

Interim Sustainability Appraisal of the South Warwickshire Local Plan

Regulation 18: Preferred Options Stage

Volume 2 of 2: Appendices

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LEPUS CONSULTING
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Interim Sustainability Appraisal of the South Warwickshire Local Plan

Regulation 18: Preferred Options Stage

Volume 2 of 2: Appendices of the Regulation 18 SA

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Appendix A: SA Framework

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
1	<p>Climate change: Reduce the authorities' contribution towards the causes of climate change and adapt to the anticipated effects of climate change.</p>	<ul style="list-style-type: none"> • Help to reduce the per capita carbon footprint in the plan area? • Help to reduce reliance on personal car use? • Encourage renewable energy generation or use of energy from renewable sources? • Ensure that sustainable construction principles are integrated into developments, including energy efficient building design? • Encourage climate change resilience? • Include measures to adapt to anticipated effects of climate change? 	<ul style="list-style-type: none"> • GHG emissions from domestic and industrial/commercial sources • Energy generation/use from renewable or low-carbon sources • Proximity of development to public transport links • Encourage active travel to local services and amenities • Incorporation of GI measures to reduce overheating in summer, such as publicly accessible green space and tree planting to support urban cooling • Implementation of adaptive techniques in building design e.g. passive heating/cooling
2	<p>Flood risk: Reduce and plan for flood risk including anticipated levels as a result of climate change.</p>	<ul style="list-style-type: none"> • Avoid development in areas at high risk of flooding and seek to reduce flood risk? • Increase green infrastructure (GI) coverage and connectivity? • Promote the use of technologies to adapt to the impacts of climate change? • Ensure that development is resilient to the effects of extreme weather events? • Include measures to reduce the risk of flooding? 	<ul style="list-style-type: none"> • Development located in areas at greater risk of fluvial and surface water flooding and mitigation measures required to mitigate flood risk • Provision of sustainable drainage systems (SuDS) • Provision and connectivity of Green and Blue Infrastructure • Use of climate change allowances regarding flood risk, appropriate to the development type
3	<p>Biodiversity and geodiversity: Protect, enhance and manage biodiversity and geodiversity.</p>	<ul style="list-style-type: none"> • Protect, maintain or enhance features of biological and geological importance? • Support the positive management of local biodiversity and geodiversity sites? • Contribute towards the wider GI and ecological network? • Deliver biodiversity net gain? • Create opportunities for biodiversity to adapt to a changing climate? 	<ul style="list-style-type: none"> • Potential impacts on sites designated for their biological or geological interest • Protection and enhancement of priority habitats • Measures to protect and/or enhance opportunities for priority species • Provision, connectivity and management of GI to enhance the habitat network • Biological quality of watercourses

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
4	<p>Landscape: Conserve, enhance and manage the quality and character of landscapes and townscapes.</p>	<ul style="list-style-type: none"> Safeguard and enhance local character and distinctiveness and strengthen sense of place? Protect and enhance visual amenity? Restore and enhance degraded landscapes or townscapes? Protect and enhance the special character of nationally designated landscapes? Affect the purposes of the Green Belt, such as, prevent coalescence of settlements and urban sprawl? 	<ul style="list-style-type: none"> Effects on the special qualities of nationally designated landscapes, such as the Cotswolds National Landscape Identified local landscape characteristics and sensitivities within the published Landscape Character Assessment or any published landscape sensitivity assessment Impact on views and tranquillity Re-use of brownfield land and/or derelict buildings Development in the Green Belt The quality of streetscapes and the public realm
5	<p>Cultural heritage: Conserve and enhance the historic environment in an appropriate manner to the significance of heritage assets and their setting.</p>	<ul style="list-style-type: none"> Conserve and/or enhance the significance of designated and non-designated heritage assets including their settings where this contributes to significance? Respect, maintain and strengthen local character, distinctiveness and sense of place? Sustain and enhance the significance of heritage assets by putting them to viable use, increase public access or understanding and/or encourage tourism which are consistent with their conservation? Re-use/retain historic buildings or fabric, or improve their energy efficiency? Conserve or enhance archaeological sites/remains? 	<ul style="list-style-type: none"> Potential impacts on heritage assets including Listed Buildings, Scheduled Monuments, Conservation Areas and Registered Parks and Gardens and their settings Potential impacts on identified locally important heritage assets or archaeological features Historic assets on Historic England's Heritage at Risk register Historic characterisation and sensitivity studies
6	<p>Pollution: Reduce pollution and mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.</p>	<ul style="list-style-type: none"> Help to improve air quality and avoid generating further air pollution? Avoid locating residents or employees in areas of poor air quality? Help to improve water quality and avoid generating further pollution to watercourses or groundwater? Remediate land affected by ground contamination? Help to reduce noise pollution and avoid generating further noise disturbance? Reduce pollution? 	<ul style="list-style-type: none"> Receptors located within, or in proximity to, Air Quality Management Areas (AQMA) Areas of NO₂ or PM₂₅ exceedance Proximity to main roads Watercourse and groundwater quality Remediation of contaminated land

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
7	<p>Natural resources: Protect and conserve natural resources including soil, water and minerals.</p>	<ul style="list-style-type: none"> • Make use of previously developed, degraded or under-used land? • Minimise the loss of best and most versatile (BMV) agricultural land? • Avoid loss or sterilisation of mineral resources? • Ensure efficient use of water resources and seek opportunities for water recycling? 	<ul style="list-style-type: none"> • Re-use of previously developed or brownfield land • Area of potential BMV land • Potential sterilisation of land within Mineral Safeguarding Areas • Remediation of contaminated land
8	<p>Waste: Reduce waste generation and disposal and support sustainable management of waste.</p>	<ul style="list-style-type: none"> • Maximise the re-use, recycling and composting of waste? • Minimise and where possible avoid the generation of excess waste during construction and occupation of development? 	<ul style="list-style-type: none"> • Household waste generation • Industrial/commercial waste generation • Rates of recycling and composting • Capacity of waste management facilities
9	<p>Housing: Provide affordable, high quality and environmentally sound housing for all.</p>	<ul style="list-style-type: none"> • Provide a suitable mix and tenure of housing including affordable homes and homes suitable for first-time buyers? • Provide housing suitable to accommodate the ageing population? • Meet the needs of the Gypsy, Traveller and Travelling Showpeople communities? • Ensure that the best use is made of existing housing stock? 	<ul style="list-style-type: none"> • Housing stock • Provision of varied housing mix • Provision of affordable housing • Provision of care homes or sheltered accommodation • Gypsies and Travellers accommodation • Meeting the need for custom and self-build homes.

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
10	Health: Safeguard and improve community health, safety and wellbeing.	<ul style="list-style-type: none"> • Improve access to local health and leisure facilities? • Provide good access to open spaces and the GI network? • Facilitate active travel and encourage healthy lifestyles? • Ensure the needs of the ageing population are met? • Create safe neighbourhoods and support community cohesion? • Reduce crime and the fear of crime? 	<ul style="list-style-type: none"> • Proximity to sources of air pollution (e.g. AQMAs and main roads) • Proximity to NHS hospital • Proximity to GP surgery • Provision and accessibility of public green spaces and recreation facilities • Connectivity to pedestrian and cycle networks • Indices of Multiple Deprivation/Lower Super Output Areas • Health indicators • Rates of crime
11	Accessibility: Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.	<ul style="list-style-type: none"> • Reduce the need to travel and/or reduce travel time? • Support a modal shift away from personal car use? • Maximise opportunities for access via a range of sustainable transport modes including walking, cycling and public transport? 	<ul style="list-style-type: none"> • Proximity to bus stop and frequency of bus services • Proximity and accessibility to railway stations • Proximity to local shops, facilities and employment opportunities • Connectivity to pedestrian and cycle networks
12	Education: Increase access to education and improve attainment to develop and maintain a skilled workforce.	<ul style="list-style-type: none"> • Provide or improve sustainable access to education and training opportunities? • Support the provision of an appropriately skilled workforce? • Support opportunities for community enterprises and the voluntary sector? 	<ul style="list-style-type: none"> • Proximity to primary and secondary schools • Capacity of primary and secondary schools • Access to higher education opportunities • Qualification levels e.g. National Vocational Qualifications
13	Economy: Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.	<ul style="list-style-type: none"> • Provide or improve sustainable access to a range of employment opportunities? • Protect and create jobs? • Encourage business start-ups in the plan area? • Protect and enhance the vitality and viability of existing employment areas? • Protect and enhance the vitality and viability of town centres? 	<ul style="list-style-type: none"> • Access to employment opportunities • Provision of employment floorspace • Support for town centres and town centre regeneration • Number of vacant units • Rates of unemployment

Appendix B: Assessment of Strategic Growth Locations

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B.1 Introduction

B.1.1 The purpose of this appendix

- B.1.1.1 This appendix provides an appraisal of 24 potential Strategic Growth Locations (SGL), identified by the South Warwickshire Councils at the Regulation 18 Preferred Options stage of plan-making. The SGLs set out potential locations for large-scale and strategic growth, and will be considered as one source of growth to meet a proportion of the identified housing and employment needs for 2025-2050.
- B.1.1.2 The assessments have been carried out using the red line boundary and development proposal information provided by the Councils, as set out in **Table B.1.1**. The location of each SGL is shown in **Figure B.1.1**. Specific development boundaries may be subject to change over the plan-making process
- B.1.1.3 The SGLs have been assessed for likely impacts on each of the 13 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in tables within this report, in accordance with the methodology set out in **Chapter 2** of the main SA Report. All assessments at this stage of plan making are based on a desktop review of available data provided by the South Warwickshire Councils, and information publicly available about receptors and sources.
- B.1.1.4 A high-level ranking exercise has been undertaken for the SGLs, where the five best and worst performing options have been identified under each SA Objective. These are not ranked in any particular order besides the SGL which has been identified as the overall best or worst performing option. Mitigation has not been considered when ranking the SGLs at this stage, however it is acknowledged that rankings are susceptible to change post-mitigation. It must be acknowledged that rankings are not prescriptive and are limited by the methodology and data available to inform assessments. Any attempt to accurately predict a best or worst performing option can only be approximate because the assessment process and outputs are high-level.
- B.1.1.5 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by Stratford-on-Avon and Warwick District Councils, as well as expert judgement.
- B.1.1.6 Throughout the assessment narrative in this appendix, a number of recommendations have been made for further surveys to improve granularity of assessment, as well as recommendations to carefully consider the layout and design of new development and any accompanying green infrastructure (GI) provision and other supporting uses to avoid, reduce or mitigate identified adverse effects. A summary of these recommendations can also be found in **Chapter 9** of the main SA Report.

Table B.1.1: Reasonable alternative strategic growth location details

SGL reference	SGL name	Estimated housing capacity	SGL area (ha)	SGL use
SG01	South of Coventry	4,621	462.16	Mixed
SG02	Stoneleigh Park Employment	0	246.44	Mixed
SG03	Coventry Airport	0	117.28	Employment
SG04	South of Kenilworth	1,271	60.85	Residential
SG05	East of Lillington	2,024	82.77	Residential
SG06	North of Leamington	2,978	146.03	Residential
SG07	Wedgnock Park Farm Employment	0	169.03	Employment
SG08	West of Warwick	1,696	52.76	Residential
SG09	South of Europa Way	823	212.64	Mixed
SG10	Bishop's Tachbrook	4,024	183.67	Mixed
SG11	South East of Whitnash	7,071	353.87	Mixed
SG12	Southam	3,464	163.31	Mixed
SG13	Gaydon Lighthorne Heath	4,539	836.97	Mixed
SG14	East of Gaydon	1,373	190.53	Mixed
SG15	North of Wellesbourne	9,221	461.41	Mixed
SG16	South of Wellesbourne	2,479	194.35	Mixed
SG17	Shipston-on-Stour	3,003	131.95	Mixed
SG18	West of Stratford-upon-Avon	5,521	292.06	Mixed
SG19	East of Stratford-upon-Avon	5,469	229.19	Mixed
SG20	Bidford-on-Avon	5,361	254.55	Mixed
SG21	Alcester	3,163	158.30	Mixed
SG22	West of Studley	1,046	49.33	Residential
SG23	North of Henley-in-Arden	2,499	124.17	Mixed
SG24	Hockley Heath	2,875	133.51	Mixed

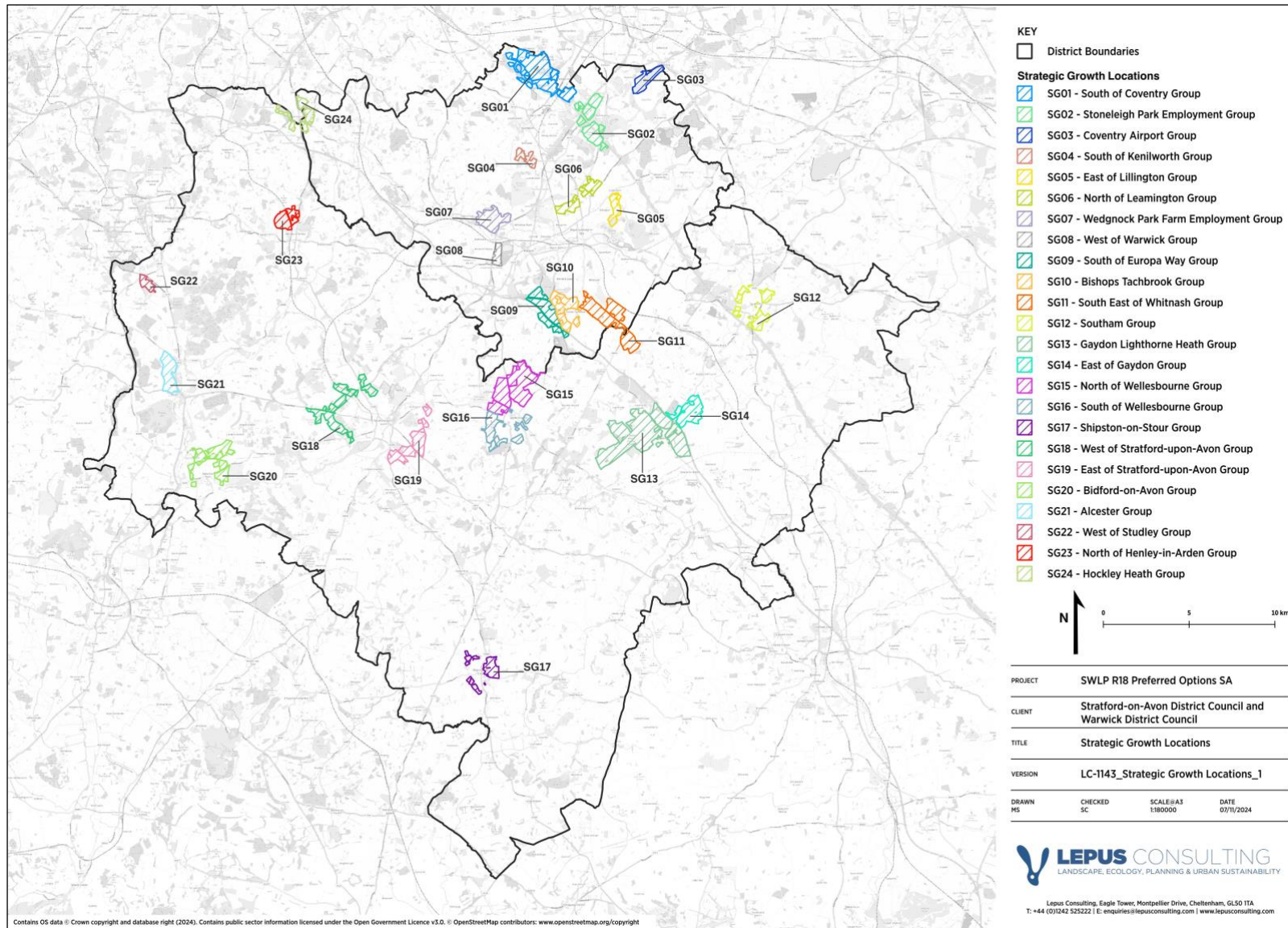


Figure B.1.1: Location of the 24 strategic growth locations within South Warwickshire

B.2 SA Objective 1: Climate Change

B.2.1 Potential increase in carbon footprint

B.2.1.1 The proposed development is likely to result in an increase in greenhouse gas (GHG) emissions associated with construction and occupation of new development. Any development of over 639 dwellings in Stratford-on-Avon and 715 dwellings in Warwick is likely to result in an increase carbon emissions by 1% or more, compared to the current emissions. The large amount of growth associated with the SGLs will be expected to result in a significant contribution towards South Warwickshire’s total GHG emissions, particularly in previously undeveloped locations where a greater proportion of soil resources and associated carbon stores are likely to be lost. A major negative impact is identified across the residential-led SGLs.

B.2.1.2 Three of the SGLs are proposed solely for employment use, where contextual details regarding the specific nature and scale of development each site will incorporate is currently unknown. Consequently, the impact that these SGLs may have with regard to South Warwickshire’s GHG emissions as a whole is uncertain.

Table B.2.1: Assessment of SGLs against SA Objective 1: Climate Change

SGL no.	Strategic Growth Location	Potential increase in carbon footprint
SG01	South of Coventry	--
SG02	Stoneleigh Park Employment	+/-
SG03	Coventry Airport	+/-
SG04	South of Kenilworth	--
SG05	East of Lillington	--
SG06	North of Leamington	--
SG07	Wedgnock Park Farm Employment	+/-
SG08	West of Warwick	--
SG09	South of Europa Way	--
SG10	Bishop’s Tachbrook	--
SG11	South East of Whitnash	--
SG12	Southam	--
SG13	Gaydon Lighthorne Heath	--
SG14	East of Gaydon	--
SG15	North of Wellesbourne	--
SG16	South of Wellesbourne	--
SG17	Shipston-on-Stour	--
SG18	West of Stratford-upon-Avon	--
SG19	East of Stratford-upon-Avon	--
SG20	Bidford-on-Avon	--
SG21	Alcester	--
SG22	West of Studley	--
SG23	North of Henley-in-Arden	--
SG24	Hockley Heath	--

B.2.2 Ranking

B.2.2.1 SGLs have not been fully ranked against climate change, where the assessment is based on limited data solely relating to their housing capacities. The indicative capacity of each of the SGLs would be the only information available to inform the ranking, potentially introducing bias by assuming emissions will increase with the number of new homes. More detail regarding impacts relating to climate change can be seen in Flood Risk (SA Objective 2), Pollution (SA Objective 6), and Accessibility (SA Objective 11). A more detailed carbon footprinting exercise could allow for more meaningful evaluation, as well as any further detail on the potential for SGLs to draw on low-carbon and renewable technologies, as discussed in **section B.2.3** below.

B.2.2.2 Omitting employment-led SGLs where there is greater uncertainty in the end use, all 21 SGLs with residential capacity are expected to result in significant adverse impacts on climate change, where the proposed scale of development is expected to lead to a significant increase in GHG emissions in the SWLP area. Drawing on the limited information available, the **best performing** option would be identified as South of Europa Way which has an estimated capacity for 823 homes, and the **worst performing** option would be identified as North of Wellesbourne, which has an estimated capacity of 9,221 homes.

B.2.3 Mitigation potential

B.2.3.1 Given the large scale of development proposed including a high number of new homes associated with the SGLs, the potential to sufficiently reduce the increased demand in energy resources is limited. However, with the integration of low-carbon technologies such as through solar or wind electricity generation, it is likely the development of the SGLs will have the capacity to reduce levels of associated carbon emissions. At this stage there is no information available regarding the potential of any SGLs to draw on or provide such technologies, but it is recommended this is explored further by the Councils. Draft SWLP policies / policy directions under the 'A Climate Resilient and Net Zero Carbon South Warwickshire' topic will be vital in this regard (see **Appendix E**).

B.2.3.2 Appropriate design and layout of proposals, including tree planting and landscaping, retrofitting any existing buildings on site to make them energy efficient, and exploring potential for decentralised heat and energy networks will help to reduce energy consumption and increase resilience to increased temperatures. National and local design policy and guidance should be followed to ensure development is considering approaches to mitigate climate change¹, such as through integrating solar panels and avoiding the use of gas boilers. Provision of necessary infrastructure should be provided to encourage low carbon options such as charging points for electric vehicles (EV) and protection and enhancement of public spaces to facilitate safe walking and cycling opportunities. Furthermore, quantifying and reducing embodied carbon throughout the development at the new settlements will help to reduce carbon impacts, coupled with any opportunities for using locally sourced and low carbon building materials.

¹ TCPA and RTPI (2023). The Climate Crisis. A Guide for Local Authorities on Planning for Climate Change. Available at: <https://www.tcpa.org.uk/resources/the-climate-crisis-a-guide-for-local-authorities-on-planning-for-climate-change/> [Date accessed: 05/11/24]

- B.2.3.3 Additionally, the integration of GI such as through green roofs and increased canopy cover is likely to increase carbon sequestration, whilst also supporting ecosystem services which will help mitigate the harmful effects of climate change. In order to ensure the impacts of development are minimised throughout the construction, occupation and end-of-life stages, conducting a whole-life carbon assessment is recommended to optimise energy usage and resource efficiency, mitigate the release of embodied carbon, and provide a baseline for measuring outputs which have potential to impact climate change.

B.3 SA Objective 2: Flood Risk

B.3.1 Riparian flood zones

- B.3.1.1 Riparian flood zones 2 and 3 are present within South Warwickshire along the River Avon and its tributaries including Gran Brook, Marchfront Brook Telsford Brook and Tach Brook, among others. Flood zone 2 indicates up to a 1% annual chance of flood risk from rivers, whilst flood zone 3 indicates over a 1% chance of flood risk from rivers. Riparian flood zones and associated flood risk is most prominent along the River Avon, in particular through Stratford-upon-Avon, Wellesbourne and up to Warwick, including through the West of Warwick and North of Wellesbourne SGLs.
- B.3.1.2 A total of six SGLs are located wholly within flood zone 1 or a less than 0.1% annual chance of flood risk, including Coventry Airport, East of Gaydon, East of Lillington, East of Stratford-upon-Avon, Hockley Heath and West of Studley SGLs. A further seven SGLs contain a very small proportion of land within flood zone 2 and/or 3 including Gaydon Lighthorne Heath, North of Henley-in-Arden, North of Leamington Spa, South of Europa Way, South of Kenilworth, South of Wellesbourne and Wedgnoek Park Farm Employment SGLs. These 13 SGLs will be expected to have minimal harmful impacts associated with riparian flooding and as such will be expected to have a minor positive impact on flooding.
- B.3.1.3 A total of seven SGLs including Bidford-on-Avon, Bishop's Tachbrook, South East of Whitnash, South of Coventry, Southam, Stoneleigh Park and West of Stratford-upon-Avon are situated where less than 10% of the SGL coincides with flood zone 2 or 3. A negligible impact has therefore been identified for these eight SGLs on flooding.
- B.3.1.4 The remaining four SGLs including Alcester, North of Wellesbourne, Shipston-on-Stour, and West of Warwick are situated where between 10 to 50% of the SGL coincides with flood zones 2 or 3 and have a more significant risk of riparian flooding. As such, these SGLs will be expected to have a minor negative impact on flood risk.

B.3.2 Surface water flood risk

- B.3.2.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. SWFR in South Warwickshire is prevalent affecting various aspects of the Plan area including roads and pathways within the urban areas, as well as in the rural countryside locations. For all 24 SGLs proposed within South Warwickshire less than 10% of the SGL coincides with areas at a high risk of surface water flooding. These 24 SGLs have been identified as having a negligible impact on SWFR, based on the currently available SWFR extent data.
- B.3.2.2 No specific data is available to determine how the introduction of new impermeable surfaces associated with development within the SGLs will affect the extent of SWFR in the future.

Table B.3.1: Assessment of SGLs against SA Objective 2: Flood Risk

SGL no.	Strategic Growth Location	Riparian flood zones	SWFR
SG01	South of Coventry	0	0
SG02	Stoneleigh Park Employment	0	0
SG03	Coventry Airport	+	0
SG04	South of Kenilworth	+	0
SG05	East of Lillington	+	0
SG06	North of Leamington	+	0
SG07	Wedgnoek Park Farm Employment	+	0
SG08	West of Warwick	-	0
SG09	South of Europa Way	+	0
SG10	Bishop’s Tachbrook	0	0
SG11	South East of Whitnash	0	0
SG12	Southam	0	0
SG13	Gaydon Lighthorne Heath	+	0
SG14	East of Gaydon	+	0
SG15	North of Wellesbourne	-	0
SG16	South of Wellesbourne	+	0
SG17	Shipston-on-Stour	-	0
SG18	West of Stratford-upon-Avon	0	0
SG19	East of Stratford-upon-Avon	+	0
SG20	Bidford-on-Avon	0	0
SG21	Alcester	-	0
SG22	West of Studley	+	0
SG23	North of Henley-in-Arden	+	0
SG24	Hockley Heath	+	0

B.3.3 Ranking

Best performing	Worst performing
SG03: Coventry Airport	SG08: West of Warwick
SG05: East of Lillington	SG21: Alcester
SG04: South of Kenilworth	SG15: North of Wellesbourne
SG22: West of Studley	SG17: Shipston-on-Stour
SG09: South of Europa Way	SG18: West of Stratford-upon-Avon

B.3.3.1 The SGLs have been ranked with respect to flood risk by considering the percentage of SGLs which lie within flood zones. Less weighting has been given to SWFR, as none of the SGLs are identified to result in a significant effect on this receptor based on currently available information.

- B.3.3.2 The **best performing** options are Coventry Airport and East of Lillington, which both lie wholly outside of flood zones 2 and 3, as well as areas of SWFR. South of Kenilworth, West of Studley and South of Europa Way follow close behind where less than 1% of the SGL coincides with flood zones 2 and 3, or areas of high SWFR. Several other SGLs were considered to perform similarly, where positive impacts have been identified for flood risk and negligible impacts for surface water flooding. These include North of Leamington, South of Wellesbourne, Gaydon Lighthorne Heath, North of Henley-in-Arden, Wedgnoek Park Farm, East of Gaydon, East of Stratford-upon-Avon, Hockley Heath and West of Studley.
- B.3.3.3 The **worst performing** option is the West of Warwick SGL, where 46% of the site lies within flood zones 2 and 3. The Alcester, North of Wellesbourne and Shipston-on-Stour SGLs are located where between 14 and 17% of the SGL boundaries lie within flood zones 2 and 3, and are also likely to result in negative impact of flood risk. Approximately 5% of the West of Stratford-upon-Avon also lies within flood zone 3, although the impact of this is expected to be less significant than for the other SGLs in the five worst performing for flood risk, where higher proportions of flood zones 2 and 3 are present.

B.3.4 Mitigation potential

- B.3.4.1 Despite some of the SGLs including a greater area at risk of riparian flooding and surface water flooding than others, there are opportunities through which the worst impacts associated with flood risk could be mitigated. The Sequential Test will need to be applied to prioritise development within areas at lowest risk of flooding, in order to avoid locating development within Flood Zones 2 and 3.
- B.3.4.2 It should be noted that other potential sources of flood risk, such as sewer flood risk, should also be explored and quantified where specific data has not been available to inform the SA assessments. It is expected that site-specific flood risk assessments will be undertaken, in accordance with Draft SWLP Policy J (see **Appendix E**).
- B.3.4.3 Any allocated development proposals should incorporate sustainable drainage systems (SuDS) in order to support better management of surface water and reduce surface water flood risk; this would be particularly beneficial for the SGLs which are based in more urban locations, such as East of Stratford-upon-Avon, East of Lillington, North of Leamington and West of Warwick. In current undeveloped locations, new development should aim to retain the current greenfield runoff rates. Opportunities should be sought for incorporating SuDS that can secure multi-functional benefits, as highlighted in Draft SWLP Policy K (see **Appendix E**). Through the carefully planning and integration of green and blue infrastructure, development locations could be expected to benefit from the various ecosystem service functions these provide, including slowing surface water flows through greater coverage of trees and hedgerows, which would work to improve soil stability and infiltration, and protect natural flood storage capabilities.

B.3.4.4 Additionally, through restoring rivers to their natural pathways and removing culverts, effective flow and water management can be achieved away from built developments. Opportunities should be sought to conserve and improve natural river corridors particularly where watercourses flow through or adjacent to development locations, such as the North of Wellesbourne and Stoneleigh Park Employment SGLs. Incorporating these nature-based solutions into the design and layout of development will be expected to support reduced levels of riparian flooding, as per Environment Agency guidance².

² Environment Agency (2021). Use nature-based solutions to reduce flooding in your area. Available at: <https://www.gov.uk/guidance/use-nature-based-solutions-to-reduce-flooding-in-your-area>. [Date accessed: 11/11/2024]

B.4 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

B.4.1 European sites

B.4.1.1 European sites are a network of areas designated for nature protection which include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. There are no European sites located within the SWLP area, with the nearest being Bredon Hill approximately 10km south east of the Plan area, and Ensor's Pool 14km north of the Plan area. The HRA will identify impact pathways beyond these distances.

B.4.1.2 The impact of all 24 SGLs on European sites is uncertain at this stage, as the conclusions of the HRA process are currently unknown, and no differential impact is identified for the SGLs. Due to the proximity of European sites from the Plan area, direct negative impacts are unlikely, although there is potential for water quality and/or quantity impacts downstream arising from any development within the SWLP area.

B.4.2 Sites of Special Scientific Interest

B.4.2.1 Sites of Special Scientific Interest (SSSI) are areas of land or water designated for their biodiversity and habitat value. There are 43 SSSIs located wholly or partially within South Warwickshire, some of which have potential to be affected by the proposed development associated with the SGLs.

B.4.2.2 A total of five SGLs, Alcester, Bidford-on-Avon, Bishop's Tachbrook, East of Gaydon and South of Kenilworth, do not lie in proximity to any SSSIs, nor do they fall within any impact risk zones (IRZs) associated with SSSIs. A further 14 SGLs wholly or partially fall within IRZs, however these are not anticipated to fulfil any criteria which may require consultation with Natural England. Consequently, these 19 SGLs are not anticipated to have any significant adverse impacts and as such have been identified as having a negligible impact on the SSSIs in South Warwickshire.

B.4.2.3 Five SGLs (Coventry Airport, Shipston-on-Stour, South of Wellesbourne, West of Stratford-upon-Avon and West of Studley) lie within IRZs which indicate that consultation with Natural England (NE) will be required prior to development. For South of Wellesbourne, West of Stratford-upon-Avon, West of Studley, and a small portion of Shipston-on-Stour SGL, consultation is required with NE for proposed residential developments of 100 or more homes. For Coventry Airport, given the proposed use of this SGL as employment and its current use as an airport, this may also require consultation with NE where the activity associated with an airport has the potential for adverse impacts on SSSIs and their settings. A minor negative impact has therefore been identified for these five SGLs on SSSIs.

B.4.3 National Nature Reserves

- B.4.3.1 There are no National Nature Reserves (NNRs) present within the SWLP area, with the nearest NNRs being Foster’s Green Meadow in Worcestershire, Bredon Hill in the north Cotswolds and Wychwood Forest in Oxfordshire. Due to the distance of all the SGLs from NNRs, development is not anticipated to result in significant adverse effects on the NNRs. However, some of the SGLs lie in closer proximity to nearby NNRs than others. For example, West of Studley is the closest SGL to an NNR, being located approximately 8km away from Foster’s Green Meadows NNR, and although unlikely to lead to direct adverse effects may be more likely to generate increased visitors to this site than other SGLs. Other SGLs including Bidford-on-Avon are located 18km from Bredon Hill NNR, and Shipston-on-Stour is located 22km from Wychwood Forest NNR.

B.4.4 Ancient woodland

- B.4.4.1 South Warwickshire is heavily wooded, particularly throughout Stratford-on-Avon District. Stands of ancient woodland are situated throughout the Plan area, predominantly in the north west of Stratford-on-Avon and the north of Warwick. Consequently, over half of the SGLs are anticipated to result in adverse impacts on ancient woodland.
- B.4.4.2 A total of 10 SGLs are located in close proximity to stands of ancient woodland. SGLs including Alcester, East of Gaydon, Gaydon Lighthorne Heath, Hockley Heath, South East of Whitnash, South of Europa Way, South of Kenilworth, South of Wellesbourne, Wedgnock Park Farm Employment and West of Stratford-upon-Avon, are located adjacent or in close proximity to ancient woodland parcels and developments at these locations have the potential to cause damage through increased levels of pollutants, worsening air quality and increased footfall from walkers and dogs. As such, these 10 SGLs are anticipated to result in minor negative impacts on ancient woodland.
- B.4.4.3 The remaining two SGLs including South of Coventry SGL which coincides with Whitefield Coppice and Rough Knowles Wood, and Stoneleigh Park Employment SGL which coincides with Kings Wood, are located where 0.5% and 4% of the SGL respectively coincides with ancient woodland. Although the proportions of ancient woodland which coincide with these SGLs appears small, these still form large areas within each SGL of 1.6ha and 16ha cumulatively. Ancient woodland habitats form part of a wider ecological network which has the potential to become increasingly fragmented with incremental losses of small parcels of key habitat containing important local flora and fauna. These SGLs are expected to have a major negative impact on ancient woodland where this could be wholly lost or the integrity of the habitat compromised.
- B.4.4.4 A total of 12 SGLs within the Plan area are not anticipated to significantly impact ancient woodland, primarily due to larger distances between the SGLs and the nearest ancient woodlands. For these SGLs including Bidford-on-Avon, Bishop’s Tachbrook, Coventry Airport, East of Lillington, East of Stratford-upon-Avon, North of Henley-in-Arden, North of Leamington, North of Wellesbourne, Shipston-on-Stour, Southam, West of Studley and West of Warwick, a negligible impact has been identified on ancient woodland.

B.4.5 Local Nature Reserves

- B.4.5.1 Local Nature Reserves (LNRs) are areas designated to be managed by the local authority which support areas of value for local wildlife. There 14 LNRs in the SWLP area. The majority of the SGLs proposed for development are not expected to result in any adverse impacts on LNRs, given their distance from LNRs.
- B.4.5.2 A total of five SGLs are expected to result in adverse impact on LNRs. Alcester SGL is located 0.5km from the River Arrow LNR and has the potential for adverse impacts on the LNR, such as through increased footfall along the river, as well as potential harm to the quality of water from pollution associated with the development at this SGL.
- B.4.5.3 Coventry Airport SGL is located in close proximity from several LNRs, including 400m from Stonebridge Meadows. The nature of the use of this SGL and potential development within it could harm the LNRs through an increase in air and noise pollution from heavy goods vehicles, which are more likely to be associated with employment locations.
- B.4.5.4 East of Lillington SGL is located 500m from Leam Valley LNR and also lies in close proximity to other LNRs. South of Coventry also lies adjacent to Tocil Wood, and West of Stratford-upon-Avon lies 600m from Welcombe Hills. Increased numbers of recreational visitors have potential to increase impacts on these LNRs, such as dog walkers who have potential to disturb the flora and fauna, littering, and an increase in levels of air pollution from vehicles. As a result, a minor negative impact has been identified for these five SGLs.
- B.4.5.5 The remaining 19 SGLs do not coincide with, nor are located in close proximity to any LNRs. The potential development at these SGLs is expected to result in a negligible impact on LNRs.

B.4.6 Local Wildlife Sites

- B.4.6.1 Local wildlife sites (LWSs) are non-statutory biodiversity sites identified by local authorities, which seek to preserve and protect the quality of local habitats. South Warwickshire contains over 1,000 LWSs which are distributed across the Plan area. All 24 of the SGLs will have potential to result in adverse impacts on LWSs.
- B.4.6.2 A total of seven SGLs are expected to have the potential for some adverse impacts on LWSs as a result of proximity or partial coincidence. Bishop's Tachbrook, Coventry Airport, South of Europa Way, South of Kenilworth, Southam and West of Studley SGLs all lie adjacent to LWSs, or have small proportions which coincide the LWSs, particularly as many of these SGLs lie in proximity to the River Avon and its tributaries which spans the length of the Plan area. East of Lillington SGL lies in close proximity to several LWSs including Newbold Comyn, the Runghills and Cubbington Churchyard. As such, these seven SGLs are anticipated to result in a minor negative impact on various LWSs.
- B.4.6.3 Given the number and wide-spread distribution of LWSs throughout the Plan area, 17 of the SGLs lie where a significant proportion coincides with LWSs, which has potential to result in substantial loss or degradation of the LWSs. For instance, 20% of Stoneleigh Park Employment SGL coincides with Stoneleigh Park LWS, which will be expected to result in a substantial loss of the LWS and therefore increase habitat fragmentation in South Warwickshire. Therefore, major negative effects have been identified for these 17 SGLs where there is potential for substantial losses or degradation of LWSs, resulting in subsequent harm and fragmentation to the ecological network in the Plan area.

B.4.7 Local Geological Sites

B.4.7.1 Local geological sites (LGSs) are non-statutory geological designations identified by local authorities to maintain the geological assets within the Plan area. A total of 89 LGSs are located within South Warwickshire.

B.4.7.2 The majority of SGLs are not located in close proximity to LGSs; only four SGLs have been identified as having potential for having adverse impacts of LGSs. Two SGLs lie adjacent to LGSs and are likely to detract from the value of irreplaceable habitats and geological formations within these sites. South of Coventry SGL lies adjacent to Gibbet Hill Middle Quarry, and the Southam SGL lies adjacent to Southam Cement Quarry and Southam Bypass Cutting. In addition, North of Leamington lies 300m from Old Milverton River Terraces, and West of Stratford-upon-Avon lies 500m from Stratford Racecourse. As a consequence, a minor negative impact is identified for these SGLs on LGSs.

B.4.7.3 The remaining 20 SGLs are not located in proximity to an LGS; therefore, no adverse impacts are expected, and a negligible impact has been identified.

B.4.8 Priority habitats

B.4.8.1 Priority habitats recognise a range of habitat types which are deemed most at threat and in need of conservation. Being a fairly rural area, large numbers of priority habitats are distributed throughout South Warwickshire. As a result, the majority of SGLs coincide with areas of priority habitat.

B.4.8.2 A total of 19 SGLs coincide with different forms of priority habitat to varying extents. South Warwickshire, in particular the Stratford-on-Avon District, is heavily wooded with deciduous woodland being found throughout the Plan area, as well as good quality semi-improved grassland, floodplain grazing marsh and traditional orchard being the most frequently occurring along with deciduous woodland. The proportion of coincidence between the SGLs and the priority habitat ranges from approximately 0.1% to 6.7%. South of Coventry SGL has the highest proportion of coincidence at where 6.7% of the SGL overlaps with, and the SGL lies in proximity to, several parcels of floodplain grazing marsh. Overall, a minor negative impact is expected for these 19 SGLs on priority habitat. Cumulative impacts are expected where an overall reduction in priority habitat is anticipated, as well as habitat fragmentation and implications for the wider ecological network.

B.4.8.3 A negligible impact has been identified for the remaining five SGLs as they are not expected to result in significant adverse impacts on priority habitats, including Bishop's Tachbrook, East of Gaydon, East of Lillington, North of Leamington and South of Wellesbourne SGLs. These five SGLs are all located adjacent or in proximity to (but do not coincide with) priority habitat and as such are not anticipated to have any significant adverse effects on the habitat.

Table B.4.1: Assessment of SGLs against SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

SGL no.	Strategic Growth Location	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	LGS	Priority habitat
SG01	South of Coventry	+/-	0	0	--	-	!	-	-

SGL no.	Strategic Growth Location	European sites	SSSI	NNR	Ancient woodland	LNR	LWS	LGS	Priority habitat
SG02	Stoneleigh Park Employment	+/-	0	0	--	0	--	0	-
SG03	Coventry Airport	+/-	-	0	0	-	-	0	-
SG04	South of Kenilworth	+/-	0	0	-	0	-	0	-
SG05	East of Lillington	+/-	0	0	0	-	-	0	0
SG06	North of Leamington	+/-	0	0	0	0	--	-	0
SG07	Wedgnock Park Farm Employment	+/-	0	0	-	0	--	0	-
SG08	West of Warwick	+/-	0	0	0	0	--	0	-
SG09	South of Europa Way	+/-	0	0	-	0	-	0	-
SG10	Bishop's Tachbrook	+/-	0	0	0	0	-	0	0
SG11	South East of Whitnash	+/-	0	0	-	0	--	0	-
SG12	Southam	+/-	0	0	0	0	-	-	-
SG13	Gaydon Lighthorne Heath	+/-	0	0	-	0	--	0	-
SG14	East of Gaydon	+/-	0	0	-	0	--	0	0
SG15	North of Wellesbourne	+/-	0	0	0	0	--	0	-
SG16	South of Wellesbourne	+/-	-	0	-	0	--	0	0
SG17	Shipston-on-Stour	+/-	-	0	0	0	--	0	-
SG18	West of Stratford-upon-Avon	+/-	-	0	-	-	--	-	-
SG19	East of Stratford-upon-Avon	+/-	0	0	0	0	--	0	-
SG20	Bidford-on-Avon	+/-	0	0	0	0	--	0	-
SG21	Alcester	+/-	0	0	-	-	--	0	-
SG22	West of Studley	+/-	-	0	0	0	-	0	-
SG23	North of Henley-in-Arden	+/-	0	0	0	0	--	0	-
SG24	Hockley Heath	+/-	0	0	-	0	--	0	-

B.4.9 Ranking

Best performing	Worst performing
SG10: Bishop's Tachbrook	SG01: South of Coventry
SG05: East of Lillington	SG18: West of Stratford-upon-Avon
SG12: Southam	SG02: Stoneleigh Park Employment
SG04: South of Kenilworth	SG21: Alcester
SG09: South of Europa Way	SG16: South of Wellesbourne

B.4.9.1 Due to the large-scale of proposed development, all 24 SGLs have potential to result in adverse impacts on biodiversity. European sites were not factored into the ranking as the impacts of each SGL on European sites are uncertain at this stage. NNRs were also not factored into the ranking, considering no SLGs are expected to result in significant impacts on NNRs. In some cases, SGLs carry multiple scores for the same biodiversity site which is designated for multiple receptors. For instance, Wellesbourne Wood, located adjacent to the South of Wellesbourne, is also an LWS and comprises areas of priority habitat. This has been taken into account when ranking these SGLs for biodiversity in terms of the relative scale and extent of potential adverse effects.

- B.4.9.2 The **best performing** option for biodiversity is Bishop’s Tachbrook SGL, which lies adjacent to Greys Mallory, a small LWS, and otherwise is not expected to have any further adverse impacts on biodiversity designations. Several other SGLs follow closely behind, including East of Lillington SGL, which lies 1km from Leam Valley and Whitnash Brook LNR, and is located 200m from The Runghills LWS. South of Europa Way SGL lies 30m from Wigerlands Wood ancient woodland, Southam SGL lies adjacent to Southam Bypass Cutting and Southam Cement Quarry LGS, and South of Kenilworth SGL is in proximity to ancient woodland, however this is already surrounded by existing built form. Several other sites are expected to perform similarly with few negative impacts on biodiversity assets, including West of Warwick, Bidford-on-Avon, North of Henley-in-Arden, North of Leamington and North of Wellesbourne SGLs. Although there is potential for adverse impacts on locally designated habitats, these are expected to be minimal, and lesser than impacts from other SGLs on biodiversity.
- B.4.9.3 The **worst performing** option for biodiversity is the South of Coventry SGL, which coincides with several parcels of ancient woodland, areas of LWS and lies adjacent to Gibbet Hill Middle Quarry LGS. The SGL also lies adjacent to the Tocil Wood and Meadow LNR and coincides with areas of priority habitat, including deciduous woodland and a small area of traditional orchard.
- B.4.9.4 Various other SGLs also perform poorly for biodiversity, including the West of Stratford-upon-Avon which is expected to result in minor negative impacts for all biodiversity receptors (besides European sites and NNRs) as well as coinciding with small areas of LWS leading to a potential major negative effect. The Stoneleigh Park Employment SGL coincides with areas of ancient woodland, and the Alcester SGL was also considered to perform poorly for biodiversity as it coincides with areas of LWS and is expected to result in minor negative impacts for ancient woodland, LNRs and priority habitat. The South of Wellesbourne SGL is also located 500m from Loxley Church Meadow SSSI, and subsequently falls into several IRZ which would require consultation with Natural England.

B.4.10 Mitigation potential

- B.4.10.1 In accordance with the mitigation hierarchy, the most effective way to prevent adverse impacts on biodiversity is through avoidance. Given the large geographic scale of the SGLs, where adverse effects have been identified in **Table B.4.1**, this in some cases only relates to certain parcels or small portions of the SGLs that overlap with, or lie in proximity to SSSIs, NNRs, LNRs, LWSs, LGSs, ancient woodland or priority habitat. In order to mitigate the most harmful impacts associated with SGLs on biodiversity designations, the boundaries of the SGLs could be revised to exclude parcels which are more likely to result in adverse impacts on biodiversity, where the rest of the SGL would otherwise be very well situated to accommodate development that reduces potential for direct adverse effects.
- B.4.10.2 At the earliest opportunity, ecological surveys should be undertaken to better understand the current role and value of any on-site or nearby habitats and how the introduction of new development can be best planned within the indicative SGL boundaries to avoid, or mitigate, the potential for adverse effects, or whether there are any locations where development should be avoided entirely.

- B.4.10.3 Where SGLs coincide with small portions of, or lie adjacent to biodiversity designations, a possible course of mitigation to avoid adverse impacts on biodiversity features might involve the incorporation of green buffers at the edges of the built development within the SGL boundaries. This would create an SGL with more integrated GI network for habitats and species, that protects existing habitats and corridors, which is likely to lessen the damage any development associated with the SGLs might inflict. In line with the Building with Nature Standards³, the design of the SGLs should consider ways to best integrate nature and wildlife into the development design and layout to prevent further habitat loss and ecological fragmentation. It is therefore recommended that as with the new settlements, all SGLs also incorporate 40% onsite GI.
- B.4.10.4 Similarly, conserving, enhancing and providing nature recovery networks can generate opportunities for biodiversity to thrive alongside new development. The Warwickshire, Coventry and Solihull Local Nature Recovery Strategy (LNRS)⁴ is currently in progress which aims to improve links and quality of green spaces in urban areas and ensure specific proposals are implemented for improving habitat provision, restoration and connectivity. A focus should be given to conserving existing and creating new networks within development sites, and restoring habitat networks in the wider area.
- B.4.10.5 Whilst development proposals will be expected to meet the requirements of biodiversity net gain (BNG) which would provide an uplift on each development site, many of the habitats recognised within the assessments for biodiversity are considered to be irreplaceable habitats, which must not be destroyed. These habitats include ancient woodland and veteran trees which are present in the SWLP area. If these biodiversity sites are lost to development, they will not regenerate or recover, so it is essential that development is not situated so that these habitats would need removing. The incremental loss or degradation of these irreplaceable habitats would result in serious adverse impacts for which mitigation will not be expected to be sufficient.

³ Building with Nature Standards. Building with Nature. Standards Framework (BwN 2.0) Available at: https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6351513d1afee236d4cf6ce8/1666273600232/Building_with_Nature_Standards_Framework_2.0_Oct22_Download_Version.pdf [Date accessed: 05/11/24]

⁴ Warwickshire, Coventry and Solihull LNRS (2024) Warwickshire, Coventry and Solihull Local Nature Partnership. Available at: <https://wcslnp.wixsite.com/localnature/lnrs> [Date accessed 04/11/24]

B.5 SA Objective 4: Landscape

B.5.1 National Landscapes / Areas of Outstanding Natural Beauty

- B.5.1.1 The Cotswolds National Landscape extends into the southern part of Stratford-upon-Avon district in the SWLP area. The Cotswolds National Landscape consists of rolling hills and villages built from yellow limestone, from which the views experience, and wider landscape setting, have the potential to be affected by some of the SGLs.
- B.5.1.2 The Shipston-on-Stour SGL is likely to impact long-reaching views from the Cotswolds National Landscape. The closest point to of the SGL in the east lies 1.6km from the National Landscape, whilst the southernmost point of the SGL is located approximately 3.2km from the designation. Ebrington Hill is the tallest hill in the Plan area which lies in the south west of the Stratford-on-Avon District with an elevation of 261m. The SGLs in proximity to Ebrington Hill, most notably Shipston-on-Stour, have the potential to impact views from the peak. However, it is worth noting that Shipston-on-Stour is surrounded by built form. Overall, a minor negative impact is expected for Shipston-on-Stour on landscape.
- B.5.1.3 The remaining 23 SGLs are located further away from the Cotswolds National Landscape and as such are not anticipated to have significant adverse impacts on the National Landscape or its setting. A negligible impact has been identified for these 23 SGLs.

B.5.2 Landscape Character Assessment

- B.5.2.1 The Warwickshire Landscape Guidelines 1993 and National Character Area profiles⁵ were used to identify SGLs where the introduction of new development has potential to discord with the surrounding landscape character.
- B.5.2.2 All 24 SGLs were located within the study area, and the majority (all except for Coventry Airport SGL) lie within landscape types where large-scale development is likely to change the character of the surrounding landscape area to some extent.
- B.5.2.3 The Coventry Airport SGL, although situated within the Dunsmore Plateau Fringe Enhancement Zone, is not expected to result in any significant changes to the landscape character. This SGL is located on a brownfield site which is currently developed as an airport, where any further development in this area is not expected to result in significant adverse effects on landscape character.

⁵ Natural England (2014) National Character Area Profiles. Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles> [Date accessed: 15/11/24]

- B.5.2.4 All 23 of the remaining SGLs are identified to have potential for minor negative impacts on the surrounding landscape character. Given the large-scale development proposed within the SGLs, some extend across more than one landscape type. For example, both the North of Wellesbourne and South of Wellesbourne SGLs lie within Feldon Parklands landscape type in the east, which consists of a wooded estate landscape with large-scale rolling topography, and large country houses set in mature parkland. The west of these SGLs lies within the Avon Valley Terrace Farmlands landscape type, which is a flat, intensively farmed open landscape, comprising wooded stream lines on fertile river terrace soils.
- B.5.2.5 Of these 23 SGLs, 12 lie within areas indicated as ‘enhancement zones’ as part of their overarching landscape types. Enhancement zones are strategic priority areas recognised for where they might benefit from further landscape conservation and enhancement. Development within enhancement areas is likely to detract from their conservation goals. For instance, the Stoneleigh Park Employment SGL and North of Leamington SGLs lie within the Arden Parklands landscape type and enhancement zone which is recognised by its presence of ancient woodland, middle distance views enclosed by woodland, and mature parkland including remnant deerparks. The East of Gaydon is situated within the Lias Village Farmlands landscape type and enhancement zone, which is characterised by its varied, undulating topography, well-defined geometric field patterns and disused quarries comprising semi-natural grassland and scrub.

B.5.3 Landscape Sensitivity

- B.5.3.1 Landscape sensitivity has been assessed using the Landscape Sensitivity Assessment of Local Service Villages⁶, Landscape Sensitivity Assessment of Main Settlements including Areas of Restraint Assessment⁷, Landscape Sensitivity, Ecological and Geological Study⁸, and Area of restraint designations in the Stratford Core Strategy. All SGLs which were located in the study area will have potential to result in adverse impacts on sensitive landscapes, where these areas are less resilient to change.
- B.5.3.2 Eight SGLs, including the North of Henley-in-Arden, North of Wellesbourne, Shipston-on-Stour, South of Coventry, Gaydon Lighthorne Heath, Southam, West of Stratford-upon-Avon and West of Studley SGLs, largely coincide with areas of ‘high’ or ‘medium-high’ landscape sensitivity and are therefore expected to result in substantial changes to the surrounding landscape. A major negative impact is likely for these seven SGLs. A further four SGLs, including the Alcester, Bidford-on-Avon, East of Stratford-upon-Avon and South of Wellesbourne SGLs, are partially located in areas of ‘high’ or ‘medium-high’ sensitivity including areas of ‘medium’ and ‘medium-low’, and have potential to result in a minor negative impact on the surrounding landscape.

⁶ White Consultants (2012) ‘Landscape Sensitivity Assessment of Local Service Villages’ Available at <https://www.stratford.gov.uk/planning-building/landscape-and-green-infrastructure.cfm> [Date accessed 15/11/24]

⁷ White Consultants (2011) ‘Landscape Sensitivity Assessment of Main Settlements including Areas of Restraint Assessment’ Available at <https://www.stratford.gov.uk/planning-building/landscape-and-green-infrastructure.cfm> [Date accessed 15/11/24]

⁸ WCC (2013) ‘Landscape Sensitivity, Ecological and Geomorphological Study’ Available at https://www.warwickdc.gov.uk/downloads/file/1549/appendix_7_-_landscape_sensitivity_and_ecological_and_geological_study [Date accessed 15/11/24]

B.5.3.3 The remaining 12 SGLs were not located in the landscape sensitivity assessment area; therefore, the impact associated with these SGLs is uncertain at this stage.

B.5.4 Special Landscape Areas

B.5.4.1 There are four Special Landscape Areas (SLAs) in South Warwickshire which include Arden, Feldon Parkland, Ironstone Hill and Cotswold Fringe.

B.5.4.2 Arden is the largest of these SLAs situated in the western side of the Plan area where six SGLs are located wholly or partially in the SLA. The special qualities of the Arden SLA include small-scale field patterns, ancient woodland, areas of parkland associated with country houses, and small-scale river valleys with narrow floodplains. Alcester, West of Studley and North of Henley-in-Arden SGLs are located wholly within the Arden SLA, all three of which contain a variety of these special qualities and as such have been identified as resulting in a potential major negative impact on the Arden SLA.

B.5.4.3 Some 28% of the Hockley Heath SGL lies within the Arden SLA, where there is potential for development to have an adverse impact on the SLA where some of the landscape area and its associated qualities may be lost. A small proportion of the West of Stratford-upon-Avon SGL coincides with the Arden SLA, and Bidford-on-Avon SGL is located 350m from the Arden SLA. A minor negative impact is identified on the Arden SLA from these three SGLs.

B.5.4.4 The Feldon Parkland SLA is located in the centre of Stratford-on-Avon District and is characterised by large-scale rolling topography with steeper scarp slopes in the north, large woodlands including ancient woodland, a large-scale field pattern and mature parkland associated with country houses. The South of Wellesbourne SGL lies adjacent to the Feldon Parkland SLA where it borders areas of woodland, and Gaydon Lighthorne Heath SGL coincides with a small area to the north east of the SLA which mainly consists of a large open field. As such, these two SGLs could potentially have a minor negative impact on the SLA as it is likely to result in a loss of these key characteristics.

B.5.4.5 The Cotswold Fringe SLA is located towards the southern part of the Plan area consisting of one larger area and one small area. The Cotswold Fringe SLA is characterised by small hills, slopes and valleys, medium to large scale regular field pattern, farmland with pockets of permanent pasture and ridge and furrow, small scale watercourses and unspoilt views to the Feldon Vale and Feldon Parklands. There are no SGLs which coincide with or are in close proximity to the SLA. Shipston-on-Stour SGL is located over 500m away and as the development associated with the SGL would likely be located in and around the existing built-up area it is not anticipated to have any significant adverse impacts on views. As such, a negligible impact on the SLAs has been identified.

B.5.4.6 The Ironstone Hill SLA is located at the eastern edge of the Plan area and consists of one large area and one very small area. The Ironstone Hill SLA is characterised by its rolling landscape with prominent ironstone hills, ridges and slopes, a medium to large scale field pattern, occasional woodland, farmland with pockets of permanent pasture with some ridge and furrow, areas of large inaccessible countryside and unspoilt views of the Feldon Vale. There are no SGLs which coincide or are in close proximity to the SLA. Southam SGL is located approximately 2.5km from the SLA, but lies in and around the existing built up area and as such is not anticipated to have a significant adverse impact on views. Gaydon Lighthorne Heath SGL sits 1.5km away between the Ironstone Hill and Feldon Parkland SLAs, but as much of the SGL is already developed it is not anticipated to have a adverse effect on views from the Ironstone Hill SLA with a negligible impact identified. Therefore, the remaining 15 SGLs including Gaydon Lighthorne Heath, are identified as having a negligible impact given their distance from the four SLAs.

B.5.5 Country Parks

B.5.5.1 There are three Country Parks within the SWLP area, including Burton Dasset in the east of Stratford-on-Avon District, Newbold Comyn to the east of the town of Warwick, and Ryton Pools of which approximately one-third of the park is within the north east of Warwick District.

B.5.5.2 Some 22 of the SGLs are not situated in proximity to country parks and as such negligible impacts have been identified. Although West of Studley SGL is located 1.6km from Arrow Country Park, it is not likely to impact views where the CP is situated in a valley, and the proposed development at West of Studley SGL is separated from the CP by built form within Studley itself.

B.5.5.3 The remaining two SGLs have potential to impact views from country parks in the SWLP area. East of Gaydon SGL is located approximately 2.6km from Burton Dasset Country Park and is expected to impact long-reaching views, and East of Lillington SGL is located adjacent to Newbold Comyn Country Park. The likely large-scale development at these SGLs will have potential to interrupt views from the country parks and may compromise any high-quality viewing experiences or setting of the parks. As such, these three SGLs have been identified as having a minor negative impact on country parks.

B.5.6 Views from the Public Right of Way network

B.5.6.1 The Public Rights of Way (PRoW) extends across the Plan area through the urban settlements and more widely through the countryside. No national trails are located in South Warwickshire.

B.5.6.2 Coventry Airport is the only SGL which is not anticipated to have an adverse impact on views from the PRoW network, due to the existing industrial-type development present at this SGL. As such any development within the Coventry Airport SGL will not be anticipated to cause any further harmful effects, and a negligible impact has been identified.

B.5.6.3 The remaining 23 SGLs are anticipated to have negative impacts associated with changes to the current rural and countryside views experienced by users of the PRoW network.

B.5.7 Coalescence

- B.5.7.1 Development within the SGLs has potential to contribute to the reduced separation or merging of settlements, and loss of their distinctive character and identity. Given their large scale, over half of the SGLs are likely to contribute to coalescence between settlements.
- B.5.7.2 For 13 of the SGLs there are anticipated to be adverse impacts as a result of increased coalescence between settlements in South Warwickshire. Seven of these SGLs including Bidford-on-Avon, Gaydon Lighthorne Heath, Hockley Heath, North of Leamington, North of Wellesbourne, South East of Whitnash and West of Studley are anticipated to result in increased coalescence between small settlements such as between Wilmcote, Bearley, Bidford-on-Avon, Hatton, Hockley Heath and other small settlements. The remaining six SGLs including Bishop’s Tachbrook, East of Lillington, South of Coventry, South of Kenilworth, Wedgnock Park Farm Employment and West of Stratford-upon-Avon are expected to result in increased coalescence between small settlements and larger urban areas in South Warwickshire such as Leamington Spa, Stratford-upon-Avon, Kenilworth, Warwick and Coventry. Therefore, these 13 SGLs have been identified as having a minor negative impact on coalescence.
- B.5.7.3 Of the remaining 11 SGLs, nine are located away from existing settlements and as such are not expected to result in adverse impacts on coalescence. These SGLs include Coventry Airport, East of Gaydon, East of Stratford-upon-Avon, North of Henley-in-Arden, Shipston-on-Stour, South of Europa Way, South of Wellesbourne, Southam and West of Warwick. A negligible impact is expected for these nine SGLs.
- B.5.7.4 Additionally, Alcester and Stoneleigh Park Employment SGLs are located close to other settlements but are unlikely to result in coalescence where there are buffers which would prevent the spread of development. Alcester SGL is unlikely to lead to coalescence due to the swathes of woodland located to the west of the SGL which will maintain a separation between Alcester and surrounding villages. Stoneleigh Park Employment SGL is located close to Kenilworth, but is separated by Kenilworth Golf Club. This creates a buffer between the SGL and nearby settlements which will be expected to prevent coalescence. Therefore, negligible impacts have also been identified for these two SGLs.

Table B.5.1: Assessment of SGLs against SA Objective 4: Landscape

SGL no.	Strategic Growth Location	National Landscape / AONB	Landscape Character Assessment	Landscape Sensitivity	Special Landscape Areas	Country Parks	Views from PProW network	Coalescence
SG01	South of Coventry	0	-	--	0	0	-	-
SG02	Stoneleigh Park Employment	0	-	+/-	0	0	-	0
SG03	Coventry Airport	0	0	+/-	0	0	0	0
SG04	South of Kenilworth	0	-	+/-	0	0	-	-
SG05	East of Lillington	0	-	+/-	0	-	-	-
SG06	North of Leamington	0	-	+/-	0	0	-	-

SGL no.	Strategic Growth Location	National Landscape / AONB	Landscape Character Assessment	Landscape Sensitivity	Special Landscape Areas	Country Parks	Views from PRoW network	Coalescence
SG07	Wedgnoek Park Farm Employment	0	-	+/-	0	0	-	-
SG08	West of Warwick	0	-	+/-	0	0	-	0
SG09	South of Europa Way	0	-	+/-	0	0	-	0
SG10	Bishop's Tachbrook	0	-	+/-	0	0	-	-
SG11	South East of Whitnash	0	-	+/-	0	0	-	-
SG12	Southam	0	-	--	0	0	-	0
SG13	Gaydon Lighthorne Heath	0	-	--	-	0	-	-
SG14	East of Gaydon	0	-	+/-	0	-	-	0
SG15	North of Wellesbourne	0	-	--	0	0	-	-
SG16	South of Wellesbourne	0	-	-	-	0	-	0
SG17	Shipston-on-Stour	-	-	--	0	0	-	0
SG18	West of Stratford-upon-Avon	0	-	--	-	0	-	-
SG19	East of Stratford-upon-Avon	0	-	-	0	0	-	0
SG20	Bidford-on-Avon	0	-	-	-	0	-	-
SG21	Alcester	0	-	-	--	0	-	0
SG22	West of Studley	0	-	--	--	0	-	-
SG23	North of Henley-in-Arden	0	-	--	--	0	-	0
SG24	Hockley Heath	0	-	+/-	-	0	-	-

B.5.8 Ranking

Best performing	Worst performing
SG03: Coventry Airport	SG22: West of Studley
SG08: West of Warwick	SG23: North of Henley-in-Arden
SG09: South of Europa Way	SG18: West of Stratford-on-Avon
SG02: Stoneleigh Park	SG01: South of Coventry
SG19: East of Stratford-upon-Avon	SG21: Alcester

B.5.8.1 Given the sensitive landscapes present within South Warwickshire and the surrounding area, as well as the large-scale of development proposed, the majority of SGLs will be likely to result in negative impacts for landscape. The Cotswolds National Landscape was given more weighting in the ranking, considering its importance as a national designation for its distinctive landscape character.

B.5.8.2 Coventry Airport is considered to be the **best performing** option overall for landscape, where it is not likely to result in any adverse impacts on any landscape receptors. It is the only SGL where the majority is located on previously developed land, is not close to any landscape designations, and is already surrounded by built form.

- B.5.8.3 The West of Warwick SGL is also expected to have minimal impacts on landscape. Although the SGL is expected to result in alterations to the Arden Wooded Estatelands character area, it is comprised of strong borders regarding the surrounding urban area, Warwick Racecourse and the A46. Three further SGLs including South of Europa Way, Stoneleigh Park and East of Stratford-upon-Avon are expected to alter views from the PRoW network, however few other impacts are expected for these SGLs on landscape.
- B.5.8.4 It is worth noting that similar levels of impact are also expected for the East of Gaydon, south of South East of Whitnash, Bishop’s Tachbrook, Wedgnock Park Farm Employment, North of Leamington and South of Kenilworth SGLs.
- B.5.8.5 The West of Studley SGL is expected to be the **worst performing** option. It is expected to have the largest number of negative impacts on landscape, where it is expected to result in significant adverse effects on landscape sensitivity and is wholly situated in the Arden SLA. Numerous other impacts are also expected on views from PRoW networks, alteration in landscape character and increased coalescence between Studley and a number of smaller settlements.
- B.5.8.6 The North on Henley-in-Arden SGL also performs poorly for landscape where it is also situated in areas of high landscape sensitivity and wholly within the Arden SLA. Shipston-on-Stour SGL is likely to impact views from the Cotswolds National Landscape, South of Coventry SGL will create coalescence between Coventry and Kenilworth, and Alcester SGL is also located wholly within the Arden SLA. It is noted that various other SGLs are also likely to result in a similar level of adverse impacts on landscape, including North of Wellesbourne, Bidford-on-Avon and Gaydon Lighthorne Heath.

B.5.9 Mitigation potential

- B.5.9.1 East of Lillington SGL is located adjacent to Newbold Comyn Country Park where new development could potentially have a negative impact on the views and recreational experience of users of the park. However, there is the potential for mitigation where the proposed development could incorporate an extension of the country park into the SGL as part of the GI provision. There may be opportunities for similar larger-scale greenspace provisions alongside other SGLs that should be explored by the Councils, to maintain and improve public access to areas for outdoor recreation, as well as help to integrate development into the wider landscape.
- B.5.9.2 Avoiding negative effects should be the priority for addressing potential impacts of development on landscape. For example, excluding the southern portion of the ‘Jaguar Land Rover, Gaydon’ parcel at Gaydon Lighthorne Heath SGL would reduce likelihood of direct adverse effects on the Felon Parkland SLA. The exclusion of parcels can also be used to reduce potential for coalescence, for instance, reducing development on the southernmost parcels in the South of Coventry SGL to maintain a gap between settlements.

- B.5.9.3 With regard to the PRow networks, there may be the potential to mitigate some negative impacts where views from these pathways could be significantly changed through the introduction of new development. Developers will need to carefully design the layout of developments to seamlessly incorporate existing and new PRow networks. For instance, incorporating GI buffers and multi-use active travel corridors within development can break up urban form associated with the built environment. Undertaking Landscape and Visual Impact Assessments (LVIAs) when at the appropriate design stage can help to identify, and then plan for, the maintenance and enhancement of key views within the developments.
- B.5.9.4 Development proposed as part of the SGLs should also be informed by appropriate landscape surveys, including a Landscape Sensitivity Assessment (LSA). An LSA is the process of assessing the resilience, or robustness of landscape character and the visual resource (and valued characteristics) to defined change or changes arising from development proposals. It can help decision makers to understand likely changes and the nature of change should the development scenarios be taken forward.
- B.5.9.5 A number of SGLs which are likely to result in adverse impacts on landscape character areas also fall within landscape enhancement areas, where it is recommended that development in these areas is designed so that it positively contributes to the enhancement of the local landscape character. It is also advised that as development progresses to planning application stages, it should be informed by an LVIA which will identify visual impacts the development may have on the local landscape.
- B.5.9.6 In order to ensure any proposed development is in-keeping with the setting of existing development and the wider landscape, relevant design guidance should be consulted. The Warwickshire Design Guide⁹ seeks to provide architects and developers with direction and guidance through which they can ensure development is appropriate to the setting of surrounding landscape features, such as through considering the choice of building materials, implementing a cohesive layout and consideration of building height. Under Draft Policy Direction 26 – Design Codes, the South Warwickshire Councils are intending to develop design codes reflecting site and settlement specifics that will be helpful in this regard.

⁹ Warwickshire County Council (2024) Warwickshire Design Guide. Available at:
<https://www.warwickshire.gov.uk/warwickshiredesignguide> [Date accessed: 05/11/24]

B.6 SA Objective 5: Cultural Heritage

B.6.1 Grade I Listed Buildings

- B.6.1.1 South Warwickshire contains 99 Grade I Listed Buildings (LBs) distributed across the Plan area with higher concentrations found in the built-up areas including in Warwick, Stratford-on-Avon and Kenilworth. The majority of the SGLs are not expected to have any significant impact on the setting of Grade I LBs.
- B.6.1.2 South East of Whitnash SGL coincides with ‘Chesterton Windmill’, a Grade I Listed 17th century stone tower with a windmill. The windmill is a public attraction drawing in visitors, residents and walkers who can appreciate the surrounding views and rural setting of the Listed Building. As such, a major negative impact has been identified for South East of Whitnash SGL on Grade I LBs.
- B.6.1.3 Four SGLs are anticipated to have minor negative impacts on Grade I LBs where the development has potential to harm the wider setting of the heritage asset. Bishop’s Tachbrook and North of Wellesbourne SGLs are both expected to alter views and the wider setting of churches, including ‘Church of Saint Chad’ in Bishop’s Tachbrook and ‘Church of St Leonard’ in Charlecote. Stoneleigh Park Employment SGL is located 200m from ‘Stoneleigh Abbey’ and its gatehouses. The rich history associated with this Grade I LBs including close associations with the writings of Jane Austen, could potentially be significantly harmed through development surrounding the Abbey, its associated outbuildings and gardens. Additionally, the West of Stratford-upon-Avon SGL is situated 250m from ‘Anne Hathaway’s Cottage’, the childhood home of the wife of William Shakespeare, which will be anticipated to alter the wider setting of the Grade I LBs.

B.6.2 Grade II* Listed Buildings

- B.6.2.1 Grade II* LBs are well distributed across the SWLP area with higher concentrations in the urban centres including Warwick, Royal Leamington Spa and Stratford-on-Avon, with 268 in total. A total of 19 SGLs are not situated in areas where they are likely to affect the setting of a Grade II* LBs, or the building itself and as such have been identified as resulting in a negligible impact.
- B.6.2.2 Three of the SGLs are anticipated to have an adverse impact on the setting of Grade II* LBs. Shipston-on-Stour SGL sits 100m from the ‘Church of St Edmund’, and South of Wellesbourne SGL sits 70m from the ‘Church of St Peter’ from which views from the church could be altered, as well as from the parcels sitting adjacent to the cemetery associated with the churchyard. Wedgnock Park Farm Employment SGL sits 200m from ‘Woodloes Farmhouse’, which would impact views from the house and farmhouse with change from an agricultural landscape to a built up one. These SGLs are located within the setting of various Grade II* LBs and as such could potentially have adverse impacts on views and character of these heritage assets. Therefore, minor negative impacts have been identified for these three SGLs.

B.6.2.3 There are two SGLs where proposed development associated with the SGLs is anticipated to have a major negative impact on Grade II* LBs. Hockley Heath SGL is situated adjacent to 'Christ Church Baptist Church'. The land surrounding this LB is predominantly woodland and agricultural land which would be significantly altered through the development of the 'Land South of Spring Lane' parcel of the SGL. Stoneleigh Park Employment SGL is located adjacent to the 'Stables and Riding School 100 yards northeast of Stoneleigh Abbey'. Hockley Heath and Stoneleigh Park Employment SGLs are therefore identified as having potential major negative impacts on Grade II* LBs due to potential significant alterations to the settings of these heritage assets.

B.6.3 Grade II Listed Buildings

B.6.3.1 There are 4,804 Grade II LBs in the SWLP area, with higher concentrations found within the built-up areas, particularly in Warwick, Kenilworth, Royal Leamington Spa, Stratford-upon-Avon and Alcester, as well as in rural settlements. Given the abundance of Grade II LBs within the Plan area, a larger number are likely to be affected by SGLs than for Grade I and Grade II* LBs. However, five SGLs including Coventry Airport, East of Gaydon, East of Lillington, North of Leamington and West of Warwick, are not situated in proximity to Grade II LBs and as such are not expected to result in significant effects to any buildings or their settings. Negligible impacts have been identified for these five SGLs on Grade II LBs.

B.6.3.2 Seven SGLs are likely to be located within the setting of a Grade II LB. North of Wellesbourne SGL is situated in close proximity to multiple Grade II LBs in Charlecote, predominantly residential dwellings including 'Bambi Cottage', and 'The Vicarage and the Glebe'. Shipston-on-Stour SGL sits in proximity to multiple Grade II LBs in the centre of Shipston-on-Stour town; these are not anticipated to be significantly affected by new development, as these heritage assets are already surrounded by built-up areas. However, 'Fell Hill Farmhouse' sits further out of Shipston-on-Stour town and as such the extensive development associated with the SGL to the east of the town is expected to affect the setting of this asset, potentially altering the surrounding landscape and views from the farmhouse. South of Kenilworth SGL sits 80m from 'Wotton Grange Farmhouse' at the 'Land West of Warwick Road' parcel, which is anticipated to impact the setting of the farmhouse through altering the surrounding landscape. South of Wellesbourne, West of Stratford-upon-Avon and West of Studley SGLs are all situated in proximity to several Grade II LBs with potential to alter their settings. Wedgnock Park Farm Employment SGL is situated 200m from 'Prospect Farmhouse', 'South Barn', and 'Woodloes Farmhouse' which is anticipated to harm the setting of these heritage assets resulting in significant alterations to the surrounding landscape. Therefore, these seven SGLs have been identified as having minor negative impacts on the setting of Grade II LBs.

B.6.3.3 Eight SGLs (Bidford-on-Avon, Bishop's Tachbrook, East of Stratford-upon-Avon, Gaydon Lighthorne Heath, Hockley Heath, South East of Whitnash, South of Europa Way and Southam) are adjacent to Grade II LBs where development could significantly alter their setting through changes to the surrounding landscape and impacts on views. For example, Bishop's Tachbrook SGL surrounds the Grade II Listed 'Barn approximately 30m northwest of Newhouse Farmhouse' on all sides; development on the current arable fields is anticipated to significantly alter the setting of the barn with changes to the surrounding landscape and views. As such, these eight SGLs have been identified as having major negative impacts on the setting of Grade II LBs.

B.6.3.4 Four SGLs (Alcester, North of Henley-in-Arden, South of Coventry and Stoneleigh Park Employment) coincide with Grade II LBs where there is potential for development to significantly alter the surrounding landscape setting and views of these heritage assets. Alcester SGL coincides with three Grade II LBs including 'Cold Comfort Farmhouse' and its associated barns. North of Henley-in-Arden SGL coincides with 'Crocketts Farmhouse', whilst the proposed development also surrounds 'Beaudesert Park'. South of Coventry SGL coincides with 'Cryfield Farmhouse', 'Cryfield Grange. As such, these four SGLs have also been identified as having a potential major negative impact on Grade II LBs.

B.6.4 Registered Parks and Gardens

B.6.4.1 Registered parks and gardens (RPGs) are distributed across the SWLP area, with a higher concentration in Warwick District. Most SGLs are not anticipated to have an adverse impact on the setting of RPGs as they are not located in proximity to these heritage assets.

B.6.4.2 Two of the SGLs, Gaydon Lighthorne Heath and South of Wellesbourne are expected to have a minor negative impact on RPGs given the development would likely be located within the setting of these heritage assets. Gaydon Lighthorne Heath SGL is situated 400m from Compton Verney RPG, and South of Wellesbourne SGL is situated 250m from Charlecote Park RPG, where it is likely that development will alter the setting of the surrounding landscape including views from the RPGs. Minor negative impacts have been identified for these two SGLs.

B.6.4.3 Five SGLs are located adjacent or very close to RPGs and are therefore more likely to significantly alter their setting. Alcester SGL is situated 10m from Ragley Hall RPG; although they are separated by the A422 there is still expected to be significant change to the surrounding landscape including through the loss of some countryside views. North of Wellesbourne SGL is located adjacent to Charlecote Park RPG which is expected to impact the rural setting and views to the western side of the RPG. South East of Whitnash SGL is located adjacent to Mallory Court RPG, surrounding the RPG on three sides, and as such is anticipated to significantly alter the surrounding landscape and views particularly from the south and eastern parts of the SGL. South of Europa Way SGL includes 'Park Farm, Warwick', a land parcel which is situated adjacent to Warwick Castle RPG and is expected to significantly alter the setting to the south of the RPG, as well as result in the loss of countryside views from the castle. Part of Stoneleigh Park Employment SGL lies adjacent to Stoneleigh Abbey RPG on two sides, with a portion of the 'Stoneleigh Road' parcel wholly coinciding with the RPG and as such is expected to significantly alter the setting of Stoneleigh Abbey and views of the grounds from the abbey itself. As a result, these five SGLs have been identified as having a potential major negative impact on RPGs and their setting.

B.6.5 Conservation Areas

B.6.5.1 Conservation Areas (CAs) are areas of special architectural or historic interest which contain many listed buildings and scheduled monuments. These are concentrated in the northern part of the SWLP area, within Warwick District. Three of the SGLs, including East of Gaydon, Wedgnoek Park Farm, and West of Studley are not expected to have any significant impact on the conservation areas in and around the Plan area as they are located away from CAs.

- B.6.5.2 A total of 21 SGLs are anticipated to have a negative impact on conservation areas as a result of proximity or coincidence. Nine SGLs are located in proximity to CAs ranging from a distance of 5m to 780m including Coventry Airport, East of Lillington, East of Stratford-upon-Avon, Gaydon Lighthorne Heath, Hockley Heath, South East of Whitnash, South of Kenilworth, Stoneleigh Park Employment and West of Stratford-upon-Avon SGLs, where the proposed development will be anticipated to have an impact on the wider setting and views from the CAs such as from Baginton CA, Cubbington CA and Lapworth CA, amongst others. Six SGLs are located adjacent to CAs, such as Arrow CA, Royal Leamington Spa CA and Warwick CA. These include Alcester, North of Leamington, South of Coventry, South of Europa Way and West of Warwick SGLs, where new development is anticipated to impact their setting and surroundings.
- B.6.5.3 Six of the SGLs including Bishop's Tachbrook, North of Henley-in-Arden, North of Wellesbourne, Shipston-on-Stour, South of Wellesbourne and Southam all contain, or partially coincide with, CAs including Bishop's Tachbrook CA, Southam CA and Bearley CA, amongst others. Coincidence with CAs will be expected to have a negative impact on CA as development may result in the loss of land which holds historical and/or cultural value, as well as extensive development significantly altering the surrounding landscape and views from the CA. A minor negative impact has been identified for these 21 SGLs.
- B.6.5.4 The proposed development at the remaining three SGLs including Wedgnoek Park Farm Employment, East of Gaydon and West of Studley is not anticipated to result in adverse effects on CAs and as such a negligible impact has been identified for these three sites.

B.6.6 Scheduled Monuments

- B.6.6.1 Scheduled monuments (SMs) recognise nationally important archaeological sites. There are 128 SMs in and around the Pan area which have the potential to be affected by the SGLs. The majority of the SGLs are not anticipated to have any significant impact on the SMs in and around South Warwickshire as they are located away from these heritage assets. As such, negligible impacts have been identified for these 18 SGLs.
- B.6.6.2 Three SGLs are likely to be located in within the setting of an SM. Gaydon Lighthorne Heath SGL is situated 350m from the 'Roman Villa north of Ireland Farm' SM which occupies an elevated position south of the village of Gaydon. As such, the proposed development with this SGL is anticipated to have an adverse impact on the setting and views from the SM. South of Wellesbourne SGL is located 20m from 'Enclosures 600 yards east of King's Mead' SM and as such is anticipated to have an adverse impact on the setting of the monument. Stoneleigh Park Employment SGL is located 350m from the 'Roman settlement at Glasshouse Wood' SM and as such is anticipated to have an adverse impact on the setting and surroundings of this SM. These three SGLs have consequently been identified as having minor negative impacts on SMs.

B.6.6.3 Of the remaining three SGLs, South of Coventry lies adjacent to the medieval moated site of ‘Brockenden Grange’ SM where development has potential to significantly alter the setting of the SM as well as the loss of wooded and rural views from the monument. North of Wellesbourne SGL coincides with the ‘Cursus and Bowl Barrow 450m south east of Jackson’s Barn’ and ‘Enclosures 600 yards east of King’s Mead’ SMs, where development has potential to result in significant harm to their integrity and setting. South East of Whitnash SGL coincides with the ‘Roman rural settlement at Windmill Hill Farm’ SM, taking up a considerable portion of the SGL. The development associated with this site is anticipated to have significant adverse effects on this SM, altering its integrity and setting. For these three SGLs, major negative impacts have been identified given the extent of proposed development on the character and setting of SMs.

