



ED.3.14

**Stratford-on-Avon District
Local Development Framework
Draft Core Strategy
Sustainability Appraisal**



OCTOBER 2008



Stratford-on-Avon District Local Development Framework Draft Core Strategy Sustainability Appraisal

October 2008

The sails symbol represents

- the cyclical nature of the planning process
- the importance of renewable energy in reducing global warming
- the iconic Chesterton Windmill that stands proud in our District

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Stratford-on-Avon District Local Development Framework
Draft Core Strategy – Sustainability Appraisal

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1. Introduction and Purpose of the Sustainability Appraisal

- 1.1 At the heart of the need to carry out a sustainability appraisal of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) is the fundamental objective of the planning system to facilitate the delivery of the Government's objective of achieving sustainable development.
- 1.2 Sustainable Development is defined in the West Midlands Regional Sustainable Development Framework as being about 'achieving a better quality of life for everybody without compromising the quality of life of future generations. A sustainable society is one that uses resources efficiently and sensibly; treats the environment responsibly and sensitively; meets social needs in a way that is fair and enables people to take part in and influence decisions that affect them; and where economic success is a means to maximising wellbeing rather than an end in itself.'
- 1.3 Sustainable development and the objectives it seeks to achieve give us the opportunity to revisit some of the original principles of social equity, the management of economic impacts, and proper mitigation of the environmental consequences of development. The shift in ethos of the planning system from land use planning to spatial planning provides a useful platform for the planning system to contribute significantly towards sustainable development.
- 1.4 It is often very difficult to balance the potential and real tensions that can exist between social, economic and environmental objectives. Sustainability Appraisals are a means for ensuring that a good balance is achieved between the three dimensions of sustainable development. It enables a critical assessment of each policy or proposal and the contribution it makes towards sustainable development. It also enables weaknesses in plans and programmes to be identified and mitigation measures introduced to make them as sustainable as they can possibly be. Furthermore, it enables these considerations to be taken into account at the early stages of the development plan document process.
- 1.5 Sustainability appraisal of Development Plan Documents is a requirement of the Planning and Compulsory Purchase Act 2004 and encompasses the provisions of European Union Directive 2001/42/EC (SEA Directive), which requires an assessment of the effects of certain plans and programmes on the environment. The key purpose of this European Directive is to provide adequate protection for the environment and to ensure the integration of environmental considerations into the preparation of plans and programmes. Sustainability Appraisals include a broader agenda than just consideration of environmental issues. They provide an integrated and comprehensive approach to spatial planning that covers environmental, social and economic issues; and also look at both the present and the future. Information contained in the appraisal process and report forms a key part of the evidence base to demonstrate how sustainable development is at the heart of the objectives and policies of a DPD, such as our Core Strategy.
- 1.6 The District Council recognises the useful contribution that Development Plan Documents make to the United Kingdom's (UK) sustainable development strategy. Indeed, it has been committed to carrying out a sustainability appraisal of its development plans even before it became a

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statutory requirement to do so. The Council has been concerned to ensure that the SA and the process for its preparation meet the requirements of both the Planning and Compulsory Purchase Act and the European Union Directive.

- 1.7 This SA Report relates to the Draft Core Strategy and its approach has been designed to be an integral part of the preparation process. The SA Report is published for public consultation alongside the Draft Core Strategy.

2. The Local Development Scheme

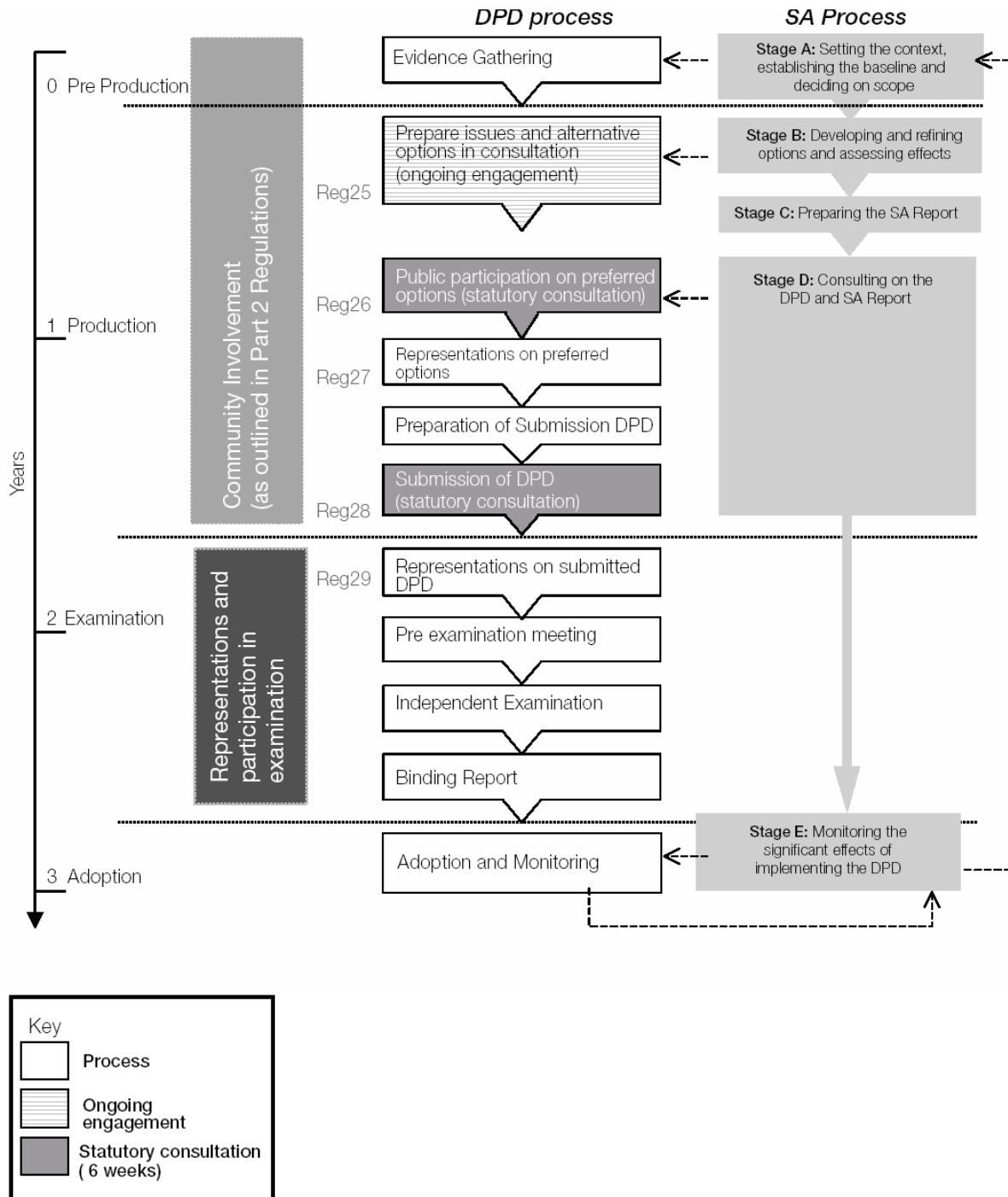
- 2.1 The Planning and Compulsory Purchase Act requires local planning authorities to prepare and maintain a 3-year project plan referred to as a Local Development Scheme (LDS). The LDS sets out the current documents which form the development plan for the planning of the District and provides a programme for the preparation of new local development documents. It also sets out a clear timetable for the various stages in the preparation of each document.
- 2.2 Under the 2004 Act, a separate SA is required for each new or revised DPD. Details of the current LDS are published on the Council's website (www.stratford.gov.uk) as part of its Annual Monitoring Report.

3. Sustainability Appraisal Process

- 3.1 It was decided that the SA would be carried out in-house, drawing from the expertise of all sections of the organisation as well as members of the Council, local organisations and the designated consultation bodies, through effective consultation at various stages of the process. Details of the consultation process are set out in Section 17 of this document. The final outcome of the SA will also be subjected to independent verification by an outside consultant to ensure objectivity and identify any gaps that need addressing.
- 3.2 Government guidance on the Sustainability Appraisal of Regional Spatial Strategies and Local Plan Documents published in November 2005 sets out five key stages for the preparation of sustainability appraisals of Development Plan Documents (DPD). These are:
- setting the context and objectives, establishing the baseline and deciding on the scope
 - developing and refining options and assessing effects
 - preparing the sustainability appraisal report
 - consulting on Draft DPD and Sustainability Appraisal Report
 - monitoring the significant effects of implementing the DPD.

The interrelationship between the preparation of Development Plan Documents and the SA process is set out in Figure 1 below.

Figure 1: The Development Plan Document preparation process (ODPM, 2005)



3.3 There are various tasks involved at each of the above stages. Figure 2 below sets out the tasks involved at the various stages.

