

# STRATFORD-ON-AVON SITE ALLOCATIONS PLAN (SAP): Preferred Options

Sustainability Appraisal (SA) Report incorporating Strategic Environmental Assessment (SEA)

August 2020



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### August 2020

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#### **CONTENTS**

Page

**NON-TECHNICAL SUMMARY** (available separately https://www.stratford.gov.uk/planning-regeneration/)

1	INTRODUCTION	
	Sustainability Appraisal (SA) & Strategic Environmental Assessment (SEA) The Stratford-on-Avon Core Strategy & Site Allocations Plan (SAP) Inter-Relationships between SA & Plan-Making Processes Consultation: Statutory, Public & Stakeholder Engagement Compliance with SEA Directive & Regulations Habitats Regulations Assessment (HRA) Structure of the SA Report	1 4 7 8 8 9
2	STRATEGIC ENVIRONMENTAL ASSESSMENT & SUSTAINABILITY APPRAISAL METHODS	
	Introduction and the SA/SEA Process Scoping and the SA/SEA Framework Updating the SA Framework (2020) Appraising the Stratford-on-Avon Site Allocations Plan: Revised Scoping (2017)	11 11 12 31
	Appraising the Stratford-on-Avon Site Allocations Plan: Options for Reserve Housing Sites (2019-2020) Appraising the Stratford-on-Avon Site Allocations Plan: Scenarios X-Y, A-H & Scenarios 1-5 (2020)	32 34
	Appraising the Stratford-on-Avon Plan: Preferred Options Implementation of the Plan Consultation	34 34 34
3	SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERSITICS	
	Introduction Review of Plans & Programmes (PP); Baseline Conditions Key Sustainability Issues, Problems and Opportunities Likely Evolution of Baseline Conditions without the SAP	37 37 39 41
4	CONSIDERATION OF PLAN-MAKING OPTIONS & ALTERNATIVES IN SA/SEA	
	Assessment of Alternatives in SA Options in Plan-Making Options for the Site Allocations Plan (SAP) Defining Settlement Boundaries Scale of Reserve Sites Proposals for Specific Sites Options for Housing Numbers – Scenarios X-Y	43 44 45 45 46 46 47

i

	Options for Identifying Reserve Sites – Scenarios A-H Options for Reserve Housing Sites - Sites Options for Identifying Reserve Sites – Scenarios 1-5 Options for Large Rural Sites Self-Build & Custom Housebuilding Options SB1-SB5 The Do-Nothing Scenario	47 48 48 50 57 58
5	DEVELOPING THE SITES ALLOCATION PLAN (SAP) (2017-2020)	
	Context & Developing the Plan (2017, 2018, 2019 & 2020) Representations to the SA Reports & SA Addendum (2017, 2018 & 2019)	59 59
	Defining Settlement Boundaries (BUABs)	61
	Scale of Reserve Housing Sites (2018 & 2020) Proposals for Specific Sites (2017, 2018 & 2020)	64 66
	Developing the Proposed Approach to Identifying Reserve Housing Sites (2020)	70
	Specific site Proposals – Base Scenario	70
	Options for Identifying Reserve Housing Sites Scenarios A-H	72
	Options for Identifying & Releasing Reserve Sites Scenarios 1-5	77 82
	Developing the Approach for Self-Build & Custom Housebuilding	OZ
6	THE SITES ALLOCATION PLAN (SAP): PREFERRED OPTIONS (Regulation 18 Consultation October 2020)	
	Identifying & Releasing Reserve Housing Sites Policies SAP.1-SAP.5 Self-Build & Custom Housebuilding Policy SAP.6 Built-Up Area Boundaries (BUABs) Policy SAP.7 Employment Enabling Sites Policy SAP.8 A46 Safeguarding Policy SAP.9 Specific Sites Proposals SUA.2, SUA.4-8, BID.1, STUD.1-2, RURAL1-5 SA of Implementing the Sites Allocation Plan (SAP)	85 107 111 111 112 112 124
7	PROPOSED MONITORING	
	Proposed Monitoring	129
8	CONSULTATION & NEXT STEPS	
	Consultation & Next Steps	130

#### **APPENDICES**

- I Statement of Compliance with SEA Directive & Regulations
- II Stratford-on-Avon Site Allocations Plan SA Scoping Report (2014) available separately (<a href="https://www.stratford.gov.uk/planning-regeneration/">https://www.stratford.gov.uk/planning-regeneration/</a>)
- SA of Options for Defining Settlement (Built Up Area) Boundaries (BUABs) (December 2017)
- SA of Proposals for Specific Sites (December 2017, updated June 2019 & July 2020)
- V SA of Further Proposals SA Addendum Report (February 2019) available separately (<a href="https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan.cfm?frmAlias=/siteallocations/">https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan.cfm?frmAlias=/siteallocations/</a>)
- VI Representations to previous Consultations (2017, 2018, 2019)
- VII VIIa SA of Scenarios X-Y (Housing Numbers) & VIIb SA of Scenarios A-H (Housing Distribution)
- VIII SA of Options (Amber Sites) for Reserve Housing Sites (available separately)
- IX SA of Scenarios 1-5 (Distribution with Amber Sites)
- X SA of Scenarios SB1-SB5 for Self-Build & Custom Housebuilding
- XI SA of Preferred Approach to Identifying Reserve Housing Sites
- XII Policy SAP.1 Self-Build & Custom Housebuilding (Va) and Options for Identified Sites in the SAP (Vb) (December 2017, updated June 2019 & August 2020)

	TABLES	
1.1	The Stratford-on-Avon SAP with SA Stages and Documents	7
2.1	The SA Framework	14
2.2	Categories of Significance of Likely Effects	31
2.3	Outline Approach to Assessing Site Options	33
3.1	Key Sustainability Issues, Problems & Opportunities	40
4.1	Options for Defining Built-Up Area Boundaries (BUABs)	45
4.2	Options for Scale of Reserve Housing Sites – Scenarios X-Y	46
4.3	Options for Strategy for Reserve Sites – Scenarios A-H	47
4.4	Options for Strategy for Reserve Sites – Scenarios 1-5	48
4.5	Options for Large Rural Sites (LRSs)	50
5.1	Strategic Options for Defining BUABs – SA Summary	61
5.2	Scenarios X &Y – SA Summary	65
5.3	Proposed Specific Sites – SA Summary (2017)	67
5.4	Additional Specific Proposals – SA summary (2019)	69
5.5	Base Scenario – Proposed Specific Sites	70
5.6	Base Scenario – SA Summary	71
5.7	Scenarios A-H – Strategic SA Summary	72
		73
5.8	Scenarios 1-5 – Strategic SA Summary	78
5.9	Scenarios 1-5 – Outline Reasons for Rejection or Selection	80
5.10	Scenarios SB1-SB5 – SA Summary	82
6.1	Policies SAP.1-SAP.5 – Reserve Housing Sites	85
6.2	Progression of Amber Sites into Policy SAP.1 Annex 1 – outline reasons	88
6.3	SAP Preferred Approach to Identifying & Releasing Reserve Housing	93

#### Stratford-on-Avon Site Allocations Plan: Preferred Options Sustainability Appraisal Report

	Sites to 2031 – SA Summary	
6.4	SAP.1 Annex 1 Reserve Housing Sties – SA Summary	100
6.5	Self-Build & Custom Housebuilding SAP.6 Site Allocations SCB.1-	109
	SCB.9	
6.6	Specific Sites – Dates for SA	112
6.7	Specific sites Proposals – SA Summary	123
6.8	Implementation of SAP – SA Summary	128

	FIGURES	
4.1	Hierarchy of Alternatives in SA/SEA & Options in Plan-Making	43

**NON-TECHNICAL SUMMARY** (available separately https://www.stratford.gov.uk/planning-regeneration/)

#### 1.0 INTRODUCTION

### Sustainability Appraisal (SA) & Strategic Environmental Assessment (SEA)

- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. Its purpose 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. Stratford-on-Avon District Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process (incorporating SEA) of the Stratford-on-Avon District Site Allocations Plan (SAP).
- 1.2 This requirement for SA is in accordance with planning legislation<sup>1</sup> and paragraph 32 of the National Planning Policy Framework (NPPF, 2019)<sup>2</sup>. Local Plans must also be subject to Strategic Environmental Assessment<sup>3</sup> (SEA) and Government advises<sup>4</sup> that an integrated approach is taken so that the SA process incorporates the requirements for SEA and to the same level of detail, ensuring that potential environmental effects are given full consideration alongside social and economic issues.

#### The Stratford-on-Avon Core Strategy & Site Allocations Plan (SAP)

- 1.3 Stratford-on-Avon District Council is preparing several local planning documents<sup>5</sup> that will shape development and manage land in the Stratford District area. This includes the Core Strategy, a Site Allocations Plan, a Gypsy & Traveller Local Plan, and the Community Infrastructure Levy. Along with Neighbourhood Plans prepared by town or parish councils, and the Minerals and Waste Local Plans prepared by Warwickshire County Council, these plans form the statutory Local Plan for Stratford-on-Avon District. These documents are also supported by several Supplementary Planning Documents (SPDs)<sup>6</sup>.
- 1.4 The overarching planning document for the Stratford-on-Avon District is the Core Strategy, adopted in July 2016. This sets out the Spatial Vision and Strategic Objectives for the District area 2011-2031. Core Strategy Policies

<sup>1</sup> S19(5) of the 2004 Act & Reg 22(a) of the Town & Country Planning (Local Planning) (England) Regulations 2012

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

<sup>&</sup>lt;sup>3</sup> EU Directive 2001/42/EC, and, Environmental Assessment of Plans and Programmes Regulations, 2004

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

<sup>&</sup>lt;sup>5</sup> https://www.stratford.gov.uk/planning-regeneration/planning-policy.cfm

<sup>6</sup> https://www.stratford.gov.uk/planning-regeneration/supplementary-planning-documents-spds.cfm

CS.1-14 explain the sustainable development framework, the District Resources, and the District Designations with policies to guide and manage development. The Development Strategy sets out Core Strategy Policies (CS.15-24) with requirements for development, including explanations, development management considerations, implementation and monitoring; also CS.25-27 provides guidance and requirements regarding infrastructure and developer contributions. Area Strategies (AS.1-AS.11) provide Policies and Proposals for the Main Town (Stratford-upon-Avon), the Main Rural Centres, New Settlements, Countryside & Villages, Large Rural Brownfield Sites, and two Proposals to meet the needs of Redditch.

- 1.5 The Core Strategy Vision states that at least 14,600 homes will have been delivered across the District, and that at least 35ha of employment land will have been provided, as well as 19ha to meet the needs of Redditch. There are sixteen Strategic Objectives that represent the key delivery outcomes that the Core Strategy should achieve by 2031. These address the need for development in the District, but aim to protect the historic and natural environment, and the character of the Stratford District. The Core Strategy was subject to a Sustainability Appraisal (SA) that informed the preparation of the Core Strategy. The SA Report was examined alongside the Core Strategy and other supporting evidence and found sound.
- 1.6 The original intention for the Site Allocations Plan (SAP)<sup>7</sup>, as identified by the Council in its original Scoping Document in 2014, was to identify additional sites for housing development that would supplement the strategic sites identified in the Core Strategy. However, sufficient housing provision has now been made in the Core Strategy and through planning permissions to meet the housing requirement as identified for the current plan period to 2031. Therefore, the focus of the SAP is now on the identification of reserve sites in accordance with Policy CS.16 in the Core Strategy. Such sites will only be released selectively if one or more of the circumstances identified in Part D of that Policy apply.
- 1.7 The SAP identifies Built-Up Area Boundaries (BUABs) for a wide range of settlements in accordance with Policy CS.15 of the adopted Core Strategy. However, it is not intended to identify BUABs for those settlements that are covered in Neighbourhood Plans that have been 'made' or reached an advanced stage in their production. The SAP identifies Reserve Housing Sites in accordance with Policy CS.16.D and Policy CS.15 of the Core Strategy. Policy CS.16 requires the SAP to identify reserve housing sites capable of accommodating any potential short-fall, calculated at 20% of the overall housing requirement (around 2,920 homes). The SAP includes an approach in relation to a number of specific sites, and also a new provision for Self-Build and Custom Housebuilding in line with recent Regulations<sup>8</sup>.
- 1.8 A Revised Scoping & Initial Options SAP document (January 2018)<sup>9</sup> was developed to take account of the changed and updated situation since the

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<sup>&</sup>lt;sup>7</sup> https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan.cfm

<sup>8</sup> https://www.gov.uk/guidance/self-build-and-custom-housebuilding

<sup>&</sup>lt;sup>9</sup> https://www.stratford.gov.uk/planning-regeneration/sap-revised-reg-18-scoping-consultation.cfm

original scoping in 2014. This revised SAP scoping document comprised four parts as follows:

- Part 1 Approach to identifying Reserve Housing Sites
- Part 2 Definition of Settlement (Built-Up Area) Boundaries
- Part 3 Proposed approach towards Specific Sites
- Part 4 Self-Build and Custom Housebuilding

Appendices A-E presented the proposed BUABs for the Main Rural Centres and the Local Service Villages not already covered by 'made' or well advanced Neighbourhood Plans. Appendix F presented the location plans of the specific sites covered in Part 3. Appendix G relates to Part 4 and presented the location plans for three sites that have already been put forward by landowners/developers for this specific purpose.

- 1.9 This Revised Scope & Initial Options for the SAP was published for consultation in February 2018 under Regulation 18. Comments made during the 6-week consultation period informed the development of the SAP. Since that earlier consultation, additional specific proposals emerged that the Council considered are appropriate to include in the SAP, as follows:
  - Birthplace/Gateway Cultural Quarter
  - Quinton Rail Technology Centre
  - A46 Safeguarding: A422 Wildmoor, A3400 Bishopton, & A439 Marraway
  - Employment Exception Sites

These proposals were published<sup>10</sup> for public consultation for 6 weeks in February 2019 and comments made informed the further development of the SAP.

1.10 In 2019, the Proposed Submission draft SAP (July 2019) accompanied by the SA Report (June 2019) was subject to public consultation<sup>11</sup> for the period 8 August to 15 October 2019. As a result of the representations received through this consultation, the Council decided to undertake further work – in particular investigating strategic options for determining the preferred approach that would be applied to identifying and releasing reserve sites. The SA has an important role to help identify and refine reasonable alternatives – and this is explained further in Section 4 of this SA Report. As a result of the further studies, including strategic SAs of numbers of scenarios, the Council has decided to consult again with a Preferred Options (POs) draft Plan.

<sup>10</sup> https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan.cfm?frmAlias=/siteallocations/

<sup>11</sup> https://www.stratford.gov.uk/planning-building/site-allocations-plan.cfm

#### 1.11 The SAP (Preferred Options) comprises the following:

#### 1 Introduction

#### 2 Reserve Housing Sites

Policy SAP.1 Identifying Reserve Housing Sites

Policy SAP.2 Reserve Sites in Neighbourhood Plans

Policy SAP.3 Releasing Reserve Housing Sites

Policy SAP.4 Releasing Reserve Housing Sites for Purpose D

Policy SAP.5 Applications for Reserve Housing Sites

Annex I Schedule of Reserve Housing Sites

Annex 2: Tranches of Sites

#### 3 Self-Build and Custom House Building

Policy SAP.6 Self-Build and Custom House Building Sites Proposals for Site Specific Self Build Allocations

#### 4 Built-Up Area Boundaries

Policy SP.7 Built-Up Area Boundaries

#### **5 Employment Enabling Sites**

Policy SAP.8 Employment Enabling Sites

#### 6 A46 Safeguarding

Policy SAP.9 A46 Safeguarding

#### 7 Specific Site Proposals

Proposal SUA.2 South of Alcester Road, Stratford upon Avon

Proposal SUA.4 Atherstone Airfield

Proposal SUA.5 East of Shipston Road, Stratford upon Avon

Proposal SUA.6 Stratford-upon-Avon Gateway

Proposal SUA.7 Rother Street/Grove Road/Greenhill Street, Stratford-upon-Avon

Proposal SUA.8 Land at Stratford-upon-Avon College, Alcester Road,

Stratford-upon-Avon

Proposal BID.1 Bidford Centre, Bidford-on-Avon

Proposal STUD.1 Studley Centre

Proposal STUD.2 High Street, Studley

Proposal RURAL.1 Napton Brickworks

Proposal RURAL.2 University of Warwick Wellesbourne Campus

Proposal RURAL.3 Quinton Rail Technology Centre, Long Marston

Proposal RURAL.4 Meon Vale (Former Engineer Resources Depot), Long Marston

Proposal RURAL.5 Long Marston Airfield

#### Inter-Relationships between SA & Plan-Making Processes

1.12 Sustainability Appraisal 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. As the plan develops, stages and tasks in the SA process may be revisited, updated or refreshed in order to take account of updated or new evidence as well as consultation

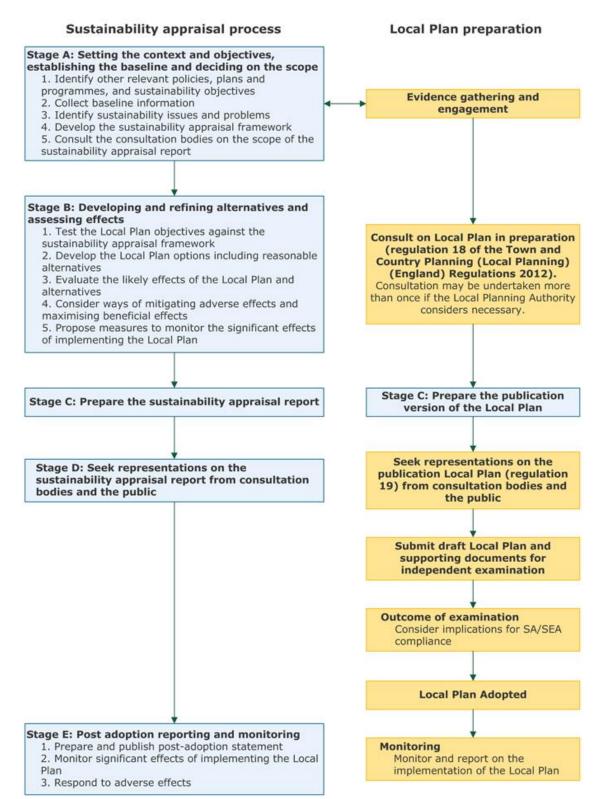
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representations. National Planning Practice Guidance<sup>12</sup> sets out the key stages and tasks for SA and their inter-relationships with planmaking stages and tasks – as set out in the diagram following:

soa276\_August 2020 5/131 Enfusion

<sup>12</sup> https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

Figure 1.1: SA and Plan-making Stages and Tasks



#### Consultation: Statutory, Public & Stakeholder Engagement

- 1.13 The Core Strategy was subject to appropriate consultation during its preparation and including formal requirements for notification and consultation under the Town & Country Planning Regulations 2012 and the SEA Regulations 2011. A consultation exercise was undertaken in Autumn 2014 regarding the intended scope of the SAP. At that time, it was envisaged that the main purpose of the SAP would be to identify non-strategic housing sites to supplement the strategic allocations identified in the Core Strategy to achieve the housing requirement for the District. In consideration of the time since the initial plan scoping and the significant change of circumstances regarding housing provision, the Council then proposed a revised scoping of the SAP in early 2018.
- 1.14 The SEA Regulations require that the SA/SEA scoping stage is subject to formal consultation with the statutory environmental bodies Environment Agency, Historic England, and Natural England. The SA Scoping Report (2014) for the Site Allocations Plan was sent for consultation to the statutory consultees Natural England, English Heritage (now Historic England) and the Environment Agency. Representations received on the draft SA Scoping Report were reviewed and responses made are set out in the appendix to the Final SA Scoping Report. The Final SA Scoping Report (December 2014) comprises part of this SA Report as Appendix II and is available separately on the Council's website<sup>13</sup>.
- 1.15 The emerging drafts of the SAP and accompanying SA reports are both subject to public and statutory consultation. Comments received are taken into account such that consultation continues in an iterative and ongoing way, and it is an important element of the SA/SEA process. The stages, documents and consultations on the plan-making and SA/SEA processes are summarised in the table following:

Table 1.1: SAP and SA/SEA Stages and Documents

SAP Stage and Documents	SA/SEA Stage and Documents		
Consultation	Consultation		
Stratford-on-Avon Council Website	Draft Sustainability Appraisal (SA)		
Call for Sites	Scoping Report June 2014		
Proposed Scope of the SAP	Sent to statutory consultees – EA, HE,		
	NE		
Consultation:	Consultation:		
September-October 2014	September-October 2014		
	Final SA Scoping Report		
	December 2014		
Revised Scope & Initial Options for the	Initial SA Report (December 2017)		
SAP			
Regulation 18 Consultation:	Consultation:		
February-March 2018	February-March 2018		

<sup>13</sup> https://www.stratford.gov.uk/doc/206738/name/SAP%20Sustainability%20Appraisal%20Scoping%20Report%20Dec %202014.pdf/

soa276\_August 2020 7/131 Enfusion

Further Focused Consultation on Specific	SA Addendum Report
Proposals	
Regulation 18 Consultation:	Regulation 18 Consultation:
February-March 2019	February-March 2019
Pre-Submission SAP (July 2019)	Pre-Submission SA Report (June 2019)
Regulation 19 Consultation	Consultation:
8 August – 15 October 2019	8 August – 15 October 2019
Preferred Options SAP (August 2020)	Preferred Options SA Report (August
Regulation 18 Consultation	2020)
Autumn 2020	Consultation autumn 2020
Pre-Submission SAP	Pre-Submission SA Report
Regulation 19 Consultation	Regulation 19 Consultation
Early 2021	Early 2021
Submission to the Secretary of State	SA Report Submission
Later 2021	Later 2021
Examination	Examination
Early 2022	Early 2022
Final document & Adoption of SAP	SA Adoption Statement

#### Compliance with SEA Directive & Regulations

1.16 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. The requirements for reporting the SEA process are set out in Appendix I of this Initial SA Report. Also, and in accordance with the SEA Directive, a Non-Technical Summary has been produced and is available separately.

#### Habitats Regulations Assessment (HRA)

- 1.17 The Council is also required to undertake a Habitats Regulations Assessment<sup>14</sup> (HRA) of the Stratford on Avon Local Plan, including the Site Allocations Plan. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any relevant site designated for its nature conservation importance. The HRA screening stage considers if the potential impacts arising as a result of the plan are likely to have significant effect on these sites either alone or in combination with other plans and projects. Summary HRA findings are incorporated into the SA Report.
- 1.18 The adopted Stratford-on-Avon Core Strategy was subject to HRA<sup>15</sup> during its preparation and HRA Reports published in April 2014 and August 2015. There are no European designated sites within the boundary of the District Council area. The previous HRAs investigated a number of designated sites around the 20 km distance. The HRA concluded that there would be no adverse

<sup>&</sup>lt;sup>14</sup> Conservation of Habitats & Species Regulations (as amended 2018) available at <a href="http://www.leaislation.gov.uk/uksi/2018/1307/pdfs/uksi">http://www.leaislation.gov.uk/uksi/2018/1307/pdfs/uksi</a> 20181307 en.pdf

<sup>&</sup>lt;sup>15</sup> https://www.stratford.gov.uk/planning-regeneration/sustainability.cfm

- effects from the Core Strategy on the integrity of these designated sites alone or in-combination with other plans and projects.
- 1.19 Since the Core Strategy HRA was completed and the Core Strategy adopted, Court Judgments<sup>16</sup> issued by the European Union in 2018 have changed the HRA methods employed in the UK. It is now not permissible to take account of measures (such as Plan Policies) intended to avoid or reduce the harmful effects of the plan or project on a European site at the screening stage; any designated sites screened as potentially at risk from the screening stage must be considered further through the appropriate assessment stage. The relevant environmental regulator has also prepared revised guidance<sup>17</sup> on HRA to take into account the implications of these CJEUs on UK HRA practice.
- 1.20 However, the Core Strategy has been shown to not have any adverse effects on the designated sites (more than 10 km distance) outside the District's boundary, and this includes Policy CS.15 & 16 on Reserve Housing Sites. There are strong mitigation measures provided by Core Strategy CS.6 Natural Environment this makes quite clear that developments that are likely to have an adverse effect either directly, indirectly or cumulatively, on a site designated through the EC Habitats Directive or Birds Directive will not be permitted. NE did not indicate any requirement for HRA in their consultation comments on the emerging SAP and SA. Therefore, it is considered that the Core Strategy and its' accompanying SAP will not have any adverse effects on designated sites, alone or in-combination with other plans or projects. It is not necessary to consider HRA any further.

#### Structure of the SA Report

- 1.21 This document reports the SA process for the Stratford on Avon Sites Allocations Plan (SAP). Following this introductory Section 1, this report is structured into the following sections:
  - Section 2: Describes the methods used to appraise the SAP
  - Section 3: Provides the sustainability context and characteristics of the Plan area relevant to the SAP
  - Section 4: Explains how options in plan-making and alternatives in SA have been addressed and reported explicitly to demonstrate compliance with the requirements of the SEA Regulations
  - Section 5: Summarises the development of the draft SAP through 2017, 2018, 2019 & into 2020 with the corresponding findings of the SA at each iteration of plan-making
  - Section 6: Summarises the findings of the SA of the SAP Preferred Options (August 2020)
  - Section 7: Introduces the approach to monitoring the SA
  - Section 8: Explains the next steps and outlines requirements for consultation

<sup>&</sup>lt;sup>16</sup> For example, see People over Wind & Sweetman v Coillte Teoranta Case C-323/17

<sup>17</sup> http://publications.naturalengland.org.uk/publication/4720542048845824

- 1.22 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA are located in the SA Report. Appendix II provides a link to the original SAP SA Scoping Report (December 2014), available separately, which includes the details of the baseline evidence and the development of the SA Frameworks for assessment. Appendices III-V present the details of the SA of the options for defining BUABs, the approach to the Specific Sites (December 2017, updated June 2019 & July 2020, and Further Proposals (SA Addendum February 2019 available separately via link).
- 1.23 Appendix VI reports the consultation representations made to the previous SA Reports in 2017, 2018 and 2019 with summary responses. Appendix VII details the strategic SA of the options Scenarios X-Y & A-H for developing an approach to identifying and releasing reserve sites. Appendix VIII presents details of the SA of each identified Amber site option by settlement and is available separately. Appendix IX details the strategic SA of the options Scenarios1-5 that take into consideration the SA of the Amber sites. Appendix X details the SA of the Scenarios SB1-SB5 with regard to approaches to self-build and custom build houses. Appendix XI details the SA of the Preferred Approach to identifying & releasing reserve housing sites. Appendix XII details the SA of the provision for Self-Build and Custom Housebuilding (December 2017, updated June 2019 & July 2020).

## 2.0 STRATEGIC ENVIRONMENTAL ASSESSMENT & SUSTAINABILITY APPRAISAL METHODS

#### Introduction & the SA/SEA Process

- 2.1 Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Council as the planning authority; the SA findings do not form the sole basis for decision-making this is informed also by other studies, feasibility, and feedback comments from consultation. SA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.2 There is a tiering of appraisal/assessment processes that aligns with the hierarchy of plans from international, national, and through to local. SEA sets the context for subsequent project level studies during Environmental Impact Assessment (EIA) for major development projects. This tiering is acknowledged by the NPPF (2019) in paragraph 31 that states that for plan-making, evidence should be adequate and proportionate. This SA is an integrated appraisal that has incorporated the requirements of the EU SEA Directive; it is appropriate to the level of plan-making the Sites Allocation Plan (SAP) is focused on the identification of reserve housing sites in accordance with the Policy CS.16 in the adopted Core Strategy, together with the management of development relating to specific settlements and sites.

#### Scoping & the SA Framework (2014)

- 2.3 A scoping process for the SAP was carried out in 2014 by Enfusion. The scoping process included reviewing relevant plans, policies and programmes that had the potential to act in-combination with the SAP, and a collection of baseline information about the Stratford District. The 2014 SA Scoping Report for the SAP considered the previously identified key sustainability issues, problems and opportunities to be still relevant based on the plans, policies and programmes (PP) review and the baseline information (detailed in the Final SA Scoping Report, December 2014).
- 2.4 The SA Framework is the basis by which the sustainability effects of the emerging elements of the SAP are described, evaluated and options compared. It comprises 15 SA objectives, elaborated by decision making criteria, that are relevant to the objectives of the Local Plan and sustainable development in Stratford-upon-Avon. These objectives have been identified through the SA Scoping Stage from the information collated in the PP review, baseline analysis, identification of sustainability issues, a workshop with Officers, and the SA scoping consultation. The SA Framework aligns with that used to assess the Core Strategy, thus demonstrating correlation and consistency between the two assessments and the two plans. It identifies

soa276\_August 2020 11/131 Enfusion

decision-aiding questions for each SA objective, seeking to make these relevant to the assessment of site options and taking into consideration that proposals in the SAP must be compliant with national planning policy and policies in the Core Strategy.

#### Updating the SA Framework 2020

- 2.5 In 2020, as a result of further information and representations from the consultation during autumn 2019, it was decided to refine the SA Framework to help make it more specific to addressing the particular issue for delivery of affordable housing throughout the district. This issue has continued to develop over time, especially for progressing objectives for delivery of affordable housing in the rural areas. Therefore, SA Objective No 13 Housing was divided into two objectives: 13A Total Housing Capacity and 13B Affordable Housing Capacity. The threshold of >50 dwellings is retained for identifying major positive effects and up to 50 dwellings for minor positive effects for total housing capacities. A threshold of >18 dwellings was identified for major positive effects and up to 18 dwellings for minor positive effects for affordable housing capacity. This was calculated according to the requirements for Policy CS.18 that 35% of the total housing should be affordable. For those sites that would provide no affordable housing, this was considered minor negative effects to reflect the importance of progressing affordable housing in the SAP.
- 2.6 As a result of representations to the consultation in autumn 2019, it was determined that further strategic options should be investigated for the SAP, including consideration of the sizes of site options, the approach to Large Scale Sites, inclusion of all Neighbourhood Plans that are made and at referendum, and the approach to self-build & custom-build housing. It was determined that assessment of strategic options should progress a 2-staged approach an initial high level assessment of strategic options, followed by a second assessment of strategic options refined to consider the implications of the findings of the SAs of the Amber sites<sup>18</sup> that has progressed through the SHLAA process and thus constituted reasonable alternatives that have been identified through the SHLAA process.
- 2.7 It was considered appropriate to refine the SA Framework to ensure that it was fit for purpose, especially for assessment of the strategic options. The initial SA Framework that had been developed had assumed that the emerging SAP would be focused on site options. As the SAP has evolved, it has become clear that there needs to be further investigation of strategic approaches for the SAP and the SA needs amendment, as a consequence.
- 2.8 The SA helped identify and refine the strategic options, helping to make the options to be sufficiently distinct to inform decision-making. Previously, SA objective No 11 Reduce Barriers for those Living in Rural Areas had been assumed to be not applicable to the site options and the SAP, as all proposed

soa276\_August 2020 12/131 Enfusion

<sup>&</sup>lt;sup>18</sup> Please note that there were no Green sites found through SHLAA evaluation – only Amber (for further consideration) and Red (that were not progressed any further)

development would need to meet with requirements of the Core Strategy – including provision of/contributions to infrastructure and community services/facilities. It became apparent as strategic options were refined and assessed, that such an approach to SA No 11 was no longer relevant. It was important to investigate subtleties of differentiation between strategic scenarios, including for the rural areas.