Table B.6.1: Assessment of SGLs against SA Objective 5: Cultural Heritage

SGL no.	Strategic Growth Location	Grade I Listed Buildings	Grade II* Listed Buildings	Grade II Listed Buildings	Registered Parks and Gardens	Conservation Areas	Scheduled Monuments
SG01	South of Coventry	0	0	--	0	-	--
SG02	Stoneleigh Park Employment	-	--	--	--	-	-
SG03	Coventry Airport	0	0	0	0	-	0
SG04	South of Kenilworth	0	0	-	0	-	0
SG05	East of Lillington	0	0	0	0	-	0
SG06	North of Leamington	0	0	0	0	-	0
SG07	Wednock Park Farm Employment	0	-	-	0	0	0
SG08	West of Warwick	0	0	0	0	-	0
SG09	South of Europa Way	0	0	--	--	-	0
SG10	Bishop’s Tachbrook	-	0	--	0	-	0
SG11	South East of Whitnash	--	0	--	--	-	--
SG12	Southam	0	0	--	-	-	0
SG13	Gaydon Lighthorne Heath	0	0	--	-	-	-
SG14	East of Gaydon	0	0	0	0	0	0
SG15	North of Wellesbourne	-	0	-	--	-	--
SG16	South of Wellesbourne	0	-	-	-	-	-
SG17	Shipston-on-Stour	0	-	-	0	-	0
SG18	West of Stratford-upon-Avon	-	0	-	0	-	0
SG19	East of Stratford-upon-Avon	0	0	--	0	-	0
SG20	Bidford-on-Avon	0	0	--	0	-	0
SG21	Alcester	0	0	--	--	-	0
SG22	West of Studley	0	0	-	0	0	0
SG23	North of Henley-in-Arden	0	0	--	0	-	0
SG24	Hockley Heath	0	--	--	0	-	0

B.6.7 Ranking

Best performing	Worst performing
SG14: East of Gaydon	SG11: South East of Whitnash

Best performing	Worst performing
SG06: North of Leamington	SG02: Stoneleigh Park Employment
SG03: Coventry Airport	SG15: North of Wellesbourne
SG05: East of Lillington	SG21: Alcester
SG22: West of Studley	SG03: Gaydon Lighthorne Heath

- B.6.7.1 The majority of SGLs are anticipated to result in adverse impacts on cultural heritage, primarily due to the large scale of development proposed. Some SGLs are likely to result in a greater number of, and more severe, adverse impacts than others. Given that Grade I Listed Buildings are considered to of “*exceptional interest*” and therefore of higher significance when compared to Grade II* being of “*more than special interest*”, and Grade II to being of “*special interest*”¹⁰, a higher weighting has therefore been given for SGLs with potential to lead to adverse impacts on Grade I Listed Buildings in the ranking.
- B.6.7.2 The **best performing** option for heritage assets is identified as the East of Gaydon SGL. This SGL is located away from all designated heritage assets and is therefore not expected to result in any significant adverse impacts on known cultural heritage. For multiple other SGLs, impacts on cultural heritage are expected to be minimal. East of Lillington, North of Leamington and Coventry Airport SGLs all lie adjacent or in proximity to conservation areas, whereas West of Studley lies in proximity to Grade II Listed Buildings. Additionally, West of Warwick SGL lies adjacent to a conservation area. No other direct impacts relating to heritage assets are expected for these SGLs.
- B.6.7.3 The **worst performing** option of the SGLs on cultural heritage is South East of Whitnash. Chesterton Windmill Grade I Listed Building lies within the southeast of the SGL. The SGL also coincides with Roman Rural Settlement at Windmill Hill Farm SM, as well as being adjacent to multiple Grade II Listed Buildings and Mallory Court RPG; it is less likely that adverse effects on cultural heritage assets could be avoided or mitigated at this SGL compared to the others.
- B.6.7.4 Various other SGLs are also likely to result in multiple impacts on heritage assets. The Stoneleigh Park Employment SGL is located 200m away from Grade I Listed Building Stoneleigh Abbey, lies 200m from the associated Grade II* Listed Stableyards and Riding School. The SGL also coincides with Grade II Listed Building East Lodge, and lies in proximity to multiple others. The SGL is surrounded by the Stoneleigh Abbey RPG, although the area which is likely to impact the RPG is already developed. North of Wellesbourne SGL is also likely to result in impacts on all types of heritage assets, with the exception of Grade II* Listed Buildings, including being located adjacent to Charlecote Park RPG. Alcester SGL coincides with three Grade II Listed buildings, and Gaydon Lighthorne Heath SGL is located in close proximity to a Grade II* Listed Building, and adjacent/in proximity to over 25 Grade II Listed Buildings. It should also be noted that South of Wellesbourne SGL is also likely to result in minor negative impacts to all types of heritage assets besides Grade I Listed Buildings, and Hockley Heath SGL lies adjacent to multiple Grade II* and II Listed buildings.

¹⁰ Historic England (2024). What are Listed Buildings? Available at: <https://historicengland.org.uk/listing/what-is-designation/listed-buildings/> [Date accessed: 22/10/24]

B.6.8 Mitigation potential

- B.6.8.1 In accordance with the mitigation hierarchy, the first means by which impacts of heritage assets should be prevented is through avoidance. It is the case for many of the cultural heritage receptors that they coincide with only small parcels of the SGLs. Where possible, it is recommended that the parcels coinciding with heritage assets are excluded from their respective SGL. Not only would this prevent the need for further levels of mitigation as development progresses, but it would ensure the SGLs are best positioned to minimise impacts on heritage assets whilst also working to conserve South Warwickshire's historic environment. This would however be dependent on the extent of the settings of different heritage assets, as the distance by which significant adverse impacts could occur can depend on the significance and role of the heritage assets in the local area¹¹.
- B.6.8.2 Within Hockley Heath SGL, the removal of the 'Land South of Spring Lane' parcel which sits adjacent to 'Umberslade Baptist Church' could reduce the harmful impacts on this Grade II* Listed Building. The 'Land at Fell Hill Farm' parcel of Shipston-on-Stour SGL could be removed to prevent impacts on Fell Hill Farmhouse. Additionally in order to prevent adverse impacts on Grade II Listed Building 'Wooton Grange Farmhouse', the 'Land West of Warwick Road' parcel of South of Kenilworth SGL could be excluded.
- B.6.8.3 The 'Park Farm' parcel of South of Europa Way SGL sits adjacent to Warwick Castle RPG. In order to reduce the extent of impacts on the historic environment from this SGL, this parcel could be excluded.
- B.6.8.4 Bishop's Tachbrook SGL is adjacent to Bishop's Tachbrook CA on two sides, however through excluding the 'Land North of The Leopard Inn' parcel of the SGL this has the potential to help mitigate impacts on the CA. South of Wellesbourne could have 'Lowes Lane/ Walton Road and Land South of Charlecote Road' parcels excluded to minimise any adverse impact on Wellesbourne CA. Two small parcels of the Southam SGL, 'Land at Oxford Street' and 'Wood Street Car Park', could be excluded from the SGL to remove or lessen impact as the Southam CA is already surrounded by built up areas.
- B.6.8.5 North of Wellesbourne SGL could remove the parcels to the west of the A429, the University of Warwick Wellesbourne Campus, which would prevent adverse impacts on the SMs it coincides with as much of this parcel remains undeveloped.

¹¹ Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3. Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heaq180-gpa3-setting-heritage-assets/> [Date accessed: 14/11/24]

- B.6.8.6 Where avoidance is not possible, impacts on heritage assets can be minimised through designing development in a way which is appropriate to their setting. By referring to the Warwickshire Design Guide¹² developers can ensure development is sensitive to local distinctiveness, as well as respecting surroundings in terms of scale, height, form and massing. In addition, historic distinctiveness can be maintained such as by using high-quality, local materials for development whilst incorporating any architectural significance. GI and green buffers should also be integrated into new development, particularly where current open spaces or undeveloped areas are integral to the setting of heritage assets or offer important viewing opportunities of historic landmarks. The layout and design of new developments should also work to ensure heritage assets are respected and enhanced, to ensure the significance and value of the historic environment in SWLP area preserved.
- B.6.8.7 Mitigation of adverse impacts on South Warwickshire’s historic environment should be informed by heritage impact assessments. Archaeological surveys should also be undertaken to determine if there are any potential archaeological assets or areas of interest which may be sensitive to development. It is also recommended that any proposed development should be informed by appropriate available information, and further surveys carried out where necessary, which will support the conservation and enhancement of the archaeological environment in and around South Warwickshire, for instance undertaking LVIA’s and LVAs which consider views of and from heritage assets.
- B.6.8.8 Increasing the appreciation of heritage assets can ensure their importance is safeguarded for future generations, as well as encouraging developers to consider the conservation and enhancement of heritage assets within site and building design. For instance, providing information boards for listed buildings and scheduled monuments promotes education relating to local history, as well as giving context to the historical use of such assets which require preservation.

¹² Warwickshire County Council (2024) Warwickshire Design Guide. Available at:
<https://www.warwickshire.gov.uk/warwickshiredesignguide> [Date accessed: 05/11/24]

B.7 SA Objective 6: Pollution

B.7.1 Air Quality Management Area

- B.7.1.1 There are four Air Quality Management Areas (AQMAs) located in the SWLP area: Warwick, Jury Street AQMA, Leamington AQMA, Studley AQMA and Stratford-upon-Avon AQMA. In addition, Coventry AQMA lies adjacent to the north of the Plan area. Excess emissions are already present in these areas, where air quality objectives are unlikely to be met and require further management and monitoring. Situating development within 200m of an AQMA is likely to expose site end users to higher levels of air pollutants, as well as contribute to an increase in emissions in the designation, such as through increased vehicular usage, congestion and urban form. The majority of SGLs in the SWLP area are located over 200m from an AQMA.
- B.7.1.2 Of the four SGLs which are located within 200m of an AQMA, East of Stratford-upon-Avon and West of Stratford-upon-Avon SGLs slightly coincide with Stratford-upon-Avon AQMA. In addition, the SGLs located at Coventry Airport and South of Coventry lie adjacent to the Coventry AQMA. By locating development close to or within an AQMA, emissions are likely to increase in these areas, particularly nitrogen dioxide which these AQMAs are designated for. These SGLs are more likely to expose site end users to higher levels of air pollutants, putting them at greater risk of a range of diseases such as asthma, heart disease and cancer. As a result, these four SGLs are likely to result in a minor negative impact on air pollution within AQMAs.
- B.7.1.3 The remaining 20 SGLs are located over 200m from an AQMA, and are therefore not expected to expose site end users to existing sources of air pollution. A negligible impact is expected for these SGLs on air quality. However, it should be noted that new development can give rise to increased traffic flows and potentially indirect effects on air quality within AQMAs; further investigation and assessment would be needed to confirm any potential for such effects.

B.7.2 Main road

- B.7.2.1 The SWLP area contains of a number of major roads, the most notable being the M40 running from the north west to south east. Where SGLs are located within 200m of a main road (motorway or A Road), this is expected to expose site end users in these areas to higher levels of transport associated air and noise pollution.
- B.7.2.2 A total of 20 SGLs are located where part of the SGL area lies within 200m of a main road. This includes the Bishop's Tachbrook, East of Gaydon, Gaydon Lighthorne Heath and South of Europa Way SGLs which all lie within 200m of the M40. The remaining 16 SGLs are located within 200m of various A Roads. These 20 SGLs are expected to have a minor negative impact on pollution and exposure to poor air quality for main roads.
- B.7.2.3 On the other hand, four SGLs including Bidford-on-Avon, East of Lillington, South East of Whitnash and South of Kenilworth are located over 200m from a main road; therefore, a negligible impact is expected for these four SGLs.

- B.7.2.4 An increase in vehicles as a result of new, large-scale development is likely to increase congestion and traffic-related emissions on these roads, as well as contributing to noise pollution. Further investigation and assessment would be needed to confirm the potential for and scale of such effects.

B.7.3 Railway line

- B.7.3.1 Several railway lines run through South Warwickshire connecting the Plan area to London and the Cotswolds in the south, as well as north to Birmingham, Leicester and beyond. In addition, construction of the proposed HS2 railway cuts through the South of Coventry and Stoneleigh Park Employment SGLs, and runs adjacent to the Southam SGL, although this has not been factored into the assessments at this stage. Where SGLs lie within 200m of a railway line, site end users are expected to experience higher levels of noise pollution and vibrations. The majority of SGLs do not lie within close proximity of a railway line.
- B.7.3.2 A total of five SGLs are located within 200m of a railway line. Three of the SGLs including North of Leamington, South East of Whitnash and West of Warwick are situated adjacent to railway lines. This will be expected to have adverse impacts on the SGLs through increasing exposure to air pollution and disturbance. The remaining two SGLs, North of Henley-in-Arden and West of Stratford-upon-Avon, have railway lines running through the SGLs. A minor negative impact has therefore been identified for these five SGLs.
- B.7.3.3 The remaining 19 SGLs are not located in proximity to a railway lines, and are not expected to result in adverse impacts in relation to pollution from railways; therefore, a negligible impact is anticipated for these 19 SGLs.

B.7.4 Groundwater Source Protection Zone

- B.7.4.1 Groundwater Source Protection Zones (SPZs) have been identified to indicate where sources of drinking water may be most at risk to sources of contamination. South Warwickshire contains several SPZs ranging from SPZ1 to SPZ3. The majority of the SGLs are not anticipated to have an adverse impact on SPZs as they are not located within these zones.
- B.7.4.2 A total of three SGLs have potential to lead to an adverse impact on SPZs. The majority of North of Leamington SGL coincides with SPZ3, which will be anticipated to result in potential contamination of groundwater as a result of the large capacity of 2,978 homes proposed in the development of this SGL. The southern portion of South of Coventry SGL is located in SPZ3. This SGL is proposed for a capacity of 4,621 homes and mixed-use development which is expected to have an adverse impact on the SPZ from residential, industrial and commercial occupation. Approximately half of Stoneleigh Park Employment SGL is situated within SPZ3 where it is possible to cause contamination from the construction and occupation of employment-led development. As a result, these three SGLs have been identified as having a minor negative impact on groundwater.
- B.7.4.3 The remaining 21 SGLs do not coincide with SPZs and are therefore unlikely to result in any significant adverse impacts of groundwater quality. As a result, a negligible impact has been identified.

B.7.5 Watercourses

- B.7.5.1** Several watercourses run through South Warwickshire including the River Avon, River Arrow, River Leam, the River Stour and their tributaries. Development in proximity to watercourses could result in pollution and impact upon the bed and banks of watercourses and reduce water quality. The majority of SGLs are anticipated to have an adverse impact on watercourses within and around the Plan area.
- B.7.5.2** Three of the SGLs contain areas which are located less than 200m from watercourses: the River Avon at Bidford-on-Avon SGL; River Alne at North of Henley-in-Arden SGL; and the Cain Brook at West of Studley SGL. Eight of the SGLs are adjacent to watercourses, which are anticipated to result in greater potential for an adverse impact (Stoneleigh Park Employment, West of Warwick, Bishop’s Tachbrook, South East of Whitnash, Southam, South of Wellesbourne, South of Kenilworth and Hockley Heath SGLs). Seven SGLs also coincide with watercourses (Alcester, East of Gaydon, Gaydon Lighthorne Heath, North of Wellesbourne, Shipston-on-Stour, South of Coventry, and West of Stratford-upon-Avon). For example, of these SGLs, North of Wellesbourne SGL coincides with the River Dene which directly through the centre of the SGL. The proposed development associated with the SGLs will have greater potential to cause harm to the quality of watercourses, such as the River Avon, the River Dene, Gran Brook and the River Stour, among others. An increased number of pollutants entering the watercourses from residential and employment related development, as well as potential impact during the construction of these SGLs which could result in changes to a watercourses natural pathway, blockages from debris and construction materials and other possible pollutants is expected. Therefore, for these 18 SGLs minor negative impacts have been identified for their likely effects on watercourses.
- B.7.5.3** Six of the SGLs are less likely to significantly adversely affect the watercourses as they are located beyond 200m from watercourses. As a result, Coventry Airport, East of Lillington, East of Stratford-upon-Avon, North of Leamington, South of Europa Way and Wedgnock Park Farm Employment SGLs have been identified as having a negligible impact. However, each development site would need to be evaluated according to land use type, size of development and exact location. The proposed development at all SGLs has the potential to lead to adverse impacts such as those resulting from runoff.

Table B.7.1: Assessment of SGLs against SA Objective 6: Pollution

SGL no.	Strategic Growth Location	AQMA	Main road	Railway line	Groundwater SPZ	Watercourse
SG01	South of Coventry	-	-	0	-	-
SG02	Stoneleigh Park Employment	0	-	0	-	-
SG03	Coventry Airport	-	-	0	0	0
SG04	South of Kenilworth	0	0	0	0	-
SG05	East of Lillington	0	0	0	0	0
SG06	North of Leamington	0	-	-	-	0
SG07	Wedgnock Park Farm Employment	0	-	0	0	0
SG08	West of Warwick	0	-	-	0	-
SG09	South of Europa Way	0	-	0	0	0

SGL no.	Strategic Growth Location	AQMA	Main road	Railway line	Groundwater SPZ	Watercourse
SG10	Bishop's Tachbrook	0	-	0	0	-
SG11	South East of Whitnash	0	0	-	0	-
SG12	Southam	0	-	0	0	-
SG13	Gaydon Lighthorne Heath	0	-	0	0	-
SG14	East of Gaydon	0	-	0	0	-
SG15	North of Wellesbourne	0	-	0	0	-
SG16	South of Wellesbourne	0	-	0	0	-
SG17	Shipston-on-Stour	0	-	0	0	-
SG18	West of Stratford-upon-Avon	-	-	-	0	-
SG19	East of Stratford-upon-Avon	-	-	0	0	0
SG20	Bidford-on-Avon	0	0	0	0	-
SG21	Alcester	0	-	0	0	-
SG22	West of Studley	0	-	0	0	-
SG23	North of Henley-in-Arden	0	-	-	0	-
SG24	Hockley Heath	0	-	0	0	-

B.7.6 Ranking

Best performing	Worst performing
SG05: East of Lillington	SG18: West of Stratford-on-Avon
SG07: Wedgnoek Park Farm Employment	SG01: South of Coventry
SG09: South of Europa Way	SG08: West of Warwick
SG04: South of Kenilworth	SG02: Stoneleigh Park Employment
SG20: Bidford-on-Avon	SG06: North of Leamington

B.7.6.1 Adverse effects related to pollution have been identified for the majority of SGLs, although some SGLs are expected to result in greater adverse impacts than others. All impacts on pollution were considered equally when identifying the best and worst performing options.

B.7.6.2 The **best performing** option for pollution is identified as the East of Lillington SGL. The SGL is located away from all pollution receptors assessed under SA Objective 6, and is the only SGL where no adverse impacts have been identified. Various other SGLs are expected to have a small number of impacts on pollution, and so could be seen as the next best performing. South of Kenilworth and Bidford-on-Avon SGLs are located less than 200m away from watercourses, whilst the Wedgnoek Park Farm Employment and South of Europa Way SGLs are located less than 200m from main roads. No other adverse impacts are expected for these SGLs, although it is worth noting all SGLs have potential for downstream impacts on water quality, and the generation of air pollution.

- B.7.6.3 The **worst performing** option for pollution is the West of Stratford-on-Avon SGL. The SGL lies less than 200m from the Stratford-on-Avon AQMA, where a small portion coincides; it also lies adjacent to two A Roads where these lead into the town centre and hence could worsen existing poor air quality within the AQMA. Additionally, a railway line and Drayton Brook watercourse run through the SGL, whilst also lying adjacent to the canal.
- B.7.6.4 Several other SGLs are also expected to result in a number of adverse impacts on pollution. These include the South of Coventry which lies adjacent to the Coventry AQMA and an A Road. The southern portion of the SGL also coincides with an area of SPZ3, whilst several brooks run through the site. Additionally, the majority of the West of Warwick SGL lies within 200m buffers of main roads, watercourses and railway lines, where scope for avoidance for pollution related impacts is small. Similarly, Stoneleigh Park Employment SGL is located where most of the SGL area is within 200m buffers for main roads and watercourses, and a large area in the northern half of the SGL coincides with SPZ3. The North of Leamington SGL also runs adjacent to A roads, railways, lies within an area of SPZ3 and is located approximately 250m from the River Avon. It is also worth noting that the North of Henley-in-Arden SGL performs similarly, lying adjacent to a main road, a railway and a watercourse.

B.7.7 Mitigation potential

- B.7.7.1 In line with the mitigation hierarchy the primary means through which impacts relating to pollution should be prevented is through avoidance. Several of the SGLs have small parcels which coincide with a receptor resulting in adverse impacts. In order to mitigate these, one cause of action is to eliminate these parcels of the SGLs, or to ensure that built development is not located in these areas. For example, West of Stratford-upon-Avon SGL has two parcels, 'Land at Burton Farm' and 'Land at Stratford Parkway Railway Station', which could be excluded to prevent or reduce adverse impacts of noise pollution and disturbance from railway lines, North of Leamington SGL could also exclude 'Land North of Leamington Spa' parcel, and South East of Whitnash SGL could omit 'Land North of Harbury Lane and South of Gold Lane' parcel which would lessen adverse impacts from railway lines. With regard to SPZs, proportions of Stoneleigh Park Employment SGL that lie within an SPZ could be omitted including 'Land South of Dalehouse Lane', 'Land at Stoneleigh Park', 'Kingswood Business Park' and 'Land East of A46' which would reduce adverse impacts on groundwater quality.
- B.7.7.2 It is recommended that SGLs located within 200m of an AQMA or a main road directs residential uses and other pedestrian areas away from these receptors, to limit exposure to air pollutants. Prior to development, air and noise impact assessments and strategies should be undertaken for SGLs which are likely to result in impacts on health through exposure to pollution.
- B.7.7.3 All SGLs are likely to increase traffic and associated air pollution to some extent; it is recommended that more detailed assessments are carried out to consider the implications of SGLs on the surrounding road networks and potential for contributions to worsened air quality in AQMAs.

- B.7.7.4 Technological advances including the increased use of electric and low emissions vehicles will be expected to mitigate some adverse impacts, particularly regarding air quality such as through reducing emissions of harmful pollutants such as NO₂ and particulate matter. Renewable technologies and increased energy / water efficiency measures could also further mitigate harmful impacts on air and water quality through increasing the sustainable use of resources and minimising emissions. In addition, allocating SGLs which are best situated to support the 20-minute neighbourhoods concept is likely to reduce congestion and reliance of private vehicular use, and subsequently reduce emissions.
- B.7.7.5 Increasing levels of GI across the Plan area, as well as integrating nature-based solutions (see EA guidance¹³) to minimise flood risk, will also have the potential to mitigate harmful impacts associated with the proposed development of the SGLs on the water environment. The various ecosystem service functions associated with a greater canopy cover, species-rich hedgerows, open green spaces and green roofs, among others, will strengthen the provision of benefits for air and water filtration, which have the potential to help mitigate adverse impacts on air quality and watercourses.

¹³ Environment Agency (2021). Use nature-based solutions to reduce flooding in your area. Available at: <https://www.gov.uk/guidance/use-nature-based-solutions-to-reduce-flooding-in-your-area>. [Date accessed: 11/11/2024]

B.8 SA Objective 7: Natural Resources

B.8.1 Best and most versatile land

- B.8.1.1 The SWLP area primarily comprises Grade 3 soil according to the Agricultural Land Classification (ALC), with smaller areas of Grade 2 and Grade 4 soil being distributed throughout the Plan area. Soil of Grades 1, 2 and Subgrade 3a are considered to be the 'Best and Most Versatile' (BMV) soils, which have the highest versatility and suitability for growing crops, as well as contributing to ecosystem services. It is unknown whether the Grade 3 land in South Warwickshire falls into Subgrade 3a or 3b; therefore a precautionary approach has been taken and potential BMV land has been assessed as Grades 1, 2 and 3.
- B.8.1.2 A total of 23 SGLs contain over 20ha of potential BMV land and are have potential to result in the loss of high-quality agricultural land and associated ecosystem services. For instance, South of Europa Way SGL comprises 321ha and is wholly situated on land classed as Grade 2 and 3, which may result in the loss of a significant amount of BMV land. The proposed development at these 23 SGLs therefore has potential to result in a major negative impact on BMV soils.
- B.8.1.3 The remaining SGL, Coventry Airport, is situated on previously developed land. Focusing development within this SGL will help prevent the loss of BMV land elsewhere across the Plan area; therefore, a minor positive impact has been identified for this SGL on BMV land.

B.8.2 Mineral Safeguarding Areas

- B.8.2.1 Sterilisation of mineral resources can occur where development is situated on, or close to, the boundary of a resource. Using data supplied by the British Geological Survey, Warwickshire County Council has mapped Mineral Safeguarding Areas (MSA) in the county which encompasses the entirety of the Plan area¹⁴. The SWLP area primarily consists of unconsolidated sand and gravel, building stone, areas of brick clay in Warwick District, and raw cement in Stratford-on-Avon District where small areas of crushed rock also exist in the south and southeastern border.
- B.8.2.2 The majority of SGLs (23) have potential to result in adverse impacts on an MSA. This includes nine SGLs (West of Warwick, East of Lillington, East of Stratford-upon-Avon, North of Wellesbourne, South of Kenilworth, Alcester, Coventry Airport, Southam and Stoneleigh Park Employment), which all wholly coincide with an MSA that contains unconsolidated sand and gravel resources. Alternatively, Southam Group wholly coincides with an MSA supporting raw cement. The Alcester, West of Warwick, Southam and Stoneleigh Park Employment SGLs also contain areas of building stone, whilst Stoneleigh Park contains an area of brick clay. Some 14 SGLs partially coincide with MSAs, where similarly a minor negative impact is identified.
- B.8.2.3 The remaining SGL, East of Gaydon, lies wholly outside of all MSAs. A negligible impact has therefore been identified for the East of Gaydon SGL.

¹⁴ Warwickshire County Council (2024) Minerals Local Plan Map. Available at: <https://www.warwickshire.gov.uk/minerals-local-plan-1> (Date accessed: 30/10/24)

Table B.8.1: Assessment of SGLs against SA Objective 7: Natural Resources

SGL no.	Strategic Growth Location	BMV land	MSA
SG01	South of Coventry	--	-
SG02	Stoneleigh Park Employment	--	-
SG03	Coventry Airport	+	-
SG04	South of Kenilworth	--	-
SG05	East of Lillington	--	-
SG06	North of Leamington	--	-
SG07	Wedgcock Park Farm Employment	--	-
SG08	West of Warwick	--	-
SG09	South of Europa Way	--	-
SG10	Bishop's Tachbrook	--	-
SG11	South East of Whitnash	--	-
SG12	Southam	--	-
SG13	Gaydon Lighthorne Heath	--	-
SG14	East of Gaydon	--	0
SG15	North of Wellesbourne	--	-
SG16	South of Wellesbourne	--	-
SG17	Shipston-on-Stour	--	-
SG18	West of Stratford-upon-Avon	--	-
SG19	East of Stratford-upon-Avon	--	-
SG20	Bidford-on-Avon	--	-
SG21	Alcester	--	-
SG22	West of Studley	--	-
SG23	North of Henley-in-Arden	--	-
SG24	Hockley Heath	--	-

B.8.3 Ranking

Best performing	Worst performing
SG03: Coventry Airport	SG20: Bidford-on-Avon
SG14: East of Gaydon	SG06: North of Leamington
SG18: West of Stratford-Upon-Avon	SG02: Stoneleigh Park Employment
SG13: Gaydon Lighthorne Heath	SG15: North of Wellesbourne
SG22: West of Studley	SG01: South of Coventry

B.8.3.1 The large-scale of proposed development is expected to result in the depletion of large areas of BMV soil and potential sterilisation of mineral resources within MSAs. The majority of sites which coincide with MSAs that protect unconsolidated sand and gravel, which forms the majority of safeguarded minerals in the Plan area and therefore exists in abundance, covering a large geographic area beyond the SGL boundaries. As such, when considering the best and worst performing SGLs for natural resources, less weighting has been placed on those which coincide with unconsolidated sand and gravel MSAs.

- B.8.3.2 Coventry Airport is identified as the **best performing option** for natural resources, as although the SGL coincides with an MSA, it will not result in any loss of BMV soil or agricultural land. The subsequent best performing options have been identified where the land lost consists predominantly of urban, Grade 4 and Grade 3 ALC land or for East of Gaydon where this site does not coincide with any MSAs. This is expected to result in less severe adverse impacts than development on Grade 2 ALC land, which is more likely to represent BMV land.
- B.8.3.3 Bidford-on-Avon SGL is identified as the **worst performing option** as the majority of the SGL consists of Grade 2 ALC land, some of the most valuable agricultural land in South Warwickshire. The majority of the SGL also coincides with an MSA. Following this, the subsequent worst performing options are identified where a large proportion of these are coincident with Grade 2 and Grade 3 ALC land, as well as where the SGL coincides with MSAs.

B.8.4 Mitigation potential

- B.8.4.1 The loss of agricultural land is considered to be permanent and has very little scope for mitigation, as construction damages soil through excavation, compaction, erosion, pollution and contamination. Wherever possible, development should be prioritised on areas of previously developed land. However, as the SWLP area and proposed SGLs mainly consist of greenfield land and BMV soils, excluding large parcels of the most valuable BMV soil (Grades 1 and 2) from development may be the most viable way of reducing impacts related to the loss of high-quality agricultural land. For example, the South of Wellesbourne SGL covers areas of Grades 2 and 3 soil, as well as urban land. By excluding parcels such as the 'East of Ettington Road' and 'Land North of Moreton Morrell Road', development of the highest quality Grade 2 classified soil can be avoided. Ideally, parcels of Grade 3 land including 'Land South of Loxley Road' would also be excluded.
- B.8.4.2 Considering development is still likely to result in the loss of a large proportion of Grade 3 soil, soil and agricultural land quality surveys can be used to identify the grade of agricultural land as Grade 3a or 3b, in accordance with the ALC criteria as published by Natural England¹⁵. This can be carried out as a two-step process, firstly undertaking desk studies of published soil, geological, flood risk and climate information, and subsequently undertaking fieldwork to assess the site and soil conditions, usually involving digging soil pits or auger borings. This can be incorporated into an Environmental Impact Assessment (EIA) or a standalone soil assessment. As highlighted in IEMA's 'A New Perspective on Land and Soil in Environmental Impact Assessment' (2022)¹⁶, although it is not possible to entirely mitigate the loss of agricultural land to a development, it is possible to mitigate the displacement of soils. Where it is not possible to wholly avoid built development in areas with high-value soils, the collection of soil data should allow the magnitude of potential impacts relating to the site-specific temporary or permanent displacement of soils to be assessed.

¹⁵ Natural England (2017) Provisional Agricultural Land Classification (ALC). Available at: <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::provisional-agricultural-land-classification-alc-england/about> [Date accessed: 15/11/24]

¹⁶ IEMA (2022) Launch of New IEMA Guidance on Land and Soils. Available at: <https://www.iema.net/resources/blogs/2022/02/17/iema-launch-of-new-eia-guidance-on-land-and-soils-february-2022/> [Date accessed: 05/11/24]

- B.8.4.3 It is recommended that good practice guidance is followed regarding soil handling, to ensure that opportunities for on-site and off-site re-use of soils are explored that best maintain soil functions, for example DEFRA's 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' (2009)¹⁷.
- B.8.4.4 Soils are an essential resource for ecosystem services including nutrient cycling and water filtration. Although human-made methods cannot fully compensate for the loss of soils and their biomass functions, processes such as water filtration can be partially mitigated through the implementation of SuDS and GI. Retaining areas of undeveloped land and developing GI networks is essential for ensuring effective surface water drainage and prevent soil erosion, whilst maintaining ecological networks which contribute to soil functions.
- B.8.4.5 Additionally, where the loss of BMV soil is unavoidable, there should be careful consideration taken to the layout and design of the development where valuable soil resources should be used for the integration of GI, open spaces or the use of community allotments. This would prevent the loss of high quality land which can be well protected and utilised for GI and open space provision, recreation and growing food.
- B.8.4.6 As with BMV land, avoidance should be prioritised to prevent the sterilisation of MSAs. However, considering the majority of SGLs coincide with MSAs including nine which wholly coincide, scope for avoidance is minimal. Liaison with the minerals authority (Warwickshire County Council) will be required to determine whether there are particular locations within MSAs that may be the most viable for extraction, to ensure these areas remain protected. This may lead to certain SGLs being recommended for exclusion.
- B.8.4.7 Minerals with surface deposits can be extracted using opencast methods, which involve excavating overlying rock to access mineral resources. For instance, sand and gravel are made up of surface deposits and cover a large proportion of the SWLP area. These require on-site soil conservation for the land to remain viable, where sites have been identified for minerals extraction of this nature in the Warwickshire Minerals Plan¹⁸. Development within SGLs must ensure this will not limit the transportation and storage of minerals around these areas, particularly where this coincides with MSAs.

¹⁷ DEFRA (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Available at: <https://assets.publishing.service.gov.uk/media/5b2264ff40f0b634cfb50650/pb13298-code-of-practice-090910.pdf> [Date accessed: 05/11/24]

¹⁸ Warwickshire County Council (2018) Warwickshire Minerals Plan. Available at: <https://www.warwickshire.gov.uk/mineral-waste-plans/minerals-development-framework> [Date accessed: 30/10/24]

B.9 SA Objective 8: Waste

B.9.1 Potential increase in household waste generation

- B.9.1.1 Residential-led and mixed-use development is likely to result in a significant increase in household waste generation. Any development with a capacity of over 641 dwellings in Stratford-on-Avon District or 707 dwellings in Warwick District is expected to lead to an approximate increase in household waste generation of more than 1% compared to the current figures for the district in which it is located.
- B.9.1.2 All 21 residential-led and mixed-use SGLs have a capacity for over 641 dwellings in Stratford-on-Avon or 707 dwellings in Warwick and are therefore expected to increase waste in the Plan area by more than 1%. In particular, the North of Wellesbourne SGL has a capacity for 9,221 dwellings which has potential to increase waste in the Stratford-on-Avon by more than 12%. A major negative impact is therefore expected for these 21 SGLs.
- B.9.1.3 The remaining three SGLs are proposed for employment use, including Coventry Airport, Stoneleigh Park Employment and Wedgnock Park Farm Employment SGLs. Although it is likely these SGLs will generate waste, the extent and nature of this waste is currently unknown. The impact is uncertain for these SGLs.

Table B.9.1: Assessment of SGLs against SA Objective 8: Waste

SG no.	Strategic Growth Location	Potential increase in household waste generation
SG01	South of Coventry	--
SG02	Stoneleigh Park Employment	+/-
SG03	Coventry Airport	+/-
SG04	South of Kenilworth	--
SG05	East of Lillington	--
SG06	North of Leamington	--
SG07	Wedgnock Park Farm Employment	+/-
SG08	West of Warwick	--
SG09	South of Europa Way	--
SG10	Bishop's Tachbrook	--
SG11	South East of Whitnash	--
SG12	Southam	--
SG13	Gaydon Lighthorne Heath	--
SG14	East of Gaydon	--
SG15	North of Wellesbourne	--
SG16	South of Wellesbourne	--
SG17	Shipston-on-Stour	--
SG18	West of Stratford-upon-Avon	--
SG19	East of Stratford-upon-Avon	--
SG20	Bidford-on-Avon	--
SG21	Alcester	--
SG22	West of Studley	--
SG23	North of Henley-in-Arden	--

SGL no.	Strategic Growth Location	Potential increase in household waste generation
SG24	Hockley Heath	--

B.9.2 Ranking

- B.9.2.1 All 24 SGLs with residential capacity are expected to result in significant adverse impacts on waste. However, a thorough ranking exercise has not been possible, where the assessment is based on limited data solely relating to their housing capacities. The indicative capacity of each of the SGLs would be the only information available to inform the ranking, potentially introducing bias by assuming waste generation will increase with the number of new homes. Additionally, three of the SGLs are proposed for employment-led use and as such the production of waste associated with each of these SGLs is not known.
- B.9.2.2 Based off the limited information available, the **best performing** option would be identified as South of Europa Way SGL which has a capacity for 823 homes, and the **worst performing** option would be identified as North of Wellesbourne SGL, which has a proposed capacity of 9,221 homes.

B.9.3 Mitigation potential

- B.9.3.1 The high housing capacities attributed to the SGLs limit the potential for waste generation to be effectively reduced. However, the Warwickshire Waste Plan¹⁹ has outlined mechanisms for managing and reducing waste in the county, which is primarily associated with behavioural solutions. These include previous targets to reuse, recycle or compost at least 50% household waste by 2020, such as through diverting municipal waste from landfill for recycling, composting or energy recovery purposes. Through providing suitable facilities for waste disposal, such as integrating recycling facilities into accessible locations, the SWLP can encourage residents and businesses to engage with behaviours that seek to minimise waste production. The careful location and integration of waste solutions, as well as the layout of new neighbourhoods, can also help to improve efficiency for waste collection and management, and reduce HGV movements.
- B.9.3.2 Industrial and commercial waste can also be reduced to some extent. Life-cycle assessments can be undertaken to minimise waste production from the construction, occupancy, and the potential future demolition of development. Efficient use of materials, as well as re-use of any existing buildings and materials where possible, should be considered to prevent excess waste from construction, as well as considering waste from end-of-life demolition. To improve effectiveness, policies relating to waste should be accompanied by metrics which will enable the transparent measurement, and subsequently the management and reduction, of waste in the SWLP area.

¹⁹ Warwickshire County Council (2013) Warwickshire Waste Core Strategy. Available at: <https://api.warwickshire.gov.uk/documents/WCCC-680-279>. [Date accessed: 23/10/24]

B.10 SA Objective 9: Housing

B.10.1 Housing provision

- B.10.1.1 Residential-led and mixed-use development SGLs are likely to result in a net gain in housing. SGLs which have been identified as having capacity for 100 or more dwellings are expected to make a significant contribution towards meeting housing needs if developed, and result in a major positive impact on housing provision.
- B.10.1.2 All 21 SGLs proposed for residential-led or mixed-use are expected to provide a minimum of approximately 823 homes. Notably, North of Wellesbourne SGL has capacity for approximately 9,221 homes which has potential to deliver over one-sixth of the total housing need for the Plan period. Consequently, these 21 SGLs will result in a major positive impact on housing.
- B.10.1.3 The remaining three SGLs are proposed for employment use: Coventry Airport, Stoneleigh Park Employment and Wedgnoek Park Farm Employment SGLs. A negligible impact is expected for these SGLs on housing provision.

Table B.10.1: Assessment of SGLs against SA Objective 9: Housing

SGL no.	Strategic Growth Location	Housing provision
SG01	South of Coventry	++
SG02	Stoneleigh Park Employment	0
SG03	Coventry Airport	0
SG04	South of Kenilworth	++
SG05	East of Lillington	++
SG06	North of Leamington	++
SG07	Wedgnoek Park Farm Employment	0
SG08	West of Warwick	++
SG09	South of Europa Way	++
SG10	Bishop's Tachbrook	++
SG11	South East of Whitnash	++
SG12	Southam	++
SG13	Gaydon Lighthorne Heath	++
SG14	East of Gaydon	++
SG15	North of Wellesbourne	++
SG16	South of Wellesbourne	++
SG17	Shipston-on-Stour	++
SG18	West of Stratford-upon-Avon	++
SG19	East of Stratford-upon-Avon	++
SG20	Bidford-on-Avon	++
SG21	Alcester	++
SG22	West of Studley	++
SG23	North of Henley-in-Arden	++
SG24	Hockley Heath	++

B.10.2 Ranking

- B.10.2.1 All 21 SGLs with indicated residential capacities will be expected to support the delivery of housing in the SWLP area, helping to meet the identified need. However, this assessment is limited by the data available, such as a lack of information regarding the extent of affordable, accessible or range of different sized homes to be provided within each SGL. Subsequently, these SGLs have not been fully ranked for housing, to avoid introducing bias which may assume that a greater number of houses directly correlates with providing homes to suit a wider range of needs.
- B.10.2.2 Based off the limited information available, the **worst performing** option would be identified as South of Europa Way SGL which has a capacity for 823 homes, and the **best performing** option would be identified as North of Wellesbourne, which has a proposed capacity of 9,221 homes.

B.10.3 Mitigation potential

- B.10.3.1 No negative impacts have been identified in relation to housing, however developers need to ensure these numbers reflect a range housing types to cater for the varied needs of residents, as well as providing high quality and appropriately sized homes. This includes provision for affordable housing, supported living, single and multiple occupancy homes, homes which cater for accessibility requirements, and land for Gypsy and Traveller use, ultimately ensuring the widest possible range of benefits for different community members.
- B.10.3.2 Developers must ensure that any proposed development has been designed to align with the Warwickshire Design Guide²⁰ and any emerging design codes as highlighted in Draft Policy Direction 26 – Design Codes (see **Appendix E**). Housing of high-quality design and layout should also be integrated within developments, ensuring it blends with the local character, landscape, heritage features and distinctive setting of South Warwickshire.

²⁰ Warwickshire County Council (2024) Warwickshire Design Guide. Available at:
<https://www.warwickshire.gov.uk/warwickshiredesignguide> [Date accessed: 07/11/24]

B.11 SA Objective 10: Health

B.11.1 Access to NHS hospital with Accident & Emergency department

- B.11.1.1 Warwick Hospital is located in the centre of Warwick, and provides an accident and emergency (A&E) department. Other nearby hospitals with A&E departments include Alexandra Hospital, situated 300m west of the Stratford-on-Avon District boundary, Horton General Hospital situated 5.5km south east of the Stratford-on-Avon boundary, and University Hospital Coventry located 5.1km north of the Warwick District boundary.
- B.11.1.2 A total of 17 SGLs are located outside of the sustainable distance of 5km to a hospital with an A&E service. This includes Shipston-on-Stour as the furthest SGL from an A&E service, being located approximately 19km from Horton General Hospital. The proposed development at these 17 SGLs has potential to result in a minor negative impact on access to emergency healthcare.
- B.11.1.3 Of the remaining seven SGLs, two are located partially within 5km of Warwick Hospital (Bishop's Tachbrook and South of Europa Way). These SGLs all contain parcels of land which sprawl outwards from the urban area and are located over 5km from the nearest hospital, such as 'Land East of Oakley Wood' parcel at Bishop's Tachbrook SGL. However, over 50% of the land at these SGLs still lies within a sustainable distance to Warwick Hospital. A further five SGLs are located wholly, or almost wholly, within 5km of a hospital with A&E services. These include the Wedgnock Farm Park, West of Warwick, North of Leamington and South of Kenilworth SGLs, all of which are located within 5km of Warwick Hospital. Additionally, West of Studley SGL is located within 5km of Alexandra Hospital. A major positive impact is therefore expected for these seven SGLs.

B.11.2 Access to GP surgery

- B.11.2.1 There are 40 GP surgeries with the SWLP area, largely located in the Leamington Spa urban area, whereas the rest are more sparsely located across Warwick, Stratford-upon-Avon and the rural settlements.
- B.11.2.2 It is worth noting that the assessment does not factor in current or future capacities for healthcare provision, which may result in GPs having an inadequate capacity to uptake new patients even where these GP surgeries lie within a sustainable distance from SGLs.
- B.11.2.3 A total of 20 SGLs are located where less than 30% of the SGL lies within a sustainable distance of 800m from a GP surgery, including 10 SGLs which lie wholly outside of the sustainable distance buffer. A minor negative impact is expected for these 20 SGLs.
- B.11.2.4 Of the remaining four SGLs, Shipston-on-Stour and Southam SGLs are located where approximately 47% of these SGLs lie within 800m of an existing GP surgery. As part of these development proposals are within a sustainable distance to a GP surgery, a minor positive impact is expected for these SGLs. In addition, the over 50% of the East of Lillington SGL lies within 800m of Cubbington Road Surgery and the newly built Valley Road Medical Practice, whilst the majority of Bishop's Tachbrook SGL lies within 800m of Croft Medical Centre. Consequently, a major positive impact is expected for this SGL on access to GP surgeries.

B.11.3 Access to leisure facilities

- B.11.3.1 There are a total of 10 council-owned leisure centres located in the SWLP area, including Meadow Community Sports Centre and newly commissioned facilities at Castle Park in Kenilworth, Newbold Comyn Leisure Centre in Leamington Spa, and St Nicholas Park Leisure Centre in Warwick. The remaining six leisure centres are spread throughout the Stratford-on-Avon District, including Stratford Leisure Centre located in the town centre of Stratford-upon-Avon. The majority of SGLs are located outside of the 1.5km sustainable distance to a leisure facility.
- B.11.3.2 A total of 18 SGLs are located wholly outside of 1.5km of a leisure facility, the furthest being the North of Henley-in-Arden SGL which lies 7.5km from Studley Leisure Centre. As these 18 SGLs are located outside of a sustainable distance to a leisure facility, a minor negative impact is expected.
- B.11.3.3 Two SGLs including East of Lillington and Alcester are situated where between 30-50% of the SGL lies within 1.5km of a leisure centre. As a result, the proposed development at these three SGLs has potential to result in a minor positive impact on access to leisure facilities.
- B.11.3.4 The remaining four SGLs are located where over 50% of the SGL lies within 1.5km of a leisure facility. These include South of Wellesbourne SGL which is located 300m from Wellesbourne Sports and Community Centre, Shipston-on-Stour SGL where the closest point is located 50m from Shipston Leisure Centre, and Southam SGL where the nearest point is located 300m away from Southam Leisure Centre. Additionally, the West of Studley SGL is located wholly within the 1.5km sustainable distance from Studley Leisure Centre, and 650m away at its closest point. The proposed development at these four SGLs has potential to result in a major positive impact on access to leisure facilities.

B.11.4 Access to greenspace

- B.11.4.1 Greenspaces are distributed throughout the SWLP area, where these are more densely located within the urban areas of Stratford-upon-Avon, Warwick and Leamington Spa. These include parks, allotments, playing fields and sports facilities. The majority of SGLs are located in proximity to a greenspace access point.
- B.11.4.2 The East of Gaydon and South of Europa Way SGLs are wholly situated over 800m from an access point to an existing public or local greenspace. This locates site end users outside of a sustainable distance to greenspaces, therefore potentially limiting the associated physical and mental health benefits of outdoor recreation. A minor negative impact is therefore expected for these two SGLs for access to greenspace.
- B.11.4.3 A total of four SGLs are located where between 30-50% of the SGL lies within 800m of an existing greenspace, including the Gaydon Lighthorne Heath, North of Wellesbourne, South East of Whitnash and Stoneleigh Park Employment SGLs. These SGLs are likely to provide residents with good access to outdoor space and a diverse range of natural habitats. Some areas of SGLs provide better opportunities for access to greenspace than others, for example the northernmost area of the South East of Whitnash SGL lies adjacent to the Whitnash Recreation Ground, whereas the southernmost area lacks access to any designated greenspace. A minor positive impact is expected for these four SGLs on access to greenspace.

B.11.4.4 The remaining 18 parcels are located where over 50% of the SGL lies within 800m of a greenspace access point. This includes three SGLs which lie wholly within 800m. For instance, East of Lillington SGL is located in close proximity to Mason Avenue Park, the Champion Hills Allotments, Newbold Comyn Country Park, Cubbington Waterworks Play Area and Cubbington Village Hall Play Area. The North of Leamington and West of Warwick SGLs are also wholly located in proximity to a variety of greenspaces including parks, cemeteries, golf courses and children’s play areas. As a result, these 18 SGLs are likely to have a major positive impact on access to existing greenspaces for site end users.

B.11.5 Access to PRow / cycle path

B.11.5.1 Access to Public Rights of Way (PRow) and cycle routes provides site end users with good pedestrian and cycle access to local facilities, as well as encouraging sustainable and active forms of travel. All SGLs are located within the sustainable distance of 600m to a PRow and/or cycle path.

B.11.5.2 The proposed development at the majority of SGLs currently overlaps with the PRow network, besides the South of Europa Way where PRows lie in close proximity to the eastern area of the SGL, and Coventry Airport where most of the SGL instead lies within 600m of a cycle path. Notably, three SGLs are located where 80-100% of the SGL lies within 600m of both a PRow and cycle path. These include the West of Studley, West of Warwick and the East of Stratford-upon-Avon SGLs. Overall, all 24 SGLs are likely to result in a minor positive impact on access to the PRow and cycle networks.

Table B.11.1: Assessment of SGLs against SA Objective 10: Health

SGL no.	Strategic Growth Location	NHS hospital	GP surgery	Leisure facilities	Green-space	PRow / cycle
SG01	South of Coventry	-	-	-	++	+
SG02	Stoneleigh Park Employment	-	-	-	+	+
SG03	Coventry Airport	-	-	-	++	+
SG04	South of Kenilworth	++	-	-	++	+
SG05	East of Lillington	-	++	+	++	+
SG06	North of Leamington	++	-	-	++	+
SG07	Wednock Park Farm Employment	++	-	-	++	+
SG08	West of Warwick	++	-	-	++	+
SG09	South of Europa Way	++	-	-	-	+
SG10	Bishop’s Tachbrook	++	++	-	++	+
SG11	South East of Whitnash	-	-	-	+	+
SG12	Southam	-	+	++	++	+
SG13	Gaydon Lighthorne Heath	-	-	-	+	+
SG14	East of Gaydon	-	-	-	-	+
SG15	North of Wellesbourne	-	-	-	+	+
SG16	South of Wellesbourne	-	-	++	++	+
SG17	Shipston-on-Stour	-	+	++	++	+
SG18	West of Stratford-upon-Avon	-	-	-	++	+
SG19	East of Stratford-upon-Avon	-	-	-	++	+
SG20	Bidford-on-Avon	-	-	-	++	+
SG21	Alcester	-	-	-	++	+
SG22	West of Studley	++	-	+	++	+

SGL no.	Strategic Growth Location	NHS hospital	GP surgery	Leisure facilities	Green-space	PRoW / cycle
SG23	North of Henley-in-Arden	-	-	-	++	+
SG24	Hockley Heath	-	-	-	++	+

B.11.6 Ranking

Best performing	Worst performing
SG22: West of Studley	SG14: East of Gaydon
SG10: Bishop's Tachbrook	SG13: Gaydon Lighthorne Heath
SG05: East of Lillington	SG11: South East of Whitnash
SG12: Southam	SG02: Stoneleigh Park Employment
SG17: Shipston-on-Stour	SG24: Hockley Heath

B.11.6.1 The majority of SGLs have been identified to result in negative impacts on health overall, however a number of positive impacts have also been identified. More weighting has been given to proximity to NHS hospitals with an A&E service, where these are likely to require large amounts of time and investment to build new facilities. Given that all 24 of the SGLs have good access to the PRoW/cycle network, this receptor has been considered with less weighting than the other receptors. As new greenspaces are likely to be incorporated into all of the SGLs, there has also been less weighting placed on this receptor.

B.11.6.2 The West of Studley SGL has been identified as the **best performing** option where it is located wholly within 5km of an NHS hospital with A&E services, as well as have good access to greenspaces and being in close proximity to a leisure centre. Bishop's Tachbrook also perform strongly, where the majority is also located within 5km of an NHS hospital, is located in close proximity to GP surgeries and also has good access to greenspace. The East of Lillington, Southam and Shipston-on-Stour SGLs are also expected to result in positive impacts on access to GP surgeries, leisure centres and greenspaces.

B.11.6.3 East of Gaydon is identified as the **worst performing option** as this is the only SGL where adverse impacts are identified across all four of the receptors considered for health. The Gaydon Lighthorne Heath, South East of Whitnash, Stoneleigh Park Employment and Hockley Heath SGLs have also been also identified for their negative scores for access to A&E services, GP surgeries and leisure facilities. Several additional SGLs resulted in similar scores to those ranked in the bottom five, including the North of Henley-in-Arden, Bidford-on-Avon, East of Stratford-upon-Avon, West of Stratford-upon-Avon, Coventry Airport and South of Coventry SGLs.

B.11.7 Mitigation potential

- B.11.7.1 The increased demand on health facilities as proposed within the SGL options has potential to be largely mitigated through providing new healthcare infrastructure and leisure facilities, and increasing the capacity of existing facilities; namely hospitals, GP surgeries and leisure centres. Development should be prioritised in areas which are already accessible to a range of health facilities, where less intervention is likely to be required to provide sustainable development. Where these services are not accessible or lack capacity, new developments have potential to provide opportunities to create new health and leisure facilities where these can be co-located with other services, as well as improving access to these facilities through wider transport initiatives. However, this would require a significant level of investment in health services and leisure facilities which is likely to be difficult to achieve.
- B.11.7.2 Where greenspace provision is currently not accessible to site end users, there is potential for such impacts to be fully mitigated through onsite greenspace provision. It is expected that the SGLs will include integrated open spaces and active travel infrastructure, as highlighted within SWLP Policy Direction 1 (see **Appendix E**). The proposed integration of green / open spaces as part of the SGL development should ensure the provision of sustainable access to a variety of greenspaces (e.g. natural and semi-natural open spaces, sports pitches, allotments and children's play areas) for the majority of site end users, as well as improving air filtration and other ecosystem services. Other initiatives, such as the implementation of BNG, also have potential to contribute to the physical and mental health benefits of access to greenspaces and nature.

B.12 SA Objective 11: Accessibility

B.12.1 Proximity to bus stop

- B.12.1.1 Regular bus services are primarily found in the urban areas of Warwick, Leamington Spa and Stratford-upon-Avon, whereas bus stops providing less frequent services are situated more sparsely throughout the rural settlements. The majority of SGLs are largely located outside of the 400m sustainable distance to an existing bus stop.
- B.12.1.2 A total of 13 SGLs are located where less than 30% of the SGL is situated within 400m of an existing bus stop with frequent services. This includes the East of Gaydon and South of Europa Way SGLs, both of which are located wholly outside of a sustainable distance to a bus stop. A minor negative impact is expected for these 13 SGLs.
- B.12.1.3 Of the 11 remaining SGLs, seven are located the SGL area partially lies within 400m of a bus stop with frequent services (West of Warwick, South of Wellesbourne, South of Kenilworth, East of Stratford-upon-Avon, West of Studley, Bidford-on-Avon and Southam SGLs). A minor positive impact is therefore expected for bus stops on these seven SGLs. The four remaining SGLs, East of Lillington, Shipston-on-Stour, North of Leamington and Coventry Airport SGLs are located where the majority of the SGL is located within 400m of a bus stop with frequent services; therefore, a major positive impact is expected for these four SGLs.

B.12.2 Proximity to railway station

- B.12.2.1 Several main line railway stations are located in the SWLP area, including Stratford-upon-Avon Station and Warwick Station. However, the majority of SGLs are situated on the edge of settlements or within rural areas, and are subsequently located over a 2km sustainable distance away from a railway station.
- B.12.2.2 A total of 19 SGLs are located in areas where the majority of the proposed development area lies outside of a sustainable distance to a railway station. This includes 16 of the SGLs where these are located wholly beyond the recommended distance. The proposed development at these 19 SGLs have therefore been identified as having a minor negative impact on railway services.
- B.12.2.3 The remaining five SGLs (South of Kenilworth, Wedgnock Park Farm Employment, West of Warwick, West of Stratford-upon-Avon, North of Henley-in-Arden) are situated where over 50% of the SGL lies within 2km of a railway station. This includes the West of Warwick SGL where the majority is located within 2km to Warwick Station and Warwick Parkway Station, and the North of Henley-in-Arden SGL where the majority is located with 2km to Henley-in-Arden Station. As a consequence, a major positive impact has been identified for these five SGLs.

B.12.3 Access to food stores

- B.12.3.1 Existing food stores and local services are predominately located within the urban areas of Warwick, Leamington Spa and Stratford-upon-Avon, whereas a number of stores are more sparsely found throughout the rural settlements. The majority of SGLs are located outside of a sustainable distance of 800m to an existing food store.

- B.12.3.2 A total of 20 SGLs are located where the majority of the SGL lies over 800m from a food store. Of these, 12 SGLs are located wholly outside of a sustainable distance. The proposed development at these 20 SGLs has therefore been identified as having a minor negative impact on access to local services.
- B.12.3.3 The remaining four SGLs (Hockley Heath, East of Stratford-upon-Avon, East of Lillington and Shipston-on-Stour) are situated where the majority of the SGL lies within 800m of a food store. The best performing SGL for access to food stores is Hockley Heath SGL, where 64% of the SGL is situated within a sustainable distance to a food store. A minor positive impact is therefore expected for these four SGLs.

B.12.4 Connectivity

- B.12.4.1 Connectivity has been assessed against the 'South Warwickshire Settlement Analysis'²¹ which measures the presence of active travel and existing road network links surrounding settlement boundaries, and any barriers to movement in relation to these locations. Connectivity has been ranked on a scale of A-E, with Grade A representing excellent connectivity, and Grade E representing very poor connectivity. A precautionary approach has been taken so that the lowest level of connectivity present at the SGLs has been assessed. The majority of SGLs are expected to lie where there are areas with Grades C-D connectivity.
- B.12.4.2 The West of Warwick SGL lies adjacent to the A46, where the majority of the eastern side of the SGL lies in flood zone 3 (see also SA Objective 2: Flooding in **Chapter B.3**), although there are footpath connections to Warwick Town Centre via Warwick Racecourse. Due to the extensive barriers limiting further development to improve connectivity including the inclination of the land, flooding and noise from the A46, the south western part of the SGL is adjacent to areas of both Grade D and E. As a result, West of Warwick is expected to result in a major negative impact on connectivity.
- B.12.4.3 A total of 14 SGLs are located within areas of poor Grade D connectivity. Several barriers are present which limit potential for active travel and roads links to the SGL, such as bypasses, inclination of the land, cul-de-sacs, railways, rivers and floodplains. For instance, the West of Stratford-upon-Avon SGL is close to the A46, has a brook running through the SGL, and adjacent land between the 'Land North of Evesham Road' parcel and Stratford-upon-Avon town does not form part of the SGL proposal. In addition, a number of businesses are present within the South East of Whitnash SGL including 'Squab Hall Farm and Gighthouse Recording Studios'; these businesses would be required to relocate in order to allow for effective connectivity to and within the SGL. The proposed development at these 14 SGLs has therefore been identified as having a minor negative impact on connectivity.

²¹ South Warwickshire Councils (2022) 'South Warwickshire Settlement Analysis'

- B.12.4.4 Three SGLs, including Bishop's Tachbrook, North of Leamington and South of Kenilworth, have been identified to lie within areas of moderate connectivity (Grade C). There are often active travel links already present in these areas, although barriers still remain for creating sufficient accessibility for the areas of the SGLs which link to settlements. For example, the Bishop's Tachbrook SGL has multiple PRoWs running through the SGL connecting to Bishop's Tachbrook village, however the A452 runs adjacent to the SGL and may limit safe pedestrian access. Conversely, the presence of an A road also allows for adequate connectivity to main roads surrounding the SGL as well as access to Leamington Spa. Overall, the proposed development at these three SGLs is expected to result in a negligible impact on connectivity.
- B.12.4.5 The West of Studley SGL is located where the entirety of the northwestern border of the SGL lies within an area of good connectivity, considering three PRoWs run through the SGL which connect to Studley. A minor positive impact has been identified for the West of Studley SGL.
- B.12.4.6 The remaining five SGLs, which include Coventry Airport, East of Gaydon, Gaydon Lighthorne Heath, Hockley Heath, and Stoneleigh Park Employment, are not located within any areas that have been assessed within the South Warwickshire settlement analysis and the impact on connectivity is currently unknown. Therefore, the impact is uncertain at this stage.

B.12.5 Accessibility

- B.12.5.1 Accessibility has been assessed using 'priority areas', which have been identified by the South Warwickshire Councils to determine which areas are best located in terms of sustainable transport links and economic growth. Priority areas have been categorised on a scale of 1-3, with Priority Area 1 being those with the strongest access links to public transport infrastructure, employment opportunities, and closest proximity to existing settlement centres (amongst other criteria), and Priority Area 3 being those with moderate access links. The majority of SGLs are located where at least 50% of the SGL lies within Priority Areas 1 and 2.
- B.12.5.2 Five SGLs, including Coventry Airport, East of Lillington, Gaydon Lighthorne Heath, South of Coventry, and West of Warwick, are located where at least 50% of the SGL lies within Priority Area 1, and no more than 30% of the SGL lies outside of all priority areas. For instance, 94% of Coventry Airport and East of Lillington SGL lie within Priority Area 1. A major positive impact has been identified for these five SGLs on accessibility.
- B.12.5.3 A total of 12 SGLs are located where at least 50% of the SGL lies within Priority Areas 1 and 2, and less than 30% of the SGL lies outside of all priority areas. For example, Bidford-on-Avon is located where 24% of the SGL lies within Priority Area 1, 50% of the SGL lies within Priority Area 2, and 14% of the SGL lies outside of all priority areas. A minor positive impact has been identified for these 12 SGLs on accessibility.
- B.12.5.4 On the other hand, three SGLs including Alcester, East of Gaydon and North of Wellesbourne, lie where 30-50% of the SGL is not located within any priority area. All of these SGLs are situated in more rural locations where there is poor accessibility to town centres and economic areas. Consequently, a minor negative impact has been identified for these three SGLs on accessibility.

B.12.5.5 The remaining four SGLs including Bishop’s Tachbrook, Hockley Heath, South East of Whitnash and South of Europa Way, are located where 50% of the SGL lies within Priority Areas 1, 2 or 3, and less than 30% of the SGL lies outside of all priority areas. A negligible impact has been identified for these four SGLs on accessibility.

Table B.12.1: Assessment of SGLs against SA Objective 11: Accessibility

SGL no.	Strategic Growth Location	Bus stop	Railway station	Food Stores	Connectivity	Priority Areas
SG01	South of Coventry	-	-	-	0	++
SG02	Stoneleigh Park Employment	-	-	-	+/-	+
SG03	Coventry Airport	++	-	-	+/-	++
SG04	South of Kenilworth	+	++	-	0	+
SG05	East of Lillington	++	-	+	-	++
SG06	North of Leamington	++	-	-	0	+
SG07	Wedgnoek Park Farm Employment	-	++	-	-	+
SG08	West of Warwick	+	++	-	--	++
SG09	South of Europa Way	-	-	-	+/-	0
SG10	Bishop’s Tachbrook	-	-	-	0	0
SG11	South East of Whitnash	-	-	-	-	0
SG12	Southam	+	-	-	-	+
SG13	Gaydon Lighthorne Heath	-	-	-	+/-	++
SG14	East of Gaydon	-	-	-	+/-	-
SG15	North of Wellesbourne	-	-	-	-	-
SG16	South of Wellesbourne	+	-	-	-	+
SG17	Shipston-on-Stour	++	-	+	0	+
SG18	West of Stratford-upon-Avon	-	++	-	-	+
SG19	East of Stratford-upon-Avon	+	-	+	-	+
SG20	Bidford-on-Avon	+	-	-	-	+
SG21	Alcester	-	-	-	-	-
SG22	West of Studley	+	-	-	0	+
SG23	North of Henley-in-Arden	-	++	-	-	+
SG24	Hockley Heath	-	-	+	+/-	0

B.12.6 Ranking

Best performing	Worst performing
SG05: East of Lillington	SG15: North of Wellesbourne
SG17: Shipston-on-Stour	SG21: Alcester
SG04: South of Kenilworth	SG09: South of Europa Way
SG19: East of Stratford-upon-Avon	SG11: South East of Whitnash
SG08: West of Warwick	SG14: East of Gaydon

B.12.6.1 The assessment and ranking of the SGLs according to accessibility is based on existing infrastructure provision and does not factor in capacity or new railway stations, bus services or local services which could be provided alongside the development proposed with the SGLs. Greater weighting has been given in the ranking to those SGLs located in the Councils’ priority areas that are more well connected, and those in proximity to railway stations, given the resources which would be required to develop a new railway line or railway station.

- B.12.6.2 East of Lillington has been identified as the **best performing** option for accessibility as the majority of the SGL is located within a sustainable distance to bus stops and within Priority Area 1. Additionally, approximately half of the SGL lies within a sustainable distance to food stores. Although minor negative impacts have been identified for connectivity and access to rail stations, the SGL is likely to have the most positive impacts with regards to accessibility overall.
- B.12.6.3 A number of SGLs are also expected to result in more positive impacts for accessibility than others. Shipston-on-Stour SGL is in close proximity to existing food stores, bus stops and lies within Priority Area 2. South of Kenilworth lies within 2km of a railway station, partially within 400m to bus stops and within Priority Area 2. East of Stratford-upon-Avon SGL is located on the outskirts of a large town with positive impacts expected for access to bus stops, food stores and accessibility.
- B.12.6.4 The West of Warwick SGL, despite the potential major negative impact in relation to connectivity, is likely to result in positive impacts on access to bus stops, rail stations and is located within Priority Area 1. However, it is worth noting that poor connectivity only impacts a small area in the south west of the site, and connectivity impacts relating to the rest of the site are unknown. The councils should explore whether connectivity issues can be overcome, otherwise these are likely to counter the benefits of being in close proximity 'as the crow flies' to public transport infrastructure.
- B.12.6.5 It is also worth noting that various other SGLs have potential to perform similarly to those ranked in the top five for accessibility and transport. These include Coventry Airport, Wedgnock Park Farm and West of Stratford-upon-Avon SGLs, all of which are located in Priority Areas 1 and 2, and have good access to either bus stops or railway stations.
- B.12.6.6 The North of Wellesbourne and Alcester SGLs have been identified as the **worst performing** option for accessibility as both of these SGLs perform poorly across all receptors. These SGLs are not located within a sustainable distance to bus stops, railway stations or local services, are identified to have poor connectivity, and 43% of the site falls outside of any of the priority areas.
- B.12.6.7 Several other SGLs also perform poorly for accessibility. The South of Europa Way, South East of Whitnash and East of Gaydon SGLs are all located outside of sustainable distances to bus stops, rail stations and food stores. For the South of Europa Way and South East of Whitnash SGLs, negative impacts on connectivity have also been identified, whilst the East of Gaydon SGL is likely to perform poorly for accessibility in relation to the priority areas.

B.12.7 Mitigation potential

- B.12.7.1 The scale of development associated with the SGLs will place an increased demand on existing local services, limiting accessibility for current and future residents. There is potential for pressures on accessibility to be largely mitigated, primarily through investing in provision for public transport, active travel networks, and providing new local shops and facilities to serve new communities. This might involve liaising with the transport authority (Warwickshire County Council) to consider extending bus services, adding new bus stops and improving the frequency of services, for instance. In turn, improving public transport connections would also increase the extent of the Councils' priority areas, whilst ensuring new development is compatible with the '20-minute neighbourhoods' concept.

- B.12.7.2 Although likely to require further consultation with relevant transport bodies, any opportunities to improve the efficiency and extent of the railway network should be explored, where rural development areas, as well as smaller towns and villages, can have access to improved opportunities and connect site end users to the national railway network. Ideally, extending the railway network or building new stations could improve provision, although this may require a significant level of investment. Where it may not be feasible to do so, improving active travel networks and better integration of public transportation to railway stations can improve sustainable accessibility for SGLs which are located over 2km from a railway station. Opportunities for new park and ride facilities, as noted in Draft SWLP Policy Direction 5 (see **Appendix E**), would also help in this regard to limit the need for longer journeys via private car.
- B.12.7.3 The co-location of services allows facilities to be positioned in centralised locations that are accessible through a range of sustainable and active travel networks, in order to allow for day-to-day services to be accessible within a 20-minute travel time by foot or public transport. Combining appropriate employment land uses such as retail, commercial and residential facilities can alleviate pressures on land use, limit the need for private transport and improve accessibility for site end users with limited mobility.
- B.12.7.4 Existing services can be effectively utilised by allocating SGLs, or directing residential uses to areas within SGLs, which are already within a sustainable distance to public transport networks, shops and lie adjacent to areas with strong connectivity. For instance, the majority of the West of Stratford-upon-Avon SGL is located within a sustainable distance to bus stops and railway stations, however the 'Drayton Manor Farm' parcel to the south west of the SGL lies outside of these buffers. By omitting this parcel from development, and only allocating land which is already in proximity to these services, this will reduce the need to provide wholly new bus and railway services for areas of SGLs which lie outside of a sustainable distance to public transport networks.

B.13 SA Objective 12: Education

B.13.1 Access to primary school

- B.13.1.1 There are a total of 104 primary schools in South Warwickshire. The majority of proposed residential development is expected to lie outside of a sustainable distance to an existing primary school, mostly due to the location of SGLs on the urban fringe or rural areas.
- B.13.1.2 It is worth noting that the assessment does not factor in current or future capacities for educational provision, which may result in schools having an inadequate capacity for new students even where these schools lie within a sustainable distance.
- B.13.1.3 Of the 21 SGLs proposed for residential or mixed-use, only two (Bishop's Tachbrook and Hockley Heath) are situated where at least 50% of the SGL area lies within a sustainable distance to an existing primary school. The proposed development at these two SGLs could potentially have a minor positive impact on access to primary schools.
- B.13.1.4 The remaining 19 SGLs are situated where less than 50% of the SGL area lies within a sustainable distance to primary school. At this stage the location of different land uses within the SGLs is not known, and the assessment is based on the SGL boundaries provided. Due to the overall scale of the SGLs, large sections may lie within the 800m sustainable distance to a primary school, whilst still leaving the majority of the SGL outside of this distance. For instance, although 45ha in the north of South East of Whitnash SGL is located within 800m of Oakley School, this only comprises 13% of the SGL. The southernmost part of the SGL is located 2km away from any primary school. In addition, the Alcester and East of Gaydon SGLs are situated wholly outside of the 800m sustainable distance from a primary school. For these 22 SGLs, a minor negative impact is expected.
- B.13.1.5 Employment-led SGLs are identified to have a negligible effect on access to education.

B.13.2 Access to secondary school

- B.13.2.1 There are a total of 23 secondary schools in South Warwickshire. The majority of proposed residential development is expected to lie outside of a sustainable distance to an existing secondary school, mostly due to the location of SGLs on the urban-fringe or rural areas.
- B.13.2.2 Of the 21 SGLs proposed for residential or mixed-use, only six (Alcester, North of Leamington, Shipston-on-Stour, Southam, West of Studley and West of Warwick) are situated where at least 50% of the SGL area lies within a sustainable distance to an existing secondary school. For instance, the North of Leamington lies wholly within the 1.5km sustainable distance to North Leamington School and Trinity Catholic School, and West of Studley SGLs lie wholly within the 1.5km sustainable distance to Studley High School. The proposed development at these six SGLs could potentially have a minor positive impact on access to secondary schools.
- B.13.2.3 The remaining 15 SGLs are situated so that less than 50% of the SGL area lies within a sustainable distance to an existing secondary school. This includes 11 of the SGLs which are situated wholly outside the 1.5km sustainable distance from a secondary school. For these 15 SGLs, a minor negative impact is expected.
- B.13.2.4 Employment-led SGLs are identified to have a negligible effect on access to education.

B.13.3 Access to further education

- B.13.3.1 The law now requires 16–18-year-olds to remain in full-time education or training which can include sixth forms and colleges. According to data provided by the Councils, there are a total of 20 such educational facilities in South Warwickshire. The majority of proposed residential-led SGLs are expected to lie within the 5km sustainable distance to a further educational facility.
- B.13.3.2 Of the 21 SGLs proposed for residential or mixed-use development, 16 are situated where at least 50% of the SGL area lies within a sustainable distance to a further educational facility. This includes 12 SGLs which lie wholly within the 5km sustainable distance to a sixth form or college. The proposed development at these 21 SGLs could potentially have a minor positive impact on access to further education.
- B.13.3.3 The remaining five SGLs (East of Gaydon, South of Wellesbourne, North of Wellesbourne, North of Henley-in-Arden and Shipston-on-Stour) are situated where the SGL area wholly lies beyond a sustainable distance to a further educational facility. For these five SGLs, a negligible impact is expected.
- B.13.3.4 Employment-led SGLs are identified to have a negligible effect on access to education.

Table B.13.1: Assessment of SGLs against SA Objective 12: Education

SGL no.	Strategic Growth Location	Primary school	Secondary school	Further education
SG01	South of Coventry	-	-	+
SG02	Stoneleigh Park Employment	0	0	0
SG03	Coventry Airport	0	0	0
SG04	South of Kenilworth	+	-	+
SG05	East of Lillington	-	-	+
SG06	North of Leamington	-	+	+
SG07	Wedgnoek Park Farm Employment	0	0	0
SG08	West of Warwick	-	+	+
SG09	South of Europa Way	-	-	+
SG10	Bishop's Tachbrook	+	-	+
SG11	South East of Whitnash	-	-	+
SG12	Southam	-	+	+
SG13	Gaydon Lighthorne Heath	-	-	+
SG14	East of Gaydon	-	-	0
SG15	North of Wellesbourne	-	-	0
SG16	South of Wellesbourne	-	-	0
SG17	Shipston-on-Stour	-	+	0
SG18	West of Stratford-upon-Avon	-	-	+
SG19	East of Stratford-upon-Avon	-	-	+
SG20	Bidford-on-Avon	-	-	+
SG21	Alcester	-	+	+
SG22	West of Studley	-	+	+
SG23	North of Henley-in-Arden	-	-	0
SG24	Hockley Heath	+	-	+

B.13.4 Ranking

Best performing	Worst performing
SG22: West of Studley	SG14: East of Gaydon
SG06: North of Leamington	SG15: North of Wellesbourne
SG21: Alcester	SG16: South of Wellesbourne
SG08: West of Warwick	SG23: North of Henley-in-Arden
SG12: Southam	SG20: Bidford-on-Avon

- B.13.4.1 Access to education has potential for improvement within the SWLP area, where all SGLs within residential capacity are likely to result in negative impacts on access to existing primary and/or secondary schools. When considering the best and worst performing options, a greater weight has been placed on proximity to secondary schools, considering the establishment of a new secondary education facility will be likely to require more significant resources and investment. Further education has been considered with the least weight as students at this stage are more likely to be willing to travel further in order to access an establishment which meets with their specific needs and education goals.
- B.13.4.2 East of Gaydon SGL is identified as the **worst performing** option as it falls outside of the sustainable distances for primary, secondary and further education facilities. The nearest primary school is Bishop’s Itchington Primary which is 1.5km away, and the nearest secondary school is Kineton High School (and its associated Sixth Form facility) which lies over 5km away.
- B.13.4.3 Multiple other SGLs are similarly expected to have poor access to educational facilities. The North of Wellesbourne, South of Wellesbourne and North of Henley-in-Arden SGLs are all located outside of a sustainable distance to primary schools, secondary schools and sixth form facilities. The Bidford-on-Avon SGL is also likely to result in negative impacts on education access; although just over half of the SGL lies within 5km of the Alcester Grammar School and St Benedict’s School Sixth Forms, it also lies outside of the recommended sustainable distance to primary and secondary schools.
- B.13.4.4 Numerous other SGLs also lie outside of sustainable distances to primary and secondary schools, including the East of Lillington, East of Stratford-upon-Avon, West of Stratford-upon-Avon, Gaydon Lighthorne Heath, South East of Whitnash, South of Coventry, South of Europa Way and South of Kenilworth SGLs. However, these all lie wholly within 5km of a sixth form facility.
- B.13.4.5 The **best performing** SGLs are expected to be West of Studley and North of Leamington. Although both are located where only 25% of the SGL lies within a sustainable distance to a primary school, they wholly lie within a sustainable distance to a secondary school and a further educational facility. Additionally, Alcester, West of Studley and Southam SGLs all lie where over half of the SGL area is within a sustainable distance to a secondary school, and wholly within a sixth form facility. It is also worth noting that the Hockley Heath and North of Leamington SGLs lie within a sustainable distance to both primary schools and further educational facilities.

B.13.5 Mitigation potential

- B.13.5.1 The majority of development is proposed on the urban-rural fringe or is located within rural areas where access to existing schools is likely to be limited, with longer travel times and less sustainable travel modes likely. Depending on the capacity of existing schools, or potential for these schools to be expanded, the most feasible way to ensure new residents have sufficient access to schools is by developing parcels which are already located within a sustainable distance to educational facilities, where these can be absorbed into existing schools. For instance, the northwestern area of the South East of Whitnash SGL is located where the proposed development is partially located within 800m of a primary school and 1.5km of a secondary school. Residential development should therefore be prioritised in these areas, considering the southeastern most corner of the SGL lies over 2km from any primary school, and 4km away from any secondary school.
- B.13.5.2 Through liaison with the education authority (Warwickshire County Council), the expansion of existing schools and construction of new schools should also be implemented to avoid placing further pressure on places at existing schools. Where schools are already established, further investment may be required to ensure these have sufficient capacity for an increased number of residents, potentially in the form of developer contributions, and that travel plans are put in place to ensure sustainable access can be encouraged within defined catchment zones.
- B.13.5.3 Where new schools are unable to be provided, reliable and affordable public transportation options should be in place to promote sustainable travel to schools which lie outside of a sustainable distance to SGLs, in particular for those of secondary school and sixth form age. To encourage active travel for all schools including primary schools, public footpaths and pedestrian walkways should be well-maintained, and opportunities should be sought to improve safe cycling provision.

B.14 SA Objective 13: Economy

B.14.1 Sustainable access to existing employment opportunities

- B.14.1.1 The SWLP area provides a range of employment opportunities, with a large number located in the urban areas of Warwick and Leamington Spa. A number of smaller employment sites lie in proximity to rural settlements. A total of 46 mapped key employment locations have been provided by the Councils. A 5km target distance has been used to consider whether SGLs are located within a sustainable distance to an existing employment location.
- B.14.1.2 Of the 21 SGLs proposed for residential and mixed-use, 20 are located within 5km of an employment location, with the majority of these being in proximity to multiple employment locations. For instance, the West of Warwick SGL lies adjacent to Budbrooke Road Industrial Estate, and also lies within 5km of 13 further employment locations situated within Warwick, the nearest being Tournament Court, Harris Road Industrial Estate and Opus 40. Additionally, SGLs located near urban areas are likely to have access to a wider range of commercial opportunities within town centres. A minor positive impact is expected for these 20 SGLs.
- B.14.1.3 It is noted that Hockley Heath SGL does not lie within the 5km recommended distance to any existing key employment locations provided by SWLP within the Plan area. However, this SGL is located approximately 1.3km from Blythe Business Park north of the Plan area, as well as potential opportunities in Dorridge, Knowle and the outskirts of Birmingham. This SGL is therefore also likely to result in a minor positive impact on access to employment.
- B.14.1.4 North of Henley-in-Arden SGL is the only SGL which is not located within 5km of any key employment locations. The nearest employment sites to this SGL include Birmingham Road in Studley which lies 7km away. As the proposed development at the North of Henley-in-Arden SGL is likely to limit access to existing employment opportunities for residents and encourage private vehicle use for commuting purposes, a minor negative impact has been identified for this SGL on employment.

B.14.2 Employment floorspace provision

- B.14.2.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each SGL, based on information provided by the Councils.
- B.14.2.2 Three SGLs including Coventry Airport, Stoneleigh Park and Wedgnock Park Farm are all proposed for employment use. Stoneleigh Park Employment SGL only partially comprises existing employment floorspace and contains a large proportion of previously undeveloped land, whilst Wedgnock Park Farm SGL is almost wholly undeveloped with the exception of industrial/agricultural buildings in the centre of the SGL. As a result, it is likely these two SGLs will provide over 1000m² of new employment floorspace and will have a major positive impact on employment provision.

- B.14.2.3 On the other hand, Coventry Airport SGL wholly comprises the existing airport, where the nature of potential future employment development is not yet known. It is uncertain whether the proposed development at this SGL will result in a net change in employment floorspace.
- B.14.2.4 The majority of SGLs are proposed for mixed-use development; it is unknown at this stage the proportion and exact location of development within these SGLs which will be used for employment, residential or other purposes. Consequently, the impact these 17 SGLs will have with regard to the potential change in employment floorspace provision is uncertain.
- B.14.2.5 All five solely residential SGLs are located on previously undeveloped land and will not be expected to result in a net change in employment floorspace; therefore, the proposed development at these SGLs is likely to have a negligible impact on the provision of employment opportunities.

Table B.14.1: Assessment of SGLs against SA Objective 13: Economy

SGL no.	Strategic Growth Location	Access to existing employment opportunities	Employment floorspace provision
SG01	South of Coventry	+	+/-
SG02	Stoneleigh Park Employment	0	++
SG03	Coventry Airport	0	+/-
SG04	South of Kenilworth	+	0
SG05	East of Lillington	+	0
SG06	North of Leamington	+	0
SG07	Wedgnock Park Farm Employment	0	++
SG08	West of Warwick	+	0
SG09	South of Europa Way	+	+/-
SG10	Bishop's Tachbrook	+	+/-
SG11	South East of Whitnash	+	+/-
SG12	Southam	+	+/-
SG13	Gaydon Lighthorne Heath	+	+/-
SG14	East of Gaydon	+	+/-
SG15	North of Wellesbourne	+	+/-
SG16	South of Wellesbourne	+	+/-
SG17	Shipston-on-Stour	+	+/-
SG18	West of Stratford-upon-Avon	+	+/-
SG19	East of Stratford-upon-Avon	+	+/-
SG20	Bidford-on-Avon	+	+/-
SG21	Alcester	+	+/-
SG22	West of Studley	+	0
SG23	North of Henley-in-Arden	-	+/-
SG24	Hockley Heath	+	+/-

B.14.3 Ranking

Best performing	Worst performing
SG08: West of Warwick	SG23: North of Henley-in-Arden
SG22: West of Studley	SG21: Alcester
SG09: South of Europa Way	SG14: East of Gaydon
SG10: Bishops Tachbrook	SG17: Shipston-on-Stour
SG06: North of Leamington	SG13: Gaydon Lighthorne Heath

B.14.3.1 Economy has been ranked solely considering the access to employment opportunities. The majority of SGLs are uncertain at this stage for employment floorspace, where this cannot be consistently factored into the ranking.

B.14.3.2 The West of Warwick is considered to be the **best performing** for employment where this is located adjacent to Budbrooke Industrial estate. The SGL also lies in close proximity to a number of other employment locations, and adjacent to the town of Warwick where there are likely to be other commercial and office-based opportunities that are commutable via sustainable and active transport options. Similarly, the West of Studley is close to a number of opportunities and lies within 5km of the majority of Redditch, as well and South of Europa Way, Bishop’s Tachbrook and the North of Leamington which are located on the outskirts of Warwick and Leamington Spa, also close to a number of employment opportunities.