Figure 2: Stages and tasks in producing a Sustainability Appraisal (ODPM, 2005)

DPD Stage 1: Pre-production – Evidence Gathering
SA stages and tasks
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> • A1: Identifying other relevant policies, plans and programmes, and sustainability objectives. • A2: Collecting baseline information. • A3: Identifying sustainability issues and problems. • A4: Developing the SA framework. • A5: Consulting on the scope of the SA.
DPD Stage 2: Production
SA stages and tasks
<p>Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> • B1: Testing the DPD objectives against the SA framework. • B2: Developing the DPD options. • B3: Predicting the effects the DPD. • B4: Evaluating the effects of the DPD. • B5: Considering ways of mitigating adverse effects and maximising beneficial effects. • B6: Proposing measures to monitor the significant effects of implementing the DPDs.
<p>Stage C: Preparing the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> • C1: Preparing the SA Report.
<p>Stage D: Consulting on the preferred options of the DPD and SA Report</p> <ul style="list-style-type: none"> • D1: Public participation on the preferred options of the DPD and the SA Report. • D2(i): Appraising significant changes.
DPD Stage 3: Examination
SA stages and tasks
<ul style="list-style-type: none"> • D2(ii): Appraising significant changes resulting from representations.
DPD Stage 4: Adoption and monitoring
SA stages and tasks
<ul style="list-style-type: none"> • D3: Making decisions and providing information.
<p>Stage E: Monitoring the significant effects of implementing the DPD</p> <ul style="list-style-type: none"> • E1: Finalising aims and methods for monitoring. • E2: Responding to adverse effects.

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- 3.4 The first stage of the SA process was the preparation of a Scoping Report. The outcome of the Scoping Report provided the building blocks upon which the SA process is built. The designated consultation bodies and other key stakeholders such as the Local Strategic Partnership were consulted with an initial Draft Scoping Report. Their comments were fully taken into account and the Draft was reviewed before the document was also published for full public consultation. The Sustainability Appraisal Framework that has been used to appraise the objectives and policies of the Draft Core Strategy is set out in the Scoping Report and has been refined to take account of all the representations received during these initial consultation processes.
- 3.5 The Scoping Report stage was effectively about evidence gathering. It dealt with the tasks established in stage 1 of the SA of DPD as established in the ODPM guidance. This involved:
- identification of other relevant policies, plans and programmes and sustainability objectives that has bearing on DPDs. For example, the SEA Directive requires environmental protection objectives established at international, European Community or national levels to be taken into account when preparing SA. It is expected that this information be kept under review throughout the SA process.
 - collection of baseline information of existing issues and challenges facing the DPDs, their underlying trends and their justification. This provides the basis for predicting and monitoring the effects of the DPD and how they could be dealt with.
 - identification of sustainability issues, indicators and problems. This provides the opportunity to define the key sustainability issues and objectives for the DPD to achieve. It is helpful for this to be linked to the baseline data.
 - developing the SA framework allows for consistency in the manner in which sustainability effects of the DPD are described.
 - consulting on the scope of the SA. Public consultation is a key part of the SA process. The SEA Directive establishes specific requirements for public consultation. In particular, local planning authorities are required to consult the public who are affected or likely to be affected, or have an interest in the Plan. There are various specific bodies that the Act requires to be consulted. They include the Environment Agency, the Natural England and English Heritage.
- 3.6 Most of the Scoping Report has been incorporated into this SA Report since it an essential and integral part of the SA process. However, full details of the Scoping Report can be found on the Council's website.

4 Review of relevant policies, plans, programmes and their Implication for Sustainability Appraisal and DPDs

- 4.1 One of the tests of soundness of the Core Strategy is its conformity with strategic guidance and objectives provided by international, national, regional and county policies, objectives, targets, plans and strategies etc. Similarly, the Core Strategy should reflect the unique aspirations and concerns of local people as expressed in local documents such as the Community Plan, Parish Plans etc. A comprehensive review of these plans and programmes and their implications for the sustainability appraisal and the Core Strategy is therefore of critical importance. In particular, it assists in having a clear picture of the objectives and targets that the Core Strategy and indeed other DPDs should aim to achieve.

- 4.2 A review of these documents is set out in Appendix 1 and it includes the relevant objectives and specific targets that they seek to achieve and their implications for the Core Strategy and other DPDs. They have been structured into national, regional and local documents. The list has been reviewed to include comments from key stakeholders and the public and will be continuously reviewed to ensure that it is up to date.
- 4.3 It needs to be stressed that the review of the list has informed the collection of baseline data, the processes and procedures that need to be taken into account in the preparation of both the SA and DPDs. Appendix 2 provides a range of relevant baseline data relating to the issues facing the District. Some key baseline data including the elements of Sustainable Development are set out in Section 6.1 of this report.

5. Collection of Baseline Information – Key Elements of Sustainable Development

- 5.1 One of the key starting points of the SA process is an identification of the elements of sustainable development, which have relevance to the residents and businesses of the District; in the way that they manage their activities now, and protect resources for future generations. In identifying these elements, an account is taken of the provisions of the SEA Directive and the plans, programmes and strategies and relevant baseline data set out in Appendices 1 and 2. This information is reviewed and updated on an ongoing basis.
- 5.2 It has also been necessary that a wide view of the environment is taken to encompass the global to the local. This includes the basic requirements for life – water, air, soils, etc. - other features that help maintain a balanced ecosystem, the naturally occurring but finite resources which provide energy and raw materials, the things that define culture, heritage and sense of place and those that define the amenity value of our daily lives.
- 5.3 In addition, the elements that define our quality of life, such as jobs and housing, and those that facilitate the social interaction of people are defined as part of this package.
- 5.4 Figure 3 sets out some elements of sustainable development drawn from national and other local documents. This has been used to inform the SA Framework.

Figure 3: Components of Sustainable Development

Key elements of Sustainable Development	Desirable Trends
Air	Reduce CO2 emissions, reduce gaseous and particulate pollutants.
Water	Effective management of the quantity and quality of water resources, reduce occurrence and severity of pollution, maintain wetland habitats, efficient use of water.
Non renewable fuels	Reduce rate of consumption.
Biodiversity	Maintain and enhance biodiversity.
Minerals	Reduce rate of use, maintain access to the stock for the future.

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Key elements of Sustainable Development	Desirable Trends
Soil	Maintain the productive quality of the soil.
Landscape	Maintain/enhance the quality and quantity of landscape and open space, increase the capacity of landscape and open space to absorb activity, increase the opportunity for equitable and benign access, and retain/enhance areas of tranquillity.
Historic Environment and Cultural Heritage (including heritage and archaeology)	Maintain/enhance valued places, artefacts and features, increase level of awareness and appreciation, protect, enhance and preserve archaeological sites.
Amenity	Increase level of satisfaction within the locality.
Energy conservation	Reduce the amount of energy resources consumed, improve efficient use of energy, promote use of renewable energy.
Design	Contribute to the character and quality of the local area, integrate with existing settlement.
Housing	Meet local housing needs and the specialist needs of specific sectors of the population.
Jobs	Improve employment opportunities, meet the needs of different sections of the local community.
Accessibility	Safe and effective means of access, provision of alternative means of access other than the car, improve accessibility in equitable manner.
Facilities	Increase availability of services in the locality.
Social inclusion	More integration, improved access to opportunities, environmental enhancement of relatively deprived areas.
Waste Reduction	More recycling, efficient use of resources.
Global warming	Less carbon dioxide emissions, efficient use of resources/energy.
Flood Risk	Minimisation of development in areas at risk of flooding.

5.5 Baseline information has been collected about the characteristics of the local area. This information is the bedrock for establishing issues of concern to the local community, establishing trends underpinning these issues and predicting and monitoring their effects. Baseline information needs to be up to date and iterative with an inbuilt mechanism for review. The information collected is focused on the aspect of sustainable development that needs addressing and is related to the issues to be tackled by the Core Strategy. Sufficient information will be required to answer the following questions throughout the assessment process:

- how good or bad is the current situation. Do trends show that things are getting better or worse?
- How far is the current situation from any established thresholds or targets;

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- Are particularly sensitive or important elements of the economy, physical, environment or community affected e.g. skills shortages, endangered species or rare habitats, and vulnerable social groups;
 - Are the problems reversible, permanent or temporary?
 - How difficult would it be to offset or remedy any damage?
 - Have there been significant cumulative or synergistic effects over time? Are there expected to be such effects in future?
- 5.6 A number of sources have been used to identify the baseline information. These are clearly set out against the data. An attempt has been made to align the baseline data to the issues to be addressed (see Appendix 2). While the District Council has made a significant effort to quantify most of the baseline information, not all the information lends itself to this form of assessment. Where this is the case, qualitative assessment will be made and, in certain circumstances, experts are providing supporting information.
- 5.7 Furthermore, there are other key sustainability issues that are of critical importance. These issues include areas of significantly degraded landscape/townscape or where, on current trends, there is likely to be further significant loss of landscape/townscape character or quality; and areas where development has had or is likely to have significant impact upon the historic landscape and of people's enjoyment of it.
- 5.8 The baseline data also presents a clear demonstration of the many opportunities that exist in the District. In particular, the high level of education of residents, opportunities for heritage-led economic activities, opportunities for sustainable reuse of historic buildings and scope for providing better access and understanding of the historic environment.