- 2.8 The majority of the District is designated as a rural area and it is considered that definitions are as follows:
  - Rural Areas: all Local Service Villages (LSVs), including sites on the edges of such settlements; also, large-scale rural sites
  - Urban Areas: Stratford-upon-Avon (SUA) and the Main Rural Centres (MRCs) (Alcester, Bidford-on-Avon, Henley-in-Arden, Kineton, Shipston-on-Stour, Southam, Studley and Wellesbourne), including sites on the edges of such settlements
- 2.9 For SA Objective No 11, previously it had been considered that access to sustainable transport, services/facilities, and provision of affordable housing were covered by other SA Objectives numbers 10 Transport, 13 Housing, and 14 Community Health & Wellbeing and the intention was to avoid any double-counting for SA objectives at the level of sites assessment. However, at the strategic assessment level, it is considered that effects and commentary can be identified for the Rural Areas in recognition of the particular characteristics for the District. This takes into consideration that the overall objective for SA No 11 is to reduce barriers for those living in the rural areas. Therefore, 6 thresholds to define significance in a similar manner to the rest of the SA objectives were identified.
- 2.10 The refined SA Framework is set out in Table 2.1 as follows:

Table 2.1: SA Framework with Thresholds for Significance

	SA Objective Decision making criteria: Will the option/proposal		SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties		Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options	
1	Protect, enhance and manage sites, features and areas of	Q1a Will it preserve buildings of architectural or historic interest and, where necessary, encourage their	Core Strategy Policy CS.8 of the Core Strategy seeks to protect and enhance the historic environment.	++	Development is likely to have a substantial positive effect on the significance of the heritage asset / historic environment setting.	
	archaeological, historical and cultural heritage importance.	conservation and renewal?  Q1b Will it preserve or enhance archaeological sites/remains?	The nature and significance of the effects against this SA Objective will primarily relate to designated heritage assets and their setting. Any important non-designated heritage assets will be noted	+	Development has the potential for minor positive effects as it may secure appropriate new uses for unused Listed Buildings; enhance the setting of or access / signage to designated assets.	
		Q1c Will it improve and broaden access to, understanding, and enjoyment of the historic environment?	within the appraisal commentary.  Are there any designated heritage assets or their setting, which could be affected within or adjacent to the site?  Are there any opportunities to enhance	0	Development will have no significant effect. This may be because there are no heritage assets within the influence of proposed development or that mitigation measures are considered sufficient to address potential negative effects with the potential for a residual neutral effect.	
		Q1d Will it preserve or enhance the setting of cultural heritage assets?	cultural or heritage assets, such as: securing appropriate new uses for unused Listed Buildings; the removal of an eyesore	?	Element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.	
			to have a positive effect on the setting of designated assets; improved access and signage?		Development has the potential for a minor negative effect on a Conservation Area, Scheduled Monument, Listed Building and	
			Need to consider the nature and significance of the effects identified against SA Objective 2 (Landscape & Townscape), in terms of the setting of	-	Registered Historic Parks and Gardens and/or their setting. Even once avoidance and mitigation measures have been considered there is still the potential for a residual minor negative effect.	

SA Objective		Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	_	nificance Criteria - Standards & Thresholds or SA of Site Options & Strategic Options
			designated heritage assets.  It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.		Development has the potential for a major residual negative effect on a Conservation Area, Scheduled Monument, Listed Building and Registered Historic Parks and Gardens and/or their setting. Mitigation difficult and / or expensive.
2	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and	Q2a Will it safeguard and enhance the character of the landscape and local distinctiveness and identity?  Q2b Will it safeguard and enhance the character of	Core Strategy Policy CS.5 seeks to minimise and mitigate impacts on the landscape and, where possible, incorporate measures to enhance the landscape.  Policy CS.9 on Design and Distinctiveness seeks to ensure that development respects	++	Development has the potential for major landscape enhancement, for example through the removal of an eyesore and/or would regenerate previously developed land and buildings (PDL) that is currently having a major negative effect on the landscape/townscape.
	strengthening distinctiveness and its special qualities.	the townscape and local distinctiveness and identity?  Q2c Will it preserve or enhance the setting of cultural heritage assets?  Q2d Will it help limit noise	local distinctiveness. The policy sets out the factors that contribute to high quality design.  The nature and significance of the effects will primarily be dependent on the landscape sensitivity of the site option.	+	Development has the potential for minor landscape enhancement and/or would regenerate PDL that is currently having a minor negative effect on the landscape/townscape.  A neutral effect is not considered possible.
		pollution?  Q2e Will it help limit light pollution?  Q2f Will it encourage well-designed, high quality	The appraisal commentary will note if the site forms an important contribution to the character of the settlement.  If the landscape sensitivity is not known, then it is assumed that development on a greenfield site has the potential for a minor	?	Element of uncertainty for all site options until more detailed lower level assessments have been carried out.  The site option has medium sensitivity in landscape terms. Potential for a minor residual negative effect.

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	_	nificance Criteria - Standards & Thresholds or SA of Site Options & Strategic Options
		developments that enhance the built and natural environment?	negative effect as there would be development in a previously undeveloped area.  If the landscape sensitivity is not known, then it is assumed that development on a brownfield site has the potential for a minor positive effect as it would result in the regeneration of the site.  It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.  It is assumed that any Tree Preservation Orders within a site option will be retained in line with Core Strategy Policy CS.5 Landscape.		The site option has medium to high or high sensitivity in landscape terms and / or is within the AONB or its setting. Mitigation is likely to be difficult/ expensive. Potential for major residual negative effect.
3	Protect, enhance and manage biodiversity and geodiversity.	Q3a Will it lead to a loss of or damage to biodiversity interest?  Q3b Will it lead to habitat creation, matching BAP priorities?  Q3c Will it maintain and enhance sites nationally	Core Strategy Policy CS.6 Natural Environment seeks to secure a net gain in biodiversity from proposals. Where biodiversity losses cannot be avoided or mitigated the NPPF requires, as a last resort, compensation for this loss is to be made (NPPF paragraph 118).  The nature and significance of effects against this SA Objective will primarily	++	Development has the potential for major biodiversity enhancement / gains and to improve connectivity of GI.  Development will not lead to the loss of an important habitat, species, trees and hedgerows or lead to fragmentation of green and blue corridors or impede the migration of biodiversity, and there are potential opportunities to enhance biodiversity or geodiversity.

SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options
	designated for their biodiversity interest and increase their area?  Q3d Will it increase the area of sites designated for their geodiversity interest?  Q3e Will it maintain and enhance sites designated for their geodiversity interest?	relate to potential effects on designated biodiversity.  Is the site within, adjacent to, or in close proximity (200m) to any international or nationally designated biodiversity or geodiversity (SSSIs, SACs, SPAs or NNRs)? It should be noted that there are no European sites within the District and that they are already subject to a high degree of protection.	Development at the site is not likely to have negative effects on any internationally / nationally or regionally/ locally designated biodiversity or geodiversity. Potential for a residual neutral effect. or Development at the site has the potential for negative effects on sites designated as being of local importance. Mitigation possible, potential for a residual neutral effect.  Element of uncertainty for all sites until more
	Q3f Will it link up areas of fragmented habitat?	Is there evidence of European Protected Species or Habitats on the site?	detailed lower level surveys and assessments have been carried out.
	Q3g Will it increase awareness of biodiversity and geodiversity assets?	Is the site within, adjacent to, or in close proximity (200m) to any biodiversity or geodiversity sites designated as being of regional (RIGS) or local importance (Local Wildlife Site, Local Nature Reserve)?  It is recognised that when considering the potential for effects on designated biodiversity, distance in itself is not a definitive guide to the likelihood or severity of an impact. The appraisal commentary will try to note any key environmental pathways that could result in development potentially having a negative effect on designated biodiversity that may be some	Development at the site has the potential for negative effects on sites designated as being of regional or local importance. Mitigation difficult and / or expensive, potential for a minor residual negative effect.  or  - Development at the site has the potential for negative effects on an International (SAC, SPA and Ramsar) or National (SSSI, NNR) designated sites and / or European protected species or habitats. Mitigation possible, potential for a minor residual negative effect.  Development at the site has the potential for negative effects on an International (SAC, SPA and Ramsar) or National (SSSI, NNR)
		distance away.  Are there opportunities to enhance	designated sites and / or European protected species or habitats. Mitigation difficult and / or expensive, potential for a

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties		Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options	
			biodiversity? Possibly improve connectivity, green/blue infrastructure or enhance an important habitat?  Are there any opportunities to enhance geodiversity?		major residual negative effect.	
4	Reduce the risk of flooding.	Q4a Will it help prevent risk present in the district from fluvial flooding?	Core Strategy Policy CS.4 seeks to locate development in Flood Zone 1. The policy seeks to avoid flooding from all sources on	++	Development at the site could offer an opportunity to potentially significantly reduce flood risk.	
		Q4b Will it help prevent risk present in the district from	properties up to the 100-year flood event, including an allowance for climate change.	+	Development at the site could offer an opportunity to potentially reduce existing surface water run-off.	
		surface water flooding?  Q4c Will it help limit potential increases in flood risk likely to	Using the sequential text, the SHLAA process should have excluded sites wholly or mainly within flood zone 3.	0	The site is not within a flood risk area, and it has been shown that it will have a limited impact on flood risk in the wider catchment	
		take place in the district as a result of climate change?	It is assumed that development at any of	?	There are uncertainties about flood risk.	
			the site options has the potential to incorporate Sustainable Drainage in some form.	-	The site is partially within an area of high flood risk, or at risk of surface water flooding in parts of the site.	
			The nature and significance of effects against this SA Objective will primarily relate to if a site option is within an area of flood risk or has the potential to reduce flood risk.		The site is wholly within an area of high flood risk or at risk of surface water flooding across the entire site.	
5	Minimise the district's contribution to	Q5a Will it help reduce Stratford-on-Avon's carbon footprint?	Core Strategy Policy CS.2 relates to climate change adaptation and mitigation.	++	Development has the potential to significantly reduce levels of traffic in an area that is experiencing congestion issues.	

SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options
climate change.		decision making criteria, including any	
		There is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.	

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	_	nificance Criteria - Standards & Thresholds or SA of Site Options & Strategic Options
6	Plan for the anticipated levels of climate change.	Q6a Will it help limit potential increases in flood risk likely to take place in the district as a result of climate change?	Flooding is addressed against SA Objective 4.  It is assumed that any proposal for development can incorporate climate	++	Development at the site option will not lead to the loss of public open space or green infrastructure and has the potential to significantly improve access to them.
		Q6b Will it encourage the development of buildings prepared for the impacts of climate change?	change adaptation measures.  It is therefore considered that the nature and significance of the effect against this	+	Development at the site option will not result in the loss of public open space or green infrastructure.
		Q6c Will it retain existing	SA Objective should primarily relate to the loss of public open space and green	0	A neutral effect is not considered possible.
		green infrastructure and promote the expansion of green infrastructure to help	infrastructure. Loss can relate to both a loss of quality and / or extent of formal and informal natural green space.	?	There is some uncertainty with regard to the land type.
		facilitate climate change adaptation?		-	Development at the site has the potential to lead to the loss of less than 1 hectare of public open space and green infrastructure.
				-1	Development at the site option has the potential to result in the loss of greater than 1 hectare of public open space and green infrastructure.
7	Protect and conserve natural	Q7a Will it include measures to limit water consumption?	The efficient use of land and utilisation of derelict, degraded, and under-used land is		Minerals A major positive effect is not considered
	resources.	Q7b Will it safeguard the	now considered against SA Objective 6.	++	possible.  Agricultural Land
		district's minerals resources for future use?	It is assumed that development at any of the site options could potentially incorporate water efficiency measures.		The site option is entirely brownfield land and does not contain any best and most versatile agricultural land.
		Q7c Will it utilise derelict, degraded and under-used land?	It is therefore considered that the nature and significance of the effects against this SA Objective should primarily relate to	+	Minerals A minor positive effect is not considered possible. Agricultural Land

SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	_	nificance Criteria - Standards & Thresholds or SA of Site Options & Strategic Options
8 Reduce air, soil	Q7d Will it lead to the more efficient use of land?  Q7e Will it lead to reduced consumption of materials and resources?  Q7f Will it lead to the loss of the best and most versatile agricultural land?	areas allocated or safeguarded for minerals and the loss of agricultural land. This SA objective will therefore address two separate issues.  If there is uncertainty with regard to the agricultural land classification for a site option then a precautionary approach will be taken, i.e. If the evidence indicates that a site option is Grade 3 agricultural land but no distinction is made between 3a or 3b, it will be assumed that development at the site will lead to the loss of Grade 3a agricultural land.	?	The site option is partially PDL and does not contain any best and most versatile agricultural land.  Minerals The site option is not within or adjacent to an area allocated or safeguarded for minerals.  Agricultural Land A neutral effect is not considered possible.  Minerals It is uncertain if a site option is within or adjacent to an area allocated or safeguarded for minerals.  Agricultural Land There is uncertainty with regard to the agricultural land classification.  Minerals A proportion of the site option is within or adjacent to an area allocated or safeguarded for minerals and development would sterilise the resource.  Agricultural Land A proportion of the site option is best and most versatile agricultural land (Grades 1, 2 & 3a).  Minerals The entire site is within an area allocated or safeguarded for minerals and development would sterilise the resource.  Agricultural Land The entire site is within an area allocated or safeguarded for minerals and development would sterilise the resource.  Agricultural Land The entire site option is best and most versatile agricultural land (Grades 1, 2 & 3a).  Air Quality
and water	water quality of both surface	addressed against other SA Objectives.	++	Development has the potential to

SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options
pollution.	water and groundwater features?  Q8b Will it lead to improved air quality?	Agricultural land quality against SA Objective 7 and contaminated land against SA Objective 14.  It is therefore considered that the nature	significantly reduce levels of traffic within an AQMA. Potential for a major positive effect.  Water Quality  Development has the potential to significantly enhance water quality.
	Q8c Will it maintain and enhance soil quality?  Q8d Will it reduce the overall amount of or diffuse pollution to air, water and soil?	and significance of the effects against this SA Objective should primarily focus on water and air quality.  The nature and significance of effects on water quality is dependent on if the site option lies within a Surface Water	Air Quality Development has the potential to reduce levels of traffic in an AQMA. Potential for a minor positive effect.  Water Quality Development has the potential to enhance water quality.
	Safeguarded Zone, Grou Protection Zone, Surface Water Protection Area 'c Groundwater Drinking W Area 'at risk' or probably It is assumed that develo the site options has the p incorporate Sustainable	Safeguarded Zone, Groundwater Source Protection Zone, Surface Water Drinking Water Protection Area 'at risk' or Groundwater Drinking Water Protected Area 'at risk' or probably 'at risk'.  It is assumed that development at any of the site options has the potential to incorporate Sustainable Drainage.	Air Quality Development at the site has the potential to increase traffic and therefore atmospheric pollution; however, there is suitable mitigation to ensure that negative effects are addressed. Potential for a residual neutral effect.  Water Quality The site is not within any Safeguarded Zones, Source Protection Zones or Protected Areas
		It should be noted that effects on air quality against this SA Objective are closely linked to the potential effects identified against SA Objective 5 relating to the potential traffic impacts of development.  There is an element of uncertainty for all sites until more detailed lower level surveys	'at risk'.  Air Quality There is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.  Water Quality There is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options
			and assessments have been carried out.	Air Quality Development has the potential to increase traffic within an AQMA.  Water Quality Site option lies within either a Surface Water Safeguarded Zone, Groundwater Source Protection Zone, Surface Water Drinking Water Protection Area 'at risk' or Groundwater Drinking Water Protected Area 'at risk' or probably 'at risk', and would contribute towards a failure to meet 'good' chemical quality in line with the requirements of the Water Framework Directive.  Air Quality Development has the potential to significantly increase traffic within an AQMA.  Water Quality It is considered likely that development will have a major negative effect on water quality.
9	Reduce waste generation and disposal, and promote the waste hierarchy of reduce, reuse, recycle/compost, energy recovery and disposal.	Q9a Will it provide facilities for the separation and recycling of waste?  Q9b Will it encourage the use of recycled materials in construction?	It is assumed that any proposal for development can provide facilities for the separation and recycling of waste as well as encourage the use of recycled materials in construction.  Development at any of the site options is likely to increase waste in the short (construction) and long-term (operation and decommissioning). It is considered that there will be sufficient mitigation provided through Core Strategy as well as development management policies and	N/A  N/A  N/A  All site options have the potential for a neutral effect.  N/A  N/A  N/A

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties		nificance Criteria - Standards & Thresholds or SA of Site Options & Strategic Options
			available at the project level to ensure any significant negative effects are addressed with a neutral residual effect against this SA Objective.  It is therefore considered that all site options have the potential for a neutral effect against this SA Objective.		N/A
10	Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Q10a Will it reduce the need to travel?  Q10b Will it encourage walking and cycling?  Q10c Will it reduce car use?  Q10d Will it encourage use of public transport?  Q10e Will it provide adequate means of access by a range of sustainable transport modes?	The potential traffic impacts of development at the site options has been considered against SA Objective 5.  The nature and significance of the effect against this SA Objective will focus on access to existing sustainable transport modes and services and facilities.  It is assumed that development at any of the site options could potentially provide or contribute to improved sustainable modes of transport.  It is also assumed that any proposal for	++	The site has good access to all sustainable transport modes (within 400m to a bus stop and 800m to a train station) and is within 400m to existing facilities / services.  Development has the potential to reduce the need to travel. There are no potential barriers to movement.  The site has access to either bus or rail facilities (within 400m to a bus stop or 800m to a railway station) and is within 400m to existing facilities / services. Development is likely to reduce the need to travel. There are no potential barriers to movement.  A neutral effect is not considered possible.
		Q10f Will it help limit HGV traffic flows?	development can make appropriate and timely provision for necessary supporting infrastructure, including health, green infrastructure and other community facilities and services.	?	There is an element of uncertainty for all site options.
			Where necessary the appraisal will note the realities of the situation with regard to existing access to public transport and	-	The site has access to either bus or rail facilities (within 400m to a bus stop or 800m to a railway station) and is within 800m to existing facilities/ services. Development is less likely to reduce the need to travel.

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties		Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options	
			facilities/services, i.e. A site option may be within 800m of a railway station but there are no suitable footpaths or cycle ways to access it. The topography of the site option or area may also be a barrier to movement.		The site has no access to sustainable transport modes (within 400m to a bus stop or 800m to a railway station) and is beyond 800m to existing facilities/ services.  Development is likely to continue reliance on the private vehicle.	
11	Reduce barriers for those living in rural areas <sup>19</sup>	Q11a Will it increase provision of local services and facilities and reduce centralisation?  Q11a Will it improve accessibility by a range of transport modes to services and facilities from rural areas?	Sites: It is assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green infrastructure and other community facilities and services.  Access to existing modes of sustainable transport has been addressed against SA	++	Sites: N/A Strategic Options: Development is likely to significantly reduce barriers for those living in rural areas, for example, through major positive increased provision of sustainable transport, affordable housing, and/or local services & facilities.	
		Q11a Will it support the provision of affordable the si housing in rural areas?  Policy The count of the si have other count SA O reaso.  Strate used	Objective 10. It is assumed that development at any of the site options should meet the affordable housing requirement set in Core Strategy Policy CS.18. The criteria relating to this SA Objective have already been considered against other SA Objectives. To avoid double	+	Sites: N/A Strategic Options: Development is likely to somewhat reduce barriers for those living in rural areas, for example, through some minor increased provision of sustainable transport, affordable housing, and/or local services & facilities.	
			counting, it is therefore considered that this SA Objective is not applicable to the SA of reasonable site options.  Strategic Options: Professional judgment used to consider barriers as a whole for those living in rural areas -	?	A neutral effect is considered unlikely as a strategic approach that excluded development in the rural areas would constitute a negative effect for the objective to reduce barriers.  There is an element of uncertainty for all site options or strategic scenarios.	

<sup>&</sup>lt;sup>19</sup> Please note that this SA objective was amended in 2020

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	•	nificance Criteria - Standards & Thresholds or SA of Site Options & Strategic Options
				-	Sites: N/A Strategic Options: Minor negative effects through exclusion of options or strategic approaches to reduce barriers for those living in rural areas.  Sites: N/A Strategic Options: Major negative effects through exclusion of options or strategic approaches to reduce barriers for those living
12	Protect the integrity of the district's countryside.	Q12a Will it prevent the degradation of land on the urban fringe?  Q12b Will it lead to a loss of	The loss of agricultural land is addressed against SA Objective 7.  This SA Objective and the remaining decision-aiding criteria relate to the	++	in rural areas.  Development would significantly enhance the character of the settlement and has a minor/no contribution to defining and maintaining the separate identity of the settlement.
		agricultural land?  Q12c Will it safeguard local distinctiveness and identity?	degradation of land on the urban fringe as well as the safeguarding of local distinctiveness and identity. It is therefore considered that the nature and	+	Development would enhance the character of the settlement and has a minor/ no contribution to defining and maintaining the separate identity of the settlement.
			significance of the effects on this SA Objective primarily relate to the	0	It is not considered possible to have a neutral effect.
			contribution of the site options to the character of the settlement and their importance in defining and maintaining	?	The site makes an uncertain contribution to the character of the settlement or to defining and maintaining its separate identity.
			the settlements separate identity.  The Green Belt should also be a consideration under this SA Objective as it aims to prevent urban sprawl by keeping land permanently open and therefore relates to the remaining decision-aiding		The site forms a significant contribution to the character of the settlement and/ or has some contribution to defining and maintaining the separate identity of the settlement and/or is within the Green Belt (low/ medium importance/ contribution).
			criteria. If a site option is within the Green Belt then the appraisal commentary will try		The site forms a significant contribution to the character of the settlement as well as significantly contributes to defining and

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties		Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options	
			and note, where possible, the importance of that sites contribution to the purposes of the Green Belt, e.g. whether the site is brownfield land and does not contribute to the purposes of the Green Belt.		maintaining the separate identity of the settlement and/or is within the Green Belt (high importance/ contribution).	
13 A & B	Provide affordable, environmentally sound and good quality housing	Q13a Will it ensure all groups have access to decent, appropriate and affordable housing?	It is assumed that development at any of the site options has the potential to meet the design standards set out within Core Strategy Policy CS.9 Design and Distinctiveness and the NPPF.	+	<b>Sites &amp; Strategic Options</b> : Potential for the option to accommodate more than total housing capacity of 50 dwellings; potential to accommodate more than 18 affordable housing dwellings <sup>21</sup> .	
	for all <sup>20</sup> .	Q13b Will it identify an appropriate supply of land for new housing?	It is assumed that development at any of the site options should meet the affordable housing requirements set in the Core	+	<b>Sites &amp; Strategic Options:</b> Potential for the site option to accommodate residential development less than 50 total housing capacity or less than 18 affordable housing.	
		Q13c Will it ensure that all new development contributes to local distinctiveness and improve the local environment?  Q13d Will it meet the building specification guidance in	Strategy.  Given the points set out above, it is considered that this SA Objective will not be a key differentiator between site options as it relates to the provision of housing. The nature and significance of the effect will be determined by whether	0	If no housing is being proposed as part of development, as it is an employment site, then it is considered to have a neutral effect. If the site is proposed for housing but it is small & does not meet the threshold so there is no affordable housing included, then it is considered to have a neutral effect.  Capacity of the site to accommodate	
		Building Regulations (previously Design Code for Sustainable Homes DCLG)?  Q13e Will it reduce the	residential development can be accommodated at the site.  Local distinctiveness is addressed against SA Objective 12.	?	residential development is unknown.  Development at the site may restrict other residential development.	

<sup>&</sup>lt;sup>20</sup> This SA Objective was expanded in 2020 in order to investigate potential capacity of affordable housing - into 13A Total Housing Capacity & 13B Affordable Housing Capacity

<sup>&</sup>lt;sup>21</sup> Calculated as approximately 35% of total housing in accordance with Policy CS.18

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options	
		number of households on the Housing Register?		-	Development at the site may prevent other residential development.
14	Safeguard and improve community health, safety and wellbeing.	Q14a Will it improve access for all to health, leisure and recreational facilities? Q14b Will it improve and enhance the district's green infrastructure network?	Core Strategy Policy CS.25 Healthy Communities seeks to ensure that, with the release of land for development, arrangements are put in place to improve infrastructure, services and community facilities to mitigate development and	++	It is considered unlikely that development at any of the site options will have major positive effects on health.
		Q14c Will it improve long term health? Q14d Will it ensure that risks to human health and the environment from contamination are identified and removed?	It is assumed that development at any of the site options has the potential for short-term minor negative effects arising during construction phases, and that suitable mitigation exists to ensure that these do	+	It is assumed that there is the potential for development at all the site options to have indirect long-term positive effects on health through the provision of housing or employment by helping to meet the needs of the Plan area.
		Q14c Will it improve long term health? Q14e Will it encourage healthy and active lifestyles? Q14f Will it reduce obesity?	not result in long-term negative effects on health and well-being.  It is assumed that any proposal for development can make appropriate and	0	The site is not likely to be affected by neighbouring land uses or major infrastructure.
		Q14g Does it consider the needs of the district's growing elderly population? Q14h Will it enable communities to influence the	timely provision for necessary supporting infrastructure, including health, green infrastructure and other community facilities and services, or contributions towards them.	?	There is an element of uncertainty for all sites until more detailed site level assessments have been undertaken.
		decisions that affect their neighbourhoods and quality of life? Q14i Will it improve the	It is also assumed that there is the potential for development at all the site options to have indirect long-term positive effects on	-	The site is affected by neighbouring land uses and / or major infrastructure.
		satisfaction of people with their neighbourhoods as a place to live? Q14j Will it reduce crime and	health through the provision of housing or employment by helping to meet the needs of the Plan area.  It is therefore considered that the nature		The site is significantly affected by neighbouring land uses and / or major infrastructure.

	SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options
		the fear of crime? Q14k Will it reduce deprivation in the district? Q14l Will it improve road safety?	and significance of the effects against this SA Objective primarily relates to conflicting neighbouring land uses and major infrastructure. The appraisal commentary will note if a site option is known to be or has the potential to be contaminated. It is considered that there will be sufficient mitigation provided through Core Strategy policies as well as development management process and available at the project level to ensure that there will be no significant issues with regard to contaminated land. It is therefore not considered likely to be a key differentiator between the sites so will not influence the nature or significance of effects against this SA Objective.  There is an element of uncertainty for all site options until more detailed site level assessments have been undertaken.	
15	Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Q15a Will it ensure that new employment, office, retail and leisure developments are in locations that are accessible to those who will use them by a choice of transport modes?  Q15b Will it help ensure an adequate supply of employment land?	Core Strategy Policy CS.22 Economic Development seeks to facilitate appropriate employment uses in the countryside, including farm-based activities. It also seeks to protect existing employment sites unless they are no longer viable or appropriate for a business purpose. Access to existing transport modes has been addressed against SA Objective 10. The nature and significance of the effects	Potential for the site option to accommodate employment development, with good access to existing employment opportunities.  Potential for the site option to accommodate employment development.  If no employment land is being proposed as part of development, as it is a housing site, then it is considered to have a neutral effect against this SA Objective.  Capacity of the site to accommodate

soa276\_August 2020 29/131 Enfusion

SA Objective	Decision making criteria: Will the option/proposal	SA of Site & Strategic Options - decision making criteria, including any Assumptions or Uncertainties	Significance Criteria - Standards & Thresholds for SA of Site Options & Strategic Options	
	Q15c Will it support or encourage new business	on this SA Objective will primarily relate to the capacity of the site to accommodate		employment development is unknown.
	sectors?  Q15d Will it support the visitor	employment land, access to existing employment, and the potential loss of existing employment.	-	Development at the site may restrict other employment development and/ or has poor access to existing employment opportunities.
	economy?		-1	Development at the site may prevent other employment development and/ or lead to the loss of existing employment.

- 2.11 Each emerging element of the SAP was appraised against the SA Framework of Objectives using professional judgment supported by the baseline and wider Plan evidence base. The nature of the likely sustainability effects (including major/minor, positive/negative, duration (short, medium or long term), permanent/ temporary, secondary<sup>22</sup>, cumulative<sup>23</sup> and synergistic<sup>24</sup>) were described in the appraisal commentary, together with any assumptions or uncertainties. Where possible or necessary, the SA made suggestions and recommendations to mitigate negative effects or promote opportunities for enhancement of positive or neutral effects.
- 2.12 A summary appraisal commentary reported any significant effects identified with suggestions for mitigation or enhancement to be made where relevant, and likely residual effects. SA is informed by the best available information and data; however, data gaps and uncertainties exist, and it is not always possible to accurately predict effects, particularly at a strategic level of assessment. Throughout, the SA used categories of significance represented by colours and symbols as set out in the following table:

Table 2.2: Categories of Significance of Likely Effects

Key: Categories of Significance		
Symbol	Meaning	Sustainability Effect
	Major Negative	Problematical, improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect

# Appraising the Stratford-on-Avon Site Allocations Plan: Revised Scoping (2017)

2.13 A comparative SA was undertaken of the options for defining the Built-Up Area Boundaries (BUABs) using the SA Framework, updated evidence, and professional judgment. The same method was then used to test the preferred

<sup>&</sup>lt;sup>22</sup> Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

<sup>&</sup>lt;sup>23</sup> Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

<sup>&</sup>lt;sup>24</sup> These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

approach that had been applied to the definition of BUABs for Main Rural Centres and the Local Service Villages. The approach to options in planmaking and alternatives in SA is explained further in Section 4 of this SA Report.

2.14 The proposed revised and new Proposed Allocations for Specific Sites, the new proposed Policy on Self-Build & Custom Housebuilding, and the three site options already put forward for self-build/custom housebuilding, were tested through SA using the same methods - based on the SA Framework of objectives and decision-aiding criteria/questions and baseline information. This SA work was undertaken by Enfusion staff.

# Appraising the Additional Specific Proposals (February 2019 & June-August 2020)

2.15 The additional specific proposals that came forward during 2018 and that the Council considered should be investigated for possible inclusion in the SAP were also subject to SA using the same methods. A summary baseline overview relevant to each of the SA objectives was compiled and assessments carried out using the full SA Framework; summary findings were recorded, and significant effects described, as set out in the SA Addendum Report (February 2019). This work was undertaken by Council Officers working in liaison with Enfusion staff to ensure correlation and compatibility with assessments. The further site-specific proposals that became available in 2020 were tested through SA by Enfusion in a comparable manner.

## Appraising the Stratford-on-Avon Site Allocations Plan: Options for Reserve Housing Sites (2019-2020)

- 2.16 Decisions about which sites to identify have been based on the findings of the Strategic Housing Land Availability Assessment (SHLAA) and other technical information, including the SA. The Council is using a standard method agreed by the Coventry and Warwickshire local authorities and available on the Council's website<sup>25</sup>. This is a criteria-based assessment considering factors for suitability, achievability, and deliverability. A RAG (red, amber, green) analysis identifies site options that could be considered to be reasonable alternatives and should be tested through SA. Those site options that are found to have an amber or green deliverability through the RAG analysis were considered reasonable alternatives (deliverable) and thus tested through the SA process.
- 2.17 The reasonable site options identified in relation to each relevant settlement, were tested through SA using the full SA Framework. The key likely significant positive and negative effects were recorded with symbols/colours and summarised for each site option and for the implications for each settlement reported, including consideration of cumulative or synergistic effects where possible/relevant. Details were recorded in a SA matrix for each settlement as indicated by the table, as follows:

<sup>25</sup> https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan.cfm

Table 2.3: Outline Approach to Assessing Site Options

Table 2.3. Colline Approach to Assessing sile Options			
Settlement Name			
SA Objective 1 SA Objective 2 SA Objective 3			
Site option	+	-	
Site option	-	-	
Commentary:			
Key Significant Positive Effects			
Key Significant Negative Effects			
Recommendations and suggestions for mitigation of negative effects or			
enhancing positive effects.			