B.14.3.3 As the North of Henley-in-Arden SGL is located the farthest from an existing key employment location at 7km away from Birmingham Road, Studley, this is identified as the **worst performing** SGL for employment opportunities in the Plan area. East of Gaydon also lies 5km from the nearest employment opportunity in Southam, where the provision for Jaguar Land Rover is currently unknown given the potential development at Gaydon Lighthorne Heath. The Alcester, Shipston-on-Stour and Gaydon Lighthorne Heath SGLs are also in proximity to only one small employment site each, where access to employment opportunities is therefore more limited.

B.14.4 Mitigation potential

B.14.4.1 Although employment provision in the SWLP area is likely to result in positive impacts for the majority of SGLs in principle, there greatest benefits can be secured through allocating sufficient employment land in line with the identified need. New employment sites should ensure employment opportunities are available for a wide range of skillsets and different sectors, in a variety of locations across the Plan area. For the North of Henley-in-Arden SGL, new employment provision should be considered. Additionally, improving sustainable access to employment opportunities through new and extended public transport links to these areas can improve access to urban areas where more employment opportunities are likely to be available. The employment-led SGLs should ensure to incorporate measures that will encourage future employees to choose more sustainable transport methods over private cars.

- B.14.4.2 Uncertain effects have been recorded for SGLs which have potential to result in a loss of employment floorspace. If development coincides with employment floorspace, this should be avoided where possible, unless the purpose is for redevelopment or expansion. Where development coinciding with employment space cannot be avoided, existing employment spaces should be relocated, although this is potentially disruptive for businesses and those relying on existing employment sites. However, any loss to employment floorspace is potentially reversible, as the Plan should be aiming for an overall net gain in employment floorspace.
- B.14.4.3 Enabling work from home provision can open a number of employment opportunities to residents who are not located in proximity to an employment location. By incorporating high-speed fibre connections into new developments, efficient internet access should be provided to allow for residents to carry out home-working in the SWLP area, as well as benefitting businesses and commercial enterprises.

Appendix C: Assessment of New Settlement Options

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C.1 Introduction

C.1.1 Overview

- C.1.1.1 The appendix provides an appraisal of 12 potential locations for new settlements (see **Table C.1.1** and **Figure C.1.1**). The South Warwickshire Councils are exploring the potential to meet a proportion of identified needs through a new settlement, representing a new community that can fulfil the majority of its day-to-day needs within the settlement itself. An assumption of 40 dwellings per hectare has been applied and that 40% of the new settlement will comprise greenspace to optimise green infrastructure benefits including delivery of ecosystem services.
- C.1.1.2 The new settlements have been assessed for likely impacts on each of the 13 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in the tables within each SA Objective chapter, in accordance with the methodology set out in **Chapter 2** of the main SA Report.
- C.1.1.3 The assessments of the 12 new settlements are based on the boundaries provided by the Council at this stage. The boundaries will be subject to change over the plan making process, and at the current Regulation 18 stage are intended to be indicative.
- C.1.1.4 All the assessments at this stage are based on the desktop review of available data and current information and evidence studies, provided by Stratford-on-Avon and Warwick District Councils or available online.
- C.1.1.5 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the Councils, as well as expert judgement.
- C.1.1.6 A number of recommendations have been made for further surveys to improve granularity of assessment, as well as recommendations to carefully consider the layout and design of new development. These are discussed within the mitigation sections under each SA Objective in the following chapters of this appendix, and summarised in **Chapter 9** of the main SA Report.

Table C.1.1: *New Settlements identified by Stratford-on-Avon District Council and Warwick District Council*

New Settlement	Gross area (ha)	Indicative capacity
A1 Land South of Tanworth-in-Arden	486.0	9,720
A2 Land East of Wood End	293.2	5,860
B1 Land at Hatton	403.42	8,156
BW Land at Bearley and Wilmcote	329.64	6,762
C1 Land South of Kingswood	247.6	4,960
E1 Long Marston Airfield	770.50	9,850
F1 Land to the West of Ufton	336.1	6,720
F2 Land South of Deppers Bridge	242.7	4,840
F3 Land North East of Knightcote	340.4	6,800
G1 Land to the West of Knightcote	268.1	5,360
X1 Land South of Leamington/North of Wellesbourne/east of Barford	325.9	6,520
X2 Land East of Leamington Spa/Whitnash and west of B445 Fosse Way	323.5	6,480

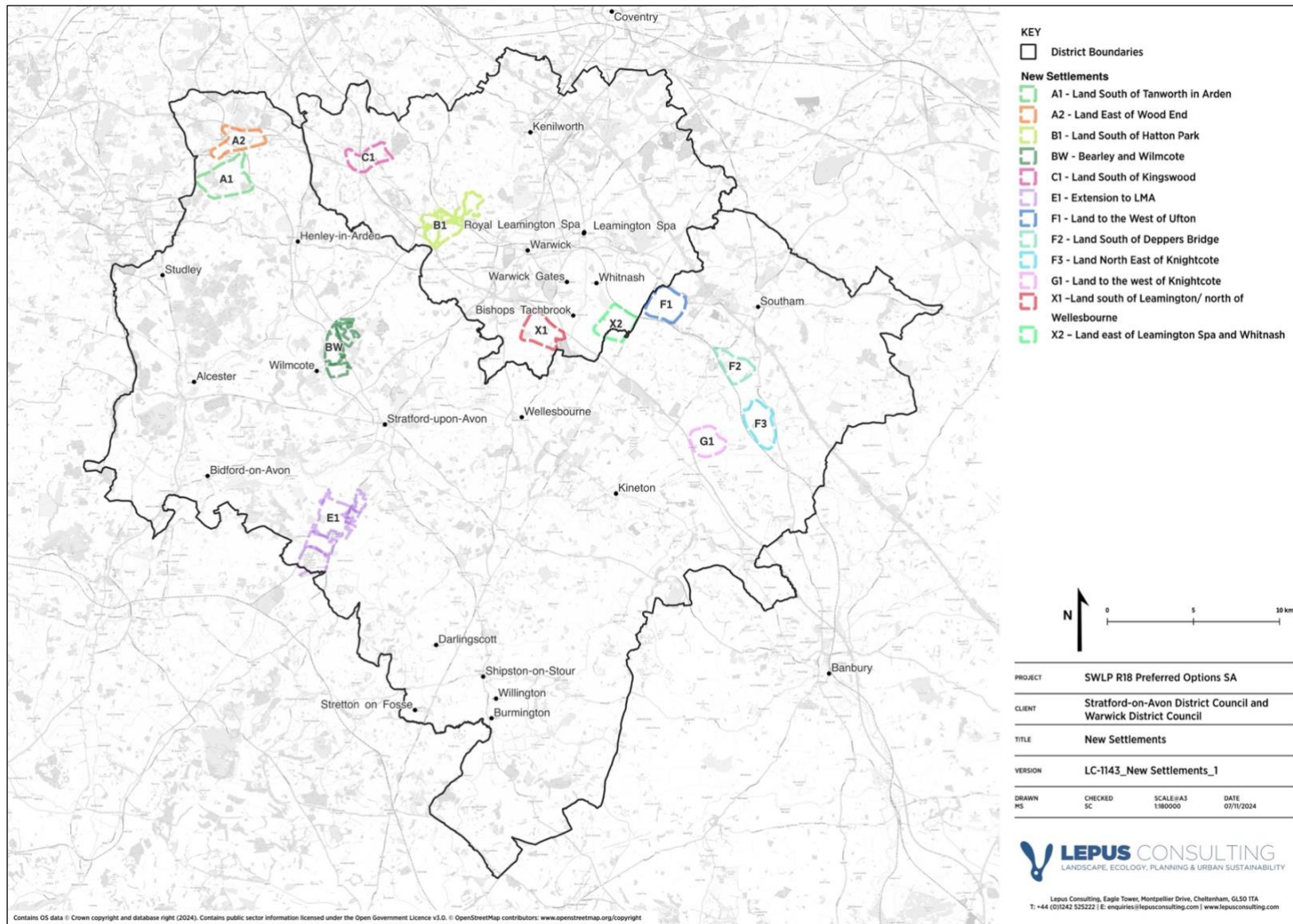


Figure C.1.1: Location of potential new settlements within the Plan area

C.2 SA Objective 1: Climate Change

C.2.1 Overview

C.2.1.1 The majority of greenhouse gas (GHG) emissions produced within Stratford-upon-Avon district and Warwick district are associated with transport and domestic related emissions¹.

C.2.1.2 The impact matrix for the 12 new settlements for climate change (SA Objective 1) is presented within **Table C.2.1**.

C.2.2 GHG emissions

C.2.2.1 New development is likely to result in an increase in GHG emissions associated with impacts of the construction phase, the occupation and operation of homes and businesses, energy and water consumption and increases in local road transport with associated emissions. The extent of this impact is likely to be greater when considering large-scale development in previously undeveloped locations where soil resources and associated carbon stores are likely to be lost. This impact is considered to be permanent and non-reversible.

C.2.2.2 All 12 of the new settlements are located on undeveloped land and propose development over the 1% threshold described in the methodology (see **Chapter 2** of the main SA Report). A major negative impact on climate change is identified for all 12 of the new settlements.

Table C.2.1: Impact matrix of new settlements for climate change - SA Objective 1

New Settlement	Increase in GHG emissions	SA1 ranking
A1	--	=
A2	--	=
B1	--	=
BW	--	=
C1	--	=
E1	--	=
F1	--	=
F2	--	=
F3	--	=
G1	--	=
X1	--	=
X2	--	=

¹ DESNZ (2024). UK greenhouse gas emissions: local authority and regional. Available at: <https://www.data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/uk-greenhouse-gas-emissions-local-authority-and-regional> [Date accessed: 30/10/24]

C.2.3 Ranking

- C.2.3.1 No single new settlement can be identified as the best or worst option for climate change at this stage of the assessment process, due to limitations in the current available information. More detail regarding impacts relating to climate change can be seen in Flood Risk (SA Objective 2), Pollution (SA Objective 6), and Accessibility (SA Objective 11). A more detailed carbon footprinting exercise could allow for more meaningful evaluation, as well as any further detail on the potential for new settlements to draw on low-carbon and renewable technologies, as discussed in **section C.2.4** below.
- C.2.3.2 Based on the current available information provided by the Councils, the only method by which to separate the new settlements is through using the indicative capacities at each new settlement, where the new settlement that proposes the greatest number of dwellings could be identified as the worst performing option.
- C.2.3.3 All 12 new settlements are expected to result in a major negative impact on climate change, where the proposed development will be expected to significantly increase GHG emissions in the SWLP area. The best performing new settlement based on indicative capacity alone is identified as New Settlement F2 and the worst performing new settlement based on indicative capacity alone is identified as New Settlement E1.

C.2.4 Mitigation

- C.2.4.1 The incorporation of green infrastructure (GI) within developments presents several opportunities to mitigate climate change, for example, through providing natural cooling to combat the 'urban heat island' effect and providing more pleasant outdoor environments to encourage active travel.
- C.2.4.2 Planning new settlements to support the 20-minute neighbourhood concept² will facilitate walkable neighbourhoods that are safe, highly accessible to all members of the community and encourage active modes of travel such as cycling through segregated cycle lanes for example. Planning for a neighbourhood which includes high-quality connections of local services will encourage people to travel by foot or other active modes of travel and facilitates healthy lifestyles, which can also help to minimise congestion and therefore a likely reduction in GHG emissions such as carbon dioxide.
- C.2.4.3 Integration of low carbon and renewable energy technologies such as solar and wind generation of electricity, avoiding use of gas boilers in homes and promoting decentralised heat and energy networks can help to reduce reliance on energy from fossil fuels and subsequently reduce associated GHG emissions. At this stage there is no information available regarding the potential of any new settlements to draw on or provide such technologies, but it is recommended this is explored further by the Councils. Draft SWLP policies / policy directions under the 'A Climate Resilient and Net Zero Carbon South Warwickshire' topic will be vital in this regard (see **Appendix E**).

² TCPA (2021). 20-minute Neighbourhoods. Creating Healthier, Active, Prosperous Communities an Introduction for Council Planners in England. Available at: https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf [Date accessed: 01/11/24]

C.2.4.4 Appropriate design and layout of proposals, including tree planting, landscaping and retrofitting buildings to make them energy efficient will help to reduce energy consumption and increase resilience to increased temperatures. National and local design policy and guidance should be followed to ensure development is considering approaches to mitigate climate change³. Provision of necessary infrastructure should be provided to encourage low carbon options such as electric vehicles (EV) and protection and enhancement of public space to facilitate safe walking and cycling opportunities. Furthermore, quantifying and reducing embodied carbon throughout the development at the new settlements will help to reduce carbon impacts, for example by using low carbon materials.

³ TCPA and RTPI (2023). The Climate Crisis. A Guide for Local Authorities on Planning for Climate Change. Available at: <https://www.tcpa.org.uk/resources/the-climate-crisis-a-guide-for-local-authorities-on-planning-for-climate-change/> [Date accessed: 05/11/24]

C.3 SA Objective 2: Flooding

C.3.1 Overview

C.3.1.1 Watercourses that pass through the two districts include the River Avon, Arrow, Alne, Dene and Stour. Fluvial flood risk is primarily located around the larger rivers, namely the Stour and the Avon (see **Figure C.3.1**).

C.3.1.2 Due to the rural nature of South Warwickshire, with limited brownfield land, and the nature of the potential developments comprising new standalone settlements, all 12 new settlements direct significant quantities of development to previously undeveloped land in the countryside, leading to a loss in vegetation coverage and permeable soils, resulting in a loss of natural rainwater capture and increased run-off rates. Surface water flooding is dispersed throughout the Plan area (see **Figure C.3.2**) and may be exacerbated through the introduction of more impermeable surfaces without careful planning.

C.3.1.3 The impact matrix for the 12 new settlements and the ranking for flooding (SA Objective 2) is presented within **Table C.3.1**.

C.3.2 Flood Zones

C.3.2.1 Seven of the new settlements (A1, A2, B1, BW, C1, F1 and G1) are located within Flood Zone 1 and will locate development in areas at low risk of fluvial flood risk; as such a minor positive impact is identified. The development within these seven new settlements will be expected to perform strongest against this receptor. Less than 10% of the indicative areas for New Settlements E1, F2 and X1 are located in Flood Zones 2 or 3 and a negligible impact on fluvial flood risk is identified. For New Settlements F3 and X2, more than 10% but less than 50% of the indicative areas lie within Flood Zones 2 and 3, potentially placing some residents in areas at risk of fluvial flooding; therefore, a minor negative impact on fluvial flooding is identified. Approximately 10.8% of New Settlement F3 is located within Flood Zone 2 and 9.6% of F3 is located within Flood Zone 3. New Settlement X2 performs the worst against this receptor, where 17.8% of the area is located within Flood Zone 2 and 16.3% of the area is located within Flood Zone 3.

C.3.3 Surface water flood risk

C.3.3.1 None of the 12 new settlements are located in areas where more than 10% of the new settlement area coincides with high surface water flooding (SWFR). However, six of the new settlements (C1, E1, F1, F3, G1 and X2) are located in areas at risk of surface water flooding, where more than 10% of the new settlement area coincides with areas of high, medium or low SWFR. New Settlement E1 is the only new settlement where 10% of the new settlement coincides with High SWFR and New Settlement F3 is the only new settlement where more than 10% of the settlement coincides with medium SWFR. The remaining four new settlements (C1, F1, G1 and X2) are located in areas where more than 10% of the new settlement coincides with low SWFR. Therefore, minor negative impacts are identified at these six new settlements. New Settlement F3 performs the worst against this receptor where 18.9% of the indicative area is located in areas of low SWFR and 10.9% of the settlement is located within areas of medium SWFR.

C.3.3.2 Less than 10% of the indicative area for six new settlements (A1, A2, B1, BW, F2 and X1) is located within any area of SWFR. New Settlement X1 performs the best, where only 7.5% of the indicative area is located within areas of low SWFR and 2.8% of the settlement is located within areas of medium SWFR.

Table C.3.1: Impact matrix of new settlements for flooding - SA Objective 2

New Settlement	Flood zone	Surface water flood risk	SA2 ranking
A1	+	0	1 st
A2	+	0	2 nd
B1	+	0	4 th
BW	+	0	6 th
C1	+	-	5 th
E1	0	-	10 th
F1	+	-	8 th
F2	0	0	7 th
F3	-	-	12 th
G1	+	-	9 th
X1	0	0	3 rd
X2	-	-	11 th

C.3.4 Ranking

C.3.4.1 The **best performing** option for flooding (SA Objective 2) is New Settlement A1, where the new settlement is located within Flood Zone 1 and only a small proportion of the new settlement area is located within low SWFR. The **worst performing** option is identified as New Settlement F3, with proportions of the settlement being located in Flood Zone 2 and 3 and additionally being located within areas of low and medium SWFR. The remaining new settlements have been ranked based on the proportions of SWFR and flood zones within the indicative area of the new settlement.

C.3.5 Mitigation

C.3.5.1 The Sequential Test will need to be applied to development that is located within areas at risk of flooding, seeking to avoid development within Flood Zones 2 and 3. Where 40% of the new settlement area is to be used for GI, it is expected that there will be scope to ensure in the site design that built development will not be located in areas at risk of fluvial or surface water flooding. Careful integration of sustainable drainage strategies (SuDS) will help to mitigate adverse impacts of flooding through replicating greenfield runoff rates. Opportunities should be sought for incorporating SuDS that can secure multi-functional benefits, as highlighted in Draft SWLP Policy K (see **Appendix E**). Site-Specific Flood Risk Assessments should be considered for development sites that are located in areas of flood risk to look for further mitigation measures including: site layout and design, modification of ground levels, raised floor levels, raised defences and funding from developer contributions.

C.3.5.2 It should be noted that other potential sources of flood risk, such as sewer flood risk, should also be explored and quantified where specific data has not been available to inform the SA assessments. It is expected that site-specific flood risk assessments will be undertaken, in accordance with Draft SWLP Policy J (see **Appendix E**).

C.3.5.3 Nature based solutions such as conserving and enhancing waterbodies and natural river functions within or in close proximity to new settlements, should be incorporated into the design and layout of development. Following guidance from the Environment Agency⁴, nature-based solutions could include planting trees and hedges and improve soil cover to increase water absorption, catch rainfall and slow down surface water run-off.

⁴ Environment Agency (2021). Use nature-based solutions to reduce flooding in your area. Available at: <https://www.gov.uk/guidance/use-nature-based-solutions-to-reduce-flooding-in-your-area> [Date accessed: 01/11/24]

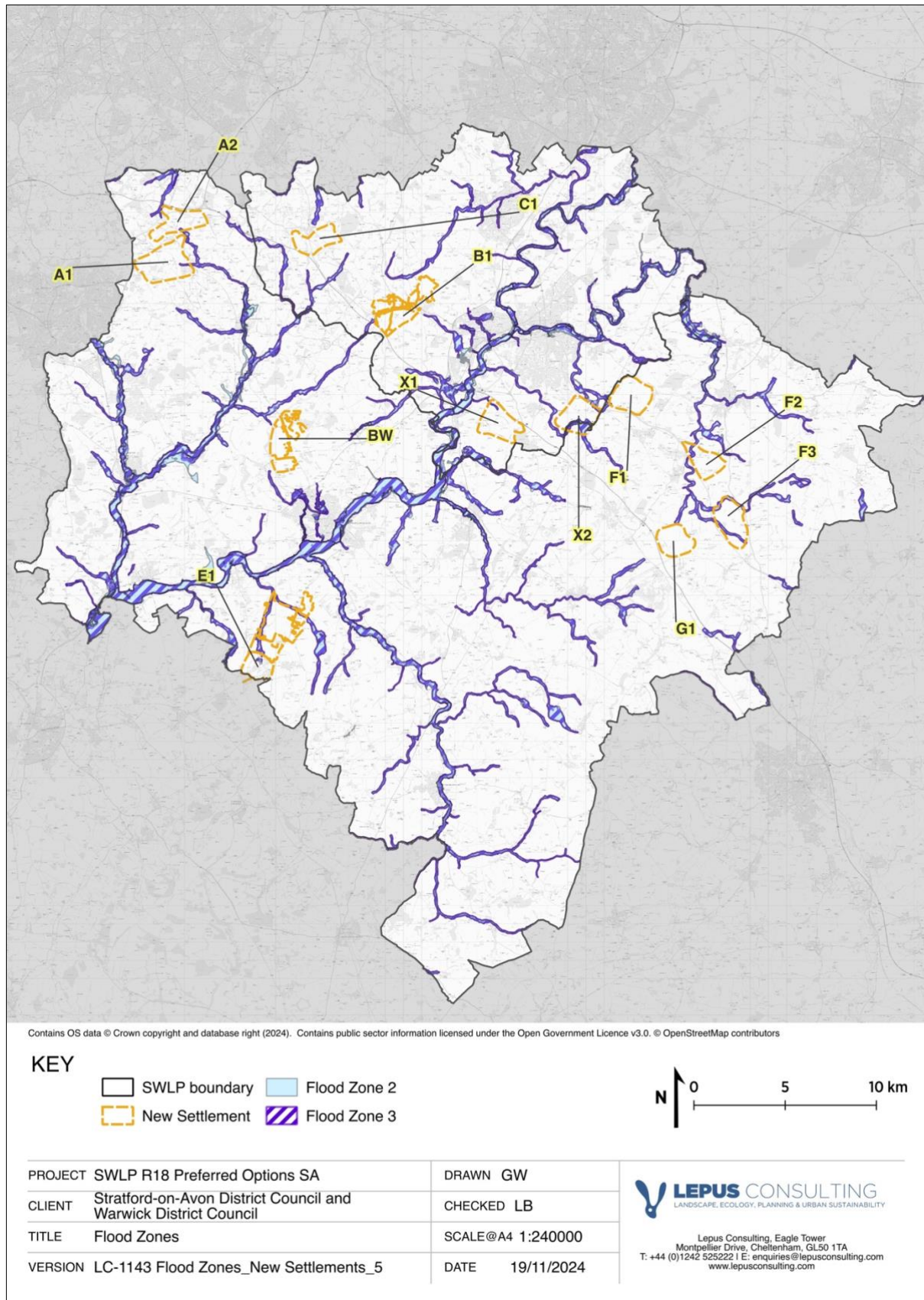


Figure C.3.1: Fluvial Flood Zones within the SWLP area

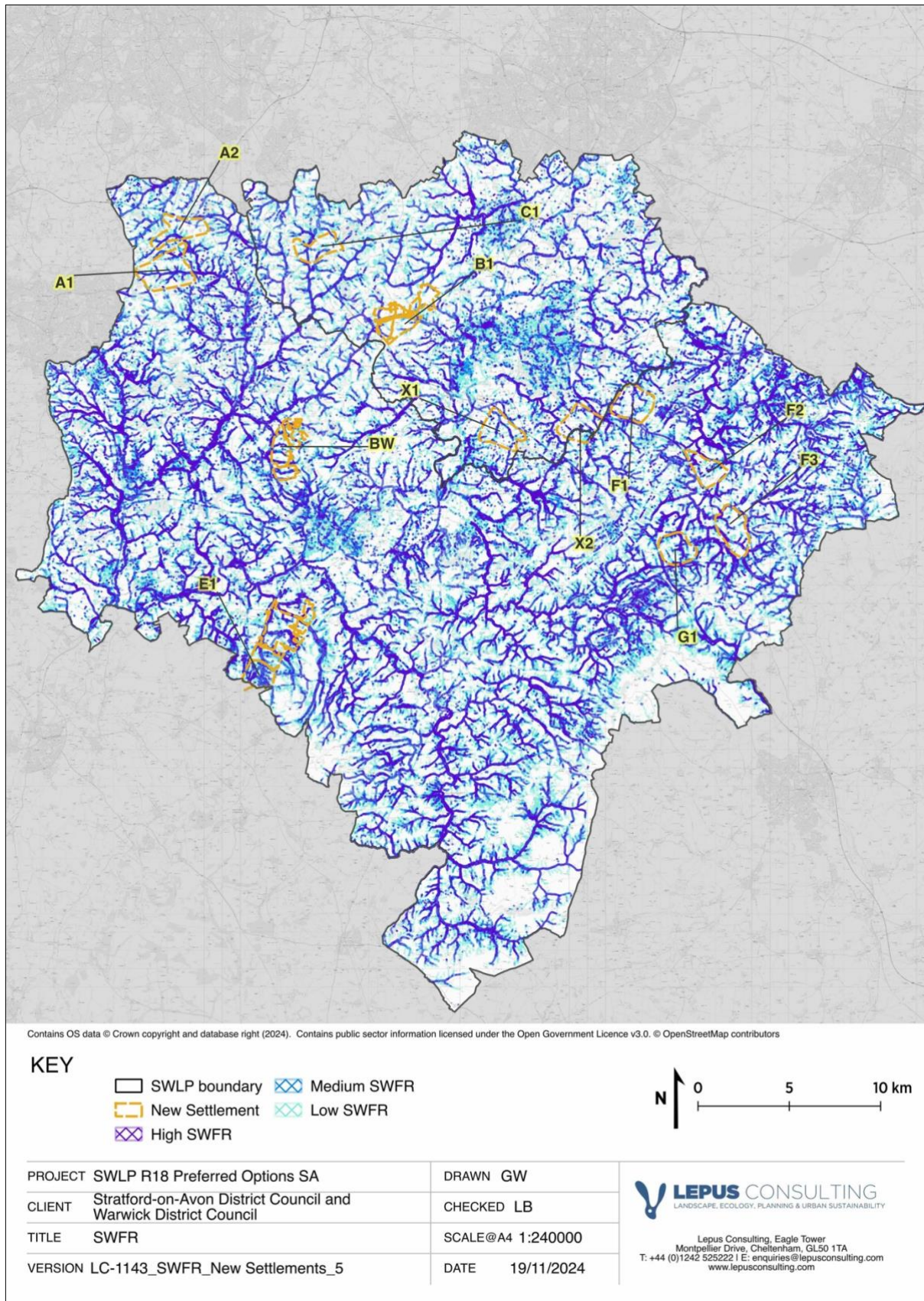


Figure C.3.2: Extent of surface water flood risk within the SWLP area

C.4 SA Objective 3: Biodiversity and geodiversity

C.4.1 Overview

C.4.1.1 The SWLP area includes various biodiversity and geodiversity assets, including nationally (see **Figure C.4.1**) and locally (see **Figure C.4.2**) designated sites. The 12 new settlements comprise large areas of undeveloped land which are likely to contain habitats and features which serve local wildlife and contribute to the wider ecological network. Development in these locations may also increase the risk of direct or indirect effects on designated sites.

C.4.1.2 The impact matrix of all nine new settlements and the ranking against biodiversity and geodiversity (SA Objective 3) is presented within **Table C.4.1**.

C.4.2 European sites

C.4.2.1 European sites are a network of areas designated for nature protection which include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. There are no European sites located within the SWLP area, with the nearest being Bredon Hill approximately 10km south east of the Plan area, and Ensor's Pool 14km north of the Plan area. The HRA will identify impact pathways beyond these distances.

C.4.2.2 The impact of all 12 new settlements on European sites is uncertain at this stage, as the conclusions of the HRA are currently unknown. According to the emerging outputs of the HRA process, there is potential for water quality and/or quantity impacts on downstream European sites arising from any development within the SWLP area that will need to be explored further through Appropriate Assessment at the next plan making stage.

C.4.3 Sites of Specific Scientific Interest (SSSI)

C.4.3.1 There are 43 SSSIs located within the SWLP area, including 'Ailstone Old Gravel Pit' SSSI, 'River Blythe' SSSI and 'Oak Tree Farm Meadows' SSSI. Of the 43 SSSIs, the majority are in 'favourable' and 'unfavourable – recovering' condition.

C.4.3.2 New Settlement BW 'is located adjacent to Snitterfield and Bearley Bushes' SSSI. This SSSI has been designated for various bat population assemblages, broad-leaved, mixed and yew woodlands, and populations of the scarce wood white butterfly species (*Lepitidia sinapis*⁵). The large extent of proposed development associated with New Settlement BW will be expected to put the designated features of the Snitterfield and Bearley Bushes SSSI at risk. For instance, increased pollutant levels from vehicle use associated with the development has potential to worsen local air quality. Additionally, New Settlement BW may attract a greater number of visitors for recreational purposes such as dog walking, which has potential to diminish the quality of the SSSI and harm the biodiversity within it. To this end, a major negative score has been identified on SSSIs for New Settlement BW.

⁵ Bearley Village (2019). Warwickshire. Snitterfield and Bearley Bushes. Available at: <https://bearley.org/wp-content/uploads/2019/06/SSSI-designation-of-Snitterfield-and-Bearley-Bushes.pdf> [Date accessed: 11/11/24]

- C.4.3.3 New Settlement F1 is located in close proximity to ‘Harbury Railway Cutting’ SSSI which lies 60m to the south of the indicative boundary. Furthermore, ‘Ufton Fields’ SSSI lies approximately 266m south east of the new settlement and ‘Long Itchington and Ufton Woods’ SSSI is located approximately 340m east of the new settlement, both partially separated by development in Ufton and Ufton Hill Road. The three SSSIs are designated for various biodiversity features, for example the ‘Ufton Fields’ SSSI is designated for important insect and plant populations which includes rare orchids, as well as areas of native woodland⁶. The large scale of development proposed through New Settlement F1 has potential to impact the surrounding SSSIs and their designated features through increased recreational disturbance and air pollution. As such, the new settlement is also located within a SSSI Impact Risk Zone (IRZ) which indicates development of 50 or more dwellings outside existing settlements will need to be consulted on with Natural England. Overall, a minor negative impact is identified for F1 on SSSIs.
- C.4.3.4 Four of the new settlements (A1, A2, F3 and G1) are located further away from SSSIs, however lie within an SSSI IRZ which indicates development proposed at the settlement will need to be consulted on with Natural England. SSSIs near to these four new settlements includes ‘Merriman’s Hill Farm Meadows’ SSSI, ‘Ullenhall Meadows’ SSSI for New Settlement A1, ‘Windmill Naps Wood’ SSSI for New Settlement A2 and ‘River Itchen’ SSSI for New Settlements F3 and G1. Various areas of the SWLP are located within IRZs which flag residential development as a potential threat to nearby SSSIs, particularly within the Stratford-on-Avon District, with smaller areas within the Warwick District. Minor negative impacts are identified for the development of the four new settlements against SSSIs.
- C.4.3.5 The remaining four new settlements (C1, F2, X1 and X2) are unlikely to significantly impact SSSIs, where the proposed development is located within an IRZ which does not identify residential development as a threat to nearby SSSIs.

C.4.4 National Nature Reserves

- C.4.4.1 There are no National Nature Reserves (NNRs) in proximity to any of the 12 new settlements. Therefore, the proposed development is not expected to impact NNRs, and a negligible impact is identified across the 12 new settlements.

⁶ Woodland Trust. Ufton Fields SSSI. Available at: www.woodlandtrust.org.uk/visiting-woods/woods/ufton-fields-sssi/ [Date accessed: 14/10/24]

C.4.5 Ancient woodland

- C.4.5.1** There are several stands of ancient woodland in the SWLP area, particularly within the northern parts of the SWLP area. Four of the new settlements (A1, A2, C1 and F2) contain areas of ancient woodland which forms more than 1% of the indicative settlement area. New Settlement A1 coincides with several stands of ancient woodland which includes 'Mockley wood', 'Round wood' and 'Long wood' that cover approximately 7.7% of the settlement area. New Settlement A2 coincides with 'Clarksland Coppice' and a stand of unnamed ancient woodland to the north of the settlement that cover approximately 2.8% of the settlement area. Approximately 1.7% of New Settlement C1 coincides with 'Rowington Coppice', and 1% of New Settlement F2 with 'Nuns Bushes'. New Settlement F1 is located 350m from 'Long Itchington Wood'. Potential impacts of the large-scale residential development proposed at these four new settlements on ancient woodland could include chemical changes from pollution, disturbance, fragmentation, invasion by non-native plant species and cumulative effects⁷. Development at these four new settlements could potentially result in a major negative impact on ancient woodland. New Settlement A1 will be expected to result in greater impacts, where the settlement has the largest proportion of the land area coincident with ancient woodland, performing the worst for this receptor.
- C.4.5.2** Four New Settlements (B1, BW, F1 and X1) are expected to result in minor negative impacts on ancient woodland. New Settlement B1 partially coincides with 'Green Grove' ancient woodland and other strands of ancient woodland adjacent to the settlement boundary, where 0.5% of the total new settlement area coincides with ancient woodland. New Settlement BW is located adjacent to 'Bearley Bushes West' ancient woodland. New Settlement F1 is located 350m from 'Long Itchington Wood' and New Settlement X1 is located adjacent to 'Wigerlands Wood'. The development at these four settlements could potentially result in direct effects on ancient woodland, such as from increased recreational disturbance or air quality impacts, or potentially fragmentation which is less likely.
- C.4.5.3** There are no ancient woodlands in proximity to the remaining four new settlements (E1, F3, G1, X2) and development will not be expected to impact ancient woodland, and a negligible impact is identified.

⁷ The Woodland Trust (2012). Impacts of nearby development on ancient woodland – addendum. Available at: www.woodlandtrust.org.uk/media/43619/impacts-of-nearby-development-on-the-ecology-of-ancient-woodland-addendum.pdf
[Date accessed: 14/10/24]

C.4.6 Local Nature Reserves

C.4.6.1 There are 14 Local Nature Reserves (LNRs) within the SWLP area. New Settlement F1 is located approximately 270m from the 'Ufton Fields' LNR, which is managed by the Warwickshire Wildlife Trust and includes pools, marshes, grassland, woodland and supports rare species such as the Man Orchid (*Orchis anthropophora*). Additionally, the LNR includes wildlife such as wildflowers, fungi, butterflies, birds such as the Great Spotted Woodpecker (*Dendrocopos major*) and a variety of water life such as toads, newts, dragonflies and damselflies⁸. The LNR is a popular destination for walking, including a circular, waymarked trail providing access to all of the biodiversity features at the site. Development proposed at New Settlement F1 could potentially increase recreational pressures to the 'Ufton Fields' LNR and result in disturbances to the biodiversity features at the LNR. A minor negative impact is identified. New Settlement F1 is expected to perform the worst against this receptor.

C.4.6.2 There are no LNRs in proximity to the remaining 11 new settlements. Development at these locations is not expected to significantly affect LNRs and a negligible impact is identified.

C.4.7 Local Wildlife Sites

C.4.7.1 Local Wildlife Sites (LWSs) are non-statutory biodiversity designations identified by local authorities in partnership with nature conservation charities, statutory agencies and ecologists, often privately owned. Some 250 LWSs are located in and around the SWLP area. All 12 of the new settlements are coincident with at least one LWS. A major negative impact has been identified for the 12 new settlements, where there is potential for direct loss or fragmentation of LWS as well as likely increased recreational pressures as a result of the large-scale residential development proposed. Over 10% of the new settlement area at New Settlement E1 (approximately 18%), New Settlement C1 (approximately 12.6%) and New Settlement F3 (approximately 10.3%) coincides with a LWS and will likely perform the worst against this receptor. New Settlement E1 coincides with five LWS including 'Marchfront Brook Corridor' LWS, 'Long Marston Disused Airfield' LWS and 'Meon Vale' LWS. New Settlement C1 coincides with eight LWS including 'Rowington Coppice' LWS and 'Grand Union Canal' LWS. New Settlement F3 coincides with six LWS including 'Bush Close Spinney' LWS and 'Watergall Fox Covert' LWS. The remaining nine new settlements contain smaller proportions of LWS within the settlement area.

C.4.8 Local Geological Site

C.4.8.1 There are no Local Geological Sites (LGS) in proximity to the 12 new settlements. Development at these locations is not expected to significantly affect LGS and a negligible impact is identified.

C.4.9 Priority habitat

C.4.9.1 There are a wide range of priority habitats within the SWLP area, covering approximately 12% of the Plan area. The most prevalent priority habitats are deciduous woodland and good quality semi-improved grassland, with smaller proportions of lowland meadows and floodplain grazing marsh.

⁸ The Wildlife Trust. Ufton Fields. Available at: www.warwickshirewildlifetrust.org.uk/UftonFieldsWildWalk [Date accessed: 14/10/24]

C.4.9.2 All 12 of the new settlements contain areas of priority habitat and could potentially have a minor negative impact associated with loss or degradation of these priority habitats. New Settlements C1 and F2 contain the highest percentage of priority habitat within their indicative boundaries, approximately 7.3% of New Settlement C1 coinciding with deciduous woodland, good quality semi-improved grassland and traditional orchard, and approximately 6.7% of New Settlement F2 coinciding with deciduous woodland and good quality semi-improved grassland.

Table C.4.1: Impact matrix of new settlements for biodiversity and geodiversity – SA Objective 3

New Settlement	European Site	SSSI	NNR	Ancient woodland	LNR	LWS	Geological site	Priority habitat	SA3 ranking
A1	+/-	-	0	--	0	--	0	-	10 th
A2	+/-	-	0	--	0	--	0	-	9 th
B1	+/-	0	0	-	0	--	0	-	3 rd
BW	+/-	--	0	-	0	--	0	-	12 th
C1	+/-	0	0	--	0	--	0	-	8 th
E1	+/-	0	0	0	0	--	0	-	1 st
F1	+/-	-	0	-	-	--	0	-	11 th
F2	+/-	0	0	--	0	--	0	-	7 th
F3	+/-	-	0	0	0	--	0	-	5 th
G1	+/-	-	0	0	0	--	0	-	6 th
X1	+/-	0	0	-	0	--	0	-	4 th
X2	+/-	0	0	0	0	--	0	-	2 nd

C.4.10 Ranking

C.4.10.1 The proposed development at all new settlements is expected to result in potential adverse impacts for biodiversity, due to the large scale of development posing risks to designated and undesignated biodiversity assets. All biodiversity assets were considered in the ranking of the 12 new settlements, with lesser weighting to priority habitats and LWS due to their presence within all new settlements.

C.4.10.2 New Settlement E1 is identified as the **best performing** new settlement against biodiversity (SA Objective 3). New Settlement E1 does still contain biodiversity assets at risk from new development, with LWS and areas of priority habitat located within the indicative boundary; however, the new settlement coincides with fewer biodiversity assets than the remaining 11 new settlements and will be likely to have a lesser impact on biodiversity. New Settlement X2 performs similarly to New Settlement E1, however has been ranked according to the proportion of priority habitat located within the new settlement, where greater proportions of priority habitat are located within New Settlement X2.

C.4.10.3 Similar effects have been identified for New Settlements B1, F3, G1 and X1. New Settlements B1 and X1 could potentially perform slightly better than F3 or G1, where the new settlements are not expected to result in adverse impacts on SSSIs. Owing to lower proportions of ancient woodland located within New Settlement B1, the settlement is likely to perform slightly better than New Settlement X1. New Settlements F3 and G1 perform similarly, however based on the proportion of LWS and priority habitats within their indicative boundaries, F3 is identified as the better performing of the two where greater proportions of these biodiversity assets are likely to be at risk from development at G1.

- C.4.10.4 New Settlements C1 and F2 perform similarly, however have been ranked based on the proportion of ancient woodland, LWS and priority habitats within the indicative areas, where greater proportions of these biodiversity assets are likely to be at risk from development at New Settlement C1.
- C.4.10.5 Development at New Settlements A1 and A2 will have potential to result in impacts on various biodiversity assets and therefore little separates the two new settlements in the ranking. Based on the proportion of ancient woodland, LWS and priority habitats within the indicative boundaries for new settlements, A2 is identified to perform better than A1.
- C.4.10.6 New Settlement BW is identified as the **worst performing** against SA Objective 3. Development at New Settlement BW will be likely to increase the risk of recreational disturbances and other impacts such as air and water pollution to various biodiversity assets, including potential for a major negative impact on ‘Snitterfield and Bearley Bushes’ SSSI. New Settlement F1 performs similarly to New Settlement BW and is also expected to result in adverse effects on biodiversity assets where the settlement lies in close proximity to ancient woodland and ‘Ufton Fields’ LNR, as well as several SSSIs.

C.4.11 Mitigation

- C.4.11.1 In accordance with the mitigation hierarchy, avoidance should be used wherever possible to prevent adverse effects on biodiversity; this can be achieved through appropriate design and layout of the proposed development and in regard to selecting the most appropriate new settlement. Due to the large size of the new settlements, development should also be informed by ecological surveys and ensure that development maintains important wildlife corridors and habitat connectivity. Development at the new settlements should consider the Building with Nature Standards⁹ to ensure that development incorporates wildlife into placemaking.
- C.4.11.2 Impacts as a result of the proposed development at the 12 new settlements on biodiversity could be mitigated through the use of green buffers. Natural England’s guidance for buffers for ancient woodland¹⁰ should be used to mitigate any potential adverse effects on ancient woodland. Furthermore, where 40% of the new settlement area is to be used for GI, it is expected that impacts on biodiversity assets can be avoided through appropriate design and layout.

⁹ Building with Nature Standards. Building with Nature. Standards Framework (BwN 2.0) Available at: https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/6351513d1afee236d4cf6ce8/1666273600232/Building_wit_h_Nature_Standards_Framework_2.0_Oct22_Download_Version.pdf [Date accessed: 05/11/24]

¹⁰ Natural England (2022). Ancient woodland, ancient trees and veteran trees: advice for making planning decisions. Available at: www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#:~:text=For%20ancient%20or%20veteran%20trees,15%20times%20the%20tree's%20diameter. [Date accessed: 31/10/24]

- C.4.11.3 Similarly, conserving, enhancing and providing nature recovery networks can generate opportunities for biodiversity to thrive alongside new development. The Warwickshire, Coventry and Solihull Local Nature Recovery Strategy (LNRS)¹¹ is currently in progress which aims to improve links and quality of green spaces in urban areas and ensure specific proposals are implemented for improving habitat provision. Where new developments have potential to deplete ecological networks, a focus should be given to creating new networks within the boundary of the new settlement, and restoring habitat networks in the connecting area.
- C.4.11.4 Whilst it is expected that development at the 12 new settlements will meet the requirements of biodiversity net gain (BNG) which would provide an uplift at each new settlements, many of the habitats covered under each receptor are irreplaceable and once they have been lost to development they will not regenerate or recover. The incremental loss of these habitats will result in significant cumulative adverse impacts for which mitigation will not be expected to be sufficient.

¹¹ Warwickshire, Coventry and Solihull LNRS (2024) Warwickshire, Coventry and Solihull Local Nature Partnership. Available at: <https://wcslnp.wixsite.com/localnature/lnrs> [Date accessed 04/11/24]

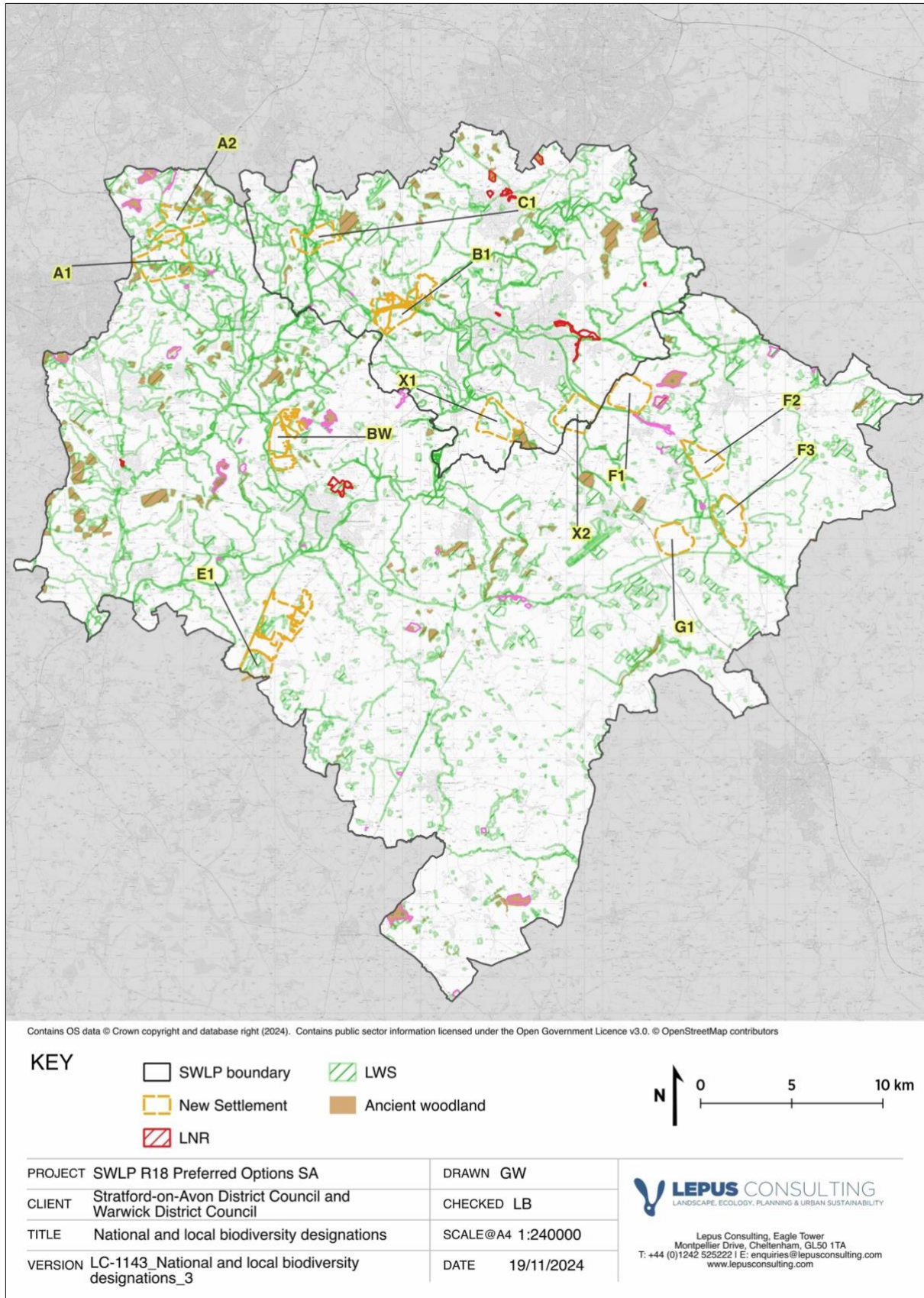


Figure C.4.1: National and local biodiversity designations within the SWLP area

C.5 SA Objective 4: Landscape

C.5.1 Overview

- C.5.1.1 The SWLP area has a strong rural character with a high-quality landscape and countryside. The Cotswold National Landscape is located to the south of the SWLP area. The Cotswold National Landscape cuts across 15 local authority areas and is the third largest protected landscape in England¹².
- C.5.1.2 Three Country Parks (CPs) are located within the Plan area, including ‘Burton Dasset’ and ‘Newbold Comyn’ CPs, and ‘Ryton Pools’ CP that is located partially within the SWLP area to the north. Furthermore, areas identified as Special Landscape Areas (SLAs) are located across the Plan area and contribute to the surrounding landscape character (see **Figure C.5.2**). There are four SLAs within the SWLP which cover large areas of the Plan area and are made up of various landscape features: ‘Arden’, ‘Feldon Parkland’, ‘Cotswold Fringe’ and ‘Ironstone Hill’. The 12 new settlements include large areas of undeveloped land, predominantly used for agriculture, which may contribute to the landscape character and landscape features of the Plan area.
- C.5.1.3 The impact matrix of all 12 new settlements and the ranking against landscape (SA Objective 4) is presented within **Table C.5.1**.

C.5.2 Cotswolds National Landscape

- C.5.2.1 The Cotswolds National Landscape is located to the south of the SWLP area (see **Figure C.5.1**). New Settlement E1 is located at its closest point 45m away from the Cotswolds National Landscape, and is expected to have the capacity for approximately 9,850 dwellings. As a result, the new settlement is likely to have a direct impact on views from the north of the Cotswolds National Landscape, significantly detracting from short-reaching views, and potentially altering the landscape setting. A major negative impact is identified for New Settlement E1 on landscape.
- C.5.2.2 The remaining 11 new settlements are not expected to significantly impact the character or setting of the Cotswolds National Landscape. New Settlement G1 is located approximately 3.8km north of the National Landscape, where significant impacts on views or the landscape setting are less likely. A negligible impact is identified for the remaining 11 new settlements against this receptor.

C.5.3 Landscape Character Assessment

- C.5.3.1 The Warwickshire Landscape Guidelines 1993 and National Character Area profiles¹³ were used to identify settlements which are located in areas which have potential to be discordant with the surrounding landscape character.

¹² Cotswold National Landscape (2023). Cotswold National Landscape Management Plan 2023–2025. Available at: <https://www.cotswolds-nl.org.uk/planning/cotswolds-aonb-management-plan/> [Date accessed: 15/11/24]

¹³ Natural England (2014) National Character Area Profiles. Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles> [Date accessed: 15/11/24]

- C.5.3.2 All 12 new settlements comprise large areas of undeveloped land, where the introduction of a significant quantity of new development could potentially lead to the loss or degradation of key landscape features that contribute to the current landscape character.
- C.5.3.3 New Settlements A1, A2, B1, BW and C1 are located within the Arden regional character area, which is characterised by ancient woodlands, mature hedgerow oaks, and a dispersed settlement pattern of brick and half-timbered farmsteads and wayside cottages. New Settlement A1 is located within the ‘Arden Pastures’ landscape type and includes key features such as ancient woodland, mature hedgerow oaks and the irregular pattern of small to medium sized fields. New Settlement A2 is located within the ‘Ancient Arden’ landscape type and includes key features such as ancient woodland and mature hedgerow oaks and an irregular pattern of small to medium sized fields. New Settlement B1 is located within the ‘Wooded Estatelands’ landscape type and includes key features such as semi-regular pattern of medium-large sized fields and scattered farmsteads. New Settlement BW is located within the ‘Wooded Estatelands’ landscape type and includes key features such as semi-regular pattern of medium to large sized fields. New Settlement C1 is located within the ‘Ancient Arden’ landscape type and includes key features such as small fields bordered with hedgerow trees.
- C.5.3.4 New Settlement E1 is located within the Avon Valley regional character area, which is characterised by historic market towns, nucleated villages and orchards. New Settlement E1 is located within the ‘Vale Farmlands’ landscape type and includes key features such as open hedged agricultural landscape.
- C.5.3.5 New Settlements F1, F2, F3, G1, X1 and X2 are located within the Feldon regional character area, which is characterised by heavy clay soils, and a nucleated settlement pattern of small rural villages. New Settlements F1, F3, G1 and X2 are located within the ‘Vale Farmlands’ landscape type and all four new settlements include key features such as flat open hedged landscapes with few roads or settlements. New Settlement F2 is located within the ‘Lias Village Farmlands’ landscape type and includes key features such as hedgerow and roadside trees. New Settlement X1 is located within ‘Feldon Parklands’ landscape type and includes key features such as small coverts and belts of trees, mature hedgerow and roadside oaks.
- C.5.3.6 The proposed development at all 12 new settlements has potential to lead to the loss or degradation of the key landscape features described in the published Arden landscape map and guidelines (1993)¹⁴ and Avon Valley, Feldon, Cotswolds landscape map and guidelines¹⁵. Overall, a minor negative impact on the landscape character is identified for all 12 new settlements.

¹⁴ Warwickshire County Council (1993). Arden landscape map. Available at: <https://www.warwickshire.gov.uk/landscapeguidelines> [Date accessed: 19/11/24]

¹⁵ Warwickshire County Council (1993). Avon Valley, Feldon, Cotswolds landscape map. Available at: <https://www.warwickshire.gov.uk/landscapeguidelines> [Date accessed: 19/11/24]

C.5.4 Landscape Sensitivity

C.5.4.1 All 12 new settlements are located outside of the currently published Landscape Sensitivity study areas. Therefore, at this stage of plan making the potential effects of each new settlement on sensitive landscapes are uncertain. It is recommended that landscape sensitivity assessments are undertaken to allow for evaluation between the different new settlement options to aid the identification of preferred locations of new settlements in areas that will avoid or minimise harm to sensitive landscapes.

C.5.5 Special Landscape Areas (SLA)

C.5.5.1 New Settlements A1 and A2 are located wholly within the 'Arden' SLA. The key qualities of the Arden SLA include a varied undulating topography with steep scarp slopes and river valleys, a range of field patterns, woodlands forming the skyline, lanes and tracks with strong hedgerows and oaks, and settlement on valley floors or hilltops¹⁶. Both New Settlements A1 and A2 are comprised of undeveloped land with a range of field patterns and woodlands that may currently contribute to the key qualities of the SLA. The large-scale loss of land through the development of the two new settlements will be expected to have a major negative impact on the SLA. New Settlement BW is situated where small parcels coincide with the Arden SLA. As only small portions of the new settlement overlap with the Arden SLA, the new settlement is expected to have a minor negative impact on the Arden SLA.

C.5.5.2 New Settlements F3 and G1 are located in close proximity to the 'Ironstone Hill' SLA, located 620m from New Settlement F3 and 450m from New Settlement G1. The key qualities of the Ironstone Hill SLA include a rolling landscape including occasional prominent ironstone hills, ridges and slopes, medium to large scale regular strongly hedged field patterns with occasional trees, mixed farmland, occasional woodlands and sparse settlement pattern of small, nucleated villages¹⁷. Both new settlements comprise large areas of undeveloped land with hedged field patterns with occasional trees that may currently contribute to the key qualities of the SLA. The large-scale loss of land through the development of the two new settlements will be expected to have a minor negative impact on the SLA.

C.5.5.3 The remaining seven new settlements (B1, E1, C1, F1, F2, X1 and X2) are located beyond the visual envelope of the SLAs and will be expected to have a negligible impact on SLAs.

¹⁶ White consultants (2012). Special Landscape Areas Study for Stratford-on-Avon District Council. Final Report. Available at: www.stratford.gov.uk/doc/205823/name/ED4112%20Special%20Landscape%20Areas%20Study%20June%202012.pdf [Date accessed: 15/10/24]

¹⁷ Ibid

C.5.6 Country Park

- C.5.6.1 New Settlements F3 and G1 are located in close proximity (2.6km and 850m, respectively) to the 'Burton Dasset' CP. The Burton Dasset CP provides long-range views over the surrounding countryside and comprises unspoilt, rolling hills and a small woodland with a surfaced footpath which is mainly pine¹⁸¹⁹. Both new settlements comprise large areas of undeveloped land that may be visible from and contribute to the setting of the CP. The large-scale loss of land through the development of the two new settlements will be expected to have a minor negative impact on the setting of the CP.
- C.5.6.2 The remaining ten new settlements are not expected to impact any CPs within the SWLP area or their settings. A negligible impact on CPs is identified for these ten new settlements.

C.5.7 Views from the public rights of way network

- C.5.7.1 An extensive network of public rights of way (PRoW) covers the SWLP area, including footpaths and a small proportion of bridleways, byways and unclassified roads. Given the widespread network of PRoW and the predominantly open countryside character within the Plan area, it is expected the large-scale development proposed at all 12 new settlements will have potential to impact current high-quality views experienced by users of the PRoW network. PRoWs pass through all 12 new settlements. A minor negative impact on the PRoW network is identified for all new settlements.

C.5.8 Coalescence

- C.5.8.1 The proposed development at 11 of the new settlements (A1, A2, B1, BW, C1, E1, F1, F2, F3, G1, X1 and X2) will be expected to contribute towards reduced separation between existing settlements within the SWLP area. The new settlements will be likely to increase the risk of coalescence between existing settlements, including Aspley Heath, Woodend and Tanworth-in-Arden for New Settlement A1 and A2, Hatton and several small settlements for B1, Wilmcote and Bearley for BW, Kingswood and Turners Green for New Settlement C1, Long Marston and several small settlements for E1, Ufton and Harbury for New Settlement F1, Ladbroke, Bishop's Itchington and Deppers Bridge for New Settlement F2, Knightcote, Watergall and Fenny Compton for New Settlement F3, Knightcote, Northend and Gaydon for New Settlement G1 and Bishop's Tachbrook and Barford for New Settlement X1. A minor negative impact on coalescence has been identified for the eight new settlements.
- C.5.8.2 Given its distance from existing settlements, New Settlement X2 is not expected to lead to coalescence and therefore a negligible impact has been identified against this receptor.

¹⁸ Warwickshire County Council. Warwickshire Country Parks. Burton Dasset Hills. Available at: <https://countryparks.warwickshire.gov.uk/homepage/4/burton-dassett-hills> [Date accessed: 15/10/24]

¹⁹ Woodland Trust. Burton Dasset Hills Country Park. Warwickshire, Warwickshire County Council Wood. Available at: <https://www.woodlandtrust.org.uk/visiting-woods/woods/burton-dassett-hills-country-park/> [Date accessed: 15/10/24]

Table C.5.1: Impact matrix of new settlements for landscape – SA Objective 4

New Settlement	Cotswold National Landscape	Landscape Character Assessment	Landscape Sensitivity	Special Landscape Areas	Country Park	Views from the PRoW network	Coalescence	SA4 ranking
A1	0	-	+/-	--	0	-	-	11 th
A2	0	-	+/-	--	0	-	-	10 th
B1	0	-	+/-	0	0	-	-	5 th
BW	0	-	+/-	-	0	-	-	7 th
C1	0	-	+/-	0	0	-	-	4 th
E1	--	-	+/-	0	0	-	-	12 th
F1	0	-	+/-	0	0	-	-	3 rd
F2	0	-	+/-	0	0	-	-	6 th
F3	0	-	+/-	-	-	-	-	8 th
G1	0	-	+/-	-	-	-	-	9 th
X1	0	-	+/-	0	0	-	-	2 nd
X2	0	-	+/-	0	0	-	0	1 st

C.5.9 Ranking

C.5.9.1 The proposed development at all 12 new settlements is expected to result in potential adverse impacts for the local landscape, due to the large scale of development. All landscape receptors were considered in the ranking of the 12 new settlements, with lesser weighting to the impacts of development on landscape character and views from the PRoW network priority due to the likelihood of all new settlements resulting in minor negative impacts for these receptors.

C.5.9.2 New Settlement X2 is identified as the **best performing** new settlement against landscape (SA Objective 4). New Settlement X2 is the only new settlement identified to not result in coalescence between existing settlements and will not be expected to result in any significant adverse impacts on the Cotswold National Landscape, SLAs or country parks.

- C.5.9.3 New Settlements B1, C1, F1, F2 and X1 are difficult to separate in the ranking. All five new settlements have potential to result in adverse impacts on landscape character, views from the PRoW network and coalescence. New Settlement F2 is likely to perform the worst out of the five new settlements, where development is likely to increase the risk of coalescence between three existing settlements. New Settlement B1 is more likely to result in greater adverse impacts than C1, F1 or X1, as it will increase risk of coalescence between Hatton and several smaller settlements such as Little Shrewley, compared to the potential for reducing separation between fewer settlements at the other three new settlements. New Settlements C1, F1 and X1 have been separated in the ranking based on the scale of adverse impacts which will be expected in terms of change to the landscape character. New Settlement C1 will be expected to result in greater adverse impacts on landscape character than New Settlements F1 and X1, where New Settlement C1 almost entirely comprises of small fields bordered with hedgerow trees, a key characteristic of the 'Ancient Arden' landscape type within the Arden regional character area. New Settlement X1 performs slightly better than New Settlement F1, where F1 comprises of an entirely open hedged landscape, with few roads or settlements, which are identified as key characteristics of the 'Vale Farmlands' landscape type. New Settlement X1 includes key characteristics such as small coverts and belts of trees, mature hedgerow and roadside oaks of the 'Feldon Parklands' landscape type, however these characteristics are not located across the entire new settlement.
- C.5.9.4 New Settlements BW, F3 and G1 are all expected to result in adverse impacts on landscape character, SLAs, views from the PRoW network and coalescence. New Settlement BW could be seen to perform better than F3 and G1, as it is the only settlement option of the three that is not expected to result in adverse impacts on a country park. New Settlements F3 and G1 are difficult to separate, however New Settlement F3 could potentially result in less adverse effects on the landscape, where New Settlement G1 is located closer to Burton Dasset CP, located 850m from the CP in comparison to New Settlement F3 which is located 2.6km from the CP. Furthermore, New Settlement G1 is located 450m from Ironstone Hill SLA compared to New Settlement F3 which is located 620m from Ironstone Hill SLA.
- C.5.9.5 New Settlements A1 and A2 are difficult to separate in the ranking, where both new settlements are likely to result in adverse impacts on the local landscape character, views from the PRoW network and coalescence. New Settlements A1 and A2 are also expected to result in significant adverse impacts on SLAs. The two new settlements are separated in the ranking based on the scale of adverse impacts which will be expected in terms of change to the landscape character. New Settlement A1 is identified to perform slightly worse than New Settlement A2, where larger areas of ancient woodland are located within the settlement, which is identified as a key characteristic of the Arden regional character area.
- C.5.9.6 New Settlement E1 is identified as the **worst performing** new settlement against landscape (SA Objective 4). New Settlement E1 is likely to result in adverse impacts on the local landscape character, views from the PRoW network and coalescence. Additionally, New Settlement E1 is likely to result in significant adverse impacts on the special qualities and setting of the Cotswold National Landscape which is located 45m from the new settlement boundary.

C.5.10 Mitigation

- C.5.10.1 Development at the 12 new settlements should first avoid any impacts on sensitive features through appropriate siting of built development, layout and design. Development proposed as part of a new settlement should also undertake appropriate landscape surveys, including a Landscape Sensitivity Assessment (LSA). An LSA is the process of assessing the resilience, or robustness of landscape character and the visual resource (and valued characteristics) to defined change or changes arising from development proposals. It can help decision makers to understand likely changes and the nature of change should the development scenarios be taken forward. It is also advised that as development progresses to planning application stages, it should be informed by a Landscape and Visual Impact Assessment (LVIA) which will identify visual impacts the development may have on the local landscape, with the findings used to inform the maintenance and enhancements of key views, which will be particularly useful for the new settlements due to their size and rural location.
- C.5.10.2 Development could mitigate impacts on the local landscape using landscape-led site design practices, including buffers and high-quality design such as appropriate height and building materials to avoid or reduce harm to sensitive landscape features. Implementing soft landscaping which will help to ensure coalescence is avoided, reducing the distinct boundary between rural and urban areas. Furthermore, where 40% of the new settlement area is to be used for GI, it is expected that impacts on the landscape can be avoided through appropriate design and layout.
- C.5.10.3 The development of a new settlement provides an opportunity to create a sense of identity and distinctiveness. Landscape-led development will ensure that the large-scale loss of undeveloped land can provide the opportunity to create a new coherent neighbourhood that is well designed and complements the wider landscape setting. New settlements should make use of the National Design Guide²⁰ which provides recommendations on how design at all levels can shape the character of a new place. Furthermore, local design guides such as the the Warwickshire Design Guide²¹ should be used, which seeks to provide designers and developers with direction and guidance through which they are able to ensure development is in-keeping with the setting of the surrounding landscape. Both guides will help to mitigate against adverse impacts which could arise on the landscape if development design is not thoroughly informed and can help with the place making of a new settlement. Under Draft Policy Direction 26 – Design Codes, the South Warwickshire Councils are intending to develop design codes reflecting site and settlement specifics that will be helpful in this regard.

²⁰ DLUHC (2021). National Design Guide. Available at:
https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf [Date accessed: 05/11/24]

²¹ Warwickshire County Council (2024) Warwickshire Design Guide. Available at:
<https://www.warwickshire.gov.uk/warwickshiredesignguide> [Date accessed: 05/11/24]

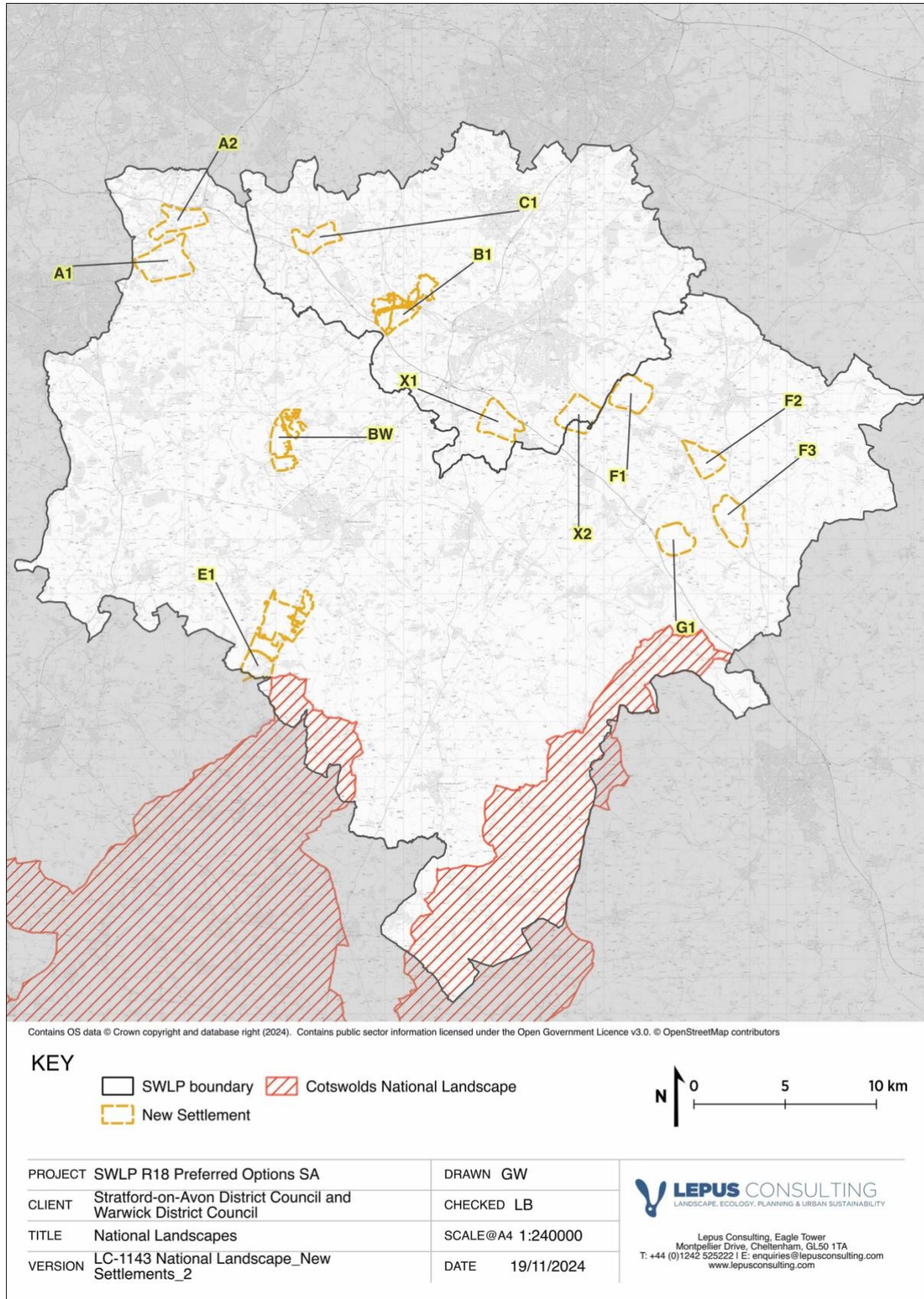


Figure C.5.1: Location of the Cotswolds National Landscape in relation to the SWLP area

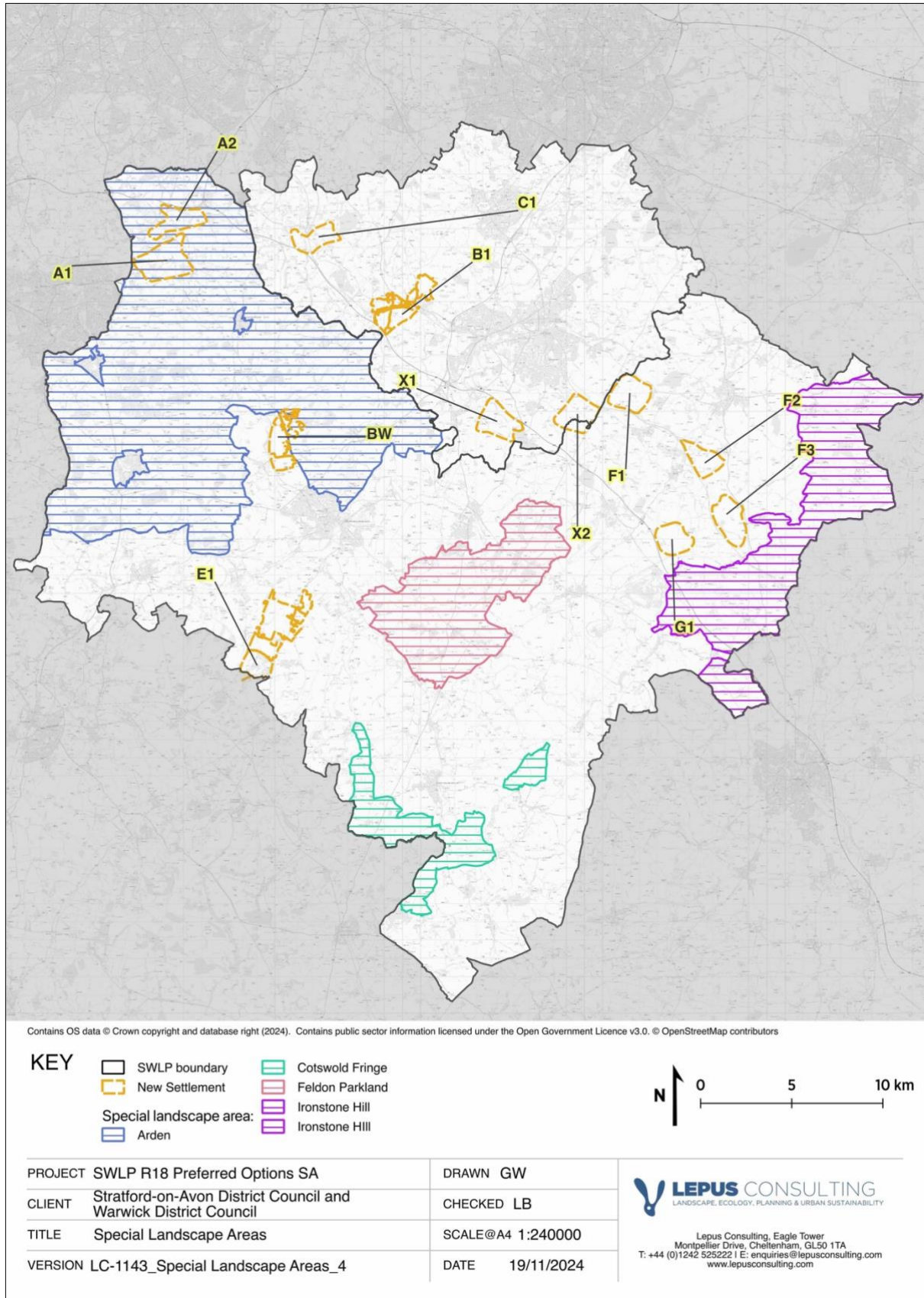


Figure C.5.2: Special landscape areas within the SWLP area

C.6 SA Objective 5: Cultural heritage

C.6.1 Overview

- C.6.1.1 A wide range of designated statutory and non-statutory heritage assets, including Listed Buildings (LBs), Registered Parks and Gardens (RPGs), Scheduled Monuments (SMs), and Conservation Areas (CAs) can be found within South Warwickshire (see **Figure C.6.1** and **Figure C.6.2**).
- C.6.1.2 The impact matrix of all 12 new settlements and the ranking against cultural heritage (SA Objective 5) is presented within **Table C.6.1**.

C.6.2 Grade I Listed Buildings

- C.6.2.1 There are 97 Grade I LBs located throughout the SWLP area. New Settlement A1 is located 90m from 'Church of St Mary Magdalene' and New Settlement C1 is located 90m from 'Baddesley Clinton House and Bridge over Moat'. Both the new settlements comprise large areas of undeveloped land and therefore the introduction of a significant amount of new development will have potential to lead to a major negative impact on the current rural setting of these Grade I LBs.
- C.6.2.2 New Settlement F2 is located entirely on undeveloped land and is located 220m from 'Church of all Saints' which is on the heritage at risk register and is in "fair" condition²². Development at this location will have potential to impact the setting of this Grade I Listed Building. A minor negative impact is identified, considering that some existing development on the edge of Ladbroke surrounds the Grade I LBs.
- C.6.2.3 New Settlement A2 is located 360m from the 'Church of St Mary Madalene', however the new settlement is separated from the LB by intervening development in Tanworth-in-Arden and the development is unlikely to significantly impact the setting of the LB. New Settlement E1 is located 315m from the 'Church of St James the Great', however the views from the LB are unlikely to be impacted by development. Overall, a negligible impact is identified at these two new settlements.
- C.6.2.4 The remaining eight new settlements (B1, BW, E1, F1, F3, G1, X1 and X2) are not expected to impact the setting or features of a Grade I LB and a negligible impact is identified.

C.6.3 Grade II* Listed Buildings

- C.6.3.1 There are 249 Grade II* LBs located throughout the SWLP area. New Settlement A2 is located 350m from the 'Umberslade Hall' and New Settlement C1 is located 120m from 'Church of St Michael'. The development at the new settlements will be expected to significantly impact the setting of these Grade II* LBs. Both the new settlements are located on large areas of undeveloped land and therefore the introduction of a significant amount of new development will have potential to lead to a major negative impact on the current rural setting of these Grade II* LBs.

²² Historic England. Heritage at Risk register. Church of all Saints, Church Road, Ladbroke – Stratford on Avon. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/21800> [Date accessed: 16/10/24]

C.6.3.2 New Settlement F1 is located 187m from the 'Church of St Michael' in Ufton, partially separated by existing development. New Settlement B1 is located adjacent to 'Holy Trinity Church' in Hatton and is also located 70m from 'The Old Vicarage' which is partially separated by existing development. New Settlement E1 sits 170m from 'The Goodwins'. Development at these three new settlements will have potential to result in a minor negative impact on the setting of these LBs.

C.6.3.3 The remaining seven new settlements (A1, BW, F2, F3, G1, X1 and X2) are not expected to impact the setting or features of a Grade II* LB and a negligible impact is identified.

C.6.4 Grade II Listed Building

C.6.4.1 There are 4,479 Grade II LBs within the SWLP area. The development at all 12 new settlements will have potential to affect the setting of one or more Grade II LBs. New Settlements A1, A2, B1, BW, C1, E1, F3 and X1 coincide with one or more Grade II LBs and New Settlements F1 and F2 are located adjacent to Grade II LBs. For example, New Settlement A2 coincides with 10 Grade II LBs including 'Hill Farm Cottage', 'Tom Hill Cottage', 'Brook House Farm' and 'Beaumont Hill Farmhouse' and New Settlement C1 coincides with seven Grade II LBs which includes 'Kingswood Manor House' and 'Brome Hall Farmhouse'. New Settlement F1 is located adjacent to 'Town Farmhouse', 'Colbourne House' and '1 and 2 Ufton Fields' and New Settlement F2 is located adjacent to 'Deppers Bridge Farmhouse' and 'Milestone at National Grid'. The development at these seven new settlements will have potential to significantly impact the current rural setting of various LBs and therefore a major negative impact is identified.

C.6.4.2 New Settlement G1 is located in close proximity to 'Green Farmhouse' which is located 465m from the new settlement and the associated LB 'Cottage' located 40m west of the Green Farmhouse LB. New Settlement G1 is also located in close proximity to various Grade II LBs within Knightcote and Gaydon. New Settlement X2 is located approximately 610m from 'Harbury Fields Farmhouse' and approximately 850m from 'Wiggerland Wood Farmhouse' and associated LB named 'Barn', 'Stable' and 'Cartshed'. Both New Settlements G1 and X2 comprise large areas of undeveloped land and development at these locations will be expected to impact the settings of these Grade II LBs. A minor negative impact is identified.

C.6.5 Registered Parks and Gardens and Registered Battlefields

C.6.5.1 There are 28 RPGs within the SWLP area, including two Grade I RPGs named 'Farnborough Hall' and 'Warwick Castle'. There is also one Historic Battlefield within the SWLP area, which is the site of the 'Battle of Edgehill 1642'. None of the new settlements are expected to impact the setting of this Historic Battlefield.

C.6.5.2 New Settlement C1 partially coincides with 'Baddesley Clinton Hall' RPG and is located approximately 630m from 'Wroxley Abbey' RPG. Baddesley Clinton Hall RPG includes a moated manor house with late medieval, Tudor and 20th-century history, gardens and parklands²³. New Settlement C1 comprises a large undeveloped area and development in this location will be expected to significantly impact the features and setting of these RPGs. A major negative impact is therefore identified on RPGs for New Settlement C1.

²³ National Trust. Baddesley Clinton. Available at: <https://www.nationaltrust.org.uk/visit/warwickshire/baddesley-clinton> [Date accessed: 16/10/24]

C.6.5.3 The remaining 11 new settlements (A1, A2, B1, BW, E1, F1, F2, F3, G1, X1 and X2) are not expected to impact the features or setting of an RPG.

C.6.6 Conservation Areas

C.6.6.1 There are 24 conservation areas (CA) identified within Warwick District and 76 identified within Stratford-on-Avon District, with a total of 100 conservation areas across the SWLP area.

C.6.6.2 Five new settlements (A1, A2, BW, F2 and X1) are located in areas which will be expected to impact the setting of a conservation area, primarily covering rural villages and isolated settlements. New Settlements A1 and A2 partially coincide with and are largely adjacent to ‘Tanworth-in-Arden’ CA to the north of A1 and south of A2. The Tanworth-in-Arden CA includes key features such as the St Mary Magdalene Church, the village green, Aspley House, The Doctor’s House, The Bell Inn, The Bank House, The Old Vicarage and the Village Hall²⁴. New Settlement F2 partially coincides and is largely adjacent to ‘Ladbroke’ CA located to the south of the new settlement. The Ladbroke CA includes key features such as fine trees, an open area of parkland north of Ladbroke Hall and winding lanes and dense vegetation which provide enclosure²⁵. New Settlement X1 is located 560m from the ‘Barford’ CA. The Barford CA includes significant open areas such as the Village Green, the character of the river frontage and the playing fields, open areas and grounds around Barford House²⁶. New Settlement BW partially coincides with ‘Bearley’ CA. The Bearley CA includes distinct developed areas and areas of open space and includes key features such as the St Mary the Virgin Church and church yard, The Manor House and Church Lane “loop”²⁷. New Settlements A1, A2, BW, F2 and X1 are all located on large undeveloped land where new development will be expected to impact the character and setting of these conservation areas and therefore result in a minor negative impact on the conservation area.

C.6.6.3 The remaining seven new settlements (B1, C1, E1, F1, F3, G1 and X2) are located beyond the visual envelope of a CA and are not expected to impact the setting of a CA.

C.6.7 Scheduled Monument

C.6.7.1 There are 128 Scheduled Monuments (SMs) within the SWLP area, including various historic camps, earthworks and settlement remains, including ‘Alcester Abbey’ SM in Stratford-on-Avon District and ‘Castle Bridge’ SM in Warwick District.

²⁴ Stratford-on-Avon District Council (1994). Conservation Area Reviews. Tanworth in Arden. Available at: <https://www.stratford.gov.uk/doc/209913/name/tanworth%20in%20arden%20Conservation%20Area%20Review%20with%20discclaimer.pdf> [Date accessed: 22/10/24]

²⁵ Roger Evans Associates (1997). Labroke Conservation Area Review. Available at: <https://www.stratford.gov.uk/doc/209906/name/Ladbroke%20Conservation%20Area%20Review%20with%20discclaimer.pdf> [Date accessed: 22/10/24]

²⁶ Warwick District Council. Barford Conservation Area. Available at: https://www.warwickdc.gov.uk/downloads/file/486/barford_conservation_area [Date accessed: 16/10/24]

²⁷ Bearley Village (1994). Bearley Conservation Area Study January 1994. Available at: <https://bearley.org/supporting-documents/> [Date accessed: 12/11/24]

- C.6.7.2 New Settlement X2 partially coincides with the ‘Roman rural settlement at Windmill Hill Farm’ along the southern boundary of the new settlement. The CA survives as the earthwork and buried remains of a small fortified Roman settlement²⁸. New Settlement X2 comprises a large undeveloped area and development in this location will be expected to significantly impact the features and setting of the SM. Therefore, a major negative impact is identified on SMs.
- C.6.7.3 Two new settlements (C1 and X1) are located within close proximity to SMs and will have potential to impact their settings. New Settlement C1 is located within close proximity to ‘Baddesley Clinton Hall Moated Site and Fishponds’ SM, which dates back to the medieval period and survives as an earthwork²⁹. The SM also includes a lakeside walk, cafe, shop and allows dogs to be walked across the estate, and the area also includes part of the Forest of Arden which includes ancient oak and lime trees³⁰. New Settlement X1 is located 430m from ‘Oakley Wood Camp’ SM, which is the possible site of an Iron Age Hillfort and is part of a complex of ditched and banked earthworks in and surrounding Oakley Wood³¹. The large-scale development at the two new settlement is likely to impact the features and the settings of the SMs, and a minor negative impact is identified.
- C.6.7.4 The remaining nine new settlements (A1, A2, B1, BW, E1, F1, F2, F3 and G1) are not considered to impact any SMs or their setting. A negligible impact on SM is identified.