6. Summary of the Basic Characteristics of the District

- 6.1 Our District lies at the heart of England. The total population of the District is 115,500 (2001 Census). The town of Stratford-upon-Avon is the largest settlement with a population of only 23,000. There are also a number of important rural centres, including the market towns of Alcester, Shipston-on-Stour and Southam.
- 6.2 In all, there are about 250 communities of varying sizes spread across a predominately rural area covering 979 square kilometres. It is one of the largest districts in England making delivery of and access to services a major issue for residents.
- 6.3 Most of the District to the north of Stratford-upon-Avon lies within the West Midlands Green Belt. The Cotswolds Area of Outstanding Natural Beauty extends into the southern fringes of the District.
- 6.4 The general landscape character is one of rolling lowland countryside, much of it arable farmland. But within this general description are subtle variations. The northern part of the District is characterised by small fields of wooded Arden, which gives way to the more open and larger grazing fields of the Avon and Stour valleys towards the south. Further south are the steep scarp slopes of Edgehill and the downland of the Cotswold fringe. These differences provide the basis for identifying distinct landscape character areas within the District. This characterisation has an

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important impact on the way we look at design and landscaping issues in the District.

- 6.5 Because the District covers such an extensive area, various towns outside its boundaries have a strong influence over how different parts of the area function. Royal Leamington Spa, Banbury, Redditch and Solihull all have large shopping centres, provide a wide range of employment opportunities and support a variety of leisure facilities. Conversely, the pleasant countryside and cultural attractions of our District make it an appealing place for visitors from neighbouring areas as well as from further afield.
- 6.6 On the strategic transport front, while the M40 cuts across the District, there is only one full junction that lies within it, at Gaydon (Junction 12). In addition, junction 16 lies to the north of Henley-in-Arden, providing access for northbound traffic only. Junction 15 at Longbridge near Warwick lies just outside the District, about six miles north-east of Stratford-upon-Avon. The other strategic route is the A46(T) which crosses the District between Evesham and Warwick and forms the northern bypass to Stratford town.
- 6.7 As for intercity railways, the Chiltern Line between Birmingham and London Marylebone passes through the District. Although there are no stations on this section, Warwick Parkway, Leamington Spa and Banbury stations are relatively accessible. The only other railway in the District is the one that runs between Birmingham and Stratford-upon-Avon, known as the 'Shakespeare Line'. This line provides an important service to shoppers, tourists and students and has considerable scope for improvement. The Cotswolds Line to London Paddington runs close to the southern edge of the District, with a station at Moreton-in-Marsh.
- 6.8 Around 5.5 million people visit the District each year, with Stratford-upon-Avon and the Shakespeare properties being of international significance. Tourism is crucial to the local economy and is facing important challenges at the present time.
- 6.9 A significant factor is the higher average age of the District's population compared with the national average. Almost 50% of residents are over 45 and the proportion aged 85+ has increased by nearly half over the last ten years. This trend is likely to continue.
- 6.10 Property prices are extremely high and many people, especially the young and lower paid, cannot afford to live within or move into the District. This makes the provision of affordable housing a priority. The latest assessment indicates that the average cost of residential property in this District is about £272,000, 24% above the national average. Compounding this situation is the ratio between house prices and earnings. Comparing the lower quartile house prices with lower quartile earnings (a standard measure of affordability) shows that, in 2007, Stratford District experienced a ratio of 9.0, well above the England average of 7.3.
- 6.11 The District has experienced a considerable influx of migrant workers in recent years, particularly from Eastern Europe, providing an important source for filling low paid jobs in the tourism and horticulture sectors. While they have created an additional pressure on the private housing stock, this is not the case in relation to housing association properties.

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- 6.12 Unemployment levels fell consistently throughout the mid and late nineties although reduction has levelled off since 2001. In June 2008, the unemployment rate in Stratford District was only 1.0%, compared with 3.0% in the West Midlands region and 2.2% in the UK as a whole.
- 6.13 There is a considerable imbalance between the number of jobs in the District and its working population. This is a primary factor behind commuting patterns. Stratford District has experienced a higher increase of in-commuting than other parts of Warwickshire, rising from about 20% in 1981 to nearly 36% in 2001. In common with all parts of the county, there has also been an increase in out-commuting during the same period, from about 32% to just on 40%, again the highest in the county.
- 6.14 All this means that the District cannot be treated and planned in isolation; we have to understand and respond to such influences.
- 6.15 Figure 4 is a map of the District illustrating some of its key features and its relationship to neighbouring areas.

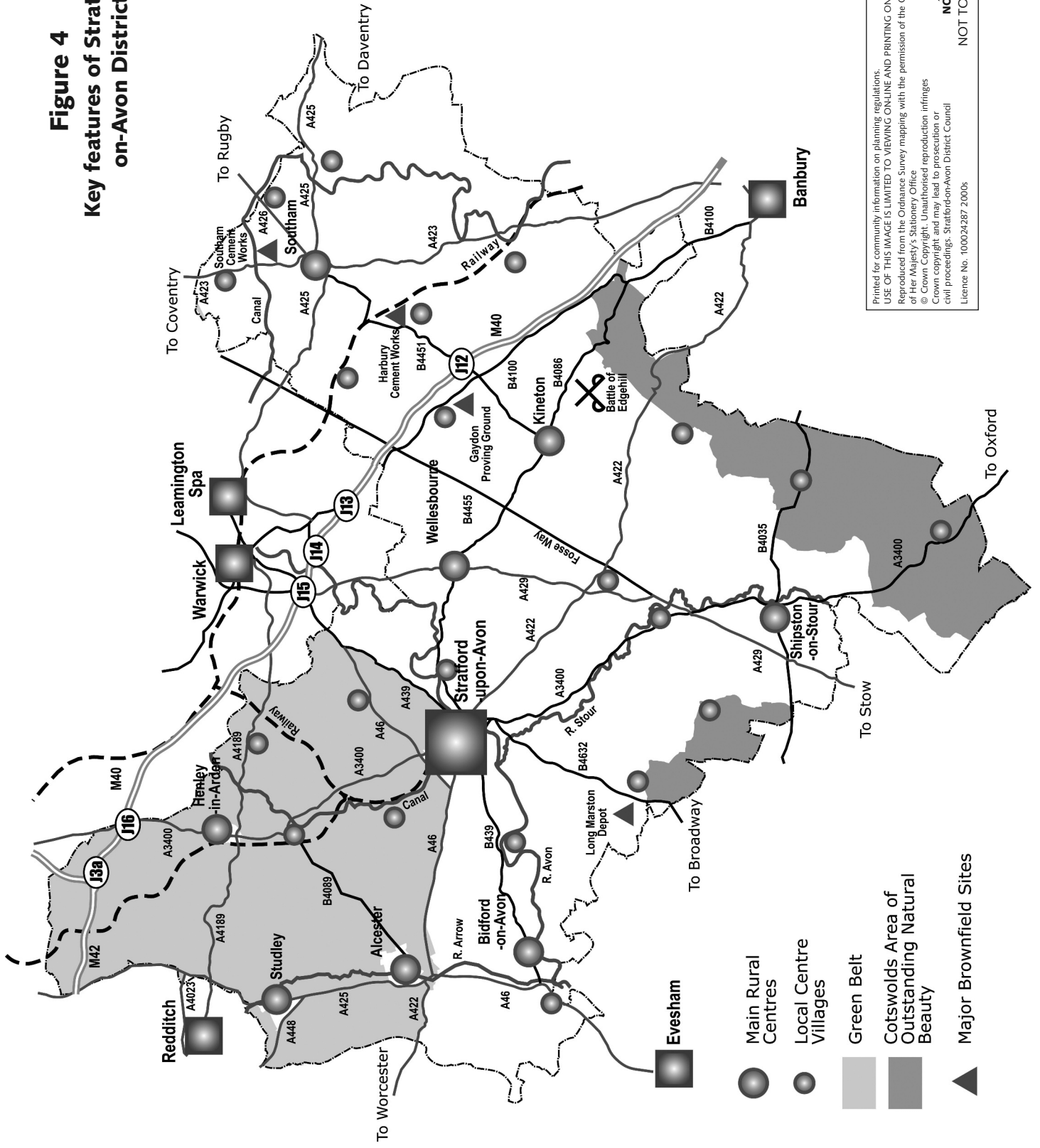
7. Challenges and Issues facing the District

- 7.1 The District faces a number of challenges which the Core Strategy should seek to address. These challenges have been compiled from various sources including the Community Plan for the District, public consultations, stakeholder workshops, citizen panels etc. Internal consultation with all the sections of the District Council, Councillors, and officers of the County Council and other partner organisations were also carried out to inform the definition of these challenges.
- 7.2 From these consultations an Issues & Options document was prepared identifying the key challenges. This formed the basis of a public consultation exercise. The Issues & Options document, together with the questions that were posed, is attached as Appendix 3.
- 7.3 It is important that these issues and challenges are adequately justified by a relevant and comprehensive evidence base. Appendix 2 sets out the baseline data relating to the specific challenges facing the District. Apart from the Core Strategy, other policies, strategies and plans identified to address any of these issues will also be subject to an SA process where relevant. A key test for the suitability of any proposal would be how well it meets the test of the SA Framework and contributes towards the goal of sustainable development.