2.18 The appraisal was undertaken using professional judgment, supported by the baseline information and further updated evidence, as well as any other relevant information sources available, such as through Defra Magic maps<sup>26</sup>. This SA work on the site options was undertaken by Council Officers, again in liaison with Enfusion staff to ensure correlation and compatibility.

# Appraising the Stratford-on-Avon Site Allocations Plan: Scenarios X-Y, A-H & Scenarios 1-5 (June 2020)

- 2.19 A number of approaches to releasing reserve housing sites were identified initially and these scenarios were investigated through SA at the strategic level in 2019. As a result of consultation comments, identification and refinement of scenarios was developed into a staged approach. The numbers of reserve housing were revisited, and two Scenarios X&Y were investigated through SA. High level Scenarios A-H were identified to explore the options available for developing a strategy to identify and release reserve housing sites. These scenarios were investigated through SA and this tested different approaches to excluding certain areas from proposed development.
- 2.20 Then Scenarios 1-5 were developed and these explored options in more detail for example, excluding different categories of Local Service Villages LSVs and limiting the sizes of development proposals. This strategic assessment took into consideration the findings of the SAs of the site options that had achieved Amber through the RAG analysis (no site options were found to be Green; those scoring Red were not progressed any further). The SA used the SA Framework of objectives and professional judgment with available information in order to find some differentiation between the scenarios in consideration of effects from the Amber sites in each settlement and the district as a whole for each and cumulatively, where possible. Overall, if more than 50% of the sites in a settlement was identified for negative or positive effects, then this was considered potentially of cumulative

<sup>&</sup>lt;sup>26</sup> http://magic.defra.gov.uk/

- significance. If more than 80% of the sites was identified, this was considered potentially of cumulative significance for the district as a whole.
- 2.21 For some scenarios, both positive and negative effects were found, for example, excluding amber sites in the rural areas would have positive effects in such rural areas through avoiding any new development but by focusing proposed development in the Main Town and Main Rural Centres, there may be likely negative effects. Both effects were recorded by showing 2 colours/symbols for the relevant cell in the SA matrix with the commentary providing the explanation.
- 2.22 Identifying positive effects for certain categories of the District area and negative effects for others was found more in the assessment of the Scenarios A-H where there was more uncertainty due to the absence of spatial specificity. Such effects were found for SA objectives on heritage, landscape, agriculture, climate change & traffic, and housing total capacity and potential affordable housing capacity. For Scenarios 1-5, similar positive and negative effects were found for the SA landscape objectives. This necessitated recording both positive and negative effects with split cells for the colour/symbols for the relevant SA objectives with explanation in the text commentaries.

## Appraising the Stratford-on-Avon Site allocations Plan: Preferred Options (August 2020)

2.21 The preferred approach to identifying and releasing reserve housing sites was then developed and tested through SA in a comparable manner using the full SA Framework and to the same level of detail as Scenarios 1-5.

#### Implementation of the Plan

- 2.22 The SA of the Preferred Options draft SAP also considered inter-relationships and cumulative effects and for the implementation of the SAP as a whole as required by the SEA Regulations. This SA work and the preparation of the SA Report documents was undertaken by Enfusion staff. The overall likely effects of implementing the plan were appraised by sustainability topics as follows:
  - Housing, Economy & Employment & Communities
  - Transport, Air Quality & Climate Change
  - Historic Environment
  - Landscape & Soils
  - Biodiversity & Geodiversity
  - Flooding & Water Quality

#### Consultation

- 2.23 The SEA Directive and Regulations require early and effective public consultation. The proposed scope of the SAP was subject to wide consultation in 2014. The SA Scoping Report was subject to statutory consultation with the SEA statutory bodies (Historic England, the Environment Agency, and Natural England). Comments received on the SA scoping were taken into consideration and reported in the final SA Scoping Report (December 2014). The Initial SA Report (December 2017) accompanied the Revised Scoping & Initial Options for the SAP on consultation through the Council's website during February-March 2018. The SA Addendum Report (February 2019) was placed on public consultation during February-March 2019. A SA Report accompanied the draft SAP for public consultation during the autumn 2019. This SA Report accompanies the Preferred Options SAP on Regulation 18 consultation during the autumn 2020.
- 2.23 Comments made on the SA documents during consultations are provided in this SA Report in Appendix VI and discussed in section 6.

# 3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

#### Introduction

3.1 In order to establish a clear scope for the SA of the SAP, it is necessary and a requirement of SEA, to review and develop an understanding of the baseline conditions of the plan area and the wider range of plans and programmes that are relevant to the plan. The Stratford-on-Avon SAP Scoping Report (December 2014) considered and reported baseline conditions for the plan area, as well as the plans and programmes that may affect or be affected by the SAP. Analysis of this information helped the Scoping Report to identify the key issues and opportunities for sustainable development in Stratford-on-Avon and create sustainability objectives to address these key issues. Full details can be found in the December 2014 SAP SA Scoping Report and are summarised in this section.

## Review of Plans & Programmes (PPs)

- 3.2 A review of relevant plans and programmes was undertaken during the SA/SEA scoping stage in accordance with the requirements of the SEA Directive. This included considering the wider plans reviewed as part of the development of the evidence base for the SAP. A review of plans, policies and programmes built upon the earlier SA of the Core Strategy and was completed as part of the SA Scoping for the Stratford-on-Avon Gypsy & Traveller Plan in February 2014; this was then reviewed and updated for the SAP SA Scoping in December 2014.
- 3.3 Since then, new plans and programmes have emerged, and a further update is required. The key plans and programmes that have emerged since 2014 and are relevant for consideration are listed below:
  - Historic England, Action Plan 2015-2018: Details how Historic England will meet and achieve their aims and objectives, which includes protecting England's most important heritage, supporting constructive conservation and maintaining heritage assets throughout the country.
  - Housing White Paper (2017, 2018 & 2019): The Housing White Paper details the government's reforms to increase housing supply whilst ensuring that the housing market is more efficient and meets the needs for all households.
  - Air Quality Plan for Nitrogen Dioxide (2017): Sets out how the government plans to tackle levels of nitrogen dioxide in major cities where there are associated health risks due to large concentrations.
  - Clean Air Strategy (2019): Sets an ambitious long-term target to reduce people's exposure to particulate matter (PM).

- Severn River Basin District Management Plan (RBMP) (2015): The RBMP details the current state of the water environment, including the chemical and ecological quality of waterbodies in the district. The Plan also states the current threats to water quality in the basin, and the targets for improvements over the Plan period.
- Stratford-upon-Avon Area Transport Strategy (2017) The strategy focuses on developing a transport strategy for the town of Stratford-upon-Avon, including improvements to transport links and managing HGV traffic. The strategy includes a framework with themes that will help achieve the relevant aims of the strategy.
- Coventry & Warwickshire Strategic Economic Pan Update (2016): This is an updated version of the 2014 Plan, detailing the strategy to grow the local economy and employment base.
- A Green Future: 25 Year Plan to Improve the Environment (2018) sets out government action to help the natural world regain and retain good health.
- National Planning Policy Framework (2018 & Updated 2019): Includes requirement for net environmental gains.
- Worcestershire Minerals Local Plan (2019 Publication Version submitted for examination December 2019.
- Environment Bill (2019-2020) Targets, plans and policies for improving the natural environment - environmental protection, waste and resource efficiency & air quality, nature and biodiversity, and conservation.
- Planning for the Future White Paper (MHCLG 2020) Proposed reforms to the planning system including zones – Growth; Renewal; Protection – and removal of the second tier of development management with the principle of approved development decided at the local plan stage https://www.gov.uk/government/consultations/planning-for-the-future
- Changes to the Current Planning System (MHCLG 2020 consultation 6 August to 1 October) includes 4 main proposals: changes to the standard method for assessing local housing need; securing First Homes through developer contribution in the short term; temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing; extending the current Permission in Principle to major development -

https://www.gov.uk/government/consultations/changes-to-the-current-planning-system

These recent proposed changes to the planning system published by the UK Government in August 2020 for consultation indicate that the Preferred Options version of the SAP may need further amendment to adjust for changes in the planning system – perhaps likely in early 2021. The key implication for the SAP is likely to be associated with the proposed change to

the standard method for assessing local housing need as this could affect delivery of affordable housing – identified as a key issue for the SAP.

#### **Baseline Conditions**

- 3.4 The SEA Regulations require the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the Plan area. This then provides the basis for predicting and monitoring the likely effects of the draft Plan. The aim is to collect only relevant and sufficient data on the present and future state of the Plan area to allow the potential effects of the SAP to be adequately predicted.
- 3.5 Detailed baseline information is provided in the SAP SA Scoping Report (December 2014). The SA/SEA Guidance produced by Government<sup>27</sup> proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. A summary of the baseline current situation, with trends and possible evolution without the SAP, where possible, is set out in the paragraphs following. New and updated information since the original scoping in 2014 has been included.
- 3.6 **Environment:** There are no internationally designated nature conservation sites in the district, however there are 37 Sites of Special Scientific Interest (SSSIs) and 4 Local Nature Reserves. The SSSIs are either in a favourable or unfavourable but recovering condition. The district contains ancient woodlands, as well as rich species diversity, including the Water Vole and the Great Crested Newt. The geology of the district is varied, and has historically produced a range of minerals, although now the main use of materials is for aggregate in construction, with local building stone quarries having largely closed down.
- 3.7 Water & Soil: The River Avon is the main river in the district, flowing through the district from east to west. Severn Trent Water is the main supplier of water in the district, with a small amount supplied by South Staffordshire Water Plc, and water resources in the area are under 'moderate stress' with some areas under 'serious stress. The district currently has predicted supply-demand deficits. The chemical water quality in the district is generally favourable. The biological water quality of the area has decreased since 2002. The district suffers from fluvial flooding due to the impermeability of the underlying geology, and the more built up areas also suffer from surface water flooding. There are concentrations of Grade 2 agricultural land to the south and east of Stratford-Upon-Avon and surrounding Bidford-on-Avon and Wellesbourne, as well as to the south-east of the district bordering Oxfordshire.

soa276\_August 2020 38/131 Enfusion

<sup>&</sup>lt;sup>27</sup> Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <a href="http://planningguidance.planninggortal.gov.uk/blog/guidance/">http://planningguidance.planninggortal.gov.uk/blog/guidance/</a>

- 3.8 **Air Quality:** The district has very good air quality, however there are issues in Studley and Stratford-upon-Avon. Both have AQMA zones due to levels of NO<sub>2</sub> exceeding the annual mean. Transport is the highest emitting sector for air pollution in the district.
- 3.9 **Social:** The district has a low population density, and there is a low level of young working age residents and a higher level of age groups over 45 than the average for England. Most residents are classed as 'White British', and the district has low levels of multiple deprivation. The health priorities in Stratford-on-Avon include addressing alcohol misuse, smoking in pregnancy, and tackling obesity. Fuel poverty is an issue for 12.4% of district residents, and water poverty for low-income households. The district has low levels of crime, with the highest levels of crime and anti-social disorder occurring around the main town of Stratford-upon-Avon.
- 3.10 **Transport:** The M40, M42 and A46 comprise the strategic road network for the district. There are identified congestion issues on a number of roads in the district, including within the main settlement of Stratford-upon-Avon. The Stratford-upon-Avon Area Transport Strategy aims to manage traffic within the town and address existing congestion and access issues. The main railway lines are the Chiltern Line and the Shakespeare Line, both of which are key commuter routes and provide access for tourists. The district has a wideranging Public Right of Way network and an extensive cycle network. Accessibility to jobs and services for those living in rural settlements is an issue.
- 3.11 **Education & Employment:** A high proportion of district residents have high level qualifications, with educational performances exceeding national levels in the district. The district has low unemployment rates, with 3.7% of residents unemployed. A high proportion of residents work in managerial, senior and professional occupations, and there are levels of out-commuting to surrounding urban areas including Birmingham and Oxford. The majority of people in Stratford work in the service industry. Tourism is also one of the main sources of employment in the District with over 8,000 jobs supporting the industry. There is a high level of in-commuting for lower paid jobs by people who can't afford local housing. Improvements to telecommunications infrastructure in the district are needed to provide high speed broadband and support home working and rural businesses.
- 3.12 **Heritage & Green Spaces:** The district has a wide range of heritage assets that includes 3,430 Listed Buildings, 75 Conservation Areas, 84 Scheduled Monuments and 11 Registered Parks or Gardens. There are a number of non-designated features of historical interest that comprise a significant aspect of the heritage aspect and are considered important by local communities. There is a deficiency of open space in Stratford town and most of the main rural centres.

#### **Key Sustainability Issues**

3.13 From this information, the following key sustainability issues have been identified for the Plan:

#### Table 3.1: Key Sustainability Issues, Problems and Opportunities

#### Key Sustainability Issues for the Stratford-on-Avon District

- Congestion: The Districts road network is becoming increasingly congested, particularly along radial and sub-radial routes. This has the potential for adverse effects on human health, safety and the economy. It can make commuter journeys more stressful and delay buses which are then unable to offer a viable alternative to the car for some journeys. Congestion can make deliveries less reliable and deter investment in the area.
- Travel Methods: Ensuring the viability and vitality of alternative modes of transport provides choice, helps to reduce congestion and can contribute to healthier lifestyles.
- Health: Whilst health levels are generally high, inequalities exist between the most and least deprived areas. Planning should aim to contribute to the health priorities for the area, in particular tackling obesity.
- Population: Stratford-on-Avon is experiencing an ageing population, which will have implications for health service provisions and accessibility to services, facilities and amenities. The District is likely to experience an increasing proportion of the population with dementia, and an increasing dependency ratio.
- Housing: Market housing in the District is the least affordable in Warwickshire. There is also a considerable under-provision of affordable homes compared with the level of need.
- Quality of Life: The development of a high quality and multifunctional green infrastructure network in the District will be a key contributor to quality of life for residents.
- Out-commuting: Whilst the District has low unemployment and a higher proportion of the workforce working in higher paid professions, many of these jobs are located outside of the District, contributing to a high degree of out-commuting.
- In-commuting: A high degree of in-commuting is experienced in the District of people in lower paid jobs who are unable to afford local housing.
- Access to Work: There is a considerable mismatch between the average earnings of local residents and house prices.
- Communications Infrastructure: The quality of broadband provision in rural areas of the District varies. There is significant scope to improve coverage and connection speeds.
- Tourism: This is a key sector within the District that is important for the local economy.
- Nationally Designated Nature Conservation Sites: This includes 37 SSSIs
- Potential Biodiversity Loss: There is the potential for biodiversity loss and habitat fragmentation as a result of growth pressures and development (e.g. increased recreational uses).
- Open Space and Green Infrastructure: There is a need for increased support and understanding of the role of GI in development.
- Protecting Watercourses: All the main rivers in the District are prone to flood risk. Fluvial flood risk is a significant issue for the District, and the

- risk has the potential to increase as a result of climate change.
- Protecting Ground Water: This includes mitigating surface water flood risk, and avoiding ground water pollution, especially in the identified Source Protection Zones.
- Improving Watercourses: The Water Framework Directive target is for all watercourses to reach 'good' quality status by 2021
- Agricultural Land Quality: It is important to protect and conserve the best and most versatile agricultural land.
- Improving Air Quality Management Areas: These affect the whole town of Stratford-upon-Avon and the centre of Studley.
- Congestion and Transport Emissions: Transport is the highest emitting sector in Stratford-on-Avon and growth needs to support a reduction in emissions targets, for example in promoting alternatives to the private car, and mixed-use development.
- Quality Design & Retaining Distinctiveness: Development requires design that is sensitive to the receiving environment and protects the integrity of areas, especially in designated areas like the Cotswolds AONB. There is a potential for development to detract from the style and distinctiveness of some rural areas with the closure of local quarries, and the lack of availability of the existing local stone.
- Conservation & Enhancement of Cultural Heritage Assets: This includes the appropriate sites assessments where necessary e.g. an archaeological assessment in areas where the local archaeology is unknown, and extends to non-designated assets
- Increasing Renewable and Low Carbon Energy Production and Use: Significant opportunities exist in the District for increasing the capacity and type of renewable energy sources.
- Fuel and Water Poverty: The District has the fourth highest level of fuel poor households in the region. The number of water poor households is likely to increase as water bills rise.

#### Likely Evolution of Baseline Conditions without the SAP

- 3.14 Without the SAP there is less likely to be a coordinated approach to the delivery of new housing development. New development is less likely to be delivered in areas where it is needed most; it could also reduce opportunities to address existing issues, such as out-commuting for employment needs. New development can be planned to ensure accessibility and increase opportunities for healthy and active lifestyles. Without a Plan in place development is less likely to deliver health benefits. There could be an increased likelihood of negative effects on Green Infrastructure networks. Without the Plan, the cumulative effects of development on biodiversity are unlikely to be addressed and the national aim of no net loss is less likely to be achieved through a lack of coordinated planning of development, with missed opportunities to improve habitat connectivity.
- 3.15 Without the Plan, future development has an increased likelihood of resulting in negative effects on landscape and settlement character. Without the Plan,

Stratford-on-Avon Site Allocations Plan: Preferred Options Sustainability Appraisal Report

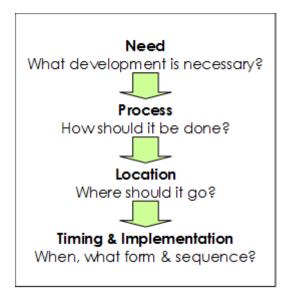
designated heritage assets would still be protected through national and local policy; however, undesignated heritage assets, heritage settings and potential archaeology could be more vulnerable to the impacts of new development.

# 4.0 CONSIDERATION OF PLAN-MAKING OPTIONS & ALTERNATIVES IN SA/SEA

#### Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive<sup>28</sup> 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. The reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term "reasonable alternative" but 'reasonable' is considered to be realistic and deliverable. The NPPF (paragraph 32) requires that a Sustainability Appraisal which meets the requirements of the SEA Directive should inform the plan throughout its preparation.
- 4.2 The identification of reasonable alternatives acknowledges a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the "big issues" are kept clear; only the main differences between alternatives need to be documented, i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. The hierarchy of alternatives may be summarised in the following diagram:

Figure 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making



4.3 Case law and continuing good practice in SA/SEA has informed Government guidance<sup>29</sup> on the identification and assessment of alternatives in planmaking. Reasonable alternatives should be identified and considered at an

soa276\_August 2020 43/131 Enfusion

<sup>28</sup> http://ec.europa.eu/environment/eia/sea-legalcontext.htm

<sup>&</sup>lt;sup>29</sup> https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal (revised 2014 & 2019)

early stage as the assessment of these should inform the local planning authority in choosing its preferred approach. Forecasting and evaluation of the significant effects should help to develop and refine the proposals in each Local Plan document.

4.4 UK SA/SEA guidance<sup>30</sup> advises that

"The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. (The same level of detail should be employed for each alternative option).

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.

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."

## **Assessment of Options in Plan-Making**

- 4.5 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by local authorities through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.6 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution, and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy) rather than a clear spatial expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus, the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.

<sup>30</sup> https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

- 4.7 At the later and lower levels of development planning for site allocations, options assessment tends to be more specific, often focused on criteria and thresholds, such as land availability, accessibility to services, and impacts on local landscape and particularly informed by technical studies such as the Strategic Housing Land Availability Assessment (SHLAA). There is a hierarchy of options assessment, with sites that are not viable or deliverable or might have adverse effects on protected environmental assets rejected at an early stage.
- 4.8 The role of the SA is to inform local authorities in their selection and assessment of options; SA is undertaken of those reasonable alternatives (options) identified through the plan-making process. The findings of the SA can help with refining and further developing these options in an iterative and ongoing way. The SA findings do not form the sole basis for decision making this is informed also by planning and other studies, feasibility, and consultation feedback.

### Options for the Site Allocations Plan (SAP)

- 4.9 The requirement, context, and principles for the SAP are set out in Core Strategy Policies CS.15 and CS.16.D, such that options are limited at this lower level of planning. However, the revised scope of the SAP includes certain options and questions for consultation and these have been considered through the SA, as follows:
- 4.10 **Defining Settlement Boundaries**: At the previous SAP scoping stage consulted on during August-September 2014, a wide range of comments was received including:
  - Boundaries should not be drawn too tightly but enable a degree of flexibility rather than restrict or limit development
  - Boundaries should not be drawn too loosely as this could imply that every site within the boundary was suitable for development
- 4.11 Whilst the principle of using BUABs has been established through Policy CS.16 as a mechanism for managing the location of development (and this was subject to SA), the Council decided that it would be appropriate at the revised scoping stage to investigate through strategic SA three options as set out in the table 4.1, as follows:

Table 4.1: Options for Defining BUABs

Option Number	Approach to Defining Built-Up Area Boundaries (BUABs)
1	Boundary drawn tightly around physical confines of settlement, in particular with regard to the existing built up areas
2	Boundary drawn loosely around settlement allowing space for development, particularly around the edges of existing built up areas
3	No boundary

The SA considered these approaches for Stratford-upon-Avon, the Main Rural Centres, and the Local Service Villages, recognising the different characteristics, constraints, and opportunities for these different types of settlement. These options were subject to consultation in 2017 and 2019.

- 4.12 Scale of Reserve Sites: The revised scoping of the SAP (February 2018) invited consultees to comment on whether reserve sites should be identified to have the capacity to provide in the region of 2,920 or 1,320 dwellings, or some other number of dwellings. Policy CS.16 specifies that reserve sites should have the capacity to deliver up to 20% of the District's total housing requirement to 2031 – this equates to 2,920 dwellings. However, at 31 March 2017, the housing supply over the plan period was already 1,600 dwellings over the requirement, indicating that only a further 1,320 dwellings need to be identified. It is somewhat unclear as to what might be reasonable alternatives to test through SA, particularly at this stage with no locational specificity, and there can be no certainty for any SA regarding any other, as yet undefined, number of dwelling. Therefore, the SA considered the likely significant effects through a high-level assessment using professional judgement for a comparative assessment between Options X and Y. It should be noted that Policy CS.16 was subject to previous SA and the specification to deliver up to 20% as reserve sites (ie 2,920 dwellings) has been found to be sound and sustainable.
- 4.13 The scale of the reserve sites was reconsidered in 2020 and two options were tested through SA as set out in table 4.2, as follows:

Table 4.2: Options for Scale of Reserve Housing (2020)

Scenario X	2,920 dwellings on reserve sites Calculated as 20% of the total housing requirement to 2031 as set out in the adopted Core Strategy Policy CS.16 Housing Development
Scenario Y	2,352 dwellings on reserve sites Calculated as 20% of Local Housing Need (LHN) as identified through the LHN Standard Methodology

- 4.14 **Proposals for Specific Sites**: Since the Core Strategy was adopted in 2016, circumstances have changed in the District, in particular for the allocated strategic sites. Therefore, the Council took the opportunity in 2017 to update and amend the provisions for two Proposals, and to suggest six options for proposed new allocations, as follows:
  - Amended Proposals: SUA.2 South of Alcester Road, Stratford-upon-Avon; SUA.4 Atherstone Airfield
  - New Proposals: SUA.5 East of Shipston Road, Stratford-upon-Avon; Land at Napton Brickworks; Land at University of Warwick, near Wellsbourne;

Land at Priory Square, Studley; Land at High Street, Studley; Land between Rother Street & Grove Road, Stratford-upon-Avon

Each of these options was subject to SA using the full SA Framework and subject to consultation in 2017 and again, in 2019.

- 4.15 Additional Proposals emerged since the Revised Scoping & Initial Options that the Council also considered to be appropriate for inclusion in the SAP, as follows:
  - Gateway Cultural Quarter, Stratford-upon-Avon
  - Quinton Rail Technology Centre
  - A46 Safeguarding: A422 Wildmoor & A3400 Bishopton
  - Land East of Shipston Road, Stratford-upon-Avon (mixed-use)
  - Land at Stratford-upon-Avon College, Alcester Road, Stratford-upon-Avon
  - Long Marston Airfield Phase 1b
  - Former Long Marston Depot Phase 5
  - Bidford Centre, Bidford-on-Avon

These options were subject to SA using the full SA Framework of objectives – details of findings provided in Appendix IV. An initial list of specific site proposals was subject to consultation in 2017 and 2019.

4.16 Options for Identifying Reserve Sites, Scenarios A-H: Policy CS.16 specifies that reserve sites should have the capacity to deliver up to 20% of the District's total housing requirement to 2031 – this equates to 2,920 dwellings. The SHLAA process identified Amber site options that would provide in excess of this required capacity for reserve housing in the District. Therefore, to develop a preferred approach, the Council identified eight Scenarios that investigated including all other site proposals (the base scenario) whilst excluding certain Amber site options. These Scenarios were developed from the initial Scenarios that had been investigated and consulted upon in late 2019. As a result of representations and review, appropriate scenarios to test through SA were identified and refined through an iterative process between the planning and SA teams. The Scenarios A-H were identified to be the reasonable alternatives that should be investigated through SA, as follows:

Table 4.3: Scenarios A-H

144515 1101 00 011411100 71 11		
Scenario A	Do Nothing	
Scenario B	Cumulative: Base Scenario and include all Amber SHLAA Sites	
(5,113		
dwellings)		
Scenario C	Base Scenario and exclude Amber Sites in Local Service	
(2,859	Villages (LSVs) & Large Rural Sites (LRSs): Alderminster, Bishops	
dwellings)	Itchington, Clifford Chambers, Ettington, Fenny Compton,	
	Gaydon, Halford, Hampton Lucy, Harbury, Ilmington,	
	Lighthorne, Long Itchington, Loxley, Mappleborough Green,	

Scenario D (3,658 dwellings)	Moreton Morrell, Napton-on-the-Hill, Newbold-on-Stour, Oxhill, Pillerton Priors, Priors Marston, Quinton, Salford Priors, Stockton, Tiddington, Tredington, Welford-on-Avon  Base Scenario and exclude Amber Sites with capacity under 30 dwellings
Scenario E (2,285 dwellings)	Base Scenario and exclude Amber Sites with capacity under 100 dwellings
Scenario F (2,421 dwellings)	Base scenario and exclude Amber sites that are in settlements covered by made Neighbourhood Development Plans or Examiner's Report recommends proceed to Referendum: Alcester, Bidford-on-Avon, Ettington, Harbury, Ilmington, Kineton, Long Compton, Loxley, Salford Priors, Shipston-on-Stour, Stratford-upon-Avon (including Tiddington), Welford-on-Avon, Wellesbourne
Scenario G (3,833 dwellings)	Base Scenario and exclude Amber sites in LSVs that have exceeded dwelling provision in Policy CS.16 based on all commitments & completions: Alderminster, Bishops Itchington, Ettington, Fenny Compton, Gaydon, Harbury, Long Itchington, Long Marston, Newboldon-Stour, Oxhill, Salford Priors, Stockton, Welford-on-Avon
Scenario H (2,920 dwellings)	Base Scenario plus Amber Sites apportioned according to the % distribution of the Core Strategy requirement – Main Town (965); Main Rural Centres (1,047); New Settlements (0); LSV1 (124); LSV2 (193); LSV3 (124); LSV4 (124); Large Rural Sites (equates to Large Rural Brownfield in the CS) (343); and rural elsewhere (0)

Each of these scenarios was subject to SA using the full SA Framework – in a comparable manner and to the same level of detail; SA findings are in this SA Report at Appendix VIII.

- 4.17 **Options for Reserve Housing Sites**: All options that are considered to be reasonable alternatives i.e. Amber<sup>31</sup> through the SHLAA process, were subject to SA using the full SA Framework, including grouping options within settlements so that inter-relationships and the potential likely significant cumulative effects may be more clearly identified. Initial findings were presented as Appendix VIII to the SA Report (June 2019) and subject to consultation. The SA of these Amber site options were updated and are detailed in this SA Report at Appendix VIII.
- 4.18 Options for the Identifying Reserve Sites, Scenarios 1-5: The high level scenarios A-H were refined in order to develop a meaningful tranche of scenarios that included some spatial specificity. The implications for each Scenario1-5 (please see Appendix IX) were tested taking into consideration

<sup>31</sup> Please note that there were no Green sites identified through the SHLAA process

the findings of the SAs of the Amber sites (please see Appendix VIII). The scenarios tested are as follows:

Table 4.4: Scenarios 1-5

Scenario 1	Cumulative: Base Scenario of all other Site Proposals - plus all	
(5,113	Amber sites	
dwellings)		
Scenario 2a (4,485 dwellings)	Base Scenario of all other Site Proposals - plus all Amber sites but exclude sites in LSV Category 4. Include: LSV Category 1 <sup>32</sup> ★: Bishop's Itchington, Harbury, Long Itchington, Quinton, Tiddington LSV Category 2: Brailes, Fenny Compton, Lighthorne Heath,	
	Napton-on-the-Hill, Salford Priors, Stockton, Tysoe, Welford- on-Avon, Wilmcote, Wootton Wawen LSV Category 3: Claverdon, Earlswood, Ettington, Great Alne, Ilmington, Long Compton, Newbold-on-Stour, Snitterfield, Temple Herdewycke, Tredington	
Scenario 2b (4,339 dwellings)	Base Scenario of all other Site Proposals - plus all Amber sites but exclude sites in LSV Category 3 & 4. Include: LSV Category 1 *: Bishop's Itchington, Harbury, Long Itchington, Quinton, Tiddington LSV Category 2: Brailes, Fenny Compton, Lighthorne Heath, Napton-on-the-Hill, Salford Priors, Stockton, Tysoe, Welford-on-Avon, Wilmcote, Wootton Waven	
Scenario 2c (3,805 dwellings)	Base Scenario of all other Site Proposals - plus all Amber sites but exclude sites in LSV Category 2, 3 & 4 Include: LSV Category 1 *: Bishop's Itchington, Harbury, Long Itchington, Quinton, Tiddington	
Scenario 2d (2,859 dwellings)	Base Scenario of all other Site Proposals - plus all Amber sites but exclude Large Rural Sites <sup>33</sup> & sites in LSV Category 1, 2, 3 & 4	
Scenario 3a (3,659 dwellings)	Base Scenario of all other Site Proposals - plus all Amber sites but exclude sites with capacity <30 dwellings	
Scenario 3b (2,285 dwellings)	Base Scenario of all other Site Proposals - plus all Amber sites but exclude sites with capacity <100 dwellings	
Scenario 4 (2,421 dwellings)	Base Scenario plus all Amber sites but do not include sites that are in made Neighbourhood Development Plans or those that are recommenced to proceed to Referendum & that already have identified reserve sites. This means removing all Amber sites in 13 settlements: Alcester, Bidfordon-Avon, Ettington, Harbury, Ilmington, Kineton, Long Compton, Loxley, Salford Priors, Shipston-on-Stour, Stratford-upon-Avon (including Tiddington), Welford-on-Avon,	

 $<sup>^{32}</sup>$  \* LSV Category 1 includes the 2 LRSs because the LRS at the former Harbury works is located near Bishops Itchington & the former Long Marston Depot is akin to a LSV Category 1 due to its size & range of services

<sup>33 •</sup> Large Rural Sites (LRSs) = North of former Harbury Cement works; Adjacent to former Long Marston Depot

	Wellesbourne
Scenario 5 (3,396 dwellings)	Base Scenario plus all Amber sites but do not include sites in LSVs that have exceeded dwelling provision in Core Strategy Policy CS.16. Include: Alderminster, Bishops Itchington, Ettington, Fenny Compton, Gaydon, Harbury, Long Itchington, Long Marston, Newboldon-Stour, Oxhill, Salford Priors, Stockton, Welford-on-Avon

Each of these scenarios was subject to SA using the full SA Framework – in a comparable manner and to the same level of detail; SA findings are in this SA Report at Appendix X.