²⁸ Historic England. Roman rural settlement at Windmill Hill Farm. Available at: <https://historicengland.org.uk/listing/the-list/list-entry/1020259?section=official-list-entry> [Date accessed: 16/10/24]

²⁹ Our Warwickshire. Baddesley Clinton Hall Moat. Available at: https://www.ourwarwickshire.org.uk/content/catalogue_her/baddesley-clinton-hall-moat#:~:text=Access%20to%20the%20moated%20island.owned%20by%20the%20Brome%20family. [Date accessed: 18/10/24]

³⁰ National Trust. Baddesley Clinton. Available at: <https://www.nationaltrust.org.uk/visit/warwickshire/baddesley-clinton> [Date accessed: 18/10/24]

³¹ Our Warwickshire. Oakley Wood Camp. Available at: https://www.ourwarwickshire.org.uk/content/catalogue_her/oakley-wood-camp [Date accessed: 18/10/24]

Table C.6.1: Impact matrix of new settlements for cultural heritage – SA Objective 5

New Settlement	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Registered Parks and Gardens	Conservation Area	Scheduled Monument	SA5 ranking
A1	--	0	--	0	-	0	11 th
A2	0	--	--	0	-	0	10 th
B1	0	-	--	0	0	0	6 th
BW	0	0	--	0	-	0	3 rd
C1	--	--	--	--	0	-	12 th
E1	0	-	--	0	0	0	7 th
F1	0	-	--	0	0	0	4 th
F2	-	0	--	0	-	0	9 th
F3	0	0	--	0	0	0	2 nd
G1	0	0	-	0	0	0	1 st
X1	0	0	--	0	-	-	8 th
X2	0	0	-	0	0	--	5 th

C.6.8 Ranking

- C.6.8.1 All 12 new settlements are identified to have potential to result in adverse impacts on heritage assets, due to the large scale of development proposed. However, some of the new settlements are expected to result in adverse effects on a greater number of heritage assets, or potentially more severe impacts, than others. All heritage assets were considered in the ranking of the 12 new settlements, with lesser weighting to Grade II LBs due to all 12 of the new settlements having been identified as potentially causing adverse impacts on Grade II LBs and their settings. Grade I LBs are of “*exceptional interest*” and therefore are of higher significance when compared to a Grade II* of “*more than special interest*” or Grade II of “*special interest*”³² and as a result have been granted greater weighting in the ranking.
- C.6.8.2 New Settlement G1 is identified as the **best performing** new settlement against cultural heritage (SA Objective 5). The new settlement is located away from the majority of heritage assets; however, the new settlement is located in close proximity to several Grade II LBs. It is more likely that impacts on cultural heritage at New Settlement G1 could be avoided or reduced through design and layout of development.
- C.6.8.3 New Settlement F3 is also located away from the majority of heritage assets; however, the indicative boundary for the new settlement coincides with several Grade II LBs where there is greater potential for development to significantly impact their settings.
- C.6.8.4 New Settlements BW, F1 and X2 perform similarly against cultural heritage. New Settlement BW performs slightly better than F1; development at both locations could significantly affect the setting of Grade II LBs, however New Settlement BW is identified to perform better than New Settlement F1 which could also affect the setting of a Grade II* LB. New Settlement F1 will in turn be expected to perform slightly better than New Settlement X2 which partially coincides with a SM.

³² Historic England (2024). What are Listed Buildings? Available at: <https://historicengland.org.uk/listing/what-is-designation/listed-buildings/> [Date accessed: 22/10/24]

- C.6.8.5 New Settlements B1 and E1 are likely to impact the setting of a Grade II* LB and could also significantly impact the features and settings of a Grade II LB. New Settlement B1 is located adjacent to a Grade II LB, however New Settlement E1 coincides with multiple LBs and could therefore lead to greater impacts on Grade II LBs.
- C.6.8.6 There is little separating New Settlement F2 and X1 regarding ranking against cultural heritage. Both new settlements have potential to impact the features and settings of several heritage assets, however New Settlement X1 is expected to perform better than New Settlement F2 that is expected to impact the setting of a Grade I LB.
- C.6.8.7 New Settlement A2 performs slightly better than A1; development at both locations could potentially affect the setting of a CA and various Grade II LBs, however, New Settlement A1 will also be expected to significantly impact the setting of 'St Mary Magdalene' Grade I LB, which is likely to be of higher historic importance and potentially more sensitive than the Grade II* Listed 'Umberslade Hall' which may be affected by New Settlement A2.
- C.6.8.8 New Settlement C1 is likely to be the **worst performing** new settlement against cultural heritage (SA Objective 5), as development is likely to result in a significant impact on the setting of a Grade I, Grade II* and various Grade II LBs. Furthermore, the development will have potential to significantly impact the features and settings of two RPGs, coinciding partially in the north with 'Baddesley Clinton Hall', and is expected to impact the setting of an SM located 65m from the settlement. The proposed development at New Settlement C1 is more likely to lead to unavoidable adverse impacts on the historic environment within the SWLP area.

C.6.9 Mitigation

- C.6.9.1 Avoidance of impacts on heritage assets could be achieved through layout and design of future development proposals. It is expected that in many cases impacts on the setting or features of heritage assets could also be avoided or significant harm reduced through separating development from heritage assets using areas that will be safeguarded for GI or open space. In addition, historic distinctiveness can be maintained by using high-quality, local materials for development whilst incorporating any architectural significance. GI and green buffers should also be integrated into new development, particularly where current open spaces or undeveloped areas are integral to the setting of heritage assets or offer important viewing opportunities of historic landmarks. The layout and design of new developments should also work to ensure heritage assets are respected and enhanced, to ensure the significance and value of the historic environment in SWLP area preserved.

- C.6.9.2 Where designated or locally important historic buildings fall within the developable areas, appropriate use of materials and methods can be used to repair and maintain the historic asset, using Historic England’s Technical Guidance and Research³³. Furthermore, following guidance from Historic England³⁴, development should seek opportunities to enhance historic assets through improved energy efficiency, maintenance and repair to contribute to a greener future and adapt to climate change.
- C.6.9.3 To align with the National Planning Policy Framework (NPPF)³⁵ plan makers should ensure that the significance of any heritage asset which will potentially be impacted by development is described, which can help to understand what features are important and what contributes to the setting of the heritage asset.
- C.6.9.4 Development at all 12 new settlements should be informed by archaeological surveys. Archaeological remains, both seen and unseen, have the potential to be affected by new development. Archaeological features and information boards within new developments can also help to educate residents in regard to the historic environment and build a greater appreciation of local heritage.

³³ Historic England (2024). Technical Guidance and Research. Available at: <https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf/> [Date accessed: 31/10/24]

³⁴ Historic England (2024). Adapting Historic Buildings for Energy and Carbon Efficiency. Available at: <https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/> [Date accessed: 31/10/24]

³⁵ DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99f07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 23/10/24]

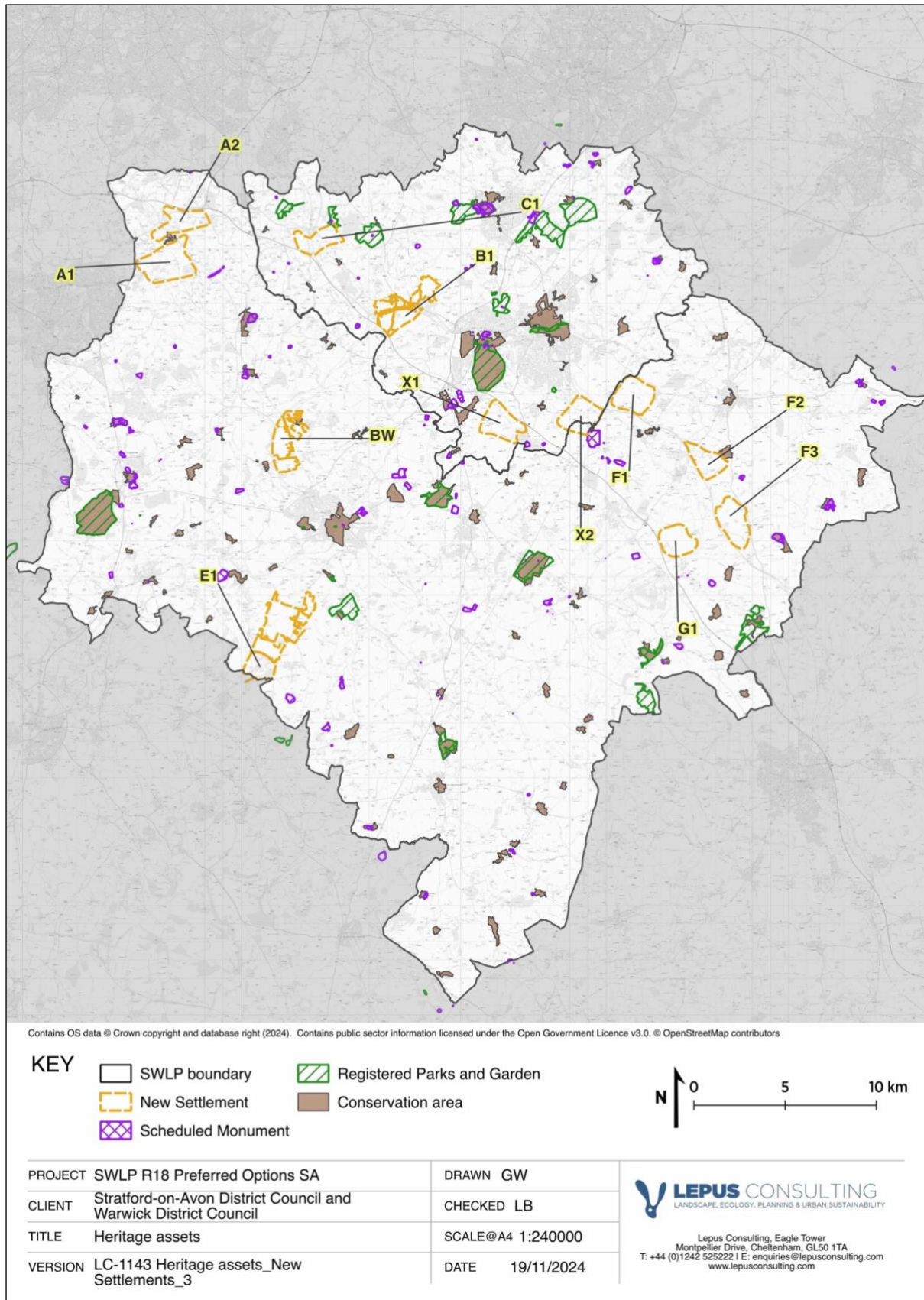


Figure C.6.1: Scheduled Monuments, Registered Parks and Gardens and Conservation Areas within the SWLP area

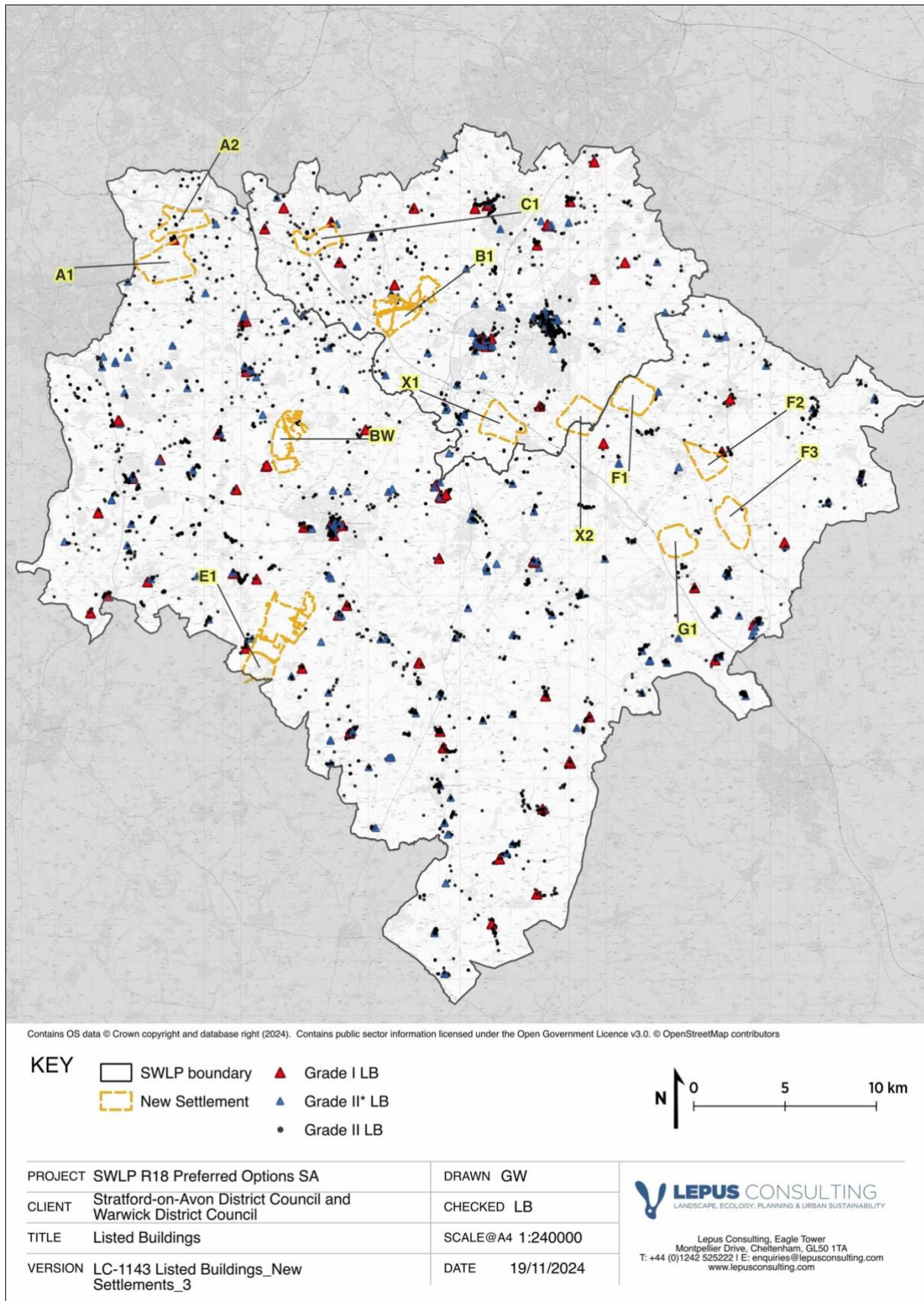


Figure C.6.2: Listed Buildings within the SWLP area

C.7 SA Objective 6: Pollution

C.7.1 Overview

C.7.1.1 Poor air quality is among the largest environmental risks to public health in the UK. A number of objectives have been established in relation to air quality at both the European and the UK level (emanating from the 1996 EC Directive³²). This includes the setting of targets for reducing emissions of specific pollutants to minimise negative impacts on health and the environment. The SWLP area includes five Air Quality Management Areas (AQMAs) declared due to an exceedance on the nitrogen dioxide (NO₂) annual average air quality objective. Air pollution, particularly excessive nitrogen deposition, is known to be harmful to human health and the functioning of natural habitats.

C.7.1.2 The impact matrix of all 12 new settlements and the ranking against pollution (SA Objective 6) is presented within **Table C.7.1**.

C.7.2 Air Quality Management Areas

C.7.2.1 There are four designated AQMAs within SWLP area which includes 'Studley AQMA', 'Stratford-on-Avon District Council (No 1) 2010 AQMA', 'Leamington Spa AQMA' and 'Warwick AQMA (Amended 2008)'. All 12 of the new settlements are located over 200m from an AQMA, and a negligible impact is identified for all 12 of new settlements in terms of exposure of residents to poor air quality, and exacerbation of existing air quality issues within AQMAs.

C.7.3 Main roads

C.7.3.1 The SWLP area is predominantly rural, with a few A-roads linking the main settlements and the M40/M42 providing access to the national strategic road network (see **Figure C.7.1**). Ten of the new settlements (A1, A2, B1, BW, C1, F1, F2, F3, G1 and X2) are located within 200m of a main road, including New Settlement A2 that is located within 200m of the M42 and New Settlements C1 and G1 that are located within 200m of the M40. The development at these new settlements could potentially expose some residents to higher levels of transport-associated noise and air pollution. A minor negative impact is identified on air pollution for ten of the new settlements.

C.7.3.2 New Settlements E1 and X2 is located beyond 200m of a main road, where a negligible impact on exposure to existing sources of air pollution is identified.

C.7.4 Railway line

C.7.4.1 There are several main line railway stations in the SWLP area (see **Figure C.7.1**). These railway stations provide rail links across the country including to Coventry, Birmingham, London Marylebone, Plymouth, Cardiff Central, Nottingham and Glasgow Central.

C.7.4.2 Eleven New Settlements (A1, A2, B1, BW, C1, E1, F1, F2, F3, G1 and X2) are located within 200m of a railway line and could potentially locate some residents in areas with higher levels of noise pollution and vibrations associated with rail transport. Railway lines pass though the centre of New Settlements A1, B1, C1 and E1 and adjacent to New Settlements A2, BW, F1, F2, F3, G1 and X2. A minor negative impact is identified for the 11 new settlements.

C.7.4.3 New Settlement X1 is located beyond 200m of a railway line, where a negligible effect on noise pollution and vibrations will be likely.

C.7.5 Groundwater source protection zones

C.7.5.1 Designed to protect individual groundwater sources, source protection zones (SPZ) show the risk of contamination from any activities that might cause pollution in the area. SPZs are located in the central and north SWLP area, predominantly SPZ 3, with smaller areas of SPZ 1 and SPZ 2.

C.7.5.2 None of the 12 new settlements are located within a SPZ and therefore development is not expected to contribute to pollution of groundwater sources. A negligible impact on groundwater pollution is identified for the 12 new settlements, although development may still contribute towards increased runoff and cumulative adverse effects to some extent.

C.7.6 Watercourses

C.7.6.1 A network of waterways course through the SWLP area, associated with rivers such as the River Avon and River Dene (see **Figure C.7.2**). Development in close proximity to watercourses is more likely to result in pollution and impact upon the bed and banks of watercourses and reduce water quality. Ten of the new settlements (A1, A2, B1, BW, C1, E1, F1, F2, F3 and X2) coincide with a watercourse or are located within 200m of a watercourse and development at the new settlement will have potential to impact water quality. For example, New Settlement A1 coincides with a tributary of the River Alne which flows through the centre of the new settlement and New Settlements F2 and F3 coincide with the River Itchen that flows through the west of both the settlements. New Settlement F1 is adjacent to an unnamed watercourse to the south of the settlement boundary and New Settlement A2 is located within 200m of 'Spring Brook' to the north and an unnamed watercourse to the east. A minor negative impact on water quality is identified at these seven new settlements.

C.7.6.2 New Settlements G1 and X1 are located over 200m from a watercourse and will be less likely to impact water quality as a result of the proposed development. A negligible impact is identified on water quality for these two new settlements, although development may still contribute towards increased runoff and cumulative adverse effects to some extent. Each development site would need to be evaluated according to land use type, size of development and exact location.

Table C.7.1: Impact matrix of new settlements for pollution – SA Objective 6

New Settlement	AQMA	Main road	Railway line	Groundwater SPZ	Watercourses	SA6 ranking
A1	0	-	-	0	-	11 th
A2	0	-	-	0	-	9 th
B1	0	-	-	0	-	10 th
BW	0	-	-	0	-	6 th
C1	0	-	-	0	-	12 th
E1	0	0	-	0	-	3 rd
F1	0	-	-	0	-	5 th
F2	0	-	-	0	-	7 th
F3	0	-	-	0	-	8 th
G1	0	-	-	0	0	2 nd
X1	0	-	0	0	0	1 st
X2	0	0	-	0	-	4 th

C.7.7 Ranking

C.7.7.1 The new settlements have been ranked considering whether they lie in proximity to a main road, railway line and watercourses, as no new settlements are identified to be located within an AQMA or a groundwater SPZ. New settlements that are located closer to watercourses are ranked lower owing to the potential increased runoff of pollutants with implications for water quality.

C.7.7.2 New Settlement X1 has been identified as the **best performing** new settlement against pollution (SA Objective 6), as it is the only new settlement to be located away from the existing railway network and will locate residents away from existing sources of air pollution. Furthermore, New Settlement X1 is located over 200m from watercourses within the SWLP area and will potentially pose a lower risk to water quality as a result of the proposed development.

C.7.7.3 New Settlements E1, G1 and X2 are all located within 200m of a railway, potentially locating residents in close proximity to existing sources of air and noise pollution. However, New Settlements E1 and X2 are located away from a main road and therefore reduce residents' exposure to existing sources of air pollution associated with transport emissions from main roads. New Settlement G1 is located beyond 200m from a watercourse and could potentially perform slightly better overall in comparison to New Settlements E1 and X2 which coincide with a watercourse. The Tach Brook passes through the south of New Settlement X2, where bad ecological status has been identified at the Tach Brook³⁶. The Marchfront Brook partially coincides and is adjacent to New Settlement E1, where moderate ecological status has been identified at the Marchfront Brook³⁷. Development proposed at New Settlement X2 could potentially result in greater adverse effects and exacerbation of existing poor water quality than New Settlement E1.

³⁶ Environment Agency (2022). Catchment data explorer. Avon Rural Rivers and lakes. Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109054043740> [Date accessed: 23/10/24]

³⁷ Environment Agency (2022). Catchment data explorer. Avon Rural Rivers and lakes. Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109054039490> [Date accessed: 12/11/24]

- C.7.7.4 There is little to separate New Settlements BW, F1, F2 and F3 in ranking in terms of the potential exposure and generation of pollution. All four new settlements are located within 200m of a main road and adjacent to a railway, and all lie in proximity to watercourses. New Settlements BW and F1 are adjacent to a watercourse, whereas watercourses pass through New Settlements F2 and F3; therefore, there is potentially less risk of pollution impacts on watercourses at BW and F1. New Settlement F1 may perform slightly better where the Stratford-on-Avon Canal that is adjacent to New Settlement BW is located along a longer stretch of New Settlement BW than the unnamed watercourse that partially runs adjacent to the south of New Settlement F1. Therefore, greater risk of pollution impacts could be expected at New Settlement BW. The River Itchen, a main river, with moderate ecological status³⁸, passes through the north of New Settlement F2 meaning there may be greater risk of direct pollution impacts compared to the tributaries of the river that pass through the north and southwest of New Settlement F3.
- C.7.7.5 New Settlements A1, A2 and B1 all coincide with a railway, through the southeast corner of A1, south of A2 and centre of B1, all three new settlements also have potential to locate residents in areas of existing poor air quality alongside main roads. New Settlement A2 has potential to perform slightly better than New Settlement B1, where A2 is located within 200m of Spring Brook, which has poor ecological status³⁹ and New Settlement B1 coincides with the Grand Union Canal which has moderate ecological status⁴⁰. Therefore, less risk of direct pollution impacts on watercourses is expected at New Settlement A2 as it does not coincide with a watercourse. New Settlement A1 performs slightly worse than both A2 and B1 in regard to potential adverse effects on water quality, owing to the presence of a main river, the River Alne through the centre of the settlement, which has poor ecological status⁴¹.
- C.7.7.6 New Settlement C1 is identified as the **worst performing** new settlement against pollution (SA Objective 6), given the main road and railway that pass through the settlement area with potential to locate residents in areas of existing sources of air and noise pollution. Furthermore, New Settlement C1 coincides with two watercourses, the Grand Union Canal with moderate ecological status⁴² and the South Stratford Canal which has good ecological status⁴³. There may be greater potential for adverse effects on water quality of these two watercourses, compared to the other new settlement options, where larger sections of the two watercourses pass through the settlement area.

³⁸ Environment Agency (2022). Catchment data explorer. Avon Rural Rivers and lakes. Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109054044070> [Date accessed: 01/11/24]

³⁹ Environment Agency (2022). Catchment data explorer. Tame Lower Rivers and Lakes. Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB104028042501> [Date accessed: 23/10/24]

⁴⁰ Environment Agency (2022). Catchment data explorer. Avon Rural Canals. Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB70910205> [Date accessed: 12/11/24]

⁴¹ Environment Agency (2022). Catchment data explorer. Avon Urban Rivers and lakes. Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109054043830> [Date accessed: 23/10/24]

⁴² Environment Agency (2022). Catchment data explorer. Avon Rural Canals. Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB70910205> [Date accessed: 23/10/24]

⁴³ Environment Agency (2022). Catchment data explorer. Avon Rural Canals. Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB70910206> [Date accessed: 23/10/24]

C.7.8 Mitigation

- C.7.8.1 Impacts of air pollution and noise pollution could be avoided through the layout and design of future development, locating and designing main roads within the new settlement away from proposed residential development. The proposed development should also plan the new settlements to avoid congestion that would prevent pollution hotspots within the new settlement, which could be achieved through liaison with National Highways. Adopting the 20-minute neighbourhoods approach will allow for a permeable public realm that promotes local journeys via walking and cycling and reduces the need for car based travel.
- C.7.8.2 Mitigation through the implementation of green buffers or vegetation retention/planting could help to reduce exposure to sources of poor air quality, and help to filter air pollutants.
- C.7.8.3 Furthermore, through providing electric vehicle (EV) charging points and associated infrastructure to support the uptake in EVs, air quality could be enhanced through reducing emissions of harmful pollutants such as NO₂ and particulate matter. Renewable technologies and increased energy / water efficiency measures could also further mitigate harmful impacts on air and water quality through increasing the sustainable use of resources and minimising emissions.
- C.7.8.4 Mitigation measures to avoid water pollution could be achieved through appropriate management of construction and incorporation of sustainable drainage and GI to reduce impacts during the operation of the development. It is expected that 40% of the new settlement area will be used for GI and therefore impacts on water quality could be avoided through the layout and design of future development proposals. Enhancement to waterbodies can also provide benefits to water quality, which have been discussed within the mitigation of flooding (see **Section C.3.5**)

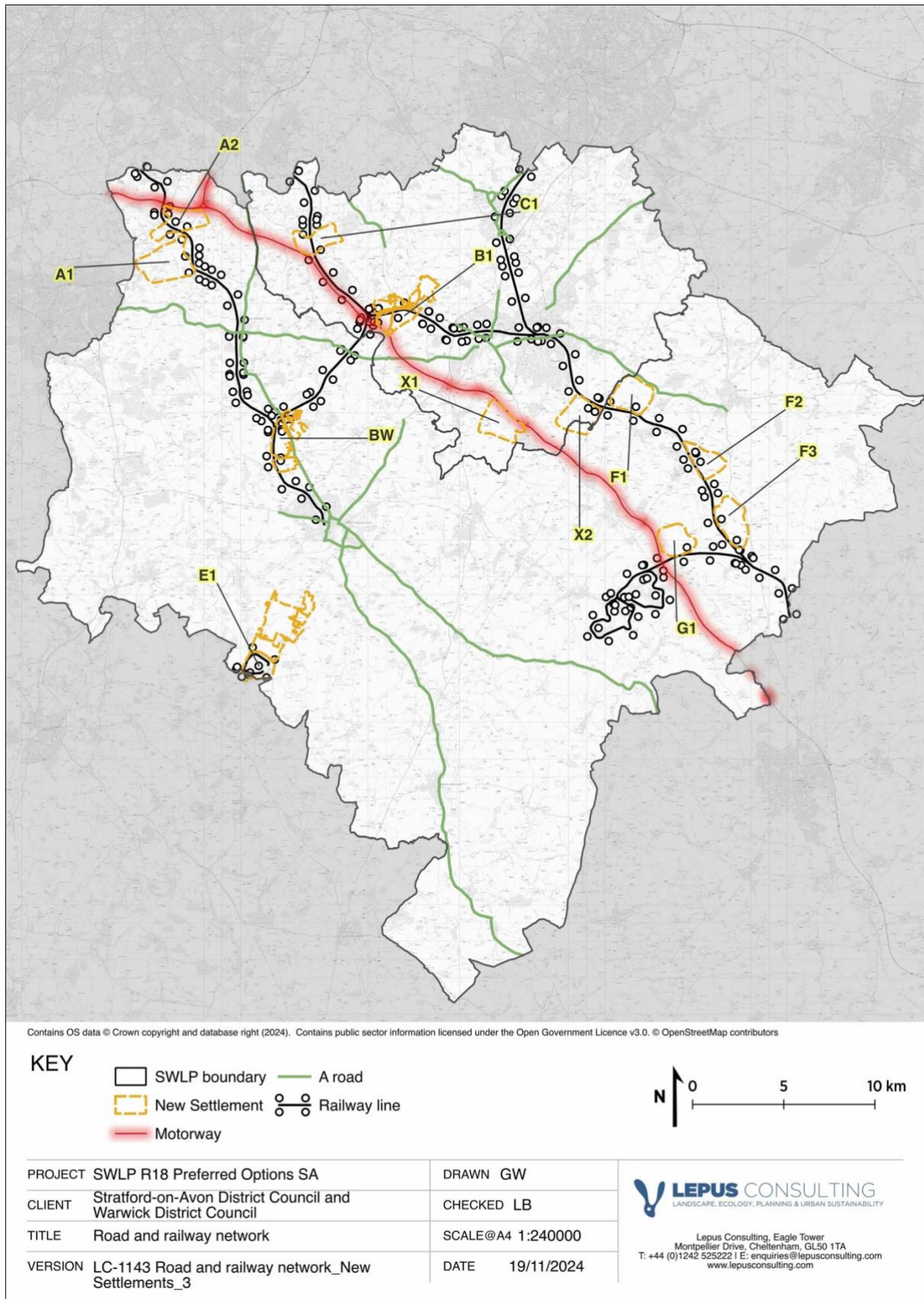


Figure C.7.1: Road and railway network within the SWLP area

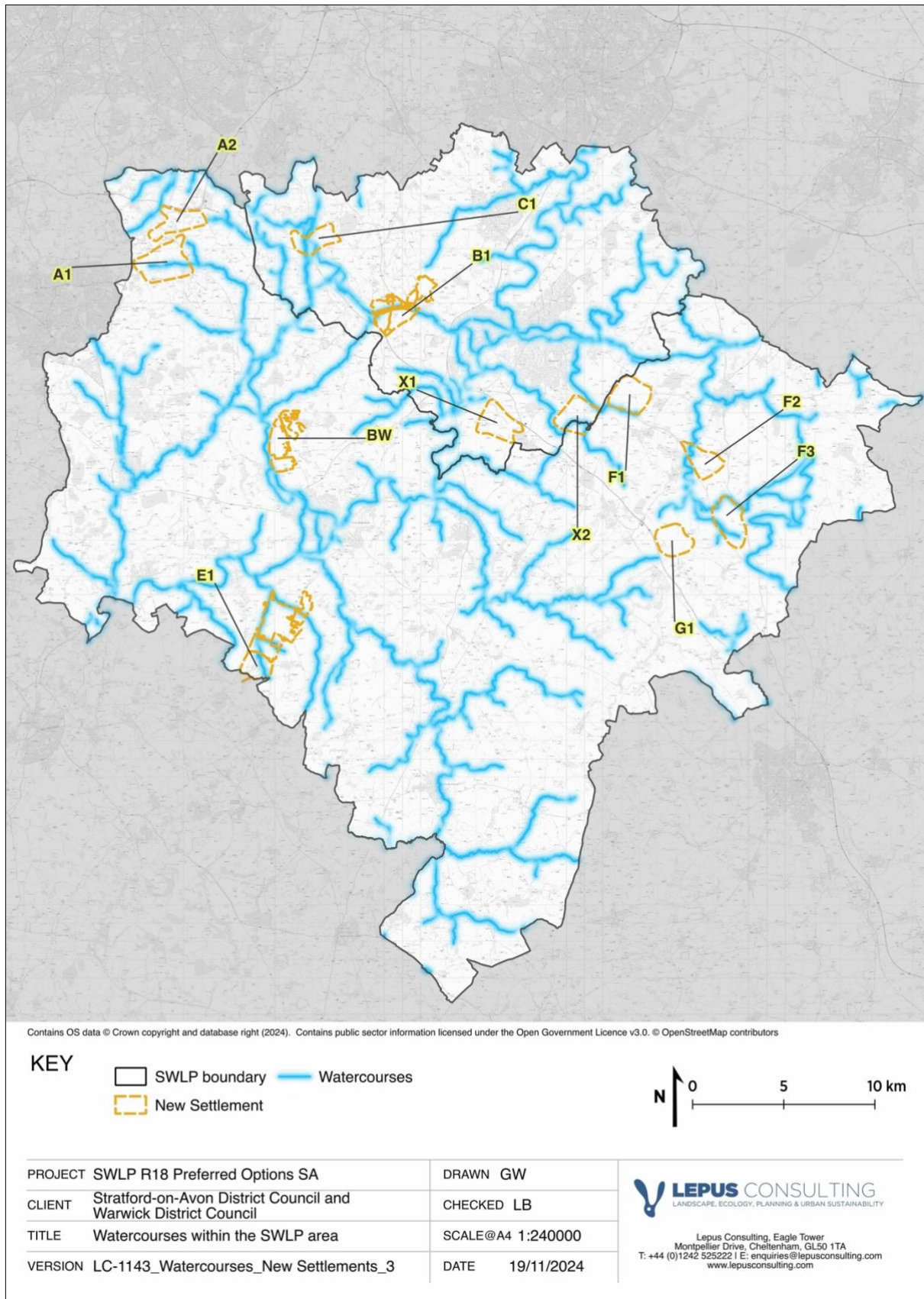


Figure C.7.2: Watercourses within the SLWP area

C.8 SA Objective 7: Natural Resources

C.8.1 Overview

C.8.1.1 Soil is an essential and non-renewable resource that provides a wide range of ecosystem services. It filters air, stores and cycles water and nutrients, decomposes and cycles organic matter, supports plant growth and provides medicines. It is also one of the most important natural carbon sinks available and is vital in efforts to mitigate climate change. It is therefore important for decision makers to make best efforts to preserve soil resources. Development can potentially have adverse impacts on soil stocks, such as by direct loss of soil (e.g. excavating), contamination, increased erosion, breakdown of structure and loss of nutrients.

C.8.1.2 The impact matrix of all 12 new settlements and the ranking against natural resources (SA Objective 7) is presented within **Table C.8.1**.

C.8.2 Agricultural Land Classification (ALC)

C.8.2.1 All 12 of the new settlements are primarily located on undeveloped land, with New Settlement E1, F2, X2 and B1 containing areas of previously developed land. The majority of land in the SWLP area is ALC Grade 3. This could potentially be Grade 3a, which are versatile and productive soils, or Grade 3b, which are less versatile and productive. The majority of Stratford-upon-Avon and the town of Warwick are situated on 'urban' or ALC Grade 4 land, with pockets of Grade 2 ALC land. For the purposes of this assessment, Grades 1, 2 and 3 are identified as potential 'best and most versatile' (BMV) land (see full methodology in **Chapter 2**). Development impacts which could be expected on soils includes the temporary displacement of soils, damage to soil structure during stripping, spread of invasive species as a result of translocation of soils and increased surface-water run-off to name a few⁴⁴.

C.8.2.2 All 12 of the new settlements are located either wholly or predominantly on Grade 3 ALC land. New Settlement X1 also lies partially on Grade 2 land which is likely to be very good quality. New Settlements A2, C1, F1, F2 and G1 also contain some small areas of Grade 4 poor quality land and New Settlement E1 contains areas of Grade Urban ALC land. All 12 of the new settlements contain over 20ha of Grade 3 ALC land, which presents a large-scale loss of BMV soil resources⁴⁵. The development at all 12 new settlements has potential to have a major negative impact on BMV soil and natural resources within the SWLP area.

⁴⁴ IEMA. Institute of Environmental Management and Assessment (IEMA) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment. Available at: <https://assets.publishing.service.gov.uk/media/5b2264ff40f0b634cfb50650/pb13298-code-of-practice-090910.pdf> [Date accessed: 05/11/24]

⁴⁵ Natural England (2021). Guide to assessing development proposals on agricultural land. Available at: <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land> [Date accessed: 31/10/24]

C.8.3 Mineral safeguarding areas

C.8.3.1 Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. Mineral Safeguarding Areas (MSAs) designated by minerals planning authorities cover known deposits of minerals which should be safeguarded from unnecessary sterilisation from non-mineral development. The SWLP area includes large areas of MSAs protecting a range of mineral resources, including⁴⁶:

- Bedrock Sand and Gravel
- Unconsolidated Sand and Gravel
- Brick Clay
- Building Stone
- Cement Raw
- Crushed Rock
- Shallow Coal

C.8.3.2 Of the 12 new settlements, ten New Settlements (A1, A2, B1, BW, C1, F1, F2, F3, X1 and X2) are located within an MSA, including areas of 'Unconsolidated Sand and Gravel', 'Building Stone' and 'Cement Raw'. Development at these ten new settlements has the potential for sterilisation of these mineral resources, meaning that the mineral resources will be inaccessible for potential extraction in the future. Therefore, development at these ten new settlements could potentially have a minor negative impact on the natural resources of the surrounding area.

C.8.3.3 New Settlements E1 and G1 do not coincide with any MSA and will be expected to have a negligible impact on mineral resources.

Table C.8.1: Impact matrix of new settlements for natural resources – SA Objective 7

New Settlement	Agricultural land classification	Mineral safeguarding areas	SA7 ranking
A1	--	-	10 th
A2	--	-	5 th
B1	--	-	9 th
BW	--	-	6 th
C1	--	-	8 th
E1	--	0	1 st
F1	--	-	7 th
F2	--	-	11 th
F3	--	-	3 rd
G1	--	0	2 nd
X1	--	-	4 th
X2	--	-	12 th

⁴⁶ Warwickshire County Council (2024). Minerals Local Plan. Policies map. Available at: www.warwickshire.gov.uk/mineral-waste-plans/minerals-development-framework [Date accessed: 29/10/24]

C.8.4 Ranking

- C.8.4.1 All 12 of the new settlements contain Grade 3 ALC land, and the majority of the new settlements are also located on various areas of Grade 2 ALC land or Grade 4 ALC land. Therefore, the ranking has factored which ALC Grade is located within the settlement boundary, the proportion of potential BMV land and the number of MSAs located within the new settlement boundary.
- C.8.4.2 New Settlement E1 has been identified as the **best performing** new settlement against natural resources (SA Objective 7). New Settlement E1 contains areas of previously developed land to the south of the settlement which will be expected to reduce the impact on the areas undeveloped land and BMV land. Although there is little separating New Settlements E1 and G1, given that both will avoid development within MSAs, New Settlement G1 contains a greater area of potential BMV land (Grade 3 ALC) than New Settlement E1. New Settlement E1 is located on Grade 3 ALC, Grade 4 ALC and Urban ALC, compared to G1 that is located on Grade 3 ALC and Grade 4 ALC land.
- C.8.4.3 There is little separating New Settlements F3 and X1, both of which coincide with one MSA protecting 'Unconsolidated Sand and Gravel'. Both contain some areas of Grade 3 ALC land, however New Settlement X1 is also located on Grade 2 ALC land and will be expected to perform slightly worse against this receptor owing to the potential for loss of higher quality agricultural land.
- C.8.4.4 New Settlements A1, A2, B1, BW, C1 and F1 all coincide with 'Unconsolidated Sand and Gravel' and 'Building Stone' MSAs, where the majority of each settlement area is located within the MSA and therefore little separates these new settlements in regard to ranking. New Settlement A1 and B1 wholly coincides with Grade 3 ALC land and therefore could be expected to result in greater adverse effects associated with loss of BMV land, in comparison to New Settlements A2, BW, C1 and F1 that also contain some areas of lower quality Grade 4 ALC land. New Settlements A1 and B1 have been ranked according to the proportion of MSAs located within the boundary. New Settlements A2, BW, C1 and F1 have been ranked according to the proportion of Grade 3 and Grade 4 ALC land located within the boundary, where areas with less Grade 3 ALC land and greater areas of Grade 4 ALC land will be expected to perform better.
- C.8.4.5 New Settlement X2 is identified as the **worst performing** new settlement against natural resources (SA Objective 7). Little separates New Settlement X2 from F2 in the ranking, where both coincide with three MSAs, including 'Unconsolidated Sand and Gravel', 'Building Stone' and 'Cement Raw'. Both the new settlements coincide with Grade 3 ALC land, however New Settlement F2 includes a proportion of Grade 4 ALC land to the north of the settlement area and will be expected to result in less adverse effects on BMV soil.

C.8.5 Mitigation

- C.8.5.1 It is expected that 40% of all of the new settlement areas will be used for GI and soils could be retained in these areas. Retaining areas of undeveloped land and developing GI networks is essential for ensuring effective surface water drainage and prevent soil erosion, whilst maintaining ecological networks which contribute to soil functions. However, the loss of BMV soil is a long term, permanent impact and mitigation is unlikely to be possible.

- C.8.5.2 Preparing more detailed soil and agricultural land quality surveys can be used to identify the grade of agricultural land in accordance with the ALC criteria as published by Natural England⁴⁷. The soil and agricultural land quality surveys can be carried out as a two-step process, firstly undertaking desk studies of published soil, geological, flood risk and climate information, and secondly undertaking fieldwork to assess the site and soil conditions, usually involving digging soil pits or auger borings. This can be incorporated into an Environmental Impact Assessment (EIA) or a standalone soil assessment. As highlighted in IEMA's 'A New Perspective on Land and Soil in Environmental Impact Assessment' (2022)⁴⁸. Soil surveys help to determine the impact of development on soil health, ecosystem services and natural capital⁴⁹. Furthermore, soil surveys will help to inform site layouts and the retention of higher-grade soils, for community use such as allotments that will help to maintain soil productivity.
- C.8.5.3 Although it is not possible to entirely mitigate the loss of agricultural land to a development, it is possible to mitigate the displacement of soils. Where it is not possible to wholly avoid built development in areas with high-value soils, the collection of soil data should allow the magnitude of potential impacts relating to the site-specific temporary or permanent displacement of soils to be assessed.
- C.8.5.4 It is recommended that good practice guidance is followed regarding soil handling, to ensure that opportunities for on-site and off-site re-use of soils are explored that best maintain soil functions, for example DEFRA's 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' (2009)⁵⁰.
- C.8.5.5 Preparing more detailed soil surveys will help to determine the presence of Grade 3a and 3b ALC land. Grade 3a and 3b are subgrades, defined as good quality agricultural land (3a) and moderate quality agricultural land (3b)⁵¹. Soil surveys help to determine the impact of development on soil health, ecosystem services and natural capital⁵². Furthermore, soil surveys will help to inform site layouts and the retention of higher-grade soils, for community use such as allotments that will help to maintain soil productivity.
- C.8.5.6 As with BMV land, avoidance should be prioritised to prevent the sterilisation of MSAs. However, considering the majority of the new settlements coincide with MSAs, scope for avoidance is minimal.

⁴⁷ Natural England (2021). Guide to assessing development proposals on agricultural land. Available at: <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land> [Date accessed: 31/10/24]

⁴⁸ IEMA (2022). A New Perspective on Land and Soil in Environmental Impact Assessment. Available at: <https://www.iema.net/resources/blogs/2022/02/17/iema-launch-of-new-eia-guidance-on-land-and-soils-february-2022/> [Date accessed: 05/11/24]

⁴⁹ IEMA (2022). A New Perspective on Land and Soil in Environmental Impact Assessment.

⁵⁰ DEFRA (2009). Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Available at: <https://assets.publishing.service.gov.uk/media/5b2264ff40f0b634cfb50650/pb13298-code-of-practice-090910.pdf> [Date accessed: 05/11/24]

⁵¹ Natural England (2021). Guide to assessing development proposals on agricultural land. Available at: <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land> [Date accessed: 31/10/24]

⁵² IEMA (2022). A New Perspective on Land and Soil in Environmental Impact Assessment.

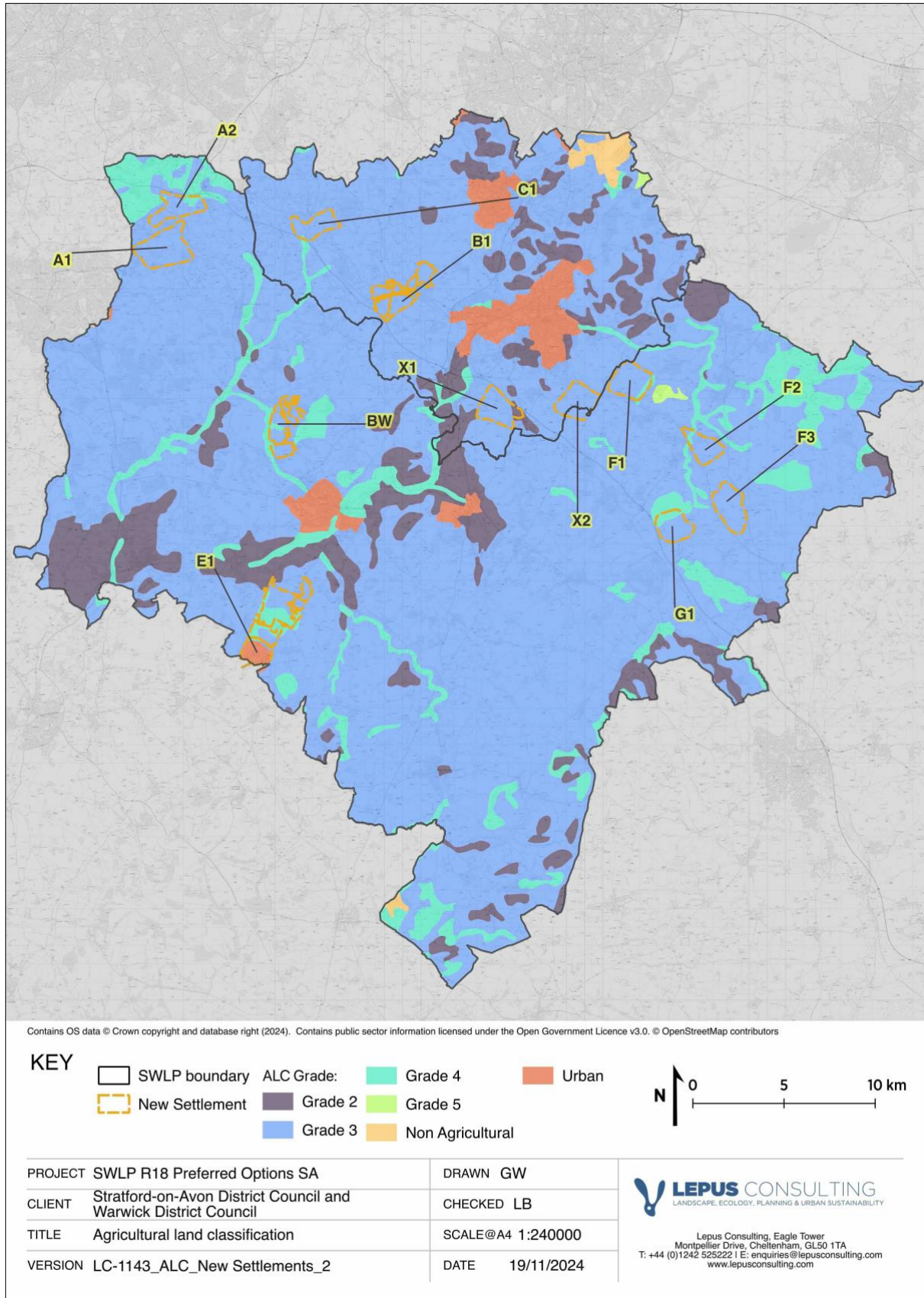


Figure C.8.1: Agricultural Land Classification within the SWLP area

C.9 SA Objective 8: Waste

C.9.1 Overview

- C.9.1.1 The total collected household waste in 2022-2023 for Stratford-on-Avon District was 52,198 tonnes and the total for Warwick District in was 52,736 tonnes, with a combined total of 104,934⁵³. Of this total collected household waste, 60% in Stratford-on-Avon District and 53.4% in Warwick District was sent for reuse or recycling.
- C.9.1.2 The impact matrix of all 12 new settlements for waste (SA Objective 8) is presented within **Table C.9.1**.

C.9.2 Household waste

- C.9.2.1 All 12 of the new settlements propose large scale residential development, all with potential to increase household waste generation by over 1% compared to the current figures for the district in which it is located. New Settlement F2 has the lowest residential capacity at 4,840 dwellings and New Settlement E1 has the highest at 9,850 dwellings. Development at all 12 new settlements will be expected to result in a major negative impact on waste.

Table C.9.1: Impact matrix of new settlements for waste – SA Objective 8

New Settlement	Household waste	SA8 ranking
A1	--	=
A2	--	=
B1	--	=
BW	--	=
C1	--	=
E1	--	=
F1	--	=
F2	--	=
F3	--	=
G1	--	=
X1	--	=
X2	--	=

⁵³ DEFRA (2023). Local authority collected waste generation from annual results 2021/22 (England and regions) and local authority data annual results 2021/22. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date accessed: 01/11/24]

C.9.3 Ranking

- C.9.3.1 All 12 new settlements are expected to result in a major negative impact on waste, where the proposed development has potential to significantly increase the production of household waste in the SWLP area. A thorough ranking exercise has not been possible, where the assessment is based on limited data solely relating to their housing capacities. The indicative capacity of each new settlement would be the only information available to inform the ranking, potentially introducing bias by assuming waste generation will increase proportionally with the number of new homes. The location of new settlements in relation to waste facilities and provision of suitable facilities for waste disposal within each new settlement is unknown.
- C.9.3.2 When all 12 new settlements are compared using indicative capacities alone, the best performing new settlement will propose the lowest number of dwellings, which is New Settlement F2, and the worst performing new settlement will propose the highest number of dwellings, which is New Settlement E1.

C.9.4 Mitigation

- C.9.4.1 The high housing capacities attributed to the new settlements limit the potential for waste generation to be effectively reduced. However, the Warwickshire Waste Plan⁵⁴ has outlined mechanisms for managing and reducing waste in the county, which is primarily associated with behavioural solutions. These include previous targets to reuse, recycle or compost at least 50% household waste by 2020, such as through diverting municipal waste from landfill for recycling, composting or energy recovery purposes. Through providing suitable facilities for waste disposal, the SWLP can encourage residents and businesses to engage with behaviours that seek to minimise waste production.
- C.9.4.2 Industrial and commercial waste can also be reduced to some extent. Life-cycle assessments can be engaged with by developers to minimise waste production from the construction, occupancy, and the potential future demolition of development. To improve effectiveness, policies relating to waste should be accompanied by metrics which will enable the transparent measurement, and subsequently the management and reduction, of waste in the SWLP area.
- C.9.4.3 At the point which development associated with the new settlement comes to materialise, consideration should be given to the waste associated with construction. It should be ensured that the efficient use of materials is maximised to prevent unnecessary waste, as well as reducing the waste which may occur if/when developments reach the end of their life.
- C.9.4.4 Development at the new settlements provides an opportunity to provide waste facilities such as recycling points at accessible locations. Ensuring residents have easy means through which they can effectively and sustainably dispose of and manage household waste will encourage wider behavioural changes among communities. This supports the mitigation of waste in the SWLP area through reducing the amount of waste sent to landfill and supports a circular economy.

⁵⁴ Warwickshire County Council (2013) Warwickshire Waste Core Strategy. Available at: <https://api.warwickshire.gov.uk/documents/WCCC-680-279>. [Date accessed: 23/10/24]

C.10 SA Objective 9: Housing

C.10.1 Overview

- C.10.1.1 The provision of high-quality affordable housing, alongside appropriate facilities, is important to the creation of sustainable communities in relation to health and wellbeing impacts and promoting equality. Lack of affordable accommodation can lead to those people in lower skilled jobs living further from their places of employment and therefore lead to greater levels of commuting and travel. Lack of appropriate homes to meet the needs of the population, such as accommodation for less mobile people and the elderly, can lead to increased pressure on healthcare facilities.
- C.10.1.2 At this stage of plan-making, it is assumed that all residential-led development options will help provide affordable, high-quality housing that meets the range of accommodation needs identified for the community, including affordable, student and specialist housing as well as opportunities for self and custom build housing.
- C.10.1.3 The impact matrix of all 12 new settlements and the ranking against housing (SA Objective 9) is presented within **Table C.10.1**.

C.10.2 Housing provision

- C.10.2.1 All 12 of the new settlements will be expected to have a major positive impact on local housing provision, where the lowest number of dwellings proposed at New Settlement F2 is 4,840 dwellings.

Table C.10.1: Impact matrix of new settlements for housing – SA Objective 9

New Settlement	Housing provision	SA9 ranking
A1	++	=
A2	++	=
B1	++	=
BW	++	=
C1	++	=
E1	++	=
F1	++	=
F2	++	=
F3	++	=
G1	++	=
X1	++	=
X2	++	=

C.10.3 Ranking

- C.10.3.1 All 12 new settlements are expected to result in a major positive impact on housing provision, where the proposed development will be expected to significantly contribute to housing provision within the SWLP area.

C.10.3.2 However, this assessment is limited by the data available, such as a lack of information regarding the extent of affordable, accessible or range of different sized homes to be provided within each new settlement. Subsequently, the new settlements have not been fully ranked for housing, to avoid introducing bias which may assume that a greater number of houses directly correlates with providing homes to suit a wider range of needs.

C.10.3.3 Based on the limited information available, when all 12 new settlements are compared, the best performing new settlement using indicative capacity alone is New Settlement E1 and the worst performing new settlement using indicative capacity alone is New Settlement F2.

C.10.4 Mitigation

C.10.4.1 No negative impacts have been identified in relation to housing, however developers need to ensure these numbers reflect a range housing types to cater for the varied needs of residents, as well as providing high quality and appropriately sized homes. This includes provision for affordable housing, supported living, single and multiple occupancy homes which cater for accessibility requirements, and land for Gypsy and Traveller use, ultimately ensuring the widest possible range of benefits for different community members.

C.10.4.2 High quality placemaking will be especially important when creating wholly new settlements. Developers must ensure that any proposed development has been designed to align with the Warwickshire Design Guide⁵⁵ and any emerging design codes as highlighted in Draft Policy Direction 26 (see **Appendix E**).

⁵⁵ Warwickshire County Council (2024) Warwickshire Design Guide. Available at:
<https://www.warwickshire.gov.uk/warwickshiredesignguide> [Date accessed: 07/11/24]

C.11 SA Objective 10: Health

C.11.1 Overview

- C.11.1.1 It is important that residents have access to healthcare facilities, including GP surgeries and NHS hospitals. Ideally, residents should be within an approximate ten-minute walking distance to their nearest GP surgery, whilst a hospital providing emergency healthcare within 5km will be considered a sustainable distance.
- C.11.1.2 Good access to greenspace/recreational areas is also beneficial to the physical and mental health and wellbeing of residents, which can facilitate an active lifestyle. The extensive PRow network throughout Warwickshire and the nearby Cotswolds National Landscape offers residents access into the countryside, which provides an open and rural landscape of natural habitats. Given the rural character of much of Stratford-on-Avon District, residents are likely to have good pedestrian access to the surrounding countryside and a good range of natural habitats, although the extent of publicly accessible countryside varies by location.
- C.11.1.3 It is acknowledged that new healthcare facilities could be provided alongside the development of a new settlement. However, it is more likely that existing healthcare facilities can be expanded to cater for the new settlement, rather than the development of a new healthcare facility.
- C.11.1.4 The impact matrix of all 12 new settlements and the ranking against health (SA Objective 10) is presented within **Table C.11.1**.

C.11.2 NHS hospital with A&E department

- C.11.2.1 There is one hospital with an Accident and Emergency (A&E) department in the SWLP area: Warwick Hospital. There are additional hospitals located near the SWLP boundary which are expected to be used by South Warwickshire residents. These include Alexandra Hospital in Redditch, which is located approximately 400m west of the SWLP area, Horton General Hospital which is located in Banbury, approximately 5.6km east of the SWLP area, and the University Hospital Coventry & Warwickshire which is located in Coventry, approximately 4.5km north of the SWLP area.
- C.11.2.2 The majority of New Settlement B1 is located within sustainable distance to Warwick Hospital, located 3.3km west of the hospital. New Settlement X1 is partially located within the sustainable distance to Warwick Hospital, located 5km south. Development at these locations could provide good access to emergency healthcare. A major positive impact on access to emergency healthcare is identified for New Settlement B1 and a minor positive impact is identified for New Settlement X1.
- C.11.2.3 The remaining eight new settlements (A1, A2, BW, C1, E1, F1, F2, F3, G1 and X2) are located outside of the sustainable distance to an NHS Hospital with A&E services. A minor negative impact on access to emergency healthcare is identified across these eight new settlements.

C.11.3 GP Surgeries

- C.11.3.1 There are 41 GP surgeries currently located across the Plan area. The majority of these are located in Warwick and Royal Leamington Spa.

C.11.3.2 Two of the new settlements are partially located within the sustainable distance of 800m to an existing GP surgery. New Settlement A2 is partially located within a sustainable distance to Tanworth-in-Arden Medical Centre to the north and west of the settlement area. New Settlement C1 is partially located within sustainable distance to Lapworth Surgery to the north of the settlement area. The development at the two new settlements is expected to provide some residents with sustainable access to a GP surgery and therefore a minor positive impact is identified.

C.11.3.3 The remaining ten new settlements (A1, B1, BW, E1, F1, F2, F3, G1, X1 and X2) are located outside sustainable distance to existing GP surgeries. A minor negative impact is identified for access to GP surgeries at the ten new settlements.

C.11.4 Leisure facilities

C.11.4.1 There are a total of 11 leisure facilities located across the Plan area. These are sparsely located throughout the SWLP area and include 'Leisure Centre, St Nicholas Park', 'Shipston Leisure Centre' and 'Southam Leisure Centre and swimming pool' to name a few. Meon Vale Leisure Centre is located within the indicative boundary of New Settlement E1 and, assuming the leisure centre is retained within the proposed development, will locate residents within sustainable access to leisure facilities. A minor positive impact on health is identified for New Settlement E1.

C.11.4.2 The remaining 11 new settlements are located outside sustainable distance to a leisure facility. A minor negative impact on health is identified for these new settlements.

C.11.5 Greenspace

C.11.5.1 There are a wide variety of public green spaces across the SWLP area, including parks, playing fields, allotments and sports facilities.

C.11.5.2 Nine new settlements (A1, A2, B1, BW, C1, E1, F1, F2 and G1) are located within sustainable distance to existing public greenspaces. The majority of New Settlement C1 is located within sustainable distance to greenspace situated around the north, south and eastern boundaries of the settlement area. A major positive impact on health will be expected as the majority of the area is within sustainable distance to greenspace. Whereas New Settlements A1, A2, B1, BW, E1, F1, F2 and G1 are located only partially within the sustainable distance to greenspaces. For example, New Settlement A1 is located within sustainable distance partially to the north of the settlement area and New Settlement F1 is located within sustainable distance partially within the east of the settlement area. Minor positive impacts on health will be expected at these five settlements (A1, A2, B1, BW, E1, F1, F2 and G1).

C.11.5.3 The remaining three new settlements (F3, X1 and X2) are entirely located outside sustainable distance to existing public greenspace and will therefore be expected to have a minor negative impact on health.

C.11.6 PRow and cycle network

C.11.6.1 An extensive network of PRow covers the SWLP area, including footpaths and a small proportion of bridleways, byways and unclassified roads. As a result of the extensive network of PRow within the Plan area, it is expected the development proposed at all 12 new settlements will locate residents within a sustainable distance to the PRow network. Furthermore, five of the new settlements, B1, BW, E1, F2 and G1 additionally benefit from being located within sustainable distance to the existing cycle network, providing opportunities for recreation and active travel. All 12 new settlements will be expected to have a minor positive impact on health and wellbeing.

Table C.11.1: Impact matrix of new settlements for health – SA Objective 10

New Settlement	NHS Hospital	GP Surgery	Leisure facilities	Greenspace	PRow and cycle network	SA10 ranking
A1	-	-	-	+	+	6 th
A2	-	+	-	+	+	4 th
B1	++	-	-	+	+	1 st
BW	-	-	-	+	+	8 th
C1	-	+	-	++	+	3 rd
E1	-	-	+	+	+	5 th
F1	-	-	-	+	+	7 th
F2	-	-	-	+	+	9 th
F3	-	-	-	-	+	12 th
G1	-	-	-	+	+	10 th
X1	+	-	-	-	+	2 nd
X2	-	-	-	-	+	11 th

C.11.7 Ranking

C.11.7.1 Within the rankings, the greatest weighting has been given to proximity to NHS hospitals and GP surgeries as these may be considered more essential, whilst access to wellbeing services such as greenspace has been given a lower weighting as it is more likely these features can be provided alongside new development. All 12 new settlements have good access to the existing PRow network and therefore the receptor has not been considered in the rankings. The assessments are based on existing infrastructure provision and do not factor in capacity or new healthcare facilities that could be provided alongside development.

C.11.7.2 New Settlement B1 is identified as the **best performing** new settlement. New Settlements B1 and X1 are the only new settlements that lie within the sustainable target distance to an NHS Hospital with A&E services, at Warwick Hospital. New Settlement X1 is located further from Warwick Hospital than New Settlement B1 and will not locate residents within sustainable distance to existing public greenspace.

C.11.7.3 New Settlement C1 is partially located within sustainable distance to Lapworth Surgery and will be expected to provide residents with good access to healthcare. New Settlement C1 will also locate residents in areas with sustainable access to a range of existing public greenspace, with benefits to physical and mental health and wellbeing. New Settlement A2 is also partially located within sustainable distance to Tanworth-in-Arden Medical Centre and will be expected to provide residents with good access to healthcare. New Settlement A2 will only partially locate residents within sustainable distance to existing public greenspace and has therefore been ranked lower than New Settlement C1.

- C.11.7.4 New Settlement E1 is the only new settlement to provide residents with access to existing leisure facilities, where Meon Vale Leisure Centre is located within the settlement boundary of New Settlement E1.
- C.11.7.5 New Settlements A1, BW, F1, F2 and G1 perform similarly, as are all located beyond sustainable distance to an NHS Hospital with A&E services and existing GP surgeries, and all are partially located within sustainable distance to public greenspace. To separate the four new settlements in ranking, the new settlement's proximity to the nearest NHS Hospital with A&E services has been used. The nearest hospital to the four new settlements is Alexandra Hospital located 5.2km from New Settlement A1 and Warwick Hospital located approximately 7.9km from F1, 11km from BW, 12.5km from F2 and 14.7km from G1.
- C.11.7.6 New Settlements F3 and X2 are located beyond sustainable distance to an NHS Hospital with A&E services, existing GP surgeries and the majority of the settlement areas have poor access to existing public greenspace; it is therefore difficult to separate the two new settlements in terms of rank. The nearest GP surgery to both new settlements is approximately 1.2km away and therefore distance to the nearest NHS Hospital has been used to differentiate between the two new settlements. New Settlement X2 is located approximately 6km from Warwick Hospital and New Settlement F3 is located approximately 14km from Horton General Hospital located outside the SWLP area. New Settlement F3 is identified as the **worst performing** new settlement.

C.11.8 Mitigation

- C.11.8.1 Access to healthcare and increased pressures on current healthcare services will be largely mitigated through new infrastructure provision, including healthcare facilities such as GP surgeries, which are expected to be provided alongside development of a new settlement. Furthermore, designing new settlements to be well-planned neighbourhoods that support the 20-minute neighbourhood concept will improve mental and physical wellbeing and will be expected to improve access to local services⁵⁶.
- C.11.8.2 Limited access to greenspace will be expected to be mitigated through the provision of 40% GI at the new settlements. The GI provided could include various natural and semi-natural greenspace, play areas and recreational open space for sport and activities. In addition to providing open space to residents, GI will also improve air filtration and other ecosystem services to support improvements to air quality. Mitigation measures in relation to air quality has been discussed within pollution (see **Section C.7.8**). Other initiatives, such as the implementation of BNG, also have potential to contribute to the physical and mental health benefits of access to greenspaces and nature.

⁵⁶ TCPA (2021). 20-minute Neighbourhoods. Creating Healthier, Active, Prosperous Communities an Introduction for Council Planners in England. Available at: https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf [Date accessed: 01/11/24]

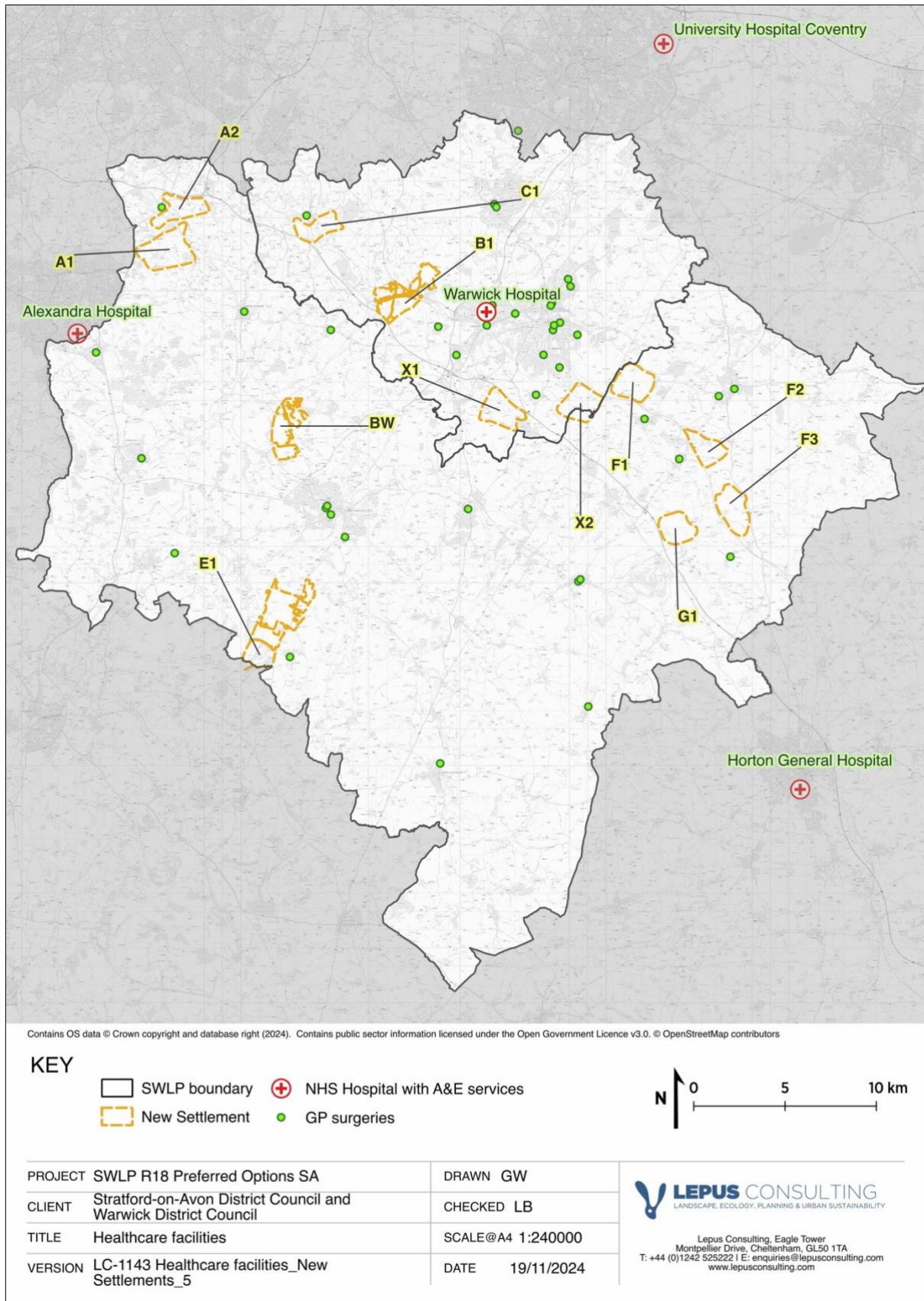


Figure C.11.1: Healthcare facilities within and around the SWLP area

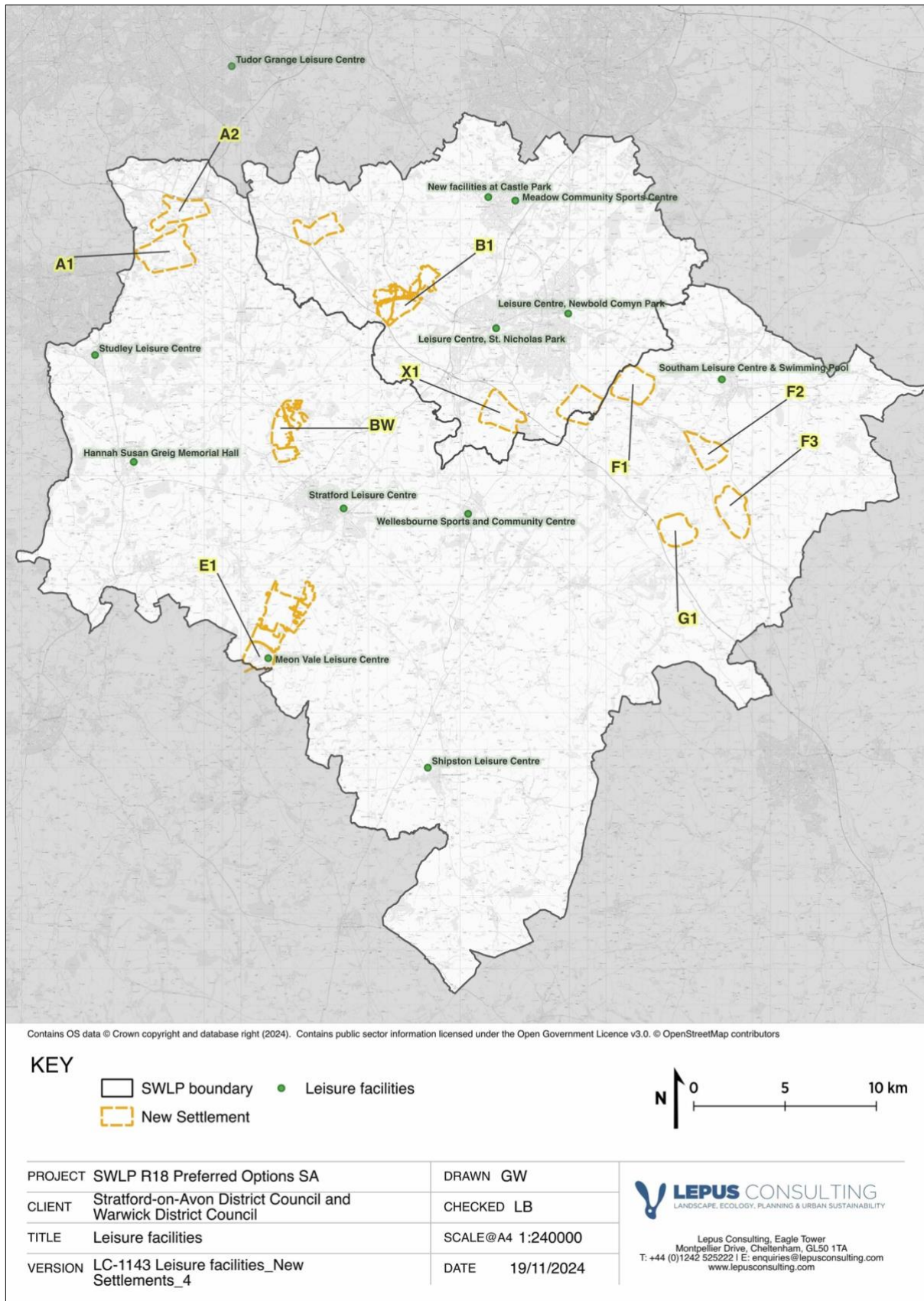


Figure C.11.2: Leisure facilities within the SWLP area

C.12 SA Objective 11: Accessibility

C.12.1 Overview

- C.12.1.1 The SWLP area is well served by a range of public transport including a railway network that provides rail links across the country including to Coventry, Birmingham, London Marylebone, Plymouth, Cardiff Central, Nottingham and Glasgow Central. Additionally, bus services are located throughout the Plan area providing multiple services a day to destinations such as Coventry. However, rural areas have more limited access to bus services and the railway network, and therefore, are likely to have a higher reliance on private car use.
- C.12.1.2 It is acknowledged that new bus stops or bus routes and supporting transport infrastructure could be provided alongside the development of a new settlement. However, the specifics of such infrastructure are not yet defined, and it may be more viable that existing services will be expanded to cater for the new settlement than wholly new services being provided in all circumstances.
- C.12.1.3 The impact matrix of all 12 new settlements and the ranking against accessibility (SA Objective 11) is presented within **Table C.12.1**.

C.12.2 Bus stop

- C.12.2.1 All 12 of the new settlements are located beyond the sustainable distance of 400m to existing bus stops and will be expected to have a minor negative impact on residents' access to bus services. Nine of the new settlements (A1, A2, BW, C1, E1, F1, F2, X1 and X2) are partially located within sustainable distances to bus stops, however a large proportion of residents will be located beyond the recommended walking distance to existing bus services. For example, New Settlement A1 is located approximately 180m from a bus stop on Danzey Green Lane and is within sustainable distance to two bus stops located within Tanworth-in-Arden, however this only covers small areas in the north and east of the settlement area.

C.12.3 Railway station

- C.12.3.1 Five new settlements (A1, A2, B1, BW, and C1) are located within a sustainable distance of 2km to a railway station. The majority of New Settlement A1 is located within sustainable distance to Danzey Station located to the east of the settlement area. The majority of New Settlement A2 is located within sustainable distance to Wood End Station located to the north of the settlement area. The majority of New Settlement BW is located within sustainable distance to Wilmcote Station to the north and Bearley Station to the south. The majority of New Settlement C1 is located within sustainable distance to Lapworth Station located to the north of the new settlement. A major positive impact on residents' access to the railway network is identified for these three new settlements. New Settlement B1 is only partially located within sustainable distance to Hatton Station, located to the south. A minor positive impact on residents' access to the railway network is identified for the new settlement.
- C.12.3.2 The remaining seven new settlements (E1, F1, F2, F3, G1, X1 and X2) are all located wholly outside the sustainable distance of 2km to a railway station and will be expected to have a minor negative impact on residents' access to the railway network.

C.12.4 Access to Food Stores

- C.12.4.1 Local shops are distributed across the SWLP area, highly concentrated within the towns of Stratford-upon-Avon and Warwick, however, rural areas of the Plan area have more limited access to local shops.
- C.12.4.2 New Settlement C1 is partially located within sustainable distance to the village shop in Kingswood, located 320m north of the settlement. New Settlement C1 is likely to provide a minor positive impact on access to food stores.
- C.12.4.3 The remaining 11 new settlements (A1, A2, B1, BW, E1, F1, F2, F3, G1, X1 and X2) are located outside of a sustainable distance to existing local shops and are therefore expected to result in a minor negative impact on access to food stores.

C.12.5 Connectivity

- C.12.5.1 Connectivity has been assessed against the 'South Warwickshire Settlement Analysis'⁵⁷ which measures the presence of active travel and existing road network links surrounding settlement boundaries, and any barriers to movement, in relation to the locations. Connectivity has been ranked on a scale of A-E, with Grade A representing excellent connectivity, and Grade E representing very poor connectivity.
- C.12.5.2 New Settlements B1 and BW are located in areas with poor connectivity (Grade D). New Settlement B1 is located in areas where it is difficult to link to the existing road network and New Settlement BW is located in areas where there are limited footpaths, providing poor connectivity. The proposed development at New Settlement B1 and BW has therefore been identified as having a minor negative impact on connectivity.
- C.12.5.3 Large proportions of the south of New Settlement C1 are located within areas of moderate connectivity (Grade C) and a small proportion of the settlement is located within areas of very poor connectivity (Grade E). Active travel links to the new settlement include potential links along the canal towpath and a bridleway. However, a small proportion is located in an area with no current road access. Overall, development at New Settlement C1 is expected to have a negligible impact on connectivity.
- C.12.5.4 The remaining nine new settlements (A1, A2, E1, F1, F2, F3, G1, X1 and X2) are not located within any areas that have been assessed within the South Warwickshire Settlement Analysis, given their distance from existing settlements, and the impact on connectivity is currently unknown. Therefore, an uncertain impact has been identified for these eight new settlements on connectivity.

C.12.6 Priority Areas

- C.12.6.1 Priority areas have been identified within South Warwickshire to determine which areas are best located in terms of sustainable transport links and economic growth. Priority areas have been categorised on a scale of 1-3, with Priority Area 1 being those with the strongest access links, and Priority Area 3 being those with moderate access links.

⁵⁷ South Warwickshire Councils (2022) 'South Warwickshire Settlement Analysis'.

- C.12.6.2 At least 50% of New Settlement E1 lies within Priority Areas 1 and 2, and less than 30% of the settlement lies outside of all priority areas. A minor positive impact has been identified for New Settlement E1 on accessibility.
- C.12.6.3 Five new settlements (A1, A2, F2, F3 and G1) are located where over 50% of the new settlement is not located within any priority area, based on current infrastructure. All five of these new settlements are located in areas of very poor accessibility to town centres and economic areas. Overall, a major negative impact on accessibility is identified.
- C.12.6.4 Approximately 63% of New Settlement F1 is located within Priority Area 3. However, approximately 37% of the new settlement is not located within any priority area. A minor negative impact has been identified for New Settlement F1 on accessibility.
- C.12.6.5 New Settlement X1 is wholly located within Priority Area 3, 90% of New Settlement BW, 97% of New Settlement C1 and 94% of New Settlement X2 is located within Priority Area 3. Some 74% of New Settlement B1 is located within Priority Area 3 and 26% is located within Priority Area 2. A negligible impact on accessibility is identified for these five new settlements.

Table C.12.1: Impact matrix of new settlements for accessibility – SA Objective 11

New Settlement	Bus stop	Railway station	Food Stores	Connectivity	Priority Area	SA11 ranking
A1	-	++	-	+/-	--	3 rd
A2	-	++	-	+/-	--	2 nd
B1	-	+	-	-	0	5 th
BW	-	++	-	-	0	4 th
C1	-	++	+	0	0	1 st
E1	-	-	-	+/-	+	6 th
F1	-	-	-	+/-	-	9 th
F2	-	-	-	+/-	--	10 th
F3	-	-	-	+/-	--	12 th
G1	-	-	-	+/-	--	11 th
X1	-	-	-	+/-	0	7 th
X2	-	-	-	+/-	0	8 th

C.12.7 Ranking

- C.12.7.1 All 12 new settlements have poor access to bus services and nine of the new settlements are in areas not assessed within the ‘South Warwickshire Settlement Analysis’, therefore, less weighting has been given to these receptors. The assessments are based on existing infrastructure provision and do not factor in capacity or new railway stations, bus services or local services that could be provided alongside development.
- C.12.7.2 New Settlement C1 is identified as the **best performing** option for transport and accessibility (SA Objective 11). New Settlement C1 is located within sustainable distance to Lapworth Train Station and is also the only new settlement located within sustainable distance to an existing local shop, partially located within sustainable distance to a village shop in Kingswood, located 320m north of the settlement.

- C.12.7.3 There is little separating New Settlements A1 and A2 in regard to ranking. However, a larger proportion of New Settlement A2 is located within sustainable distance to a railway station, partially located within sustainable distance to three railway stations (Wood End Station, The Lakes Station and Danzey Station), whereas the majority of New Settlement A1 is located within sustainable distance to Danzey Station only, meaning that A1 may perform slightly better.
- C.12.7.4 Similarly, although there is little separating New Settlements B1 and BW, BW could be seen to perform slightly better, where the majority lies within sustainable distance to a railway station, whereas New Settlement B1 is only located partially within sustainable distance to a railway station.
- C.12.7.5 New Settlements E1, F1, X1 and X2 all have poor access to the existing local transport network and are ranked lower against transport and accessibility. New Settlement E1 is located in areas of strong accessibility, where at least 50% of the indicative area lies within Priority Areas 1 and 2, and less than 30% lies outside of all priority areas. New Settlement F1 is located in areas of poorer accessibility, where over 30% of the new settlement is not located within a priority area. There is little separating New Settlements X1 and X2, however, New Settlement X1 is located wholly within Priority Area 3, in comparison to New Settlement X2 where approximately 6% is not located within any priority area.
- C.12.7.6 There is little separating New Settlements F2, F3 and G1, where all three new settlements are poorly located in relation to existing transport infrastructure. However, New Settlement F2 is partially located within 400m to a bus stop, in comparison to New Settlements F3 and G1 that are wholly located outside sustainable distance to a bus stop. New Settlements F3 and G1 perform similarly across all receptors, however, New Settlement G1 despite not being located within sustainable distance to a bus stop or railway station is located in proximity to more bus stops and is located closer to the nearest railway station than New Settlement F3. New Settlement F3 is identified as the **worst performing** new settlement for transport and accessibility (SA Objective 11).