8. Sustainability Appraisal Framework

- 8.1 The Sustainability Appraisal Framework is informed by the key elements of Sustainable Development established in Figure 3, a review of relevant plans and programmes in Appendix 1, a review of the challenges facing the District and the West Midlands Sustainable Development Framework. This Framework has had a significant influence in developing the approach taken for this District because it has been approved as a basis for this process across the region. This will ensure a consistent approach towards achieving regional planning and sustainability objectives. However, it needs to be emphasised that the SA Framework has been developed to reflect the unique circumstances of the District.

Figure 4
Key features of Stratford-on-Avon District



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- 8.2 The purpose of the SA Framework is to provide a consistent basis for describing, analysing and comparing the sustainability effects of the objectives, various policies and proposals of the Core Strategy. The SA Framework also comprises a set of objectives to be achieved by the provisions of the Core Strategy.
- 8.3 The manner in which the provisions of the Core Strategy contribute to achieving the objectives set out in the SA Framework is indicated by assigning the following symbols:
- + likely complementary relationship
 - 0 neutral relationship
 - potential conflicting relationship
- 8.4 Details of the Sustainability Appraisal Framework are set out in the following table.

Figure 5: Sustainability Appraisal Framework

THEME	OBJECTIVES
DEVELOPING THRIVING SUSTAINABLE COMMUNITIES	
Participation	Provide opportunities for communities to participate in and contribute to the decisions that affect their neighbourhoods and quality of life.
Crime	Reduce crime, fear of crime and antisocial behaviour.
Education	Provide facilities for lifelong learning and training for all sections of the community.
Health	Improve health and reduce health inequalities by encouraging and enabling healthy lifestyles as well as protecting health and providing health services.
Poverty	Tackle poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage.
Access	Promote and improve access to services and opportunity, including education and lifelong learning, leisure, employment, health; and ensure that access is equitable, regardless of location, income, lifestyle or background.
Culture & recreation	Improve opportunities to participate in the cultural and recreational activities that the District can offer.
Housing	Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs, in clean, safe and pleasant local environments.
Population	Balance the needs of local people and visitors, and establish the District as both a self-sufficient District for residents and a high quality place for visitors.
ENHANCE AND PROTECT THE ENVIRONMENT	
Historic Environment/Cultural Heritage	Enhance, preserve, protect and manage sites, features and areas of archaeological, historic and cultural heritage importance. Identify, assess and

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THEME	OBJECTIVES
	incorporate the physical, social, economic and environmental value of the historic environment into the regeneration of the District. Improve and broaden access to and understanding of local heritage, historic sites, areas and buildings.
Landscape	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place. Achieve high quality and sustainable design for buildings, spaces and the public realm, sensitive to the locality.
Environmental Assets	Value, enhance and protect the District's environmental assets, including the natural and built environment and environmental heritage.
Biodiversity	Value, restore, enhance and protect biodiversity.
Land use	Encourage development that optimises the use of previously developed land and buildings and creates high quality built environments incorporating high quality green space, design and encouraging biodiversity.
Urban Development	Encourage urban development that improves the quality of the urban environment as a whole in order to stem the unsustainable decentralisation of people, jobs and other activities away from urban areas.
Stewardship	Encourage local stewardship of local environments.
Pollution	Minimise air, water and soil pollution level.
Climate change	Minimise the District's contribution to the causes of climate change while implementing a managed response to its unavoidable impacts.
ENSURE PRUDENT AND EFFICIENT USE OF NATURAL RESOURCES	
Energy	Reduce overall energy use through increasing energy efficiency, and increase the proportion of energy generated from renewable sources.
Conservation	Conserve use of natural resources such as water and minerals.
Standards	Promote and ensure high standards of sustainable resource-efficient design, construction and maintenance of buildings.
Planning	Ensure the location of development makes efficient use of existing physical infrastructure and helps reduce need to travel, especially by private car, allocate land for development in sustainable locations, and enhance the character of the District.
Transport	Encourage modal shift away from private car use and reduce the production of pollutants and congestion from transport while creating good accessibility for all people in the District.
Waste	Encourage and enable waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream.

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THEME	OBJECTIVES
Local Sourcing	Encourage local sourcing of goods and materials, and rural economic growth.
DEVELOPING A FLOURISHING, DIVERSE AND STABLE ECONOMY	
Growth	Achieve sustainable economic growth and prosperity for the benefit of all the District's inhabitants.
Employment	Create high quality employment opportunities suited to the changing needs of the local workforce, whilst recognising the value and contribution of unpaid work.
Investment	Promote investment in future prosperity.
Skills	Encourage ongoing investment and engagement in learning and skills development.
Innovation	Encourage a culture of enterprise and innovation.
Technology	Promote and support the development of new technologies, especially those with high value and low impact.
Responsibility	Encourage corporate social and environmental responsibility, with local organisations and agencies leading by example.
Tourism	Enhance the visitor experience and ensure Stratford in particular and the District as a whole establishes itself as a World Class place for tourists.
Consistency with national policy	Assist in achieving national policy objectives.
Consistency with regional policy	Assist in achieving the objectives of the Regional Spatial Strategy.
Consistency with Community Plan/ Corporate Strategy	Assist in achieving local community priorities and the corporate strategy of Stratford-on-Avon District Council.

9. Overall Approach to the Sustainability Appraisal of Objectives, Policies and Proposals

- 9.1 The Core Strategy follows a distinct structure – an overall vision, a set of Core objectives and a range of policies and proposals. The importance of establishing a clear relationship between these constituent parts so that the Core Strategy presents a cohesive and consistent overall approach is essential. The Sustainability Appraisal emphasises the relationships between the objectives and policies by establishing how well or not they complement or conflict with each other.
- 9.2 The SA Framework sets out the list of indicators by which constituent parts of the Core Strategy are measured with the view to improve upon its ability to meet the overall goal of contributing to the UK Sustainable Development Strategy.
- 9.3 The Appraisal uses matrices to:
- review the objectives of the Core Strategy and how they support each other;
 - appraise the compatibility of the objectives against the Sustainability Appraisal Framework;

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- assess how the policies of the Core Strategy seek to achieve its objectives; and
- appraise the policies against the Sustainability Appraisal Framework.

9.4 A commentary on the individual components of all these assessments is given, along with the overall outcome and its contribution towards sustainable development. Conclusions on the outcome of this process are also set out.

9.5 The Sustainability Appraisal of the Core Strategy has been done in two stages. The first has been an SA of alternative options to inform the selection of preferred policy options and the spatial distribution of development. The second comprises this SA Report and it specifically concentrates on the appraisal of the preferred policies of the Draft Core Strategy. This second stage appraisal is important because not all of the policies had distinct set of alternative options to appraise. Furthermore, it demonstrates how well the policies will deliver the objectives of the Core Strategy and contribute towards the goal of sustainable development.

10. Sustainability Appraisal of alternative options

10.1 An Issues and Options document was published for public consultation in May 2007. A series of consultation exercises were carried out to establish the issues and challenges facing the District. This process is clearly set out under the consultation statement in Section 17 below and it is therefore not intended to repeat them under this section.

10.2 A number of questions were asked to explore alternative ways of addressing the issues and challenges facing the District. Representations that were received as a result of this consultation, and other sources of information, were used to inform the identification of alternative policy options for appraisal. It needs to be emphasised that whilst many of the policy areas have distinct alternatives that are appraised, there are a number of policy areas where for various reasons no distinct alternatives could be identified for appraisal.

10.3 A thorough assessment of the options was carried out to gauge their impact on the elements of the Sustainability Appraisal Framework. The outcome of this process was a key source of evidence to inform the identification of the preferred policy approach. For each policy of the Draft Core Strategy is a summary of the outcome of the appraisal of the alternative options and why a preferred option was chosen. Full details of the appraisal of options is a background technical document that can be inspected and/or be obtained by request from the District Council Offices or by contacting Planning Services on 01789 260337. It can also be viewed on the Council's website as part of the background documents to the Core Strategy.

11. Sustainability Appraisal of objectives of the Draft Core Strategy and analysis

11.1 The objectives of the Core Strategy provide a sense of focus for the policies and proposals by setting out its purpose and aspirations. The Core Strategy identifies 13 objectives. A full list of the objectives is in Appendix 4. The objectives reflect the issues and challenges that the District faces and which impact on its residents, businesses and visitors. A key reason for appraising the objectives is to ensure that no single objective is

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substantially undermined or compromised in order to achieve another objective. Secondly, the extent to which the objectives assist in meeting the overall goal of sustainable development is critical in determining the performance of the Core Strategy.