4.19 **Options for the Large Rural Sites (LRSs)**: The Council reconsidered the suitability and availability of large rural sites in the district in 2020. A systematic assessment was undertaken taking into account key factors relevant to each site and including deliverability within the next 5 years. A summary of the findings of this refreshed assessment is as follows:

Table 4.5: Large Rural Sites Assessment

Table 4.5: Large Kurai Sites Assessment			
Site Ref;			
Location			
No of Dwellings	Key Factors	Conclusion	
LSL.01 Dallas Burston Polo Grounds, Southam (700)	<ul> <li>Significant landscape impact due to open countryside location</li> <li>About 1.5km from edge of Southam so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> <li>Limited capacity on road network into Leamington</li> <li>Affected by construction of HS2</li> </ul>	Could not be delivered within next 5 years due to highway, education and HS2 constraints. Strategic location that should be considered through Core Strategy review process.	
LSL.02 Lower Farm, Stoneythorpe, Southam (800)	<ul> <li>Significant landscape impact due to open countryside location</li> <li>About 1.5km from edge of Southam so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> <li>Limited capacity on road network into Leamington</li> <li>Affected by construction of HS2</li> </ul>	Could not be delivered within next 5 years due to highway, education and HS2 constraints. Strategic location that should be considered through Core Strategy review process.	
LSL.03A Former Southam Cement Works (300)	<ul> <li>Mostly brownfield so principle of development can be considered against Core Strategy Policy AS.11</li> </ul>	Could not be delivered within next 5 years due to viability and education constraints.	

	<ul> <li>Important ecological features partly designated as LWS</li> <li>Affected by cost of relocating operational quarrying equipment</li> <li>Contamination would need to be treated comprehensively</li> <li>Schools and other local</li> </ul>	Not appropriate as a reserve site as it could be considered on its merits against Policy AS.11.
LSL.03B North of Former Southam Cement Works (450)	facilities do not have capacity  Sensitive landscape which contributes to setting of Long Itchington  Out of scale with character of Long Itchington  About 1.5km from edge of Southam so not readily accessible by foot or cycle  Schools and other local facilities do not have capacity	Could not be delivered within next 5 years due to education constraints. Strategic location (in conjunction with LSL.03A) that should be considered through Core Strategy review process.
LSL.03C West of Southam Road, Long Itchington (1,000)	<ul> <li>Significant landscape impact due to open countryside location</li> <li>About 1.5km from edge of Southam so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> <li>Limited capacity on road network into Leamington</li> </ul>	Could not be delivered within next 5 years due to highway and education constraints. Strategic location (in conjunction with LSL.03D) that should be considered through Core Strategy review process.
LSL.03D South of Model Village, Long Itchington (350)	<ul> <li>Sensitive landscape which makes a major contribution to gap between Long Itchington and Southam</li> <li>Would subsume community of Model Village</li> <li>About 1.0km from edge of Southam so not readily accessible by foot or cycle</li> <li>Schools and other local facilities do not have capacity</li> <li>No highway access in its own right</li> </ul>	Could not be delivered within next 5 years due to highway and education constraints. Strategic location (in conjunction with LSL.03C) that should be considered through Core Strategy review process.
LSL.04A	<ul> <li>Significant landscape impact</li> </ul>	Could not be delivered

South of Deppers Bridge, Harbury (780)	<ul> <li>due to open countryside location</li> <li>About 2.0km from edge of Southam and 1.5km from edge of Bishop's Itchington so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> <li>Would subsume community of Deppers Bridge</li> </ul>	within next 5 years due to education constraints. Major impact on landscape character.
LSL.04B North of former Harbury Cement Works (210)	<ul> <li>About 3.0km from edge of Southam and 1.0km from edge of Bishop's Itchington so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> <li>Limited landscape impact as relatively small-scale, visually contained, and adjacent to current development</li> </ul>	Capable of being delivered within next 5 years. Appropriate to be identified as a reserve site
LSL.05 Wellesbourne Airfield (1,500)	<ul> <li>Core Strategy Policy AS.9 expects Airfield to remain operational</li> <li>Significant landscape impact due to open countryside location</li> <li>Limited existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> <li>Limited capacity on road network into Stratford</li> </ul>	Retention of airfield is a policy objective of District Council. Could not be delivered within next 5 years due to highway and education constraints.
LSL.06A Former Long Marston Depot (270)	<ul> <li>Brownfield site</li> <li>Adjacent to ongoing development at Meon Vale</li> <li>Existing facilities available at Meon Vale</li> <li>Limited capacity on road network into Stratford</li> </ul>	Principle of housing development is acceptable because brownfield land so not appropriate to identify as a reserve site
LSL.06B Adjacent former Long Marston Depot (90)	<ul> <li>Adjacent to ongoing development at Meon Vale</li> <li>Limited landscape impact because relatively small-scale</li> <li>Accessible to facilities at Meon Vale</li> </ul>	Capable of being delivered within next 5 years. Appropriate to be identified as a reserve site.

		T
LSL.07 Feldon Valley Golf Club, Sutton-under- Brailes (500)	<ul> <li>Remote from sources of housing need in Stratford District</li> <li>Within Cotswolds AONB</li> <li>Significant landscape impact due to open countryside location</li> <li>No facilities nearby</li> </ul>	No justification for large-scale housing development within AONB
	Served only by rural roads	
LSL.08 Four Shires Farm, Moreton-in- Marsh (700)	<ul> <li>Remote from sources of housing need in Stratford District</li> <li>About 1.5km from edge of Moreton-in-Marsh so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> </ul>	No justification for large-scale housing development in this part of Stratford District.
LSL.09		Green Belt review
West of Alcester (3,000)	<ul> <li>Within Green Belt</li> <li>Significant landscape impact due to open countryside location</li> <li>Close to edge of Alcester but no existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> </ul>	needed to justify consideration of site.
LSL.10 North of Wootton Wawen (1,000)	<ul> <li>Within Green Belt</li> <li>Significant landscape impact due to open countryside location</li> <li>About 1.5km from edge of Henley-in-Arden so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> </ul>	Green Belt review needed to justify consideration of site.
LSL.11A South of Bidford- on-Avon (1,700)	<ul> <li>Significant landscape impact due to open countryside location</li> <li>Bulk of site is about 1.0km from edge of Bidford-on-Avon so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> <li>Served only by rural roads</li> </ul>	Could not be delivered within next 5 years due to highway and education constraints. Major impact on landscape character.

	T	T
	<ul> <li>No suitable river crossing to access main road network</li> </ul>	
LSL.11B Bickmarsh Hall Farm, south of Barton (1,000)	<ul> <li>Significant landscape impact due to open countryside location</li> <li>About 1.5km from edge of Bidford-on-Avon so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> <li>Served only by rural roads</li> <li>No suitable river crossing to access main road network</li> </ul>	Could not be delivered within next 5 years due to highway and education constraints. Major impact on landscape character.
LSL.12 Atherstone Airfield (350)	<ul> <li>Significant landscape impact due to open countryside location</li> <li>About 2.0km from edge of Stratford so not readily accessible by foot or cycle</li> <li>No existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> <li>Limited capacity on road network into Stratford</li> </ul>	Could not be delivered within next 5 years due to highway and education constraints. Strategic location that should be considered through Core Strategy review process.
LSL.13 North of Station Road, Claverdon (700)	<ul> <li>Within Green Belt</li> <li>Significant landscape impact due to open countryside location</li> <li>About 5.0km from edge of Henley-in-Arden so not accessible by foot or cycle</li> <li>Limited existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> </ul>	Green Belt review needed to justify consideration of site.
LSL.14 North of Station Road, Long Marston (2,300)	<ul> <li>Situated between Meon Vale and Long Marston Airfield</li> <li>Close to facilities at Meon Vale</li> <li>Schools and other local facilities do not have capacity</li> <li>Limited capacity on road network into Stratford</li> </ul>	Could not be delivered within next 5 years due to highway and education constraints and size of site. Strategic location that should be considered through Core Strategy review process

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LSL.15 South of Henley Road, Mappleborough Green (500)	<ul> <li>Within Green Belt</li> <li>Significant landscape impact due to open countryside location</li> <li>About 0.5km from edge of Redditch but no existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> </ul>	Green Belt review needed to justify consideration of site.
LSL.16 Alcester Road, Stratford-upon- Avon (750)	<ul> <li>Significant landscape impact due to open countryside location</li> <li>About 1.0km from edge of Stratford but no existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> </ul>	Could not be delivered within next 5 years due to education constraints. Strategic location that should be considered through Core Strategy review process.
LSL.17 Stratford Agripark, Clifford chambers (750)	<ul> <li>Partly brownfield site</li> <li>Adjacent to Long Marston Airfield</li> <li>About 2.0km from Meon Vale but no existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> <li>Limited capacity on road network into Stratford</li> </ul>	Could not be delivered within next 5 years due to highway and education constraints. Strategic location that should be considered through Core Strategy review process.
LSL.18 West of Campden Road, Long Marston (2,000)	<ul> <li>Significant landscape impact due to open countryside location</li> <li>Adjacent to Long Marston Airfield</li> <li>About 3.0km from Meon Vale but no existing facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> <li>Limited capacity on road network into Stratford</li> </ul>	Could not be delivered within next 5 years due to highway and education constraints and size of site. Strategic location that should be considered through Core Strategy review process.
LSL.19 Glebe Farm, Sambourne (250)	<ul> <li>Within Green Belt</li> <li>Significant landscape impact due to open countryside location</li> <li>About 1.0km from edge of Astwood Bank but no existing</li> </ul>	Green Belt review needed to justify consideration of site.

	facilities nearby	
	Served only by rural road	
LSL.20 Blue Lias Works, Long Itchington (250)	<ul> <li>Partly brownfield site</li> <li>Affected by heritage and natural assets</li> <li>Close to edge of Long Itchington but no existing facilities nearby apart from primary school</li> <li>Schools and other local facilities do not have capacity</li> </ul>	Principle of housing development on brownfield part of site is acceptable
LSL.21 Former Napton Brickworks (90)	<ul> <li>Partly brownfield</li> <li>Affected by natural assets</li> <li>Impact of adjacent business uses</li> <li>Relationship to Napton village</li> </ul>	Principle of housing development on brownfield part of site is acceptable.
LSL.22 Rumbush Lane, Earlswood (1,175)	<ul> <li>Within Green Belt</li> <li>Significant landscape impact due to open countryside location</li> <li>No facilities nearby</li> <li>Schools and other local facilities do not have capacity</li> <li>Served only by rural roads</li> <li>Close to Earlswood rail station</li> </ul>	Could not be delivered within next 5 years due to infrastructure constraints. Strategic location that should be considered through Core Strategy review process.

- 4.20 Table 4.5 outlines the reasons for the selection or rejection of large sites; it explains the reasoning for most sites not being suitable or deliverable for the SAP, and it explains why 2 sites are considered to be reasonable alternatives that should be investigated through the SA process.
- 4.21 Many of the large sites could not be delivered within the next 5 years due to various constraints but most could be considered through the Core Strategy review process in due course. There is no justification of large-scale housing development in the AONB for one site, and Green Belt Review would be needed for 5 sites.
- 4.22 For 3 sites Former Long Marston Depot; Blue Lias Works, Long Itchington; and the former Napton Brickworks the principle of housing development is acceptable because the land is brownfield and therefore, it is not appropriate to identify these sites as potential reserve sites.
- 4.23 Two sites were found to be deliverable within the next 5 years and appropriate to be considered as reserve sites north of former Harbury Cement Works (250 dwellings) and Adjacent former Long Marston Depot (90 dwellings). Therefore, these two large sites were considered to be reasonable

alternatives and were progressed further through SA testing as they are deliverable in the next 5 years, are appropriate to identify as reserve sites, and do not have any major significant constraints.

- 4.24 **Self-Build & Custom Housebuilding Options SB1-SB5**: At the early stages of plan-making, three options for sites were initially put forward by landowners/developers for the specific purpose of self-build/custom housebuilding, as follows:
  - Land east of Shipston Road<sup>34</sup>, Alderminster (approx.10-15 plots)
  - Land west of Bush Heath Lane, Harbury (approx. 6 plots)
  - Land west of Glebe Close<sup>35</sup>, Stockton (approx. 10-15 plots)

Each of these options was subject to SA using the full SA Framework and subject to public consultation during February-March 2018. These sites have continued to be progressed as the SAP has been further developed because they remain suitable and deliverable.

- 4.25 A further 6 site options became available in 2019 after the 2018 consultations, as follows:
  - North of Allimore Lane, Alcester (approx. 15 plots)
  - South of Church Street, Hampton Lucy (approx. 10 plots)
  - North of Collingham Lane, Long Itchington (approx. 10 plots)
  - North of Dog Lane, Napton-on-the-Hill (approx. 5 plots)
  - West of Coventry Road, Southam (approx. 10 plots)
  - North of Millers Close, Welford-on-Avon (approx. 10 plots)
- 4.26 A further 2 site options became available in 2020, as follows:
  - West of Evesham Road (south), Salford Priors
  - North of Walton Road, Wellesbourne
- 4.27 These were investigated through the site assessment/SHLAA process and found to be Amber i.e. reasonable alternatives and therefore, all six were tested through SA using the full SA Framework and in a comparable manner to the previous SA. They were subject to consultation during August-October 2019. Five of these sites have continued to be progressed in the Preferred Options SAP in 2020 as they remain suitable and have been confirmed to be available and thus deliverable. The site at Hampton Lucy has not been progressed further as there are concerns about impacts on the historic environment. A new site in Halford at North of Idlicote Lane was identified in 2020 and was subject to SA in a comparable manner. The SA findings from

<sup>34</sup> Please note this site was subsequently progressed as Land east of Skylark Road

<sup>35</sup> Please note this site was subsequently progressed as Land west of Jubilee Fields

2017 & 2019 remain valid and relevant; they are detailed in this SA Report at Appendix XII.

## The Do-Nothing Scenario

4.28 It may be noted that "doing nothing" is not a reasonable alternative for the Local Plan since the Council has a duty to plan positively for objectively identified needs for housing and employment land. However, the SA is required to investigate "the likely situation if the plan were not to be adopted" and this is set out explicitly as Scenario A in Appendix VII of this SA Report and the implications for the baseline conditions are described in section 3.

# 5.0 DEVELOPING THE STRATFORD-ON-AVON SITE ALLOCATIONS PLAN (SAP): 2017-2020

### Context & Developing the Plan during 2017, 2019 & 2020

- 5.1 The Council considered the comments received during consultations in 2018 and early 2019, together with the findings of the SA and other technical evidence, especially the Strategic Housing Land Availability Assessment SHLAA<sup>36</sup>. The Council identified seven Scenarios for identifying and releasing reserve sites that could meet with the requirements of Core Strategy Policy CS.16. These Scenarios were tested through SA and the findings helped inform an approach for the SAP that comprised Policies and Proposals and subject to consultation during autumn 2019.
- 5.2 As a result of further studies, updated evidence, and representation comments from consultees, the Council decided to further investigate strategic options for developing a strategy for identifying and releasing reserve sites, and to revisit the Preferred Options stage of plan-making in 2020. High level scenarios A-H were identified as possible approaches to identifying reserve sites and these were subject to SA. These scenarios were refined and further investigated as Scenarios 1, 2a-d, 3a-b, 4 & 5. This included consideration of the findings of the SAs of Amber sites by SA topic, by settlement, and possible cumulative effects for the district, as a whole. The methods are explained in sections 2 and 4, and the findings presented and discussed in this section 6.

# Representations to the SA Report (2017), SA Addendum (2019) & SA Report (2019)

- 5.3 The details of comments made on the Initial SA Report (December 2017), the SA Addendum Report (February 2019), and SA Report (June 2019) together with responses, are provided in Appendix VII of this SA Report. The statutory consultation bodies, Environment Agency and Historic England, provided comments on the revised scope and initial options for the SAP but no specific comments on the SA in 2017. Natural England (NE) indicated sources of information and suggested amendments to some of the SA Objectives No 3 Biodiversity; No 7 Natural Resources; and No 8 Reduce Pollution. It is noted that NE had previously provided comments on the SAP updated SA scoping in 2014, and these were incorporated into the final SA Scoping Report (December 2014).
- 5.4 An agent on behalf of four different developers made the same representation in respect of SA Objective No 4 Flooding, No 10 Transport, and No 13 Housing and the SA findings for the comparative assessment of the three strategic options for settlement (built up) areas BUABs. It was suggested in the representation that impacts should be neutral for all settlement

<sup>36</sup> https://www.stratford.gov.uk/planning-regeneration/shlaa.cfm

boundary options for SA No 4 since flood risk is managed through national policy and Core Strategy Policy CS4. This is agreed and the SA findings amended.

- 5.5 It was suggested that whilst a loose settlement boundary may result in additional traffic, the provision of additional land for development within revised development boundaries could also ensure that public transport services are maintained and/or enhanced through additional use by residents, resulting in a beneficial effect for SA No 10 Transport. The SA had found major positive effects for a tight boundary, minor positive effects for a loose boundary, and minor negative effects for no boundary. The SA assumed the thresholds of 400 and 800m as defined for identifying significance. It is accepted that the options assessed were approaches and that such distances are unknown at this stage. Therefore, there is some uncertainty and it was suggested that amending the SA findings to include such uncertainty with (?) would be appropriate.
- 5.6 It was asserted that drawing a tight settlement boundary is likely to restrict the ability of settlements to respond to development where need arises, and the impact could be neutral or even negative with regard to SA No 13 Housing. The Initial SA paragraph 5.9 noted that there is still some flexibility in the definitions of settlement boundaries. This SA had found minor positive effects for both the tight and loose boundaries; it found minor negative effects for no boundary. It is considered that these SA findings are still valid and relevant, and no amendments were made. The Council has applied a tight boundary approach in developing the final Pre-Submission Plan.
- 5.7 One representation to the SA Addendum requested that a health impact assessment should be undertaken of the proposals at the onset. It may be noted that SA Objective No 14 in the SA Framework seeks to safeguard and improve community health, safety and wellbeing. Each emerging element of the SAP has been tested through the SA Framework; thus, health impacts have been considered from the outset.
- 5.8 In response to the 2019 consultation, no specific comments were made by the Environment Agency or Natural England. However, Historic England was concerned that the SA matrices of sites indicate negative impacts and uncertain impacts on heritage at a number of sites with no clear evaluation of those impacts. The Council has undertaken additional heritage assessments to ensure that the requirements of the Core Strategy and NPPF are met; this evidence will inform the updating of the SA of sites.
- 5.9 The Cotswold Conservation Board was concerned about including reserve housing sites in the Cotswold AONB if they have been found to have negative effects through the SA. The Council has decided to not include four Amber sites that are located within the AONB in the draft SAP.
- 5.10 Some respondents identified errors or concerns with the findings of the SA of the Amber sites; any errors were corrected, explanations made, and further heritage assessments have been undertaken of certain sites to inform further SA and plan-making.

5.11 Some respondents were concerned that the SA had not investigated reasonable alternatives as fully as possible. The scenarios testing was extended to include all Neighbourhood Plans – made and agreed to progress to referendum. The scenarios testing was expanded to include testing of a range of options based on the settlement hierarchy. The scenarios were also extended and refined to consider the size of sites, including consideration of sites <30 dwellings and sites <100 dwellings. The Council also reconsidered its approach to the Large Rural Sites (LRSs).

## Defining Settlement Boundaries (BUABs) (2017)

5.12 The details of the SA findings for the three options identified for defining BUABs are set out in Appendix III of this SA Report. The SA considered options for boundary creation (tight; loose; none) around Stratford-upon-Avon, the Main Rural Centres, and the Local Service Villages. Summaries of the SA findings are presented in the Table 5.1, as follows:

Table 5.1: Options for Defining BUABs - SA Summary

	Boundary Options for Stratford-upon-Avon and Main Rural Centres			Boundary Options for Local Service Villages			
SA Objective	1.Tight Boundary	2.Loose Boundary	3.No Boundary	1.Tight Boundary	2.Loose Boundary	3.No Boundary	
1. Heritage	0	+	0ŝ	0	+	0ŝ	
2. Landscape	++	+	-	++	+	-	
3. Biodiversity & Geodiversity	+	+ŝ	0	+	+\$	0	
4. Flooding	0 • 37	0	0	0+	0	0	
5. C Change: Access & Traffic	+	0	-	+	0	-	
6. C Change: Gl	+	0ș	0ŝ	+	0ŝ	0ș	
7. Natural Resources	+	+ŝ	-	+	+ŝ	-	
8. Pollution (Air & Water Quality)	+	+	0	+	+	0	
9. Waste	0	0	0	0	0	0	

 $<sup>^{37}</sup> ullet$  SA findings amended to neutral as a result of Regulation 18 consultation comments

10. Transport	++ \$ <b>♦</b>	+ \$ <b>♦</b>	-\$ <b>♦</b>	+ș	+ș	<b>-\$</b> ◆38
11. Rural communities	N/A	N/A	N/A	N/A	N/A	N/A
12. Settlement Identity	+	0ŝ	-	+	0ŝ	-
13. Housing	+	+	-	+	+	-
14.Communities & Health	+	+\$	-	+	+ŝ	-
15. Economy & Employment	+	+	-	+	+	-

- 5.13 The SA process found that the enforcement of a tight boundary round Stratford-upon-Avon, the Main Rural Centres and Local Service Villages had the potential for a range of positive effects. A tight boundary around the settlements allows for increased control of where development can be located and can help retain the settlement characteristics and prevent unwanted urban sprawl. A tight boundary will still allow growth and can promote the use of brownfield land with associated positive effects. The tight boundary option is further assessed by theme below.
- 5.14 The SA found that using a looser boundary around settlements also had the potential for a range of positive effects. The boundary could still manage development in an integrated fashion that would likely benefit local communities, and still be flexible to allow suitable growth with new opportunities for settlements. However, unlike the tight boundary there remains some uncertainty regarding the potential effects, as development on the periphery of the settlements could lead to effects on landscape, access to services/facilities and sustainable transport.
- 5.15 The no boundary option was found to have a range of neutral and negative effects. With no boundary, the location of future development is more difficult to control, although any development would still need to comply with the Core Strategy and associated Policies. However, there is still the potential for minor negative effects on landscape, accessibility & traffic, agricultural land, housing, economy and employment and on the settlement identity through changes to the built form. This is likely to be more significant for the Local Service Villages where there are fewer services and facilities and are more sensitive to change. Although no boundary provides increased flexibility, development could affect local communities and settlement identities and an integrated approach to development is less achievable.
- 5.16 The Council decided that the preferred approach was to identify a tight boundary around the physical confines of settlements (Option 1), taking into account characteristics and local circumstances, including applying criteria for the type of land to be included or excluded. It was decided that Option 3 with no boundary would be difficult to manage/guide development in any

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 $<sup>^{38}</sup> ullet$  SA findings amended with uncertainty added as a result of consultation comments

integrated way with potential negative effects. Whilst Option 2 with a loose boundary provides scope for new development on the edges of settlements, many Local Service Centres have a dispersed settlement pattern. Progression of Option 1 also helps to protect important gaps; some settlements are comprised of distinct parts and separate boundaries have been drafted around each part. It should be noted that Policy CS.15 in the Core Strategy establishes the principle of defining settlement boundaries around their physical confines and this approach has been found sound.

- 5.17 The proposed preferred approach excludes land that is currently used for particular purposes, such as playing fields, modern agricultural buildings, miscellaneous uses such as sewage treatment works, electricity sub-stations (often located on the fringes of settlements), allotments, and manor houses/associated estate land. This provides mitigation measures that protect such land uses from potential new development with avoidance of likely negative effects.
- 5.18 Land proposed to be included within settlement boundaries comprises churchyards, community buildings & immediate curtilage, residential curtilage, and employment sites on the edge of a village. This recognises the characteristics of such land and acknowledges the possibilities for redevelopment as managed and guided through Core Strategy Policies with positive effects. The likely effects of the proposed preferred approach (Option 1; Tight Boundary) to defining BUABs may be summarised by sustainability theme, as follows:
- 5.19 Housing, Economy & Employment & Communities: Defining a tight boundary will have positive effects for housing through controlling the location of future development. The boundary will still allow for some flexibility in the location of housing development. The economy of settlements will benefit from a tight boundary, as development will have access to services/facilities and will support their viability, and access to employment opportunities. The inclusion of employment land within the boundary will also allow for regeneration or change of use, which can support local growth with positive effects.
- 5.20 A tight boundary will protect the existing built form of settlements with positive effects for settlement identities and local communities. Development is more likely to be integrated with the existing community within a tight boundary, and criteria can be used to avoid conflicting neighbouring land uses which could have effects on health.
- 5.21 **Transport, Air Quality & Climate Change:** A tight boundary is likely to result in development being well located to existing sustainable transport links (bus stops, cycle paths and footpaths) and be in walking distance to services/facilities. Therefore, this will reduce the reliance on private vehicle use with positive effects for both transport and air quality. The use of a tight boundary for Stratford-upon Avon and the Main Rural Centres could result in some site options having poor access to the highway network, however mitigation is available through Core Strategy Policies CS.25 and CS.26. Within the Local Service Villages residents are likely to still rely on private vehicles to access some key services, however air quality in the LSVs has not been

- identified as a significant issue, nor has congestion. The tight boundary can exclude public open spaces and areas of high Green Infrastructure value, which will protect these assets from development pressure.
- 5.22 **Historic Environment:** A tight boundary around settlements is likely to include designated heritage assets, specifically in Stratford-upon-Avon and the Main Rural Centres where there is a more diverse historic environment. However, a tight boundary provides the opportunity to avoid features where possible by factoring them into the criteria for defining the boundary. Development will still need to comply with Core Strategy Policy CS.8, which protects the heritage assets and their setting, and therefore no significant effects are considered likely.
- 5.23 Landscape & Soils: Positive effects for this theme are likely with the use of a tight boundary. Using a tight boundary will protect the surrounding landscape which can contribute to the character of the settlements. This includes designated landscape features, such as the AONB, and the Green Belt designation that seeks to avoid coalescence. The tight boundary can prevent erosion of landscape character on the edge of the settlement and prevent the loss of key settlement gaps.
- 5.24 By choosing a tight boundary loss of greenfield land will be limited, and there is the potential for higher levels of development on brownfield land within the boundary. Furthermore, this will protect areas of best and most versatile agricultural land with positive effects for soil resources. Furthermore, Mineral Safeguarded Areas can be avoided, with positive effects.
- 5.25 **Biodiversity & Geodiversity:** A tight boundary will protect local biodiversity and geodiversity by excluding designated sites and areas of Priority Habitat where possible. If there are areas of biodiversity value within the boundary, Core Strategy Policy CS.6 will provide mitigation and ensure any development does not have a significant effect.
- 5.26 Flooding & Water Quality: Flooding is an issue for many settlements within the District. A tight boundary can be drawn to avoid areas of flood risk, removing the potential for development to be inappropriately located, with associated positive effects. Furthermore, a tight boundary can protect water quality and water resources by circumventing areas which have a known water vulnerability or poor water quality status, and where development would likely exacerbate existing water resource issues or lead to a decline in water quality.

## Scale of Reserve Housing Sites (2018 & 2020)

5.27 There was much uncertainty in the comparative SA (2018) of the two options (2,920 and 1,320 dwellings) for reserve housing numbers. It should be noted that the higher housing number was previously subject to SA during the preparation of the Core Strategy. The third option that invites suggestion for some other level of housing is too uncertain and not possible to test through SA. Generally, higher numbers are likely to support SA Objectives on housing, services/facilities and may further support sustainable transport. There is the

potential for the higher numbers to have cumulative negative effects on environmental factors, but this depends upon locational specificity - and strong mitigation measures are available through Policies in the Core Strategy.

- 5.28 For option 1 (2,920 dwellings) the SA found that there will be enhanced positive effects for housing and potentially services/facilities through a larger provision for the District; however, both options will provide housing with positive effects. The higher level of proposed housing in option 1 has increased potential for negative effects on landscape quality and effects on biodiversity; however, with mitigation available through Core Strategy Policies it is expected that negative effects could be mitigated.
- 5.29 The higher housing numbers may also result in increased traffic on the highway network as a result of cumulative effects of development, and this could have associated effects on air quality and transport. It is not likely that there will be a significant difference in effects between the two options on heritage, flooding, green infrastructure, waste, settlement identities or economy and employment.
- 5.30 A further option for the scale of the reserve housing numbers was identified in 2020 and subject to SA. The previously preferred option of around 2,920 dwellings (calculated to deliver up to 20% of total housing as set out in the Policy CS.16 Housing Development) was assessed again using the full SA Framework of objectives and decision-aiding questions in a comparative strategic level SA with around 2,352 dwellings (calculated as 20% of Local Housing Need (LHN) as identified through the LHN standard method). The two options were named Scenario X and Scenario Y respectively.
- 5.31 As with the previous SA of numbers for reserve sites, there was much uncertainty in the findings as would be expected in such a high level assessment and with no locational specificity. The findings of the SA are detailed in Appendix VIIa of this SA Report. The SA findings are summarised in Table 5.2, as follows:

Table 5.2: Scenarios X-Y – SA Summary Findings

SA Objective	X: 2,920 dwellings	Y: 2,352 dwellings	
1. Heritage	0ŝ	0	
2. Landscape	-	-Ś	
3. Biodiversity & Geodiversity	+	+	
4. Flooding	0	0	

5. C Change: Access & Traffic	0ŝ		0	
6. C Change: GI	+		+ŝ	
7. Natural Resources	0	Oŝ	0	0
8. Pollution (Air & Water Quality)	0 0		0	0
9. Waste	0		0	
10. Transport	Oŝ		0	
11. Rural communities	+		+ŝ	
12. Settlement Identity	0ŝ		0	
13A. Housing – Total	++		++	
13B. Housing - Affordable	++		+	
14.Communities & Health	+		+	
15. Economy & Employment	+		+\$	

5.32 The Council decided to continue progressing an approach to positive planning for around 2,920 dwellings as this quantum aligns with the Core Strategy. Given that (a) the PPG is clear that LPAs should continue to use their adopted plan figures, (b) it is beyond the scope of the Site Allocations Plan to revisit the housing requirement, and (c) the SA/SEA shows that there is no significant difference between the two figures, it is considered appropriate to continue to use the 2,920 figure for the purposes of the Site Allocations Plan. Importantly, although the policy requires a quantum up to 20%, given these are reserve sites that will only come forward if needed, there is not considered to be any significant harm in seeking to provide the full 20%.