C.12.8 Mitigation

- C.12.8.1 The large scale of development proposed at a new settlement is likely to place increased demand on existing local services. There is potential for pressures on accessibility to be largely mitigated, primarily through investing in provision for public transport, active travel networks, and local shops. This might involve extending bus services, adding new bus stops and improving the regularity of services, for instance. The potential for “*substantial internalisation of trips*” is a core intention of the Councils regarding new settlements, as highlighted within Draft Policy Direction 2 (see **Appendix E**).
- C.12.8.2 Given the location of new settlements in relation to the existing railway network, there may be opportunities for new railway stations to be provided alongside development which will improve access and connectivity to wider public transport networks and local services, although this may require a significant level of investment and planning. Improving active travel networks and better integration of public transportation to existing or future railway stations can improve sustainable accessibility for new settlements and encourage uptake of these transport modes.

C.12.8.3 Planning new settlements to support the 20-minute neighbourhood concept⁵⁸ will facilitate walkable neighbourhoods that are safe, highly accessible to all members of the community and encourage active modes of travel such as cycling through segregated cycle lanes for example. Planning for a neighbourhood which includes high-quality connections of local services will encourage people to travel by foot or other active modes of travel and facilitates healthy lifestyles, which can also help to minimise traffic, reduce congestion and improve air quality. Development should make use of the National Design Guide⁵⁹ which sets out ways to plan for a well-designed connected network which provides residents with a choice in how to make their journeys and highlights the importance of active travel and suitable transport infrastructure.

⁵⁸ TCPA (2021). 20-minute Neighbourhoods. Creating Healthier, Active, Prosperous Communities an Introduction for Council Planners in England. Available at: https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf [Date accessed: 01/11/24]

⁵⁹ DLUHC (2021). National Design Guide. Available at: https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf [Date accessed: 05/11/24]

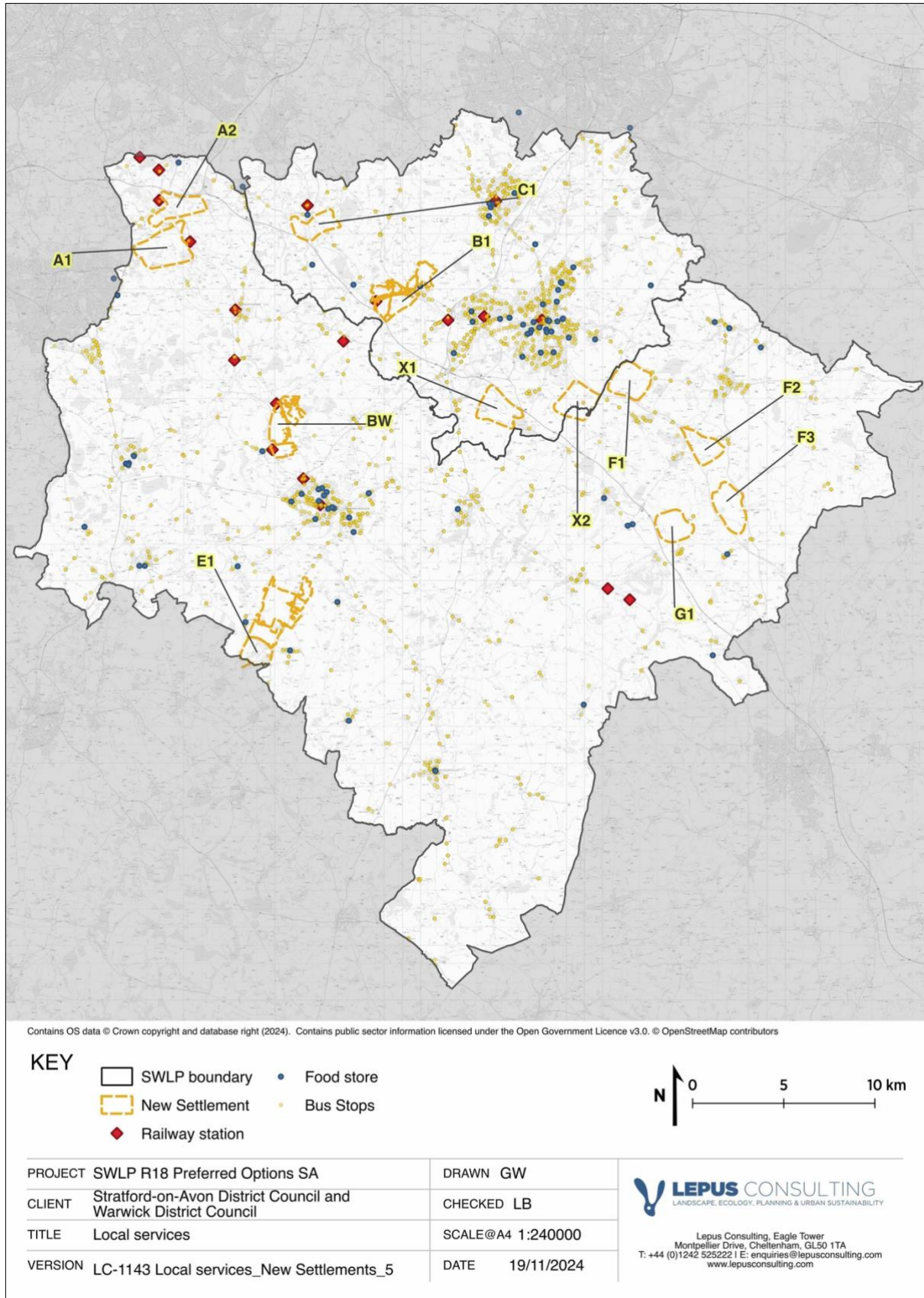


Figure C.12.1: Local services within the SWLP area

C.13 SA Objective 12: Education

C.13.1 Overview

- C.13.1.1 Various education facilities are located across the SWLP area, including primary schools, secondary schools and higher education facilities.
- C.13.1.2 It is acknowledged that new schools and educational facilities could be provided alongside the development of a new settlement. However, it may be more likely that existing schools and educational facilities can be expanded to cater for the new settlement rather than the development of a new school.
- C.13.1.3 The impact matrix of all 12 new settlements and the ranking against education (SA Objective 12) is presented within **Table C.13.1**.

C.13.2 Primary schools

- C.13.2.1 Given the distribution of existing schools across the SWLP area, new settlements directed to rural areas are more isolated and are likely to have more limited sustainable access and longer travel times to schools. Three new settlements (A1, A2 and C1) are partially located within sustainable distance to an existing primary school. New Settlement A1 is located 100m from Tanworth-in-Arden Church of England Primary School, where the north of the settlement is within a sustainable distance of 800m to the school. New Settlement A2 is located approximately 310m from Tanworth-in-Arden Church of England Primary School, where the south of the settlement is within sustainable distance. New Settlement C1 is located 450m from Lapworth Church of England Primary School, where the north of the settlement is within sustainable distance. The development at these three settlements will be expected to locate residents in areas with sustainable access to existing primary schools and a minor positive impact is identified.
- C.13.2.2 The remaining nine new settlements (B1, BW, E1, F1, F2, F3, G1, X1 and X2) are located outside sustainable distance to an existing primary school. New Settlement F2 located nearest to Bishop's Itchington Primary School, located 850m from the new settlement at its closest point, and New Settlement F3 located the furthest from a primary school, located 1.4km from the Dasset Church of England Primary School. Development at these nine settlements is likely to locate residents in areas with poor access to existing primary schools and a minor negative impact is identified.

C.13.3 Secondary schools

- C.13.3.1 Secondary schools in South Warwickshire are primarily located within and around Royal Leamington Spa, Stratford-upon-Avon, and Alcester. All 12 of the new settlements are located outside of the recommended 1.5km sustainable distance to existing secondary schools. New Settlement X2 is located 1.51km from Oakley School at its closest point and is therefore just outside the sustainable distance to secondary schools, where the majority is outside sustainable distance. New Settlement F3 is located the furthest from a secondary school, located 5.8km from Southam College. Development at all 12 of the new settlements is likely to locate residents in areas with poor access to existing secondary schools and a minor negative impact is identified.

C.13.4 Higher education

C.13.4.1 Various higher education facilities for 16–18-year-olds, including six forms and colleges, are located in and around the SWLP area. The majority of these are located within Stratford-upon-Avon and Bridge End, Warwick. Eight new settlements (A1, B1, BW, C1, F1, F2, X1 and X2) are located within sustainable distance to a higher education facility. For example, New Settlement F1 is located 3.1km from Southam College to the east of settlement area and 3.1km from Campion School to the west of the settlement and New Settlement A1 is located 3.1km from Arrow Vale Sixth Form located outside the Plan area. Development at these eight new settlements is likely to locate residents in areas with sustainable access to higher education facilities and a minor positive impact is identified.

C.13.4.2 The remaining four new settlements (A2, E1, F3 and G1) are either largely or wholly located outside of the sustainable distance to a higher education facility. The nearest higher education facility to New Settlement A2 is Woodrush High School Sixth Form located 4.9km from the new settlement, outside of the Plan area and only providing sustainable access to a small proportion of the settlement area in the north. The nearest higher education facility to E1 is Stratford Girls Grammar School located 3.5km from the new settlement, providing sustainable access to a small proportion of residents to the north of the settlement area. The nearest higher education facility to New Settlement F3 is Southam College located 5.8km from the new settlement. The nearest higher education facility to New Settlement G1 is Kineton High School located 4.5km from the new settlement, providing sustainable access only to a small proportion to the west of the settlement area. Development at these four new settlements is likely to locate residents in areas with more limited access to higher education facilities and a negligible impact is identified.

Table C.13.1: Impact matrix of new settlements for education – SA Objective 12

New Settlement	Primary school	Secondary school	Higher education	SA12 ranking
A1	+	-	+	2 nd
A2	+	-	0	3 rd
B1	-	-	+	9 th
BW	-	-	+	8 th
C1	+	-	+	1 st
E1	-	-	0	10 th
F1	-	-	+	6 th
F2	-	-	+	7 th
F3	-	-	0	12 th
G1	-	-	0	11 th
X1	-	-	+	4 th
X2	-	-	+	5 th

C.13.5 Ranking

C.13.5.1 The assessments are based on sustainable access to schools, and this does not take into account capacity of local schools or provision of new school places with development.

- C.13.5.2 New Settlement C1 is identified as the **best performing** new settlement against education (SA Objective 12). New Settlements C1 and A1 are difficult to separate in the ranking, as both are located within sustainable distance to a primary school and to a higher education facility. To separate the two new settlements, the proportion of the new settlements area within the sustainable target distance to primary schools and higher education facilities has been used to inform the ranking. At New Settlement C1 approximately 17% of the settlement area is located within a sustainable distance to a primary school and 100% is located within sustainable distance to a higher education facility. At New Settlement A1 approximately 14% of the settlement area is located within sustainable distance to a primary school and 62% within sustainable distance to a higher education facility. As such, New Settlement A1 has been ranked as second for the ranking against education.
- C.13.5.3 New Settlement A2 is located within the recommended target distance to Tanworth-in-Arden Church of England Primary School, locating residents in areas with sustainable access to existing primary schools. However, the new settlement is located outside sustainable distance to a higher education facility. As such, New Settlement A2 has been ranked third against education.
- C.13.5.4 New Settlements B1, BW, F1, F2, X1 and X2 are located outside the sustainable distance to existing primary schools. All six of these new settlements are located within sustainable distance to a higher education facility. The new settlements have been ranked based on proximity to higher education facilities and the number of educational facilities within the surrounding area, which will be expected to provide a greater range of education opportunities.
- C.13.5.5 New Settlement F1 is located within sustainable distance to Southam College to the east and Champion School to the west, and New Settlement F2 is located within sustainable distance to Southam College. New Settlements X1 and X2 are located within a sustainable distance to multiple higher education facilities, including Champion School, Kings High School for Girls and Warwick School. New Settlements X1 and X2 will be expected to perform slightly better than New Settlements F1 and F2 as they will provide access to multiple higher education facilities, providing residents with a greater range of education opportunities. As New Settlement X1 is located closer to more higher education facilities it has been ranked as better performing for overall access to education. New Settlement F1 is identified as providing better access to education than New Settlement F2, where it provides access to two higher education facilities in comparison to one at F2.
- C.13.5.6 New Settlement F3 is identified as the **worst performing** new settlement against education (SA Objective 12). New Settlements E1, F3 and G1 are located outside sustainable distance to primary schools, secondary schools and higher education facilities. The three new settlements are difficult to separate in regard to ranking, however 23% of New Settlement E1 and 13% of New Settlement G1 are located within sustainable distance to a higher education facility, in comparison to 0% at New Settlement F3, therefore New Settlement E1 and G1 will locate a small proportion of residents within sustainable distance to a higher education facility. The nearest secondary school to New Settlement G1 is approximately 4.6km away, in comparison to New Settlement E1 where the nearest secondary school is 3.8km away, therefore New Settlement E1 will be expected to locate residents within closer proximity to an existing secondary school.

C.13.6 Mitigation

- C.13.6.1 New settlements are located within rural areas where access to existing schools is limited. The most feasible way to ensure new residents have sufficient access to schools is by developing parcels which are already located within a sustainable distance to educational facilities, where these can be absorbed into existing schools. Through liaison with the education authority (Warwickshire County Council), the expansion of existing schools and construction of new schools should also be implemented to avoid placing further pressure on places at existing schools. New settlements will be expected to provide supporting infrastructure such as educational facilities which will help to address accessibility gaps. The type and size of these educational facilities is unknown, but it is expected that any new educational facility will be able to accommodate the large-scale growth at the new settlement.
- C.13.6.2 Improvements to sustainable public transport and active travel measures may improve access to current or future education facilities, including primary schools, secondary schools and higher education facilities. To encourage active travel for all schools including primary schools, public footpaths and safe pedestrian walkways and road crossings should be well-maintained, and opportunities should be sought to improve cycling provision.
- C.13.6.3 Furthermore, planning new settlements to support the 20-minute neighbourhood concept⁶⁰ will facilitate walkable neighbourhoods that are safe, highly accessible to all members of the community and improve access to local services such as educational facilities.

⁶⁰ TCPA (2021). 20-minute Neighbourhoods. Creating Healthier, Active, Prosperous Communities an Introduction for Council Planners in England. Available at: https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf [Date accessed: 01/11/24]

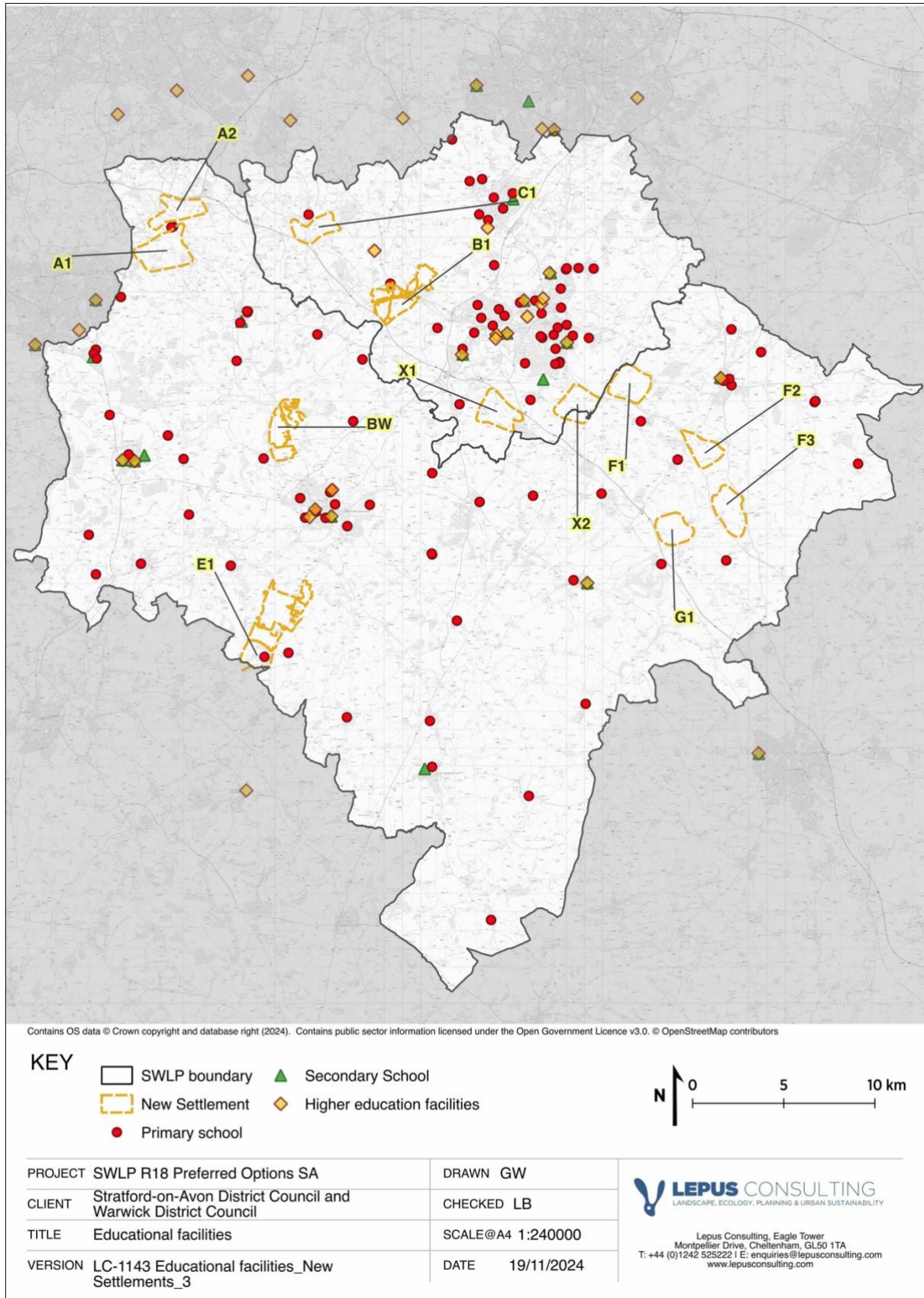


Figure C.13.1: Educational facilities within and around the SWLP area

C.14 SA Objective 13: Employment

C.14.1 Overview

- C.14.1.1 The SWLP area includes a variety of employers, that are located in both urban and rural areas. Notable employers include various industrial estates such as Heathcote Industrial Estate and Sydenham Industrial Estate, Leamington Spa, technology development companies and car manufacturers.
- C.14.1.2 The impact matrix of all 12 new settlements and the ranking against employment (SA Objective 13) is presented within **Table C.14.1**.

C.14.2 Access to existing employment opportunities

- C.14.2.1 Eight new settlements (B1, BW, E1, F1, F2, G1, X1 and X2) are located within sustainable distance to an existing key employment location. New Settlement B1 is located 1.6km from 'Opus 40, Warwick', which includes various businesses including IBM. New Settlement BW is located 1.6km from 'Shottery Brook Business Park', which includes multiple businesses such as Goo Fitness and shops such as the Coop. New Settlement E1 is located adjacent to 'Bird Industrial Estate', which includes businesses such as Dawsons Cars Dealership. New Settlements F1 and F2 are located within sustainable distance to 'West of Kineton Road/Hollywell, Southam' industrial estate, New Settlement F1 is located approximately 3.2km west and New Settlement F2 located approximately 1.9km south. The 'West of Kineton Road/Hollywell, Southam' industrial estate includes shops such as Tesco and Screwfix and businesses such as RM Design and Engineering, J.M.L Engineering, Fine Tolerance Flooring and Alumet Systems UK. New Settlement G1 is located approximately 1.7km east of the principal engineering centre for Jaguar Land Rover and also includes Aston Martin and the British Motor Museum Conference. New Settlement X1 is located 2.2km south of 'Tournament Court, Warwick', which includes various businesses such as Apex Recruitment and Stipenda Ltd. New Settlement X2 is located 2.3km south of 'Tachbrook Park and Spa Park', which includes a variety of businesses, such as car manufacturers like Renault, Mazda, Volkswagen and Volvo, and energy and gas businesses such as Calor Gas Ltd and Octopus Energy. Therefore, New Settlements B1, BW, E1, F1, F2, G1, X1 and X2 will be expected to locate residents in areas with sustainable access to employment opportunities and a minor positive impact on the economy is identified.
- C.14.2.2 The remaining four new settlements (A1, A2, C1 and F3) are located outside sustainable distance to an existing key employment location. Development proposed at these locations will be expected to locate residents in areas with limited sustainable access to existing employment locations and a minor negative impact on the economy is identified.

C.14.3 Employment floorspace

- C.14.3.1 Employment floorspace has been assessed with consideration of current land use. All 12 new settlements comprise of undeveloped land and without specific details in relation to the provided associated infrastructure and number of jobs created, the overall effect on employment floorspace and job provision is uncertain.

C.14.3.2 All 12 new settlements include farmland which could currently serve the rural economy and provide job opportunities to a small population within the SWLP area. Furthermore, some new settlements include businesses, such as ‘JMT Engineering, Ladbroke’ within New Settlement F2 and ‘Leamington Football Club’ within New Settlements X2. However, the extent of job creation of these areas and whether these businesses will be retained is unknown.

C.14.3.3 Overall, it is uncertain whether development at all 12 new settlements will result in a net gain or loss in employment floorspace.

Table C.14.1: Impact matrix of new settlements for employment – SA Objective 13

New Settlement	Access to existing employment opportunities	Employment floorspace	SA13 ranking
A1	-	+/-	11 th
A2	-	+/-	12 th
B1	+	+/-	1 st
BW	+	+/-	6 th
C1	-	+/-	9 th
E1	+	+/-	5 th
F1	+	+/-	7 th
F2	+	+/-	8 th
F3	-	+/-	10 th
G1	+	+/-	4 th
X1	+	+/-	2 nd
X2	+	+/-	3 rd

C.14.4 Ranking

C.14.4.1 The extent of job creation and implications for the agricultural sector at all 12 new settlements is unknown and therefore employment floorspace provision has not been considered within the ranking of the 12 new settlements.

C.14.4.2 New Settlement B1 is identified as the **best performing** new settlement for employment (SA Objective 13). There is little separating New Settlements B1, X1, X2 and G1, however New Settlement B1 is located adjacent to Birmingham Road, providing access to Warwick and is also located within sustainable distance to Hatton Railway Station and could potentially reduce travel time to surrounding employment locations. New Settlement X1 is located adjacent to the M40 and could potentially reduce travel time to surrounding employment locations and can also connect residents to local public transport services, which will enable access to a wider range of employment opportunities. New Settlement G1 is located adjacent to the M40, however is located more rurally than New Settlement X1 and New Settlement X2 and may provide residents with a more limited variety of employment opportunities or longer travel times.

C.14.4.3 There is little separating New Settlements BW, E1, F1 and F2. New Settlement E1 is located adjacent to Bird Industrial Estate and will be expected to locate residents within closer proximity to a key employment location, offering greater opportunity to travel by foot and other means of active travel. New Settlements BW and F1 are located in a less rural location in comparison to New Settlement F2, located closer to surrounding settlements including Stratford-upon-Avon for New Settlement BW and Warwick for New Settlement F1, which will be expected to provide residents with a variety of employment opportunities. New Settlement BW is located adjacent to the A4300 and within a sustainable distance to Bearley Railway Station and Wilmcote Railway Station which will be likely to provide residents with greater access to surrounding employment locations than New Settlement F1.

C.14.4.4 New Settlement A2 is identified as the **worst performing** new settlement for employment (SA Objective 13). However, there is little separating New Settlements A1, A2, C1 and F3 which are all identified to have a minor negative impact on access to employment. New Settlement A1 is wholly located outside sustainable distance to a key employment location, in comparison to New Settlements A2, C1 and F3 that are partially located within sustainable distance to a key employment location. New Settlement C1 locates a greater proportion of the settlement area within sustainable distance to a key employment location than New Settlements A2 and F3, which will therefore be expected to provide some residents with sustainable access. New Settlement A1 is located in a less rural location than New Settlement F3, located within close proximity to the A43 which provides links to Redditch and is also located within sustainable distance to Danzey Railway Station, and will therefore potentially provide residents with greater employment opportunities.

C.14.5 Mitigation

C.14.5.1 Development can firstly avoid the loss of employment floorspace through the careful design and layout of future proposals. Where there is potential for loss of employment floorspace, relocation of existing floorspace can ensure that the needs of residents are continued to be met. Any loss of employment floorspace may be disruptive to the residents which it serves, however, the SWLP will aim to provide a net gain in employment floorspace over the Plan period and therefore any loss is likely to be reversible.

C.14.5.2 Planning new settlements to support the 20-minute neighbourhood concept⁶¹ will provide residents with sustainable access to public transport, encourage active travel and will likely co-locate residential development with some local employment opportunities, providing benefits to the local economy. Development should also include provision of high-speed fibre internet to allow for home working, improved efficiency for local businesses and enable greater employment opportunities.

⁶¹ TCPA (2021). 20-minute Neighbourhoods. Creating Healthier, Active, Prosperous Communities an Introduction for Council Planners in England. Available at: https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf [Date accessed: 01/11/24]

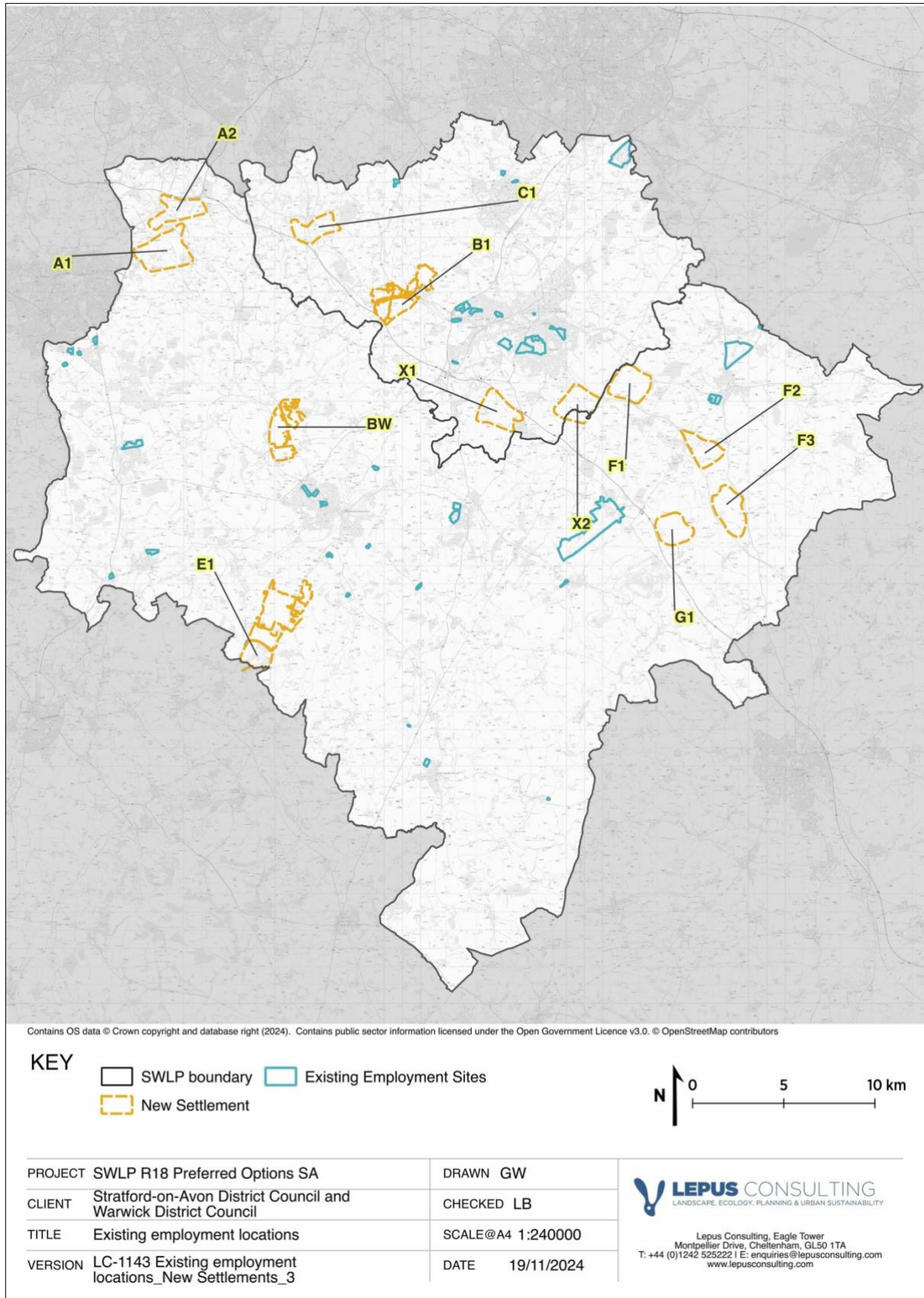


Figure C.14.1: Existing employment locations in the SWLP area

C.15 Constraints mapping

C.15.1 Overview

- C.15.1.1 The following **Figures C.15.1 to C.15.24** provide an overview of some of the factors that have been considered in the evaluation and ranking exercise as presented in the preceding sections of this appendix.
- C.15.1.2 For each of the 12 new settlement options, two maps are provided: the first provides an overview of some (but not all) of the key constraints that can be found within and surrounding the indicative boundaries for each of the new settlement options; and the second provides more visual illustration and context in relation to some of the constraints and features within or nearby the new settlement locations.

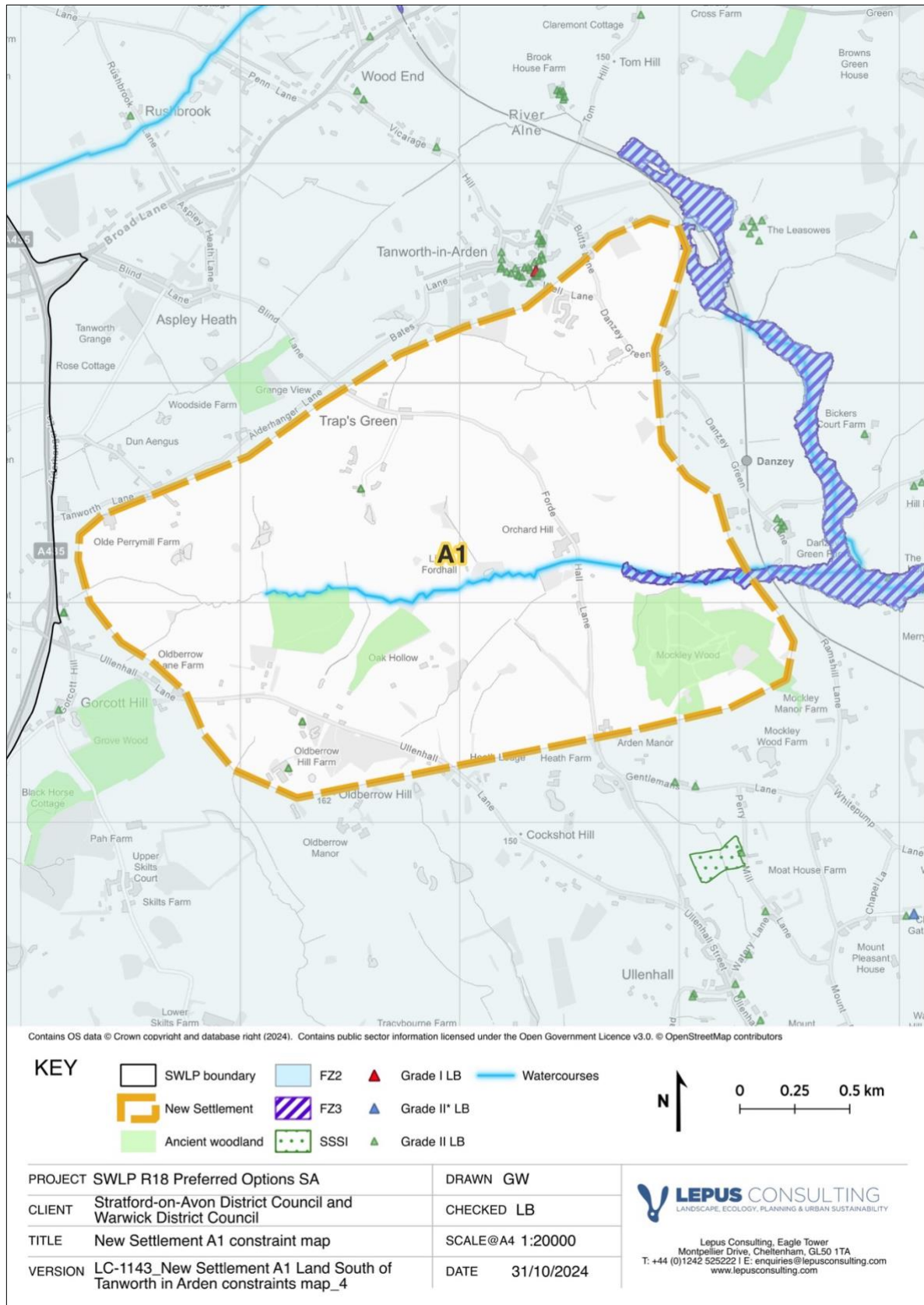


Figure C.15.1: Identified key constraints at New Settlement A1 Land South of Tanworth-in-Arden

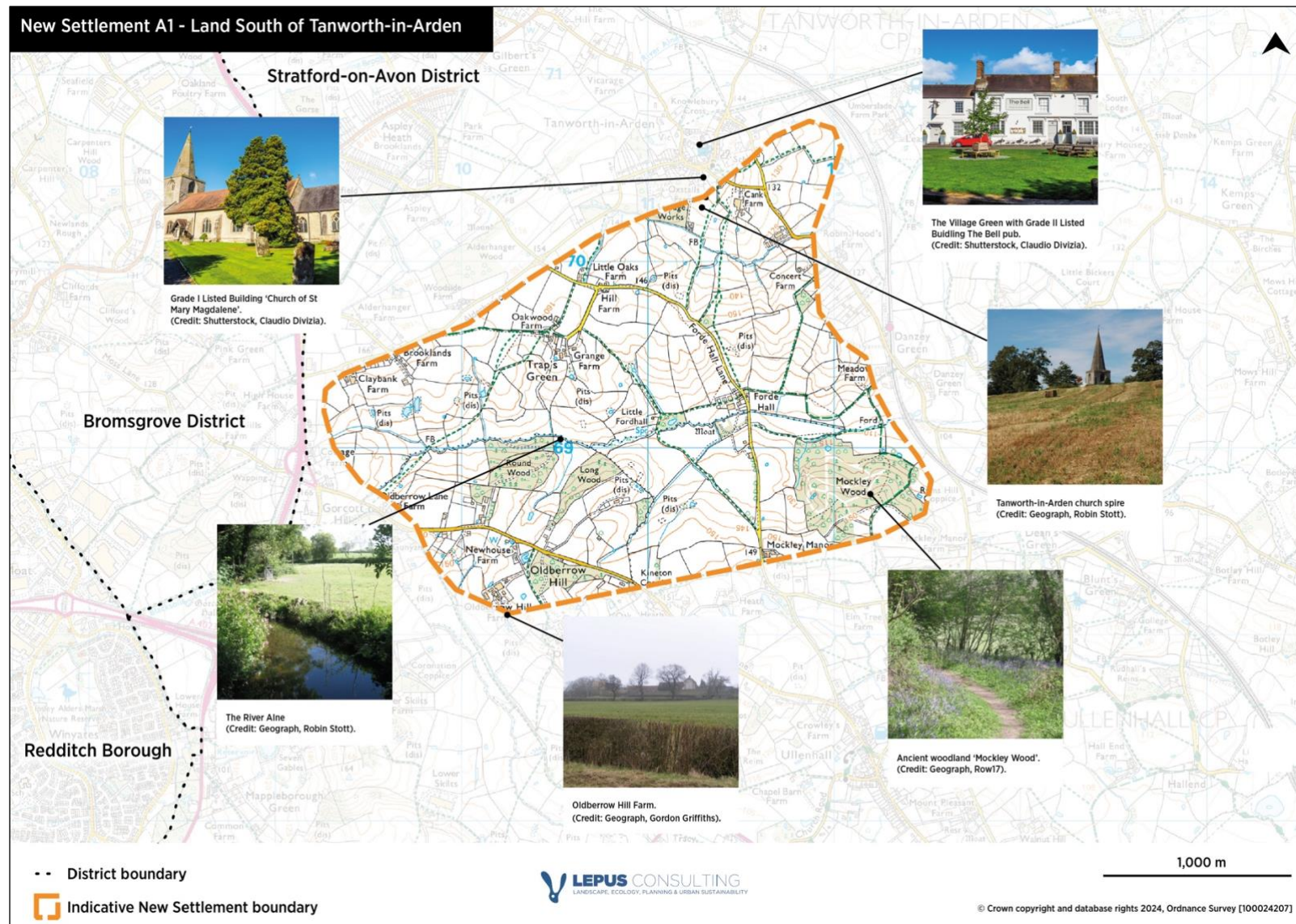


Figure C.15.2: Constraints and features at New Settlement A1 Land South of Tanworth-in-Arden

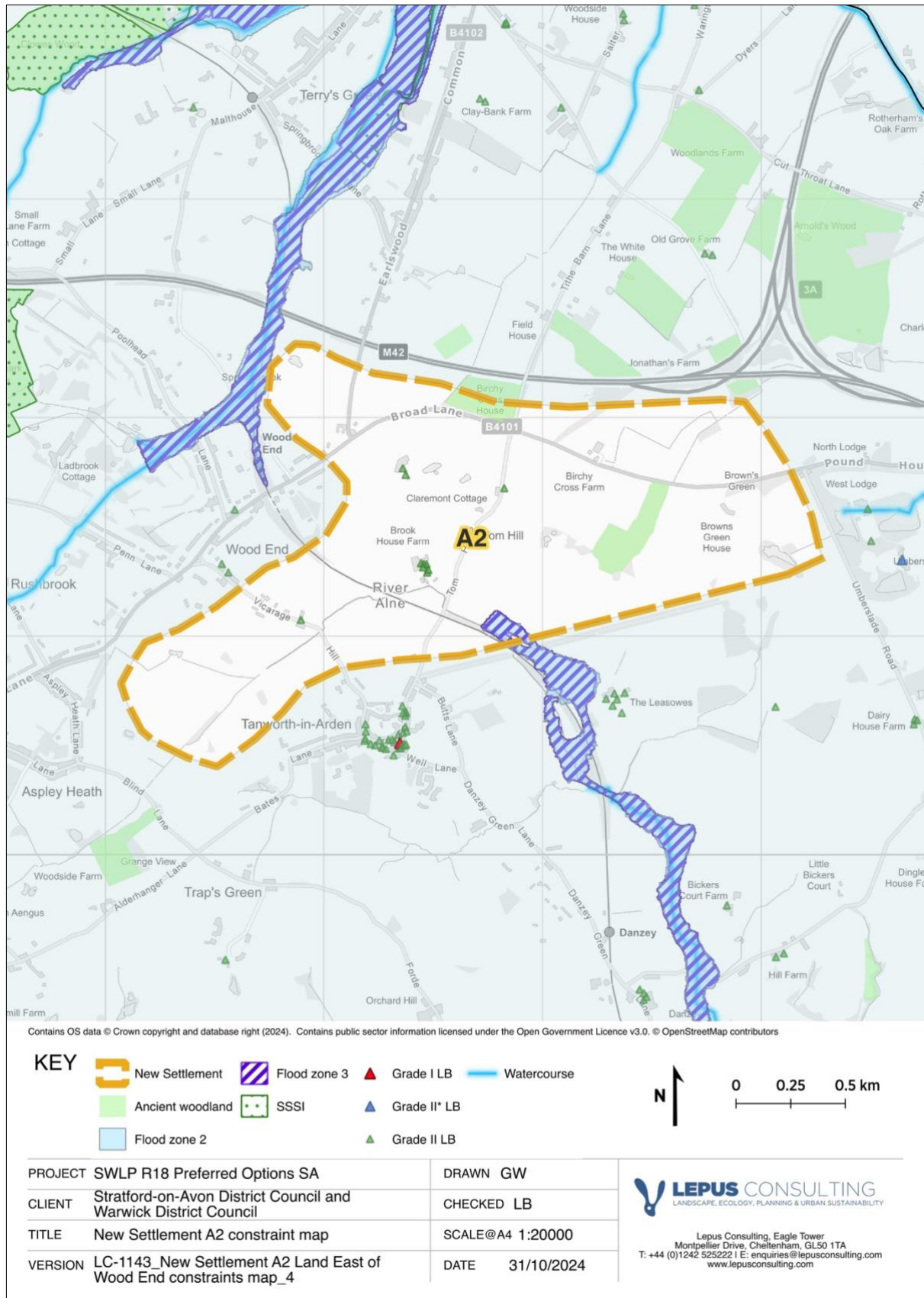


Figure C.15.3: Identified key constraints at New Settlement A2 Land East of Wood End

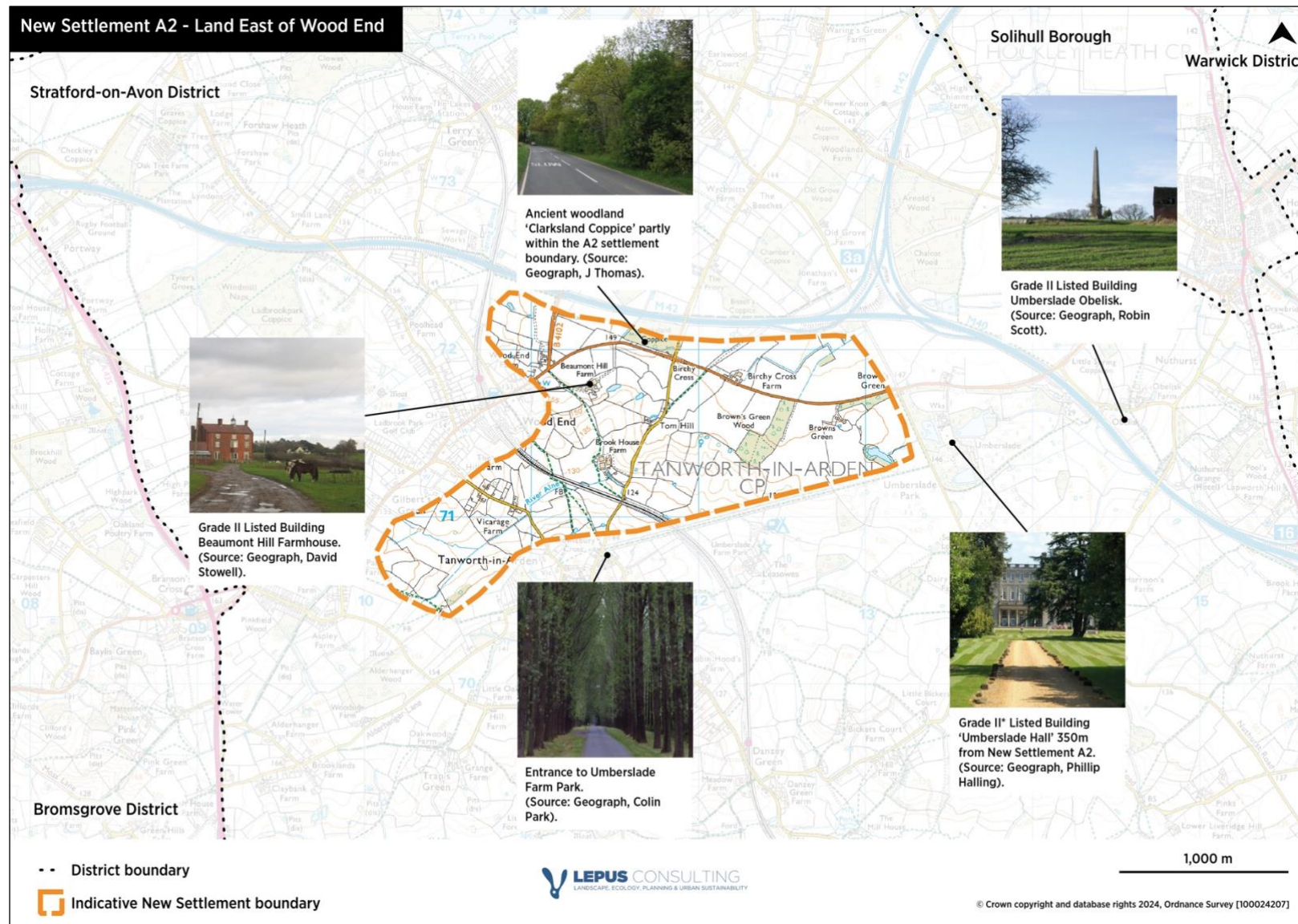


Figure C.15.4: Constraints and features at New Settlement A2 Land East of Wood End

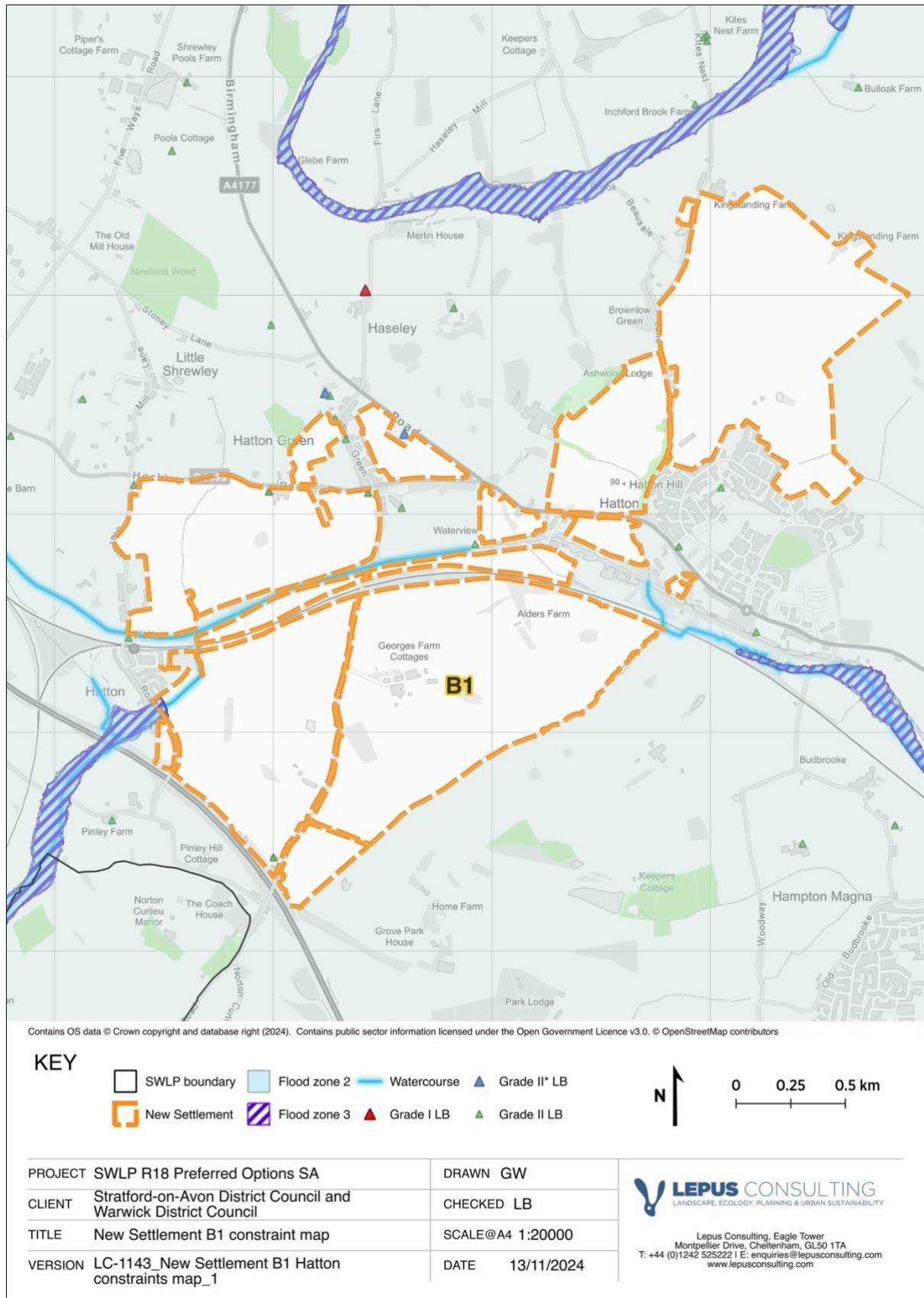


Figure C.15.5: Identified key constraints at New Settlement B1 Land at Hatton

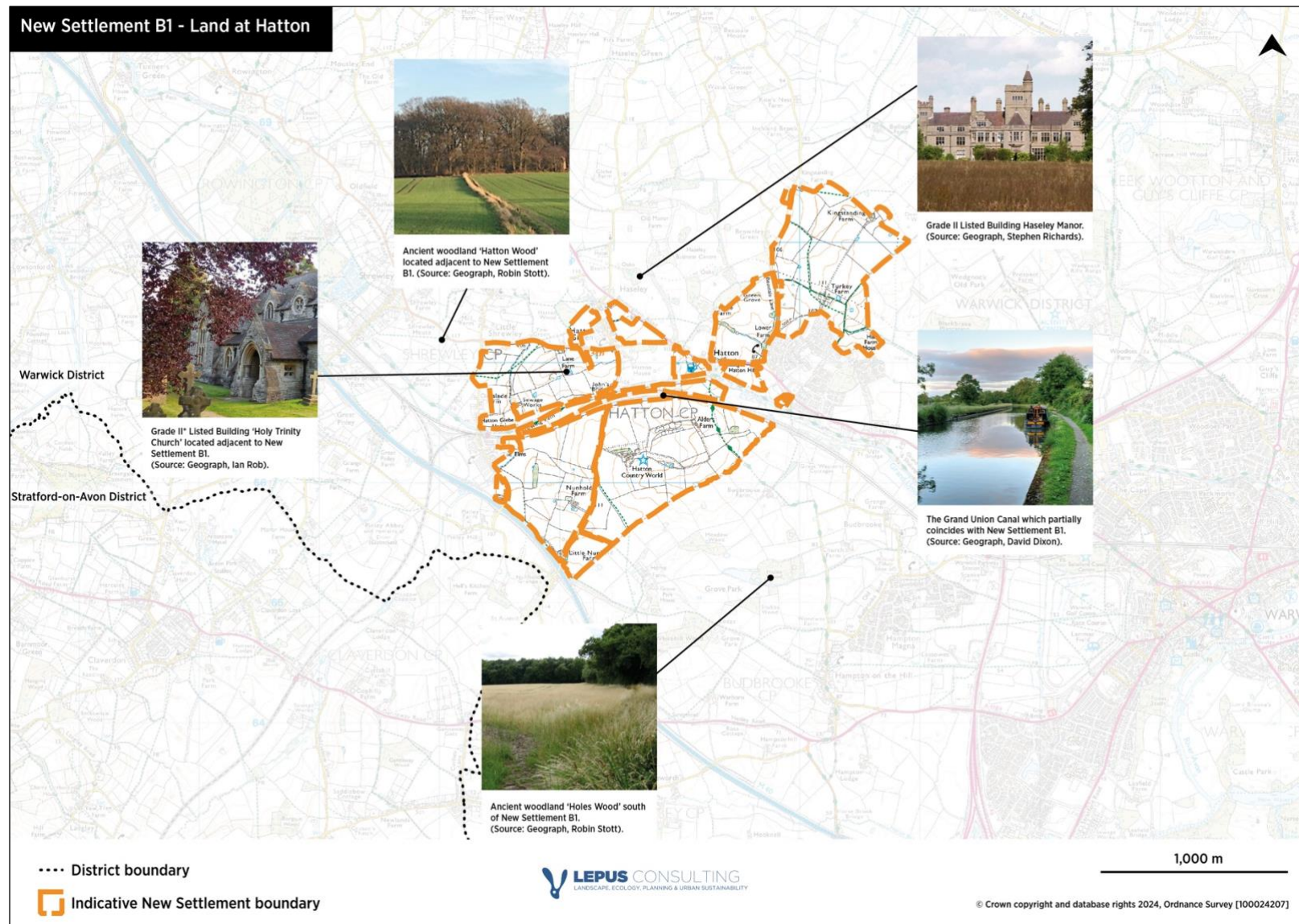


Figure C.15.6: Constraints and features at New Settlement B1 Land at Hatton

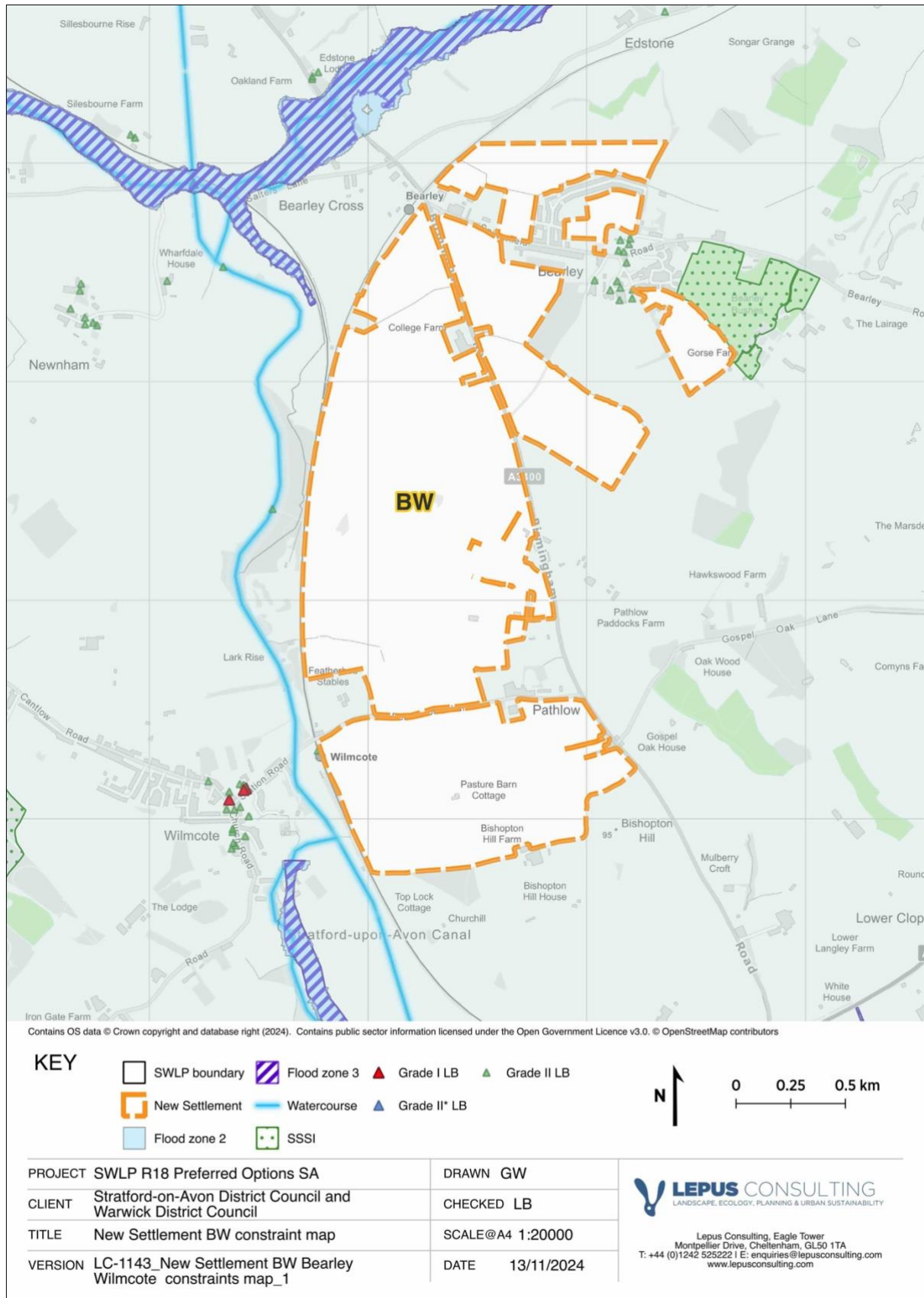


Figure C.15.7: Identified key constraints at New Settlement BW Land at Bearley and Wilmcote

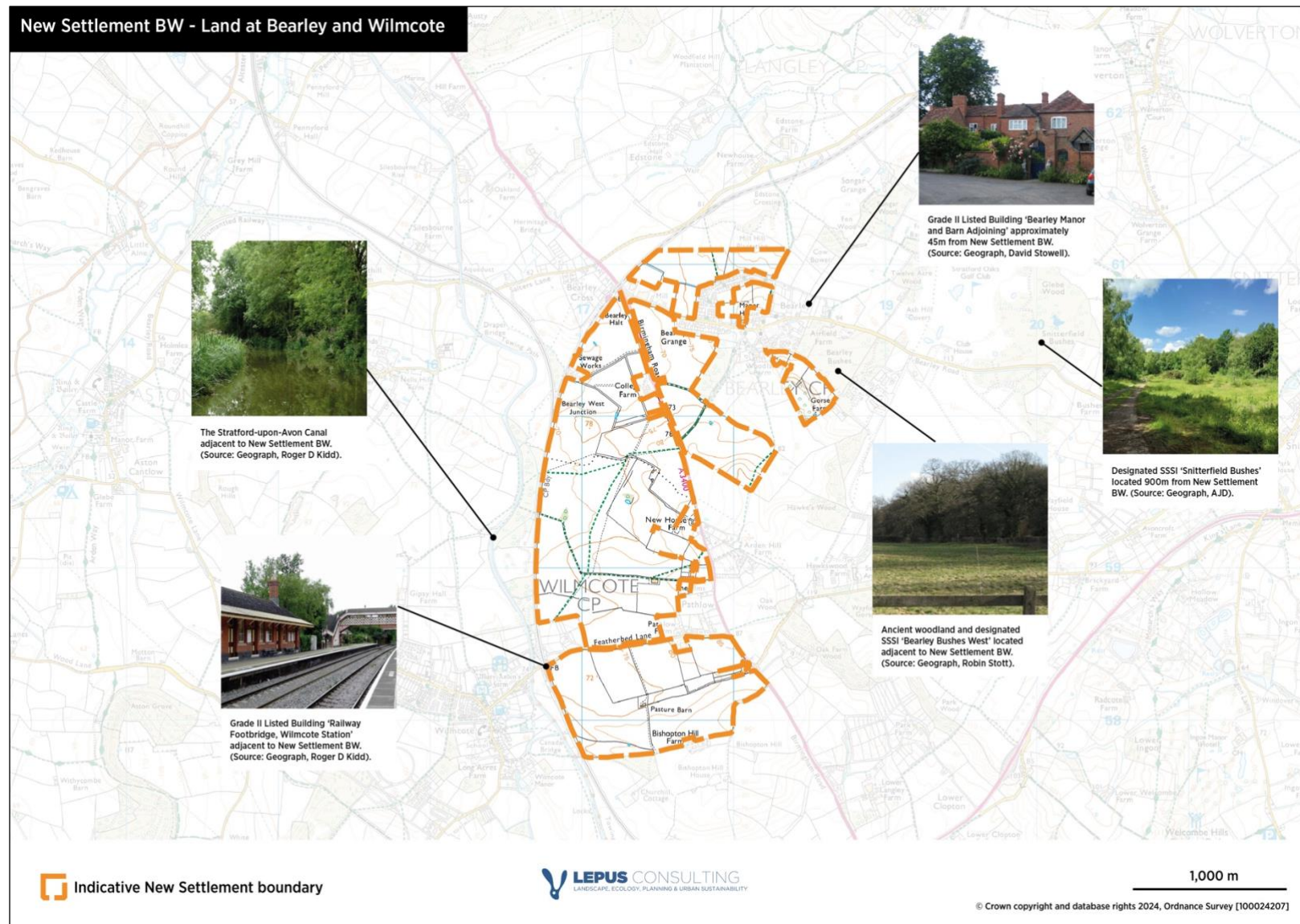


Figure C.15.8: Constraints and features at New Settlement BW Land at Bearley and Wilmcote

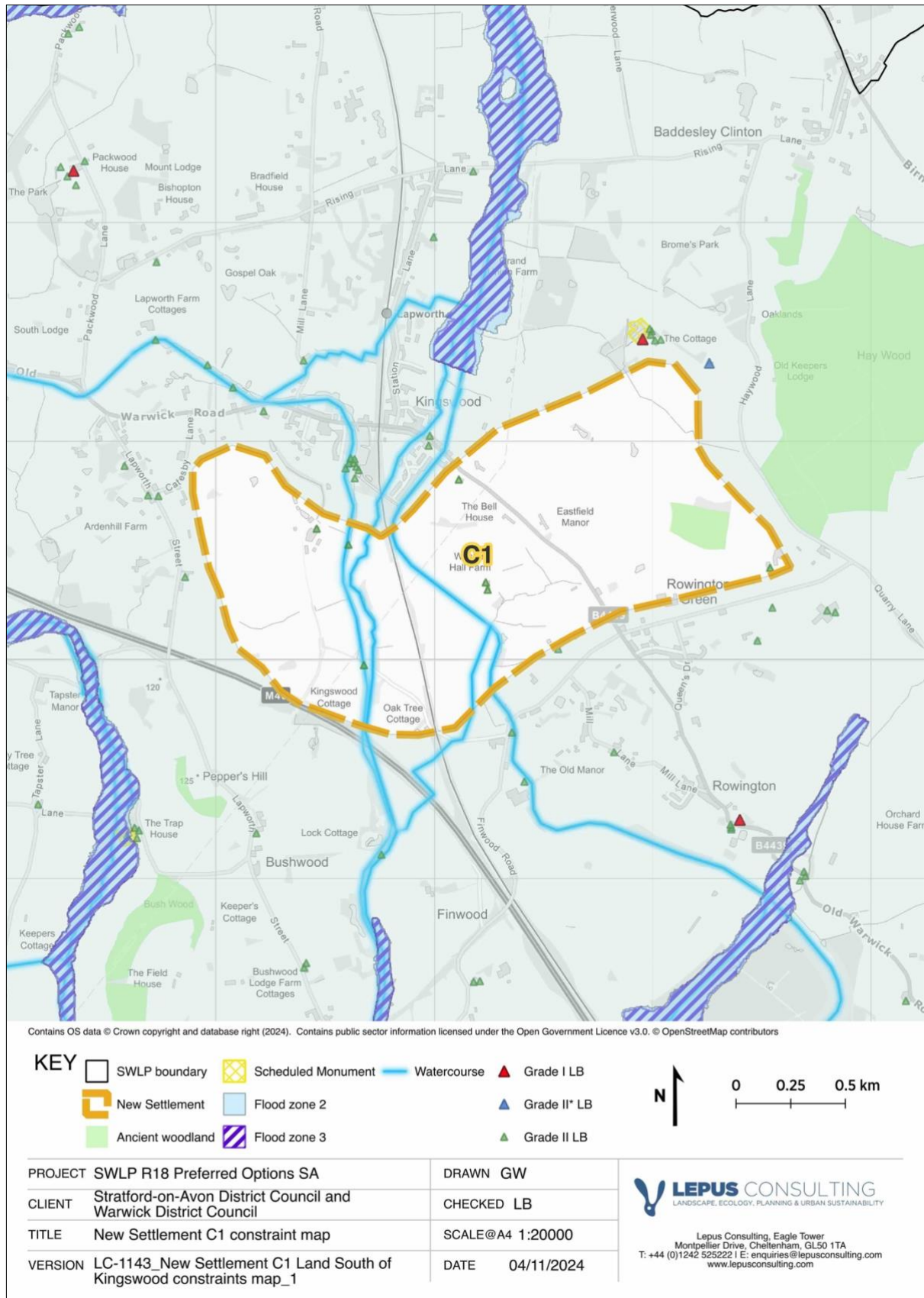


Figure C.15.9: Identified key constraints at New Settlement C1 Land South of Kingswood

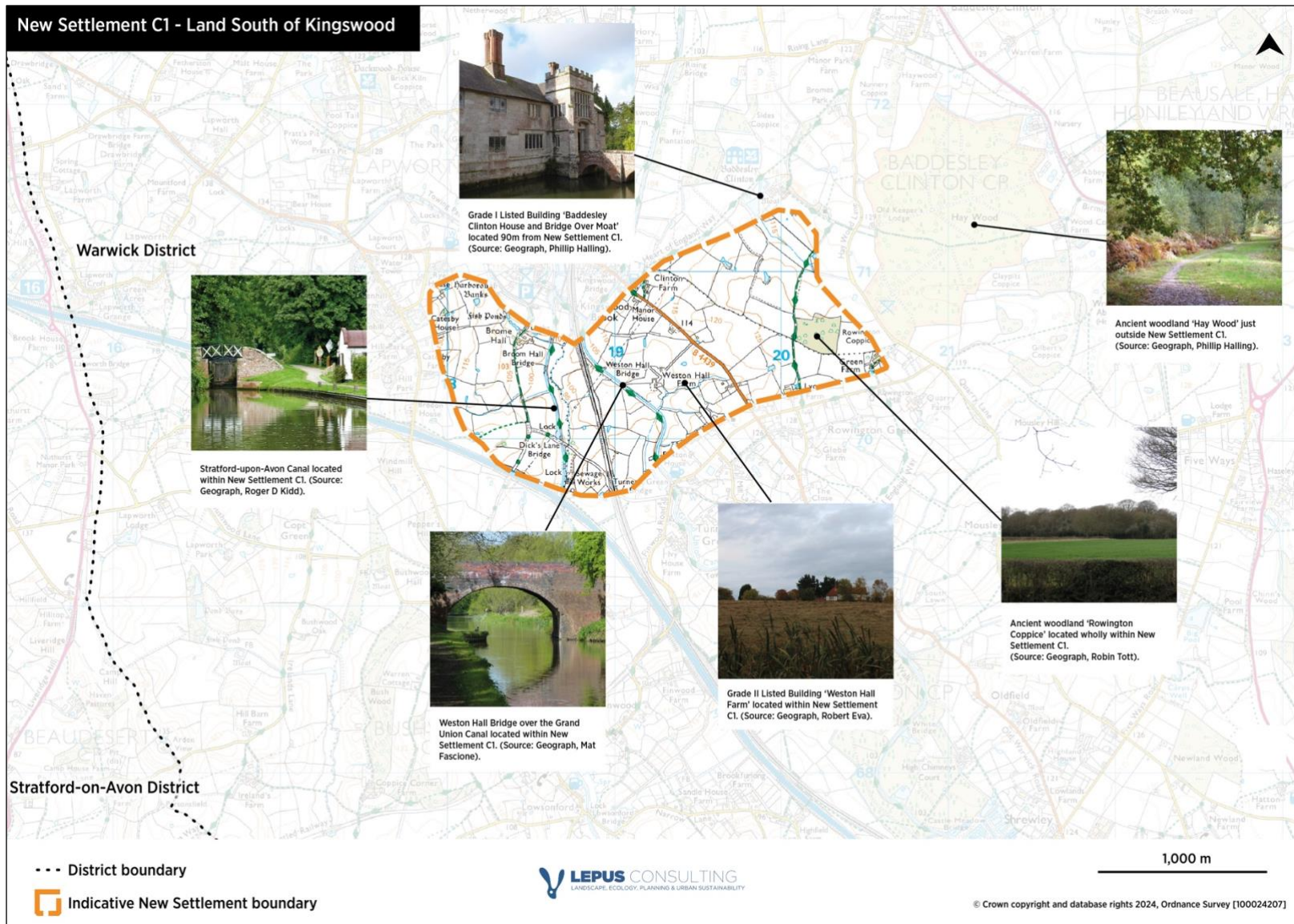


Figure C.15.10: Constraints and features at New Settlement C1 Land South of Kingswood

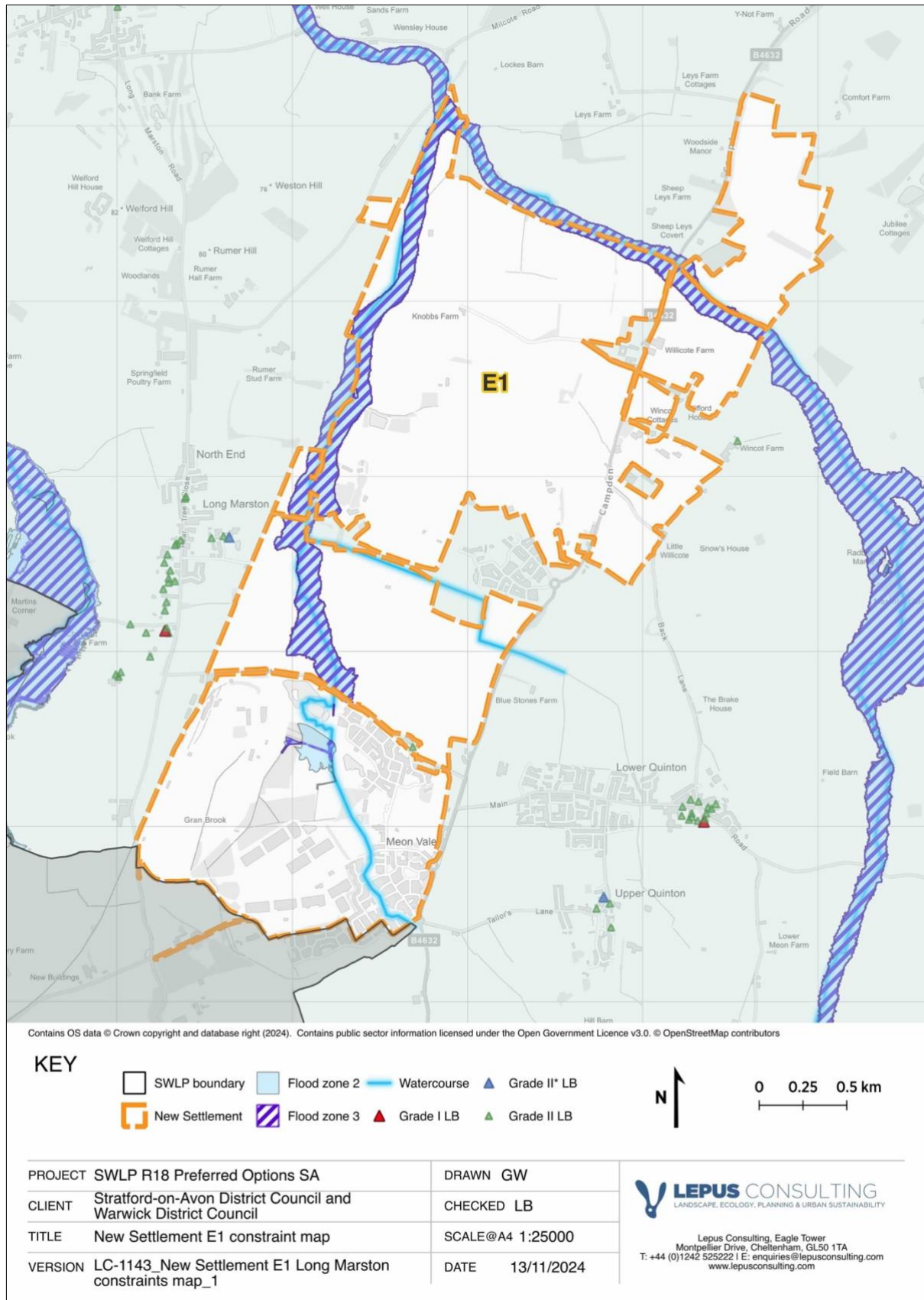


Figure C.15.11: Identified key constraints at New Settlement E1 Land at Long Marston

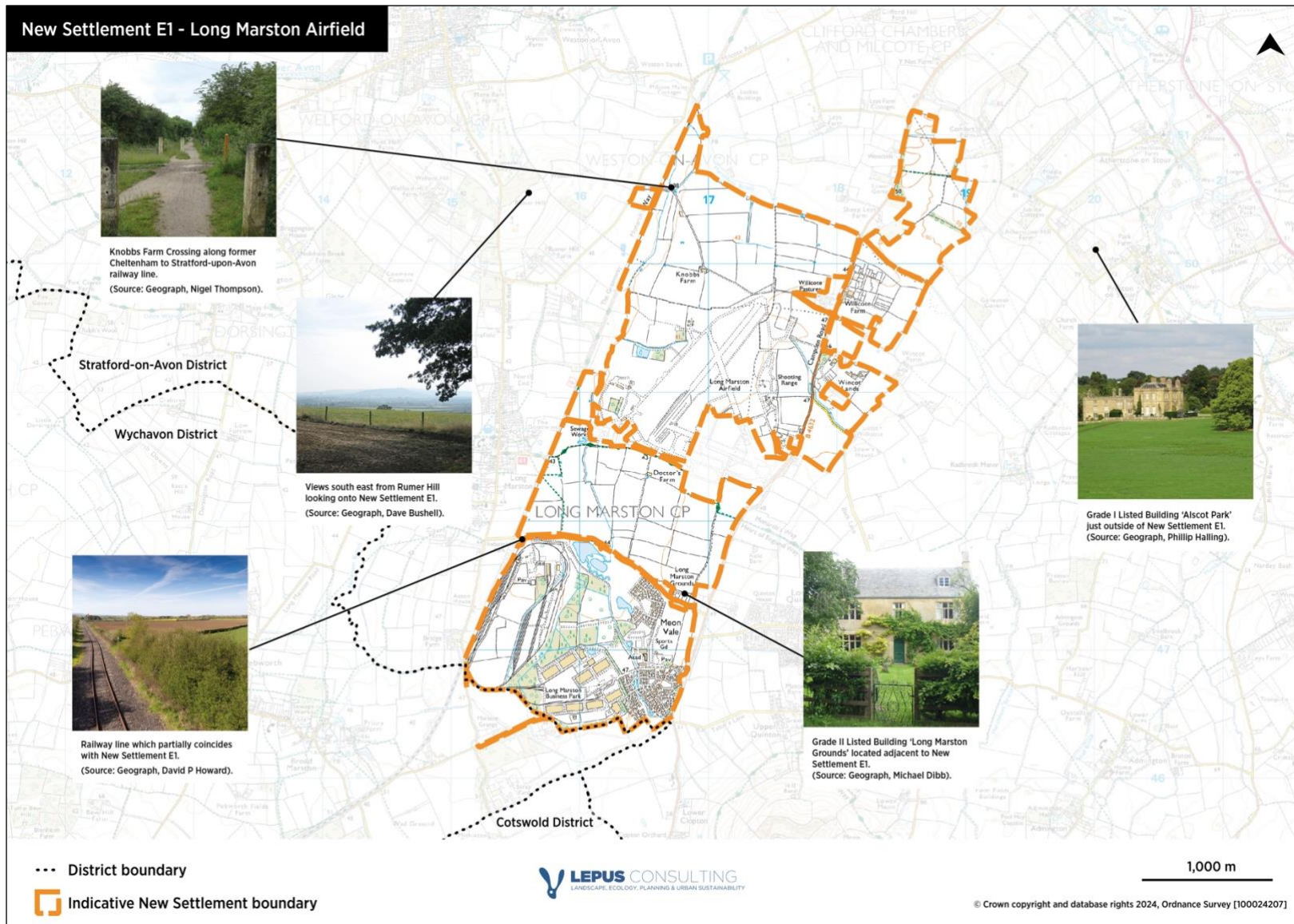


Figure C.15.12: Constraints and features at New Settlement E1 Land at Long Marston

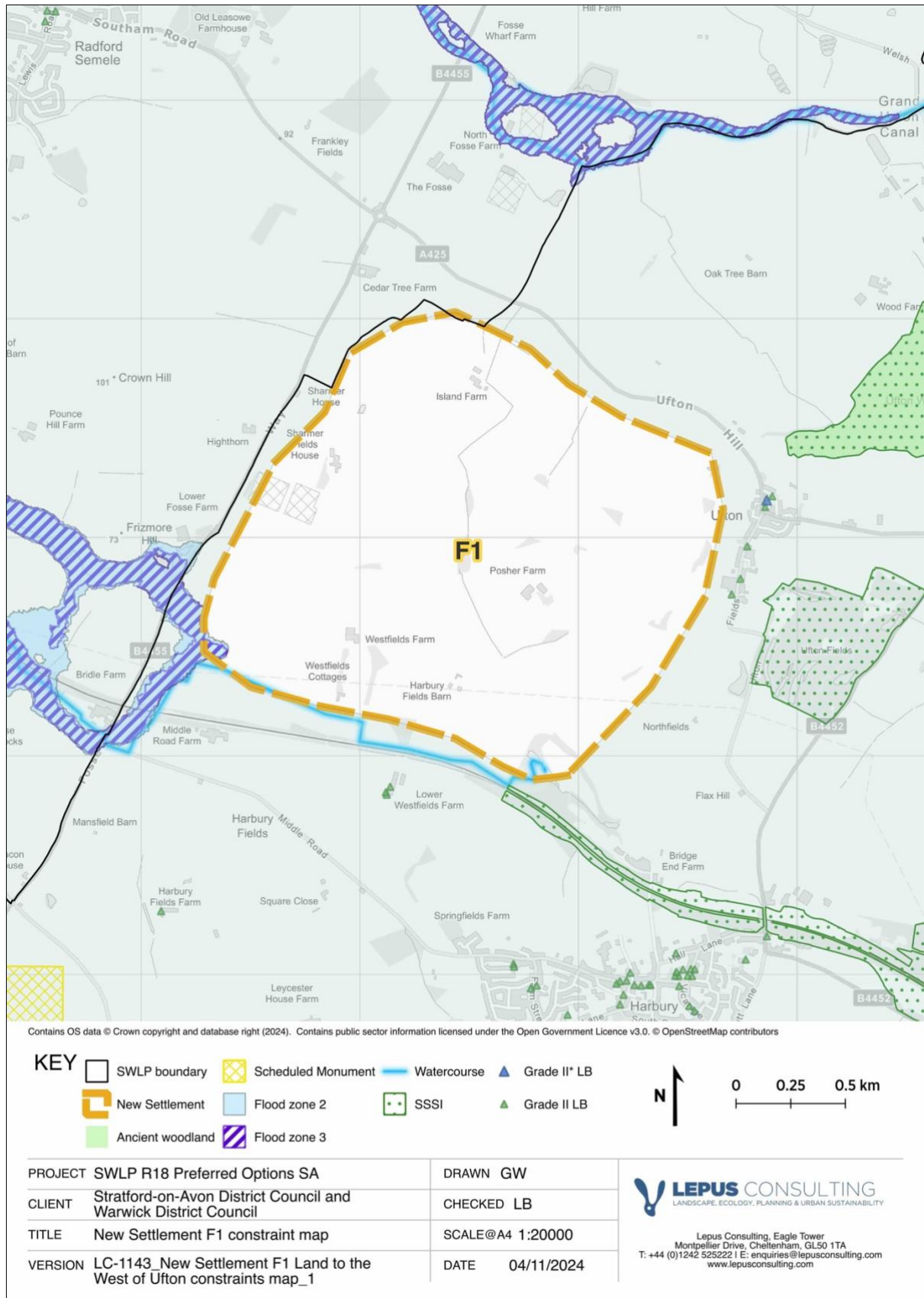


Figure C.15.13: Identified key constraints at New Settlement F1 Land to the West of Ufton

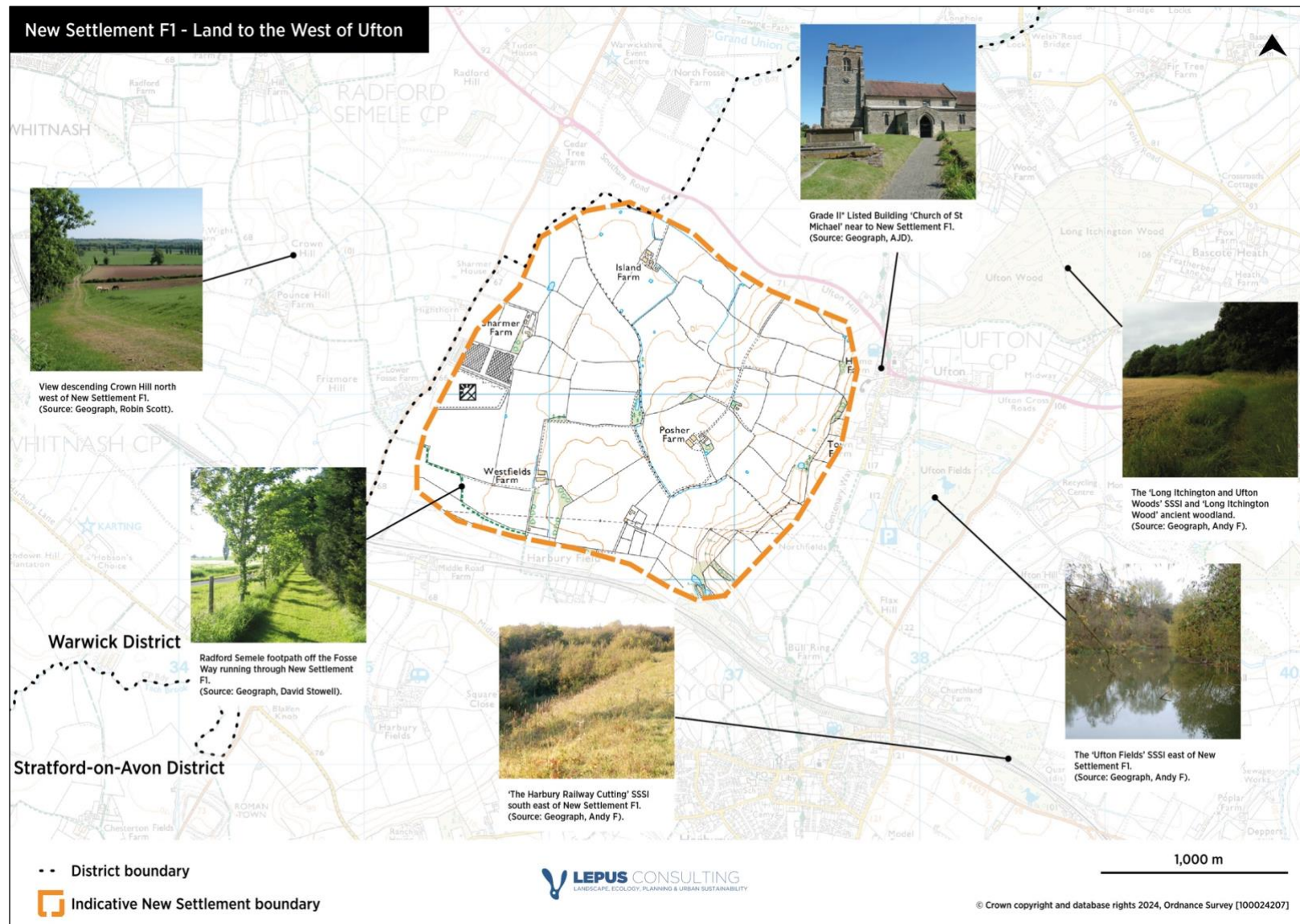


Figure C.15.14: Constraints and features at New Settlement F1 Land to the West of Ufton