- 11.2 It is important to appreciate that each objective has an optimum level of achievement in its own right but that there is likely to be trade-off required when applying them to individual circumstances.
- 11.3 Appendix 5 provides details of the appraisal of objectives.
- 11.4 The Objectives Compatibility Matrix reveals that in the majority of cases they are mutually supportive of each other and it is unlikely that the pursuit to achieve one will seriously undermine any of the others.
- 11.5 There is however conflict between some of the objectives. The objectives of spreading development to meet local need where they arise, and extending the benefits of tourism to the rest of the District beyond Stratford-upon-Avon may result in increased car travel making a negative contribution to the environment, and could impact on the character of the countryside. The objectives regarding development to meet needs for employment and housing have the potential to threaten objectives to protect natural and historic features, protect the character of the countryside and minimise impact environmental impact. This highlights the need for the pursuit of these objectives to be underpinned by strong policies and actions to:
- encourage the use of walking, cycling and public transport in rural areas;
 - support rural development with adequate infrastructure and community facilities as a means of reducing the need to travel, distances travelled, pollution and volume of traffic;
 - require all development to protect and enhance natural and historic features; and
 - ensure that development in the countryside is justified and would not harm the character of the area.
- 11.6 The policies of the Draft Core Strategy have been refined to take account of this.
- 11.7 There is also a potential conflict between the objectives to enhance the commercial centre of Stratford-upon-Avon and to bolster the roles of the through the development of a settlement hierarchy in the Draft Core Strategy which sets out the complementary roles of the commercial and service centres across the district, and through a requirement in the retail policy to apply a sequential test to the location of retail and other town centre uses.
- 11.8 An assessment has also been carried out of how well the objectives in the Draft Core Strategy help to deliver the sustainability objectives for the District by measuring them against the elements of the Sustainability Appraisal Framework. The majority of the objectives when delivered will have significant positive impacts on the sustainable development of the

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District. There is not a single objective that is not positively linked to an element of the SA Framework.

- 11.9 There are, however, a few instances where tensions exist between the objectives and the elements of the SA Framework. As above, this relates mainly to how well to reconcile the need to meet local needs where they arise and the potential for increased car travel in the rural parts of the District. The same suggested mitigation to improve public transport applies. Furthermore, the objectives to provide necessary housing and employment for local residents could potentially have negative impacts on energy consumption, use of natural resources, etc. Strong energy supply and efficiency measures, strict standards of good design and environmental management are some of the necessary mitigation measures in this regard. For example, Policies CS.28 and CS.29 has been developed to facilitate mitigation of these impacts. The Council also has adopted SPDs such as Sustainable Low Carbon Buildings and guidance on green travel, etc. which sets out strict standards for the use of renewable energy in buildings and the management of the travel needs of employees respectively.
- 11.10 It is worth noting that many of the objectives have neutral implications on the elements of the SA Framework. Full details of the objective/SA Framework compatibility matrix are included in Appendix 5.

12. Sustainability Appraisal of the policies of the Draft Core Strategy

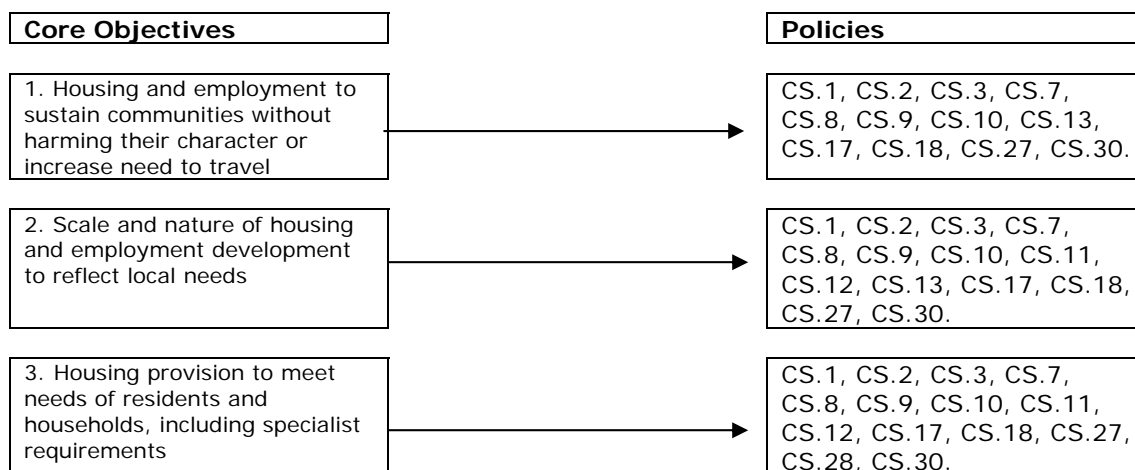
- 12.1 The Core Strategy contains 30 strategic policies to deal with the key challenges and issues facing the District. The SA has been carried out as an integral part of the Core Strategy process to inform the development of the policies. Many of the draft policies are founded on the outcome of an assessment of a number of options against the elements of the SA Framework. The preferred approach to an individual policy is a demonstration of how well it performs against the sustainability criteria compared with alternatives approaches. In this regard, the emphasis of these policies has been influenced significantly by the SA process.
- 12.2 Two sets of policy appraisals have been carried out. The first is how well the policies complement the delivery of the objectives of the Core Strategy. The second appraisal assesses the policies against their likely effect on the elements of the Sustainability Appraisal Framework. What these appraisals help to achieve is to further an understanding of whether the policies will be assisting in addressing the challenges facing the District in the form of the established objectives and also whether they will help in achieving the overall goal of sustainable development. Where there are conflicts, the assessment identifies whether the Core Strategy as a whole allows scope for effective and robust mitigation measures to be introduced and/or applied.
- 12.3 Overall, each policy has a strong linkage with an objective and a key role to play in delivering these objectives. There are however a significant number of policies with neutral links to the objectives. The analysis also shows that there are a number of policies whose application might conflict with the achievement of specific objectives of the Core Strategy. There is a logical trend apparent in the manner in which these conflicts arise. For example, policies that seek to promote development such as housing and employment to meet local need across the District often conflicts with the objectives of minimising pollution, energy use, climate change and

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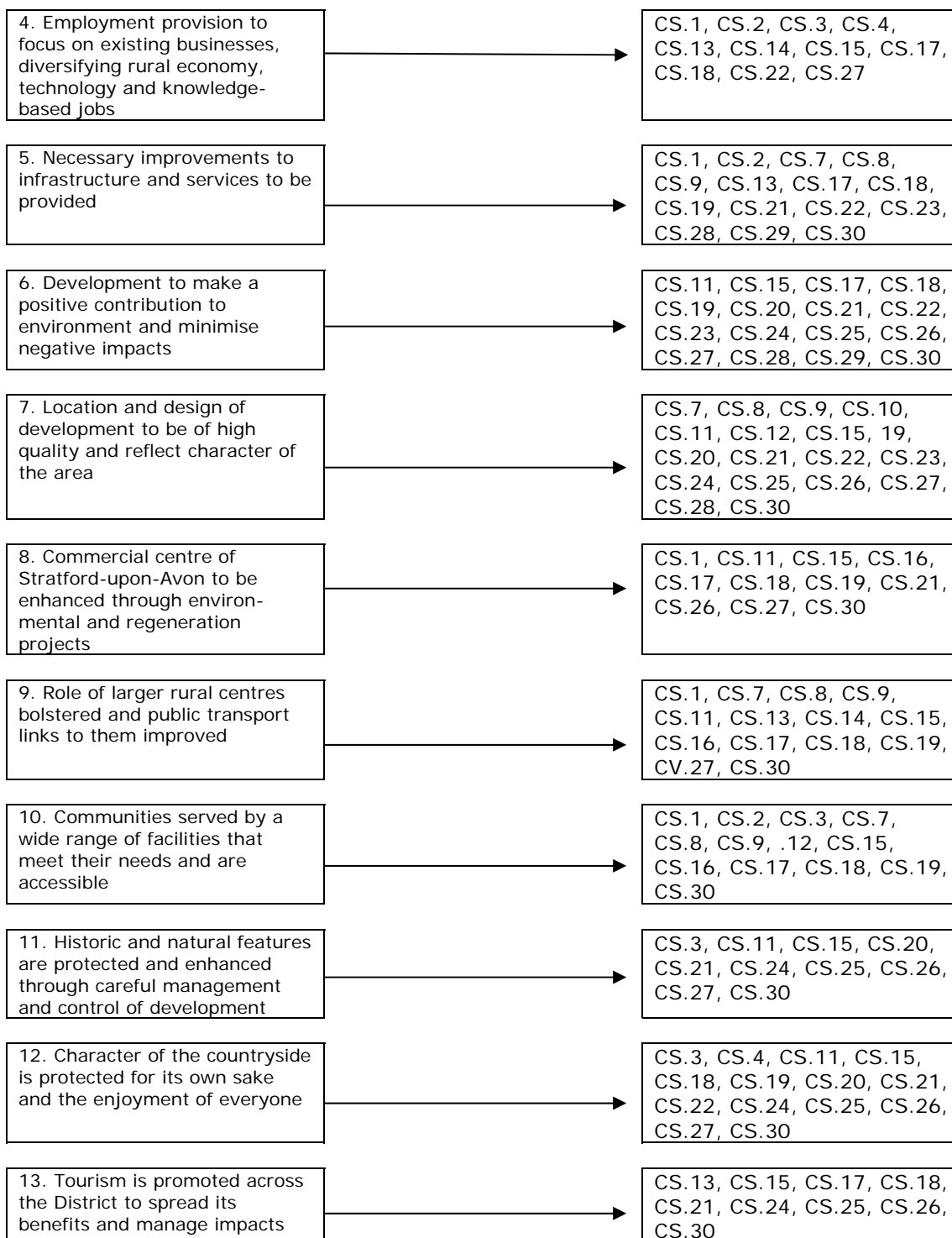
protecting the countryside. The potential for increased car travel in rural parts of the District associated with rural development has been an influential sustainability factor. Similarly, the policy of encouraging the use of renewable energy could have the potential to result in development which does not reflect the character of the area, and could damage the character of the essential rurality of the District.

