



# **STRATFORD-ON-AVON SITE ALLOCATIONS PLAN (SAP): Revised Scoping Regulation 18**

**Sustainability Appraisal (SA) Report  
incorporating  
Strategic Environmental Assessment (SEA)  
NON-TECHNICAL SUMMARY**

**December 2017**

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# Stratford-on-Avon Site Allocations Plan (SAP): Revised Scoping Regulation 18 Consultation

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

Sustainability Appraisal Report  
NON-TECHNICAL SUMMARY

December 2017

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### Non Technical Summary of the Sustainability Report

1. This is the Non-Technical Summary (NTS) of the Initial Sustainability Appraisal Report documenting the processes of Sustainability Appraisal (SA) for the Stratford-on-Avon Site Allocation Plan (SAP). This summary is an integral part of the Report that accompanies the SAP for public consultation. It provides an outline of the SA process and findings, including how the SA has influenced the development of the plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

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

2. 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 for the period 2011-2031. 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.
3. The original intention for the Site Allocations Plan (SAP), 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 will now be on the identification of reserve sites (calculated at 20% of overall housing – around 2,920 homes) 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. The SAP will identify 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.

4. In consideration of the time since the original SAP scoping and the changed circumstance, the Council is publishing a Revised Scoping Document for the SAP that comprises 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

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

5. The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans, and when compared with reasonable alternatives. This requirement for SA is in accordance with planning legislation and paragraph 165 of the National Planning Policy Framework. Local Plans must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
6. Stratford-on-Avon District Council commissioned independent specialist consultants, Enfusion, to progress the appraisal work in 2014. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant negative effects and enhancing positive effects. UK Guidance suggests a staged approach to SA/SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this scope, the SA is prepared and includes an SA Framework of objectives for sustainable development in the Stratford-on-Avon district area, and which forms the basis against which the SAP is assessed.

### **Sustainability Characteristics of the Stratford-on-Avon area and likely evolution without the SAP**

7. The Stratford-on-Avon District is the largest district in Warwickshire; however, the population density is low. There are over 200 villages and hamlets within the district. The West Midlands Green Belt is partially located in the north-western part, with the Cotswolds Area of Outstanding Beauty (AONB)

extending into the south of the District. There are several large settlements dispersed, including Stratford-upon-Avon, Alcester, Shipston-on-Stour and Southam. The District has a diverse historic environment, largely focused around the historic settlements, including Stratford-upon-Avon which is a key tourist destination due to its Shakespeare heritage. There are no internationally designated biodiversity sites in the District, but nationally designated SSSIs and locally designated sites are widely dispersed. The River Avon runs through the area, and fluvial flood risk is present in many places. Stratford-upon-Avon and Studley area designated as Air Quality Management Areas (AQMA), and there are congestion hotspots throughout the District.

8. There is an ageing population in the District, however health is generally good, although there are notable divides between deprived communities. There is a high level of both in- and out-commuting, but low levels of unemployment in the District. The transport network has good connections to Birmingham to the north, with sustainable transport ranging from cycle paths to rail services. However, the remoteness of some settlements makes access to services/facilities an issue. There is an identified shortfall of housing in the District, and market housing is the least affordable in Warwickshire.

### Key Sustainability Issues, Problems and Opportunities

9. The key sustainability issues and opportunities are summarised in the table below:

Key Sustainability Issues for the Stratford-on-Avon District
<ul style="list-style-type: none"> <li>■ <b>Congestion:</b> The District's 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.</li> <li>■ <b>Travel Methods:</b> Ensuring the viability and vitality of alternative modes of transport provides choice, helps to reduce congestion and can contribute to healthier lifestyles.</li> <li>■ <b>Health:</b> 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.</li> <li>■ <b>Population:</b> 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.</li> <li>■ <b>Housing:</b> 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.</li> <li>■ <b>Quality of Life:</b> The development of a high quality and multifunctional green infrastructure network in the District will be a key contributor to</li> </ul>

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 site 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.

### How has the SAP been assessed?

10. An SA Framework was compiled, including SA Objectives and decision-aiding questions/criteria that aim to resolve the issues and problems identified for development planning in the District. This SA Framework, together with the baseline information, comprises the basis for assessment. The Framework was the same as that used for the SA of the Core Strategy, updated and including detailed thresholds of significance that are appropriate for assessing site options. The SA Objectives are as follows:

Number	SA Objective
1	Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.
2	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.
3	Protect, enhance and manage biodiversity and geodiversity.
4	Reduce the risk of flooding.
5	Minimise the district's contribution to climate change.
6	Plan for the anticipated levels of climate change.
7	Protect and conserve natural resources.
8	Reduce air, soil and water pollution.
9	Reduce waste generation and disposal, and promote the waste hierarchy of reduce, reuse, recycle/compost, energy recovery and disposal.
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.
11	Reduce barriers for those living in rural areas.
12	Protect the integrity of the district's countryside.
13	Provide environmentally sound and good quality affordable housing for all.
14	Safeguard and improve community health, safety and wellbeing.
15	Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.

11. Each developing element of the draft SAP, was subject to Sustainability Appraisal. Using the SA Framework, the baseline information available, and professional opinion, the likely effects were assessed. The SA considered the nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary, cumulative and synergistic) and according to categories of significance as set out in the following table:

<b>Key: Categories of Significance</b>		
<b>Symbol</b>	<b>Meaning</b>	<b>Sustainability Effect</b>
- -	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

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

12. 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 subsidiary 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. At the Regulation 18 revised scoping stage, the SA considered three strategic options for defining Built Up Area Boundaries (BUABs) – tight; loose; no boundary. The SA also considered the proposals for Specific Sites, and the new Policy SAP.1 Self-Build & Custom Housebuilding with three specific sites identified.
13. It is anticipated that there will be a number of reasonable alternatives for options for the identification of Reserve Sites. All those site options that are considered to be reasonable alternatives (ie. available, suitable and deliverable) will be subject to SA and the findings will be published at the next stage of plan-making – Pre-Submission Regulation 19 consultation.

### **What are the likely significant effects of the SAP Regulation 18 SAP Revised Scoping?**

14. The draft SAP is likely to have positive effects for implementation of the Core Strategy requirements with reference to the provision of reserve sites to meet identified need. The opportunity is also taken to update specific site proposals in the Core Strategy to address changing circumstances. The revised proposed scope and approach to preparation of the SAP with identification of BUABs indicates positive effects for SA objectives on housing, employment and communities.

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

15. The potential for any negative effects is mitigated through Core Strategy Policies and the proposed approach to defining BUABs that applies criteria that excludes certain land uses.

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

16. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgment.

### **How has the SA influenced the draft SAP?**

17. The SA investigated early strategic level options for defining settlement boundaries (BUABs), helping to identify and refine these alternatives. The SA tested the reasonable alternatives for options for Reserve Sites. Where relevant, the SA made suggestions for possibilities to mitigate any significant negative effects identified.

### **Consultation**

18. The SAP SA Scoping Report was subject to formal consultation with the statutory environmental bodies and comments received have been considered. Comments made on this initial SA Report (December 2017) will be taken into account in the next stages of plan-making and assessment for Pre-Submission Regulation 19 consultation in the summer 2018.

### **Monitoring Proposals**

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

### **Next Steps**

20. This Initial SA Report accompanies the SAP Revised Scoping and Initial Options Regulation 18 consultation commencing in January 2018. Any comments on this initial 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>