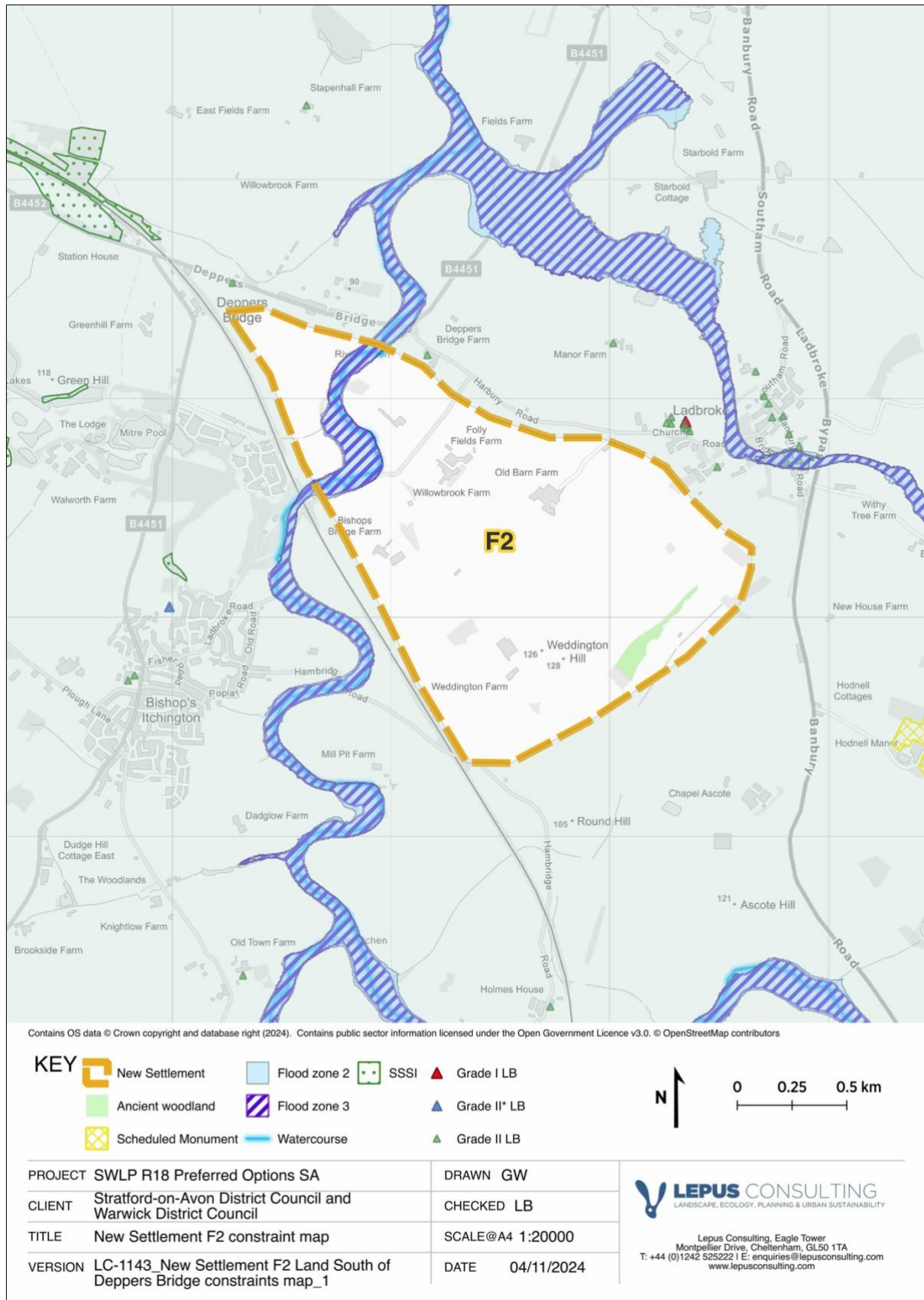


Figure C.15.15: Identified key constraints at New Settlement F2 Land South of Deppers Bridge

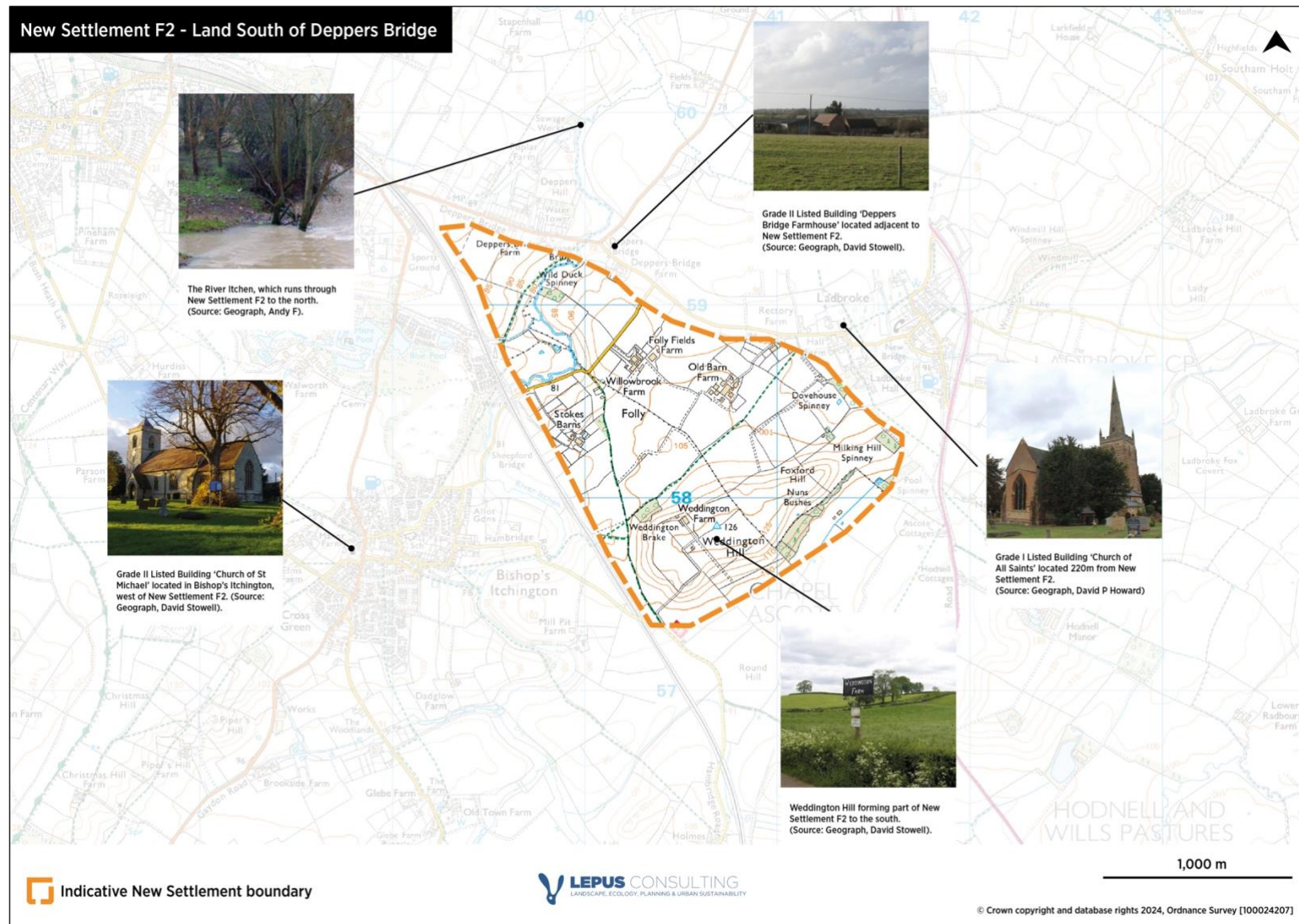


Figure C.15.16: Constraints and features at New Settlement F2 Land South of Deppers Bridge

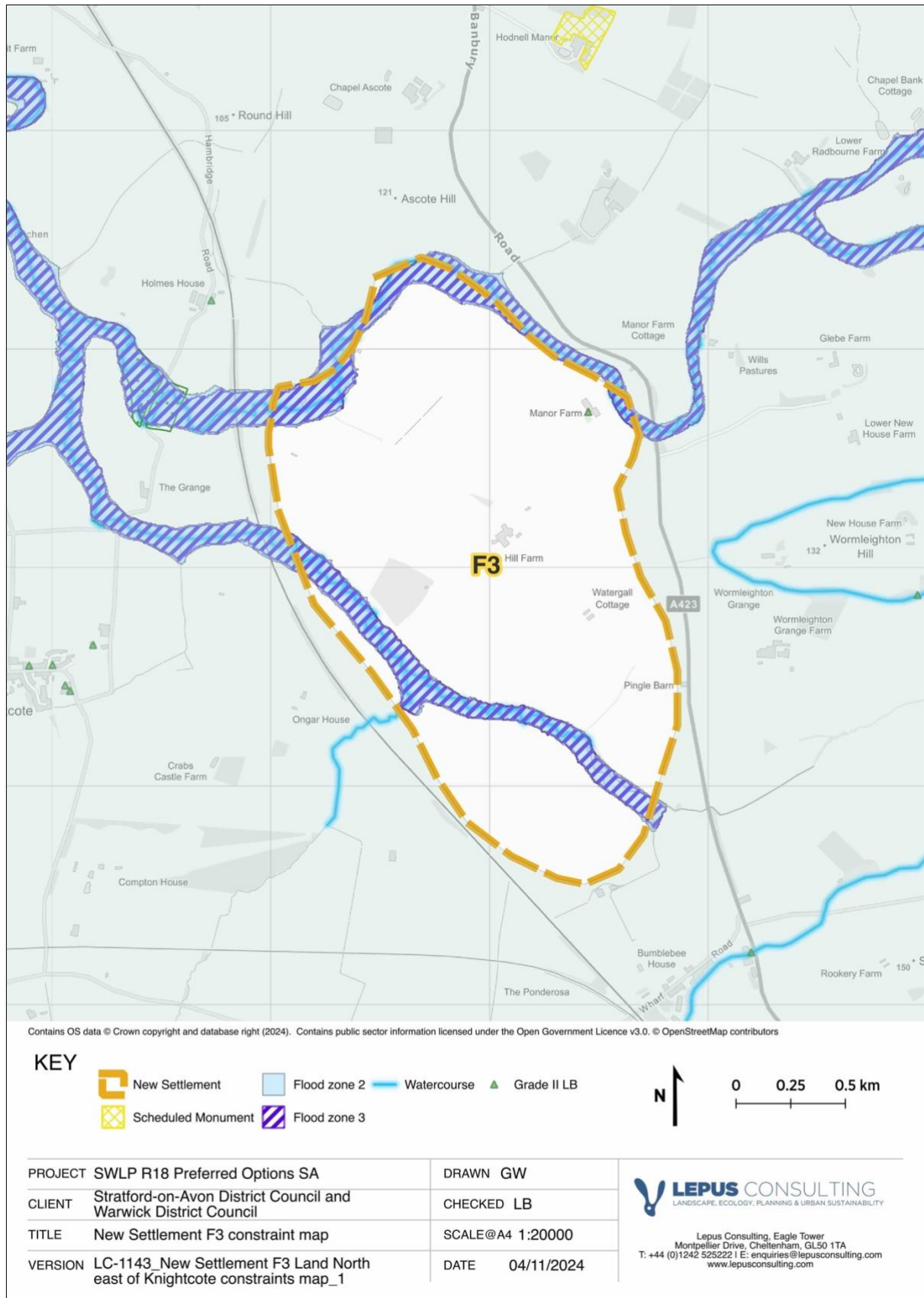


Figure C.15.17: Identified key constraints at New Settlement F3 Land North East of Knightcote

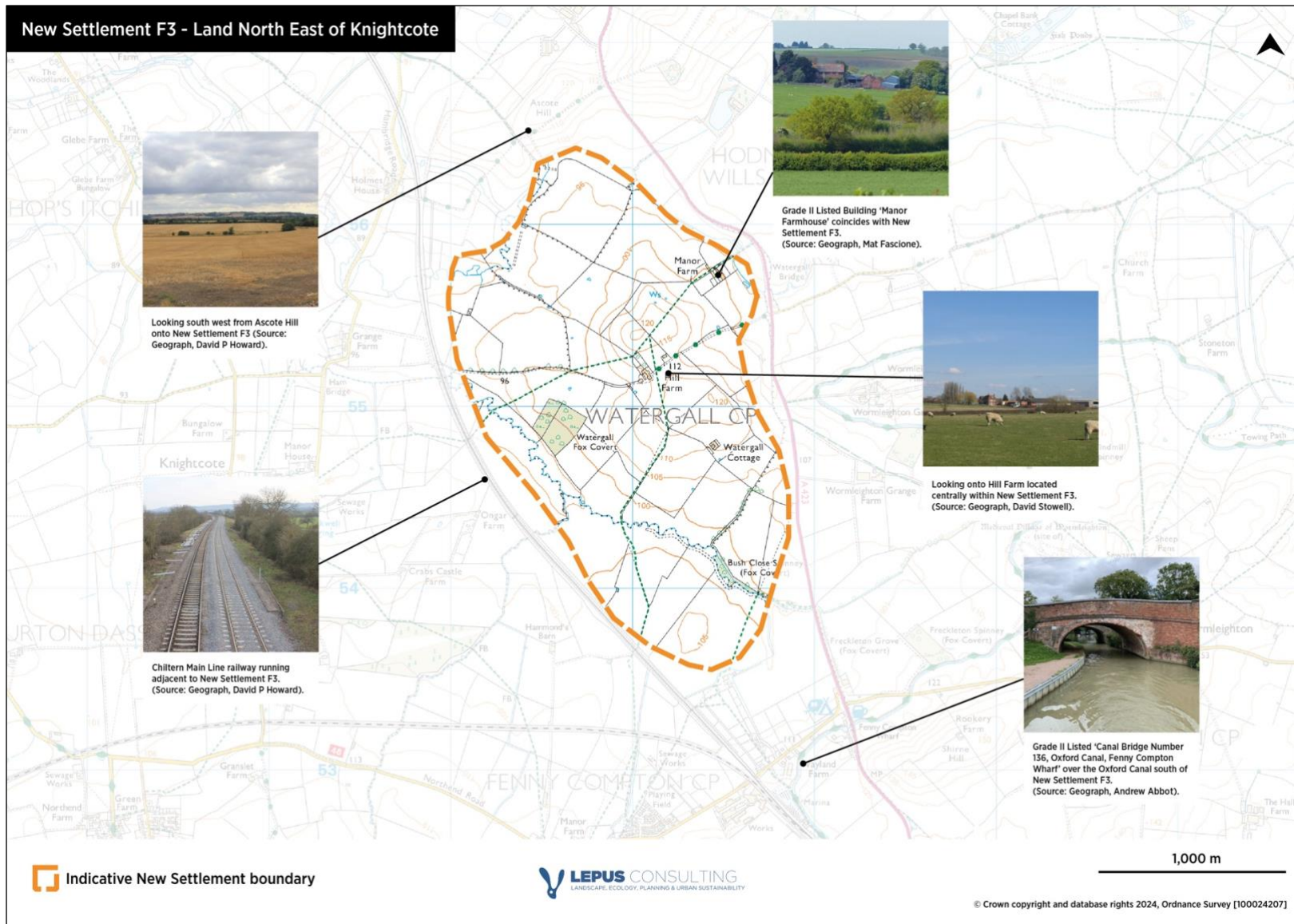


Figure C.15.18: Constraints and features at New Settlement F3 Land North East of Knightcote

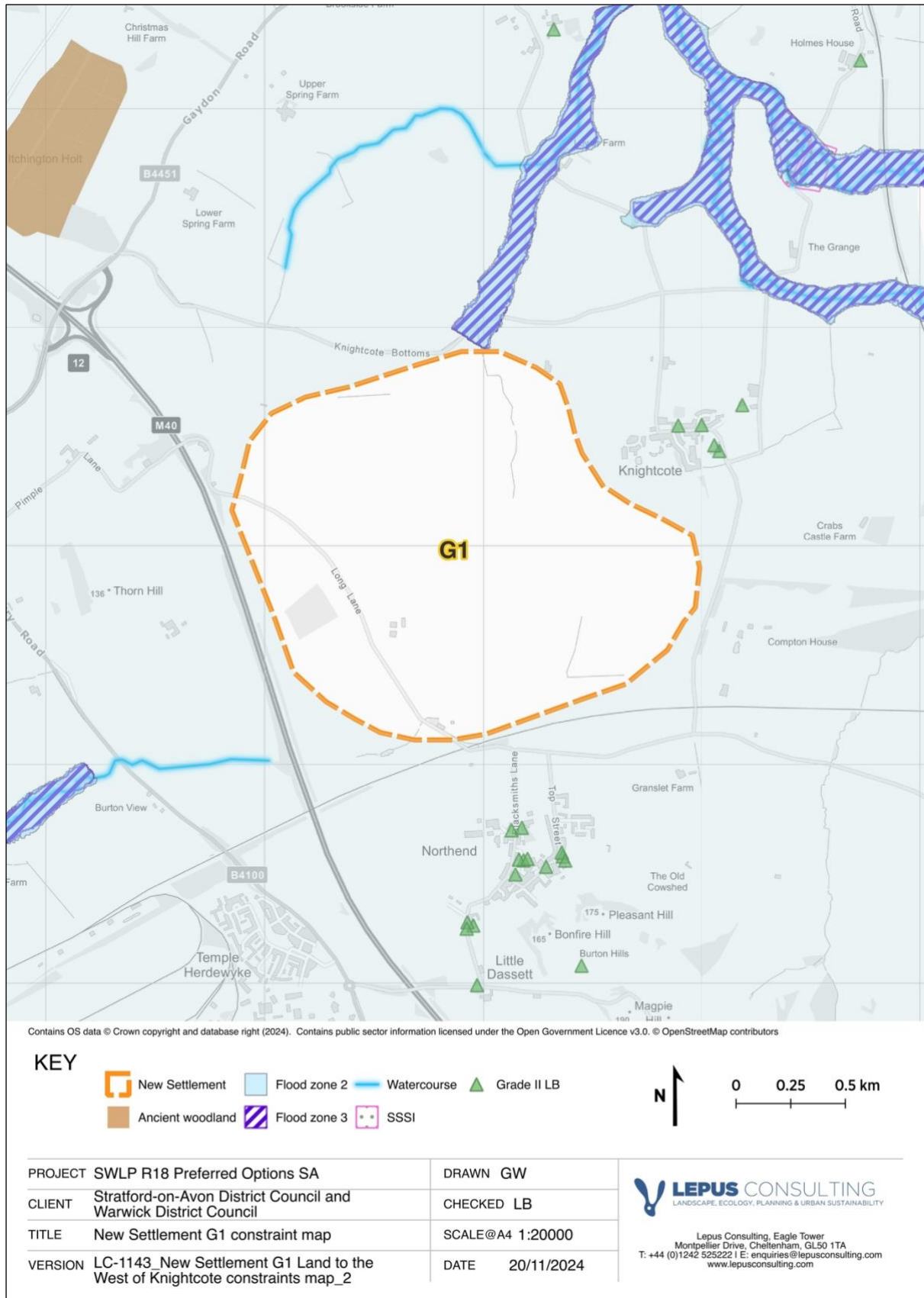


Figure C.15.19: Identified key constraints at New Settlement G1 Land to the West of Knightcote

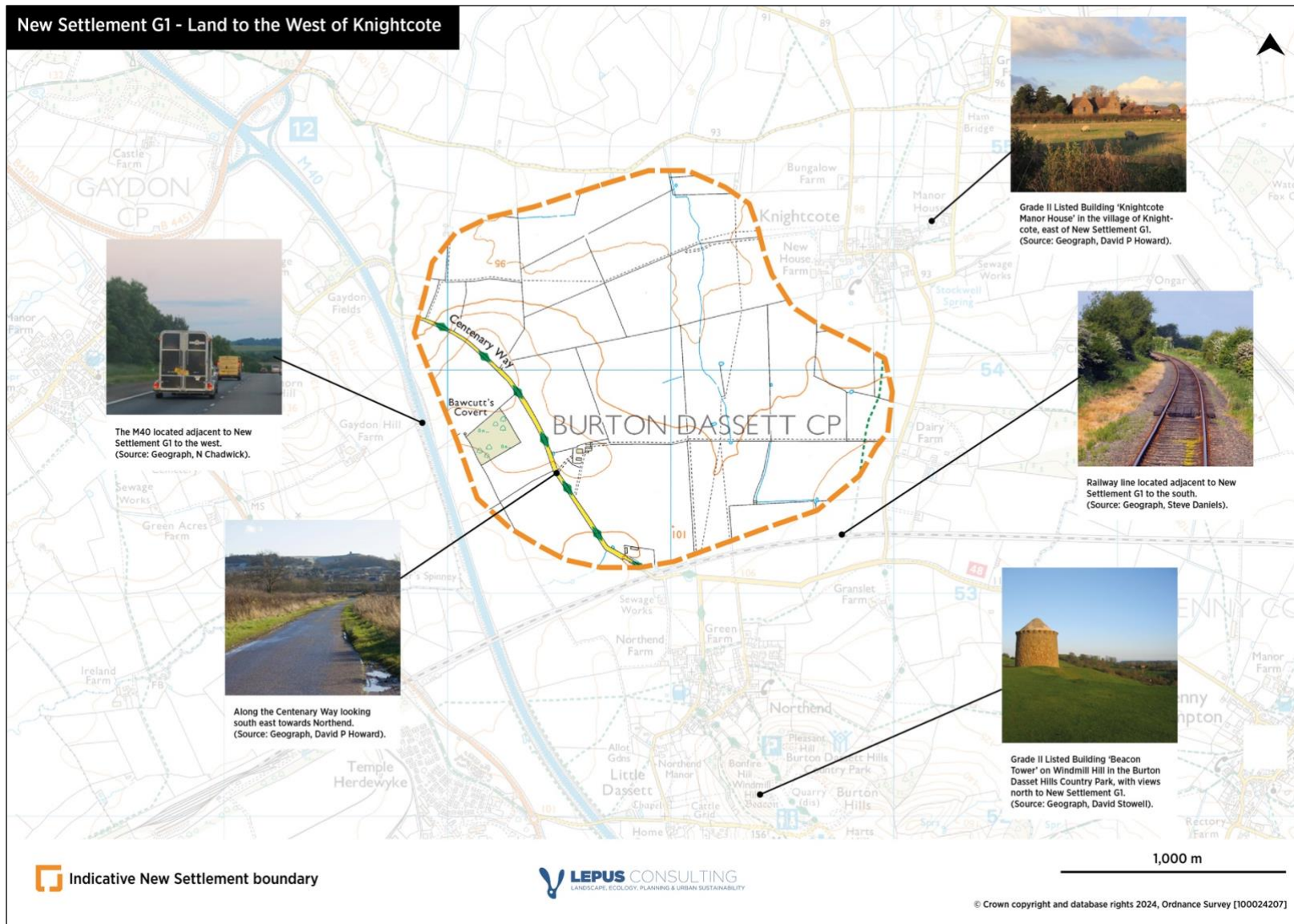


Figure C.15.20: Constraints and features at New Settlement G1 Land to the West of Knightcote

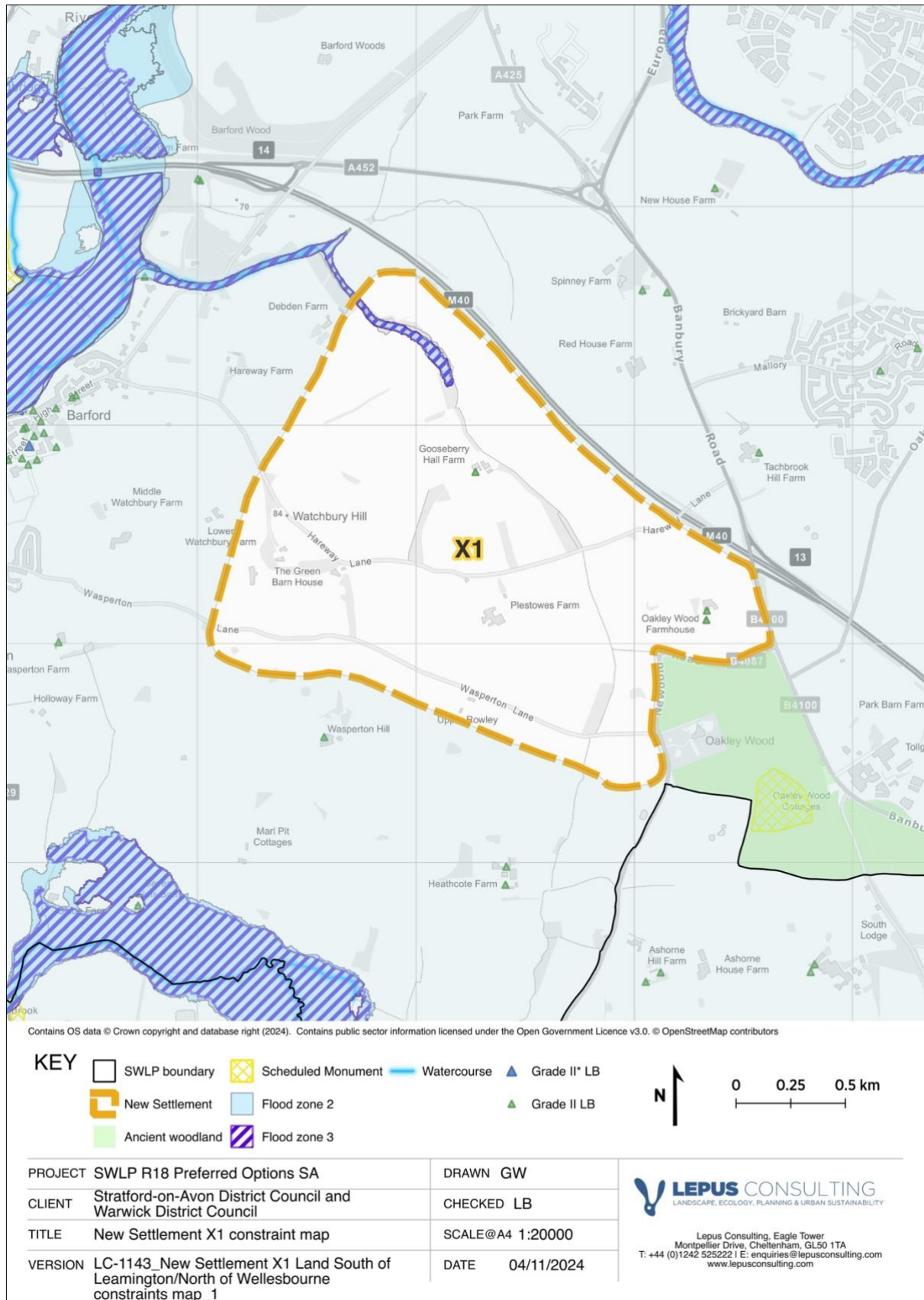


Figure C.15.21: Identified key constraints at New Settlement X1 Land South of Leamington/North of Wellesbourne/east of Barford

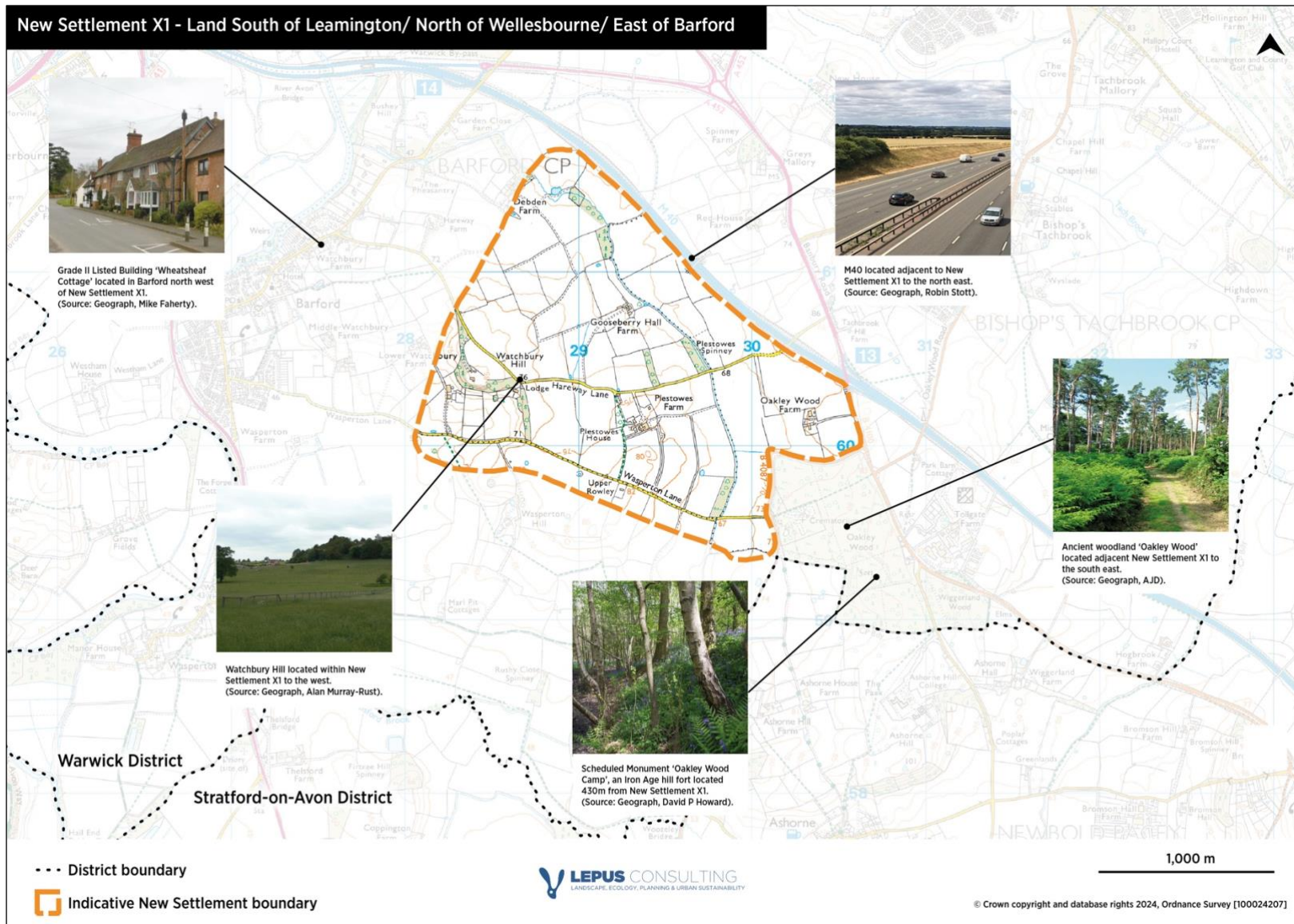


Figure C.15.22: Constraints and features at New Settlement X1 Land South of Leamington/North of Wellesbourne/east of Barford

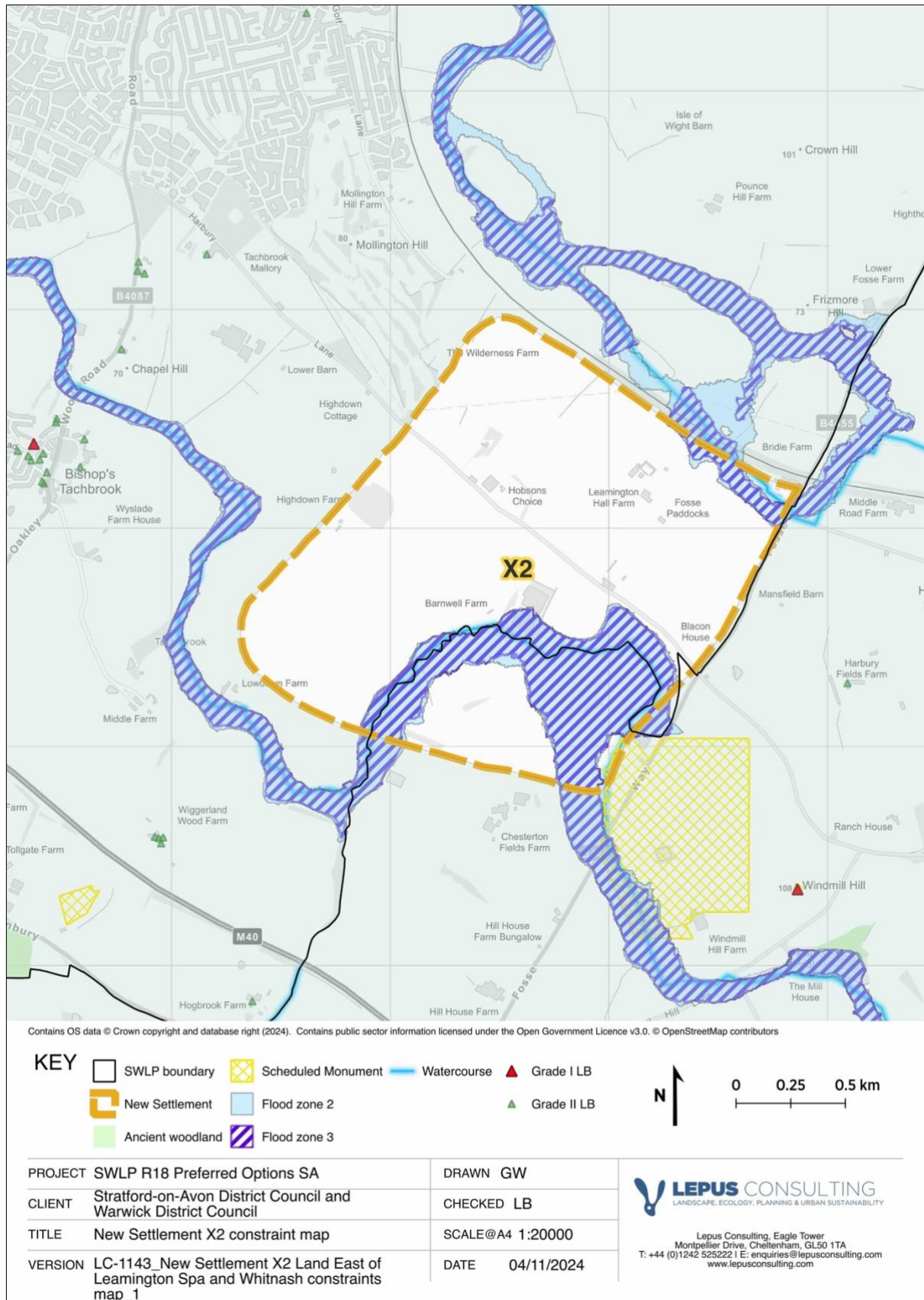


Figure C.15.23: Identified key constraints at New Settlement X2 Land East of Leamington Spa/Whitnash and west of B445 Fosse Way

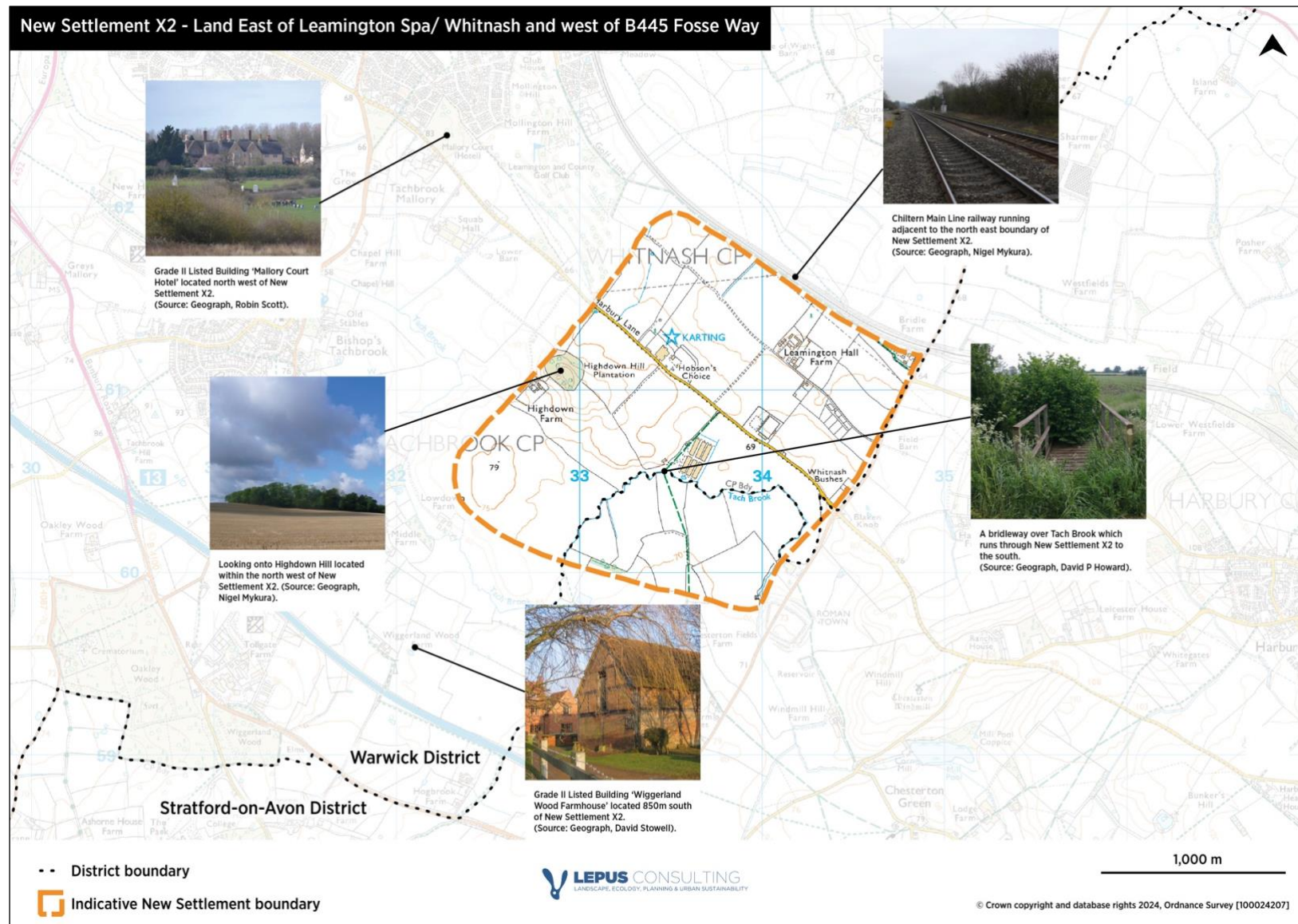


Figure C.15.24: Constraints and features at New Settlement X2 Land East of Leamington Spa/Whitnash and west of B445 Fosse Way

Appendix D: Assessment of Harbury Lane Gypsy and Traveller Site

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D.1 Introduction

D.1.1 The purpose of this appendix

- D.1.1.1 The South Warwickshire Councils have identified one reasonable alternative site at the Preferred Options consultation stage, which is being considered for Gypsy and Traveller (GT) use.
- D.1.1.2 The site has been assessed for likely impacts on each of the 13 SA Objectives of the SA Framework (see **Appendix A**), in accordance with the topic-specific methodology set out in **Chapter 2** of the main SA Report.
- D.1.1.3 The assessments have been carried out using the red line boundary and site proposal information provided by the Councils, as set out in **Table D.1.1**. The location of the site is shown in **Figure D.1.1**.
- D.1.1.4 The receptor-only impacts help to identify the potential impacts on site if there were no policy or mitigation. **Chapter 15** of this report details potential mitigation measures and recommendations which should be considered as the site progresses and any specific details become available.
- D.1.1.5 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the Councils, as well as expert judgement.

Table D.1.1: Reasonable alternative site details

Site address	Site area (ha)	Site use	Capacity
Harbury Lane, CV33 9QB	0.014	Gypsy and Traveller	Approximately 20 pitches

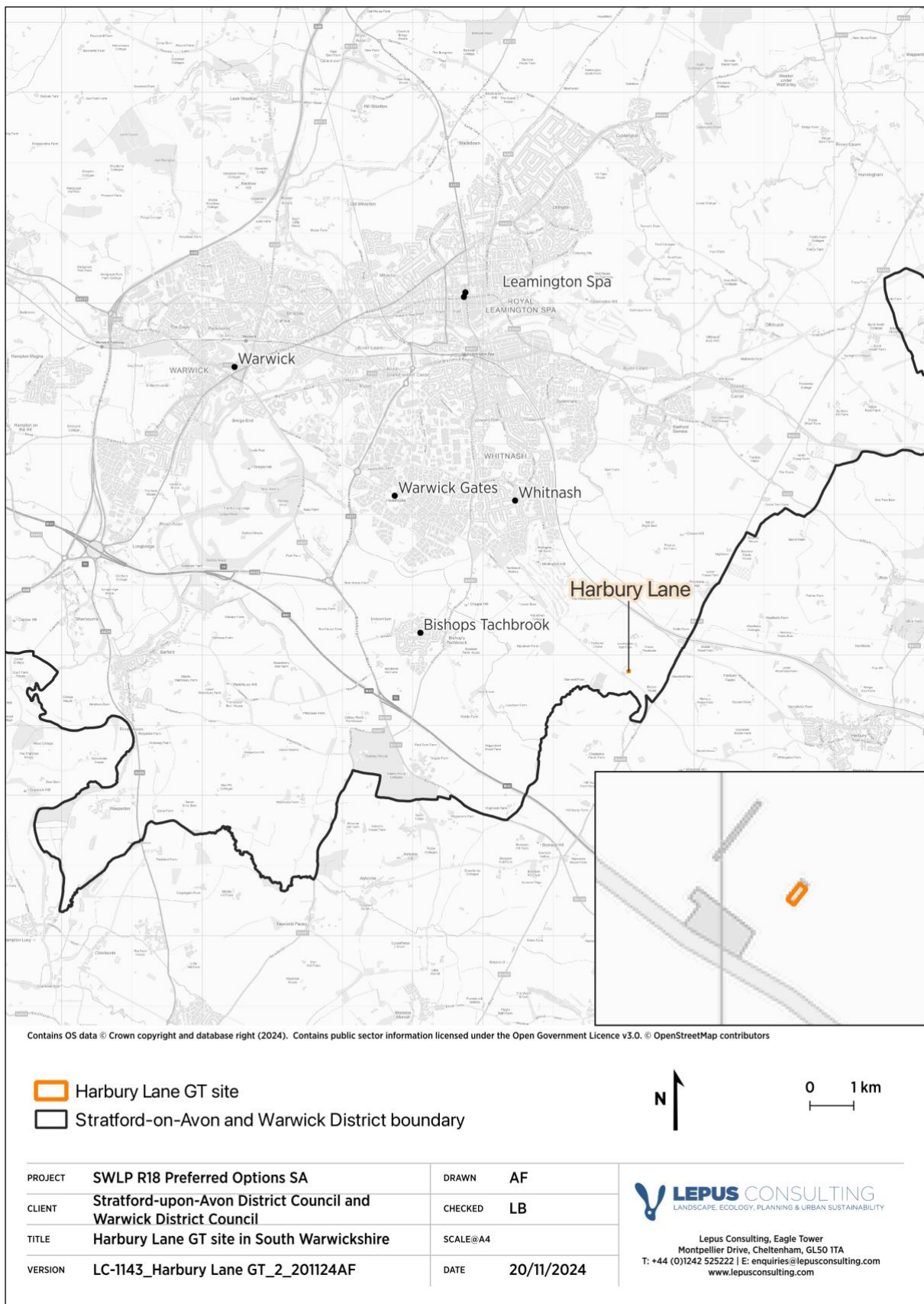


Figure D.1.1: Location of Harbury Lane Gypsy and Traveller site

D.2 SA Objective 1: Climate change

D.2.1 Potential increase in carbon footprint

D.2.1.1 The potential increase in carbon footprint and associated impact on climate change is not known. Given that details regarding the location, nature and design of the pitches are currently unspecified, along with any potential to draw from renewable or decentralised energy schemes, the site is identified as having an uncertain impact in relation to climate change.

Table B.2.1: Assessment of the Harbury Lane site against SA Objective 1 (Climate Change)

Site name	Potential increase in carbon footprint
Harbury Lane	+/-

D.3 SA Objective 2: Flood Risk

D.3.1 Riparian Flood Zones

- D.3.1.1 Riparian flood zones 2 and 3 are present within South Warwickshire along the River Avon and its tributaries including Gran Brook, Marchfront Brook, Telsford Brook and Tach Brook, among others. Flood zone 2 indicates up to a 1% annual chance of flood risk from rivers, whilst flood zone 3 indicates over a 1% chance of flood risk from rivers.
- D.3.1.2 The Harbury Lane site is anticipated to result in a minor positive impact for riparian flood zones where the site is wholly located within flood zone 1.

D.3.2 Surface Water Flood Risk

- D.3.2.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. SWFR in South Warwickshire is prevalent affecting various aspects of the Plan area including roads and pathways within the urban areas, as well as in the rural countryside locations.
- D.3.2.2 The Harbury Lane site is identified as having a minor positive impact for surface water flood risk the proposed site is not located in an area at risk of surface water flooding.

Table B.3.1: Assessment of the Harbury Lane site against SA Objective 2 (Flood Risk)

Site name	Riparian Flood Zones	Surface Water Flood Risk
Harbury Lane	+	+

D.4 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

D.4.1 European Sites

D.4.1.1 European sites are a network of areas designated for the protection of threatened habitats and species, which include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. There are no European sites located within the SWLP area, with the nearest being Bredon Hill approximately 10km south east of the Plan area, and Ensor's Pool 14km north of the Plan area. The HRA will identify impact pathways beyond these distances.

D.4.1.2 Although the proposed Gypsy and Traveller development is small scale and unlikely to result in any direct impacts on European sites, the impact of all development on European sites is uncertain at this stage, as the conclusions from the HRA process are currently unknown.

D.4.2 Sites of Special Scientific Interest

D.4.2.1 Sites of Special Scientific Interest (SSSI) are areas of land or water designated for their biodiversity and habitat value. There are 43 SSSIs located wholly or partially within South Warwickshire.

D.4.2.2 The Harbury Lane site lies wholly within the outermost ring of the IRZ associated with Harbury Railway Cutting SSSI, located 2.6km from the site, which indicates that the development at this location does not require consultation from Natural England and as such is identified as having a negligible impact on SSSIs.

D.4.3 National Nature Reserves

D.4.3.1 There are no National Nature Reserves (NNRs) present within the SWLP area, with the nearest NNRs being Foster's Green Meadow in Worcestershire, Bredon Hill in the north Cotswolds and Wychwood Forest in Oxfordshire. Development at Harbury Lane is not anticipated to result in significant adverse effects on the NNRs. Therefore, a negligible impact has been identified.

D.4.4 Ancient Woodland

D.4.4.1 South Warwickshire is heavily wooded, particularly throughout the Stratford-on-Avon District. Stands of ancient woodland are situated throughout the Plan area, predominantly in the north west of Stratford-on-Avon and the north of Warwick.

D.4.4.2 There are several parcels of ancient woodland located around Harbury Lane including Mill Pool Coppice at approximately 1.8km away and Oakley Wood at approximately 3.1km away. Given the distance of these parcels from the proposed GT site, a negligible impact has been identified where the site is not anticipated to result in any significant adverse impacts on ancient woodland.

D.4.5 Local Nature Reserves

D.4.5.1 Local Nature Reserves (LNRs) are areas designated to be managed by the local authority which support areas of value for local wildlife. There are 14 LNRs in the SWLP area.

D.4.5.2 There are several LNRs located near to Harbury Lane including Ufton Fields 3.2km away and Whitnash Brook 3.2km away. However, given the distance from Harbury Lane to these LNRs, no significant adverse effects are anticipated and as such a negligible impact has been identified for this receptor.

D.4.6 Local Wildlife Sites

D.4.6.1 Local wildlife sites (LWSs) are non-statutory biodiversity sites identified by local authorities, which seek to preserve and protect the quality of local habitats. South Warwickshire contains over 1,000 LWSs across the Plan area.

D.4.6.2 There are several LWSs located near to Harbury Lane including the Field at Fosse Farm, Mollington Hill and Harbury Railway Cutting, however these are located over 250m away from the site and are separated from the site by Leamington Football Club and Harbury Lane. As a result, a negligible impact has been identified for Harbury Lane with regard to LWSs.

D.4.7 Local Geological Sites

D.4.7.1 Local geological sites (LGSs) are non-statutory geological designations identified by local authorities to maintain the geological assets within the Plan area. A total of 89 LGSs are located within South Warwickshire.

D.4.7.2 The Harbury Lane site is not located near to any LGSs and as such is not anticipated to result in any adverse effects. A negligible impact is identified.

D.4.8 Priority Habitat

D.4.8.1 Priority habitats recognise a range of habitat types which are deemed most at threat and in need of conservation.

D.4.8.2 There are no areas of priority habitat within the Harbury Lane site boundary, and as such there are not anticipated to be any adverse effects against this receptor. However, it is worth noting that there are portions of deciduous woodland located approximately 720m from the site. Overall, a negligible impact has been identified for priority habitat.

Table B.4.1: Assessment of the Harbury Lane site against SA Objective 3 (Biodiversity)

Site name	European Sites	SSSIs	NNRs	Ancient Woodland	LNRs	LWSs	LGSs	Priority Habitats
Harbury Lane	+/-	0	0	0	0	0	0	0

D.5 SA Objective 4: Landscape

D.5.1 National Landscapes/ AONBs

- D.5.1.1 The Cotswolds National Landscape extends into the southern part of Stratford-upon-Avon District in the South Warwickshire Plan area. The Cotswolds National Landscape consists of rolling hills, arable fields and villages built from yellow limestone.
- D.5.1.2 The Harbury Lane site is located fairly centrally towards the north west of the Plan area, a significant distance of approximately 12.6km away from the Cotswolds National Landscape. As a result, a negligible impact is identified.

D.5.2 Landscape Character

- D.5.2.1 The site is not expected to result in adverse impacts on landscape character. The site is located within the Feldon Valley Character Area and 'Vale Farmlands' area of the CA. However, the site will not expect to result in adverse impacts on any of the key features of the area. As a result, a negligible impact on landscape character is identified.

D.5.3 Landscape Sensitivity

- D.5.3.1 The site is not located within a landscape sensitivity study area and therefore the potential effects of development at the site on sensitive landscapes is scored as uncertain.

D.5.4 Special Landscape Areas

- D.5.4.1 There are four Special Landscape Areas (SLAs) in South Warwickshire which include Arden, Feldon Parkland, Ironstone Hill and Cotswold Fringe.
- D.5.4.2 The Harbury Lane site is not located close to any of the SLAs, with the nearest being Feldon Parkland SLA 5.2km away. As a result of this, a negligible impact has been identified for the Harbury Lane site with regard to the SLAs.

D.5.5 Country Parks

- D.5.5.1 There are three Country Parks within the SWLP area, including Burton Dasset in the east of Stratford-on-Avon District, Newbold Comyn to the east of the city of Warwick, and Ryton Pools of which approximately one-third of the park is within the north east of Warwick District. There are not any Country Parks located near to the Harbury Lane site, and as such a negligible impact has been identified.

D.5.6 Views from the PRow Network

- D.5.6.1 The Public Rights of Way (PRow) extends across the Plan area through the urban settlements and more widely through the countryside. No national trails are located in South Warwickshire.
- D.5.6.2 Although there are two PRow located 300m and 700m from the proposed site, the views experienced by PRow users are not anticipated to alter significantly as the site already comprises a viewing stand structure as part of the football club. Therefore, a negligible impact has been identified for views from the PRow network.

D.5.7 Coalescence

D.5.7.1 Development of the small-scale Harbury Lane GT site is not anticipated to contribute to the merging of settlements and as such is not likely to harm the distinctive character of individual settlements. A negligible impact is identified for coalescence.

Table B.5.1: Assessment of the Harbury Lane site against SA Objective 4 (Landscape)

Site name	National Landscape/AONB	Landscape Character	Landscape Sensitivity	Special Landscape Areas	Country Parks	Views from the PRoW	Coalescence
Harbury Lane	0	0	+/-	0	0	0	0

D.6 SA Objective 5: Cultural Heritage

D.6.1 Grade I Listed Buildings

D.6.1.1 South Warwickshire contains 99 Grade I Listed Buildings distributed across the Plan area with higher concentrations found in the built-up areas including in Warwick, Stratford-on-Avon and Kenilworth.

D.6.1.2 The nearest Grade I Listed Building to Harbury Lane is Chesterton Windmill located 1.5km from the site. Whilst this Grade I Listed Building does have panoramic views across the Plan area, its setting is not anticipated to be adversely affected by the development of the Harbury Lane site as the site is already developed as part of Leamington Football Club. Therefore, a negligible impact has been identified.

D.6.2 Grade II* Listed Buildings

D.6.2.1 Grade II* Listed Buildings are well-distributed across SWLP area with higher concentrations in the urban centres including Warwick, Royal Leamington Spa and Stratford-on-Avon, with 268 in total.

D.6.2.2 There are not any Grade II* Listed Buildings located near to the Harbury Lane GT site and as such no adverse effects are anticipated. A negligible impact has been identified.

D.6.3 Grade II Listed Buildings

D.6.3.1 There are 4,804 Grade II Listed Buildings in the South Warwickshire Plan area, with higher concentrations found within the built-up areas, particularly in Warwick, Kenilworth, Royal Leamington Spa, Stratford-on-Avon and Alcester, as well as in rural settlements.

D.6.3.2 The nearest Grade II Listed Building is 'Harbury Fields Farmhouse' which is located approximately 1.1km away from the proposed GT site. Given the distance between the listed building and the proposed GT site, as well as the intervening development at the adjacent Harbury Fields Farm Caravan Park, and the previously developed nature of the GT site, a negligible impact on the setting of the listed building has been identified.

D.6.4 Registered Parks and Gardens

D.6.4.1 Registered parks and gardens (RPGs) are distributed across the South Warwickshire Plan area, with a higher concentration in Warwick district. The closest RPG to Harbury Lane is Mallory Court at approximately 2.3km away. Given the distance from the RPG and the small size of the site, no adverse effects are anticipated on RPGs with a negligible impact identified.

D.6.5 Conservation Area

D.6.5.1 Conservation Areas (CAs) are areas of special architectural or historic interest which contain many listed buildings and scheduled monuments. These are primarily concentrated in the northern part of the SWLP area, within Warwick District.

D.6.5.2 The nearest CA to the Harbury Lane GT site is Bishop’s Tachbrook CA which is approximately 2.5km away. Due to this distance, the site is not anticipated to result in any significant adverse effects on CAs, with a negligible impact identified.

D.6.6 Scheduled Monument

D.6.6.1 Scheduled monuments (SMs) recognise nationally important archaeological sites. There are 128 SMs in and around the Plan area. The ‘Roman Rural Settlement at Windmill Hill Farm’ is the nearest SM to the Harbury Lane GT site located 740m away. As a result of the distance from this SM and the previously developed nature of the proposed GT site, there are not anticipated to be any adverse effects on SMs, with a negligible impact identified overall.

Table B.6.1: Assessment of the Harbury Lane site against SA Objective 5 (Cultural Heritage)

Site name	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Registered Parks and Gardens	Conservation Areas	Scheduled Monument
Harbury Lane	0	0	0	0	0	0

D.7 SA Objective 6: Pollution

D.7.1 Air Quality Management Areas

- D.7.1.1 There are four Air Quality Management Areas (AQMAs) located in the SWLP area: Warwick, Jury Street AQMA, Leamington AQMA, Studley AQMA and Stratford-upon-Avon AQMA. In addition, Coventry AQMA lies adjacent to the north of the Plan area. Excess emissions are already present in these areas, where air quality objectives are unlikely to be met and require further management and monitoring. Situating development within 200m of an AQMA is likely to contribute to an increase in emissions in the designation, such as through increased vehicular usage, congestion and urban form. Exposure for site end users to sources of air pollution is higher in these areas.
- D.7.1.2 The Harbury Lane site is not located within 200m, or anywhere close to an AQMA, and as such is not anticipated to contribute to the worsening of air quality within these hot spots. Therefore, a negligible impact has been identified.

D.7.2 Main Road

- D.7.2.1 The SWLP area contains a number of major roads, the most notable being the M40 running from the north west to south east. Where a site is located within 200m of a main road (motorway or A Road), this is expected to increase pollution and expose site end users in these areas to higher levels of transport associated air and noise pollution.
- D.7.2.2 The Harbury Lane site is located in a rural part of the Plan area to the south east of Leamington Spa. The M40 is located 2.2km to the south of the site and the A425 is located 3.3km to the north of the site. As the proposed GT site is not located in, or close to, the 200m buffer for these thoroughfares it is not anticipated to result in any adverse impacts for main roads. A negligible impact has been identified.

D.7.3 Railway Line

- D.7.3.1 Several railway lines run through South Warwickshire connecting the Plan area south to London and the Cotswolds, as well as north to Birmingham, Leicester and beyond. Where new development lies within 200m of a railway line, these are expected to experience high levels of noise pollution and vibrations. There is a railway line located approximately 790m to the north of the Harbury Lane site, however this is located significantly over 200m from the railway and as such is not anticipated to result in significant adverse effects. As such, a negligible impact has been identified.

D.7.4 Groundwater Source Protection Zone

- D.7.4.1 Groundwater Source Protection Zones (SPZs) have been identified to indicate where sources of drinking water may be most at risk to sources of contamination. South Warwickshire contains several SPZs ranging from SPZ1 to SPZ3.
- D.7.4.2 There are not any SPZs located close to the Harbury Lane GT site and as such no adverse effects on SPZs are expected. A negligible impact has been identified for this receptor.

D.7.5 Watercourses

D.7.5.1 Several watercourses run through South Warwickshire including the River Avon, River Arrow, River Leam, River Stour and their tributaries. Where a development site is located within 200m of a watercourse, impacts are likely upon water pollution, including downstream water quality.

D.7.5.2 There are no watercourses located within 200m of the Harbury Lane GT site, and as such, a negligible impact has been identified for this receptor. However, each development site would need to be evaluated according to land use type, size of development and exact location. New development has the potential to lead to adverse impacts such as those resulting from runoff at a greater distance than 200m considered in the assessment.

Table B.7.1: Assessment of the Harbury Lane site against SA Objective 6 (Pollution)

Site name	AQMA	Main Road	Railway Line	Groundwater SPZs	Watercourses
Harbury Lane	0	0	0	0	0

D.8 SA Objective 7: Natural Resources

D.8.1 Best and most versatile land

D.8.1.1 The SWLP area primarily comprises Grade 3 soil according to the Agricultural Land Classification (ALC), with smaller areas of Grade 2 and Grade 4 soil being distributed throughout the Plan area. Soil of Grades 1, 2 and Subgrade 3a are considered to be the 'Best and Most Versatile' (BMV) soils, which have the highest versatility and suitability for growing crops, as well as contributing to ecosystem services. It is unknown whether the land consisting of Grade 3 soil in South Warwickshire falls into Subgrade 3a or 3b; therefore, a precautionary approach has been taken and potential BMV land has been assessed as Grades 1, 2 and 3.

D.8.1.2 The Harbury Lane site comprises brownfield land, currently containing a viewing stand structure associated with Leamington Football Club. As such, the proposed development for GT pitches will have a negligible impact on BMV land.

D.8.2 Mineral Safeguarding Areas

D.8.2.1 Sterilisation of mineral resources can occur where development is situated on, or close to, the boundary of a resource. Using data supplied by the British Geological Survey, Warwickshire County Council has mapped Mineral Safeguarding Areas (MSA) in the county which encompasses the entirety of the Plan area¹. The SWLP area primarily contains resources for unconsolidated sand and gravel, building stone, areas of brick clay in Warwick District, and raw cement in Stratford-on-Avon District where small areas of crushed rock also exist in the south and southeastern border.

D.8.2.2 The Harbury Lane site coincides with an MSA for unconsolidated sand and gravel, building stone and cement raw material. However, the site comprises previously developed land associated with the adjacent football club site where it is unlikely there is any potential for mineral extraction. As such, development at this site has the potential to result in a negligible impact on minerals.

Table B.8.1: Assessment of the Harbury Lane site against SA Objective 7 (Natural Resources)

Site name	BMV land	MSAs
Harbury Lane	0	0

¹ Warwickshire County Council (2024) Minerals Local Plan Map. Available at: <https://www.warwickshire.gov.uk/minerals-local-plan-1> (Date accessed: 30/10/24]

D.9 SA Objective 8: Waste

D.9.1 Potential increase in household waste generation

D.9.1.1 Residential-led development is likely to result in an increase in household waste generation. However, given the limited information for the Harbury Lane GT site and that details regarding the location, number of residents and nature/design of the pitches are currently unspecified an uncertain score has been identified.

Table B.9.1: Assessment of the Harbury Lane site against SA Objective 8 (Waste)

Site name	Potential increase in household waste generation
Harbury Lane	+/-

D.10 SA Objective 9: Housing

D.10.1 Housing provision

D.10.1.1 The Harbury Lane GT site is expected to provide approximately 20 pitches to meet the GT need in the SWLP area. As a result, the proposed development is anticipated to lead to a minor positive impact on housing provision.

Table B.10.1: Assessment of the Harbury Lane site against SA Objective 9 (Housing)

Site name	Housing provision
Harbury Lane	+

D.11 SA Objective 10: Health

D.11.1 Access to NHS hospitals with Accident & Emergency department

D.11.1.1 Warwick Hospital is located in the centre of Warwick and provides an accident and emergency (A&E) department. Other nearby hospitals with A&E departments include Alexandra Hospital, situated 300m west of the Stratford-on-Avon District boundary, Horton General Hospital situated 5.5km south east of the Stratford-on-Avon boundary, and University Hospital Coventry located 5.1km north of the Warwick District boundary.

D.11.1.2 The Harbury Lane site is located over 5km from an NHS hospital with an A&E department, with Warwick Hospital being the closest at 7.5km to the north west of the site. As such, a minor negative impact has been identified for access to emergency healthcare.

D.11.2 Access to GP surgery

D.11.2.1 There are 40 GP surgeries with the SWLP area, largely located in the Leamington Spa urban area, whereas the rest are more sparsely located across Warwick, Stratford-upon-Avon and the rural settlements.

D.11.2.2 The Harbury Lane site is located over 800m from a GP surgery, with the nearest being Whitnash Medical Centre 2.5km away. As a result, a minor negative impact has been identified for sustainable access to GP surgeries.

D.11.3 Access to leisure facilities

D.11.3.1 There are a total of 10 council-owned leisure centres located in the SWLP area, including Meadow Community Sports Centre and newly commissioned facilities at Castle Park in Kenilworth, Newbold Comyn Leisure Centre in Leamington Spa, and St Nicholas Park Leisure Centre in Warwick. The remaining six leisure centres are spread throughout the Stratford-on-Avon District, including Stratford Leisure Centre located in the town centre of Stratford-upon-Avon.

D.11.3.2 The Harbury Lane site is located over 800m from a leisure facility, with the nearest being Newbold Comyn Leisure Centre 5.3km away. Given the distance of the Harbury Lane GT site from any leisure facilities, a minor negative impact has been identified for this receptor.

D.11.4 Access to greenspace

D.11.4.1 Greenspaces are distributed throughout the SWLP area, where these are more densely located within the urban areas of Stratford-upon-Avon, Warwick and Leamington Spa. These include parks, allotments, playing fields and sports facilities.

D.11.4.2 The Harbury Lane site is located over 800m from public greenspace with the nearest being 1.7km away. A minor negative impact has been identified in relation to access to greenspace.

D.11.5 Access to PRow / cycle path

D.11.5.1 Access to Public Rights of Way (PRow) and cycle routes provide site end users with good pedestrian and cycle access to local facilities, as well as encouraging sustainable and active forms of travel. Several PRow are located within 600m of the Harbury Lane site. As such, a minor positive impact has been identified. However, it is worth noting that pedestrian access connecting directly to the site is currently limited.

Table B.11.1: Assessment of the Harbury Lane site against SA Objective 10 (Health)

Site name	NHS hospital	GP surgery	Leisure facilities	Greenspace	PRow/cycle
Harbury Lane	-	-	-	-	+

D.12 SA Objective 11: Accessibility

D.12.1 Proximity to bus stop

- D.12.1.1 Regular bus services are primarily found in the urban areas of Warwick, Leamington Spa and Stratford-upon-Avon, whereas bus stops providing less frequent services are situated more sparsely throughout the rural settlements.
- D.12.1.2 There is a bus stop located on Harbury Lane Road directly outside of the site boundary, which provides access into Leamington Spa. This situates the site wholly within the 400m buffer distance of a bus stop; a minor positive impact is therefore identified.

D.12.2 Proximity to railway station

- D.12.2.1 Several main line railway stations are located in the SWLP area, including Stratford-upon-Avon Station and Warwick Station. However, given the rural location of the Harbury Lane GT site, the nearest railway station is Leamington Spa 5km to the north. As a result, the Harbury Lane site is located beyond the 2km buffer distance of a railway station and a minor negative impact has been identified.

D.12.3 Food stores

- D.12.3.1 Food stores are predominately located within the urban areas of Warwick, Leamington Spa and Stratford-upon-Avon, whereas a number of local services and stores are more sparsely found throughout the rural settlements. Given the rural location of the Harbury Lane GT site, the nearest food store is located in Whitnash, approximately 3.3km away. Therefore, a minor negative impact has been identified for sustainable access to food stores.

D.12.4 Connectivity

- D.12.4.1 Connectivity has been assessed against the 'South Warwickshire Settlement Analysis'² which measures the presence of active travel and existing road network links surrounding settlement boundaries, and any barriers to movement in these locations. Connectivity has been ranked on a scale of A-E, with Grade A representing excellent connectivity, and Grade E representing very poor connectivity.
- D.12.4.2 The Harbury Lane GT site is in an area that is not covered by the connectivity maps produced for the settlement analysis, and as such its connectivity is uncertain at this stage.

D.12.5 Accessibility

- D.12.5.1 Accessibility has been assessed using priority areas, which have been identified by the Councils within South Warwickshire to determine which areas are best located in terms of sustainable transport links and economic growth. Priority areas have been categorised on a scale of 1-3, with Priority Area 1 being those with the strongest access links, and Priority Area 3 being those with moderate access links.

² South Warwickshire Councils (2022) 'South Warwickshire Settlement Analysis'

D.12.5.2 The Harbury Lane GT site is located wholly within Priority Area 3 and as such has some limited access to transport links and local amenities. Therefore, a negligible impact has been identified for this receptor.

Table B.12.1: Assessment of the Harbury Lane site against SA Objective 11 (Accessibility)

Site name	Bus stop	Railway station	Food stores	Connectivity	Accessibility
Harbury Lane	-	-	-	+/-	0

D.13 SA Objective 12: Education

D.13.1 Access to primary school

D.13.1.1 There are a total of 104 primary schools in South Warwickshire. The Harbury Lane site is located outside of the sustainable 800m distance to a primary school, with the nearest primary school being Bishop’s Tachbrook C of E Primary School 3.2km away from the site. As a result, a minor negative impact has been identified in relation to sustainable access to primary schools.

D.13.2 Access to secondary school

D.13.2.1 There are a total of 23 secondary schools in South Warwickshire. The Harbury Lane site is located outside of the sustainable 1.5km distance from a secondary school, with the nearest being Oakley School 2.7km away. As such, a minor negative impact has been identified for sustainable access to secondary schools.

D.13.3 Access to further education

D.13.3.1 The law now requires 16–18-year-olds to remain in full-time education or training which can include sixth forms and colleges. According to data provided by the Councils, there are a total of 20 such educational facilities in South Warwickshire. The Harbury Lane site is located within the 800m sustainable distance to Champion School and as such a minor positive impact is identified for access to further education.

Table B.13.1: Assessment of the Harbury Lane site against SA Objective 12 (Education)

Site name	Primary school	Secondary school	Further education
Harbury Lane	-	-	+

D.14 SA Objective 13: Economy

D.14.1 Sustainable access to employment opportunities

D.14.1.1 The SWLP area provides a range of employment opportunities, with a large number located in the urban areas of Warwick and Leamington Spa and a number of smaller sites in proximity to rural settlements. A total of 46 mapped key employment locations have been provided by the Councils. A 5km target distance has been used to consider whether the site is located within a sustainable distance of existing employment location.

D.14.1.2 The Harbury Lane site is located within 5km of Alathorpe Industrial Estate, Tachbrook Park and Spa Park, Heathcote Industrial Estate, Sydenham Industrial Estate and Queensway Leamington Spa and is expected to provide employment opportunities to the residents at the site. As such, a minor positive impact has been identified for access to employment opportunities.

D.14.2 Employment floorspace provision

D.14.2.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at the site. The Harbury Lane site does not form current employment land and is proposed for residential use for Gypsy and Traveller communities. Therefore, a negligible impact is expected where the site is not expected to result in a change in employment floorspace.

Table B.14.1: Assessment of the Harbury Lane site against SA Objective 13 (Economy)

Site name	Access to employment opportunities	Employment floorspace provision
Harbury Lane	+	0

D.15 Mitigation and recommendations

- D.15.1.1 The South Warwickshire Councils should ensure that the development proposal for the Harbury Lane GT site provides details regarding the design and layout of the site and be considered with reference to good practice guidance³. Through the integration of appropriate landscaping and green infrastructure (GI), the site will be more equipped to deal with the impacts of climate change, including potential for increased risk of flooding and rising temperatures.
- D.15.1.2 The site is currently paved over owing to its current use for the viewing stand associated with Leamington Football Club. The GT site should ensure there is appropriate sustainable drainage systems in place and where possible provide surfaces which will be more permeable to heavy rainfall and surface water and improve resilience to climate change.
- D.15.1.3 Although the site is not expected to result in any significant adverse impacts on biodiversity, landscape or cultural heritage, the design and layout of the site should still seek to integrate habitats through the provision of biodiversity net gain (BNG) and GI. The design of the site, including form and permeability, should be appropriate to the surrounding landscape and topography, whilst ensuring long-reaching views from landscape features or heritage assets are not adversely impacted.
- D.15.1.4 More specific detail could also be provided regarding the potential for the use of renewable and decentralised forms of energy, such as the incorporation of solar panels, to provide electricity for site end users and for any potential service and amenity blocks. These measures will support energy and resource efficiency.
- D.15.1.5 Whilst more negative impacts have been identified for the GT site in relation to health, education and accessibility, many of these impacts have potential to be mitigated through the provision of sustainable transport options. The Councils should ensure the bus stop on Harbury Lane Road outside of the site remains in frequent use, with regular services stopping to ensure the residents at the Harbury Lane GT site have sustainable transport options to access to healthcare facilities, railway stations, food stores, schools, leisure facilities and employment locations.

³ Communities and Local Government (2008) Designing Gypsy and Traveller Sites: Good Practice Guide. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf
[Date accessed: 18/11/24]

Appendix E: Assessment of draft policies and policy directions

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E.1 Introduction

E.1.1 The purpose of this appendix

- E.1.1.1 The South Warwickshire Councils have drafted a range of draft policies and ‘policy directions’ for consideration, as part of the Preferred Options consultation for the emerging South Warwickshire Local Plan (SWLP).
- E.1.1.2 Draft policies and draft policy directions, have been identified by the Councils to cover a range of topics including those which will address the amount, type and location of new development to meet the needs of local residents over the Plan period, tackling climate change, ensuring high quality design principles, improving accessibility and conserving the natural environment.
- E.1.1.3 This appendix provides an assessment of 11 policies where the wording has been fully drafted, and 49 policy directions (one of which has been split into five parts, giving a total of 53 policy direction assessments within this appendix), which indicate the broad area to be covered by a policy that will be fully developed at the next plan making stage. The Councils have also drafted a ‘Vision’ and ‘Strategic Objectives’ for the emerging SWLP, which have also been evaluated within this document.
- E.1.1.4 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix A**) and is in accordance with the methodology as set out in the SA Main Report.
- E.1.1.5 The assessments within this appendix are based on the policy wording as presented in the SWLP Preferred Options Consultation document, based on the draft ‘version 6’ provided by the Councils on 18th December 2024. It should be noted that there may be minor wording or formatting changes to the policies compared to that within the Preferred Options consultation version of the SWLP.
- E.1.1.6 Recommendations have been identified where relevant to improve the sustainability of the policies / policy directions as they continue to be shaped and developed. These recommendations are also summarised in **Chapter 9** of the main SA Report (see **Volume 1**).
- E.1.1.7 A summary of the SA findings is presented in **Table E.1.1**.

Table E.1.1: Summary SA assessments for the draft policies and policy directions

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy or Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Transport	Education	Economy
PD 1	-	+/-	-	--	+/-	-	--	-	++	+/-	+	+/-	++
PD 2	-	+/-	+/-	+/-	+/-	-	--	-	++	++	++	++	++
PD 3	+	0	0	0	0	+	+	0	+	0	+	0	0
PD 4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-	+/-
PD 5	+	+	+	0	0	+	+	+	0	+	++	+	+
PD 6	+	0	0	0	0	+	0	0	0	+	++	0	0
PD 7	0	0	0	+	0	0	0	0	+	0	0	0	+
PD 8	0	0	0	0	0	0	+	0	+	0	0	0	0
PD 9	0	0	0	+	0	0	+	0	0	0	+	0	0
PD 10	0	0	0	0	0	0	0	0	+	0	0	0	0
Policy A	0	0	0	0	0	0	0	0	+	+	0	0	0
Policy B	0	0	0	+	0	0	0	0	0	+	+	0	+
PD 11	0	0	0	0	0	0	0	+	+	+	+	+	0
PD 12	-	0	0	0	0	-	0	-	0	0	-	0	++
PD 13	-	-	-	-	-	-	-	0	0	0	+	0	++
PD 14	-	-	-	-	-	-	-	0	0	0	0	+	++
PD 15	0	0	0	0	0	0	+	0	0	0	0	0	+
PD 16	+/-	0	0	0	0	+/-	+	0	0	0	0	0	+
PD 17	++	0	0	0	0	+	0	+	0	0	0	0	0
PD 18	0	0	0	0	0	0	0	0	0	0	0	0	++
PD 19	0	0	0	0	0	0	0	0	0	0	0	0	++
Policy C	0	0	0	0	0	0	0	0	0	+	+	0	+
PD 20	0	0	0	+	0	0	0	0	0	0	+	0	++
PD 21	0	0	0	+	+	0	0	0	0	0	0	0	+
Policy D	++	0	+	+	0	+	+	0	0	0	0	0	0
Policy E	+	0	0	0	0	+	0	0	0	0	0	0	0
Policy F	+	0	0	0	0	+	0	0	0	+	0	0	0
PD 22	++	+	+	+	0	+	0	0	0	+	+	0	0
PD 23	+	0	0	0	+	+	0	+	0	+	0	0	0
PD 24	++	0	0	0	0	+	+	0	0	0	0	0	0
Policy G	++	++	+	0	0	+	+	0	0	+	0	0	0
Policy H	0	0	0	0	0	+	+	0	0	0	0	0	0
Policy I	0	+	0	0	0	+	+	0	0	0	0	0	0
Policy J	+	++	+	0	0	+	0	0	0	0	0	0	0
Policy K	+	++	+	+	0	+	0	0	0	0	0	0	0
PD 25	+	0	0	+	+	+	0	0	0	+	+	0	0
PD 26	+	0	+	+	0	+	+	0	+	+	+	0	0
PD 27	+	0	0	+	++	0	0	0	0	0	0	0	0
PD 28	0	0	+	+	+	+	0	0	0	0	+	0	0

Policy or Policy Direction	1 Climate Change	2 Flood Risk	3 Biodiversity & Geodiversity	4 Landscape	5 Cultural Heritage	6 Pollution	7 Natural Resources	8 Waste	9 Housing	10 Health	11 Transport	12 Education	13 Economy
PD 29	+	0	+	0	0	++	0	0	0	+	0	0	0
PD 30	0	0	0	0	0	0	0	0	0	++	0	+	0
PD 31	++	0	0	0	0	+	0	0	0	+	++	+	+
PD 32	+	0	0	0	0	+	0	0	0	+	+	0	0
PD 33	+	0	0	0	0	+	0	0	0	+	+	0	0
PD 34	+	0	0	0	0	+	0	0	0	+	0	0	0
PD 35	+	0	0	0	0	0	0	0	0	0	0	0	+
PD 36	+	+	++	+	0	+	0	0	0	0	0	0	0
PD 37	+	+	++	+	0	+	0	0	0	0	0	0	0
PD 38	+	+	++	+	0	+	0	0	0	0	0	0	0
PD 39	++	+	++	0	0	+	+	0	0	+	0	0	+
PD 40	++	++	++	+	0	+	0	0	0	+	0	0	0
PD 41	++	0	+	0	0	+	0	0	0	0	0	0	0
PD 42	+	+	++	+	0	+	0	0	0	+	0	0	0
PD 43a	0	0	+	+	0	0	0	0	0	+	0	0	0
PD 43b	0	0	0	+	+	0	0	0	0	0	0	0	0
PD 43c	0	0	+	+	0	0	0	0	0	+	0	0	0
PD 43d	0	0	0	0	0	0	0	0	0	+	0	0	0
PD 43e	+	0	+	+	0	0	0	0	0	+	0	0	0
PD 44	0	0	0	0	0	0	0	0	0	+	0	0	0
PD 45	0	0	+	+	0	0	0	0	0	+	0	0	0
PD 46	0	0	0	+	+	0	0	0	0	0	0	0	0
PD 47	0	0	0	+	0	0	0	0	0	0	0	0	0
PD 48	0	0	0	+	+	0	0	0	0	0	0	0	0
PD 49	0	0	0	0	0	0	++	0	0	0	0	0	0

E.2 Vision and Strategic Objectives: South Warwickshire 2050

E.2.1 Vision

SWLP Vision													
<p>By 2050 South Warwickshire will be a flourishing, healthy and vibrant place where people will want to live, work and visit. The vision is to meet South Warwickshire’s sustainable development needs and strengthen local communities, while responding to the climate emergency. The plan will provide homes and jobs, boost and diversify the local economy, and provide appropriate infrastructure, in suitable locations, at the right time. Five overarching principles will determine how this development is delivered:</p> <p>A climate resilient and Net Zero Carbon South Warwickshire – adapting to the effects of climate change and mitigating against its causes, while avoiding any further damage that might arise from development and drive towards net zero carbon</p> <p>A well-designed and beautiful South Warwickshire – creating spaces where people want to be, which respect and reflect the existing beauty and heritage of the area</p> <p>A healthy, safe and inclusive South Warwickshire – enabling everyone to enjoy safe and healthy lifestyles with a good quality of life and addressing health inequalities</p> <p>A well-connected South Warwickshire – ensuring that development is physically and digitally connected, provided in accessible locations, and promotes active travel</p> <p>A biodiverse and environmentally resilient South Warwickshire – strengthening green and blue infrastructure and achieving a net increase in biodiversity across South Warwickshire</p> <p>It was agreed at Issues and Options stage that this document will not include Vision for Place as it was considered that Vision for Places will be included in Area Action Plans and Neighbourhood Plans.</p>													

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

E.2.1.1 The SWLP vision seeks to see the Plan area become more climate resilient through meeting carbon net zero targets, adapting to existing impacts and mitigating against the causes of climate change. This is expected to have a major positive impact on the Plan area’s contribution to climate change (SA Objective 1). This will also be anticipated to provide secondary minor positive benefits to minimising exposure to flood risk (SA Objective 2). Improving biodiversity within the Plan area through strengthening the provision of green and blue infrastructure (GI and BI) will support the expansion of the ecological network in South Warwickshire. Improved GI and BI will also be expected to support the reduction in flood risk across the SWLP area through helping to slow surface water flows and increase infiltration rates, particularly in built-up areas. Therefore, a major positive impact is identified for biodiversity and geodiversity (SA Objective 3).