- 12.4 It needs to be emphasised that policies to promote development have significant benefits to communities and indeed have positive impacts on many of the other aspects of the sustainability criteria.
- 12.5 The policies of the Core Strategy should be read in a comprehensive and coherent manner to appreciate how potential conflicts are often resolved by other policies. This is due to the approach adopted in developing the policies, in particular making the SA an integral part of the Core Strategy preparation process. For example, policies are included in the Core Strategy requiring consideration of landscape character and visual amenity as essential material considerations when determining the suitability of development schemes. Similarly, there are policies to promote public transport to minimise the need to travel by car. Other policies are in the Core Strategy to ensure that development does not leave behind unacceptable pollution levels that cannot be mitigated. The need for the Core Strategy to secure adequate infrastructure to support development is clearly expressed. Other policies to promote facilities and services to serve residents and visitors to the District are all mitigation policies to minimise the impacts of development and to support communities.
- 12.6 Apart from the above examples of mitigation measures identified within the Core Strategy itself, it is emphasised in Section 15 of this report that the Core Strategy does not sit in isolation. It is part of a number of Council plans and strategies designed to assist in achieving its objective of sustainable development. A clear relationship of how this is achieved is set out in Figure 7. Full details of the appraisal of policies against the objectives are presented in a matrix form and are included in Appendix 5. The manner in which the policies help deliver the objectives of the Core Strategy is presented in Figure 6 below.

Figure 6: Positive Relationship between the objectives and policies of the Core Strategy



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12.7 A Sustainability Appraisal Framework with a clear set of elements and objectives has been established to assess how well the policies assist in achieving sustainable development in the District. The elements of the SA Framework are comprehensive and take on board the wider definition of the environment together with relevant socio-economic factors. Each policy has been measured against the SA Framework to assess the likely consequences of pursuing them.

12.8 The appraisal has revealed that most of the policies will have positive impacts on sustainable development. For example, policies such as those to resist development in the countryside, other than that which is

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consistent with other planning policies, and those relating to Green Belt, managing existing housing stock, tackling congestion, promoting services and recreational facilities, do not conflict with any of the elements of the SA Framework.

- 12.9 As with the appraisal of policies against the objectives, this appraisal has also revealed that there are a number of policies that conflict rather than support the delivery of the objectives of the SA Framework. For example, the policy to promote the use of renewable energy raises concern that it could have negative impacts on landscape character and biodiversity. The policy itself has an inbuilt mechanism to minimise such impacts. Similarly policies to promote development show a clear conflict with objectives to minimise pollution, improve landscape and townscape, reduce climate change and improve biodiversity.
- 12.10 To deal with this situation, there are a number of other policies designed to address these conflicts and concerns. Many of these mitigation-type policies are similar to what has already been stated above. Details of the appraisal of the policies against the SA Framework are in Appendix 5.
- 12.11 The nature and extent of detailed specific measures that could be introduced at the planning application stage will depend on the actual impacts of specific proposals.
- 12.12 Apart from the appraisal of the policies, it needs to be emphasised that the performance of the policies of the Core Strategy also relies on how well they are phrased with regard to clarity and intent in their meaning and precision. The tests to be met in the Council's view are that a policy should:
- be clear about its requirements
 - be written in a simple language that is understandable to its users
 - be focused and avoid trivial matters
 - be concise and unambiguous, and
 - conform to all strategic guidance.
- 12.13 It is the Council's view that the policies of the Core Strategy meet the above tests.

13. Sustainability Appraisal of Proposed Development Opportunities

- 13.1 At the Issues and Options stage a number of options for the spatial distribution of development were consulted upon. These options were:
- concentration of development in and on the edge of Stratford-upon-Avon
 - concentration of development in and on the edge of the larger rural towns and villages
 - spread development around most towns and villages throughout the District
 - focus development in the form of a new settlement or as a major expansion of an existing settlement
 - locate development along main public transport routes (existing or potential), and
 - focus development on large brownfield sites in the countryside.
- 13.2 The options were appraised to assess how well they perform against the Sustainability Appraisal Framework. It needs to be emphasised that the

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outcome of the consultation of the issues and options stage was a material factor in this assessment. Details of this appraisal is included as part of the appraisal of options document which forms a background technical document to the SA and Core Strategy. The preferred approach was to focus most new development on the main town of Stratford-upon-Avon and the Main Rural Centres of Alcester, Bidford-on-Avon, Henley-in-Arden, Kineton, Shipston-on-Stour, Southam, Studley and Wellesbourne, but also to allow scope to bring forwards schemes that are specifically designed to meet the identified local needs of smaller settlements.

- 13.3 The identified larger centres have a wide range of services, facilities and jobs to support further growth and relatively better public transport infrastructure to minimise the need to travel by car. This approach is consistent with both national and regional strategic guidance. Its implementation will be complemented by greater emphasis in the utilisation of previously developed land, increased densities, good design principles and maximisation of energy efficiency of buildings.
- 13.4 At the heart of the preferred approach lies the principle of sustainable development. In particular, it seeks to focus most development in the main centres where public transport infrastructure is available and to support small-scale development in villages to help sustain facilities and service, in order to minimise the need to travel overall. It also recognises that uncontrolled rural development could exacerbate the need to travel by car and detract from the rural character of the District.
- 13.5 The emphasis on promoting the role of the Main Rural Centres to serve their rural hinterlands is to provide jobs and services to smaller communities nearby, thereby reducing overall distances travelled and helping to ensure that basic facilities and service are accessible to all sections of the community, and reducing social exclusion. Furthermore, the overall impacts on air pollution and the conservation of energy will be positive.
- 13.6 The strategy targets rural development to that which is specifically designed to meet an identified local community need. This approach is essential in a rural district such as Stratford-on-Avon where local amenity is most people's immediate connection with the natural environment. This can be threatened if rural development is uncontrolled. The approach taken will minimise any such potential impact.
- 13.7 The identification of specific sites for development in the Core Strategy is done in the context of this overall spatial development strategy, and in this regard, no purpose would be served by repeating the process of appraising individual sites against the Sustainability Appraisal Framework. It is envisaged that if this process was to be carried out, it would result in similar outcomes. Where it is relevant, detailed Environmental Impact Assessment will be required as part of development proposals to assess specific impacts of proposals and to introduce appropriate mitigation measures.
- 13.8 Having said that, a thorough set of criteria has been applied to the selection of sites for housing development through a Strategic Housing Land Availability Assessment (SHLAA). A copy of the SHLAA is part of the evidence base for the Core Strategy and can be found on the Council's website, on the Local Development Framework page. The SHLAA

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establishes the following criteria for identifying the broad locations for housing development:

- Whether the site is suitable for development – issues such as site history, policy constraints, potential physical limitations, flood risk, contamination and infrastructure provision are considered.
- Whether the site is available for housing development – this has meant that the owners/or developers are identified and their intentions clarified as to whether the sites will be available for development. Where this is not possible to identify, a view is taken of the likelihood of the site coming forward for development.
- Whether development is achievable – in this case whether development of the site will be economically viable.
- Whether any constraints can be overcome – where such constraints form a significant barrier to implementation that cannot be reasonably overcome, the site has been rejected.

13.9 A schedule of the development opportunities is in Appendix B in the Draft Core Strategy.

13.10 On the basis of the above assessment, there is clear evidence to support the case that the overall approach to the spatial distribution of development and the selection of individual sites will have a positive impact on the various elements of the Sustainability Appraisal Framework and contribute significantly towards the overall goal of the Core Strategy which is to achieve sustainable forms of development in the District.

14. Assessment of Cumulative Impacts

14.1 Individual policies have been appraised against a number of criteria. This has highlighted some conflicts/negative impacts as well as a significant number of positive effects. Some of these on their own will not have significant adverse or positive impacts but collectively could add up to more significant effects.