## Proposals for Specific Sites (2017, 2019 & 2020)

5.33 The details of the SA findings are presented in Appendix IV of this SA Report and summarised in the Table 5.3, as follows:

Table 5.3: Proposed Specific Sites – SA Summary (2017)

Table 5.3: Propo	osea sp	ecific 31	es – 3A	Summo	ry (2017	)		
Proposed Specific Sites /SA Objective	South of Alcester Road, Stratford	Atherstone Airfield	Land East of Shipston Road	Napton Brickworks	Warwick University, Wellesbourne Campus	Priory Square, Studley	Studley Enterprise Centre	Rother/Grove Street, Stratford-upon-Avon
1. Heritage	0	0	0	0	0	+	0	-ș
2. Landscape	-	-	-		+	++	+	+
3. Biodiversity & Geodiversity	0	0	0	-	0	0	0	+
4. Flooding	0	0	0	0	0	0	0	0
5. C Change: Access, Traffic	+	0	+	0	0	-	-	0
6. C Change: Gl	+	+	+	+	+	+	0	+
7. Natural Resources	0 -		 	0 +	0 +	0 + +	0 + +	0 + +
8. Pollution (Air Water Quality)	ŝ O	\$ 0	+ -	0 -	0 -			- 0
9. Waste	0	Ö	0	0	0	0	Ō	Ö
10. Transport	-		+	-	-	+	+	++
11. Rural communities	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
12. Settlement identity	-	+	+	-	+	++	+	+
13. Housing	0	0	0	++	0	+	0	Ś
14.Community & Health	0	+	+ŝ	0	0	0	0	+
15. Economy & Employment	++	0	0	0	+	+	+	Ś

5.34 The Specific Sites are a mix of employment and housing proposed development, with positive or neutral effects for these SA objectives according to proposed uses, which is to be expected. All sites have neutral effects on SA objectives for flooding and waste; likely effects on other SA objectives vary. Significant major negative effects are indicated for Napton Brickworks due to medium/high landscape sensitivity such that residential development could be inappropriate as there is no proposed mitigation indicated at this stage of assessment.

- 5.35 Major negative effects for SA objectives on natural resources are indicated for Atherstone Airfield and East of Shipston Road (Mineral Consultation /Safeguarded Area and loss of best and most versatile agricultural land). A major negative effect was also found for the Airfield site as there is a lack of services/facilities within sustainable transport distance and thus no reduced reliance on private vehicle use. The possibilities for mitigation measures are uncertain at this stage of assessment.
- 5.36 Major positive effects were found for landscape/townscape and soils SA objectives for Priory Square, Studley, as this is derelict brownfield land that does not contribute to the townscape; development would help resolve existing sustainability problems with positive effects that will be synergistic and cumulative in the local area. Similarly, major positive effects are identified for Studley Enterprise Centre, and Rother/Grove Street in Stratford-upon-Avon due to reuse of brownfield land. Major positive effects were found at this latter site also for SA objectives on transport as the site is near services/facilities and also close to a range of buses services and the railway station.
- 5.37 Since the earlier work on developing the SAP in 2017 and the consultation in the spring of 2018, additional specific proposals came forward that the Council considered should be appropriate to include in the SAP. These specific proposals comprise the following:
  - A. Birthplace/Gateway Cultural Quarter
  - B. Quinton Rail Technology Centre
  - C, D & E. Safeguarding Land for A46 Improvements: Junctions A46 & A422, A46 & A3400, A46 & A439
  - F. Employment Exceptions Site Policy

A further site became available in 2020 and was considered to be appropriate to include in the SAP:

- Bidford Centre, Bidford-on-Avon
- 5.38 The proposals were subject to full SA using the same SA framework and method of assessment. An overview of the relevant baseline characterisation was provided for each of the additional specific proposals (A-F). Assessment of significant effects was made using the same significance criteria negative/positive and major/minor, together with reporting of any gaps or uncertainties. Summary SA findings were provided with symbols and colours, and as follows:

Table 5.4: Additional Specific Proposals for SAP – Summary SA (2019 & 2020)

	Add	lition	al Sp	ecifi	c Pro	poso	als for	SAP	)					
SA Objective	A. Gateway/Cultural	Gateway/Cultural Quarter		recnnology Centre	C. A46	Safeguarding: Wildmoor	D. A46 Safeguarding:	Bishopton	E. A46 Sofequarding:	Marraway	F. Employment Exceptions Sites	Policy	Bidford Centre, Bidford-on-Avon	
1. Heritage	-		C	)	(	)	О	1	-		(	)	(	)
2. Landscape	+	-	+	-		+	Ś		,	Ş	(	)	-	+
3. Biodiversity & Geodiversity	+	-	C	)		-	-			-	(	)	(	)
4. Flooding	+		+	-	-	+	+		-	+	(	)	(	)
5. C Change: Access & Traffic	Ş	?	-	-		++		++		++		+		)
6. C Change: GI	+	-	+		0		0		0		0		-	+
7. Natural resources	0	++	0	+	0	-	0	-	-		0	-	0	++
8. Pollution (Air & Water Quality)	+	Ś	0	N A	+	NA	+	NA	+	NA	0	0	0	0
9. Waste	0		C	)	0		0		0		(	)	0	
10. Accessibility & Transport	+	+		-	-	+	+		-	+	-	+	-	+
11. Reduce barriers for rural communities	N/	A	0		-	+	+			+	(	)	N,	/A
12. Settlement Identity	+	++		+		ŝ		Ś		+		)	-	+
13. Housing	+	+		0		/A	N/A		N/A		N,	/A	(	)
14.Communities & Health	+	+		++		++		++		++		+	0	
15. Economy & Employment	+	+	+	+	+	+	++		++		++		+	

5.39 The approach and findings for sites A-G were published within a SA Addendum Report (February 2019) for consultation accompanying the SAP

Further Focused Consultation. The SA Addendum Report is part of this SA Report, presented at Appendix V and available on the Council's website <a href="https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan.cfm">https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan.cfm</a>. The findings for the additional site at Bidford Centre are detailed in Appendix IV Specific Sites of this SA Report.

## Developing the Proposed Approach to Identifying Reserve Housing Sites (2020)

5.40 The Revised Scoping for the SAP (2017) explained the context with the Core Strategy and Policies CS.15 and CS.16. It explained how the SHLAA will consider the availability, suitability, and achievability of site options. It proposed that the SAP will not identify any reserve sites in the Green Belt. It further proposed that the location and capacity of reserve sites should broadly follow the distribution of housing development established by principles in Policy CS.16 – this was subject to previous SA and found sound at examination.

## **Specific Site Proposals**

- 5.41 The Council considered the representations to the consultation in 2019 and decided to continue to progress the specific sites (as listed in Tables 5.3 & 5.4) as Proposals in the Preferred Options draft SAP in 2020 because they remain suitable and deliverable. One of the A46 safeguarding sites (E: Marraway) was not progressed any further due to concerns about impacts on the historic environment).
- 5.42 These specific site proposals and the Employment Enabling Sites Policy comprised the Base Scenario that was included in all the Scenarios (A-H & 1-5) for testing through SA to inform decision-making on the preferred approach to identifying and releasing reserve housing sites. The Base Scenario is as follows:

#### Table 5.5: Base Scenario

- South of Alcester Road, Stratford
- Land at Rother Street/Grove Street, Stratford
- Gateway Quarter, Stratford
- Land at Stratford-upon-Avon College, Alcester Road, Stratford
- Atherstone Airfield

- Bidford Centre, Bidford-on-Avon
- Land at High Street, Studley
- Studley Enterprise Centre
- Land at Napton Brickworks
- University of Warwick,
   Wellesbourne Campus
- Quinton Rail Technology Centre
- A46 Safeguarding sites A422

Land east of Shipston Road, Stratford	<ul> <li>Wildmoor, A3400 Bishopton</li> <li>Former Long Marston Depot Phase 5<sup>39</sup></li> <li>Long Marston Airfield Phase 1b<sup>40</sup></li> <li>Employment Enabling Sites Policy</li> </ul>

5.43 The details of the SA of the specific site proposals are in Appendix IV and the SA of the Base Scenario is set out in Appendix VIIb of this SA Report.

Table 5.6: Base Scenario – SA Summary Findings

SA Objective	Base Scenario	
1. Heritage	(	)
2. Landscape	T	+
3. Biodiversity & Geodiversity	+	Ś
4. Flooding	(	)
5. C Change: Access & Traffic	4	+
6. C Change: Gl	+	
7. Natural Resources	0	+/-
8. Pollution (Air & Water Quality)	0/+	0
9. Waste	(	)
10. Transport	+/	0s
11. Rural communities	0	Ś

<sup>&</sup>lt;sup>39</sup> Previously included as a potential reserve site (LMD.A) – part of a wider large rural brownfield site identified under CS Policy AS.11.

<sup>&</sup>lt;sup>40</sup> New site for the SAP but part of CS Proposal LMA for new settlement of 3,500 homes. Phase 1 for 400 homes & local centre has consent & construction has just commenced; recent transport modelling suggests that 400 plus around 550 could be built before a relief road is required.

12. Settlement	+
Identity	
13. Housing –	++
14.Communities	+
& Health	
15. Economy &	++
Employment	

The SA found mostly positive or neutral effects; there were no significant negative effects predicted. This is to be expected as the proposed sites have been discussed by the Council with the promoters and site-specific requirements have been developed to provide mitigation measures for any potential significant negative effects. The proposed housing and employment land will contribute to their sustainability objectives, in particular SA Nos. 13 & 15, with major positive effects that will be cumulative in the longer term. The sites are mostly dispersed through the District, minimising risk to any sensitive receptors, and with the small number and local capacities of the sites, there are no significant negative cumulative effects identified. The findings of the SA of these specific sites are still relevant and valid. The SA made several suggestions to enhance site specific requirements and this is discussed further in the following Section 6.

## Options for Identifying Reserve Housing Sites - Scenarios A-H

5.45 The detailed findings of the SA of Scenarios A-H is presented in Appendix VIIb of this SA Report. A summary of the SA findings is set out in Table 5.7, as follows:

Table 5.7: Scenarios A-H for the Strategy to Identify Reserve Sites - Strategic Sustainability Appraisal (SA) Summary

SA Objectives/ Scenario & Housing Capacity (subject to density)	1 Heritage		2 Landscape		3 Biodiversity &		4 Flooding	5 Climate Change - Traffic	6 Green Infrastructure		Agriculture	8 Air Quality	Water Quality	9 Waste	10 Accessibility & Transport	11 Rural Communities	12 Settlement	Identity	13A Housing	Overall	138 Affordable	Buisnou	14 Community & Health	15 Economy & Employment
A: Do Nothing		-?		-?	+	?	0	?	+?	0	-?	- - ?	0	0	?	-?	-	?	+	?	+?		+	+?
B: All SHLAA Amber Sites (5,113)		-?		-?	+	?	0	?	+	0	-?	- - ?	0	0	?	-?	-	?	+	+	++		+	+
C: Exclude Sites in LSVs & LRSs (2,859)	+	0 ?	+	- ?	+		0	+	+	0	+ -?	+	0	0	++?	-	+	0 ?	+ +	0	+ +	- ?	+	+
D: Exclude Sites with Capacity <30 dwellings (3,658)	(	0		-	+	?	0	?	+	0	-?	- - ?	0	0	-?	-?	0	?	+	+	+?		+	+
E: Exclude Sites with Capacity <100 dwellings (2,285)	(	0	0	)?	+	?	0	0?	+	0	0?	0 ?	0	0	+?	-?	(	)	+-	⊦?	++?	?	+	+
F: Exclude Sites in all settlements with made NDPs (2,421)	+	0	+	- ?	+		0	+ 0	+	0	0	0	0	0	0	+?	(	)	+ + ?	0	+ + ?	0	+	+
G: Exclude Sites in LSVs exceeded CS.16 (3,833)	+	0 ?	+	?	+	?	0	?	+	0	0	- ?	0	0	0?	+?	(	)	+	0	+ +	0	+	+
H: Sites apportioned by % in Core Strategy (2,920)	+	- ?	+	- ?	+ ?	+	0	+	+	0	+ - ?	+	0	0	++?	-	+	0 ?	+ +	+		+ ?	+	+

- 5.46 Housing, Economy & Employment, Communities & Health: Overall, each of the 8 scenarios are likely to have positive effects on SA objectives to provide affordable, environmentally sound, and good quality housing for all. For the Do Nothing Scenario 1, only minor positive effects are indicated as it is uncertain how much additional housing would be delivered without positive guidance. It is assumed that affordable housing would be included in line with Core Strategy CS.18 but not optimised as might be progressed with positive planning through scenarios B-H.
- 5.47 Major positive effects for housing are indicated for Scenario B (all Amber sites); for the higher categories of settlements (SUA & the MRCs) in Scenario C (but neutral for the rural settlements as these are excluded); for the options Scenarios D& E that exclude <30 or <100 dwelling sites; for settlements in Scenario F (except those with NPs that are excluded and therefore, are neutral); for settlements in Scenario G (except for those LSVs that have already exceeded dwelling provision in Policy CS.16 and thus effects are neutral); and for Scenario H (the limited housing numbers in the rural areas reduce the positive effects to minor).
- 5.48 With the split for SA No 13 into 13A Total Housing and 13B Affordable Housing, significant comparative differences are identified for Scenarios C, F, G and H. Exclusion of sites in the LSVs through Scenario C would exclude affordable housing in the rural areas, where it is perhaps most needed and therefore, minor negative effects are indicated. For Scenarios F and G, neutral effects for affordable housing for those categories of sites excluded. The limited housing numbers in the rural areas reduces the positive effects to minor for Scenario H.
- 5.49 The provision of good quality housing will contribute to long term minor positive effects on communities and their health for all scenarios. The provision of good quality housing will contribute to supporting the local economy and employment. However, as the scenarios are being investigated to develop a preferred strategy for identifying reserve housing sites, all scenarios were considered to be neutral as objectives for economy and employment were not direct comparative differentiators.
- 5.50 A particular aim for the SAP is to reduce barriers for those living in the rural areas and this considers factors that affect rural communities, such as access & facilities/services, sustainable transport and affordable housing. Most of the scenarios were found to have minor negative effects since Scenarios A-E & H variously exclude new development from the rural areas. Scenarios F and G were found to have likely minor positive effects due to the quanta of development proposed and the dispersal of sites through the rural areas.
- 5.51 An important factor for plan-making is to protect the character and separate identity of the District's settlements. Likely minor negative effects were indicated for Scenario A due to the absence of positive planning with potential for reserve sites to accumulate in certain areas with loss of identity. Also, there is a risk of some loss of identity for some settlements with the high quantum of 5,113 dwellings in Scenario B. Apportioning reserve sites to the

higher categories of settlements will mitigate potential negative effects on the LSVs to neutral by avoidance. There is uncertainty of effects for Scenarios D and E as these depend on sites and precise locations. Neutral effects are indicated for settlements with NDPs in Scenario F and certain LSVs in Scenario G; some uncertainty with Scenario G as the overall numbers are at 3,833 in excess of the need and effects will depend upon how sites are apportioned amongst the other settlements. Apportioning the reserve sites mostly (approximately 81%) within Stratford-upon-Avon (SUA) (965), the Main Rural Centres (MRCs)(1,047) & the Large Rural Sites (343) will limit the housing numbers amongst the LSVs & thus avoid potential negative effects with likely minor positive effects for the rural areas.

#### Transport, Air Quality & Climate Change

- 5.52 Transport and vehicular emissions are closely linked with air quality and contributions to climate change. In the Do Nothing Scenario there is uncertainty of effects as there is the potential for reserve sites to accumulate in certain areas that might exacerbate traffic and emissions. Major negative effects are also indicated for Scenario B for transport, air quality and climate change due to the high quantum of development at 5,113 in excess of needs. Mitigation possibilities include location of sites to avoid known areas of congestion and to focus on locations where more sustainable movement can be supported and encouraged. Major negative effects were found for Scenario D as the sites are more dispersed throughout the rural areas where opportunities to reduce use of private vehicles are less.
- 5.53 Minor positive effects are predicted for Scenarios C and H that focus development to the higher categories of settlements that are more able to support sustainable transport. Neutral effects are indicated for Scenarios E and F since the excluded settlements are fairly dispersed throughout the District.

#### **Historic Environment**

5.54 For Scenarios A and B, major negative effects are indicated as it could be difficult to manage incremental effects on the historic environment but with uncertainty as this depends on scale and precise locations. Minor positive effects are predicted for those categories of settlements excluded in Scenarios C, F, G and H as the historic environment will be protected through avoidance. Neutral effects are likely for those categories of settlements that would have development allocated through protection of Core Strategy policies including CS.8 and the Area Strategies (AS.1-AS.11).

#### Landscape & Soils

5.55 The District includes important areas of landscape and townscape character and sensitivity. For Scenarios A and B, major negative effects are indicated as it could be difficult to manage incremental effects on landscape/townscape. There is some uncertainty as it depends on sites and locations. Mitigation measures could comprise excluding those Amber Sites that are in areas of high landscape sensitivity since it would be reasonable to assume that

mitigation for major negative effects is likely to be difficult and/or expensive. They could comprise consideration of specific settlements where cumulative effects on landscape may be a particular issue through the high proportion of sites with potential major negative effects but the overall higher quantum of development in Scenario B is likely to have a cumulative negative effect on the landscape of the District. Potential minor negative effects for Stratford-upon-Avon and the Main Rural Centres for Scenarios C and H through the focus on these settlements – mitigation measures may be possible through site-specific requirements.

- 5.56 Minor positive effects for those categories of settlements that are excluded in Scenarios C (LSVs & LRSs), F (NDPs), G (LSVs that have exceeded dwelling provision), and H (focus on Main Town & Main Rural Centres) since they are protected by avoidance. There is a risk of cumulative minor negative effects for the settlements (Stratford-upon-Avon and MRCs) in Scenario C, the sites <30 in Scenario D, and those in Scenario G due to the quantum of development. Mitigation measures may be possible through site-specific requirements and careful selection of sites to minimise cumulative effects.
- 5.57 It is assumed that land safeguarded for minerals could be avoided or minimised for all sites and thus for all scenarios indicating neutral effects. Minor negative effects are indicated for Scenarios A and B as there could be cumulative effects for loss of best and most versatile land for agriculture (BVML). For Scenario C, excluding the two Large Rural Sites would lose the opportunity to develop previously used land (Former Harbury Cement Works and Blue Lias Works) with likely minor negative effects. Otherwise, likely neutral effects as the Core Strategy seeks to minimise loss of BMVL with further guidance in the Area Strategies (SA.1-AS.11).

#### Biodiversity, Geodiversity & Green Infrastructure

- 5.58 In the Do Nothing Scenario A, there would be no positive planning that seeks to minimise adverse effects and maximise beneficial effects. There is the potential for reserve sites to accumulate in certain areas where it could be difficult to manage incremental cumulative adverse effects on biodiversity or geodiversity. There is the risk that the wider benefits for inter-related socioeconomics and environmental factors from biodiversity and ecosystems, including resilience to flood risk and climate change and human health/well-being, are not appreciated as much as possible. However, the revised NPPF (201941) is stronger than the previous NPPF with regard to requirements and para 170 (d) requires plans to minimise impacts on biodiversity and to provide net gains. In general, currently, brownfield land may be rich in biodiversity whilst greenfield land may be limited in biodiversity.
- 5.59 The new commitment from national planning policy that all new development should provide net gains indicates that all scenarios could have likely positive effects. It is assumed that all proposed development will comply with CS.7 and contribute green infrastructure (GI) appropriate to its size and

<sup>41</sup> https://www.gov.uk/government/publications/national-planning-policy-framework--2

location – indicating at least minor positive effects. Mitigation measures for biodiversity and to better ensure net gain could be to identify those settlements or areas where biodiversity and GI could be particularly promoted and delivered in line with the priorities in the sub-regional GI Strategy.

#### Flooding & Water Quality

5.60 All scenarios are likely to have neutral effects for flooding and water quality due to strong national and Core Strategy policy requirements.

## Options for Releasing Reserve Housing Sites – Scenarios 1-5

- 5.61 The SAs of Scenarios A-H indicated both positive and negative effects particularly for key factors such as heritage, landscape, traffic/climate change and associated air quality, rural communities and affordable housing. It was not possible to identify any one scenario that might best promote sustainable development and progress the objectives in the Core Strategy and the key aims for the SAP. It was considered that there was no reason to investigate the Do Nothing Scenario any further.
- 5.62 Therefore, a second stage of scenarios was investigated and included the findings from the SAs of the Amber sites arising from the SHLAA (please note that there were no green sites found and red sites were not taken forward). In this way, some enhanced spatial specificity could be explored, and the SA of these scenarios considered the possible cumulative effects for settlements and the District as a whole. Scenario C was sub-divided into 2a-d in order to explore the effects of excluding different categories of Local Service Villages. Scenario D and E were investigated further as Scenarios 3a & 3b. Scenario F and Scenario G were further tested as Scenarios 4 and 5.
- 5.62 The detailed findings of the SA of Scenarios 1-5 is presented in Appendix VIIb of this SA Report. A summary of the SA findings is set out in Table 5.8, as follows:

Table 5.8: Scenarios 1-5 for the Strategy to Identify Reserve Housing Sites - Strategic Sustainability Appraisal (SA) Summary

SA Objectives/ Scenario & Housing Capacity (subject to density)	1 Heritage	2 Landscape	3 Biodiversity & Geodiversity	4 Flooding	5 Climate Change - Traffic	6 Green Infrastructure	7 Minerals Agriculture		8 Air Quality		9 Waste	10 Accessibility & Transport	11 Rural Communifies	12 Settlement Identity	13A Housing Overall	13B Affordable Housing	14 Community & Health	15 Economy & Employment
1: All SHLAA Amber Sites (5,113 dwellings)	-?	?	+?	0	-?	+?	-?	-?	-?	0	0	+?	-?	+	++	++	+	+
<b>2a: Exclude LSVs 4</b> (4,485)	-?	?	+	0	0	+?	-	-	-?	0	0	+?	-?	+	++	++	+	+
2b: Exclude LSVs 3 & 4 (4,339)	0?	-	+	0	0	+	-?	-?	0	0	0	+?	-	+	++	++	+	+
2c: Exclude LSVs 2, 3 & 4 (3,805)	+	-	+	0	0	+	-?	+	0	0	0	+	?	+	++	++	+	+
2d: Exclude Sites in LSVs & LRSs (2,859)	+	+ -	+	0	+	+	0	+	+	0	0	+		+	++	+	+	+
3a: Exclude Sites with Capacity <30 dwellings (3,659)	0	-	+?	0	-	+	0?	0?	- -?	0	0	+	-	+	++	++	+	+
3b: Exclude Sites with Capacity <100 dwellings (2,285)	0?	0?	++?	0	0	++?	0	+	0	0	0	+	-?	+	++	+	+	+
4: Exclude Sites in made/ referendum NDPs (2,421)	+	0	+	0	0 ?	+	0	+	0	0	0	+	+?	+	++	+	+	+
5: Exclude Sites in LSVs exceeded CS.16 (3,396)	0	-	+?	0	-?	+?	-	+?	-?	0	0	+	+?	+	++	++	+	+

- 5.63 By knowing the Amber sites that would be included in each of the scenarios, and by referring to the SA findings of these individual sites, it was possible to refine the SA findings from Scenarios A-H. Positive effects were confirmed for many SA factors biodiversity/geodiversity, green infrastructure, accessibility & transport, settlement identity, housing, community & health, and economy & employment. Negligible or neutral effects were confirmed for flooding, water quality and waste objectives.
- 5.64 The spatial specificity provided through the location of the Amber sites, enabled a refinement of some of the negative effects that had been found for Scenarios A-H. There was still some uncertainty as the effectiveness of possible mitigation measures is not known at this stage of assessment.
- 5.65 Scenario 1 that includes all the Amber sites was found to have negative effects for heritage, landscape, traffic/climate change, minerals/agriculture, air quality, and for rural communities. This was due to the proportion of Amber sites with such negative effects and the scenario that considered a higher quantum of proposed development at 5,113 dwellings than was needed around 2,920 dwellings.
- 5.66 Similar negative effects were found for Scenario 2a that only excluded sites in Category 4 Local Service Villages (LSVs) and with 4,485 dwellings is still in excess of the new development needed. By excluding Category 3 LSVs as well as LSV4 in Scenario 2b, negative effects were reduced for heritage, traffic/climate change, and air quality. This is due to the reduction in the included sites with negative effects for heritage, and a less dispersed approach that reduced the number of sites in the rural areas with a consequential reduction in traffic use in the rural areas.
- 5.67 By further excluding LSV1s as well as LSV2-LSV4, the quantum of development is reduced overall and for the rural areas, thus reducing the minor negative effects on landscape to a minor positive for the rural areas by avoidance. The quantum of development is lower at 2,859 dwellings indicating that the overall effects are reduced. However, by focusing the new development in Stratford-upon-Avon and the Main Rural Centres (MRCs), there was some concern for cumulative negative effects for landscape/townscape at these settlements.
- 5.68 Excluding all the sites in the LSVs in Scenario 2d and most in Scenario 2c, increases the negative effects for the rural communities to major since there is no or limited new development proposed and this does nothing to reduce barriers for rural living.
- 5.69 Excluding sites with capacity <30 dwellings represent a dispersed strategy that would not encourage people to not use private vehicles and would be difficult to promote more sustainable transport. Therefore, Scenario 3a continues with likely negative effects for SA objectives on traffic/climate change, air quality and landscape. Excluding sites with capacity <100 dwellings reduces the number of sites in the rural areas with overall quantum down to 2,285 dwellings which is less than needed. Therefore, most negative

- effects may be reduced to negligible or neutral through the reduced quantum. However, this reduced quantum in itself and the exclusion of the smaller sites (where perhaps they are most needed) indicates minor negative effects for rural communities for both Scenario 3a & 3b.
- 5.70 A mix of positive and negative effects were still found for Scenario 5 that excludes sites in those LSVs that have already exceeded the proportionate amount of development as set out in accordance with Policy CS.16. The high quantum of proposed development at 3,396 in excess of around 2,920 dwellings that are needed indicates that there could still be minor negative effects overall for landscape, traffic/climate change, air quality and minerals.
- 5.71 The refinement of the scenarios to include the SA findings from assessment of the Amber sites, enabled a further refinement with regard to affordable housing which has been identified as a key issue for the SAP. The SA found that overall, Scenarios 2d, 3b and 4 would reduce the positive effects from potential major to minor positive.
- 5.72 The Council considered the evidence, including the SA, the representations to consultations, and discussions with Council Members and it became clear that individually none of the Scenarios would progress the objectives for the Core Strategy and the Site Allocations Plan, in particular for reducing barriers to rural living and providing affordable housing, promoting more sustainable transport and reducing contribution to climate change, whilst ensuring the protection of the important landscapes and townscapes in the District area.
- 5.73 The Council is proposing an approach that takes in part Scenarios 2, 3, 4 & 5, seeking to maximise the positive effects and minimise the negative effects through a careful selection of the Amber sites that meets both urban and rural identified housing needs. Sites are apportioned according to the settlement hierarchy and applying the basis of distribution of development established in Policy CS.15 of the Core Strategy. The outline reasons for such progression or rejection are shown in Table 5.9, as follows:

Table 5.9: Scenarios 1-5 and H – Outline Reasons for Progression or Rejection

Scenario (dwellings)	Outline Progression or Rejection
1: All SHLAA Amber Sites (5,113)	Not progressed due to major negative effects on landscape & townscape throughout the District; minor negative effects on heritage, traffic/climate change, & air quality. Also, concerns that high quantum of development would have negative effects for the rural communities.
<b>2a: Exclude LSVs 4</b> (4,485)	Not progressed alone due to major negative effects on landscape & townscape in the rest of the District; minor negative effects on heritage, traffic/climate change, & air quality. Also, concerns that high quantum of development would have negative effects for the rural communities.

	[
2b: Exclude LSVs 3	Not progressed alone due to major negative effects on landscape & townscape in the rest of the District; minor
(4,339)	negative effects on heritage, traffic/climate change, &
(4,557)	air quality. Also, concerns that high quantum of
	development would have negative effects for the rural
	communities.
2c: Exclude LSVs	Not progressed alone due to major negative effects on
2, 3 & 4	landscape & townscape in the rest of the District; minor
(3,805)	negative effects on heritage, traffic/climate change, &
	air quality. Also, concerns that this scenario would do
	nothing to reduce barriers to rural living & would not
	address the key issues for providing affordable housing in
	the rural areas where it is most needed.
2d: Exclude Sites	Not progressed alone due to major negative effects for
in LSVs & LRSs	the rural communities as there is no new development
(2,859)	proposed & this scenario would do nothing to reduce
	barriers to rural living & would not address the key issues
	for providing affordable housing in the rural areas where
3a: Exclude Sites	it is most needed.
<30	Not progressed alone due to concerns about the dispersed nature of the approach that would encourage
(3,659)	more movement by private vehicles with consequential
(3,037)	negative effects for transport and air quality. Also,
	concerns about negative effects on the important
	landscape for such a dispersed approach through the
	rural areas.
3b: Exclude Sites	Not progressed alone as quantum would not meet with
<100	identified local need. Excluding smaller sites <100
(2,285)	dwellings could limit sites in the rural areas where
	affordable housing is most needed.
4: Exclude Sites in	Progressed as the principle of local housing
made/referendum	development needs has been discussed and tested
NDPs	during the preparation of the NDPs. No significant
(2,421) 5: Exclude Sites in	negative effects identified for the rest of the District.  Not progressed as those settlements that have already
LSVs exceeded	significantly exceeded housing numbers as set out in
CS.16	Policy CS.16 have already benefitted from new
(3,396)	development & it may be assumed that no further new
	development is required. Also, concerns about any
	cumulative effects on environmental factors that might
	arise for these settlements.
H: Sites	Progressed with a focus on those Amber sites that can
apportioned by %	most sustainably deliver reserve housing sites to meet
in Core Strategy	with the 4 purposes as set out in Policy CS.16.
(2,920)	

5.74 Thus, the Council developed a preferred approach to identifying reserve housing sites that lists the most suitable Amber sites to meet with the 4 purposes as set out in Policy CS.16 and to ensure a reasonable number are available to meet with each of the them. This proposed approach progresses

Scenarios 2-5 in part by selecting the most sustainable Amber sites in each of these scenarios that are then aligned with the approach in Scenario H - apportioning sites in accordance with the % for housing in each settlement category as set out in the Core Strategy Policy CS.15. In this way, the Council has allowed for positive effects to be delivered for all categories of settlement and the rural areas, whilst reducing negative effects by spreading the new development across the scenarios.

- 5.75 Scenario 4 has been progressed and the Council has not included any Amber sites within made/at referendum Neighbourhood Plan areas. The principle of new development has been investigated and tested through independent examination by a Planning Inspector. The made NDPs are part of the Stratford-on-Avon Local Plan. For clarity, and to ensure a consistent approach to the release of NDP identified reserve sites, the SAP lists those sites in five NDPs that will be released in accordance with the mechanisms set out in the SAP.
- 5.76 The release of reserve housing sites will be managed in tranches according to the distribution of new development set out in Policy CS.15. Scenario 5 is only progressed at the end of the list of settlements ie after category 4 LSVs indicating that it is not a preferred approach since such LSVs have already accommodated new development that has exceeded the amount as set out in Policy CS.16.