- E.2.1.2 Through ensuring South Warwickshire creates well-designed and beautiful spaces the SWLP vision will ensure heritage assets in the Plan area are valued and protected to maintain the distinctive local character and “*reflect the beauty and heritage of the area*”. Therefore, minor positive impacts have been identified with regards to landscape and cultural heritage (SA Objectives 4 and 5). It is recommended that the SWLP vision contains stronger wording regarding conserving and enhancing heritage assets in order to support the identification of more positive effects.
- E.2.1.3 The SWLP vision aims to ensure the provision of necessary infrastructure in the most appropriate locations, and that there will be a provision of homes and jobs to boost the local economy. Furthermore, the SWLP vision will ensure that development is physically and digitally connected, increasing access to local services which includes employment locations. The vision also seeks to ensure residents have good quality lives and that health inequalities are addressed across the Plan area. As a result, this will be expected to have a major positive impact on the provision of housing, the economy and health (SA Objectives 9, 10 and 13). Through locating in development in areas that are both physically and digitally connected and assuming infrastructure provision will include educational facilities, it is anticipated that this will have a minor positive impact on education (SA Objective 12). Improved accessibility will increase access to education across the SWLP area and an increased job provision could result in increased professional training opportunities for people in and around the Plan area.
- E.2.1.4 Through ensuring that development in the Plan area is well located and that means of active travel are promoted, the SWLP vision is anticipated to have a minor positive impact on transport and accessibility (SA Objective 11) where active travel routes will be expected to reduce the need for private cars to access local services, amenities and employment opportunities. Secondary minor positive impacts will also be expected for pollution (SA Objective 6) where a reduced use in private vehicles will also be expected to reduce air pollutants across the Plan area. The SWLP vision could be strengthened through reference to sustainable transport networks to further support a reduced need for private vehicles in South Warwickshire.
- E.2.1.5 The SWLP vision is not anticipated to result in adverse impacts on natural resources or waste and therefore negligible impact have been identified (SA Objectives 7 and 8).

E.2.2 Strategic Objectives

Strategic Objectives

Strategic Objective 1: Providing sustainable levels of growth in the area

Supporting an appropriate level of growth which is proportionate in scale and is located in most sustainable locations especially with good transport connections and where people are able to access affordable homes, jobs, services, health, education, social and community facilities.

Strategic Objective 2: Delivering homes that meet the needs of all our communities

Meeting South Warwickshire’s current and future housing need. Allowing growth in new homes that meet the diverse needs of our residents, including affordable, student, specialist and self and custom build housing along with the accommodation needs of our gypsy and traveller and travelling showpeople communities.

Strategic Objective 3: Providing infrastructure in the right place at the right time

Ensuring development is supported by the infrastructure needed to support the growth in new homes and jobs. This includes (but not limited to):

- Roads and active travel routes
- Sustainable modes of travel through enhancing greener networks for walking and cycling

Strategic Objectives

- Schools
- Sport and Recreation
- Health care facilities
- Digital Infrastructure and Utilities
- Waste management
- Water supply and wastewater management
- Flood risk
- Blue and Green infrastructure

Strategic Objective 4: Developing opportunities for jobs

Accommodating the growth in employment opportunities that build upon our strong and diverse economy, including innovative industries and technologies, embracing the potential of a green economy.

Strategic Objective 5: Making effective use of land and natural resources

Encouraging the effective use of previously developed land and natural resources including:

Re-use and refurbishment of unused existing buildings

Making most efficient use of land and buildings

Using sustainable construction techniques

Encouraging circular economy

Efficient use of water resources whilst protecting water quality and flood management

Strategic Objective 6: Contributing towards Net Zero Carbon targets (related to overarching principle- *A resilient and Net Zero Carbon South Warwickshire*)

Ensuring that new development does not cause a net increase in carbon emissions and taking positive action to achieve net zero. Ensuring that new developments are resilient to climate change and that every opportunity is taken to reduce existing carbon emissions and mitigating and adapting to reduce the impact of climate change and reduce risk to people, communities, the environment and the economy. This will be achieved through: (Please note this is not an exhaustive list)

- Design of the new development;
- Minimising energy use in both new and existing buildings;
- Promoting low carbon and renewable energy generation in right locations;
- Reducing dependency on fossil fuels and reduce greenhouse gas emissions;
- Increasing biodiversity, nature recovery and exploring the role of carbon capture, whole life carbon and carbon sequestration;
- Improving water sustainability and efficiency measures;
- Using nature-based solutions to climate change;
- Reducing and managing risk of flooding from all sources;
- Protecting and enhancing the water resources and improving water quality
- Support low carbon transport initiatives

Strategic Objective 7: Creating attractive places (related to *A well-designed and beautiful Warwickshire*)

- Focusing and promoting a high standard of design in new developments that are innovative, adaptable, low carbon, climate resilient, locally distinctive and respect the local character and setting of the existing settlements.

Strategic Objective 8: Protecting and enhancing our heritage and cultural assets (related to overarching principle- *A well-designed and beautiful Warwickshire*)

Protecting and enhancing the wealth of heritage and cultural assets in South Warwickshire, and where possible enhancing access and understanding of these assets.

Strategic Objective 9: Enriching the tourism potential (related to overarching principle- *A well-designed and beautiful Warwickshire*)

Enriching the quality of the visitor experience through the wealth of cultural, heritage and countryside assets that the area has to offer.

Strategic Objective 10: Improving the health, safety and quality of life of our communities (related to overarching principle- *A healthy, safe and inclusive South Warwickshire*)

Strategic Objectives

Promoting health and wellbeing for people of all ages and reduce health inequalities by:

- creating developments that contribute to physical and mental wellbeing, combat loneliness and isolation, lower levels of pollution, and are free of crime and the fear of crime.

Strategic Objective 11: Connecting people to places (related to overarching principle A well-connected South Warwickshire

Increasing and improving access to sustainable and active travel options that enhance connectivity between people and places and people and nature and by connecting people to centres, jobs, education, cultural facilities, green spaces and countryside.

Strategic Objective 12: Protecting and enhancing our environmental assets (related to overarching principle -A biodiverse and environmentally resilient South Warwickshire

Protecting what already exists and maximising opportunities for enhancement including improvements to the green space network through tree planting and other biodiversity initiatives.

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

E.2.2.1 Strategic Objective 1 is anticipated to have major positive impacts with regard to housing, health, accessibility, education and the economy (SA Objectives 9, 10, 11, 12 and 13) where it supports the provision of affordable housing, employment and local services and amenities. Furthermore, through ensuring growth is placed in sustainable locations with good transport connections, it is anticipated that this will result in minor positive impacts with regards to climate change and pollution (SA Objectives 1 and 8), where reduced private vehicle use will support improvements to air quality and limit contributions to climate change in the Plan area. Development is to be of appropriate scale, which will be expected to be in keeping with the current identity of the area. A negligible impact on landscape character (SA Objective 4) is identified where adverse impacts are anticipated to be avoided, however further stronger wording in relation to the appropriate scale of development is recommended to outline how development can protect the local landscape.

E.2.2.2 Strategic Objective 2 is anticipated to have a major positive impact on housing as it sets out the Councils’ support for a wide range of housing types, including different sizes and tenures, including affordable, specialist and custom build housing which is anticipated to meet a range of housing needs for South Warwickshire’s residents.

- E.2.2.3 Strategic Objective 3 is anticipated to have major positive impacts for flood risk, biodiversity and geodiversity, waste, health, accessibility and education (SA Objective 2, 3, 8, 10, 11 and 12). This objective sets out the aims to ensure development in the Plan area is supported by adequate necessary infrastructure to meet the local needs. Through supporting infrastructure relating to flood risk and the expansion of GI and BI across the Plan area indirect positive impacts are also anticipated in relation to climate change and pollution (SA Objectives 1 and 6) where ecosystem service functions associated with GI and BI will support air filtration and natural flood alleviation measures. GI and BI is also anticipated to create attractive local landscapes and townscapes which provide ecological corridors through built up areas, secondary minor positive impacts are identified on the local landscape (SA Objective 4).
- E.2.2.4 Strategic Objective 4 is anticipated to have a major positive impact on employment as it seeks to accommodate a growth in employment opportunities for those in and around the Plan area. Minor positive impacts have been identified for education (SA Objective 12) where a wide range of employment opportunities may have more possibilities for professional training opportunities. A minor positive impact is also identified for climate change (SA Objective 1) where embracing a green economy may support the development of low-carbon industries in the Plan area which could expect to strengthen South Warwickshire's adaptability to and mitigation of climate change.
- E.2.2.5 Strategic Objective 5 is anticipated to have major positive impacts for landscape, natural resources and waste (SA Objectives 4, 7 and 8) as it seeks to make the most efficient use of resources through using previously developed land, repurposing existing unused buildings, encouraging sustainable construction techniques and supporting a circular economy. Minor positive impacts in relation to climate change and pollution are identified (SA Objectives 1 and 6) due to the reuse of materials and encouraging sustainable construction techniques and protection of water quality. Additionally, protecting flood management implemented across South Warwickshire will also expect to ensure flooding does not pose an adverse impact to residents or development, therefore a minor positive impact is identified for flood risk (SA Objective 2).
- E.2.2.6 For Strategic Objective 6 major positive impacts have been identified with regards to climate change, flood risk and biodiversity and geodiversity (SA Objectives 1, 2 and 3) where the objective aims to reduce fossil fuel dependency, reduce and manage flood risk, support nature recovery and boost biodiversity. Ecosystem service functions associated with increasing biodiversity will support water quality and air filtration, reducing pollution and benefitting the health of local people, therefore minor positive impacts are identified for pollution and health (SA Objectives 6 and 10). Increasing biodiversity such as GI is also anticipated to support the maintenance and improvement of the local landscape and townscape character, as such a minor positive impact has been identified for SA Objective 4. The Objective also seeks to encourage the most sustainable and efficient use of resources including minimising energy use and water efficiency improvement measures, as such a minor positive impact is identified for natural resources (SA Objective 7). Low carbon transport initiatives will be supported and therefore it is likely that access to sustainable transport options will be increased across the SWLP area and a minor positive impact on accessibility is identified (SA Objective 11).

- E.2.2.7 Strategic Objective 7 is anticipated to result in a major positive impact on the distinctive landscape and townscape (SA Objective 4) characters present within South Warwickshire. Through ensuring development is adaptable and climate resilient the contribution of households in South Warwickshire to the climate crisis will be minimised and through respecting the local character and setting of surrounding settlements the heritage features, such as listed buildings, in the Plan area will be protected. As such, minor positive impacts have been identified for climate change and cultural heritage (SA Objectives 1 and 5).
- E.2.2.8 Strategic Objective 8 seeks to protect and enhance the rich heritage present across the SWLP area. This will be anticipated to result in a major positive impact on cultural heritage (SA Objective 5). It is recommended that the objective recognises the significance of the setting of these heritage assets in relation to the benefits on the local landscape.
- E.2.2.9 Strategic Objective 9 is anticipated to support appreciation for the historic environment. Through encouraging heritage related tourism, it is not only likely to boost the local economy, but also encourage a wider appreciation of the historic environment and local landscape. Therefore, minor positive impacts have been identified for the landscape, cultural heritage and the economy (SA Objectives 4, 5 and 13). It is recommended that this Strategic Objective incorporates wording which will ensure heritage assets and their setting and surrounding will not be adversely affected by heritage-related tourism, where the significance of the historic environment is maintained.
- E.2.2.10 Strategic Objective 10 is anticipated to have a major positive impact on health (SA Objective 10) as it seeks to ensure development contributes to residents' physical and mental wellbeing, as well as ensuring those who are more vulnerable to isolation and loneliness in the Plan area are better supported. Reducing levels of pollution will support improved air quality and have subsequent benefits for health, such as reducing risks of heart disease, respiratory conditions and cancers. As such, a minor positive impact has been identified for pollution (SA Objective 6).
- E.2.2.11 Strategic Objective 11 is anticipated to have a major positive impact on transport and accessibility (SA Objective 11) as it seeks to ensure residents in the Plan area are well connected and have access to sustainable and active means of transport to meet their needs. This is anticipated to have a minor positive impact on climate change and pollution as it will reduce the necessity for private vehicles in Plan area, reducing emissions levels and air pollutants. Minor positive impacts are also anticipated for health, education and the economy (SA Objectives 10, 12 and 13) where improved and sustainable transport options will increase accessibility to local services and amenities including access to the countryside, healthcare facilities, schools and employment opportunities.
- E.2.2.12 Strategic Objective 12 is expected to have a major positive impact on biodiversity (SA Objective 3) where it seeks to support the green space network and other biodiversity related initiatives. The multifunctional ecosystem service functions of GI and BI in South Warwickshire are anticipated to result in minor positive impacts on climate change, flood risk, pollution and health (SA Objectives 1, 2, 6 and 10) where they will work to support air filtration, water quality and natural flood alleviation.

E.3 Meeting South Warwickshire’s Sustainable Development Requirements

E.3.1 Policy Direction 1: Meeting South Warwickshire’s Sustainable Development Requirements

Draft Policy Direction 1: Meeting South Warwickshire’s Sustainable Development Requirements

The South Warwickshire Local Plan will make provision for the delivery of at least 1,679 dwellings per annum, in line with the HEDNA; with sufficient flexibility to accommodate up to 2,188 dwellings per annum, in line with the 2024 NPPF Standard Method. This equates to at least 41,975 dwellings over a 25-year plan period from 2025-2050, with sufficient flexibility to accommodate up to 54,700 dwellings.

After accounting for existing commitments, and an assumed windfall allowance, there remains a “to find” figure of 15,532 dwellings (HEDNA) or 28,257 dwellings (2024 Standard Method). This to find figure represents the scale of development to be accommodated by the SWLP. In terms of employment need, the South Warwickshire Local Plan will plan for at least the following (in hectares) over the period 2021-2050. Note that in the table below, residual needs are shown in bold as negative figures; existing surpluses are shown in bold as positive figures:

	Stratford-on-Avon District	Warwick District	South Warwickshire
Residual (net) non-strategic industrial need (2021-50)	-139	-78	-217
Residual (net) office need (2021-50)	-3	+14/-6.8	+11/-9.8
Residual (net) strategic industrial site need (2021-45)	-	-	-75 to -125

Tables 2 and 3 below illustrate how these figures have been calculated for each housing requirement.

Table 2: Housing calculation using the HEDNA method:

HEDNA	Stratford-on-Avon District	Warwick District	South Warwickshire
Total housing need (per annum)	868	811	1,679
Total housing need (25 year plan period)	21,700	20,275	41,975
Existing commitments	7,962	9,106	17,068
Assumed windfall allowance in SWLP from 2025 (per annum)	274	101	375
Assumed windfall allowance in SWLP from 2025 (25 year plan period)	6,850	2,525	9,375
To-Find Figure (i.e. housing need minus commitments and windfalls)	6,888	8,644	15,532

Table 3: Housing calculation using the 2024 NPPF standard method

Draft Policy Direction 1: Meeting South Warwickshire’s Sustainable Development Requirements

2024 NPPF Standard Method	Stratford-on-Avon District	Warwick District	South Warwickshire
Total housing need (per annum)	1,126	1,062	2,188
Total housing need (25 year plan period)	28,150	26,550	54,700
Existing commitments	7,962	9,106	17,068
Assumed windfall allowance in SWLP from 2025 (per annum)	274	101	375
Assumed windfall allowance in SWLP from 2025 (25 year plan period)	6,850	2,525	9,375

Provision for employment land over the plan period will be made for at least the following (note that in Table 4, residual needs are shown in bold as negative figures; existing surpluses are shown in bold as positive figures).

Table 4: Employment Land residual needs and existing surpluses

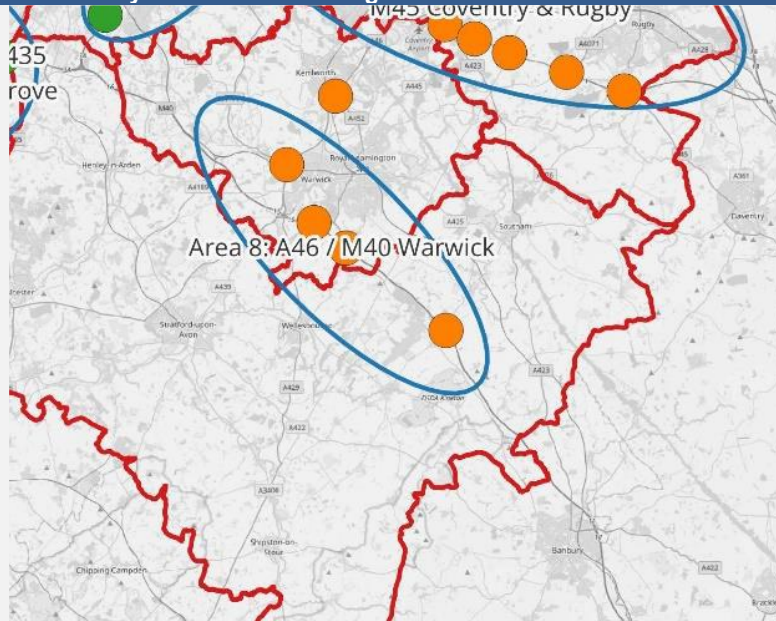
	Stratford-on-Avon	Warwick	South Warwickshire
Total (gross) non-strategic industrial need (2021-50)	196	113	309
Supply of non-strategic industrial floorspace (2021-50)	57	35	92
Residual (net) non-strategic industrial need (2021-50)	-139	-78	-217
Total (gross) office need (2021-50)	7	16	23
Supply of office floorspace (2021-50) ²	4	30/10	34/14
Residual (net) office need (2021 – 50)	-3	+14/-6.8	+11/-9.8
Residual (net) strategic industrial need (2021-45) ³	-	-	-75 to -125

The WMSESS identifies a residual need for 75-125 ha strategic sites up to 2045, to include 1-2 mixed/B8 sites and 0-1 B2 sites within Road Opportunity Area (ROA) 8 along the M40/A46. It is proposed that the upper threshold of 125 ha is used, as recommended within the WMSESS (2024). Strategic sites in this context refer to large scale employment sites typically over 25 ha and largely dedicated to units of over 9,300 sqm (100,000sqft). Non-strategic need refers to industrial (B2/B8 class) uses to meet a local need, generally for units under 9,300sqm (100,000sqft) but also for units over 9,300sqm (100,000sqft) where these are to meet a local need.

It should be noted that while ROA 7 overlaps the north of Warwick (and includes existing commitments such as the Sub-Regional Employment Site and Coventry Airport), junction opportunities and further land do not fall within Warwick District; whilst ROA 9 overlaps the western edge of Stratford-on-Avon, however, this will likely be Redditch and Bromsgrove facing. As such, ROA 8 is the primary opportunity area wholly within South Warwickshire.

Figure 7: Road Opportunity Area 8, WMSESS (2024)

Draft Policy Direction 1: Meeting South Warwickshire's Sustainable Development Requirements



South Warwickshire's housing and employment needs will be distributed using the "Sustainable Travel and Economy" Spatial Growth Strategy. Three "priority areas" have been delineated which determine areas of land which fall within this Spatial Growth Strategy, based on proximity to the various elements that form part of the strategy.

South Warwickshire's existing urban areas fall within Priority 1, and full use will be made of suitable urban brownfield land before development is considered elsewhere.

There is insufficient urban brownfield land to accommodate South Warwickshire's housing and employment land needs. The majority of the SWLP's strategic growth needs will be met within priority areas 1-3.

Strategic growth will be accommodated outside of the priority areas only where it is of sufficient scale for significant infrastructure upgrades to be provided on site (for example at the scale of a new settlement).

Small-scale growth to meet identified local needs may be accommodated outside of the priority areas. Neighbourhood Development Plans are considered to be an appropriate vehicle for delivering such sites.

Twenty-four areas have been identified as locations for potential strategic growth. To provide the opportunity to consider reasonable alternatives, the identified strategic growth locations could accommodate well in excess of South Warwickshire's housing and employment needs, and it is not expected that all of the areas will be allocated in the SWLP.

Further work will be undertaken, prior to publication of the Regulation 19 Local Plan to identify the sites that are proposed to be allocated. This will include consideration of responses received on the Preferred Options document.

Similarly, the strategic growth locations identified include a mixture of Green Belt and non-Green Belt locations. This will enable a careful assessment of the sustainability of different options, which is necessary to determine whether there are "exceptional circumstances" that would justify releasing land from the Green Belt.

The mix of proposed uses within each strategic growth location is not currently determined.

Where suitable sites have been identified in potential new settlement locations, these are included amongst the strategic growth locations. Potential new settlement locations with few or no identified sites do not feature in this list.

Strategic Growth Locations:

Draft Policy Direction 1: Meeting South Warwickshire’s Sustainable Development Requirements

Reference	Strategic Growth Location
SG01	South of Coventry Group
SG02	Stoneleigh Park Employment Group
SG03	Coventry Airport Group
SG04	South of Kenilworth Group
SG05	East of Lillington Group
SG06	North of Leamington Group
SG07	Wedgnock Park Farm Employment Group
SG08	West of Warwick Group
SG09	South of Europa Way Group
SG10	Bishops Tachbrook Group
SG11	South East of Whitnash Group
SG12	Southam Group
SG13	Gaydon Lighthorne Heath Group
SG14	East of Gaydon Group
SG15	North of Wellesbourne Group
SG16	South of Wellesbourne Group
SG17	Shipston-on-Stour Group
SG18	West of Stratford-Upon-Avon Group
SG19	East of Stratford-Upon-Avon Group
SG20	Bidford-on-Avon Group
SG21	Alcester Group
SG22	West of Studley Group
SG23	North of Henley-in-Arden Group
SG24	Hockley Heath Group

Note that in addition to the 24 Strategic Growth Locations, potential New Settlement locations may also contribute to South Warwickshire’s development needs. See section 4.2 for further details.

The Regulation 19 Local Plan will confirm the development requirements for each proposed allocation, including the required mix of uses, mitigation and enhancement measures and infrastructure (including open space, active travel, education, community facilities, highways, public transport).

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

- E.3.1.1 Policy Direction 1 sets out the Councils' intention to deliver at least 41,975 homes through the SWLP during the Plan period to 2050, in accordance with the identified need as calculated through the Housing and Economic Development Needs Assessment (HEDNA) (2022)¹ and further update (2024)². The HEDNA figures factor in the latest population trends and household/economic projections, which will be likely to ensure that the amount of growth allocated through the SWLP is based upon an accurate reflection of local needs.
- E.3.1.2 The government's reforms to the National Planning Policy Framework (NPPF) in December 2024 includes a revised method for calculating housing need³. For South Warwickshire, this would mean there is a need to provide 1,062 homes in Warwick District and 1,126 homes in Stratford-on-Avon District per annum, totalling 54,700 homes across South Warwickshire for the Plan period to 2050. Policy Direction 1 recognises that the SWLP may need to cater to this higher housing number and sets out the Councils' intentions to identify sufficient sites to accommodate this.
- E.3.1.3 It is expected that the housing numbers will cater to the needs of all residents, ensuring a range of housing types, sizes and tenures as well as affordable homes. A major positive impact on housing provision is identified (SA Objective 9).
- E.3.1.4 Employment land will be delivered in accordance with the findings of the latest South Warwickshire Employment Study (2024)⁴ to ensure that appropriate types of employment land can be provided to meet local demands and the needs of different business sectors. In doing so, it is likely that a major positive impact on the economy will be achieved (SA Objective 13).
- E.3.1.5 Sources of development will include existing committed sites and the identification of new sites within urban areas and "*priority areas*" that are well served by public transport, as well as exploring wider areas that could support strategic growth and new settlements to meet a proportion of required growth. The specific locations are not known at this stage; however, 24 options for strategic development sites and 12 options for new settlements have been evaluated in the SA process and presented within **Appendix B** and **Appendix C**, respectively. New settlements are also discussed further under Policy Direction 2 (see **section E.3.2**).

¹ Icen (2022) Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA). Final Report. November 2022. Available at: <https://www.southwarwickshire.org.uk/swlp/technical-evidence.cfm> [Date accessed: 15/10/24]

² Icen (2024) Further Advice on Housing & Employment Land Needs. February 2024. Available at: <https://www.southwarwickshire.org.uk/swlp/technical-evidence.cfm> [Date accessed: 15/10/24]

³ MHCLG (2024) National Planning Policy Framework. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf> [Date accessed: 18/12/24]

⁴ Icen (2024) South Warwickshire Employment Land Study. Final Report. September 2024.

- E.3.1.6** The intention to allocate new development in accordance with opportunities for public transport connectivity and proximity to enterprise hubs and town centres, in accordance with the proposed “*Sustainable Travel and Economy Spatial Growth Strategy*”, could potentially lead to a minor positive impact on sustainable accessibility (SA Objective 11). This may also help to reduce the need to travel and the number of journeys via private cars, and consequently reduce emissions of transport-associated greenhouse gases (GHGs) as well as air pollutants such as NO₂ and particulate matter. However, a substantial amount of new development is set out in Policy Direction 1 including at least 41,975 homes and a range of employment land including up to 125ha of strategic employment sites, which may result in emissions during both construction and occupation. On balance, a minor negative impact on climate change and pollution is identified (SA Objectives 1 and 6). Furthermore, a minor negative impact on waste is likely given the large scale of development proposed (SA Objective 8).
- E.3.1.7** Without more detailed information regarding specific site location, design, layout and other supporting infrastructure that may be provided, it is expected that the large amount of development will result in a significant loss of ‘best and most versatile’ (BMV) agricultural land, significant changes to the character of sensitive landscapes, and potentially some fragmentation of the ecological network, given the need to explore development outside of existing settlement boundaries. A minor negative impact is identified in relation to biodiversity (SA Objective 3) and a potential major negative impact on landscape and natural resources (SA Objectives 4 and 7).
- E.3.1.8** The likely impact upon flood risk, cultural heritage, health and education (SA Objectives 2, 5, 10 and 12) will be more dependent upon the specific location and design of new development, which is not known at this stage. Depending on site-specific details, there is potential for both positive and negative effects to occur, and as such the impact of development is uncertain against these three SA Objectives.

E.3.2 Policy Direction 2: Potential new settlements

Draft Policy Direction 2: Potential new settlements

One or more new settlements will be identified and considered for strategic site allocation in the most sustainable locations where they can be developed to a suitable minimum size to provide the required infrastructure (e.g. essential healthcare and educational facilities) for substantial internalisation of trips

12 potential new settlement locations have been identified through the Issues and Options consultation and further evidence gathering, which have been categorised as more or less suitable based on the work undertaken to date. Further evidence is being gathered to further refine site location selection suitability.

Ref	Location	Potential Suitability
A1	Land south of Tanworth-in-Arden*	Less Suitable
A2	Land east of Wood End*	Less Suitable
B1	Land at Hatton*	More Suitable
C1	Land south of Kingswood*	Less Suitable
E1	Long Marston Airfield*	More Suitable
F1	Land to the west of Ufton*	Less Suitable
F2	Lands south of Deppers Bridge*	Less Suitable
F3	Land north-east of Knightcote*	Less Suitable
G1	Land west of Knightcote*	Less Suitable
X1	Land south of Leamington/north of	Less Suitable
X2	Land south of Leamington Spa/Whitnash and west of	More Suitable
BW	Land at Bearley and Wilmcote	More Suitable

Draft Policy Direction 2: Potential new settlements

* The Potential New Settlement names have been revised and might differ from the Issues and Options stage document. Whilst their names have been revised, there is no change to their boundaries.

**Site boundaries have been revised to reflect known land promoters interests.

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

E.3.2.1 Policy Direction 2 outlines how the Councils will consider new settlements to form part of the spatial strategy for the SWLP, where they can function as a standalone settlement. At this stage, the Councils have not identified preferred sites for development, but have identified 12 potential locations for new settlements within South Warwickshire to be considered. These 12 options for new settlements have been evaluated in the SA process and presented within **Appendix C**.

E.3.2.2 New settlements as defined by the Councils will have potential to make a significant contribution to housing targets, with a capacity in the region of 6,000–10,000 homes each. It is expected that new settlements could support a range of housing types, densities and layouts to provide accommodation to meet the varied needs of the population. Therefore, a major positive impact on housing provision will be likely (SA Objective 9).

E.3.2.3 Alongside housing growth, infrastructure will be provided to serve the new community, which is likely to include healthcare, primary and secondary schools, and potentially retail, leisure and employment opportunities given the intention to support “*substantial internalisation of trips*”. Co-locating homes and services/jobs within a self-sufficient settlement will be likely to reduce journey times and the need to travel, thereby encouraging cycling and walking for local trips, supporting 20-minute neighbourhood principles and reducing emissions of GHGs and air pollutants associated with road transport. New residents will be encouraged to live active and healthy lifestyles, and have sustainable access to a range of facilities, supporting a cohesive local community. The policy direction could potentially lead to major positive impacts on health, accessibility, education and the economy (SA Objectives 10, 11, 12 and 13).

E.3.2.4 Balancing the likely increase in domestic and traffic emissions, pollution and household waste associated with the large quantum of growth proposed, alongside the sustainability benefits associated with compact and self-sufficient settlements, a minor negative impact is identified for climate change, pollution and waste (SA Objective 1, 6 and 8). These potential adverse effects could be minimised through careful layout and design that supports low-carbon and renewable technologies, energy efficient buildings and integration of multi-functional green infrastructure (GI); it is recommended that Policy Direction 2, or other policies in the SWLP when fully formed, ensures clear reference to sustainable construction and design principles such as these.

- E.3.2.5 New settlements are likely to be located in areas currently characterised by rural villages and open countryside. The proposed development of several thousand homes and supporting infrastructure will require a large quantity of land for development, which is likely to include a significant proportion of the Plan area’s BMV agricultural land. A major negative impact on natural resources (SA Objective 7) cannot be ruled out.
- E.3.2.6 Loss of undeveloped land and introduction of new built form may also lead to a detrimental effect on flood risk and resilience to climate change, whereby the increased extent of impermeable surfaces can increase water run-off rates and reduce natural flood water storage potential; these effects can however be avoided or reduced, and potentially flood alleviation schemes introduced, through avoiding areas of highest flood risk, factoring in allowances for climate change, and ensuring integration of GI and sustainable drainage systems (SuDS).
- E.3.2.7 Furthermore, the loss of undeveloped land is likely to include aspects of the ecological network that may form vital habitats or corridors for biodiversity that may be lost or eroded due to the introduction of new built form. Depending on the location of the new settlements, there is also potential for adverse effects on designated biodiversity sites through various pathways including increased recreational pressures, water and air pollution. Although, new settlements will also provide an opportunity to plan a cohesive development that is designed to avoid significant adverse effects and allow for the integration of biodiversity corridors and habitats alongside development; biodiversity net gain and the roll-out of nature recovery networks may be more likely to be delivered in a way that creates well connected and functional biodiversity networks in this sense.
- E.3.2.8 South Warwickshire supports some high quality and sensitive landscapes, including the Cotswolds National Landscape which lies partially within the south of the Plan area. Depending on the specific location and number of new settlements to be developed, there is potential for significant changes to the rural character through the introduction of incongruous development and potentially a reduction in tranquillity associated with noise and light pollution. However, at the local scale there is also potential for new settlements to be carefully planned and designed to integrate GI and high quality development that creates a strong sense of place and local identity.
- E.3.2.9 Similarly, the introduction of large-scale new development in currently rural locations will likely have potential to alter the character and setting of cultural heritage assets in these areas, and result in the loss of other non-designated features such as historic field patterns. There may however be opportunities to avoid or mitigate these adverse effects through careful layout and design of new development, as well as the prospect of better revealing the significance, or increasing understanding and awareness, of heritage assets alongside new development in some circumstances.
- E.3.2.10 Overall, there is potential for both positive and negative effects on flood risk, biodiversity, landscape and cultural heritage. The impact on SA Objectives 2, 3, 4 and 5 is uncertain.

E.3.3 Policy Direction 3: Small scale development, settlement boundaries and infill development

Draft Policy Direction 3: Small scale development, settlement boundaries and infill development

The SWLP will identify Built Up Area Boundaries (BUABs) for settlements in South Warwickshire. This will include:

Draft Policy Direction 3: Small scale development, settlement boundaries and infill development

- Reviewing, and where appropriate updating, existing adopted boundaries in the current Stratford District Core Strategy, Warwick District Local Plan, and Neighbourhood Development Plans;
- Reviewing, and where appropriate updating, draft boundaries presented in the Stratford District Site Allocations Plan Revised Preferred Options document;
- Identifying a suitable size threshold above which settlements should have a BUAB;
- Drafting boundaries for those settlements above the size threshold which do not currently have an adopted or draft BUAB.

The SWLP will review whether a revised settlement hierarchy classification is required to replace the current classifications in the Stratford District Core Strategy and Warwick District Local Plan.

The SWLP will support Neighbourhood Development Plans as an appropriate mechanism for making housing and employment allocations in smaller settlements.

Consideration will be given to the need for the SWLP to identify a number of small sites in order to ensure provision of a 5 year housing land supply and meet the requirement in the NPPF for at least 10% of the housing requirement to be accommodated on sites no larger than one hectare.

Small-scale development on unallocated sites will be supported in the following ways:

- In Green Belt locations:
 - Limited infilling within Built Up Area Boundaries;
 - Limited affordable housing for local community needs, within or adjacent to Built Up Area Boundaries.
- In non-Green Belt locations:
 - Housing, employment and other settlement related development, within or adjacent to Built Up Area Boundaries.
 - Where such sites are adjacent to Built Up Area Boundaries, a threshold site size will be established, below which such developments are likely to be acceptable. The threshold will be determined factoring in:
 - The scale of the settlement;
 - Whether the site falls into Spatial Growth Strategy Priority Areas 1-3 or outside these areas.
 - Where such sites fall within the Cotswold National Landscape, proposals will need to accord with other relevant policies in the SWLP.

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

E.3.3.1 Policy Direction 3 sets out the Councils’ support for small-scale development within or adjacent to settlement boundaries of main towns and rural centres, recognising the contribution that these sites can make to meeting overall development needs.

E.3.3.2 The Councils propose to review existing Built Up Area Boundaries (BUABs) for settlements to ensure they remain relevant and fit for purpose, which could be beneficial to address objectives for the new growth strategy up to 2050 and ensure consistency across both districts within South Warwickshire.

E.3.3.3 Through supporting small-scale development within or adjacent to BUABs, a minor positive impact on housing provision and accessibility will be likely (SA Objectives 9 and 11). Allowing more infill development and promoting compact, well-served settlements may also lead to minor positive impacts on climate change and pollution (SA Objectives 1 and 6) owing to the reduced need to travel by car, and consequent reduction in emissions including CO₂, NO₂ and particulate matter.

E.3.3.4 This strategy could potentially help to encourage the re-use of previously developed land within settlements, leading to a more efficient use of land. A minor positive impact on natural resources is identified (SA Objective 7). This will also be likely to reduce the potential for adverse effects on South Warwickshire's biodiversity and geodiversity, landscape character and cultural heritage, leading to negligible impacts for these three SA Objectives (SA Objectives 3, 4 and 5), by ensuring that an up-to-date assessment is made to distinguish between settlements and the surrounding countryside.

E.3.4 Policy Direction 4: Accommodating housing needs arising from outside South Warwickshire

Draft Policy Direction 4: Accommodating housing needs arising from outside South Warwickshire

The South Warwickshire Local Plan will be underpinned by a housing need and availability evidence base that considers the Coventry and Warwickshire Housing Market Area as well as the Greater Birmingham and Black Country Housing Market Area. This evidence base will consider a strategic approach that addresses any shortfall of land availability to deliver in full the Housing Market Area's Objectively Assessed Housing Need or other evidenced housing need arising outside South Warwickshire.

If evidence and the duty to co-operate process clearly indicates that there is a housing or employment need that cannot be met within the administrative boundaries of the authority in which the need arises and part or all of the need could most appropriately be met within the South Warwickshire Local Plan, reserve sites will be released for this purpose, or when the relevant authority's 5 year housing land supply calculation falls below the thresholds set out in national planning policy guidance.

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

E.3.4.1 Paragraph 62 of the NPPF⁵ states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method outlined in planning practice guidance (PPG)⁶, and that “*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*”.

⁵ MHCLG (2024) National Planning Policy Framework. December 2024. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cadc3476e/NPPF-December-2024.pdf> [Date accessed: 18/12/24]

⁶ DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 17/10/24]

- E.3.4.2 The Duty to Cooperate (DtC) was created in the Localism Act 2011⁷ and places a legal duty on local planning authorities (LPAs) to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- E.3.4.3 Policy Direction 4 outlines the proposed approach of the Councils to consider allocating additional reserve sites through the SWLP, where it is evidenced that neighbouring authorities within the Coventry and Warwickshire Housing Market Area (HMA) or the Greater Birmingham and the Black Country HMA cannot meet their housing needs.
- E.3.4.4 In seeking to contribute to wider HMA needs, this policy direction has the potential to lead to significant benefits for housing delivery (SA Objective 9) and will demonstrate compliance with national policy. However, if the SWLP goes beyond meeting the needs of the Plan area itself, there is a risk that more pressure will be placed on South Warwickshire's infrastructure, natural environment and built heritage. The specific impacts of such a strategy would need to be evaluated when more detail is known regarding the scale, location and nature of growth to be proposed. At this stage of the plan making process, the potential impact across the remaining SA Objectives is uncertain.

E.3.5 Policy Direction 5: Infrastructure requirements and delivery

Draft Policy Direction 5: Infrastructure requirements and delivery

Development proposals should be consistent with and contribute to the implantation of transport strategies set out in relevant strategies, including the West Midlands Rail Executive's Rail Investment Strategy, The Warwickshire Local Transport Plan, Warwickshire Rail Strategy, Cycling and Walking Infrastructure Plan, Bus Improvement Plan, Stratford-upon-Avon Transport Strategy and updates to these and other policies documents that may be prepared over the course of the lifetime of this Local Plan.

All new development must provide appropriate on- and off-site infrastructure. Development proposals of a strategic nature will need to contribute and help deliver infrastructure that is contained within the Local Plan and IDP.

In addition to strategic infrastructure requirements, the Local Plan will identify development requirements that will apply to each of the allocated sites. This will include requirements relating to e.g. ecology, flood risk, heritage, active travel, highways, education, healthcare, renewables and utilities.

Where new development creates a need for new or improved site-specific infrastructure, provision of such infrastructure or contributions will be sought from developers (through Section 106 and Section 278 legal agreements) to make the development acceptable in planning terms.

The IDP and supporting evidence base will identify how strategic infrastructure requirements to support the spatial growth strategy will be delivered.

Where development creates a requirement for new or improved infrastructure beyond existing provision, including specific development requirements identified in the Local Plan, developers will be expected to provide or contribute towards the additional requirement being provided to an agreed delivery programme.

In certain circumstances where proven necessary and viable, the LPA may require that infrastructure is delivered ahead of the development being occupied.

Detailed specifications of the site-specific contributions required will be included in the site allocation policies.

Development proposals should seek to make provision for all the land required to accommodate any additional infrastructure arising from that development that needs to be accommodated on site.

Planning Agreements (Section 106 of the Town and Country Planning Act, 1990) will be used to provide a range of site-specific mitigation, including any potential cumulative effects, in accordance with the Section 106

⁷ Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date accessed: 17/10/24]

Draft Policy Direction 5: Infrastructure requirements and delivery

tests, which will normally be provided on site but may where appropriate be provided in an off-site location or via an in-lieu financial contribution.

In some cases, separate agreements with utility providers may be required. Where necessary S278 agreements will be used to secure mitigation in connection with existing highways.

The Community Infrastructure Levy (CIL) will continue to be used, with each district maintaining its own CIL charging schedule to secure contributions to help fund the strategic infrastructure needed to support the sustainable growth proposed in South Warwickshire set out in the Infrastructure Delivery Plan and Infrastructure Funding Statements. CIL rates will be reviewed to reflect the position of Stratford on Avon District Council and Warwick District Council and latest changes in development costs and land/floorspace values across the two districts in line with viability evidence.

Infrastructure schemes that are brought forward by service providers will be encouraged and supported, where they are in accordance with other policies in the Local Plan. New residential and commercial development will be supported if sufficient infrastructure capacity is either available or can be provided in time to serve it and proposals are in accordance with other policies in the Local Plan.

In planning for new development, appropriate regard will be given to existing deficiencies in services and infrastructure provision and the extent to which new development will impact on these. Development proposals must demonstrate that existing deficiencies have been taken into account when determining the infrastructure requirements for the new development. The provision of infrastructure should be linked directly to the phasing of development to ensure that infrastructure is provided in a timely and comprehensive manner to support new development.

Where an applicant advises that a proposal is unviable in light of the infrastructure requirement(s), open book calculations verified by an independent consultant approved by the council will need to be provided by the applicant and be submitted to the LPA for its consideration.

The Council will support enhancements to public transport and opportunities for modal shift, including new park and ride facilities (which will be identified in the Local Plan) and enhancements to the rail network, including improvements to services from Stratford-upon-Avon and services from Coventry to Leamington, including dualling of the railway line and a new rail stop at University of Warwick, where practical and viable. Enhancements to services on the rail corridor from Warwick / Royal Leamington Spa to Nuneaton via Coventry (the Elephant and Bear Line, previously known as NUCKLE), will also be supported.

The Councils will support opportunities for active travel, including the enhancement and extension of existing routes and the restoration of HS2 haul routes for this purpose, where it is appropriate.

Schemes and initiatives that address local issues, such as flood risk attenuation, community transport, road safety, parking, congestion and air quality will be supported subject to assessment.

The Councils will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained, for example in relation to upgrades to the rail network and upgrades to the A45 corridor and junctions along the M40 and M42.

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

- E.3.5.1 Policy Direction 5 sets out the Councils' intention to ensure that sufficient and appropriate infrastructure is provided to support the planned growth through the SWLP in a sustainable manner. The emerging Infrastructure Delivery Plan (IDP) will identify key infrastructure necessary to deliver the vision of the SWLP and ensure mechanisms are in place to plan, fund and deliver infrastructure across the Plan period, ensuring that the timing and phasing of such provisions are considered to ensure the developments are viable.
- E.3.5.2 The policy direction explains that the Community Infrastructure Levy (CIL) will continue to be used to secure financial contributions towards infrastructure requirements, and that the CIL will be reviewed to ensure its applicability across both districts within South Warwickshire.
- E.3.5.3 It is anticipated that the IDP and CIL will ensure that infrastructure requirements alongside new development are catered for, including healthcare, sports, education, social and community facilities, emergency services, flood management and climate resilience, biodiversity, utilities and transport. In particular, the policy direction emphasises a number of sustainable transport enhancements that will be identified or supported through the SWLP, including improvements to public transport services, new park and ride facilities, and extensions to active travel routes. The policy direction could help to ensure that new and existing residents are served by suitable infrastructure and are located in areas with good access to essential services and facilities. Therefore, there is potential for a major positive impact on transport and accessibility (SA Objective 11) and minor positive impacts on SA Objectives 1, 2, 3, 6, 7, 8, 12 and 13.

E.3.6 Policy Direction 6: Safeguarding land for transport proposals

Draft Policy Direction 6: Safeguarding land for transport proposals

At this stage, the Preferred Approach is to carry forward existing safeguarding measures identified in the Adopted Local Plans, where they relate to schemes that have not yet been implemented or completed. These may be amended as the evidence base is developed or supplemented by any additional measures that are identified through further work and consideration of reasonable alternatives. A revised policy would be subject to consultation at Regulation 19 stage.

Development within the areas safeguarded for the following transport infrastructure highlighted in Figure 9 will not be permitted where it could inhibit the effective delivery of the infrastructure. The below list represents an indicative schedule of protected schemes required to assist with the delivery of the overall spatial growth strategy for South Warwickshire Local Plan but this will be confirmed through consideration of any reasonable alternatives and transport modelling:

Stratford-on-Avon District

- Road improvements associated with the A46 within Stratford-on-Avon District at:
 - Junction of A46 and A422 Alcester Road (Wildmoor)
 - Junction of A46 and A3400 Birmingham Road (Bishopton)
- M42 Widening – land either side of Junction 3a to help reduce congestion where the M40 joins the M42
- Portabello Crossroads – improvements to this junction between the A429 Fosse Way and the B4035 to the west of Shipston-on-Stour
- Stratford to Honeybourne former railway – safeguarding the route of the former railway south of Stratford-upon-Avon to Honeybourne to facilitate re-opening
- Western Road to Birmingham Road, Stratford-upon-Avon – proposal for new crossing of the canal and creation of a new route between the A3400 Birmingham Road and A422 Alcester Road
- Bridgeway Gyratory Improvements – widening of key town centre route that takes traffic from town centre/A439 onto the Clopton Bridge and south across the River Avon
- West of Shottery Relief Road – currently under construction as part of the West of Shottery development connecting B439 Evesham Road with the A46 at Wildmoor

Draft Policy Direction 6: Safeguarding land for transport proposals

- Stratford South Western Relief Road – a third crossing of the River Avon to the south-west of Stratford-upon-Avon, connecting A3400 Shipston Road with B439 Evesham Road (alternative routes and options to be investigated).
- Land safeguarded for the possible provision of a railway station at Long Marston Airfield site, adjacent to the former Stratford to Honeybourne line.

The Site Allocations Plan also proposes to safeguard land at the Bishopton and Wildmoor junctions to facilitate improvements to the A46 should they be deemed necessary and further consideration will be given to these and any other reasonable alternative.

Warwick District

- Broad Locations for Park & Ride facilities to serve commuters travelling into Coventry and the Warwick / Leamington / Kenilworth areas including:
 - A Public Transport Interchange to serve Coventry South and the University of Warwick (including provision for Park and Ride and associated bus services, an active travel hub, very light rail and a new heavy rail station); and
 - A Park and Ride facility to serve the north of Leamington Spa (two areas of search are currently allocated on land near Bericote roundabout and Blackdown roundabout).
- Safeguarding of land to deliver transport schemes to alleviate congestion and address deficiencies in sustainable transport provision in specific locations (e.g. potential delivery of a multimodal transport corridor to alleviate local road congestion and deliver modal shift in the south of Coventry area).

A proposed policy direction is to include the safeguarding of land to facilitate widening of rail corridors (e.g. to 'double track' the section of line between Coventry and Leamington).

Both Districts

The Secretary of State for Transport issued revised safeguarding directions in relation to HS2 on 16 August 2016. It is not intended to reflect these on the policies maps but they can be viewed here:

https://www.gov.uk/government/publications/hs2-phase-2b-safeguarding-maps-warwickshire-staffordshire-leicestershire_

Further land may be required for safeguarding where this can be justified, for example where latest Infrastructure Delivery Plans provide a more up-to-date list of programmed transport schemes.

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

E.3.6.1 Policy Direction 6 seeks to ensure that land will be safeguarded to allow for the delivery of transport infrastructure that will be required to support current and future development. The policy direction outlines road junction improvements, relief roads, a new park and ride facility and a potential new railway station as an indication of current transport schemes in consideration.

- E.3.6.2 The policy direction will demonstrate compliance with the NPPF⁸, which states in paragraph 109 that “*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that ... the potential impacts of development on transport networks can be addressed*” and “*opportunities to promote walking, cycling and public transport use are identified and pursued*”.
- E.3.6.3 The policy direction highlights a number of public transport initiatives, including new park and ride facilities and the potential to re-open or create new railway lines to increase capacity and potentially encourage greater uptake of more sustainable transport modes.
- E.3.6.4 Allowing for the provision of an integrated and well planned transport network that will address congestion issues and improve the provision and connectivity of public transport and active travel options is likely to result in a major positive impact for sustainable transport (SA Objective 11). Secondary benefits will also be likely in terms of reduced transport-associated GHG emissions (SA Objective 1) and other air pollutants including NO₂ and particulate matter (SA Objective 6). Improved air quality, as well as potentially increased uptake of active travel, will be likely to result in a minor positive impact on health and wellbeing (SA Objective 10).

E.3.7 Policy Direction 7: Green Belt

Draft Policy Direction 7: Green Belt

The SWLP will apply national planning policy to proposals within the Green Belt.

Section 4.1 of this document sets out that after utilising suitable urban brownfield sites, there are 24 identified potential strategic growth locations outside of urban areas. These 24 locations include a mixture of Green Belt and non-Green Belt locations. Similarly, the 12 new settlement locations (section 4.2) include a mixture of Green Belt and non-Green Belt locations.

The SWLP will take a sequential approach to allocating strategic areas of growth and new settlements. Further evidence will be gathered on the relative sustainability of each of these areas. Some of this evidence will come from the Stage 2 Green Belt review, regarding the contribution an area makes to Green Belt purposes, and the impact on the wider Green Belt if an area was to be released. This additional evidence will enable a considered assessment of whether there are sufficient sustainable non-Green Belt locations to accommodate South Warwickshire’s housing and employment land needs. If so, then there will be no requirement to release land from the Green Belt. However, if there are clear sustainability benefits to utilising one or more Green Belt locations, then this will form the basis of an argument that “exceptional circumstances” exist to justify releasing that land from the Green Belt.

The SWLP will review those villages which are “washed over” by Green Belt designation, and consider whether there is justification for “insetting” any of these villages – i.e. removing the built up area of the village from the Green Belt designation.

The SWLP will also consider whether the Spatial Growth Strategy’s patterns of development result in a justification for any new Green Belt. The SWLP will also need to consider whether any areas of safeguarded land should be identified in order to meet longer-term development needs beyond the plan period. Areas of existing safeguarded land such as the land at Westwood Heath designated in the adopted Warwick District Local Plan will also need to be revisited to determine whether they are suitable for development, based on the latest available evidence.

⁸ MHCLG (2024) National Planning Policy Framework. December 2024. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cadc3476e/NPPF-December-2024.pdf> [Date accessed: 18/12/24]

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

- E.3.7.1 In South Warwickshire, a large proportion of Warwick District (c.71%) and a section in the north west of Stratford-on-Avon District (c.23%) lie within the West Midlands Green Belt. Policy Direction 7 sets out the intention to consider whether any exceptional circumstances existing to releasing areas of South Warwickshire’s Green Belt for development, in line with the NPPF⁹, only where this would provide clear sustainability benefits and insufficient non-Green Belt locations to deliver the required growth.
- E.3.7.2 Through the policy direction, the Councils seek to maintain the openness and permanence of the Green Belt, which will help to prevent coalescence between settlements and avoid inappropriate development in these locations. Although Green Belt is not a reflection of the environmental quality or value of the land, preserving this role of the Green Belt will be likely to contribute towards the conservation of landscape character in these areas, potentially leading to a minor positive impact on the landscape (SA Objective 4).
- E.3.7.3 The policy supports the exploration of potential development sites for housing or employment uses in the Green Belt, setting out the intention to identify a range of sustainable locations for development to contribute towards identified needs, which may lead to a minor positive impact on housing provision and the economy (SA Objectives 9 and 13).
- E.3.7.4 The South Warwickshire Councils have commissioned a Green Belt Review to form part of the evidence base for the emerging SWLP. Stage 1 of the Review includes an assessment of parcels and broad areas of Green Belt land within the Plan area to determine their contribution to the five purposes of the Green Belt, and provided commentary on relative strategic impacts of Green Belt release. It is anticipated that a second stage of the Green Belt Review will be undertaken to identify poorly performing areas of Green Belt that may be released for development, providing a more detailed site-specific assessment than the Stage 1 Review.
- E.3.7.5 It is recommended that the policy direction is updated as the plan making process progresses and more evidence becomes available, to clearly set out the types and scales of development that will be considered appropriate within the Green Belt. The policy should also outline any compensatory provisions that will be required following any Green Belt release, to ensure that the retained Green Belt provides enhanced recreational and biodiversity value, for example.

⁹ MHCLG (2024) National Planning Policy Framework. December 2024. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cadc3476e/NPPF-December-2024.pdf> [Date accessed: 18/12/24]

E.3.7.6 The policy direction should also take into account changes to national policy, for example in relation to identification of ‘Grey Belt’ areas, drawing on the government’s updated NPPF¹⁰. This should include consideration of releasing Grey Belt land for development, comprised of previously developed land, or land which does not strongly contribute to the purposes of the Green Belt.

E.3.8 Policy Direction 8: Density

Draft Policy Direction 8: Density

Appropriate density ranges for different types and locations of development will be indicated in design codes. See section 8.2 for more details.

The SWLP will identify particular areas that would be more suited to higher density development through densification.

A Design Code will be created which will enable high quality densification development that respects and enhances the existing neighbourhood character.

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

E.3.8.1 Policy Direction 8 will identify areas within the SWLP area that are suitable for higher density development and through an emerging Design Code will guide development proposals of higher density. Pursuing increased housing densities in appropriate areas will help the Councils to provide more housing across the Plan area, and as such, lead to a minor positive impact on housing (SA Objective 9).

E.3.8.2 Higher density development will be expected to make more efficient use of land and minimise the loss of undeveloped land and soils elsewhere in the Plan area for new development, potentially resulting in a minor positive impact on natural resources (SA Objective 7).

¹⁰ MHCLG (2024) National Planning Policy Framework. December 2024. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cadc3476e/NPPF-December-2024.pdf> [Date accessed: 18/12/24]

E.3.8.3 Higher density development could also prevent urban sprawl, protecting the wider landscape setting. It is recommended that the policy includes wording to ensure that appropriate densities will be sought in accordance with the surrounding landscape character and that measures will be in place to ensure that high-density development will not result in adverse impacts on surrounding historic environment, allowing net density on a site to go below the minimum density where necessary to avoid or mitigate adverse impacts on the surrounding landscape, heritage assets or their setting. Any potential development of tall buildings should be informed by a Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA). At this stage of the plan making process, a negligible impact on the local landscape and historic environment is identified (SA Objectives 4 and 9).

E.3.9 Policy Direction 9: Using brownfield land for development

Draft Policy Direction 9: Using brownfield land for development

The SWLP Spatial Growth Strategy will make full use of suitable urban brownfield land before development is considered in other locations.

Where available brownfield land is located outside of urban areas, decisions on its use will have reference to the sustainability of the location, with regard to the Spatial Growth Strategy priority areas 1-3; and/or whether its use would increase the sustainability of the area as part of a large-scale development such as a new settlement.

Where brownfield land is not considered to be in a sustainable location for residential or employment uses, consideration will be given to other potential beneficial uses. For example, environmental, leisure or agricultural uses.

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

E.3.9.1 Policy Direction 9 outlines the Councils’ approach to utilising brownfield land throughout the Plan area. Utilising brownfield land for development will be expected to make efficient use of land and minimise the loss of undeveloped land and soils elsewhere in the Plan area for new development. A minor positive impact on natural resources could be expected (SA Objective 7).

E.3.9.2 Utilising brownfield land could help to preserve undeveloped land throughout the Plan area outside of existing settlement boundaries, thereby conserving the local landscape character and potentially leading to a minor positive impact on the local landscape (SA Objective 4). Furthermore, encouraging brownfield development will help to locate development within existing urban areas, which will be expected to relate to areas supported by existing local services and facilities, as such reducing the need to travel and dependency on private car use. A minor positive impact on sustainable travel is identified (SA Objective 11).

E.3.9.3 Encouraging re-use of previously undeveloped or brownfield land within urban areas may also help to protect ecological networks in the wider countryside; however, urban locations can still support important habitats and corridors for biodiversity, including those recognised by Natural England’s open mosaic habitat data¹¹. It is recommended the policy provides further explanation on what other “*environmental, leisure or agricultural*” uses could consist of, including measures to identify and conserve any existing value on brownfield sites.

¹¹ Natural England (2022) Open Mosaic Habitat. Available at: <https://naturalengland-defra.opendata.arcgis.com/datasets/open-mosaic-habitat-draft/about> [Date accessed: 06/11/24]

E.4 Delivering homes that meet the needs of all our communities

E.4.1 Policy Direction 10: Providing the right tenure and type of homes

Draft Policy Direction 10: Providing the right tenure and type of homes

The councils will have regard to the latest evidence in drafting policies relating to housing tenure and type.

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

E.4.1.1 Policy Direction 10 sets out the intention to prepare a SWLP policy to ensure that a range of houses are provided to meet the needs of the community and provide housing choice, including affordable homes and housing for older people. Through providing an appropriate mixture of tenure and type of homes, in line with evidenced needs, minor positive impacts on housing provision could be expected (SA Objective 9).

E.4.2 Policy A: Providing the right size of homes

Draft Policy A: Providing the right size of homes

Amenity Standards

All new residential development, including dwellings created through the subdivision of existing dwellings or conversion, will comply with Nationally Described Space Standards (NDSS), or any subsequent government space standard. [Technical housing standards – nationally described space standard \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

All 1 and 2 bed affordable homes must be built with bedrooms capable of satisfactorily accommodating 2 occupiers in each bedroom (i.e. double or twin bedrooms) unless exceptional justification is advanced as part of a planning application.

Accessible Living Standards

All new residential development, including dwellings created through the subdivision of existing dwellings or conversion, must be designed to be accessible and adaptable in accordance with technical standard M4(2) of the Building Regulations (or as updated).

On new build sites of 10 dwellings or more, at least 10% of market dwellings, and at least 25% of affordable dwellings, should be designed to be wheelchair user friendly dwellings in accordance with technical standard M4(3) of the Building Regulations (or as updated).

Development Management Considerations

Only in circumstances where it can be robustly demonstrated by the applicant that it is not practicable and financially viable to deliver the provisions or where the requirements are clearly incompatible with conserving and enhancing historic character, will new development be exempt from this policy requirement.

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

E.4.2.1 Policy A will ensure that new residential development will be of the right size to accommodate residents and meet amenity standards and be accessible to accommodate those with specific needs. The policy will be likely to have a minor positive impact on housing including specialist accommodation provision and ensuring affordable housing is suitable for families (SA Objective 9).

E.4.2.2 The policy is also expected to result in a minor positive impact on the health and wellbeing of residents (SA Objective 10), where the policy will be likely to help support a more inclusive, accessible and adaptable housing stock.

E.4.3 Policy B: Providing custom and self building housing plots

Draft Policy B: Providing custom and self building housing plots

Overall Principles

Self-build and custom-build housing will be supported in the following scenarios:

- As a requirement to provide serviced plots as part of large housing sites.
- Sites allocated for this purpose (small allocations).
- On unallocated sites in accordance with Part C of this Policy.

Required Provision on Large Housing Sites:

Within all large developments (100 or more dwellings):

- 5% of the developable area of a site is to be made available for the provision of self-build and custom-build homes.
- The allocated plots are to be provided at a range of costs, sizes, and types, in accordance with the latest identified local need.

Self-Build and Custom Housebuilding sites are intended to help meet a specific form of identified housing need. Applications for schemes that provide for general market housing on such sites will not be supported.

**Yield based on a net site area of 0.5 hectares @ 20 dwellings per hectare*

Unallocated Self-Build and Custom Build Housing Sites

Proposals solely for self-build and/or custom-build housing will be supported in principle in the following locations subject to the following criteria:

- As individual and small groups of plots within defined settlement boundaries.
- On suitable sites adjacent to defined settlement boundaries to meet a district-wide need.
- Suitable sites within the Green Belt or Cotswolds National Landscape and adjacent to defined settlement boundaries would only be supported to meet a local need identified by the local community.
- On suitable sites within and adjacent to a defined settlement boundary to meet an identified local need by the local community.

Developments should be small-scale and appropriate to the size and character of the settlement where the site is located.

General

Where in-principle support is conditional on meeting a district-wide need, planning applications will be required to include evidence regarding the demand for and supply of self-build and custom-build dwellings.

Draft Policy B: Providing custom and self building housing plots

Where in-principle support is conditional on meeting a local need identified by the local community, planning applications will be required to demonstrate community support and need through a housing needs survey.

All schemes comprising multiple plots will be subject to a legal agreement requiring:

- All plots to be offered in the first instance to individuals or households that have a local connection through living and/or working in South Warwickshire or by having close family living in South Warwickshire.
- A marketing strategy which specifies the minimum length of time for advertising plots and the appropriate means of doing so.
- An independent valuation of each plot taking into account the specific restrictions that apply to such schemes.
- Each plot to be fully serviced by the site developer prior to first occupation of the development.
- Any other matters that are deemed appropriate by the relevant District Council e.g. through an SPD, and those introduced by national legislation.

Development Management considerations

General

A design code will need to be agreed with the relevant South Warwickshire Council. It will need to be followed for each plot and individual plot passports will also be required.

If the plots are robustly marketed and there is no sale of these plots after 12 months at a reasonable price, or another period if mutually agreed between the relevant Council and developer, then dwellings may be built and brought forward for open market housing.

Integrating Self-Build and Custom-Build housing plots

On sites providing self-build and/or custom-build housing alongside other housing, schemes should also meet the following criteria:

- Provision of plots in small clusters (usually between 5-10 plots) and not as individual plots throughout a site so as to prevent an inharmonious street scene.
- Submission of a phasing plan to ensure CIL is not triggered for the self-build dwellings due to commencement of construction elsewhere on the site.

While the initial permission is likely to be outline, individual plots would come forward for reserved matters approval to allow each one to be separate chargeable development for the purposes of the Community Infrastructure Levy.

Site specific considerations

As well as all self-build and custom housebuilding schemes being expected to satisfy the provisions of national and local planning policy regarding environmental and technical matters, the following will be addressed:

- Scale of the proposed development in relation to the size and character of the settlement involved and relationship of the site to it.
- Proposed density of the proposal in relation to the character and setting.
- Design characteristics that have been used to define the character of the development.
- Treatment of highways, drives and paths, including all internal roads and shared private drives.
- Relationship of dwellings to adjacent road frontage, including boundary treatment.
- Identification of all open spaces outside plots and how they are intended to be managed and maintained.
- Identification of all structural landscaping outside plots and how it is intended to be managed and maintained.

In the case of outline planning applications for schemes involving multiple plots, all matters relating to the development that lie outside individual plots should be covered at that stage and not through a reserved matters application. This includes access, roads and footways, drainage, landscaping and open space, together with arrangements for their maintenance.

The production of a Construction Management Plan for an individual site will be considered, in collaboration between the applicant, the relevant Council and the local community.

For schemes comprising over ten plots, the development should be implemented in two or more phases to ensure that the marketing of plots and the impact of construction are managed in an appropriate manner.

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

E.4.3.1 Policy B seeks to ensure that homes in the Plan area provide opportunities for self-build and custom homes. The policy aims to secure 5% of the developable area of major developments of 100 dwellings or more to be available for self-build or custom homes. These measures will be likely to ensure that new housing delivered across the SWLP area can accommodate the diverse requirements of residents, particularly for local communities, leading to a minor positive impact on housing (SA Objective 9).

E.4.3.2 Encouraging a proportion of self-build homes can also lead to benefits for the local economy, where individuals are likely to employ local businesses. A minor positive impact on the economy (SA Objective 13) could therefore be seen.

E.4.3.3 The policy sets out the Councils support for small plots within defined settlement boundaries, or on other suitable sites including within the Green Belt or Cotswolds National Landscape where there is an identified local need. The policy also outlines site specific considerations which includes development to be of appropriate density and scale in relation to character and setting of existing settlements, consider open spaces and how these can be managed and maintained, appropriate design characteristics and ensure development considers surrounding roads, footpaths and driveways. These requirements could help to protect the local character of the area and also ensure development is accessible and does not impact surrounding roads or footpaths. Overall, a minor positive impact on the local landscape and accessibility could be expected (SA Objectives 4 and 11).

E.4.3.4 The site specific considerations discussed within the policy could also provide secondary benefits to local heritage assets and their settings within South Warwickshire’s historic settlements. It is recommended that the policy includes specific wording to ensure the historic environment is considered throughout the SWLP. At this stage, a negligible impact on cultural heritage is identified (SA Objective 5).

E.4.4 Policy Direction 11: Meeting the accommodation needs of Gypsies, Travellers, Traveling Showpeople and Boat Dwellers

Draft Policy Direction 11: Meeting the accommodation needs of Gypsies, Travellers, Traveling Showpeople and Boat Dwellers

To maintain an appropriate supply of sites to meet the accommodation needs of Gypsy, Traveller, Travelling Showpeople and Boat Dwellers as identified in the Accommodation Assessment the following Policy approaches are considered appropriate.

Policies will be set that: -

Safeguard all existing, authorised permanent Gypsy and Traveller sites and Travelling Showpeople Yards. In doing so, this will ensure that these locations are protected and not lost to other purposes over time. Proposals for an alternative use of a safeguarded site or yard should only be considered, if as part of any such

Draft Policy Direction 11: Meeting the accommodation needs of Gypsies, Travellers, Traveling Showpeople and Boat Dwellers

proposal an alternative replacement site or yard has been identified and developed to provide facilities of an equivalent or improved standard (including its location).

Protect New Sites and Yards. All new lawful Gypsy, Traveller and Travelling Showpeople sites and yards, or any extensions to lawful sites and yards shall also be safeguarded.

Provide for Future Gypsy, Traveller and Travelling Showpeople accommodation need. The Local Plan will require the provision of pitches and plots on large scale development sites (of over 500 homes) to meet the identified need as set out in the latest GTAA accommodation assessment (or any subsequent update). In doing so, this will enable the provision of Gypsy and Traveller accommodation at sustainable locations with good access to a range of facilities. This approach will require appropriate developments to incorporate small-scale traveller sites. It is believed that small scale sites will better integrate with emerging localities and communities. In conjunction with this approach, consideration will be given to the potential re- use of the Leamington Football Club site at Harbury Lane, Leamington Spa for Gypsy and Traveller site needs (subject to the future re-location of the Football Club and the availability of the current site).

A criterion-based policy will be provided for the assessment of applications and any possible applications that may come forward on non-allocated sites. This policy will require the consideration of the following matters: -

That sites are sustainable economically, socially and environmentally, have appropriate access to schools and health services and provide a settled base that reduces the need for long distance travel.

Transit Provision In order to best address the need to provide for transient and or visiting gypsy and traveller encampments the councils will be considering the implementation of a negotiated stopping places policy approach. This will involve caravans being allowed to alight on suitable pieces of ground where the encampment does not cause any danger, problems or nuisance to its occupants or the local community for an agreed and limited period. This may also involve assisting the families with the provision of services such as water, waste disposal and toilets. In conjunction with this approach, the provision of transit sites may also be a consideration. The adoption of this approach may require liaison with other key stakeholders (e.g. Warwickshire County Council: Warwickshire Police).

Boat Dwellers The Accommodation Assessment Study identifies a need for an additional 35 residential boat moorings over the plan period. The local planning authorities will work with other organisations (local boat yards and the Canal and Rivers Trust) to deliver the necessary additional capacity.

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

E.4.4.1 In accordance with the planning policy for traveller sites¹², Gypsies and Travellers are defined as *“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”*.

¹² MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 24/10/24]

- E.4.4.2 Travelling Showpeople are defined as *“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”*¹³.
- E.4.4.3 Boat dwellers are defined as *“dwellers who rent, or in some cases own, a residential mooring”*¹⁴.
- E.4.4.4 Policy Direction 11 is expected to ensure the sufficient provision of high-quality pitches and plots for the Gypsy, Traveller and Travelling Showpeople community and moorings for boat dwellers within the SWLP area. Therefore, the policy is identified to have a minor positive impact on housing provision (SA Objective 9).
- E.4.4.5 The policy also ensures that sites for this use are in economically, socially and environmentally sustainable locations, that provide access to schools, healthcare services, reduce the need for long distance travel and provide services such as water and waste disposal. As such, minor positive impacts could be expected for waste, health, transport and education (SA Objectives 8, 10, 11 and 13).
- E.4.4.6 The policy also states that there is potential for re-use of the Leamington Football Club site at Harbury Lane. This site has been evaluated in the SA process, with the full assessment presented in **Appendix D**. Any further reasonable alternative sites for Gypsy, Traveller or Travelling Showpeople use that come forward will be evaluated in the SA process.

¹³ Ibid

¹⁴ National Barge Travellers Association (2019). Best Practice Guide for Boat Dweller Accommodation Needs Assessments under Section 124 of the Housing and Planning Act 2016. Available at: https://www.bargee-traveller.org.uk/wp-content/uploads/2019/03/2019-03-12_V7_NBTA_Best_Practice_Guide_Boat_Dweller_Acommodation_Needs_Assessments_S124_HPA2016.pdf [Date accessed: 24/10/24]

E.5 Delivering South Warwickshire's economic needs

E.5.1 Policy Direction 12: Locations for employment growth

Draft Policy Direction 12: Locations for employment growth

The SWLP will allocate sites to meet the employment need set out in Policy Direction 12. Specific sites for allocation will be identified in the Reg.19 publication version of the SWLP. It is proposed that employment uses to meet this need will be broadly located in the following locations, although further work will be completed before specific allocations are proposed:

Strategic Sites

- The WMSESS (2024) recommends that 75-125ha of land be allocated along the M40/A46 corridor in South Warwickshire for strategic uses (B2/B8 class uses). As per Section 4.1, we propose to plan for the upper limit of this (125ha) as recommended by the WMSESS (2024), and due to the fact the WMSESS (2024) only forecasts need up to 2045, whilst the SWLP will plan for need up to 2050.
- There are two principal potential strategic employment site locations identified in the South Warwickshire Employment Land Study (2024) that could meet the strategic need set out in the WMSESS (2024):
 - The first potential strategic site is to the south of Leamington, where **Land at Red House Farm**, a 121ha. site, offers the opportunity to provide a strategic site that could potentially help to fund and deliver a new junction to replace the two one way junctions at J13 and J14 of the M40. Appropriate use classes could include E(g)(iii), B2 and B8 uses. This site falls outside of the Green Belt and would relate well spatially both to the existing urban areas and the M40. However there are questions regarding its deliverability, delivery timescales and impact on coalescence of settlements.
 - The second potential strategic opportunity is **Wedgnock Park Farm**, a 141ha. site located to the west of Warwick, accessing the M40 at J15 via the A46. Appropriate use class could include E(g), B2 and B8 uses. This falls within the Green Belt and the SWELS (2024) notes that this might be more suitable if the broader strategy of growth is focused west of Warwick/Leamington, noting for instance the proposals put forward for strategic growth around Hatton Station. This option could be delivered in the medium-term compared to the long-term delivery of a new junction that is required for south of Leamington strategy.

Additionally, it is proposed for the existing 100ha. JLR allocation at Gaydon (Proposal GLH in the SDC Core Strategy) to be released to the wider market for strategic manufacturing (Use Class B2 use) uses and small-scale logistics (Use Class B8) units. Logistics units greater than 9,300 sq.m should be prevented on the site so that it stands as a strategic B2 manufacturing site on a well-located junction. We will liaise with JLR to identify an alternative site(s) in the Gaydon area to meet their employment needs (see Section 6.3).

These three potential strategic sites combined would meet and indeed exceed the overarching need for 125ha of strategic sites in South Warwickshire identified by the WMSESS (2024).

We are including all three sites for consideration at this stage of the Local Plan process in order to seek feedback through this consultation process. However, it is likely that not all of these sites will ultimately need to be allocated, and it is probable that only one site within Warwick District (Red House Farm or Wedgnock Park Farm), along with the reallocation of the existing 100ha. JLR site in Stratford-on-Avon District, will be taken forward for allocation in the SWLP. Further work will be done prior to the next (Reg. 19) stage of the SWLP to help determine the sites put forward for allocation.

Proposals for unallocated employment development will be directed to the main South Warwickshire settlements in the first instance. However, it is recognised that, in accordance with the NPPF, sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances, development will be required to meet the criteria set out in Section 6.6 (Supporting Rural Employment) and the NPPF 2024 (paragraph 89).

The use of previously developed land, and sites that are physically well-related to existing settlements, will be encouraged where suitable opportunities exist.

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

E.5.1.1 Policy Direction 12 outlines the proposed location of strategic and non-strategic employment growth within the Plan area to meet the identified employment need as set out in Policy Direction 1. The policy will be likely to provide a range of employment opportunities to current and future residents across the SWLP area, increasing access to employment and supporting a range of economic sectors. Overall, a major positive impact on the economy is identified (SA Objective 13).

E.5.1.2 The policy direction outlines that employment development will firstly be directed to main settlements within South Warwickshire and some growth may therefore be located in areas well served by existing sustainable transport options. However, the significant levels of new economic development proposed will also be expected to increase traffic flows, potentially increasing congestion and air pollution from vehicle emissions especially associated with any logistics or manufacturing uses that are likely to increase flows of include heavy good vehicles (HGVs). Depending on the specific employment uses to be allocated through this policy, there may also be an increase in air or water pollution arising from the new development sites themselves, and an increase in commercial/industrial waste. A minor negative impact is identified for climate change, pollution, waste and accessibility (SA Objective 1, 6, 8 and 11). It is recommended that the policy includes wording to outline how employment development will incorporate energy efficient buildings, low-carbon and renewable technologies and integrate GI to reduce adverse effects, as well as ensuring the new employment sites provide active travel and public transport links for employees.

E.5.1.3 The policy direction states that development will firstly use previously developed land where possible, which presents an efficient use of land. However, the policy states that rural development is also likely, located beyond existing settlements. On balance, a negligible impact on natural resources is identified (SA Objective 7).

E.5.1.4 Specific sites have not been evaluated at this stage. Reasonable alternative sites for employment use, including those identified through the West Midlands Strategic Employment Sites Study (WMSESS), will be assessed in the SA process as part of the next plan making stage.

E.5.2 Policy Direction 13: Core Opportunity Area

Draft Policy Direction 13: Core Opportunity Area

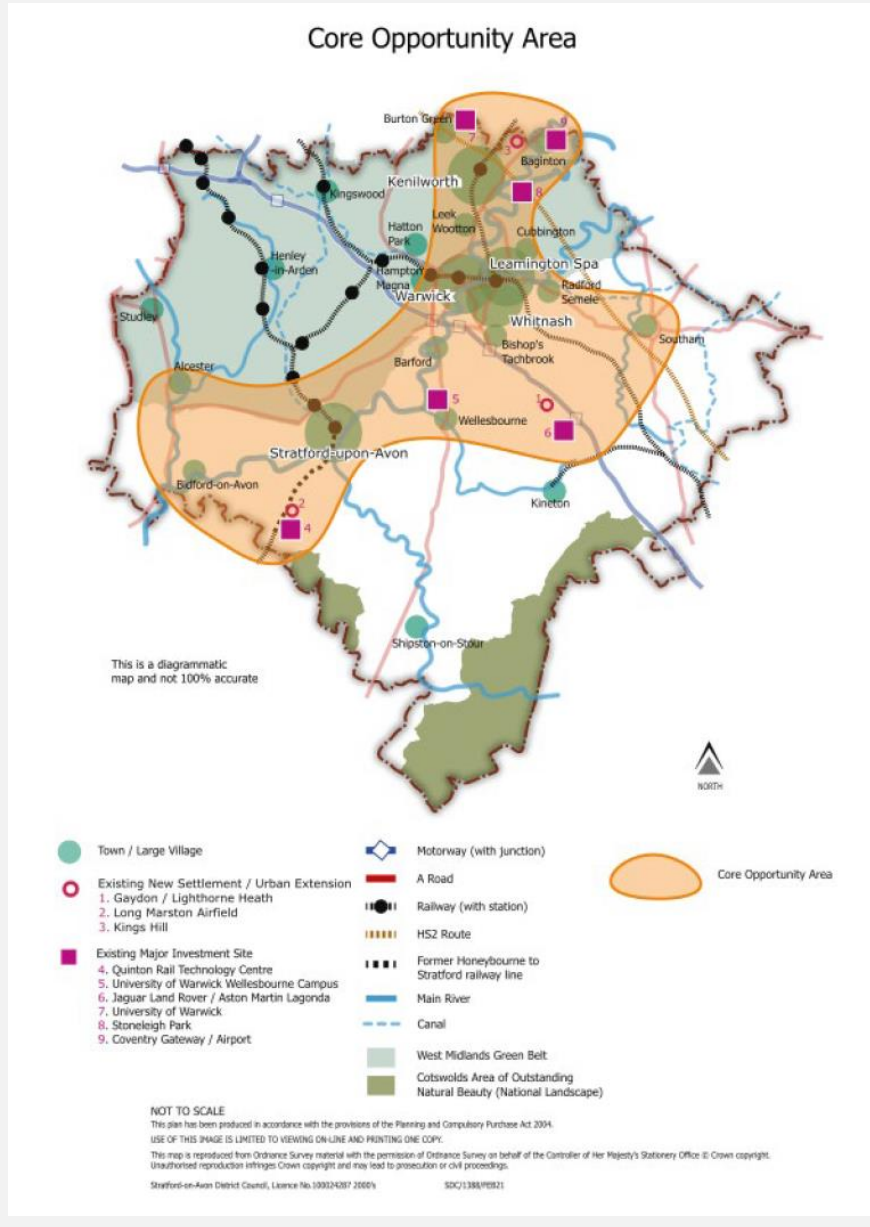
The Core Opportunity Area (as detailed on the Policies Map) will be the focus for new employment development in the South Warwickshire area. The COA will build on existing employment hubs, harness the potential offered by co-locating businesses and research facilities and support the strategy for attracting significant inward investment to the area. This will be against the backdrop of national planning policies, most notably those relating to the Green Belt.

Draft Policy Direction 13: Core Opportunity Area

Whilst the existing road network within the area currently plays a key role for car borne journeys and road freight, improvements to public transport and active travel measures within the COA will be prioritised, with the aim of creating capacity on the area’s roads.

Areas outside of the Core Opportunity Area remain suitable for more local investment opportunities, subject to compliance with other policies in the SWLP and the NPPF.

Figure 10: Core Opportunity Area



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

- E.5.2.1 Policy Direction 13 sets out the aims of the Core Opportunity Area (COA) and the role it will play in boosting economic growth within the SWLP area. The COA will build on existing employment hubs and co-locate businesses to attract investment, which can increase the pool of skilled workers within the area and increase employment opportunities. As such, a major positive impact on the local economy is identified (SA Objective 13).
- E.5.2.2 Focusing employment development within the COA will locate site end users with access to the existing road network and public transport infrastructure. Furthermore, the policy direction outlines that public transport and active travel measures within the COA will be enhanced and prioritised. A minor positive impact on accessibility is identified (SA Objective 11).
- E.5.2.3 Although the COA has been proposed to contain a range of existing major investment sites and main towns, it also extends across highly rural areas and open countryside particularly in Stratford-on-Avon District. The proposed development is likely to require a large quantity of land for development, which may include a proportion of the Plan area's BMV agricultural land. A minor negative impact on natural resources (SA Objective 7) cannot be ruled out.
- E.5.2.4 Whilst specific development sites are not identified in the policy direction, it is noted that the COA will be the focus for new development and growth. Increased economic activities could also lead to detrimental effects on flood risk, ecological networks that form vital habitats or corridors for biodiversity, landscape character and the settings of historic assets, particularly if growth extends outside of the main towns. Minor negative impacts cannot be ruled out for flood risk, the local landscape, cultural heritage and biodiversity (SA Objectives 2, 3, 4 and 5). Increased economic activities could potentially lead to a minor negative effects associated with increased GHG emissions and pollution (SA Objectives 1 and 6).

E.5.3 Policy Direction 14: Major investment sites (MIS)

Draft Policy Direction 14: Major Investment Sites (MIS)

The Major Investment Sites will be protected for employment uses, and will be the main focus of new employment development in the Plan period. The below sets out in broad terms the type of employment uses that would be considered to be acceptable in principle at these MIS. We are supportive of growth in principle in these locations, however the exact type and quantum of development to be allocated at each MIS will be determined in subsequent stages of the Local Plan process, and should be consistent with the relevant SPDs for the sites, where these are adopted.

- **MIS.1 - Gaydon – JLR/AML** – it is proposed to release the existing 100ha. JLR restricted allocation to allow general strategic manufacturing and small scale logistics uses (under 9,300 sqm), with the emphasis on strategic B2 manufacturing. Large-scale logistics (B8 class) uses will be resisted on this site. We will engage with JLR regarding alternative sites that may be suitable for their future development needs so that their requirements are met. The existing Aston Martin Lagonda (AML) 4.5ha. allocation in the adopted SDC Core Strategy may however be retained within the SWLP, subject to further discussion with AML on their future plans for the site.
- **MIS.2 - Long Marston Airfield** - Existing allocation Proposal LMA: Long Marston Airfield remains an important part of Stratford-on-Avon's employment land supply. It is expected that the SWLP may revise what is delivered on this site in some respect; therefore it is not proposed that this allocation is rolled forward in its existing form. If further strategic growth is brought forward in addition to the existing Proposal LMA allocation in the adopted SDC Core Strategy (see Section 4 – Growth of this document), it is considered that this should be accompanied by dedicated additional employment land provision; as well as provision of town centre uses, including offices, within a local centre.
- **MIS.3 - The Long Marston Rail Innovation Centre (Porterbrook)** will be safeguarded for rail-based employment and research and development and opportunities for intensification of site uses will be explored.

