



**STRATFORD-ON-AVON
SITE ALLOCATIONS PLAN (SAP):
Proposed Submission Regulation 19**

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

June 2019

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Stratford-on-Avon Site Allocations Plan (SAP): Proposed Submission Regulation 19 Consultation

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

NON-TECHNICAL SUMMARY June 2019

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Non-Technical Summary (NTS)

Non-Technical Summary of the Sustainability Report

1. This is the Non-Technical Summary (NTS) of the 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 regulations and 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 is now on the identification of reserve sites (to equate to 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.
4. The SAP also identifies Built-Up Area Boundaries (BUABs) for a wide range of settlements in accordance with Policy CS.15 of the adopted Core Strategy. However, BUABs are not identified for those settlements that are covered in Neighbourhood Plans that have been 'made' or reached an advanced stage in their production.
5. In consideration of the time since the original SAP scoping and the changed circumstances, the Council published in February 2018 a Revised Scoping & Initial Options Document for the SAP that 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

6. Additional specific issues also emerged that the Council considered appropriate to be included in the SAP, also subject to public consultation in early 2019, and as follows:
 - Birthplace/Gateway Cultural Quarter
 - Quinton Rail Technology Centre
 - A46 Safeguarding: A422 Wildmoor, A3400 Bishopton, & A439 Marraway
 - Employment Exception (Enabling) Sites Policy
7. Comments made during the consultations, together with updated evidence and ongoing studies, including the Strategic Housing Land Availability Assessment (SHLAA), informed the further development of the SAP to the Proposed Submission stage for Regulation 19 consultation.
8. The proposed SAP comprises:
 - Introduction
 - Reserve Housing Sites
 - Policy SAP.1 Identifying Reserve Housing Sites
 - Policy SAP.2 Releasing Reserve Housing Sites
 - Annex I Schedule of Reserve Housing Sites
 - Self-Build and Custom-Build Housing Sites
 - Policy SAP.3 Meeting Needs
 - Policy SAP.4 & Policy SAP.5 Sites
 - Built-Up Area Boundaries
 - Policy SP.6 Built-Up Area Boundaries
 - Employment Enabling Sites
 - Policy SAP.7 Sites
 - A46 Safeguarding
 - Policy SAP.8 A46 Safeguarding
 - 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 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

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

9. 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 32 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.
10. 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, a SA Framework of objectives for sustainable development in the Stratford-on-Avon District area was prepared, and this forms the basis against which the SAP is assessed.

Habitats Regulations Assessment (HRA)

11. The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the Stratford-on-Avon Development 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 Core Strategy has been shown to not have any adverse effects, alone or in-combination with other plans or projects, on the designated sites (more than 10 km distance) outside the District's boundary, and this includes Policy CS.16 on Reserve Housing Sites. There are also strong mitigation measures provided by Core Strategy CS.6 Natural Environment. Therefore, it is not necessary to consider HRA any further in relation to the SAP.

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

12. 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 are designated as Air Quality Management Areas (AQMA), and there are congestion hotspots throughout the District.

13. There is an ageing population in the District, however health is generally good, although there are notable divides within communities in relation to various quality of life indicators. 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 and to many towns close to the District's boundary, 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

14. 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"> ■ Congestion: 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. ■ 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 cover 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?

15. A 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.

16. Each element of the developing 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:

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

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What reasonable alternatives have been considered & addressed?

17. The requirement, context and principles for many of the components of 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 included 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 emerging new Policy on Self-Build & Custom Housebuilding with some specific sites identified.
18. In developing the SAP to Proposed Submission stage, additional issues emerged that the Council considered to be appropriate for inclusion in the SAP, as follows:
 - Birthplace/Gateway Cultural Quarter
 - Quinton Rail Technology Centre
 - A46 Safeguarding: A422 Wildmoor, A3400 Bishopton, & A439 Marraway
 - Employment Exception (Enabling) Sites
19. Options for Reserve Housing Sites: All options that are considered to be reasonable alternatives, i.e. Amber 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.