### Developing the Approach to Self-Build & Custom Housebuilding

5.77 In 2020, it was decided that the approach to identifying self-build & custom housebuilding should be investigated through SA in the same way as reserve housing sites were investigated through SA of Scenarios 1-5. Appendix X details the findings of the SA od Scenarios SB1-SB5 and the summary SA findings are presented in Table 5.10, as follows:

Table 5.10: Scenarios SB1-SB5 – SA Summary

SA Objective	All amber Sites	All Amber Sites; exclude Amber sites in Category 4 LSVs	All amber Sites; exclude Amber sites in Category 3 & 4 LSVs	All amber Sites; exclude Amber sites in Category 2, 3 & 4 LSVs	er Sites; Category 1, 's & LRSs	lude Amb h capacity ellings	Exclude Amber Sites with capacity <100 dwellings	All Amber Sites exclude those in made NDPs & to referendum	Exclude Amber sites in LSVs that have exceeded CS.15
	SB1	SB2a	SB2b	SB2c	SB2d	SB3a	SB3b	SB4	SB5
1. Heritage	0	0	0	0	0	0	0	0	O

2. Landscape	0	0	0	0	0	0	0	0	0
3. Biodiversity & Geodiversity	+	+	+	+	+	+	+	+	+
4. Flooding	0	0	0	0	0	0	0	0	0
5. C Change: Access & Traffic	0ŝ	0	0	0	0	0	0	0	0
6. C Change: GI	+ș	+ŝ							
7. Natural Resources	0	0	0	0	0	0	0	0	0
8. Pollution (Air & Water Quality)	0	0	0	0	0	0	0	0	0
9. Waste	0	0	0	0	0	0	0	0	0
10. Transport	0	0	0	0	0	0	0	0	0
11. Rural communities	0	0	0	0	0	0	0	0	0
12. Settlement Identity	0	0	0	0	0	0	0	0	0
13A. Housing – Total	+	+	+	Ś	Ś	ș	ș	+	+
13B. Housing – Affordable	N/A								
14.Communities & Health	+	+	+	+	+	+	+	+	+
15. Economy & Employment	0	0	0	0	0	0	0	0	0

- 5.78 Negligible or neutral and minor positive effects were found for most of the SA objectives essentially due to the small size of these sites, typically around 10 plots. Therefore, the SA findings indicate that generally, the location of such self-build and custom housebuilding is insignificant. However, it is noted that a comparative difference was identified for scenarios 2c, 2d, 3a & 3b with potential major negative effects. With these scenarios, there would be no scope for such small sites that are the most suitable for this type of housing compared to the other scenarios and, therefore, major negative effects with some uncertainty indicated. Excluding all LSVs & the 2 LRSs in Scenario 2d & LSVs 2, 3 & 4 in Scenario 2c would limit opportunities for people to build their own homes in the rural areas with negative effects for the district overall.
- 5.79 It is asserted that it is cheaper to self-build<sup>42</sup> houses & therefore, some positive effects perhaps could be indicated for more affordable housing; however,

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<sup>&</sup>lt;sup>42</sup> For example, please see <a href="https://www.which.co.uk/money/mortgages-and-property/new-build-homes/building-your-own-house-akr431z0pvxm">https://www.which.co.uk/money/mortgages-and-property/new-build-homes/building-your-own-house-akr431z0pvxm</a>

this is not affordable in the sense of meeting the needs of those who cannot yet get onto the housing ladder. Rather, the legislation (Self-Build & Custom Housebuilding Act 2015) provides for an individual or an association of individuals, to build houses to be occupied by those individuals – thus facilitating choice & access to individual house building. Such self-build sites are exempt through national legislation<sup>43</sup> from the requirement to provide a proportion of affordable dwellings and therefore, it is assumed that this SA objective is not applicable N/A to all the scenarios – including for comparative purposes.

https://www.bbc.co.uk/news/magazine-14125196; https://www.self-build.co.uk/build-it-awards-all-the-best-home-winners/

soa276\_August 2020 84/131 Enfusion

<sup>43</sup> https://www.gov.uk/guidance/self-build-and-custom-housebuilding

# 6.0 STRATFORD-ON-AVON SITE ALLOCATIONS PLAN (SAP): Preferred Options

## **Identifying & Releasing Reserve Housing Sites**

- 6.1 The SHLAA process identified Amber sites that are in excess of the number of reserve housing dwellings that are needed. The SA of the Amber sites and the SA of Scenarios 1-5, together with Scenario H, sought to inform the development of an approach to a strategy. The Council has developed an approach that seeks to maximise the positive effects likely from each scenario whilst minimising the potential negative effects.
- 6.2 The preferred strategy for identifying and releasing reserve housing sites comprises Policies SAP.1-5 and two annexes listing sites with their tranches for release according to the four purposes set out in Policy CS.16, as summarised in Table 6.1, as follows:

Table 6.1: Policies SAP.1-5 Reserve Housing Sites

	AP. 1-5 Reserve Housing Sites
SAP Policy	Summary of Policy Text
SAP.1 Identifying Reserve Housing Sites	Approximately 3,130 homes have been identified on sites listed in Annex 1 & on Neighbourhood Plan sites set out in Policy SAP.2. Reserve sites will be released as necessary in accordance with the 4 purposes (a-d) in Core Strategy CS.16. To ensure that a reasonable number of homes on reserve sites are available to meet any one of the 4 purposes, the release of homes for purposes (b) to (d) will be capped – in the first instance to 1,000 homes.
Policy SAP.2 Reserve Sites in Neighbourhood Plans	For clarity & to ensure a consistent approach, the NDP identified reserve sites are as follows: Ettington – South of Banbury Road; Ilmington – North of Back Street; Kineton – East of Lighthorne Road; Kineton – West of Southam Road; Shipston-on-Stour – South of Oldbutt Road; Wellesbourne – East of Warwick Road; & Wellesbourne – East of Mountford Close.
Policy SAP.3 Releasing Reserve Housing Sites	In order to manage the release of reserve housing sites identified in Policies SAP.1 & SAP.2, the Council will apply the basis of distribution of development established in CS.15. Reserve sites will be released in tranches in settlements in the order as follows: SUA, Main Rural Centres, LSV1 & Large Rural Sites, LSV2, LSV3, LSV4, & LSVs that have significantly exceeded indicative numbers set out in CS.16.
Policy SAP.4 Releasing Reserve Housing Sites for Purpose D	The Birmingham shortfall has been confirmed as 1,949 homes across the market area to 2031. Sites will be released with immediate effect to provide a meaningful contribution from Stratford-on-Avon, as follows: STR.A East of Shipston Road, SUA; MAPP.A, MAPP.B & MAPP.C west of Birmingham Road, Mappleborough Green.

Policy SAP.5 Applications for Reserve Housing	Proposals for reserve housing will be brought forward in accordance with Part A Delivery Timescales & Part B Zero
Sites	& Low Carbon Homes
Annex 1	List of Reserve Housing Sites
Annex 2	Settlements & Reserve Sites listed within each tranche A, B, C1, C2 for release

- 6.3 The number of Amber sites considered as potential reserve housing sites are in excess of those needed such that certain Amber sites were progressed, and others not taken forward as preferred sites. Certain Amber sites were not taken forward for specific reasons, as follows:
  - Alcester 1 site (ALC.06) in Green Belt
  - Brailes 1 site (BRA.15) in Cotswolds AONB
  - Henley-in-Arden 2 sites (HEN.06) & HEN.08) in Green Belt
  - Ilmington 3 sites (ILM-09, ILM.10 & ILM11) in Cotswolds AONB
  - Long Compton 2 sites (LC.04 & LC11) in Cotswolds AONB
  - Studley 1 site (STUD.22) in Green Belt
- 6.4 Some Neighbourhood Plans have included reserve housing sites to be released if needs arise. The Council welcomes this expression of localism and has identified 7 sites in 5 Neighbourhood Plans that will be released in accordance with the mechanisms set out in the SAP, as follows:
  - Ettington South of Banbury Road
  - Ilmington Mabel's Farm, Back Street
  - Kineton East of Lighthorne Road; West of Southam Road
  - Shipston-on-Stour South of Oldbutt Road
  - Wellesbourne East of Warwick Road; East of Kineton Road

The Council takes the view that all these sites make a contribution to the overall scale of housing that needs to be available on reserve sites. Furthermore, because these made NDPs form part of the Development Plan for the District and have themselves identified reserve sites, the District Council is of the opinion that it would be unreasonable to identify additional reserve sites in these settlements, even though there are other sites identified as Amber in the SHLAA.

- 6.5 For some settlements, no Amber sites were progressed into the preferred list of reserve housing sites for a range of reasons. Settlements covered by the SHLAA for which no Amber sites were progressed as reserve sites are as follows, for the reasons given:
  - Alderminster 1 site (ALD.05) because it is proposed for self-build development
  - Brailes 1 site (BRA.11) because it is located in the Cotswold AONB

- Ettington 3 sites ((ETT.02, ETT.08B, ETT.11) because the settlement has a made NDP that identifies a reserve site
- Gaydon 3 sites (GAY.03, GAY.06 & GAY.07) due to the scale of housing development that has already been committed in the village
- Hampton Lucy 2 sites (HAMP.03 & HAM.04) for which there are major negative effects to the historic environment (setting of the Conservation Area & Grade II Listed Buildings)
- Henley-in-Arden 2 sites (HEN.06 & HEN.08) because they are located within the Green Belt
- Ilmington 5 sites (ILM.01, ILM03, ILM.09, ILM.10, ILM.11) because the settlement has a made NDP that identifies a reserve site
- Kineton 2 sites (KIN.07, KIN.08) because the settlement has a made NDP that identifies reserve sites
- Lighthorne 1 site (LIG.06) for which there are major negative effects to the historic environment (Grade II Listed church & building; setting of the Conservation Area)
- Long Compton 2 sites (LC.04 & LC.11) because they are located within the Cotswolds AONB
- Long Itchington 6 sites (LONG.01, LONG.04, LONG.07, LONG.14B, LONG.15 & LONG.20) due to the scale of housing development that has already been committed in the village
- Loxley 2 sites (LOX.05 & LOX.09) because they are allocated in a made NDP
- Salford Priors 3 sites (SALF.08, SALF.11, SALF.17) due to the scale of housing development that has already been committed in the village
- Shipston-on-Stour 4 sites (SHIP.01, SHIP.07A, SHIP 08B, SHIP.11) because the settlement has a made NDP that identifies reserve sites
- Wellesbourne 2 sites (WELL.06, WELL.10) because the settlement has a made NDP that identifies reserve sites and 1 site (WELL.07A) because it is proposed for self-build development
- 6.6 Having not progressed certain Amber sites for specific reasons associated with concerns to avoid nationally important landscape (Cotswolds AONB), other high landscape sensitivities, Green Belt, and nationally important historic assets and their settings, the remaining Amber sites still reflected higher numbers of housing than were needed. Therefore, the Council carefully selected sites within the remaining settlements that sought to share the benefits of new development, particularly for delivery of affordable housing in the rural areas, whilst minimising the potential for cumulative negative effects, particularly on landscape and the historic environment. The remaining Amber sites have been identified as suitable, available, and achievable and, on that basis, appropriate to be identified as reserve sites in the Plan. The reasons for rejecting certain Amber Sites are outlined in Table 6.2, as follows:

Table 6.2: Progression of Amber Sites into Policy SAP.1 Annex 1- Outline Reasons

SHLAA	Site Location	Reason(s) for Rejecting Site
Ref		
ALC.06	North of Captains Hill, Alcester	Situated within the Green Belt
ALC.14	North of Allimore Lane, Alcester	Identified as a Self-Build/Custom Build proposal
ALD.05	East of Skylark Road, Alderminster	Identified as a Self-Build/Custom Build proposal
BISH.07	West of Gaydon Road, Bishop's	Scale of housing provision already made in settlement
	Itchington	
BRA.15	South of Orchard Close, Brailes	Situated within Cotswolds Area of Outstanding Natural Beauty
ETT.02	West of Old Warwick Road, Ettington	Made Neighbourhood Development Plan identifies reserve site
ETT.09B	South of Banbury Road (rear), Ettington	Made Neighbourhood Development Plan identifies reserve site
ETT.11	South of Rogers Lane (middle), Ettington	Made Neighbourhood Development Plan identifies reserve site
		Substantial harm to heritage assets
FEN.02	North of Northend Road (east), Fenny	Substantial harm to heritage assets
	Compton	
FEN.04	West of High Street, Fenny Compton	Substantial harm to heritage assets
FEN.09	South of Station Road (east), Fenny	Scale of housing provision already made in settlement
	Compton	
GAY.07	South of Kineton Road, Gaydon	Scale of housing provision already made in settlement
HALF.03	North of Idlicote Road, Halford	Identified as a Self-Build/Custom Build proposal
HALF.08	East of Fosse Way (middle), Halford	Substantial harm to heritage assets
HAMP.03	East of Snitterfield Road, Hampton Lucy	Substantial harm to heritage assets
HAMP.04	South of Church Street, Hampton Lucy	Substantial harm to heritage assets
HAR.06	North of Mill Street (east), Harbury	Appropriate vehicular cannot be achieved
HAR.16	West of Bush Heath Lane (north),	Identified as a Self-Build/Custom Build proposal
	Harbury	
HEN.06	West of Stratford Road (north), Henley-	Situated within the Green Belt
	in-Arden	
HEN.08	West of Bear Lane, Henley-in-Arden	Situated within the Green Belt
ILM.01	South of Armscote Road, Ilmington	Neighbourhood Development Plan at referendum identifies reserve
		site

ILM.03	North of Ballards Lane	Neighbourhood Development Plan at referendum identifies reserve site
ILM.09	North of Back Street (west), Ilmington	Neighbourhood Development Plan at referendum identifies reserve site
		Situated within Cotswolds Area of Outstanding Natural Beauty Substantial harm to heritage assets
ILM.10	North of Back Street (middle), Ilmington	Neighbourhood Development Plan at referendum identifies reserve site
		Situated within Cotswolds Area of Outstanding Natural Beauty
ILM.11	North of Back Street (east), Ilmington	Neighbourhood Development Plan at referendum identifies reserve site
		Situated within Cotswolds Area of Outstanding Natural Beauty
ILM.16	North of Armscote Road (west),	Neighbourhood Development Plan at referendum identifies reserve
	Ilmington	site
KIN.07	North of Banbury Road (west), Kineton	Made Neighbourhood Development Plan identifies reserve sites
KIN.08	North of Banbury Road (east), Kineton	Made Neighbourhood Development Plan identifies reserve site
LIG.06	North of Church Lane, Lighthorne	Substantial harm to heritage assets
LC.04	East of Back Lane, Long Compton	Situated within Cotswolds Area of Outstanding Natural Beauty Substantial harm to heritage assets
LC.11	West of Oxford Street (south), Long Compton	Situated within Cotswolds Area of Outstanding Natural Beauty
LONG.04	North of Collingham Lane (west), Long Itchington	Identified as a Self-Build/Custom Build proposal
LONG.07	South of Stockton Road, Long Itchington	Scale of housing provision already made in settlement
LONG.15	North of Leamington Road (east), Long Itchington	Scale of housing provision already made in settlement
LMAR.08	East of Long Marston Road (middle), Long Marston	Substantial harm to heritage assets
LOX.05	North of Stratford Road (west), Loxley	Allocated in made Neighbourhood Development Plan
LOX.09	North of Goldicote Road (south), Loxley	Allocated in made Neighbourhood Development Plan
NAP.07	North of Dog Lane (west), Napton-on- the-Hill	Identified as a Self-Build/Custom Build proposal

NAP.13	North of Folly Lane (middle), Napton-on- the-Hill	Substantial harm to heritage assets
QUIN.03	North of Main Road (east), Quinton	Substantial harm to heritage assets
QUIN.07	South of Main Road (middle), Quinton	Substantial harm to heritage assets
QUIN.19	South of The Fordway	Scale of housing provision already made in settlement
SALF.08	West of Evesham Road (south), Salford	Scale of housing provision already made in settlement
37 (El .00	Priors	Identified as a Self-Build/Custom Build proposal
SALF.11	South of School Road (middle), Salford Priors	Scale of housing provision already made in settlement
SHIP.01	South of Darlingscote Road, Shipston- on-Stour	Made Neighbourhood Development Plan identifies reserve site
SHIP.07A	East of Stratford Road (south), Shipston- on-Stour	Made Neighbourhood Development Plan identifies reserve site
SHIP.08B	South of Oldbutt Road (rear), Shipston- on-Stour	Made Neighbourhood Development Plan identifies reserve site
SHIP.11	West of Shoulderway Lane, Shipston-on- Stour	Made Neighbourhood Development Plan identifies reserve site
STOC.10	West of Jubilee Fields, Stockton	Identified as a Self-Build/Custom Build proposal
STOC.12	West of Sycamore Close, Stockton	Scale of housing provision already made in settlement
STR.11	East of Banbury Road, Stratford-upon- Avon	Lack of capacity on highway network on south side of town
STR.12	West of Banbury Road, Stratford-upon- Avon	Lack of capacity on highway network on south side of town
STUD.07	East of Redditch Road (south), Studley	Noise impact from adjacent industrial uses
STUD.22	East of Green Lane, Studley	Situated within the Green Belt
TYS.12	South of Oxhill Road, Tysoe	Substantial harm to heritage assets
TYS.17	West of Church Farm Court, Tysoe	Substantial harm to heritage assets
WELF.04	North of Millers Close (west), Welford-on- Avon	Identified as a Self-Build/Custom Build proposal
WELF.10	East of Hunt Hall Lane (south), Welfordon-Avon	Scale of housing provision already made in settlement
WELL.06	West of Kineton Road, Wellesbourne	Made Neighbourhood Development Plan identifies reserve sites

WELL.07A	North of Walton Road, Wellesbourne	Made Neighbourhood Development Plan identifies reserve sites
		Identified as a Self-Build/Custom Build proposal
WELL.10	South of Loxley Road, Wellesbourne	Made Neighbourhood Development Plan identifies reserve sites
LSL.06A	Former Long Marston Depot	Identified as a proposed allocation

6.7 The preferred approach to a strategy for identifying and releasing reserve housing sites as set out in Policies SAP.1-5 was subject to SA using the same SA Framework and method in a comparable manner to the SA of the Scenarios. The detailed findings of the SA are provided in Appendix XI of this SA Report and the summary findings are presented in Table 6.3, as follows:

Table 6.3: Preferred Strategy to Identify & Release Reserve Housing Sites – SA Summary

		- 37	<u>,</u>	A Release Reserve Hoosing Siles - SA Sommary														
SA Objectives/ SAP Policies SAP.1-SAP.5	1 Heritage	2 Landscape	3 Biodiversity & Geodiversity	4 Flooding	5 Climate Change	6 Green Infrastructure	7 Minerals		8 Air Quality	Water Quality	9 Waste	10 Accessibility & Transport	11 Rural Communifies	12 Settlement Identity	13A Housing Overall	13B Affordable Housing	14 Community & Health	15 Economy & Employment <sup>44</sup>
SAP.1 Identifying Reserve Housing Sites	-?	?	+	0	0	+	0	+	0	0	0	+	+	+	++	++	+	+
SAP.2 Reserve Sites in Neighbourhood Plans	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0
SAP.3 Releasing Reserve Housing Sites	-?	?	+	0	0	+	0	+	0	0	0	+	+	+	++	++	+	+
SAP.4 Releasing Reserve Housing Sites for Purpose 4	0	?	+	0	-?	+	0	+	0	0	0	-?	0		++	++	+	+
SAP.5 Applications for Reserve Housing Sites	0	0	0	0	+	0	0	0	0	0	0	0	+	0	++	++	+	+

soa276\_August 2020 93/131 Enfusion

<sup>&</sup>lt;sup>44</sup> Please note that whilst the preferred strategy is for reserve housing sites, it is acknowledged that provision of good quality housing will support the local economies & employment such that these indirect & direct effects are recorded here

- 6.8 The Council has carefully selected sites dispersed in settlements throughout the District area aiming to share the benefits of new development, particularly for delivery of affordable housing and in the rural areas, whilst minimising the potential for cumulative negative effects, particularly on landscape, the historic environment, and vehicle emissions/air quality and climate change. Therefore, at this stage of plan development, it is to be expected that positive effects have been optimised, and negative effects have been minimised. Mitigation measures have been implemented by reducing the scale of development on certain sites. This is particularly the case with landscape impact as the Landscape Sensitivity Assessments that informed the SHLAA identified a substantial number of land parcels as having high or high/medium sensitivity. Avoiding all such sites would have meant that the dwelling requirement on reserve sites would not have been met. Some uncertainty of significance and possibilities for site-specific mitigation measures remain for some sites. The selection of suitable reserve housing sites has to consider the likely effects of the site itself, the cumulative and interrelated effects of any one site with other sites in a settlement, and the implications for any cumulative effect on the District area as a whole.
- 6.9 Overall, the SA of the preferred strategy with **Policies SAP.1-5** found neutral effects for SA objective No 4 Flooding, No 7 Minerals, No 8 Air Quality & Water Quality, and No 9 Waste. This is due to careful selection of sites with strong policy and regulatory frameworks at national and county levels, together with the policies in the core Strategy. Core Strategy Policy CS.4 Water Environment & Flood Risk provide strong mitigation to ensure that there will be no significant adverse effects. All new development must deliver a net gain in biodiversity in line with national planning policy requirements.
- 6.10 Negative effects were indicated as some sites are located within a minerals safeguarding area (MSA). It is not known whether there would be any significant effects at this stage, so some uncertainty. None of the sites is affected by an allocation for mineral extraction in Warwickshire County Council's Minerals Plan. It is assumed that development would be restricted on any sites shown to be viable for mineral extraction, so mitigation measures in place and overall, SA findings amended to neutral with some uncertainty.
- 6.11 The new draft Minerals Plan<sup>45</sup> (November 2019) that was submitted for independent examination includes Policy MCS5 that defines the Mineral Safeguarding Areas to ensure that Warwickshire's sand and gravel, crushed rock, brick-making clay resources, cement raw materials and building stone will be safeguarded against needless sterilisation by non-minerals development, unless "prior extraction". Policy DM10 advises that non-mineral development must demonstrate that it will not sterilise mineral resources or prejudice the use of existing or future mineral sites or infrastructure. Therefore, overall, for the preferred strategy, effects will be neutral since policy mitigation measures would have be applied in order to comply with the Core Strategy and the Minerals Local Plan.

soa276\_August 2020 94/131 Enfusion

<sup>45</sup> https://warwickshire-consult.objective.co.uk/portal/warwickshire\_minerals\_plan\_submission

- 6.12 The district has very good air quality, however there are issues in Studley and Stratford-upon-Avon. Both have AQMA zones due to levels of NO<sub>2</sub> exceeding the annual mean. Transport is the highest emitting sector for air pollution in the district. Core Strategy Policy AS.1 requires new development to apply measures relating to the AQMA for the town. Amber sites in Studley were not progressed into the preferred strategy due to concern about the effects on traffic and air quality. Only 2 sites of the 4 Amber sites in Stratford-upon-Avon and 1 site in nearby Tiddington were progressed due to concerns about traffic and air quality. The SA suggested that site-specific requirements could be included for these 3 sites to encourage use of more sustainable transport modes through the new development. Overall, neutral effects identified for the District.
- 6.13 Core Strategy Policy CS.4 Environment and Flood Risk encourages sustainable drainage systems to also improve WQ, not affect ability to water to meet objectives in the Severn RBMP, and development must avoid pollution to water. Thus, mitigation measures through CS policy will ensure that new development will not result in any negative effects on WQ. The proposed sites in this strategy are dispersed through the area of the district such that cumulative effects on WWTW capacities are unlikely. Sites were identified in settlements that are within a water safeguarding zone Bishops Itchington, Fenny Compton, Harbury, Napton, Southam, and Stockton representing about 20% of all the sites. It is considered that mitigation measures will be able to be implemented through design and pollution control measures resulting in likely neutral effects for all sites. Therefore, overall, neutral effects are indicated for the District.
- 6.14 All sites have the potential for neutral effects with regards to objectives for waste through development management policies in the Core Strategy and the Warwickshire Waste Local Plan.
- 6.15 The Council has taken the approach of not identifying reserve housing sites in those settlements with a reserve site identified in its Neighbourhood Development Plan (NDP) for those with a made NDP or close to examination/referendum. This is because the principle of development has been discussed and agreed for these NDPs. **Policy SAP.2** sets out how 7 selected sites in 5 NDPs will be released in accordance with the mechanisms set out in the SAP in order to provide clarity and to ensure a consistent approach. The explanatory text to the Policy SAP.2 details the reasoning and explains the relationships between the Local Plan documents and the NDPs, including the different methods of plan development.
- 6.16 As these NDP sites have already been identified as possible reserve housing sites, they are not included within the list of Amber sites, and the SA considered effects to be neutral as the principle of such development has already been established. The Policy is providing clarity and consistency it is not proposing additional sites. Therefore, Policy SAP.2 was found to be neutral for most SA objectives as the assessment is not applicable. However, minor positive effects were recorded for biodiversity and green infrastructure to acknowledge the recent national planning requirements for biodiversity net gain from all new development.

- 6.17 **Policy SAP.5** sets out the delivery timescale requirements for reserve housing proposals and the supporting text explains that the fundamental purpose of a reserve site is to meet an identified housing need that is not being met elsewhere and as such, houses should be built expeditiously. The SA found that this would have positive effects for objectives on housing, communities, health, and local economies through ensuring that proposed houses are built where needed in a timely manner.
- 6.18 This Policy SAP.5 ensures that houses will be built where and when needed and this includes consideration of the rural areas, indicating minor positive effects for reducing barriers to rural living that may be synergistic and cumulative in the longer term.
- 6.19 Policy SAP.5 also acknowledges the increasing concerns for addressing climate change. The Policy strongly supports proposals for zero carbon development on reserve housing sites and this will promote positive effects for SA No 5 Climate Change.
- 6.20 **Policy SAP.4** Releasing Reserve Housing Sites for Purpose D relates to the provision of 4 sites as the Council's meaningful contribution to remedying the shortfall to 2031 for the Birmingham housing market area. The 4 sites comprise 1 site in Stratford-upon-Avon and 3 sites at Mappleborough Green. The SA found positive effects for objectives on housing, health, communities, and local economies. Also, positive effects as there is no landtake of any best and most versatile agricultural land.
- 6.21 However, negative effects were indicated for objectives on traffic/climate change, location with minerals safeguarded area, and accessibility/transport. The sites at Mappleborough Green are not supported by the County Highway Authority with regard to provision of additional access points from the A435 at Mappleborough Green. However, as the sites abut other potential development sites within Redditch boundaries, there may be scope for a comprehensive traffic scheme with suitable access from Far Moor Lane. Minor negative effects at this stage with uncertainty for the potential implementation of a strategic mitigation scheme.
- 6.22 The 3 sites were also found to have minor negative effects for objectives on accessibility as they are not within walking distance of local services/facilities; however, they are within 400m of a bus-stop. As the sites are near to other proposed development sites, it may be possible to identify some strategic approach that would increase opportunities for sustainable transport and to access any existing or new local services/facilities. Major negative effects were identified for protection of countryside integrity as they do not follow the extant settlement boundary and may adversely affect identity with neighbouring settlements. As the sites are near to other proposed development sites, it may be possible to identify some strategic approach that would help to mitigate the negative effects that are indicated.
- 6.23 **Policy SAP.1** Identifying Reserve Housing Sites and **SAP.3** Releasing Reserve Housing Sites are closely linked with regard to the SA findings. Positive effects are confirmed for SA objectives on biodiversity/green infrastructure (due to

national requirements for all development to deliver biodiversity gain), use of land/soil quality by avoiding best & most versatile agricultural land, accessibility/sustainable transport, rural communities, settlement identity, housing, communities & health, and support for the local economies. Major positive effects were found for housing – both total and affordable – including within the rural areas – thus confirming that the SAP has sought to address the particular issue identified for delivery of affordable housing in the rural areas.

- 6.24 Negative effects remain for SA objectives on the historic environment and landscape/townscape – such effects are uncertain at this stage as it is not clear how site-specific mitigation measures may be possible and deliverable. Core Strategy Policy CS.8 Historic Environment seeks to protect and enhance heritage assets and their settings. Guidance is further provided through the Area Strategies (AS.1-AS.11) and supported by design guidance. Policy SAP.1 ensures that a reasonable number of homes on reserve sites will be available to meet any one of the 4 purposes to 2031 – with a cap at 1,000 homes for purposes (b) to (d). This approach will ensure that release of sites for homes is dispersed throughout the District's area and thus, tending to avoid potential cumulative negative effects for individual settlements or overall, for the district. However, the SA found that particular consideration may need to be given to those settlements that include a majority of sites with likely negative effects for the historic environment – Alcester, Clifford Chambers, Fenny Compton, Harbury, Priors Marston, Southam, Stockton, Tysoe and Wellesbourne.
- 6.25 The reserve sites listed in Policy SAP.1 Annex 1 were all found to have likely negative effects due to the high-medium sensitivities of the local landscape/townscape to housing development around 40% of the sites were found to be minor negative and some 60% of the sites found to have potential major negative effects. There was much uncertainty to the assessment as it was unclear at this stage to what extent mitigation measures would be effective.
- 6.26 Core Strategy Policy CS.5 seeks to maintain the character and quality of landscape and includes a requirement to consider the cumulative impacts of development proposals. The policy approach with capping will ensure that release of sites for homes is dispersed throughout the District's area and thus, seeks to avoid potential cumulative negative effects overall. By limiting the number of sites in any one settlement, the Policy has embedded mitigation measures through reducing the likely cumulative effects for each settlement. It is assumed that mitigation measures can be implemented through good quality design and provision of appropriate green infrastructure - thus reducing the overall effects to minor negative for settlements and the District area as a whole. The SA found that particular attention will need to be applied to those settlements where all or the majority of the sites were found by initial SA to have major negative effects - Clifford Chambers, Fenny Compton, Harbury, Mappleborough Green, Morton Morrell, Priors Marston, Quinton, Stockton, and Stratford-upon-Avon.
- 6.27 **Policies SAP.1-SAP.5**: Overall, the SA found the preferred strategy to identifying and releasing reserve housing sites to have likely positive effects on

objectives for on biodiversity/green infrastructure, use of land/soil quality by avoiding best & most versatile agricultural land, accessibility/sustainable transport, rural communities, settlement identity, housing, communities and health, and support for the local economies. Major positive effects were found for housing – both total and affordable – and including within the rural areas – thus confirming that the SAP has sought to address the particular issue identified for delivery of affordable housing in the rural areas.