14.2 What the above analysis has demonstrated is that most of the conflicts can be mitigated by other policies of the Core Strategy and indeed other strategies of the Council. It is therefore important that a comprehensive approach to considering the policies of the Core Strategy is taking to appreciate the balance that has been achieved by making the SA an integral part of the Core Strategy process.

15. Linkages with other strategies of the District Council

15.1 The Core Strategy does not sit in isolation from other strategies and activities of the Council. In delivering its objectives, it has strong links to a range of other strategies that are all commonly seeking to achieve sustainable development within the District and the aspirations of the Community Plan. A review of these other strategies demonstrates a great degree of synergy between them and with the objectives of the SA Framework.

- Cultural Strategy
- Crime and Disorder Reduction Strategy
- Health Improvement Plan
- Home Energy Conservation Act Strategy
- Housing Strategy

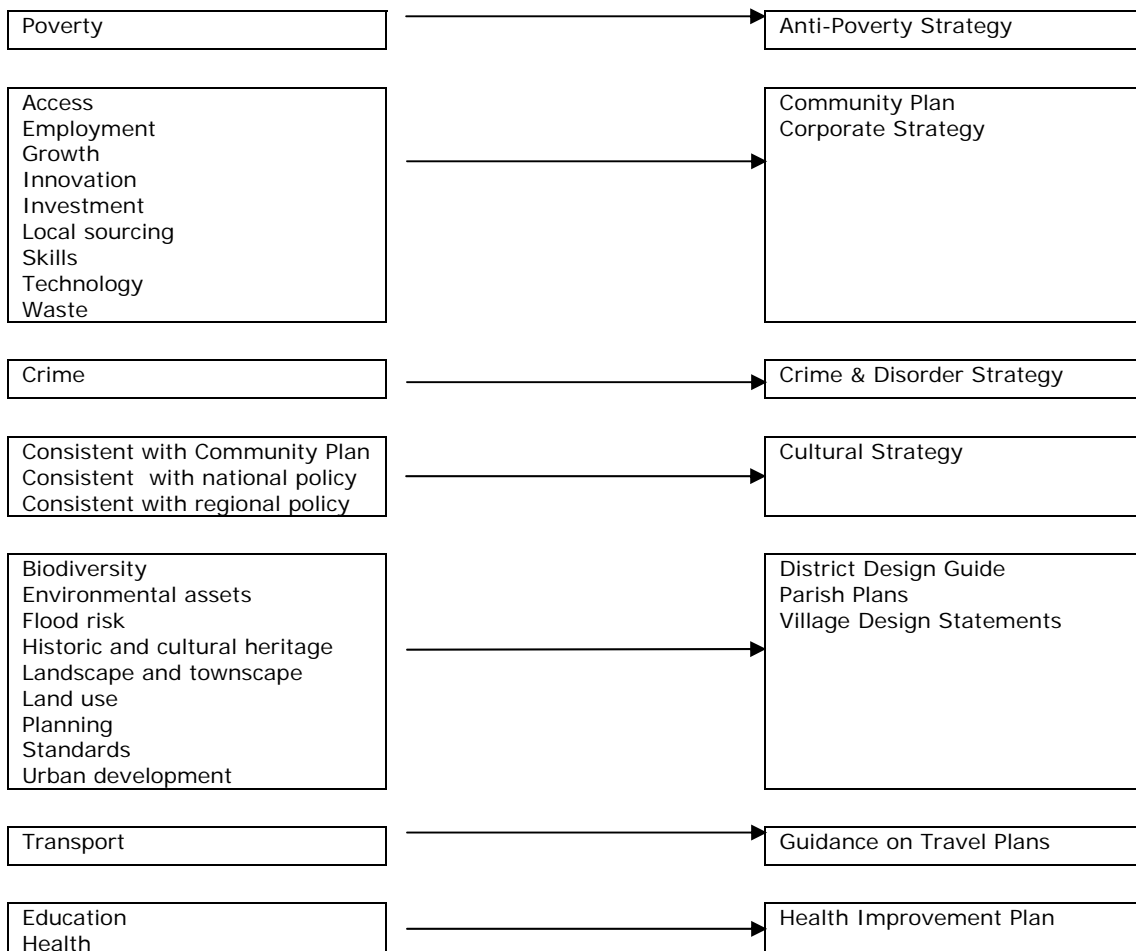
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- Leisure and Recreation Strategy
- Rural Strategy
- Tourism Strategy
- District Design Guide
- Anti-Poverty Strategy
- Parish Plans and Village Design Statement
- Guidance on Travel Plans.

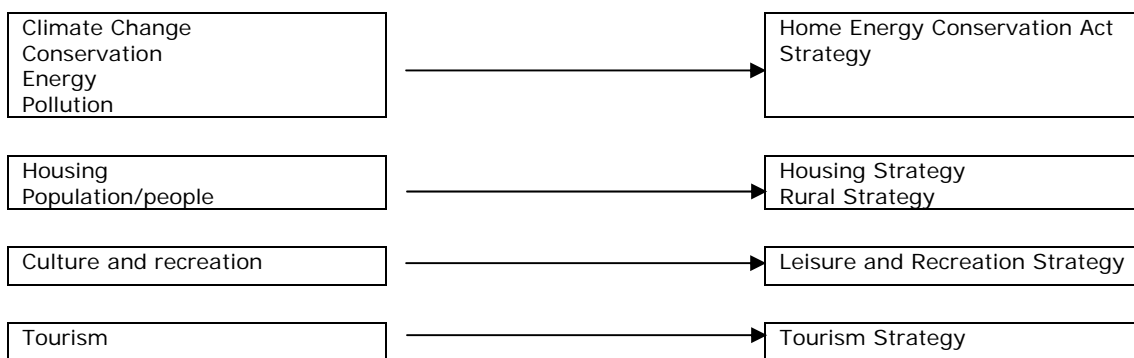
15.2 Some of the conflicts identified in the appraisal of objectives and policies can also be further mitigated by actions identified in these other strategies. For example, the potential conflict that has been identified between the objective of spreading the benefits of tourism to the rest of the District other than Stratford-upon-Avon and the need to reduce car use can be mitigated by the Council's strategy of securing Travel Plans as part of development proposals. The same can be said of the policy to support rural diversification and the need for Travel Plans to minimise car use in rural areas.

15.3 Figure 7 below demonstrates how the above strategies relate to the elements of the Sustainability Appraisal Framework.

Figure 7: Relationship between SA Framework and Other Council Strategies



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16. Monitoring the effects of the Core Strategy

16.1 Monitoring the outcomes is an essential part of the development process. The Core Strategy sets out clear objective to address the challenges facing the District. How well the policies are delivering these objectives will be carefully analysed. A framework setting out how the effects of policies will be monitored is set out in Figure 8 below. This will be the subject of further development and refinement in order to provide a consistent approach to assessing the effectiveness and impacts of policies.

16.2 The outcome of the monitoring process will be reported in the Council's Annual Report that will be produced on a yearly basis in accordance with the Planning and Compulsory Purchase Act 2004. This will be based on the period 1 April to 31 March and be submitted to the Secretary of State at the end of the calendar year.

Figure 8: Interim Monitoring Framework

Policy	Indicator
CS.1	%age of housing and employment-related applications approved in Stratford-upon-Avon and the Main Rural centres. %age of housing and employment-related applications approved in the rest of the District.
CS.2	Number of housing schemes approved to meet the specific needs of local communities.
CS.3	N/A
CS.4	N/A
CS.5	Number of planning application approved on sites listed under policy.
CS.6	N/A
CS.7	Number of dwellings completed against the housing trajectory.
CS.8	Number of affordable dwellings completed.
CS.9	Number of extra care units completed.
CS.10	%age of 2-3 bedroom dwellings completed.
CS.11	N/A
CS.12	Net additional pitches provided.
CS.13	Total amount of additional employment floorspace completed.
CS.14	N/A
CS.15	N/A
CS.16	Total amount of retail floorspace completed. %age of vacant retail units in Stratford-upon-Avon town centres and Main Rural

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	Centres.
CS.17	N/A
CS.18	N/A
CS.19	N/A
CS.20	%age of housing development on previously developed land.
CS.21	N/A
CS.22	Number of standalone renewable energy schemes approved.
CS.23	N/A
CS.24	Number of SINC designations
CS.25	N/A
CS.26	Number of Conservation Area Reviews completed
CS.27	N/A
CS.28	Amount of development granted planning permission which incorporates renewable energy production equipment to reduce overall predicted carbon dioxide emissions by at least 10%.
CS.29	Air Quality Management Areas designated. Number of Travel Plans approved as part of planning applications.
CS.30	Amount of developer contributions secured by type of development.

16.3 It should be stressed that there are other indicators which are monitored as part of the Council's corporate processes. These lie outside the Core Strategy process but are interlinked by way of the objectives they seek to achieve. An example of this is the amount of waste recycled in the District.