20. Options for the SAP – Identifying & Managing Reserve Housing Sites: Policy CS.16 specifies that reserve sites should have the capacity to deliver 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, the Council identified Scenarios to investigate, as follows:
- Scenario 1: excluding Amber sites in the Green Belt
 - Scenario 2: excluding Amber sites identified for Self-Build/Custom-Build
 - Scenario 3a: excluding Amber sites in settlements covered by made Neighbourhood Plans that identify reserves sites
 - Scenario 3b: excluding Amber sites in settlements covered by made Neighbourhood Plans regardless of whether they identify reserves sites
 - Scenario 4a: excluding Amber sites in Category 4 Local Service Villages
 - Scenario 4b: excluding Amber sites in Category 3 & 4 Local Service Villages
 - Scenario 4c: excluding Amber sites in Category 2, 3 & 4 Local Service Villages
 - Scenario 5: excluding Amber sites in the Green Belt (Scenario 1); identified as Self-Build/Custom-Build (Scenario 2); in settlements covered by made Neighbourhood Plans (Scenario 3a); and excluding Amber sites that cannot be delivered in the next 10 years (i.e. up to 2031 the Plan period)(Scenario 6)
 - Scenario 6: excluding Amber sites that cannot be delivered in the next 10 years (i.e. up to 2031 the Plan period)
 - Scenario 7: all other Site Proposals plus all Amber sites
21. All these options are considered to be reasonable alternatives (i.e. available, suitable and deliverable) and were subject to SA using the full SA Framework of SA objectives. The Council considered the evidence, consultation comments and the SA findings and developed a preferred approach that aligns with Scenario 5. The Council sought to find the required numbers of reserve housing sites that best promoted sustainable development and minimised potential negative effects, particularly on the historic and natural environment that is such a strong feature of the District. It may be noted that "doing nothing" is not a reasonable alternative for the Plan since the Council has a duty to plan positively for objectively identified needs for housing and employment land.

What are the likely significant effects of the Pre-Submission SAP?

22. Overall, the SAP will have positive effects for implementation of the Core Strategy requirements with reference to the provision of reserve housing sites in accordance with Core Strategy Policy CS.16.D. The opportunity was taken to update specific site proposals in the Core Strategy to address changing circumstances, and also include new requirements for self-build and custom-build housing, addressing employment enabling sites, and safeguarding land for A46 improvements in the future.

23. The SA found likely neutral effects for many SA objectives as sites have been selected to avoid or minimise potential negative effects and other Core Strategy Policies provide mitigation measures. With regard to soils, the SA found both positive effects, for locations on previously developed land, and negative effects, for locations with some best and most versatile agricultural land. 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. Sites have been selected to avoid potential impacts on the rich historic environment of the District, and site-specific requirements to mitigate any likely adverse effects have been included in Proposals.
24. 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 large settlements in the Districts. Air quality and climate change objectives are closely linked with transport factors. Overall, the SA found potential minor positive effects for these Sites as such development can help to resolve these existing sustainability issues. For the Reserve Housing Sites that are dispersed through the District overall, the SA found potential neutral effects, including cumulative effects.
25. With regard to landscape, 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 had reported the potential for negative cumulative effects for certain settlements that had a high concentration of sites with major negative effects for landscape, and thence the possibility for cumulative effects for the District as a whole. However, the requirements in Policies SAP.1 & SAP.2 provide mitigation measures that should minimise potential cumulative negative effects on landscape.
26. Overall, the SA found major positive effects for objectives on housing and employment; good quality housing and access to employment will also have positive effects for health and well-being.

How could negative effects be mitigated?

27. The potential for any negative effects is mitigated through Core Strategy Policies, site-specific requirements where necessary and the proposed approach to identifying, releasing and managing reserve housing sites. The Council has sought to avoid important environmental assets and their settings and also to identify opportunities for enhancement.

Were there any difficulties encountered?

28. 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 Pre-Submission SAP?

29. The SA investigated early strategic level options for defining settlement boundaries (BUABs), helping to identify and refine these alternatives. The SA tested the Specific Site Proposals and other Policies - where relevant, the SA made suggestions for possibilities to mitigate any significant negative effects identified. The SA tested the reasonable alternatives – Amber sites from the SHLAA – relating to the options for Reserve Housing Sites. The SA assessed the identified Scenarios for the SAP and the findings informed the decision-making towards the preferred approach and refinement of the Policies SAP.1 & SAP.2, with particular attention to the possibilities for cumulative effects on landscape at certain settlements.

Consultation

30. Comments made on earlier SA Reports have been taken into consideration in preparing this Proposed Submission SA Report. Comments made on this SA Report (June 2019) will be submitted together with the Proposed SAP to the Secretary of State for independent examination in due course.

Monitoring Proposals

31. 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 Authority Monitoring Reports (AMRs), and the Stratford-on-Avon District Council Monitoring Report (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

Next Steps

32. This SA Report accompanies the Proposed Submission SAP on Regulation 19 consultation commencing in the summer of 2019. Any comments on this SA Report should be made during this statutory consultation stage in accordance with guidance provided by the District Council.