- 6.28 The approach that lists sites in Annex 1 according to settlement category ensures that sites are available throughout the District according to need with positive effects; and the approach in Annex 2 according to tranches for each of the 4 purposes of reserve housing sites ensures that sites are available over the whole timescale to 2031 with positive effects for delivery of such housing through the short to medium timescales.
- 6.29 Effects on SA objectives for flooding, traffic/climate change, minerals, air quality, water quality, and waste were found to be negligible or neutral. Minor negative effects were found for the historic environment but with uncertainty since at this stage the possibilities for site-specific mitigation measures are not known. Major negative effects were indicated for landscape/townscape for some 60% of the individual sites in Annex 1 and with concern for cumulative effects for certain settlements where the majority of the sites indicated major negative effects.
- 6.30 **SA Suggestions**: the SA of the preferred strategy comprising Policies SAP.1-SAP.5 made a number of suggestions for mitigation measures that could reduce the negative effects particularly in respect of those for the historic environment and the landscape/townscape and visual effects, as follows:
  - Historic Environment: Site-specific requirements to mitigate for identified minor negative effects. Particular consideration may need to be given to those settlements that include a majority of sites with likely negative effects for the historic environment – Alcester, Clifford Chambers, Fenny Compton, Harbury, Priors Marston, Southam, Stockton, Tysoe and Wellesbourne.
  - Landscape: Site-specific requirements to mitigate for negative effects in consideration of major negative effects in areas of high landscape sensitivity. It is assumed that mitigation measures can be implemented through good quality design and provision of appropriate green infrastructure thus reducing the overall effects to minor negative for settlements and the District area as a whole. Particular attention will need to be applied to those settlements where all or the majority of the sites were found by initial SA to have major negative effects Clifford Chambers, Fenny Compton, Harbury, Mappleborough Green, Moreton Morrell, Priors Marston, Quinton, Stockton, Stratford-upon-Avon, and Wellesbourne.
  - Biodiversity & Green Infrastructure: Positive effects could be enhanced by identifying those settlements or areas where biodiversity & GI could be particularly promoted and delivered in line with the priorities in the

- sub-regional GI Strategy<sup>46</sup>, including opportunities for positive synergistic and cumulative effects, for example, providing links between green spaces and sustainable transport routes.
- **Flooding**: Site-specific requirements for ALC.12, ALC.13, BISH.01, CLIF.02, CLIF.04, and SOU.14 should ensure that residual effects are negligible.
- Traffic: Some 6 settlements included more than 50% of Amber sites with potential access issues – Alcester, Bidford-on-Avon, Mappleborough Green, Oxhill, Southam, and Stratford-upon-Avon and particular attention may be needed to minimise cumulative effects of new development.
- Minerals: It is assumed that development would be restricted on any sites shown to be viable for mineral extraction, so mitigation measures are in place, but site-specific requirements may be needed to make this explicit.
- Air Quality: Site-specific requirements should provide mitigation measures to reduce effects, especially in Stratford-upon-Avon where sustainable transport may be better encouraged.
- Access: For the 3 sites at Mappleborough Green, as the sites are near to other proposed development sites, it may be possible to identify some strategic approach that would increase opportunities for sustainable transport - and to access any existing or new local services/facilities.
- Settlement Identity: The 3 sites in Mappleborough Green were found to have major negative effects since they do not follow the extant settlement boundary and may adversely affect identity with neighbouring settlements. As the sites are near to other proposed development sites, it may be possible to identify some strategic approach that would help to mitigate the negative effects that are indicated.
- 6.31 The summary findings of the SA of the Amber sites selected within the preferred scenario approach and as listed in the Schedule of Proposed Reserve Housing Sites Annex 1, are as follows in Table 6.4:

soa276\_August 2020 99/131 Enfusion

<sup>46</sup> https://apps.warwickshire.gov.uk/api/documents/WCCC-863-513

Table 6.4: Annex 1 Proposed Reserve Housing Sites – SA Summary

Table 6.4: Annex 1 Proposed I	<u>keserve</u>	HOUSII	ng sites	<u> - 24 2</u>	ummai	У									
+							SA	Objecti	ves						
	1	2	3	4	5	6	747	848	9	10	11	12	13	14	15
	Heritage	Landscape	Biodiversity& Geodiversity	Hooding	Climate Change: Accessibility & traffic	Climate Change: Green Infrastructure	Natural resources (Minerals & Agricultural Land)	Pollution (Air Quality & Water Quality)	Waste	Transport	Reduce barriers for rural communities	Protect the settlements identity	Housing A Total & B Affordable	Communities & Health	Economy & Employment
				Larg	e Stand	alone R	ural Site	es .							
LMD.A (LSL.04B) Land at Former Harbury Cement works (210 dwellings)	0	-	+	-		+	0 +	0 0	0	+	N/A	+	++	++	0
LMD.B (LSL.06B) Land Adjacent Former Long Marston Depot (90 dwellings)	0	-	+	0	-	+	0 -	0 0	0	+	N/A	+	++	++	0
		Proj	posed A	mber S	ites for I	Reserve	Housing	g by Set	tlement						
					Al	cester									
ALC.A (ALC.12) South of Allimore Lane (West) (60 dwellings)	0	-Ś	+	-	0	+	0 +	0 0	0	+	N/A	+	++	+	0

<sup>&</sup>lt;sup>47</sup> Please note that first symbol refers to Minerals & second symbol refers to Agricultural Land

<sup>&</sup>lt;sup>48</sup> Please note that first symbol refers to Air Quality & second symbol refers to Water Quality

ALC.B (ALC.13) South of Allimore Lane (East) (120	-Ś	-Ś	+	-	-	+	0		0	0	0	+	N/A	+	++	+	0
dwellings)																	
	Bidford on Avon																
BID.E (BID.02) West of Grafton Lane (150 dwellings)	0	-Ś	+	0	-	-	s O		0	0	0	-	N/A	+	++	+	0
BID.A (BID.08A) South of Salford Road (middle) (24 dwellings)	-	\$	+	-ŝ	-	+	s 0	-	0	0	0	+	N/A	+	+	+	0
BID.C (BID.09) North of Salford Road (120 dwellings)	0	-ŝ	+	-ș	-ŝ	+	s O	-	0	0	0	-	N/A	+	++	+	0
BID.D (BID.11) East of Victoria Road (120 dwellings)	0	-Ś	+	0	-	+	s O		0	0	0	-	N/A	+	++	+	0
BID.B (BID.13) South of Salford Road (west) (60 dwellings)	0	Ś	+	-Ś	-	+	s O		0	0	0	-	N/A	+	++	+	0
					Bishops	Itching	gton										
BISH.A (BISH.01) North of Ladbroke Road (21 dwellings)	0	\$	+	-ș	0	+	s 0	+	0	-	0	+	N/A	+	+	+	0
BISH.B (BISH.02) North of Hambridge Road (24)	0	ș	+	0	0	+	s O	+	0	-	0	+	N/A	+	+	+	0
					Clifford	Chaml	bers										
CLIF.C (CLIF.01) East of Shipston Road (13 dwellings)	-ŝ	\$	+	-ŝ	-	+	s 0		0	0	0	+	N/A	+	+	+	0
CLIF.D (CLIF.02) East of the Nashes (25 dwellings)	-	Ś	+	-	0	+	s 0	+	0	0	0	+	N/A	+	+	+	0
CLIF.B (CLIF.04) East of Campden Road (south) (10)	0		+	-	0	+	0	+	0	0	0	+	N/A	+	+	+	0
CLIF.A (CLIF.05A) West of Campden Road (north) (5)	-	\$	+	0	0	+	s O		0	0	0	+	N/A	+	+	+	0
					Fenny	Compl	on										
FEN.B (FEN.01) North of Northend Road (west) (15 dwellings)	-ŝ	ŝ	+	0	0	+	0	+	0	-	0	+	N/A	+	+	+	0

FEN.D (FEN.06) North of High	-Š	Š	+	0	0	+	0	+	0	_	0	+	N/A	+	+	+	0
Street (21 dwellings)	•	·		Ŭ									11// (		·	·	
FEN.C (FEN.07) North of Station	-Ś	Ś	+	0	0	+	0	+	0	_	0	-	N/A	+	+	+	0
Road (west) (15 dwellings)													-				
FEN.A (FEN.12) East of	-Ś	ș	+	0	0	+	0	+	0	-	0	+	N/A	+	+	+	0
Ridgeway (6 dwellings)																	
Gaydon																	
GAY.A (GAY.03) East of	0	Ś	+	0	-	+	0	+	0	0	0	+	N/A	+	+	+	0
Banbury Road (south) (24 dwellings)																	
GAY.B (GAY.06) South of	_	Ś	+	0	_	+	0	+	0	0	0	+	N/A	+	+	+	0
Church Lane (west) (15		Ť	·	O		, i		Ė			0		13//		·	·	0
dwellings)																	
GAY.C (GAY.07) South of	0	ș	+	0		+	0	+	0	0	0	+	N/A	+	+	+	0
Kineton Road (30 dwellings)																	
					Н	alford											
HALF.A (HALF.01) East of Fosse	-ș	-ș	+	0	0	+	0	+	0	0	0	-	N/A	+	+	+	0
Way (north) (6 dwellings)																	
					Н	arbury											
HAR.A (HAR.05) North of Mill	-	ș	+	0	0	+	0	+	0	-	0	+	N/A	+	+	+	0
Street (west) (12 dwellings)																	
HAR.B (HAR.20) South of Middle	0	-ș	+	0	-	+	0	+	0	-	0	+	N/A	+	+	+	0
Road (15 dwellings)																	
HAR.C (HAR.O4) North of	-	ș	+	0	0	+	0	+	0	-	0	+	N/A	+	+	+	0
Binswood End (24 dwellings)	0	Ś	+	0	0		0		0	_	0	+	N1/A	+	+	+	0
HAR.D (HAR.13) West of bush Heath Road (36 dwellings)	U	¢	+	U	U		U	+	0	-	O	+	N/A	+	+	+	U
					Long	Itchingto	n										
10110 1 (10110 011 5 1 1	1																
LONG.A (LONG.01) East of	-	-ș	+	0	0	+	0	+	0	-	0	+	N/A	+	+	+	0
Marton Road (north) (18)		0		0							0		N 1 / A				
LONG.B (LONG.14B) North	0	-ŝ	+	0	0	+	0	-	0	-	0	+	N/A	+	+	+	0
of Leamington Road																	
(middle) (18 dwellings)																	

					Long	Marsto	n										
LMAR.A (LMAR.09) East of Long Marston Road (middle) (8)	-	Ś	+	0	0	+	0	+	0	0	0	-	N/A	+	+	+	0
LMAR.B (LMAR.02) East of Rumer Close (18 dwellings)	0	ș	+	0	0	+	0	+	0	0	0	+	N/A	+	+	+	0
LMAR.C (LMAR.17) North of Barley Fields (15 dwellings)	0	-Ŝ	+	0	0	+	0	+	0	0	0	+	N/A	+	+	+	0
				M	appleb	orough	Gre	en									
MAPP.B (MAPP.01A) West of 0? + 0 -? + 0 0 0 0 - N/A + + 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0																	
Birmingham Road (25 dwellings)	0	ș	+	0	-ș	+	s 0	+	0	0	0	-	N/A		+	+	0
MAPP.A (MAPP.01C) West of Birmingham Road (5 dwellings)	0		+	0	-ș	+	s 0	+	0	О	0	-	N/A		+/0	+	0
					Moret	on Mori	ell										
MM.A (MM.03) North of Brook Lane (10 dwellings)	0	ș	+	0	0	+	s 0	-	0	0	0	-	N/A	+	+	+	0
MM.B (MM.04) South of Brook Lane (east) (13 dwellings)	0	ș	+	0	0	+	s O	+	0	0	0	-	N/A	+	+	+	0
MM.C (MM.10) South of John Davis Drive (20 dwellings)	0	-Ś	+	0	0	+		+	0	0	0	-	N/A	+	+	-Ś	0
					Napton	-on-the	-Hill										
NAP.A (NAP.03) East of butt Hill (south) (6 dwellings)	-ș	Ş	+	0	0	+	s 0	+	0	-	0	-	N/A	+	+	+	0
					Newbo	ld-on-S	tour										
NEWB.A (NEWB.01) East of Stratford Road (8 dwellings)	-	Ś	+	0	0	+	0	Ś -	0	0	0	+	N/A	+	+	+	0

NEWB.A (NEW.06) North of Moss Lane (east)	-	-Ś	+	0	0	+	0	Ś -	0	0	0	+	N/A	+	+	+	0
					(	Oxhill											
OXH.B (OXH.06) North of Green Lane (west) 13 dwellings)	0	-Ś	+	0	-	+	0	+	0	0	0		N/A	+	+	+	0
OXH.A (OXH.07) South of Whatcote Road (5 dwellings)	0	ئ	+	0	-	+	0	+	0	0	0		N/A	+	+/0	+	0
					Piller	ton Prio	rs										
PILL.A (PILL.13 East of Kineton Road (13 dwellings)	0	ș	+	0	-	+	0	+	0	0	0	-	N/A	+	+	+	0
Priors Marston																	
PM.B (PM.01) East of Shuckburgh Road (20 dwellings)	-ŝ	\$	+	0	-	+	0	+	0	-	0	-	N/A	+	+	-	0
PM.A (PM.0.7) south of Byfield Road (10 dwellings)	-Ś	ș	+	0	0	+	0	+	0	-	0	+	N/A	+	+	+	0
					Q	uinton											
QUIN.A (QUIN.04) East of Back Lane (north) (12 dwellings)	-	\$	+	0	-	+	0	+	0	0	0	+	N/A	+	+	-	0
QUIN.D (QUIN.08) East of Goose Lane (north) (30 dwellings)	0	-ș	+	0	-	+	0	+	0	0	0	+	N/A	+	+	+	0
QUIN.C (QUIN.18) West of Goose Lane (24 dwellings)	0	-ŝ	+	0	-	+	0	+	0	0	0	+	N/A	+	+	+	0
QUIN.B (QUIN.22) East of Back Lane (south) (15 dwellings)	-Ś	\$ <b>.</b>	+	0	-	+	0	+	0	0	0	+	N/A	+	+	+	0

					Salfo	ord Prior	'S										
SALF.A (SALF.17) North of Bomford Way (24 dwellings)	0	<b>.</b>	+	-	0	+	s 0		0	0	0	+	N/A	+	+	-	0
					So	utham											
SOU.D (SOU.2) East of bypass (240 dwellings)	0	-Ś	+	0	-	+	s 0	+	0	-	0	+	N/A	+	++	+	0
SOU.A (SOU.3) East of Glanos -? -? + 0 - + 0 - 0 - N/A + + + 0 + 0 - 0 - N/A + + + + 0 - 0 - 0 - N/A + + + + 0 - 0 - 0 - N/A + + + + 0 - 0 - 0 - N/A + + + + 0 - 0 - 0 - N/A + + + + + 0 - 0 - 0 - N/A + + + + + 0 - 0 - 0 - N/A + + + + + 0 - 0 - 0 - N/A + + + + + 0 - 0 - 0 - N/A + + + + + 0 - 0 - 0 - N/A + + + + + 0 - 0 - 0 - N/A + + + + + 0 - 0 - 0 - N/A + + + + + 0 - 0 - 0 - 0 - N/A + + + + + 0 - 0 - 0 - 0 - N/A + 0 - 0 - 0 - N/A + 0 - 0 - 0 - 0 - 0 - 0 - 0 - 0 - 0 - 0																	
SOU.E (SOU.4) East of Banbury -? -? + 0 0 + 0 + 0 - N/A + ++ + 0 Road (240 dwellings)																	
SOU.C (SOU.14) East of Bypass (240 dwellings)	-ș	ŝ	+	0	-	+	s 0	+	0	-	0	+	N/A	+	++	+	0
SOU.B (SOU.15) West of Banbury Road (75 dwellings)	-Š	-Ś	+	0	0	+	s 0	+	0	-	0	-	N/A	-	++	+	0
					Sto	ockton											
STOC.A (STOC.16) South of Napton Road (east) (18 dwellings)	-	\$	+	0	0	+	0	+	0	-	0	+	N/A	+	+	-	0
STOC.B (STOC.08) East of Jubilee Fields (24 dwellings)	-	Ś	+	0	0	+	0	+	0	-	0	+	N/A	+	+	+	0
					Stratford	l-upon-	Avo	n									
STR.A (STR.14) East of Shipston Road (210 dwellings)	0	Ś	+	0	-	+	s 0			0	0	+	N/A	-	++	+	0
STR.B (STR.16) North of Evesham Road (88 dwellings)	-ŝ	ș	+	0	-	+	0	-		0	0	+	N/A	+	++	+	0
					Tid	dington											
TIDD.A (TIDD.11) South of Sid Courtney Road (24 dwellings)	0	-Ś	+	-ŝ	0		0		-	0	0	+	N/A	+	+	+	0

					Tre	dington											
TRED.A (TRED.04) South of Blackwell Road (13 dwellings)	-ŝ	Ś	+	0	0	+	s O	+	0	0	0	+	N/A	+	+	+	0
					T	ysoe											
TYS.A (TYS.14) West of Sandpits? + 0 0 + 0 + 0 0 0 + N/A + + - 0 Lane (12 dwellings)																	
TYS.B (TYS.16) North of Saddledon Street (12 dwellings)	-	ș	+	0	-	+	0	+	0	0	0	+	N/A	+	+	+	0
					Welfor	d-on-A	on/										
WELF.A (WELF.10) East of Hunt Hall Lane (30 dwellings)	0	-ș	+	0	0	+		-	0	0	0	+	N/A	+	+	+	0
WELF.B (WELF.17) East of Hunt Hall Lane (north) (15 dwellings)	0	-ș	+	0	0	+			0	0	0	-	N/A	+	+	+	0

### **Self-Build & Custom Housebuilding**

- 6.32 Draft approaches to a policy on meeting self-build & custom housebuilding needs was tested through SA and reported in the Initial SA Report (December 2017 and the SA Report (June 2019) accompanying the drafts of the SAP for consultation. The Policy has been refined and updated into the new proposed Policy SAP.6. The SA has been is updated and details are included within this SA Report in Appendix XII (a). Initially, the SA tested 3 site options for allocation as self-build & custom-build housing, then a further 6 options were available in 2019; the SA findings are detailed in Appendix XII(b). Please note that one new self-build site identified in 2020 North of Idlicote Lane, Halford was initially subject to SA as an Amber site and is reported in Appendix VIII of this SA Report.
- **Policy SAP.6**: The SA noted that there is potential for negative effects on 6.33 important or sensitive heritage, landscape and biodiversity but that policy mitigation measures are in place through the requirement for each plot to provide a Design Code or Plot Passport. The supporting text explains that the design guide/plot passport should cover such matters as building form, density, footprint of dwellings, building lines, materials, boundary treatment, landscaping, and waste facilities. The Policy requires connections to water and drainage and provision for suitable arrangements for surfacewater outfall, with a neutral effect. Legal access to a public highway must be achieved for each plot, which will ensure any development has good access to the highway network, with a minor positive effect for SA objective No 5. The Policy support for Modern Methods of Construction (MMC) with high levels of environmental performance provides strong mitigation measures for environmental objectives, including for climate change and reducing emissions.
- 6.34 Enabling such housing, integrated within the 2 new settlements and dispersed throughout the District, will have major positive effects for housing in the District. Also, positive effects for health through provision of good quality housing, including through support for Modern Methods of Construction (MMC). The provision of allocated sites dispersed through the District and the provision for unallocated sites as individual and small groups of plots within the BUABs or suitable sites adjacent to the BUABs will have positive effects on local communities and avoid negative effects on the identity of settlements.
- 6.35 Overall, potential negative effects have been mitigated through the small size of the plots/groups of plots, their dispersal throughout the district area, and specific requirements in the Policy to ensure the timely provision of good quality housing. Overall, minor to major positive effects.
- 6.36 **Proposals SCB1-SCB11**: The initial SAs of the self-build and custom housebuilding site options found mostly neutral effects for environmental objectives (due to the small size of the plots and location of options) and positive effects for housing, health and communities through provision of specific types of housing that contribute to the mix throughout the District area. Two sites (one at Alderminster and one at Harbury) were found to have potential minor negative effects as they are located within a surfacewater

- safeguarded zone. However, mitigation measures to ensure pollution control and protection of natural resources are provided through Core Strategy Policies CS.4, CS.6 and CS.9. Policy SAP.3 also requires provision of suitable arrangements for surfacewater. Therefore, effects mitigated to neutral.
- 6.37 All sites were found to have potential for minor negative effects on SA objective no 10 for access/sustainable transport as, whilst some are within walking distance of a bus stop and some key services/facilities, development is not likely to reduce the reliance on private vehicles. However, where relevant and possible, the Council has included site-specific requirements to improve sustainable transport Proposals SCB.1, SCB.6 & SBC.11 providing mitigation measures and enhancements that will have some minor positive effects.
- 6.38 Most of the proposed sites are not located on the best and most versatile agricultural land (BMVL), indicating positive effects for soil/land objective; however, one site in Salford Priors SCB.7 does contain BMVL with major negative effects that will be permanent for loss of the soils resource & one site at Wellsbourne SBC.11 includes some BMVL in part. The sites will not result in any loss of public open space or green infrastructure, indicating positive effects. The small size of the plots indicates that there will be negligible contributions to climate change emissions. The requirement in Policy SAP.6 to ensure legal access to the highway for vehicles, pedestrians and cyclists confirms positive effects for SA No 5 on traffic access/climate change.
- 6.39 The Policy SAP.6 supports Modern Methods of Construction (MMC) that seeks to provide good quality housing with high levels of environmental sustainability. This together with Core Strategy Policies will confirm the positive effects for emissions and climate change objectives. The MMC and further site-specific requirements will confirm at least neutral effects for the historic environment and landscape objectives; there may be minor positive effects but uncertainty at this stage until detailed design. In line with national planning policy requirements for all development to achieve a net gain in biodiversity, minor positive effects are confirmed for SA objective Nos 3 and 6.
- 6.40 Overall, the relatively small sizes of the sites and their dispersal throughout the District area, mitigates for some of the minor negative effects indicated for limited access to services/facilities and limited encouragement for more sustainable modes of transport. Positive effects indicated for the timely provision of good quality housing, with further positive effects for health and communities. The summary findings of the SA of the sites, refined to include the implications of the site-specific requirements and Policy SAP.6, are shown in the Table 6.4, as follows:

Table 6.5: Self-Build & Custom Housebuilding Policy SAP.6 Site Allocations SCB.1-SCB.11 - Summary SA

1dble 6.5: 3el	I-DU	iiu s							у го	псу	SAI	.0 3	ile /	41100	Julie	2115	3CD	. 1 - 3	CD.	<u> </u>	3011	mai
			Site	Pro	pose	als S	CB.1	-9														
SA Objective	SCB.1 North of Allimore Lane,	Alcester	SCB.2 Land East of Skylark	Road, Alderminster★	SCB.3 North of Idlicote Lane,	Halford	SCB.4 Land West of Bush	nedin Lane, narbury.⊁	SCB.5 North of Collingham		SCB.6 North of Dog Lane,		SCB.7 West of Evesham		SCB.8 West of Coventry	אסמת, אסטווומווו	SCB.9 Land West of Jubilee	rieids, siockioii ♣ ;	SCB.10 North of Millers		SCB.11 North of Walton	NOGO, MOISOCOTIO
1. Heritage	(	0		)	(	)	(	)	(	)	(	)	0	ś	(	)	(	)	(	)	C	)
2. Landscape	(	0	(	)	(	)	(	)	(	)	(	)	O	Ś	(	)	(	)	(	)	C	)
3. Biodiversity & Geodiversity	-	+	7	ŀ	-	+	-	+	4	ŀ	-	ŀ	-	ŀ	-	+	+	+	-	ŀ	+	ŀ
4. Flooding	(	O	(	)	(	)	(	0	(	)	(	)	(	)	(	)	(	)	(	)	(	)
5. C Change: Traffic	-	+	7	+	-	+	-	+	4	+	+	۲	-	+	-	+	4	+	-	+	+	+
6. C Change: GI	-	+	4	ŀ	-	+	-	+	4	ŀ	+	ŀ	-	ŀ	-	+	-	+	-	ŀ	4	-
7. Natural resources <sup>50</sup>	0	+	0	+	0	+	0	+	0	+	0	+	0		0	0	0	+	0	+	0	-
8. Pollution (Air & Water)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

<sup>&</sup>lt;sup>49</sup> ★ As site options, Subject to SA in December 2017; other site options subject to SA in June 2019 – all updated as site Proposals in 2020

 $<sup>^{50}</sup>$  First symbol relates to Minerals; second symbol relates to Agricultural Land Quality

9. Waste	0	0	0	0	0	0	0	0	0	0	0
10. Accessibility & Transport	-	-	-	-	-	-	-	-	-	-	-
11. Rural communities	N/A										
12. Settlement Identity	+	+	+	+	+	+	+	+	+	+	+
13. Housing	+	+	+	+	+	+	+	+	+	+	+
14.Communities & Health	+	+	+	+	+	+	+	+	+	+	+
15. Economy & Employment	0	0	0	0	0	0	0	0	0	0	0

# Built-Up Area Boundaries (BUABs): Policy SAP.7

- 6.41 The Council investigated three approaches to defining boundaries (tight, loose, none) for Stratford-upon-Avon and the Main Rural Centres, and the Local Service Villages. These were tested through SA for initial consultation in early 2018 findings are summarised in this SA Report previously in section 5 (paragraphs 5.12-5.26) with details in Appendix III. The Council has progressed the preferred approach of a tight boundary with Policy SAP.6 that supports in principle development proposed within the BUABs shown. Supporting text provides explanation and further guidance.
- 6.42 The findings of the previous SA remain valid and relevant (Table 5.1 & Appendix III). Provision of such boundaries indicates likely neutral or minor positive effects for sustainability topics. Policy SAP.7 makes clear that new development outside the defined BUABs will only be supported in principle subject to the provisions of Policy AS.10 Countryside & Villages in the Core Strategy<sup>51</sup>. This provides mitigation measures through principles of small-scale development and other requirements against potential minor negative effects indicated for landscape, transport, communities, and settlement identities. Overall, Policy SAP.7 is likely to have neutral or minor positive effects on sustainability topics.

# **Employment Enabling Sites: Policy SAP.8**

- 6.43 In recognition of the shortage of available and affordable sub-prime business floorspace in the Stratford-on-Avon District, the Council has prepared this Policy to clarify that proposals for employment development not specifically provided for in Policies CS.22 and AS.10 in the Core Strategy will be considered on their merits. The Policy requires sites to be within the BUAB of a settlement or on the edge/in close proximity to the settlement. The appropriateness of the location will be considered taking into account the relationship of the site to the settlement, impacts on local amenity, impacts on the local highway network and availability of sustainable transport. These requirements provide mitigation measures for any potential negative effects on transport/access and promote positive effects for communities and settlement identities.
- 6.44 Potential negative effects on environmental factors will be mitigated through other Core Strategy Policies, and Policy SAP.8 makes clear that relevant policies will be applied. The Policy requires evidence of employment need, together with justification taking into account the indicated socio-economic benefits. This indicates that overall, positive effects are likely for SA Objectives on communities and economy/employment. The findings of the previous SA

<sup>51</sup> https://www.stratford.gov.uk/planning-regeneration/core-strategy.cfm

remain valid and relevant (please see previous section with Table 5.4 & as detailed in Appendix  $V^{52}$ ).

### A46 Safeguarding: Policy SAP.9

6.45 The Policy SAP.9 safeguards land at 2 locations in order to facilitate improvements to the A46 within Stratford-on-Avon District – until such time that funding is available. The findings of the previous SA remain valid and relevant (Table 5.4 & Appendix V). The SA had found potential major positive effects on access/traffic, communities and economy/employment since such improvements will resolve an existing sustainability problem of traffic congestion. Minor positive or neutral effects were indicated for other SA Objectives with some uncertainties indicated due to gaps in evidence. Minor negative effects were indicated for biodiversity, and loss of agricultural land.

# Specific Site Proposals: SUA.2, SUA.4-SUA.8, BID.1, STUD.1-2, RURAL.1-5

6.46 Options for specific site proposals became identified at different times and therefore, were subject to SA at different times but using the same SA framework of objectives and in a comparable manner. The dates of the SA Reports and the consultation periods are as summarised in Table 6.5, as follows:

Table 6.6: Specific Sites – Dates for SA

Specific Site Proposal	Dates: SA Reports & Consultation
South of Alcester Road,	December 2017
Stratford-upon-Avon	Feb-March 2018; Aug-Oct 2019; Oct 2020
Atherstone Airfield	December 2017
	Feb-March 2018; Aug-Oct 2019; Oct 2020
East of Shipston Road,	December 2017
Stratford-upon-Avon	Feb-March 2018; Aug-Oct 2019; Oct 2020
Napton Brickworks	December 2017
	Feb-March 2018; Aug-Oct 2019; Oct 2020
University of Warwick,	December 2017
Wellesbourne Campus	Feb-March 2018; Aug-Oct 2019; Oct 2020
High Street, Studley	December 2017
	Feb-March 2018; Aug-Oct 2019; Oct 2020
Studley Enterprise Centre	December 2017
	Feb-March 2018; Aug-Oct 2019; Oct 2020
Rother Street/Grove Street,	December 2017
Stratford-upon-Avon	Feb-March 2018; Aug-Oct 2019; Oct 2020

<sup>&</sup>lt;sup>52</sup> Available separately as SA of Further Proposals SA Addendum Report (February 2019)

Gateway Quarter, Stratford- upon-Avon	February 2019 Feb-March 2019; Oct 2020
Quinton Rail Technology Centre	February 2019 Feb-March 2019; Oct 2020
Land at Stratford-upon-Avon College, Alcester Road, Stratford-upon-Avon	June 2019 Aug-Oct 2019; Oct 2020
Meon Vale/Former Long Marston Depot	July 2020 October 2020
Long Marston Airfield Phase 1b	July 2020 October 2020
Bidford Centre, Bidford-on- Avon	August 2020 October 2020

- 6.47 The findings of the initial SAs remain valid and relevant and details are set out in Appendices IV and V of this SA Report. The early SAs in 2017 & 2018 informed the refinement of the Site-Specific Proposals that include site-specific requirements to reduce likely negative effects. The SA in 2019 & 2020 made limited further suggestions to improve the sustainability of the Proposals, as follows:
  - Proposal SUA.2 could include a requirement for Travel Plans that facilitate/encourage sustainable transport for employees
  - Enhancement of ecological features could be aligned with objectives and priorities in the District's green infrastructure strategy
  - RURAL.4 with a watercourse running through the site potential for enhancements to the wider GI network
  - RURAL.5 with lanes and footpaths in the area has potential for enhancements to the wider sustainable transport & GI networks
- 6.48 The implications for the initial SA findings through the refinement and development of the Proposals including site-specific requirements as mitigation measures are considered in the following paragraphs:
- one of the Canal Quarter Regeneration Zone to relocate, thus helping to ensure implementation and confirming positive effects that could be synergistic and cumulative in the longer term. The provision of good quality employment will also have positive effects for communities and health. The development will extend the existing built form of the settlement

to the west, with a potential minor negative effect on local identity but some uncertainty remains at this stage of assessment.