17. Consultation on the Sustainability Appraisal

17.1 An important and integral part of the SA process has been public and stakeholder consultations. Both the Planning and Compulsory Purchase Act and the SEA Directive require a comprehensive public consultation of SA and SEA. The Directive also requires responses to public consultation to be fully taken into account before the SA is finalised. It is also a requirement that certain designated consultation bodies in the UK are consulted. This includes – English Heritage, Natural England and the Environment Agency. This consultation exercise and others before it have been designed to meet all of these requirements.

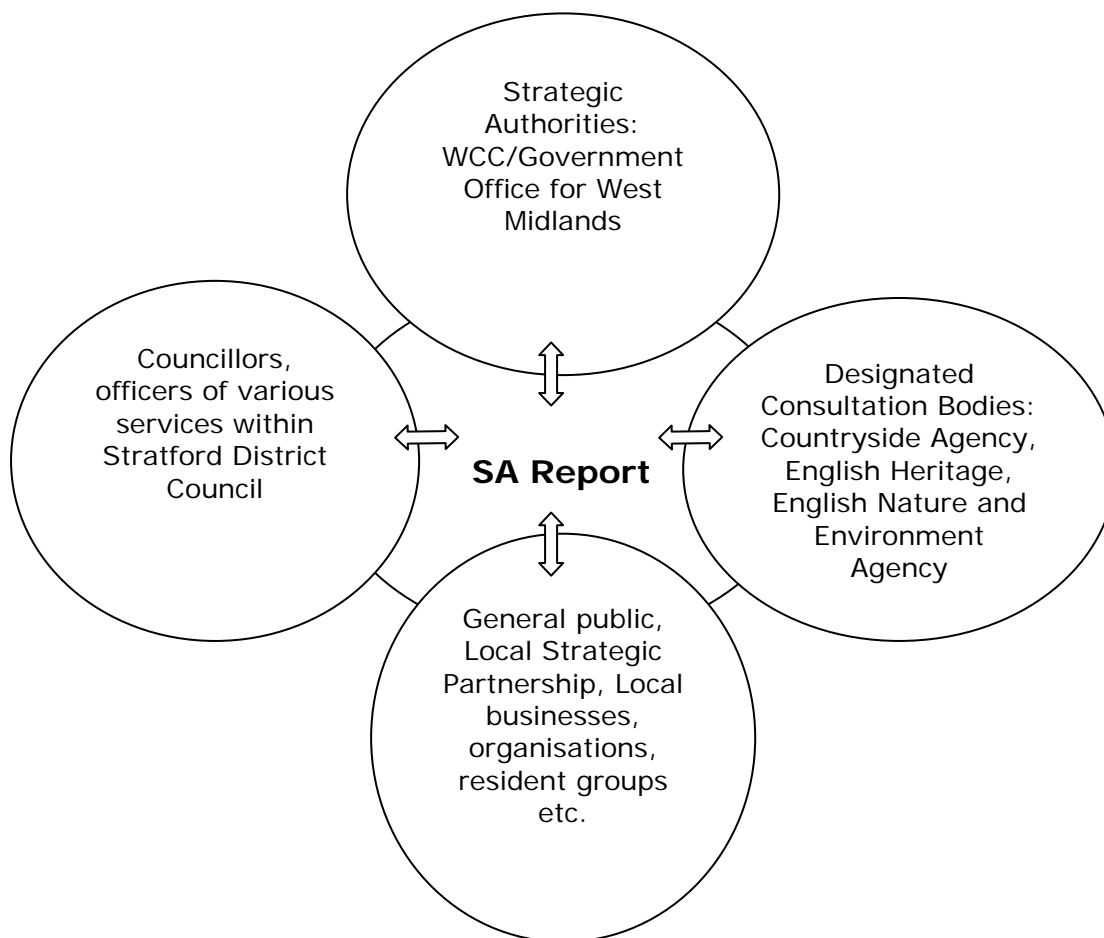
17.2 It is a fundamental philosophy of the District Council's approach to consultation to engage all relevant sections of the community at the very early stages of the Local Development Framework process before important decisions are made. In this regard, the designated consultation bodies and other relevant local and regional organisations such as the Local Strategic Partnership were consulted between April and May 2007 on an initial first Draft Scoping Report seeking their views on the following:

- whether there are other relevant plans, programmes, strategies that need to be taken into account in defining the sustainability issues and framework;
- whether the list of sustainability issues are covered adequately;
- whether the appraisal framework is comprehensive enough to form the basis of the sustainability appraisal;
- whether the approach adopted would meet the provisions of both the SEA Directive and the Planning and Compulsory Purchase Act;
- whether there are additional sources of data that would further help inform the process.

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- 17.3 Comments from the consultation responses were taken into account and the Draft was modified accordingly before it was published for full public consultation.
- 17.4 The general public was given a period of six weeks in May and June 2007 to comment on the Draft Scoping Report. As part of the Local Development Framework, the Council has an adopted Statement of Community Involvement (SCI), which was published in April 2006. A copy of the document can be found on the Council's website – www.stratford.gov.uk. The document defines the Council's approach to consultation in the District. The SCI had already gone through an extensive public consultation in its own right and been scrutinised by an independent Inspector appointed by the Secretary of State at a public inquiry before it was adopted.
- 17.5 The aim of the SCI is to allow local people, including local groups and organisations, the opportunity to be fully and effectively involved in influencing the contents of Development Plan Documents and the decision-making process regarding future development. It sets out clearly the manner in which the District Council intends to achieve this and it was concerned to ensure that the provisions of the SCI were followed in the preparation of the Scoping Report and the subsequent stages of the SA process.
- 17.6 Furthermore, there has been an extensive internal consultation with officers of various services in the District Council and councillors, whose involvement has been crucial in identifying the issues and challenges facing the District. Various workshops were organised with relevant officers of the District Council, County Council and other agencies. One of the purposes of the workshops was to help determine what the local and sustainability issues are and how they could be addressed in the LDF process.
- 17.7 It is also important to note that most of the sources from which baseline information had been collected have themselves undergone extensive public consultation exercises before they were adopted.
- 17.8 The consultation process for the preparation of the SA has been a continuous one with an inbuilt feedback mechanism for monitoring and review at each stage of the process. Consultation responses are carefully considered and taken into account at each stage of the process.
- 17.9 In all cases, the public has and will be adequately informed about the consultation exercises through the media, libraries, local offices of the Council and direct mailing. The District Council's response to any representations received will be published. A report on the consultation process will be published as part of the Core Strategy submission for public examination.
- 17.10 Figure 9 provides an illustration of the consultation process underpinning the preparation of this SA.

Figure 9: Diagrammatic representation of the consultation exercise



18. Next Stages in the Sustainability Appraisal process

- 18.1 An independent consultant will be commissioned to assess the objectivity of the Appraisal and to check whether the quality assurance checklist provided in Appendix 4 of the Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (November 2005) has been fully met. The comments from the consultants will be taken into account before the SA report is published as an integral part of the Core Strategy submission for public examination.
- 18.2 Any changes recommended by the Inspector will be incorporated into the document before it is adopted and published by the District Council. The implications and impacts of the SA will be assessed as part of the monitoring process of the Core Strategy.

19. Conclusion

- 19.1 The SA Report has been prepared to comply with both the SEA Directive and the requirements of the Planning and Compulsory Purchase Act 2004. It also meets the provisions of PPS12. The Appraisal has been carried out in-house but will be verified by an independent consultant to check its objectivity.

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- 19.2 It addresses all the tasks set out in the Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (ODPM, November 2005). The SA has been prepared as an integral part of the Core Strategy preparation process and its outcome has been used to influence and refine the policies of the Core Strategy. In particular, it has been used to assess the sustainability merits of various policy options before preferred options were identified.
- 19.3 The SA process has been iterative in its approach. It is believed that the process and its outcome has assisted significantly in striking an appropriate balance between the social, economic and environmental objectives of the Core Strategy, thereby assisting it to achieve its fundamental objective of promoting sustainable development.
- 19.4 Overall, the Core Strategy addresses contemporary challenges facing the District as well as looking into the future up until 2026. The objectives adequately cover the aspirations and challenges that were confirmed through extensive public consultation and have community support. The Appraisal clearly demonstrates that there are no significant tensions between the objectives and the pursuit of one objective would not undermine the delivery of the remainder. The few conflicts that exist between some of the objectives can be mitigated through the application of the policies to deliver them. Furthermore, most of the objectives have a strong measure of consistency with the elements of the Sustainability Appraisal Framework.
- 19.5 The policies have been demonstrated to have strong positive links to the objectives of the Core Strategy. Where there are conflicts, the manner in which they will be mitigated has been identified.
- 19.6 It has been demonstrated that the locational strategy adopted for the spatial distribution of development opportunities will have an overall positive impact on the SA Framework.
- 19.7 Overall, it is considered that the Core Strategy will make a positive contribution towards achieving sustainable locations and forms of development in the District.



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