It is a requirement to identify the best performing reasonable alternatives, which has been set out in the preceding chapters. Public consultation will help clarify the status of these best performing options which have been identified using an extensive analysis of secondary data.

### Further Research

- N87. The following additional research is recommended to better inform the SA of the SWLP:
- Biodiversity assessments of the Broad Locations;
  - Landscape Assessment to explore character, sensitivity and capacity at the BLs;
  - Air Quality impact assessment at the plan level; and
  - Cultural Heritage evaluation at the Broad Location scale.



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