- 6.50 The Proposal lists specific requirements for vehicle access, improvements to the Wildmoor Roundabout, and improvements to the A46 adjacent to the site confirming the earlier minor positive effects on traffic/climate change emissions as this will help resolve an existing sustainability problem for congestion. It further requires provision of a frequent bus service into the development, an approved Travel Plan, and appropriate facilities for pedestrians and cyclists thus providing mitigation measures for the previous minor negative effects on SA Objective No 10 on transport, since such provision will help reduce the reliance on use of private vehicles. The relocation of businesses from the Canal Quarter could result in reduced traffic and improved air quality within the Air Quality Management Area. The encouragement in the Proposal indicates that there is more certainty to this; however, some uncertainty remains for positive effects with the SA for SA Objective No 8 on air quality.
- 6.52 The initial SA had found likely minor negative effects for landscape/visual impacts SA Objective No 2. The Proposal SUA.2 includes a requirement for extensive landscaping on the southern and western boundaries of the employment development, thus providing mitigation measures that will reduce the negative effects towards neutral but with some uncertainty at this stage. There is some best and most versatile agricultural land to the south of the site and loss of this soil resource will be minor negative and permanent.
- 6.53 The initial SA had assumed that other Core Strategy Policies would provide sufficient mitigation to reduce effects on biodiversity to neutral. Proposal SUA.2 includes requirements to manage the mature hedgerows on the road frontages; also, to protect and enhance ecological features. This recognises locally important biodiversity and confirms mitigation measures will be implemented to at least neutral. With the national requirement<sup>53</sup> for net biodiversity gain from all new development, there will be minor positive effects that will be cumulative in the longer-term particularly if aligned with green infrastructure<sup>54</sup> in the area. It is noted that a planning application has been submitted that generally satisfies these matters and thus confirming likely minor positive effects.
- 6.54 **Proposal SUA.4 Atherstone Airfield, near Stratford-upon-Avon**: The site covers approximately 19 hectares gross (10 hectares net) to assist in the delivery of the Canal Quarter Regeneration Zone (Strategic Allocation SUA.1 in Core Strategy CS.16) and the needs of business elsewhere in the District. The Proposal relates to delivery during Phases 2-4 (2016/17-2030/31). The initial SA had found neutral effects with SA Objective No 15 on economy/employment as the proposal is concerned with relocating businesses. However, the Proposal now provides an opportunity for employment development to assist the local economy by providing greater scope for businesses in the District as

soa276\_August 2020 114/131 Enfusion

<sup>&</sup>lt;sup>53</sup> NPPF, 2019

<sup>54</sup> https://www.stratford.gov.uk/planning-regeneration/landscape-and-green-infrastructure.cfm

- a whole with likely minor positive effects. Provision of good quality and local employment will have positive effects on health and communities.
- 6.55 As with the SA of Proposal SUA.2, such relocation could reduce negative effects on traffic and associated air quality, but uncertainty of positive effects remains until project level studies. Proposal SUA.4 retains specific requirements for improving access off Shipston Road, if required, and the local road network, to be identified through a detailed transport assessment. Minor negative effects remain for SA Objective No 10 on transport, since the location will not help reduce the reliance on use of private vehicles, although there is a bus service along Shipston Road.
- 6.56 Some 50% of the site comprises best and most versatile agricultural land and this loss of the soils resource will be permanent possibilities for mitigation are not known at this stage. The SA had found minor negative effects for landscape, but the site-specific requirements include structural landscaping around the boundaries of the site to consolidate and complement that which already exists providing mitigation measures to reduce effects towards negligible/neutral with some uncertainty until detailed design.
- 6.57 **Proposal SUA.5 East of Shipston Road, Stratford-upon-Avon:** The site is approximately 3 hectares and seeks to relocate specific businesses from Wharf Road within the Canal Quarter Regeneration Zone during Phases 2-3 (2016/17-2025/26). The initial SA findings remain valid and relevant. Major negative effects are indicated for SA Objective No 7 Natural Resources as the site is almost completely grade 3a best and most versatile agricultural land with permanent loss of the soils resource. The previous SA had noted that the site is within a high groundwater vulnerability zone mitigation measures are provided through Core Strategy Policies CS.4, CS.6 and CS.9 with residual neutral effects indicated.
- 6.58 The Proposal SUA.5 requires provision of access off Shipston Road to be identified in a Transport Assessment, together with requirements for pedestrian and cyclist access to the adjacent Rosebird Centre helping to confirm the positive effects on traffic/access. There is a requirement to avoid unacceptable impacts on neighbouring residential uses and this removes the previous comment in the SA regarding permissions for nearby care homes and potentially conflicting neighbouring land uses. The SA had found potential negative effects for landscape but Proposal SUA.5 includes a requirement for extensive structural landscaping around the boundaries and this provides mitigation measures some uncertainty of effectiveness until project level studies.
- 6.59 **Proposal SUA.6 Stratford-upon-Avon Gateway**: This covers the area incorporating Henley Street, Windsor Street & Arden Street with retention of existing activities and redevelopment of specific parts for a range of appropriate uses. The SA mostly found positive or neutral effects for SA Objectives. There are heritage designations within and adjacent to the site with potential for minor negative effects but some uncertainty until project level studies and they should be mitigated through other Core Strategy Policies, especially CS.8. Proposal SUA.6 requires protection and

- enhancement for the Conservation Area, and the settings of heritage assets could be enhanced through the overall vision and masterplanning for the site.
- 6.60 The initial SA indicated uncertainty for traffic and access. Proposal SUA.6 includes site-specific requirements for improvements to the junction of Arden Street, Clopton Road & Birmingham Road, including a new pedestrian route and cycle (if possible) all with positive effects. Requirements also include replacement/improved public car parking and coach/bus station drop off facility all with positive effects that could be synergistic and cumulative for encouraging more use of sustainable transport modes. This confirms the previous SA findings for major positive effects in this respect.
- 6.61 Further site-specific requirements for high quality buildings/public realm, mix of uses, replacement/improved health facilities, and retention of the vitality of the town centre confirm the positive effects indicated by the previous SA. Overall, this Gateway Proposal will have major positive effects through enhancement of the existing area, integration with adjacent regeneration, provision of high-quality buildings and public realm including enhancements to green and blue infrastructure. The provision for employment, housing, leisure, community and education facilities, together with replacement/improvement of health facilities, will all have major positive effects for communities, health and local identities.
- 6.62 Proposal SUA.7 Rother Street/Grove Road/Greenhill Street, Stratford-upon-Avon: Approximately 2.4 hectares for retention of existing activities and redevelopment of specific parts of the site for a range of appropriate uses for delivery in Phases 2-4 (2016/17-2030/31). The initial SA mostly found positive or neutral effects for SA Objectives. Minor negative effects had been indicated as there are a number of heritage assets and their settings. However, site-specific requirements include protection of the Conservation Area, retention of Listed Buildings and those of historical significance, and archaeological assessments. These requirements provide mitigation measures, which together with other Policy requirements especially CS.8, should reduce the negative effects and could provide enhancement to settings.
- 6.63 **Proposal SUA.8 Land at Stratford-upon-Avon College, Alcester Road, Stratford-upon-Avon:** Warwickshire County Council has advised of a capacity issue in secondary education at Stratford-upon-Avon. The land currently used for car parking at the college and adjacent to the Stratford-upon-Avon High School has been allocated to safeguard it for educational purposes.
- 6.64 The SA found minor positive or neutral effects for most SA Objectives. As this is a brownfield site, major positive effects were identified for natural resources (soils) and as the site is well connected with sustainable transport modes, major significant effects found for SA Objective No 10. Safeguarding the land for educational purposes will have positive effects for health and communities. It will also support continuing local employment with some positive effects, although uncertainty as to the precise significance.

- 6.65 **Proposal BID.1 Bidford Centre, Bidford-on-Avon**: Public space to act as new centre for the village supported by mix of uses including retail, business and commercial uses over approximately 1 hectare. The SA found minor positive or neutral effects for most SA Objectives. As this is a brownfield site, major positive effects were identified for natural resources (soils) SA Objective No 7 and as the site is well connected with sustainable transport modes, positive effects found for SA Objective No 10. There were no significant negative effects.
- 6.66 The site is not near to any heritage assets and their settings with neutral effects. The site is within an existing industrial estates area and the SA had noted that redevelopment or new development could provide enhancements to local landscape, with a potential major positive effect. The Proposal requires high quality public realm to act as a new focal point for the village and an overall enhancement to the landscaping of the site and this confirms that such improvements will be delivered, confirming the likely positive effects.
- 6.67 The intention for a new centre for the village with the site forming a transition between the residential and employment areas strengthens the vitality of both with further positive effects on communities and objectives for economy/employment. It is also noted that the development of such a new centre in a more sustainable location could also help revitalise the historic high street with its richness of Grade II Listed Buildings and the Grade 1 river bridge as a destination for leisure-related retail activities. This could enhance the settings of the historic buildings with further positive effects in the longer term.
- 6.68 **Proposal STUD.1 Studley Centre, Studley**: Approximately 0.3 hectares south of High Street for public space to act as a new village centre supported by a mix of uses including small business units, residential units, retail and commercial units to progress Phases 2-4 (2016/17 2030/31). The initial SA mostly found positive or neutral effects for SA Objectives. The SA had indicated potential minor negative effects for traffic, and air/water quality, as the site is in the AQMA and a Groundwater Vulnerability Zone. However, other Core Strategy Policies provide mitigation measures; and the Proposal STUD.1 includes site-specific requirements on adjacent uses, parking, and for enhancement of the overall appearance of the site with hard and soft landscaping all will confirm the likely positive effects found by the SA.
- 6.69 The Proposal seeks to enable new start-up businesses and entrepreneurs with major positive effects for local employment which will also have positive effects for health and local communities. The requirement for high quality public realm to act as a focal point for the village will further enhance objectives for communities, health and economy/employment.
- 6.70 **Proposal STUD.2 High Street, Studley**: Approximately 0.3 hectares east of High Street for residential and commercial uses for delivery to progress Phases 2-4 (2016/17 2030/31). The initial SA mostly found positive or neutral effects for SA Objectives. The SA had indicated potential minor negative effects for traffic

and air/water quality, as the site is in the AQMA and a Groundwater Vulnerability Zone. However, other Core Strategy Policies provide mitigation measures. The site-specific requirements to create an attractive frontage to the High Street, including incorporation of commercial units at ground level, will confirm the positive effects on SA Objective Nos 2, 6, 10, 12, 13 & 15. The requirement to protect the setting of the adjacent Listed public house confirms specific mitigation measures will be implemented, supporting CS.8 and confirming positive effects for SA Objective No 1. The redevelopment of this site as part of the wider regeneration of the village centre will have positive effects for health and communities.

- 6.71 Proposal RURAL.1 Napton Brickworks, near Napton-on-the-Hill: Approximately 10 hectares south off Daventry Road, of which approximately 3 hectares net for residential development. The initial SA found positive or neutral effects for most SA Objectives. The extent of the detailed site-specific requirements will help ensure that such positive effects are implemented and that negative effects are mitigated. The previous SA had found minor negative effects for water quality as it is located in protected zones; however, other Core Strategy Policies will provide mitigation measures. Site-specific requirements ensure that the former quarry slopes remain stable, drainage into the canal is regulated and managed, and that development does not have an adverse impact on the integrity of the canal all providing strong mitigation measures to protect the water environment. Enhancement is possible through the requirement to ensure that development is well-related to the canal.
- 6.72 The previous SA had identified potential major negative effects on landscape due to the particular characteristics of the area and its sensitivity. This is mitigated to some extent through restricting the housing development to previously developed parts of the site and retaining existing hedgerows and trees along the site boundaries. The site-specific requirements for a comprehensive management plan, mitigating noise impacts of adjacent business uses, and securing appropriate treatment of any contamination from previous uses (quarry) will ensure that such mitigation is implemented and reduce the previous SA findings to at least minor negative with some uncertainty until detailed design.
- 6.73 The initial SA had found minor negative effects for biodiversity and transport. Proposal RURAL.1 includes site-specific requirements to undertake comprehensive ecological and geological assessments these will guide the specific mitigation measures as necessary indicating possibilities for reducing negative effects to at least neutral and to positive through the requirement for biodiversity gain. 55 The Proposal specifically requires that any harm to the Local Wildlife Site should be mitigated thus ensuring no negative effects to this designated area.
- 6.74 The previous SA had found a minor negative effect since the site is within a water safeguarded zone; however, Core Strategy Policies will provide mitigation to neutral. The site-specific provision for a high-quality walking and

soa276\_August 2020 118/131 Enfusion

<sup>&</sup>lt;sup>55</sup> NPPF, 2019

cycling route along Brickyard Land to/from Napton-on-the-Hill provides potentially strong mitigation measures to minimise the effects on SA Objective No 10 and promotes more sustainable transport with potential for minor positive effects; some uncertainty still at this stage. The provision of this walking/cycling link will also help to mitigate the lack of good integration with the existing settlement. Provision of good quality housing will have positive effects for health and communities.

#### 6.75 Proposal RURAL.2 University of Warwick Campus, near Wellesbourne:

Approximately 110 hectares to provide Innovation Campus for research and educational purposes with associated staff and student accommodation – to progress Phases 3-4 (2021/22-2031/31). The initial SA found positive or neutral effects for most SA Objectives. The extent of the site-specific requirements will help ensure that such positive effects are implemented through specific mitigation of certain potential negative effects. The previous SA had found minor negative effects for water quality as the site is located in a water safeguarded zone; however, other Core Strategy Policies will provide mitigation measures.

- 6.76 The site-specific requirements to mitigate impacts on Charlecote Conservation Area, the Scheduled Monument, and setting of Charlecote House & Registered Park ensure that specific mitigation measures will be implemented to confirm the neutral effects on the historic environment found by the previous SA. The requirement for extensive landscaping and areas of open space ensures that mitigation measures will be implemented to confirm likely positive effects on landscape. The Proposal specifically requires that any harm to the Local Wildlife Site should be mitigated thus ensuring no negative effects to this designated area.
- 6.77 Requirements to undertake a comprehensive Transport Assessment to establish the nature of highway improvements needed will ensure that such mitigation is implemented to confirm the neutral effects from the previous SA. Minor negative effects had been indicated for SA Objective No 10 due to distance from key services/facilities but these could be available on the campus; also, there is an existing footpath through the road with opportunity for sustainable transport and with potential for neutral effects but some uncertainty at this stage. Provision of such an innovation campus for research and education will have positive effects on health and communities.

# 6.78 Proposal RURAL.3 Quinton Rail Technology Centre, near Long Marston: Approximately 49 hectares that was part of the former Long Marston Depot, south of Station Road, and development to comprise rail-based innovation and technology centre. The initial SA found positive or neutral effects for most SA Objectives. The extent of the site-specific requirements will help ensure that such positive effects are implemented through specific mitigation of certain potential negative effects. The site-specific requirement to incorporate comprehensive management of ecological features and retain existing trees ensures that such mitigation measures should be implemented

- and confirms the neutral effects for biodiversity; enhancement should be achieved through the requirement for biodiversity gain.<sup>56</sup>
- 6.79 The previous SA had identified potential major negative effects as the site is some distance from public transport and key services/facilities. However, the SA also noted that additional employment uses could help sustain the bus service, so some mitigation is possible but uncertain at this stage. The Proposal requires a comprehensive Transport Assessment for any large-scale increases in employment and this will help identify any necessary mitigation measures. One site-specific requirement is to not impede the area of safeguarding for possible reinstatement of the Stratford-Honeybourne railway line with the potential for wider major positive effects for sustainable transport in the longer term, that could be synergistic and cumulative. Positive effects confirmed for SA Objectives for communities and health, and major positive effects for employment/economy that could be synergistic and cumulative in the longer term.
- 6.80 Proposal RURAL.4 Meon Vale (Former Engineers Resources Depot), Long Marston: Approximately 32 hectares for provision of up to a maximum of 300 houses, of which 35% are to be provided as affordable housing. This is a new site and was tested in 2020 through SA in a comparable manner to the initial SAs with details of findings presented in Appendix IV of this SA Report. The SA found neutral effects for objectives on heritage, minerals, air/water quality, and waste. The Proposal is for residential use, so neutral effects for employment, although it is acknowledged that provision of good quality housing will support positive effects for the local economy.
- 6.81 Access to the site would need to be gained via the new road network constructed to serve the different phases of development within the wider MOD former depot site. Due to the distance to Stratford-upon-Avon some 8 km to the north for main goods and services, there would be reliance on vehicle use. There are known congestion issues within Stratford<sup>57</sup> and thus the SA found major negative effects for the highway network and access but there will be some mitigation measures through local highway improvements. There are likely cumulative negative effects for transport objectives with other major developments in the vicinity – the former Long Marston Airfield site that is currently restricted in number of dwellings possible until construction of a relief road to protect Stratford town from further unacceptable congestion. The supporting text of the Proposal explains that the capacity of the highway network to accommodate additional vehicular traffic remains to be resolved to the satisfaction of the council – indicating that mitigation measures are in place – but some uncertainty of the significance of negative effects at this stage.
- 6.82 The SA had found some negative effects for landscape due to the proximity of the Cotswolds AONB and the location of the site in an open arable landscape. Also, some concern for flooding associated with the drain/watercourse running through the site but site-specific requirements

<sup>56</sup> NPPF, 2019

<sup>57</sup> Warwickshire County Council (2011) Warwickshire Local Transport Plan

- include that hydraulic modelling should be undertaken of the proposed development indicating mitigation measures are in place.
- 6.83 The SA found positive effects for biodiversity, the soils resource through reuse of brownfield, walking distance to services/facilities, and retaining settlement identity. Major positive effects were identified for green infrastructure with the possibilities for enhancement of the existing trees, hedgerows and watercourse, provision of housing, and with nearby facilities, including the existing leisure centre, for health and communities. The site-specific requirements for provision of publicly accessible green spaces throughout the site should confirm the implementation and secure the indicated positive effects.
- 6.84 **Proposal RURAL.5 Long Marston Airfield Phase 1b**: Approximately 37 hectares for up to 500 homes of which 35% are to be provided as affordable housing, and approximately 6 hectares of employment land. This is a new site and was tested in 2020 through SA in a comparable manner to the initial SAs with details of findings presented in Appendix IV of this SA Report. The SA found neutral effects for objectives on heritage, landscape, flooding, highways/access, minerals, air/water quality, waste, and settlement identity.
- 6.85 Major negative effects predicted for highways and transport, including potential for cumulative negative effects with other nearby major developments, former Long Marston Airfield, and known problems of congestion to the south of Stratford-Upon-Avon. However, recent transport studies indicate that the network has capacity for the proposed development in Phase 1b so overall uncertain neutral effects at this stage.
- 6.86 Major negative effects were identified for SA Objective 10 as there will still be reliance on the private car at least in the short-medium term until the other phases of the whole site area are developed. There are lanes and footpaths in the area, including long distance routes with the Monarch's Way to the south and west with potential for enhancements to the wider sustainable transport (and GI) network. The Proposal includes a specific requirement for structural landscaping and provision of vehicular, pedestrian and cycle connections between phases indicating that the wider sustainable transport and GI networks will be implemented with positive effects for health, communities, movement, and biodiversity/green infrastructure in the longer term.
- 6.87 The provision of up to 500 dwellings will have major positive effects for housing, health, and communities, with minor positive effects for employment/economy through provision of some 6 hectares of employment land. The site Phase 1b is part of a much wider development of a new settlement of 3,500 homes one of the Garden Villages identified in England and subject to a Supplementary Planning Document<sup>58</sup> that establishes a Masterplan for the whole site. This earlier smaller site will contribute to the

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<sup>&</sup>lt;sup>58</sup> https://www.stratford.gov.uk/planning-building/lma-draft-spd-consultation.cfm

overall development of the identity of the settlement with further synergistic positive effects for communities and GI.

6.88 **Site-Specific Proposals - Overall:** Much of the earlier SA findings are valid and relevant. The SA findings have been updated to reflect the amendments for some negative effects due to the implementation of mitigation measures now confirmed through site-specific requirements - thus, removing uncertainties or indicating a residual effect that approaches neutral. Overall, the strong positive effects for communities, housing, health, and economy/employment are confirmed, and negative effects have been reduced to negligible. As would be expected at this stage of plan-making and assessment, mitigation measures have been developed through site-specific requirements to avoid or minimise any negative effects, and secure opportunities to enhance positive effects. The summaries of the updated SA findings for the Specific Site Proposals are shown in Table 6.7, as follows:

Table 6.7: Specific Site Proposals – SA Summary

SA Objectives/ SAP Proposals	1 Heritage	2 Landscape	3 Biodiversity <sup>59</sup> & Geodiversity	4 Flooding	5 Climate Change	6 Green Infrastructure	7 Minerals		8 Air Quality	Water Quality	9 Waste	10 Accessibility & Transport	11 Rural Communities	12 Settlement Identity	13A Housing Overall	13B Affordable Housing	14 Community & Health	15 Economy & Employment
SUA.2 South of Alcester Road, Stratford-upon- Avon	0	0?	+	0	+	+	0	-	+?	0	0	0	0 N/A	-	0	0	+	++
SUA.4 Atherstone Airfield	0	0?	+	0	+	+	0	-	+?	0	0	-	0 N/A	+	0	0	+	+
SUA.5 East of Shipston Rd, Stratford-upon- Avon	0	0?	+	0	+	+	0		+	0	0	+	0 N/A	+	0	0	+	0
SUA.6 Stratford-upon- Avon Gateway	0?	+	+	0	+	+	0	++	+	0	0	++	0 N/A	++	+	+	++	++
SUA.7 Rother St/Grove Rd, Stratford-upon- Avon	0?	+	+	+	+	+	0	++	+	0	0	++	0 N/A	+	+	+	+	+
SUA.8 Land at College, Alcester Rd, Stratford- upon-Avon	0	+?	+	0	+	+	0	++	0?	0	0	++	0 N/A	0	0	0	+	+?
BID.1 Bidford Centre, Bidford-on-Avon	0	+	+	0	0	+	0	++	0	0	0	+	+	+	0	0	+	+

<sup>&</sup>lt;sup>59</sup> Please note that SA findings for biodiversity have been updated to minor positive effects in line with national planning policy that now requires all development to achieve net gain in biodiversity

soa276\_August 2020 123/131 Enfusion

STUD.1 Studley Centre	0	0	+	0	-	+	0	++	-?	0	0	+	0 N/A	+	0	0	+	++
STUD.2 High Street Studley	+	++	+	0	-	+	0	++	0	0	0	+	0 N/A	++	+	+	+	+
RURAL.1 Napton Brickworks	0	-?	+	0	0	+	0	+	0	0	0	+?	+	-	++	++	+	0
RURAL.2 University of Warwick, Wellesbourne Campus	0	+	+	0	0	+	0	+	0	0	0	0?	+	+	0	0	+	+
RURAL.3 Quinton Rail Tech Centre, Long Marston	0	+	+	+	-	+	0	++	0	0	0	?	+	+	0	0	++	++
RURAL.4 Meon Vale/ Former Long Marston Depot	0	-	+	-	-?	++	0	+	0	0	0	+	+	+	++	++	++	0
RURAL.5 Long Marston Airfield Phase 1b	0	0?	+	0	0?	++	0	+	0	0	0	0?	+	0	++	++	++	+

# SA of Implementing the Sites Allocation Plan (SAP)

- 6.89 Housing, Economy & Employment, Communities & Health, Rural Areas: Positive effects have been identified overall for housing and employment/economy, depending upon the specific uses of the development land proposals, and with major positive effects for certain sites due to their size and location. The Specific Site Proposals have been developed to adjust to changing circumstances since the adoption of the core Strategy. They have been refined to include site-specific requirements that will confirm the timely delivery of housing, land for employment and supporting services/facilities, where relevant.
- 6.90 The Reserve Housing Sites have been selected to be dispersed through the District within certain settlements. Policy SAP.1 makes clear the four purposes for identifying reserve housing sites - essentially to rectify any identified shortfalls and to contribute to meeting any identified additional needs for specific purposes. SAP.1 includes Annex 1 listing the preferred Reserve Housing Sites. Policy SAP.2 provides clarity and consistency of approach to releasing reserving sites for housing in Neighbourhood Plans, Policy SAP.3 details the mechanism for managing the release of reserve housing, together with Annex 2 that lists sites, settlements, and tranches for release. Policy SAP.4 addresses the requirement for releasing sites for Purpose D – Stratford-on-Avon's contribution to the shortfall in the Birmingham housing market area. Policy SAP.5 covers applications for reserve housing sites including requirements for delivery timescales. It also strongly supports proposals for zero/low carbon development, thus encouraging more environmentally sustainable housing with further positive effects for health and communities.
- 6.91 Policies SAP.1-SAP.5 secure the requirements arising from Policy CS.16 and confirm the major positive effects by providing more guidance and certainty for delivery within the plan period (to 2031). The Council has carefully selected reserve housing sites dispersed throughout the District area including with concern to reduce barriers for those living in rural areas and particularly for provision of affordable housing. Thus, opportunities for housing have been carefully selected to support objectives for health and communities. It is established that good quality housing has positive effects on health and well-being. Provision of such housing will also have positive effects on the local economy.
- 6.92 **Transport, Air Quality & Climate Change**: Congestion, aiming to reduce the use of or reliance on private vehicles and encourage more sustainable transport, are key issues for development planning in the District, particularly for Stratford-upon-Avon and the other larger settlements. Air quality and climate change objectives are closely linked with transport factors. The Council has investigated and selected Site-Specific Proposals that can help to resolve these issues. Where relevant and necessary, site-specific requirements associated with transport have been included in Proposals and thus, provide mitigation measures to avoid or minimise potential significant negative effects. Overall, the SA found potential minor positive effects for these sites as such development can help to resolve these existing sustainability issues.

- 6.93 The Council investigated and selected Reserve Housing Sites that are dispersed through the District. Whilst it is appreciated that within the Local Service Villages residents are likely to still rely on private vehicles to access some key services, air quality and congestions in these settlements has not been identified as a significant issue, and overall, the SA found potential neutral effects, including cumulative effects.
- 6.94 The SA found minor positive effects with regard to climate change and green infrastructure. None of the sites selected involved any loss of Public Open Space or Green Infrastructure (GI) and many sites were found to have possibilities for incorporating new or enhanced features. Policy SAP.5 strongly supports proposals for zero/low carbon development, thus encouraging more environmentally sustainable housing with further positive effects for climate change objectives.
- 6.95 **Historic Environment**: The District has a rich historic resource and generally sites have been selected to avoid any negative effects on such assets and their settings. Again, and where relevant and necessary, site-specific requirements have been included in Proposals to ensure no significant negative effects. Strong mitigation measures are provided through Core Strategy CS.8 that protects and enhances the historic environment with a positive approach. Therefore, the SA found likely neutral effects overall.
- 6.96 Landscape & Soils: For the Specific Site Proposals, site specific requirements are included to ensure that any potential negative effects are mitigated and that opportunities for enhancements are implemented; the SA found likely minor positive effects overall. For the Reserve Housing Sites, a range of effects were found from minor positive, through neutral, to potential minor and major negative. The SA has reported the potential for negative cumulative effects for certain settlements that have a high concentration of sites with major negative effects for landscape, and thence the possibility for cumulative effects for the District as a whole. The Reserve Housing Sites are dispersed throughout the District and this helps to provide some mitigation in relation to cumulative effects.
- 6.97 Core Strategy CS.5 Landscape provides strong mitigation through requiring the landscape character and quality of the District to be maintained and including consideration of cumulative impacts. In recognition of the possibilities for adverse impacts in particularly sensitive landscape areas, additional requirements to undertake a landscape assessment were included in the Proposals for Napton (RURAL.1), Wellesbourne (RURAL.2) and the Quinton Rail Technology Centre in Long Marston (RURAL.3); also a requirement to consider the impact on landscape character for Policy SAP.8 Employment Enabling Sites. These requirements will provide additional mitigation measures and contribute to reducing potential cumulative effects.
- 6.98 Sites have been selected which use previously developed land wherever possible, and to minimise the use of the best and most versatile agricultural land. Therefore, the SA found both positive and negative effects. The loss of soils and good quality agricultural land will have permanent and irreversible

effects. The use of previously developed brownfield land has major positive effects.

- 6.99 **Biodiversity & Geodiversity**: Sites have been selected to avoid internationally or nationally designated biodiversity and geodiversity indicating neutral effects. Where locally important assets have been identified, site-specific requirements have been included in the Policies and Proposals. Core Strategy CS.6 Natural Environment requires development to contribute to a resilient ecological network, recognising the inter-relationships between wildlife, people, the economy, and tourism. Policy CS.6 requires impacts to be minimised and, where possible, secure a net gain in biodiversity. The SA noted that with the recent updating of the NPPF, all development is required to deliver some biodiversity gain. Therefore, overall, the SA found minor positive effects in both the short and longer terms and such positive effects may be synergistic and cumulative in the longer term, particularly where integrated with the wider green infrastructure (and inter-related sustainable transport) network.
- 6.100 **Flooding & Water Quality:** Sites have been selected in accordance with national requirements to minimise risks from flooding; the SA found neutral effects overall. Some sites are located within Water Safeguarded Zones such that there was the potential for negative effects on water quality. However, where significant effects were identified, site specific requirements provide mitigation. Also, Core Strategy Policy CS.4 Water Environment & Flood Risk provides strong mitigation measures to promote the sustainable management of water resources and protect water quality. Overall, the SA found neutral effects.
- 6.101 The SA found overall effects for implementation of the SAP as a whole, as follows:

Table 6.8: Implementation of the SAP – SA Summary

Table 6.8: Implementation of tr	10 3/	<u> </u>	<u> </u>	3011		· ,						
SA Objective	SAP.1-5 Reserve	nousing sires	SAP.6 Self-Build &	Custom Housebuilding	SAP.7 Built-Up Area	boundaries (BUABS)	SAP.8 Employment	Endbling Sires	SAP.9 A46	sareguarding	Site Specific	Proposals
1. Heritage	0	?	(	)	0	)	(	)	(	)	(	0
2. Landscape		?	(	)	-	٠	(	)	(	)	-	+
3. Biodiversity & Geodiversity	1	+	-	٠	7	-	-	-	-	٠	-	٠
4. Flooding	(	)	(	)	(	)	(	)	(	)	(	0
5. Climate Change: Traffic	(	)		+	,	-	-	-	+	+		+
6. C Change: Green Infrastructure	4	ŀ	(	)	Ŧ	۲	(	)	(	)	-	+
7. Natural resources – Minerals; Agricultural Land	0	+	0	+	0	+	0	-	0	+	0	+
8. Pollution – Air Quality; Water Quality	0	0	0	0	0	0	0	0	0	0	0	0
9. Waste	(	)	(	<u> </u>	(	)	(	)	(	)	(	D
10. Accessibility to services & facilities; sustainable transport	(	)	(	)	+	+	-	٠		•		+
11. Reduce barriers for rural communities	4	٠	•	٠	0	)	(	)	+	۲	•	٠
12. Settlement Identity	4	٠	(	)	*	٢	(	)	(	)	•	٠
13. Housing	+	+	•	٠		۲	(	)	(	)	+	+
14.Communities & Health	4	<b>+</b>		٠	-	۲	+	+	+	٠	-	+
15. Economy & Employment	4	+	(	)	T	ŀ	+	+	(	)	+	+

### 7.0 PROPOSED MONITORING

7.1 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>60</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 Stratford-on-Avon District Council Monitoring Report<sup>61</sup> (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

 $<sup>\</sup>textcolor{red}{^{60}}\,\underline{\text{https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal}}$ 

<sup>61</sup> https://www.stratford.gov.uk/planning-regeneration/monitoring-information.cfm

### 8.0 CONSULTATION & NEXT STEPS

- 8.1 Comments received on the Preferred Options SAP and this SA Report (August 2020) will be considered and taken into account in the next stage of planmaking and Sustainability Appraisal (SA) the preparation of the PreSubmission SAP, which will also be subject to public and formal consultation.
- 8.2 Any comments on this SA Report should be made through the consultation portal on the Council's website:

https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan.cfm

### **APPENDICES**

- I Statement of Compliance with SEA Directive & Regulations
- Stratford-on-Avon Site Allocations Plan SA Scoping Report (2014) (available separately (<a href="https://www.stratford.gov.uk/planning-regeneration/">https://www.stratford.gov.uk/planning-regeneration/</a>)
- III SA of Options for Defining Settlement (Built Up Area) Boundaries (BUABs) (December 2017)
- IV SA of Proposals for Specific Sites (December 2017, June 2019 & July 2020)
- V SA of Further Proposals SA Addendum Report (February 2019) available separately (<a href="https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan/">https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan/</a>
- VI Representations to Consultations in 2017 & 2019
- VII SA of Scenarios X-Y & A-H (2020)
- **VIII SA of Options for Reserve Housing Sites** 
  - IX SA of Scenarios 1-5
  - X SA of Scenarios SB1-SB5 for Self Build & Custom Housebuilding
  - XI SA of Preferred Approach to Identifying Reserve Housing Sites
- XII Policy Self-Build & Custom Housebuilding (Va) and Options for identification in the SAP (Vb) (December 2017, Updated June 2019 & July 2020)