Draft Policy Direction 14: Major Investment Sites (MIS)

- **MIS.4 - South of Coventry area** – Coventry Airport will be allocated for a Gigafactory (ie. a facility to manufacture batteries for electric vehicles and a range of other applications at scale) as set out in Section 6.5(Airfields). In addition, the existing allocation of the Sub Regional Employment Site (land in the vicinity of Coventry Airport) under DS16 of the Warwick District Local Plan will be retained within the SWLP. There is also opportunity for further employment development here that could link to the automotive industry and the National Battery Industrialisation Centre, and could contribute to South Warwickshire or Coventry’s unmet need. This would be subject to consideration of greenbelt impact, residential strategy and infrastructure to provide sustainable access.
- **MIS.5 and MIS.6 - Stoneleigh Park and Stoneleigh Deer Park/Abbey Park** – Stoneleigh Park is a major employment site in the Green Belt with a focus on rural industries. Change at the site is necessitated by the proposed HS2 route cutting through the site. The site, owing to its low-level, low-density layout with large areas of open space doesn’t represent the most efficient use of the land. Therefore, further consideration ahead of the submission version of the Plan will be given to intensification of use on the site, the merits of potentially removing the site from the Green Belt, the merits of a greater diversification of uses on site and any potential expansion of the current site. There is potential to improve connectivity of the site including active travel opportunities to nearby Kenilworth and also to provide a new access to the site from the north, connecting with the improved A46 Stoneleigh Junction and thus providing better access to the strategic road network, whilst also reducing vehicle movements through the village of Stoneleigh.
- **MIS.7 - University of Warwick main campus** – the adopted Masterplan SPD will bring forward the development of further research and development premises and future development of this site should be in accordance with this SPD. Further development in the south of the site will be explored, but may require a link road from A46 depending on the nature of development due to access through a residential area.
- **MIS.8 and MIS.9 - Wellesbourne including University of Warwick Wellesbourne Campus and Wellesbourne Airfield** – it is proposed to expand the agri-tech cluster at the University of Warwick Innovation Campus to support spin-out businesses and expansion of employment provision at Wellesbourne Airfield (see Section 6.5 on Airfields). Development of the Wellesbourne Campus should be consistent with the adopted Masterplan SPD.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
14	-	-	-	-	-	-	-	0	0	0	0	+	++

E.5.3.1 Policy Direction 14 outlines the need to protect and support the accepted employment uses at Major Investment Sites (MIS), that are to be the main focus of new employment development over the Plan period. The policy will protect existing employment uses within the MISs and ensure that new development does not impact the operation and activities of employment uses at a site. This will help to increase the provision of employment land to allow for improved provision of job opportunities throughout the Plan area, as well as attracting investment, leading to a major positive impact on the economy (SA Objective 13).

E.5.3.2 This could potentially extend to skill development and training provision in the region, particularly if the MIS includes growth associated with the University of Warwick. A minor positive impact on education (SA Objective 12) is identified.

E.5.3.3 At this stage, specific development proposals are not set out but the policy direction supports further growth and investment within the MIS in general. A range of potential land uses will be supported, including logistics, research and rural industries. Increased economic activities across the MIS could also lead to detrimental effects on flood risk, ecological networks that form vital habitats or corridors for biodiversity, landscape character and the settings of historic assets, and agricultural land, particularly if growth extends outside of the existing footprint of development currently within the MIS. Minor negative impacts cannot be ruled out for flood risk, the local landscape, cultural heritage and biodiversity (SA Objectives 2, 3, 4, 5 and 7). Increased economic activities could potentially lead to a minor negative effects associated with increased GHG emissions and pollution (SA Objectives 1 and 6).

E.5.3.4 Reasonable alternative sites for employment use, including any proposed extensions or new development sites within MIS, will be assessed in the SA process as part of the next plan making stage.

E.5.4 Policy Direction 15: Provision of office accommodation and refurbishment of existing office stock

Draft Policy Direction 15: Provision of office accommodation and refurbishment of existing office stock

- Sites will be allocated in Warwick and Leamington Spa town centres for office use (E(g)(i) in order to meet the office need identified in Section 4.1 (Spatial Growth Strategy); in particular, to contribute towards the need for high quality office floorspace and the growth of the gaming cluster.
- No allocations for office development will be made in Stratford-on-Avon District, as the Employment Land Study did not identify a need for further office allocations to meet the minimal identified need in this area.
- Development proposals that involve the refurbishment of existing office stock that is of poor quality or underutilised, in order to provide enhanced and upgrade office accommodation, will be supported.
- The redevelopment and refurbishment of poor quality or underutilised out-of-town office spaces into smaller, flexible units to provide move-on space for businesses that have outgrown their premises will be supported, where this would provide a more effective use of the space.
- Development that seeks to provide a substantial element of affordable office space will be supported.
- Allocations specifically for affordable office space will be explored in the Reg.19 version of the SWLP, and we will explore commissioning further evidence as to how affordable office space could be secured prior to the Reg.19 consultation of the SWLP.

Policy Direction	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
15	0	0	0	0	0	0	+	0	0	0	0	0	+

E.5.4.1 Policy Direction 15 sets out the requirements for redevelopment of existing office stock and outlines how high quality office floorspace will be delivered throughout the Plan period in appropriate locations where there is evidenced demand. The policy will support the scale-up of businesses which have outgrown their premises, supporting business activity and increasing employment floorspace. A minor positive impact on the local economy is identified (SA Objective 13).

E.5.4.2 Furthermore, through supporting the refurbishment of existing office stock that is of poor quality or underused, the policy will help to reduce the overall land-take for new development, safeguarding undeveloped land; therefore, a minor positive impact on natural resources could be expected (SA Objective 7).

E.5.5 Policy Direction 16: Airfields

Draft Policy Direction 16: Airfields

The following Airfield sites are identified as potentially suitable for employment development as follows:

Wellesbourne Airfield

- It is proposed to safeguard the aviation function of the airfield inline with existing Area Policy AS.9 in the adopted Stratford-on-Avon District Core Strategy
- However, it is also proposed to partially repurpose the site to include an element of Use Class B2 (general industrial) and Use Class B8 (storage and distribution) employment floorspace as well as ancillary Use Class E(g) uses (office/research and development/light industrial). The site has been identified within the Employment Study (2024) as being a suitable extension to the existing industrial offering at Wellesbourne, and could be appropriate for E(g)/B2/B8 uses.

Atherstone Airfield

- This site is proposed to be released as an employment allocation as currently allocated within the SDC Core Strategy as Proposal SUA.4. This is as it is considered that development of this site would not accord with our Spatial Growth Strategy (see Section 4.1)

Coventry Airport

- The site already has planning permission for a Gigafactory. It is proposed to allocate this site for a Gigafactory (i.e. a facility to manufacture batteries for electric vehicles and a range of other applications at scale.) to ensure the delivery and protect the site for this purpose.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
16	+/-	0	0	0	0	+/-	+	0	0	0	0	0	+

E.5.5.1 Policy Direction 16 outlines the airfields within the Plan area which are potentially suitable for redevelopment as employment sites supporting a range of use classes. The proposed development within these areas will help to meet the identified employment needs over the Plan period, and a minor positive impact on the economy is likely (SA Objective 13).

E.5.5.2 By supporting redevelopment of brownfield land across these airfields, a minor positive impact on the efficient use of natural resources could be seen (SA Objective 7).

E.5.5.3 It is uncertain to what extent the aviation functions of the current airfields will change as a result of the proposed development, other than Wellesbourne which is likely to be safeguarded. Reduced air traffic will be likely to reduce local GHG emissions; however, increased employment activities may counter-act this. Coventry Airport is proposed for a gigafactory to produce batteries for electric vehicles, which will contribute to wider positive effects on reduced vehicle emissions but in itself may increase the risks of chemical pollution. The overall effect of the policy on climate change and pollution is uncertain without further detail on the specific developments (SA Objectives 1 and 6).

E.5.5.4 Specific sites have not been evaluated at this stage. Reasonable alternative sites, including those to be carried forward from other local plan documents, and any site-specific policy provisions, will be assessed in the SA process as part of the next plan making stage.

E.5.6 Policy Direction 17: A low carbon economy

Draft Policy Direction 17: A low carbon economy

- Employment development that seeks to reduce its carbon footprint through climate adaptation and mitigation techniques will be supported, provided it accords with our overall spatial strategy for employment development.
- The retrofitting of existing employment development to improve energy efficiency and incorporate low carbon technologies will be supported.
- The incorporation of renewable energy generation into employment development will be supported provided it is appropriate to the location and type of development.
- The development of businesses that contribute to the ‘green economy’ will be supported in principle.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
17	++	0	0	0	0	+	0	+	0	0	0	0	0

E.5.6.1 Policy Direction 17 sets out how employment developments within the Plan area can reduce their carbon footprint and support a low carbon economy. The promotion of low carbon technologies and improved energy efficiency will help to decrease the reliance on energy generated from unsustainable sources, such as fossil fuels. This will help to reduce the volume of GHGs emitted into the atmosphere and reduce the SWLP area’s contribution towards the causes of climate change. The policy will be likely to have a major positive impact on climate change through the delivery of low carbon technologies and climate adaptation and mitigation techniques (SA Objective 1). Secondary benefits to air quality and overall waste production as a result of efforts to reduce the carbon footprint and contribute to a green economy are likely. Therefore, minor positive impacts on air pollution and waste could be expected (SA Objectives 6 and 8).

E.5.6.2 It is recommended that the policy could include stronger wording to encourage rather than simply support the incorporation of low-carbon and renewable technologies, and/or include requirements for certain development types/scales to incorporate such technologies.

E.5.7 Policy Direction 18: Supporting rural employment and diversification

Draft Policy Direction 18: Supporting rural employment and diversification

- Development that contributes to a prosperous rural economy will be supported in principle, including the diversification of agricultural businesses and the expansion of existing rural businesses.
- Outside of settlement boundaries, employment development will be acceptable in principle where it accords with our Spatial Growth Strategy (see Section 4.1), is of an appropriate scale to its location, is easily accessible and respects the character of the surrounding area.
- Proposals for small and start-up businesses in rural areas will be supported in principle, where appropriate to their location. The SWLP will look at allocating sites for these purposes.
- Agricultural diversification schemes will be encouraged providing they are of an appropriate scale to their location, respect the character of the surrounding landscape, re-use existing buildings where possible and any new buildings are well related to the built form and scale of the agricultural business.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
18	0	0	0	0	0	0	0	0	0	0	0	0	++

E.5.7.1 Policy Direction 18 sets out the circumstances in which employment development in rural areas will be supported. South Warwickshire is largely rural and the policy aims to support start-up businesses in rural areas, agricultural diversification schemes and the expansion of rural businesses, to ensure a thriving rural economy. Overall, the policy will be expected to have a major positive impact on the rural economy, by supporting business start-ups and increasing employment opportunities within rural areas (SA Objective 13).

E.5.7.2 The policy states that employment development outside of settlement boundaries and proposals in rural areas will be supported where they are of appropriate scale to their location and respect the character of the surrounding landscape. Furthermore, the policy encourages the re-use of existing buildings, which will help to ensure new development is in keeping with the surrounding character and identity of the area. Re-using existing buildings may also help to prevent the loss of BMV soil and undeveloped land in the rural area. These measures will be likely to reduce the potential for adverse effects, and as such, a negligible impact is identified on the landscape character and natural resources (SA Objectives 4 and 7).

E.5.8 Policy Direction 19: Supporting a range of business units and affordable employment space

Draft Policy Direction 19: Supporting a range of business units and affordable employment space													
<ul style="list-style-type: none"> • Employment development that includes a range of unit sizes, including smaller units (<1900sqm / 20,000sqft) and medium size units (1900sqm – 9300sqm /20,000 – 100,000sqft) for start-up businesses and move-on space for businesses to expand, will be supported in principle. • New large scale employment development (>9,300sqm/100,000sqft) will be expected to provide an element of employment space for small and medium-sized enterprises, including move-on space, unless proven to be financially unviable or unsuitable for the specific site. • Proposals for large-scale employment development will be encouraged to include an element of affordable workspace for SMEs. • We will investigate the potential for allocating sites for affordable business space and move-on units within the Reg.19 version of the SWLP. We will also consider that the next Reg.19 stage of the SWLP other mechanisms that may be appropriate for securing affordable business space. • Development proposals for live-work units will be supported where appropriate to their location. 													

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
19	0	0	0	0	0	0	0	0	0	0	0	0	++

E.5.8.1 Policy Direction 19 sets out the measures which will support affordable employment space and encourage business expansion. The policy encourages development that will include “*move-on space*”, which will enable smaller business start-ups and allow businesses that are ready to expand to do so. It is likely that the policy will contribute to providing increased employment opportunities within the Plan area, supporting a more diverse supply of employment land that meets the needs of varying business. A major positive impact on the local economy is identified (SA Objective 13).

E.5.9 Policy C: Protecting community facilities

Draft Policy C: Protecting community facilities

Redevelopment or change of use that would result in the loss of a community facility that serves local needs will only be permitted where it can be demonstrated that all of the following criteria are met:

1. there is no realistic prospect of the facility continuing for commercial and/or operational reasons on that site and a viability assessment supports this;
2. the land and/or property has been actively marketed for a period of at least 12 months at a realistic market price or otherwise made available for a similar or alternative type of facility that would be of benefit to the community;
3. there are similar facilities accessible to the local community that can continue to meet its collective needs and expectations

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

E.5.9.1 Policy C aims to provide protection for existing community facilities (such as local shops, village halls, medical facilities, sports venues and pubs) and includes the circumstances where loss of a community facility may be permitted. The policy states that where a community facility will be lost there will need to be similar facilities that are accessible to the community and that are able to meet the needs and expectations of the area. Through the protection of community facilities the policy is expected to have a minor positive impact on the health and wellbeing of local residents, accessibility to social infrastructure and the local economy (SA Objectives 10, 11 and 13).

E.5.10 Policy Direction 20: Supporting our changing town centres

Draft Policy Direction 20: Supporting our changing town centres

To support our changing town centres and assist in maintaining vitality and viability the Local Plan will: -

- 1) **Protect and enhance the town centres.** We will identify the South Warwickshire retail hierarchy and ensure that that development proposals for town centre uses are only permitted where they are of an appropriate scale in relation to the identified role and function of the centre and its catchment and reflect the character and form of the centre.

Based on the findings of the Retail and Town Centre Uses Study (2022) and consistent with the NPPF, we propose the following hierarchy of centres:

Town Centres

- Leamington Spa

Draft Policy Direction 20: Supporting our changing town centres

- Warwick
- Kenilworth
- Stratford-upon-Avon

Local Centres

- Alcester
- Bidford-on-Avon
- Henley-in-Arden
- Kineton
- Shipston-on-Stour
- Southam
- Studley
- Wellesbourne

- 2) **Define the town centre boundaries**, we will define the town centre boundaries and identify the Primary Shopping Areas (PSA) and other retail areas. In doing so this policy will also make clear the range of uses permitted in such areas.

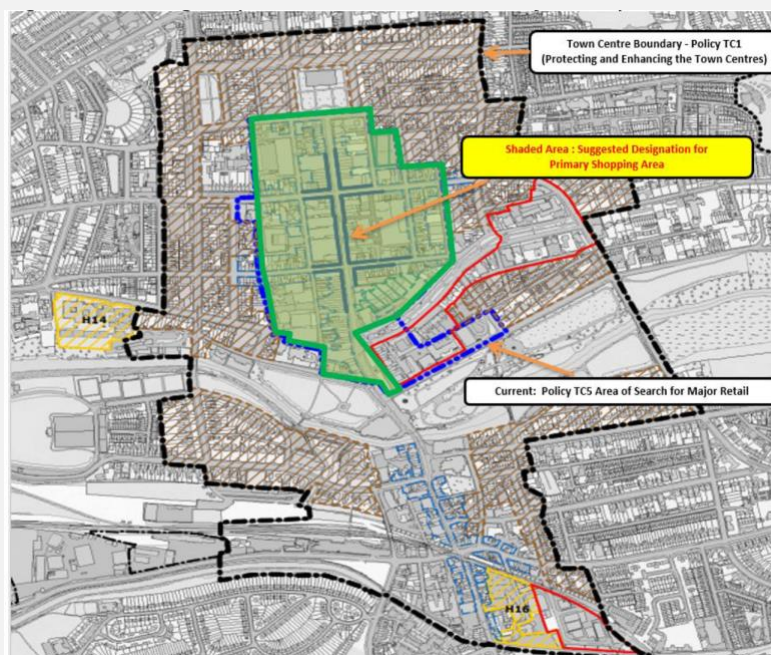
Based on the findings of the Retail and Town Centre Uses Study (2022), the following town centre boundaries and PSA are proposed for the main town centres in Warwick and Stratford-on-Avon Districts respectively:

Warwick District

Leamington Spa

No proposed change to the town centre boundary. We consider the need for a defined PSA as per the latest NPPF, and put forward a suggested area for a PSA as shown in the map below:

Figure 11: Leamington Primary Shopping Area



The suggested area for PSA, are to reflect the where the retail provision is concentrated, will include the following locations:

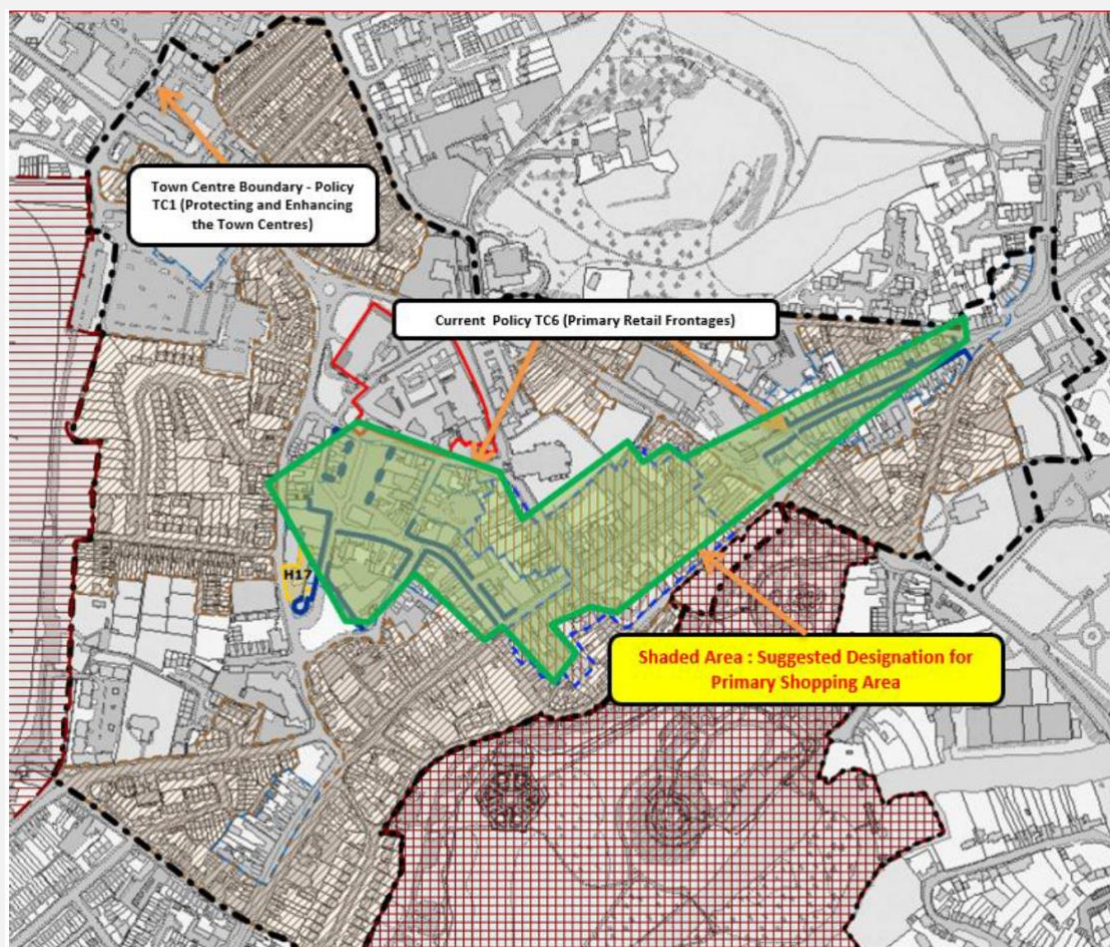
- The Parade
- Warwick Street
- Regent Street
- Livery Street

Warwick

Draft Policy Direction 20: Supporting our changing town centres

There are no proposed changes to the existing town centre boundary for Warwick contained in the Warwick District Local Plan. In relation to the PSA, there is considered to be a need to consolidate the areas of retail with a contiguous boundary as shown below:

Figure 12 Warwick Primary Shopping Area



Suggested area for PSA ,to reflect the where the retail provision is concentrated, will include the following locations:

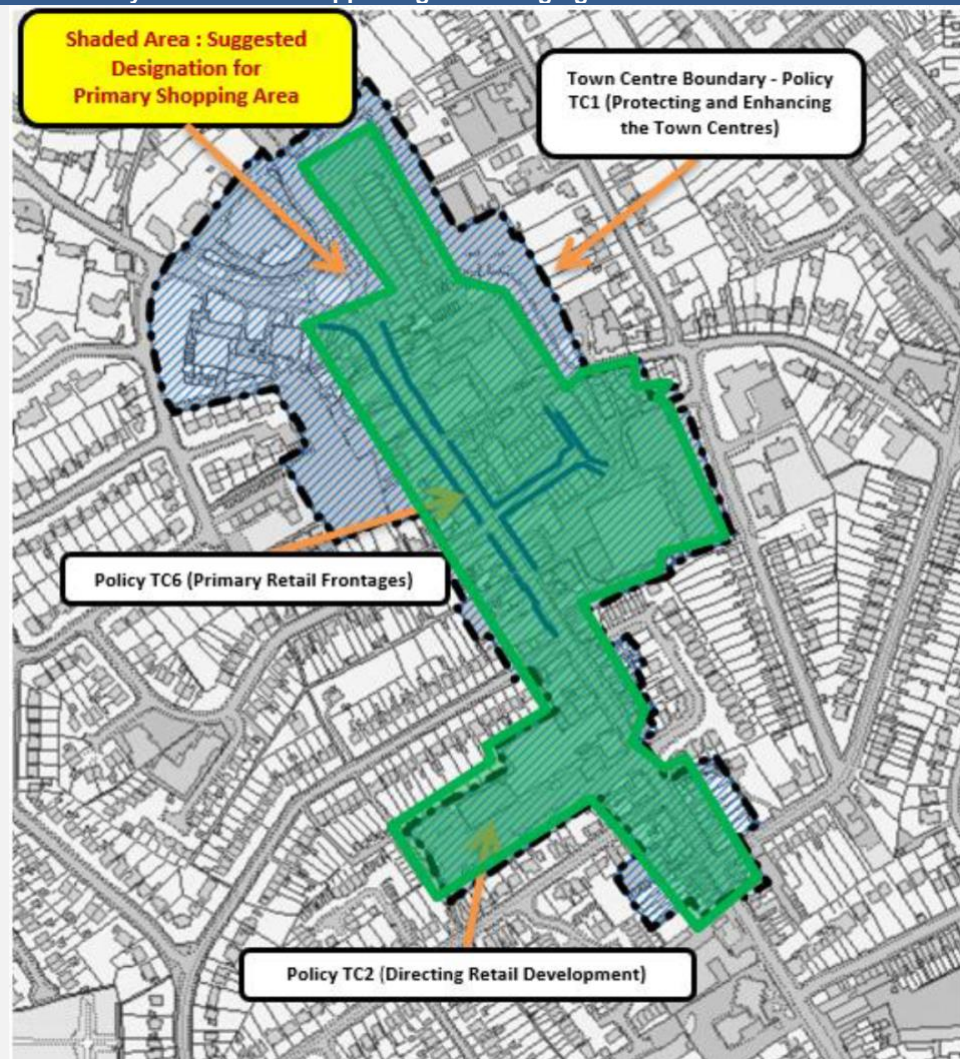
- Swan Street
- Market Place
- Market Street
- Northgate Street
- Barrack Street
- Smith Street / Coten End

Kenilworth

No proposed change to the town centre boundary. In relation to the PSA there is a need to define it around the retail core of Warwick Road as shown below:

Figure 13: Kenilworth Primary Shopping Area

Draft Policy Direction 20: Supporting our changing town centres



Suggested area for PSA, to reflect the where the retail provision is concentrated in the following locations is as follows:

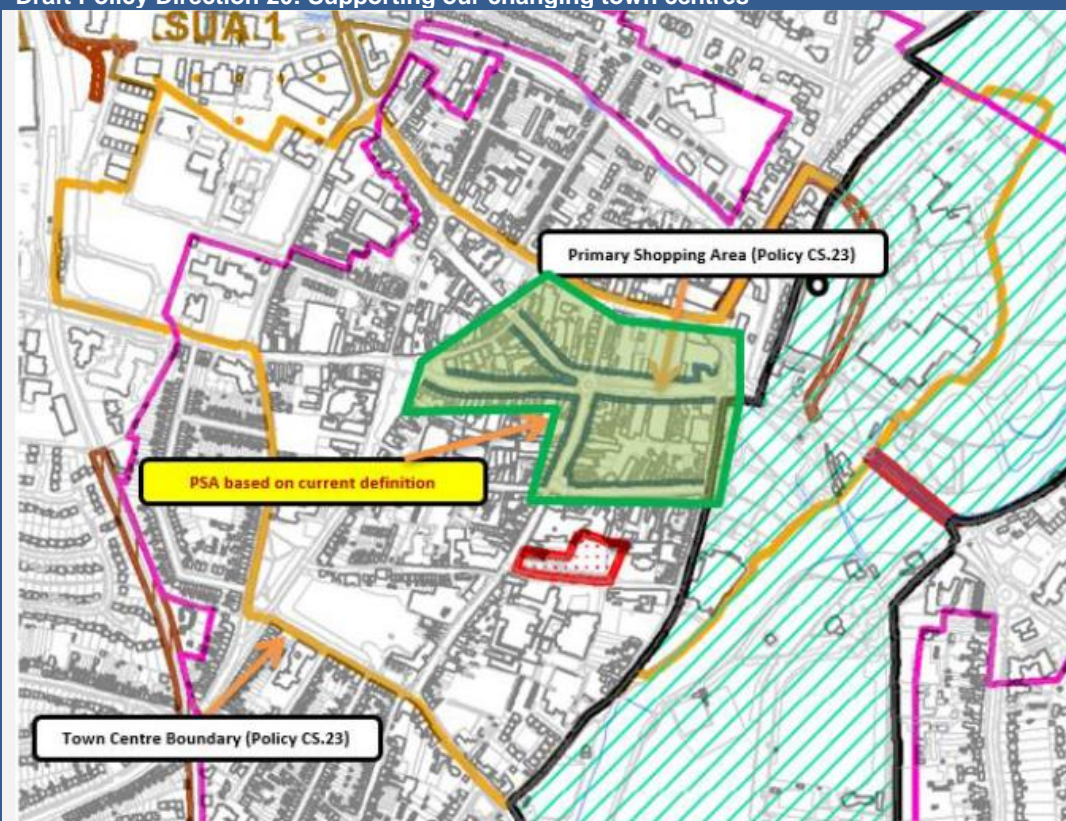
- Abbey End
- Warwick Road – Clock Tower Roundabout to south of the junction with Waverley Road
- Talismann Square / Waitrose

Stratford-upon-Avon

No change is proposed to the town centre boundary or PSA as currently proposed in the adopted Stratford-on-Avon Core Strategy, as shown below:

Figure 14: Stratford-upon-Avon Primary Shopping Area

Draft Policy Direction 20: Supporting our changing town centres



PSA, to reflect the where the retail provision is concentrated, will include the following locations:

- Wood Street
- Henley Street
- High Street
- Sheep Street
- Union Street
- Guild Street

Local Centres

The existing town centre boundaries for the Main Rural Centres (which are proposed to be renamed 'Local Centres' for consistency with NPPF), as designated in the adopted Stratford-on-Avon District Core Strategy, are considered to be adequate across all the centres as they reflect the broad urban form of the centres.

We will investigate the potential for defining PSAs in the Main Rural Centres for the Regulation 19 Local Plan consultation.

- 3) **Direct Main Town Centre Developments.** This policy will support the Government's 'town centres first' approach setting out the required Sequential approach for the consideration of new main town centre development proposals. It will also explain the instances where a sequential test and an impact assessment will be required in support of a proposal that is to be located out-of-centre. This Policy will also specify a locally - set threshold requirement for impact assessments.

Based on the findings of the Retail and Town Centre Uses Study (2022), it is proposed that the Retail Impact Threshold for assessing the impacts of any proposed retail/leisure developments outside of defined centres is set at 280sqm.

- 4) **Providing for Growth.** This policy will consider the potential for future allocative requirements regarding retail, leisure, office and any other main town centre uses. This will require a re- assessment of any current allocated sites that have not been developed.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
20	0	0	0	+	0	0	0	0	0	0	+	0	++

E.5.10.1 Policy Direction 20 sets out the policy framework which will support the maintenance and enhancement town centres within the SWLP area. Furthermore, the policy sets out the hierarchy of centres and provides details of where primary shopping areas will be located within existing town centres and encourages retail, leisure and office uses within these areas. The policy will provide improved employment opportunities and community developments to boost the local economy and ensure that different locations are provided with appropriate uses to meet the needs of local communities, reflecting their role in the hierarchy of settlements. The policy will therefore be expected to have a minor positive impact on transport in terms of access to shops and services (SA Objective 11) and a major positive impact on the economy through increased job opportunities and employment/retail floorspace (SA Objective 13).

E.5.10.2 The policy states that development proposals for town centre uses will only be permitted where they are appropriate to the scale and intended function of the centre and its catchment, reflecting the character and form of the town centre. Development under this policy will therefore be expected to respect the identity and character of the town centres and could result in a minor positive impact on the townscape character (SA Objective 4).

E.5.10.3 It is recommended that the policy could be enhanced through encouraging town and local centres to promote high quality design, active frontages, and a walkable public realm to maintain and improve the vitality and vibrancy of centres, or cross-reference to provisions of other SWLP policies that seek to achieve these goals.

E.5.11 Policy Direction 21: Arts and culture

Draft Policy Direction 21: Arts and culture

Cultural, tourist and leisure facilities within South Warwickshire will, wherever possible, be protected, enhanced and expanded (where appropriate) in partnership with key delivery partners and stakeholders.

In cases where new development could potentially prejudice the successful ongoing operation of an adjacent cultural / performance venue, the agents of change principle will be applied.

Proposals for new development or uses that contribute to the attractiveness of South Warwickshire as a visitor destination (including for business tourism) will be supported in principle, subject to national guidance and the policy requirements set out elsewhere in this Plan.

Development that would lead to the loss of an existing cultural / tourism facility in South Warwickshire will be resisted unless:

- the intention is to replace it with a facility that will provide an improved cultural or tourist offer;
- it can be demonstrated that there would be significant benefits to the local and wider community in removing the use and / or redeveloping the site; or
- An appropriate contribution is made to support and sustain an alternative local cultural, tourist or leisure facility.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
21	0	0	0	+	+	0	0	0	0	0	0	0	+

E.5.11.1 Policy Direction 21 aims to protect and enhance South Warwickshire’s arts and cultural sector, associated with heritage and tourism assets. The policy wherever possible will protect, enhance and expand cultural, tourist and leisure facilities within the Plan area and ensure where the loss of an existing cultural / tourist facility cannot be avoided, an appropriate contribution towards alternative facilities is provided. The policy will be expected to provide increased employment opportunities and support development that contributes to the attractiveness of South Warwickshire as a visitor destination; therefore, a minor positive impact on the local economy will be likely (SA Objective 13).

E.5.11.2 South Warwickshire has a rich cultural heritage, supporting many historic settlements and distinctive landscapes and features. Through the protection and enhancement of arts and culture, benefits to the local landscape and townscape will be likely including surrounding heritage assets. Therefore, minor positive impacts on landscape, townscape and heritage assets are likely (SA Objective 4 and 5). It is recommended that the policy includes stronger wording to ensure that heritage assets and their settings are conserved and enhanced alongside any proposed development proposals, in line with their significance, and that opportunities are sought to increase public access or understanding of heritage assets.

E.6 A Climate Resilient and Net Zero Carbon South Warwickshire

E.6.1 Policy D: Large scale renewable energy generation and storage

Draft Policy D: Large scale renewable energy generation and storage

General

Proposals for renewable energy generation and storage will be supported in the context of sustainable development and climate change, where they:

- a) Balance the wider environmental, social and economic benefits of renewable electricity, heat and/or fuel production and distribution.
- b) Will not result in significant adverse impacts on the local environment, including landscape character; species and habitats; amenity; agricultural land use and local heritage, that cannot be satisfactorily mitigated. This includes impacts such as noise, shadow flicker, vibration, visual impacts such as glint or glare.
- c) Provide for a community benefit in terms of either profit sharing or proportion of community ownership or deliver local social and community benefits.
- d) Include appropriate plans and a mechanism in place for the removal of the technology on cessation of generation, and restoration of the site to its original use or an acceptable alternative use.

In cases where the land around a renewable energy facility is not used for agriculture, this land should be used to protect local habitats, enhance biodiversity, deliver carbon sequestration benefits, and protect local ecosystems.

In addition to the general policy criteria identified above, additional criteria for solar energy, wind energy and energy storage schemes are set out below.

Solar energy

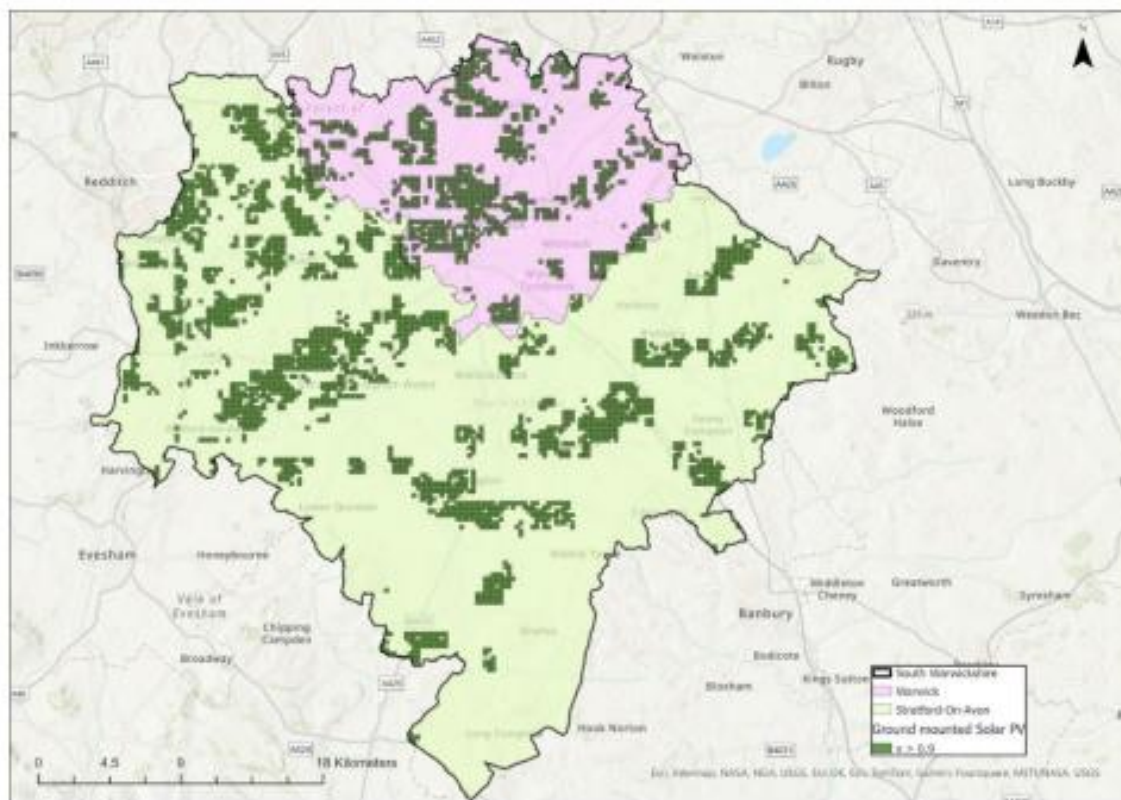
Ground mounted solar energy proposals will be supported in principle on:

- A) Previously developed land,
- B) Lower-quality agricultural land (Grades 3b, 4 and 5) that also has low carbon sequestration potential and low biodiversity value;
- C) Higher agricultural land (Grades 1, 2, and 3a) if the scale of the development does not restrict the agricultural use of the land.

Figure 15: Ground mounted solar PV combined score for the SWLP area (including consideration of baseline habitat).

Source: Figure 10 of SWLP Evidence: Climate Change – Renewables and Decentralised Energy Opportunities, May 2024, prepared by Arup

Draft Policy D: Large scale renewable energy generation and storage



Where development other than solar farm development is proposed on sites identified on Figure 16 as land suitable for Ground Mounted Solar PV (score >0.9), development in those areas will be expected to install solar PV, this could be either rooftop or ground mounted.

Wind energy

Wind energy development proposals will be supported in principle where they:

- e) Are located on:
 - o Previously developed land,
 - o Lower-quality agricultural land (Grades 3b, 4 and 5) that also has low carbon sequestration potential and low biodiversity value; OR
 - o Higher agricultural land (Grades 1, 2, and 3a) if the scale of the development does not restrict the agricultural use of the land.

AND

- f) Demonstrate that, following consultation, the planning impacts identified by the affected local community have been fully addressed by the proposal.

Wind energy developments must minimise and/or mitigate amenity and environmental impacts, including to:

- g) Avoid or adequately mitigate shadow flicker, noise and adverse impact on air traffic operations, radar and air navigational installations; and
- h) Ensure flight paths and habitat corridors of protected mobile species such as birds and bats, and functionally linked habitat associated with protected sites, are not adversely affected.
- i) Ensure safety in relation to the distance to power lines and buildings, the impact on air traffic, Ministry of Defence operations, weather radar and the strategic road network.

In each case, the Council will also expect the applicant to demonstrate that any cumulative visual and landscape impacts have been considered.

Energy Storage

There is a presumption in favour of energy storage where it meets one or more of the following:

- j) It is co-located with an existing or proposed renewable energy development;
 - k) It can be shown that it alleviates grid constraints or contributes to meeting renewable energy supply;
- and

Draft Policy D: Large scale renewable energy generation and storage

l) It allows further renewable developments to be deployed.

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

E.6.1.1 Policy D aims to transition away from fossil fuels and increase the use and supply of renewable and low carbon energy and heat. The policy sets out how development proposals for solar and wind energy development will be supported. The policy will help to meet national targets including the government’s aim of reaching net zero by 2050 and will support the Council’s climate emergency declaration which was made in 2019.

E.6.1.2 Through encouraging the use of renewable energy and improving energy infrastructure, it is likely that the use of renewable energy will result in reduced levels of air pollutants including GHG emissions, contributing towards decarbonisation and meeting net zero targets. A minor positive impact on pollution is identified (SA Objective 6). Through providing more efficient energy infrastructure, a decrease in energy demand could be expected and overall a major positive impact for climate change is identified (SA Objective 1).

E.6.1.3 The policy states that development proposals for renewable energy will only be supported where these do not result in significant adverse impacts on landscape character, species and habitats, amenity, agricultural land and local heritage. Furthermore, development is also required to ensure cumulative visual and landscape impacts are considered and habitat corridors, functionally linked land and protected species are not adversely impacted. The policy also states that proposals that include surrounding land not suitable for agricultural use should seek opportunity to enhance biodiversity, protect local habitats and local ecosystems. By ensuring that development proposals do not impact local landscapes, protect and seek opportunities to enhance local wildlife and protect local heritage, an overall minor positive impact is identified on local biodiversity and landscape character (SA Objective 3 and 4) and a negligible impact is identified for cultural heritage (SA Objective 5). It is recommended the policy includes stronger wording in relation to landscape and cultural heritage and ensures that proposals of solar and wind energy use factor in the local landscape and setting of heritage assets, specifically in relation to the height of the development proposed.

E.6.1.4 The policy states that proposals for solar and wind energy will support development on brownfield land and low-quality agricultural land, which will be expected to protect higher quality agricultural land within the Plan area. A minor positive impact is identified for natural resources (SA Objective 7).

E.6.2 Policy E: Protecting large scale existing renewable energy infrastructure

Draft Policy E: Protecting large scale existing renewable energy infrastructure

All types of development should not harm:

Draft Policy E: Protecting large scale existing renewable energy infrastructure

- a) the technical performance of any existing or approved renewable energy generation facility;
- b) the potential for optimisation of strategic renewable energy installations; or
- c) the availability of the resource, where the operation is dependent on uninterrupted flow of energy to the installation.

Applications will be required to submit evidence to demonstrate that development does not negatively impact on the operations of the renewable energy facility.

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

E.6.2.1 Policy E ensures that existing renewable energy infrastructure is protected and that the operations of renewable energy facilities are not adversely impacted by development. By protecting renewable energy infrastructure within the SWLP area and ensuring their ongoing operation, reductions in GHG emissions are likely to continue and net zero targets are more likely to be met, leading to a minor positive impact on climate change is identified (SA Objective 1). There is potential for an indirect minor positive impact on pollution (SA Objective 6) where the emission of air pollutants may also be reduced.

E.6.3 Policy F: Decentralised energy systems

Draft Policy F: Decentralised energy systems

Council will strongly encourage the use and development of decentralised energy systems, which incorporate either heating (District Heating) or heating, power and cooling (Combined Heat and Power) or power (Micro-grid) into new developments.

Major development in South Warwickshire will be required to demonstrate a thermal masterplanning approach to maximise energy efficiency opportunities for the use of decentralised energy systems. New decentralised energy networks are to be futureproofed for future expansion opportunities.

Council will expect schemes to demonstrate proposed heating and cooling systems have been selected in line with the following order of preference:

- a) Connection with existing heating/cooling distribution networks
- b) Site wide heating/cooling fed by renewables
- c) Communal heating/cooling fuelled by renewable energy sources
- d) Gas fired heating/cooling

The development of decentralised energy systems and associated infrastructure should be approved unless it results in significant adverse impacts on the environment or does not present an affordable option to occupants.

New development will be expected to connect to existing systems where and when this is available, unless it is demonstrated that this would render development unviable.

New development of one or more dwellings (C3 or C4 use class) and/or 1,000sqm or more of new non-domestic floorspace – Gross Internal Area (GIA) including non-residential floorspace, hotels (C1 use class) or residential institutions (C2 use class) will require a detailed energy statement demonstrating how the building performance standards will be met using the energy hierarchy in the design, construction, and operation phases. This should include consideration for rooftop PV generation, local electricity storage, low carbon heating such as heat pumps, and the possibility for low carbon communal heat networks.

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

E.6.3.1 Policy F sets out the aims to decentralise energy systems to increase the energy resilience of communities within the SWLP area and help contribute towards decarbonisation and net zero targets. The policy will require new development to provide detailed energy statements relating to building performance, including consideration of low carbon heating such as heat pumps and low carbon communal heat networks. Efficient design and building of development proposals that meet required energy standards will help reduce the risk of heat gain and minimise the amount of energy needed to cool and heat buildings, reducing heat lost the environment. The policy is likely to result in a minor positive impact on climate change mitigation and adaptation (SA Objective 1), and a secondary minor positive impact on pollution (SA Objective 6).

E.6.3.2 Through ensuring more energy efficient homes, and more sustainable sources of energy and heat, Policy F could also lead to a minor positive impact on human health and wellbeing through ensuring affordable warmth and good quality living conditions, as well as through the potential secondary benefits to air quality (SA Objective 10).

E.6.4 Policy Direction 22: Net zero carbon buildings

Draft Policy Direction 22: Net zero carbon buildings

The policy direction applies to both residential and non-residential buildings and for ease the policy requirements have been split between residential and non-residential as there are slightly different requirements for both uses. Part A of the policy sets out the requirements for residential buildings and part B set out the criteria for non-residential buildings.

Part A-Residential Buildings

All new buildings must be designed and built to be Net Zero Carbon in operation. They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match annual energy use. New development of one or more new dwellings (C3 or C4 use class) should achieve net zero operational regulated carbon emissions by complying with criteria 1 to 8 as set out below:

Criterion 1: Carbon reductions

Proposals should demonstrate application of the energy hierarchy through submission of an energy statement which identifies:

- i. For new dwellings, a minimum 63% reduction in carbon emissions is achieved by on-site measures, as compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2).

Alternatively, applications may demonstrate the requirements of Criterion 1 are met through the Passivhaus standard with accompanying Passive House Planning Package (PHPP) calculations submitted within the energy statement (without the use of fossil fuels on site including gas). A condition will be applied requiring Passivhaus certification prior to occupation.

Criterion 2: Fossil fuel-free new development

- a. It is expected that all new developments will use a heat pump as primary heating system instead of a gas boiler. Buildings with flats that cannot have individual heat pumps should consider opportunities for building and/or community size systems (heat pumps or hybrid as necessary).

Draft Policy Direction 22: Net zero carbon buildings

- b. In areas with low-carbon district heating networks, all new developments should consider connection to existing heating networks as priority.

Criterion 3: Dwelling airtightness and ventilation

- a. The airtightness level in FHS notional dwelling is much lower than LETI Guidance and PassivHaus specifications. It is expected that new developments will achieve higher airtightness than the FHS notional building where possible.
- b. Mechanical ventilation with heat-recovery systems should be considered as the main ventilation strategy or in combination with natural ventilation as part of mixed mode ventilation strategy. Additional indoor control systems should be considered if they deliver additional value for the additional capital costs.

Criterion 4: Renewable electricity generation and storage.

Rooftop PV generation should be maximised in new developments. Rooftop PV capacity on average of 3kWp – 4 kWp per home should be considered in the initial stages of design. Housing density, roof orientation and roof pitch should be optimised for PV generation wherever possible.

Excess generation should be used locally if possible. This could be achieved with battery storage, as part of a hot water strategy, EV charging and/or by mixed use and connection with local non-residential facilities.

Criterion 5: Compact building form with low form factors

Compact Building design simply means using the least amount of land for development and supporting infrastructure that is reasonable under the circumstances. It is recommended that the range to be the following:

- Building form – compactness: Surface area to volume (A/V) ratios $\leq 0.7\text{m}^2/\text{m}^3$
- Indicative Form factor (impacts heat loss, external surface area / heated floor area) ≤ 3

Criterion 6: Consideration of site density, layout, and coverage

All major developments should ensure that new developments are designed in a way to adapt to climate change in terms of site orientation, shading etc.

Criterion 7: Cool and Green roofs – runoff flooding risks and overheating

Developments should consider properly designed and constructed green roofs as they have multiple benefits including reducing the surface run off whilst having a positive impact on biodiversity. Roofs can use reflective materials to prevent overheating. Consideration should also be given to include green walls as they help in reducing overheating in the buildings.

Criterion 8: LED lighting with indoor controls

Low-energy LED lighting throughout all non-domestic buildings. Developments should also include occupancy control measures along with dimming features to reduce energy.

Part B-Non-Residential Buildings

All non-residential buildings of 1,000sqm floorspace, hotels (C1 use class), or residential institutions (C2 use class) should achieve net zero operational regulated carbon emissions by complying with criteria 1- 9 below:

Criterion 1: Carbon Reductions

Non-residential developments, hotels and residential institutions should achieve at least a 35% reduction in carbon emissions through on-site measures compared to the rate set by Building Regulations 2013 (or equivalent percentage reduction on Building Regulations 2021) Alternatively, the Local Plan specifies Passivhaus certified development without fossil fuel use on site for the operation of buildings.

Best practice benchmarks:

LETI Guidance (Small offices)

EUI = 55 kWh/m².yr (excluding renewable energy contribution) | Space Heating demand : 15 kWh/m².yr

RIBA Good Practice (2021)/ Reference

EUI < 90 kWh/m².yr (including renewable energy contribution) and/or DEC C (65) and/or NABERS Base build 5

Draft Policy Direction 22: Net zero carbon buildings

RIBA 2030 Challenge

EUI < 55 kWh/m2.yr (including renewable energy contribution) and/or DEC B (40) and/or NABERS build 6

Criterion 2: High performance mechanical ventilation

Installation of high-performance mechanical ventilation with CO2 sensors and heat recovery where feasible. Consideration of variable air volume heating, ventilating and air conditioning (VAV HVAC) system and/or reversible heat pumps where feasible.

Criterion 3: Sourcing 100% renewable electricity by 2030

All new non-residential developments should consider sourcing 100% renewable electricity by 2030 with reasonable on-site renewable electricity generation being a priority.

Criterion 4: LED lighting with indoor controls

Low-energy LED lighting throughout all non-domestic buildings. Developments should also include occupancy control measures along with dimming features to reduce energy use.

Criterion 5: Building orientation and site layout to maximise on site renewable electricity generation

The orientation of the building roofs and the building design should aim to maximise roof surface areas suitable for PV generation. At the same time, window orientation and shading should be in the context of the local microclimate to reduce summer solar gains, maximise use of daylight and allow natural ventilation as part of a mixed mode ventilation strategy where possible.

Criterion 6: Sustainability performance certifications

All non-residential developments over 1000 sq. m are required to achieve as a minimum BREEAM standard 'very good' (or any future national equivalent), or a suitable alternative sustainability strategy is proposed and agreed with the Council. If the applicant has used certification other than BREEAM it will need to be assessed by independent assessors and the applicant will be expected to pay for that assessment.

Criterion 7: Cycle storage, connection to cycling routes and changing facilities

Non-residential buildings should facilitate sustainable and active travelling by safe connections to local cycling routes, provision of cycle storage, shower and changing facilities.

It should be noted that where full compliance is not feasible or viable the applicant needs to submit robust evidence along with the energy statement setting out clearly the reasons for non-compliance.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
22	++	+	+	+	0	+	0	0	0	+	+	0	0

E.6.4.1 Policy Direction 22 sets out the requirements for residential and non-residential development to achieve net zero carbon, including measures to reduce operational and construction related carbon emissions.

- E.6.4.2 The policy will help reduce carbon emissions for both residential and non-residential new development. A minimum of 63% reduction in carbon emissions is required on-site for new residential development and a 35% reduction in carbon emissions is required on-site for non-residential development, compared to baseline rates set out in Part L of the Building Regulations. Furthermore, proposals for both residential and non-residential development are required to utilise renewable energy, including on-site renewable energy production, for example through rooftop PV generation. The policy also requires that both residential and non-residential development prioritise energy efficiency within the design and layout of proposals and compact building design for residential development, alongside the use of green roofs which will be expected to provide benefits to local landscape. Overall, through reducing carbon emissions and improving the energy efficiency of new development across the Plan area, a major positive impact on climate change (SA Objective 1) and a minor positive impact on pollution (SA Objective 6) is identified. Furthermore, compact design and the use of green roofs could potentially result in a minor positive impact for the local landscape (SA Objective 4).
- E.6.4.3 By implementing green infrastructure such as green roofs and walls, minor positive impacts on flooding (SA Objective 2) and local biodiversity (SA Objective 3) could be expected through reduced surface run-off and the provision of habitats.
- E.6.4.4 The policy will help residents to pursue active methods of travel, by ensuring that appropriate facilities are considered, such as cycle storage and will also ensure safe connections to cycle routes. A minor positive impact on the health of residents and access to sustainable transport methods is identified (SA Objective 10 and 11).

E.6.5 Policy Direction 23: Reducing energy consumption in existing buildings

Draft Policy Direction 23: Reducing energy consumption in existing buildings

For all development proposals that involve the change of use or redevelopment of a building, or an extension to an existing building, proposals are expected where possible to improve the energy efficiency of that building (including the original building, if it is being extended) through a submitted Energy Assessment and Plan.

Proposals relating to an existing building that demonstrate that they will result in significant improvements to that building's operational energy efficiency and/or operational carbon emissions through on-site measures, will be supported.

The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings will be expected, including the retrofitting of listed buildings, buildings of solid wall or traditional construction and buildings within conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.

Retrofit schemes should align with key industry standard guidance (currently this includes LETI's Climate Emergency Retrofit Guide and the EnerPHit Passivhaus standard). Taken together, these guidance documents highlight that best practice retrofit should:

- Reduce energy consumption and space heating demand
- Prioritise occupant and building health, by establishing good indoor comfort levels and good indoor air quality through a fabric-first approach and systems-level ventilation
- Take a 'whole building' or 'deep retrofit' approach, by selecting retrofit interventions that are tailored to the property type (i.e. accounting for factors such as historical designation status, form factor⁴⁷ and construction)
- Consider the impact on embodied carbon, by maximising the re-use of existing building fabric and sourcing materials using a circular economy approach.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
23	+	0	0	0	+	+	0	+	0	+	0	0	0

E.6.5.1 Policy Direction 23 will enable the retrofitting of buildings to reduce energy consumption and improve energy efficiency. Energy efficiency measures, which include consideration of the appropriate use of materials and Passivhaus standards, will be expected to improve the operational energy efficiency of buildings or reduce operational emissions. The policy also recognises the impact of embodied carbon and will ensure that the re-use of existing building fabric and sourcing materials is approached to pursue a circular economy, reducing waste and protecting South Warwickshire’s resources. Furthermore, the policy will ensure that the health of occupants is prioritised, establishing good indoor air quality through “a fabric-first approach and systems-level ventilation”. A minor positive impact on climate change, pollution, waste and health is identified (SA Objective 1, 6, 8 and 10).

E.6.5.2 The policy will also provide benefits to historic assets within the SWLP area. The policy will ensure that the special characteristics of heritage assets will be safeguarded and “sensitive” retrofitting energy efficiency measures will be used on historic buildings. A minor positive impact on cultural heritage is expected (SA Objective 5).

E.6.6 Policy Direction 24: Embodied Carbon

Draft Policy Direction 24: Embodied Carbon

All new major developments should demonstrate how the embodied carbon of materials has been considered and reduced where possible. New developments are expected to achieve at least the RIBA Good Practice targets and show consideration of solutions towards the RIBA 2030 Challenge targets. These practice benchmarks will help inform the policy at the Regulation 19 stage.

Best practice benchmarks:

LETI Guidance

Embodied carbon = 300 kgCO₂e/m² (200 kgCO₂e/m² incl. sequestration)

RIBA Good Practice 2025 Targets

Embodied carbon <800 kgCO₂e/m²

RIBA 2030 Challenge

Embodied carbon < 625 kgCO₂e/m²

Passive House

Embodied carbon: encourages “optimisation”

Development will be expected to minimise its embodied carbon. In doing so, development shall:

- Re-use of any existing buildings on a site has been robustly explored and demonstrated to be unfeasible before resorting to demolition.
- Be designed efficiently to minimise the quantity of materials required to meet the building’s functional requirements.
- Waste generation has been minimised and re-use and recycling of materials is maximised during the construction phase including reusing the relevant demolition material.

Draft Policy Direction 24: Embodied Carbon

- The carbon footprint associate with the sourcing and production of the materials is considered when selecting the materials for construction purposes. Where possible locally sourced sustainable materials should be prioritised.

Ensure that new buildings are flexible and adaptable to future uses, easily maintained reducing the need for future redevelopment. Development should set out through the Energy Statement how these issues will be addressed. Energy statements demonstrate how improved energy performance will be achieved, and this requirement is over and above the Building Regulations. It is a detailed report demonstrating how the development will meet the energy standards set by the local authority. In addition to the above requirements proposals for development of 50 or more new dwellings and/or 5,000sqm or more of new non-residential floorspace should be accompanied by a whole-life assessment of the materials used.

All new non-residential developments are expected to achieve at least RIBA Good Practice 2025 targets or similar levels for specific use categories. Considerations should be evidenced for reducing embodied carbon to achieve RIBA 2030 Challenge targets or as close as possible.

LETI Guidance

Embodied carbon = 350 kgCO₂e/m² (250 kgCO₂e/m² incl. sequestration)

RIBA Good Practice 2025 Targets

Potable water: 13 l/p/day | Embodied carbon < 970 kgCO₂e/m²

RIBA 2030 Challenge

Potable water : < 10 l/p/day | Embodied carbon < 750 kgCO₂e/m²

Where it is not viable to meet these targets for embodied carbon, a full justification will be required as part of the embodied carbon assessment within the Energy and Sustainability Statement.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
24	++	0	0	0	0	+	+	0	0	0	0	0	0

E.6.6.1 Policy Direction 24 seeks to reduce the release of embodied carbon from development, supporting the SWLP climate change objectives. The policy requires development to re-use existing buildings on site where available to avoid demolition; be designed efficiently to minimise the re-use of materials; minimise the generation of waste and promote recycling during construction and demolition; and consider carbon footprint when sourcing and producing materials, prioritising locally sourced materials. Energy statements for developments will also be required to demonstrate improvements in energy performance, and whole-life assessments of the materials used for proposals of 50 or more dwellings and/or 5,000sqm or more for non-residential floorspace will be required. Overall, a major positive impact on climate change (SA Objective 1) is identified to recognise the potential for improved energy efficiency and the reduction in GHG emissions associated with the construction of development. Furthermore, minor positive impacts on pollution, natural resources and waste are also identified (SA Objective 6, 7 and 8).

E.6.7 Policy G: Climate resilient design

Draft Policy G: Climate resilient design

In order to ensure that new development and changes to existing buildings are resilient and flexible to future changes in climate, proposals will demonstrate the following in their design:

- Applying the cooling hierarchy (below) in building design to minimise and prevent overheating and avoid the need for mechanical ventilation/cooling;

1. **Passive design** – using energy efficient design to reduce the amount of heat entering the building in the warmer months. This can be achieved through appropriate orientation, overhangs and shading, albedo, fenestration, insulation and green roofs. Heat can also be reduced within the building through high ceilings and exposed internal mass; however, provision must be made for night purging of heat through secure ventilation. Such ventilation should be closable to preserve air tightness in cold weather.

2. **Passive / natural cooling** – using outside air to ventilate and cool a building without using a powered system.

3. **Mixed mode cooling** – using a mixture of both passive cooling methods and:

- a. Mechanical cooling, such as fan powered ventilation (preferred option)
- b. Air conditioning (not preferred option due to being energy intensive).

4. **Full building mechanical ventilation / cooling system using the lowest carbon / energy options** – only to be considered after all other elements of the hierarchy have been considered.

- Optimising the use of permeable hardscapes and multi-functional green and blue infrastructure for local flood risk management, reducing the risk of overheating, particularly the heat island effect, to providing access to cool/shaded outdoor spaces, in accordance with the Green and Blue Infrastructure Policy and Greening Factor requirements; and
- Minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SUDs in accordance with the Reducing Flood Risk Policy and future SUDs guidance (to be developed); and
- Incorporating water efficiency measures, encouraging the use of grey water and rainwater recycling, in accordance with the Water Efficiency Policy.

All proposals for new development and changes to existing buildings will be required to complete a climate change checklist to demonstrate how climate change risk has been addressed in their design. Part V (Climate Change and Adaptation and Mitigation) of the Stratford District Council Development Requirements SPD already requires completion of climate change checklist, but this would be a new requirement for Warwick District Council. The Climate Change Checklist will be developed for the next Regulation 19 (publication) stage of the Local Plan.

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

- E.6.7.1 Policy G sets out measures to ensure that resilient design is integrated into development, by ensuring building performance can be optimised by adapting to current and future climate conditions, such as through implementing energy efficient designs and reducing the impacts of development on the natural environment. The policy also requires proposals for new development to complete a climate change checklist, introducing this requirement to new development within Warwick District Council's administrative area, where the requirement is already implemented within the Stratford District Council SPD. Resilient design and following the cooling hierarchy which is set out within the policy will help to increase energy efficiency, reduce heat lost to the environment and ensure sustainable construction principles are followed. Overall, the policy will be expected to have a major positive impact on climate change (SA Objective 1).
- E.6.7.2 The policy states that the design of new development will include green and blue infrastructure, which will provide multi-functional benefits and ecosystem services such as: helping to mitigate extreme temperatures and flooding; pollution reduction; habitat protection and creation; and providing spaces for recreation which can benefit the mental and physical wellbeing of residents. The policy will also incorporate SuDS into development and locate development in low areas of flood risk. Overall, a major positive impact on flooding (SA Objective 2) and a minor positive impact on local biodiversity, pollution and health (SA Objectives 3, 6 and 10) is identified.
- E.6.7.3 Through incorporating opportunities for grey water and rainwater recycling, the policy will be expected to result in an efficient use of water resources. A minor positive impact on natural resources is therefore identified (SA Objective 7).

E.6.8 Policy H: Water efficiency

Draft Policy H: Water efficiency

- New residential development of one dwelling or more will be required to meet a water efficiency standard of 100litres per person per day using a fittings-based approach (as opposed to the calculation method). This approach provides a clear flowrate and volume metric for each fitting or appliance. Proposals that go further than this will be particularly encouraged.
- New non-residential development greater than 1000sqm will be required to meet the BREEAM "excellent" standard for water consumption representing at least 4 credits under the "Wat01" measure. Proposals that go further than this will be particularly encouraged.
- All residential dwellings with garden areas, must include a rain harvesting water butt(s) of minimum capacity of 200l, connected to a downpipe.
- Major development should consider greywater recycling systems, particularly shared/communal systems.
- All development proposals that involve change of use or redevelopment of a building, or an extension to an existing building should demonstrate that water efficiency measures using a fittings-based approach and rainwater harvesting measures have been incorporated wherever possible to reduce demand on mains water supply.
- Support will be given to proposals for irrigation water storage reservoirs for agricultural and horticultural purposes. All proposals should consider landscape and the natural environment in their design (in line with policies in the Natural Environment section).

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

- E.6.8.1 Policy H will help to reduce pressure on water resources within the SWLP area to account for current and future climate conditions, such as challenges from increased rainfall and a higher frequency of drought events.
- E.6.8.2 The policy sets out measures such as reduced water usage standards for new development and water efficiency methods including greywater recycling systems, rainwater harvesting and water storage reservoirs. In combination, these measures will help to reduce pressure on water quality, ensure an efficient use of water resources and reduce the cumulative carbon impact within the Plan area, through ensuring less energy is used to treat and pump water. A minor positive impact is identified for pollution and natural resources (SA Objective 6 and 7).
- E.6.8.3 The policy also states that *“all proposals should consider landscape and the natural environment in their design”*. It is recommended that stronger wording is given in relation to the landscape and the natural environment, making reference to the benefits water resources and natural river habitats and other waterbodies can provide to the natural environment. The policy could incorporate wording on green/blue infrastructure and soft landscaping to clearly define how water resource management measures can be effectively incorporated within the design of development.
- E.6.8.4 The policy will also be expected to reduce the likelihood for adverse effects on biodiversity, where promoting an efficient use of water resources can protect biodiversity designations that are sensitive to changes in water quantity. Therefore, a negligible impact is identified for biodiversity (SA Objective 3).

E.6.9 Policy I: Water supply and wastewater infrastructure

Draft Policy I: Water supply and wastewater infrastructure
<p>All development proposals will:</p> <p>Ensure that there is adequate water supply to serve the development.</p> <p>Minimise the need for new water supply infrastructure by directing development to areas where there is a guaranteed and adequate supply of water, having due regard to Severn Trent Water’s Resources Management Plan and Strategic Business Plan as well as findings of the Water Cycle Study.</p> <p>Avoid surface water connections into existing surface water and combined sewer networks and manage runoff through suitably designed SuDS schemes.</p> <p>Provide an Outline Drainage Strategy to demonstrate the wastewater assets required, their locations including any points of connection to the public foul sewerage, whether the site drainage will be adopted by the water company and if any sewer requisitions will be required.</p> <p>Ensure that water quality and the ability for watercourses to reach ‘good status’ is not impeded by the development, in accordance with the Water Framework Directive and as set out in the Rivers Severn, Humber and Thames River Basin Management Plans (RBMP).</p>

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

E.6.9.1 Policy I will ensure that new development as a result of the SWLP will not result in a strain on water supply and the wastewater network.

E.6.9.2 The policy states that development will not impede on the ability of watercourses to reach ‘good status’ and that there is adequate water supply to serve new development. This will direct development to areas where there is a guaranteed supply of water, therefore reducing the need for new water supply infrastructure. A drainage strategy will be required for new development and SuDS schemes will also be implemented, with benefits to flood management. Protecting water quantity and water quality through the policy is likely to reduce adverse effects on local biodiversity, specifically biodiversity sites which are sensitive to changes in water quantity or water quality. Overall, minor positive impacts on flood risk, water quality and natural resources are identified (SA Objective 2, 6 and 7) and a negligible impact is identified on local biodiversity (SA Objective 3).

E.6.10 Policy J: Reducing flood risk

Draft Policy J: Reducing flood risk

New development should be prioritised to areas of lowest flood risk, i.e. the areas that are least prone to flooding in event of heavy rains or storms and must not increase flood risk elsewhere. This should consider the risk from all sources including fluvial, surface water, groundwater and sewer flood risk, making use of the Strategic Flood Risk Assessments (SFRA), available public mapping such as the Flood Map for Planning and the Flood Risk from Surface Water map and historic flood information (which is available from the Lead Local Flood Authority (LLFA) and other partners).

Flood risk should be considered proportionately for all development. A site-specific Flood Risk Assessment will be required to support planning applications for major developments or those in areas at risk of flooding, in order to demonstrate that the risk both within the site and to surrounding/downstream sites is not increased. Submitted Flood Risk Assessments should refer to the recommendations of the latest SFRA and Warwickshire County Council’s Local Flood Risk Management Strategy. Notwithstanding the requirement for a Flood Risk Assessment for major developments to be submitted, all developments will require a drainage strategy which demonstrates how surface water will be managed in accordance with the drainage hierarchy and flood risk will not be increased downstream.

New development proposals must account for climate change in their plans to ensure that the site will be safe over its lifetime. This should consider the potential for exceedance events, for example due to extreme events beyond design standards or through failure of assets, and how such overland flows are directed safely through a development without exposing new or existing property to greater flood risk.

A sequential approach to the layout of the development should be taken so that buildings and access routes are located in areas of lowest flood risk. Modification of ground levels/compensation works may be undertaken in order to reconfigure land located within flood zone 3a. However, modifications to increase land available for development is not permitted. With any changes in ground levels, detailed consideration should be given to exceedance/overland flow routes.

For development located in areas at risk of flooding, mitigation measures should be provided up to the 1% annual probability plus climate change flood event. Safe access and egress must also be demonstrated.

Draft Policy J: Reducing flood risk

Finished floor levels in areas at risk of flooding should be set no lower than 600mm above the 1% annual probability plus climate change flood level.

All new developments should contribute to creating space for water through use of blue and green infrastructure, and where relevant, restoring functional floodplains (flood zone 3b). New developments should also seek opportunities for river restoration and enhancement, e.g. de-culverting, removing structures and reinstating a natural, sinuous river channel. As a minimum all developments are required to provide an 8m wide undeveloped buffer strip from the watercourse (from the top of the bank or the centreline of the culvert) to allow access for routine maintenance and emergency clearance.

In terms of the risks to traditional buildings from flooding, care must be taken not to introduce inappropriate retrofitted measures which would prevent effective drying and shorten the life of the building.

All new development should not detrimentally impact upon existing and planned flood risk management schemes.

Land that is required for current and future flood management will be safeguarded from development.

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

E.6.10.1 Policy J seeks to avoid locating site end users in areas at increased risk of flooding and ensures that development accounts for current and future flood risk, including measures which will increase resilience to the impacts of climate change.

E.6.10.2 The policy will ensure development is prioritised in areas at low risk of flooding and requires a site-specific Flood Risk Assessment is undertaken for major developments or development identified to be at risk of flooding. Furthermore, a drainage strategy will also be required to ensure that flood risk is not increased downstream and that surface water will be managed. New development will be required to account for climate change within their plans and ensure that potential exceedance events are considered. Mitigation measures for development located in areas at risk of flooding will be required, however it is recommended the policy clearly sets out a strategy for mitigation within development design. Overall, a major positive impact on flood risk (SA Objective 2) and a minor positive impact on climate change (SA Objective 1) is identified.

E.6.10.3 Through the use of GI and BI, restoring flood plains, and river restoration and enhancement, it is expected that the quality of watercourses within the SWLP area will be protected and potentially enhanced. Furthermore, an 8m wide undeveloped buffer strip from a watercourse is required as minimum for all development, protecting watercourses from pollution associated with the construction and operation of development. The protection and enhancement of watercourses is likely to also benefit local wildlife and ecological corridors. Overall, minor positive impacts on local biodiversity and water quality are identified (SA Objectives 3 and 6).

E.6.11 Policy K: Multifunctional sustainable drainage systems (SuDS)

Draft Policy K: Multifunctional sustainable drainage systems (SuDS)

In all development the proposed drainage scheme performance should be able to demonstrate no flooding, from all sources, to properties up to and including the 1% annual exceedance probability event (AEP), plus the appropriate allowance for climate change. Development should not be permitted where there is an increase in flood risk to the site or surrounding area.

High-quality sustainable drainage systems (SuDS) should be implemented proportionately at all scales of development to manage surface water run-off. This should be demonstrated through submission of a suitably detailed drainage strategy. SuDS features must be well designed and provide the development with multiple benefits such as, but not limited to, biodiversity, water quantity, water quality and amenity value. For this reason, SuDS features should be above-ground and manage surface water runoff at source by dispersing SuDS throughout the development. Adequate space should be provided throughout the development for these features.

The Drainage Strategy shall demonstrate application of the discharge hierarchy as per the NPPF 2024 with SuDS features built in accordance with the CIRIA C753 SuDS Manual and Warwickshire County Council Flood Risk Guidance for Development. The surface water drainage network must be kept separate from the foul drainage network and connecting surface water to a foul network is unacceptable, as it does not follow the discharge hierarchy. Where a brownfield site is redeveloped, the opportunity to disconnect surface water and highway drainage from combined sewers must be taken.

Surface water discharge rates should be limited to the QBar greenfield runoff rate for all modelled rainfall events up to and including the 1% annual probability event plus the appropriate allowance for climate change, unless otherwise agreed with the LLFA. Run off should be managed as close to where it falls as possible.

SuDS features should be situated outside of any areas of known or modelled flood risk from rivers or surface water. Where the development includes existing watercourses, the risk of river flooding should be fully appraised. This may require applicants to undertake an independently-reviewed hydraulic modelling exercise where existing modelling data is absent or of low quality.

Applicants should give early consideration to overland and flow routing when considering the development layout. Development layout should be sympathetic to any existing watercourse and overland surface water flow routes, using effective master planning to mitigate flood risk. Blue green corridors should be retained and enhanced to provide a buffer from the built environment, enhance water quality and biodiversity, and create open spaces of amenity.

Development proposals will be required to protect and improve the quality of water bodies in and around the county, and any SuDS scheme should look to complement the surrounding water environment

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

- E.6.11.1 Policy K outlines the requirements development must follow for surface water management, including the provision of sustainable drainage systems (SuDS). SuDS are to be provided and demonstrated through a detailed drainage strategy, designed in accordance with relevant guidance such as CIRIA C753 SuDS Manual¹⁵ and Warwickshire County Council Flood Risk Guidance for Development¹⁶. Through managing existing drainage systems and incorporating SuDS into development, including making allowances for climate change, a major positive impact on flood risk (SA Objective 2) and a minor positive impact on climate change is identified (SA Objective 1).
- E.6.11.2 The policy will encourage opportunities to be sought for integrating the multi-functionality of SuDS into development design. This is likely to lead to benefits to water quality and biodiversity through the integration into the wider blue and green infrastructure network and natural management of flood water. Further amenity benefits may be seen in terms of the appearance and character of the local area. Overall, the multi-functionality of SuDS will be likely to lead to minor positive impacts for biodiversity, landscape and water quality (SA Objective 3 and 6).

¹⁵ CIRIA (2015) The SuDS Manual (C753). Available at: <https://www.ciria.org/ItemDetail?iProductCode=C753> [Date accessed: 06/11/24]

¹⁶ Warwickshire County Council (2023). Flood Risk Guidance for Development. Available at: <https://api.warwickshire.gov.uk/documents/WCCC-453486374-170> [Date accessed: 06/11/24]

E.7 A well designed and beautiful South Warwickshire

E.7.1 Policy Direction 25: Strategic design principles

Draft Policy Direction 25: Strategic design principles

South Warwickshire’s strategic design principles will encompass:

Designing adaptable, diverse, and flexible places.

This will include the following principles:

- Creating distinctive and varied neighbourhoods which provide for local needs.
- Ensuring a mix of land uses to provide for local needs.
- Considering mix and amount of development and getting the right range of complementary uses.
- Ensuring a range of densities within settlements that are appropriate to the function and local character of the place.
- Ensuring development is designed and delivered in a comprehensive and coordinated way.

Creating safe and attractive streets and public spaces.

- Creating attractive places where people want to be
- Creating places which enhance local character, the historic built environment, and landscape setting
- Street design will be considered in conjunction with other policy topics such as green infrastructure, climate adaptation, creating healthy places, and the 20-minute neighbourhood concept, providing a foundation for further details in design codes.
- Ensuring that layout and orientation create an environment that feels safe and secure to be in, with the needs of pedestrians and cyclists prioritised over vehicle movements.

Providing healthy and inclusive communities.

- This will ensure that the built environment provides healthy and inclusive communities through spatial planning.
- The policy will help support and provide for community needs through appropriate physical and social infrastructure, as well as making sure there is sufficient land provision for play, sport, and recreation.

The principles of the 20-minute neighbourhood.

The way settlements are laid out can impact on people’s travel choices. For settlements to be sustainable, it is beneficial to maximise any opportunities for people to be able to meet their regular day to day needs within a reasonable walking distance of their homes.

Environmental Sustainability and adapting to climate change.

- Development will be considered in conjunction with necessary environmental-related adaptation and mitigation measures.

Where they exist, the strategic design policy will refer to, and require compliance with, relevant design codes.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
25	+	0	0	+	+	+	0	0	0	+	+	0	0

E.7.1.1 Policy Direction 25 provides strategic design principles for development to follow. The strategic design principles include designing adaptable, diverse and flexible places that consider the density of the proposed development and ensure it is appropriate to the function and local character of a place. Furthermore, development through the strategic design principles will be expected to create safe, attractive places that “*enhance local character, the historic built environment, and the landscape setting*”. Policy Direction 25 will be expected to have a minor positive impact on landscape character and cultural heritage (SA Objectives 4 and 5).

E.7.1.2 The policy will encourage development to support the 20-minute neighbourhood concept¹⁷ and will also prioritise active travel methods such as cycling over vehicle use. This is anticipated to support more active lifestyles through encouraging sustainable transport use and provide local services within walking distance, which is expected to reduce the reliance on private car use and ultimately reduce vehicle-related emissions. Furthermore, the policy will support community and social infrastructure such as open space for play, sport and recreation. Overall, pursuing the 20-minute neighbourhood concept and ensuring development supports social cohesion and community engagement will be expected to result in minor positive impacts on climate change, pollution, health and accessibility (SA Objectives 1, 6, 10 and 11).

E.7.2 Policy Direction 26: Design codes

Draft Policy Direction 9.2: Design codes

The South Warwickshire Local Plan will have a series of design codes, covering a range of geographical areas and in varying levels of detail. All Design Codes will be created using the National Design Guide’s ‘Ten characteristics of well-designed places’, but in general, codes covering smaller geographical areas are likely to be more detailed in their requirements.

Types of Design Codes:

- Area- wide design codes.
- Site-specific design codes.
- Densification design code.
- Settlement specific design codes.

The overarching framework used for the development of Design Codes will be the National Design Guide’s ‘Ten characteristics of well-designed places’. The ten characteristics have been chosen as they all contribute towards the cross-cutting themes for good design, as set out in the NPPF.

The National Design Guide’s Ten Characteristics of well-designed places:

1. Context- enhances the surroundings.
2. Identity- attractive and distinctive.
3. Built form- a coherent pattern of development.
4. Movement- accessible and easy to move around.
5. Nature- enhanced and optimised.
6. Public spaces- safe, social, and inclusive.
7. Uses- mixed and integrated.
8. Homes and buildings- functional, healthy, and sustainable.
9. Resources- efficient and resilient.
10. Lifespan- made to last.

Summary of intended design codes:

¹⁷ TCPA (2021). 20-minute Neighbourhoods. Creating Healthier, Active, Prosperous Communities an Introduction for Council Planners in England. Available at: https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf [Date accessed: 01/11/24]

Draft Policy Direction 9.2: Design codes			
Code Type:	Likely Number:	Likely Adoption:	Leading Production:
Area-wide	1	Alongside SWLP adoption	SWLP Team
Site-specific	1-10 (allocations dependent)	Most, or all, adopted after SWLP adoption	SWLP Team
Densification	1	Alongside SWLP adoption	SWLP Team
Settlement specific	20+	Throughout the plan period	Neighbourhood Planning Groups

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
26	+	0	+	+	0	+	+	0	+	+	+	0	0

E.7.2.1 Policy Direction 26 outlines the various types of design codes that will be presented across the SWLP area. The design codes will follow the ‘Ten characteristics of well-designed places’ within the National Design Guide¹⁸.

E.7.2.2 Through the use of the National Design Guide, the policy will ensure that development compliments its surroundings and setting, ensuring that development is accessible and attractive, resulting in benefits to the local landscape and encourage active modes of travel. Furthermore, development will be required to be inclusive, provide public spaces that are safe and homes that are sustainable, which will promote healthy lifestyles through access to outdoor space and will ensure homes are designed to meet the varying needs of residents. Development is also expected to enhance and optimise the natural environment, incorporate lasting design and be resource efficient. This will be expected to preserve undeveloped land which likely serves as natural habitats for local wildlife as well as potentially increasing energy efficiency of buildings over their lifetime and potentially reducing overall GHG emissions within the construction and operation of development. Overall, minor positive impacts have been identified across multiple topic themes including climate change, biodiversity, landscape, pollution, natural resources, housing, health and accessibility (SA Objectives 1, 3, 4, 6, 7, 9, 10 and 11).

¹⁸ DLUHC (2021). National Design Guide. Available at: https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf [Date accessed: 05/11/24]

E.7.3 Policy Direction 27: Protecting and enhancing heritage assets / the historic environment

Draft Policy Direction 27: Protecting and enhancing heritage assets / the historic environment

The Policies contained within the existing local plans continue to be suitable. A strategic historic environment policy will:

- Preserve and enhance the historic environment (including its setting) for its inherent value, and for the enjoyment of residents and visitors.
- Proposals that positively and proactively, conserve and enhance the historic environment, will be supported. This includes safeguarding assets and supporting appropriate, viable and sustainable uses that conserve their significance.
- Prevent development if it results in substantial harm to or total loss of the significance of a designated heritage asset, unless it is demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- Where development does take place, proposals will be high quality, sensitively designed and integrated with the historic context.
- Support sustainability initiatives for heritage assets to the extent practicable without undermining the significance of the heritage asset. Sustainability measures within heritage assets will consider the provisions of the 'Reducing Energy Consumption in Existing Buildings policy.
- Particular attention will be paid to the conservation of those elements which contribute most to distinctive character and sense of place of the area. These Include:
 - Designated Heritage Assets
 - Listed buildings, conservation areas, Registered Parks and Gardens of Special Historic Interest, Registered Battlefields, scheduled monuments and sites of archaeological importance
 - Non-designated Heritage Assets
 - Heritage at Risk
 - Historic Townscapes and street scene
 - Stratford, Warwick etc,
 - Market Towns, villages and hamlets
 - Historic landscapes
 - Including features reflecting the historic interaction of human activity on the landscape

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
27	+	0	0	+	++	0	0	0	0	0	0	0	0

E.7.3.1 Policy Direction 27 will be expected to ensure that the historic character and heritage assets and their settings which contribute to the local distinctiveness across the SWLP area will be protected and opportunities for enhancement explored.

E.7.3.2 The policy will ensure that development will be of high quality design that is sensitive to the historic environment. Historic assets often contribute to the wider landscape character and sense of place and will therefore protect local distinctiveness. Development that will support sustainability initiatives for heritage assets will also be supported, including aims to reduce energy consumption. Overall, a major positive impact on cultural heritage is identified (SA Objective 5) and a minor positive impact is identified for climate change and landscape character (SA Objectives 1 and 4).

E.7.4 Policy Direction 28: Waterways

Draft Policy Direction 28: Waterways

- The plan will seek to increase access and use of canals and navigable waterways. This will include the provision of moorings and marinas where it respects and works with the natural features and function of the watercourse and where adequate services and facilities are available. This will also include the use of waterways as routes for active travel.
- Any proposed extension to or creation of new navigable waterways must ensure there are no overall detrimental impacts on the natural environment.
- Developments that affect the potential for unnavigable waterways to be unlocked or prevent future use of the network will be resisted.
- The ecological benefits of waterways, will be acknowledged and prioritised
- Development that adversely impacts the waterways will be resisted;
 - This includes adverse impacts to the integrity of the waterways structure, water quality, the landscape, heritage and ecological quality and character.
- Development that supports the regeneration of canals and would improve access and sense of place will be supported.

Policy Direction	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
28	0	0	+	+	+	+	0	0	0	0	+	0	0

E.7.4.1 Policy Direction 28 aims to protect and enhance canals and waterways within the SWLP area. The policy requires development to ensure there is no detrimental impact on the natural environment, water quality, or potential to impact the access of waterways. The policy will prioritise the ecological benefits of waterways and increase access and use of canals and waterways, including as routes for active travel and habitat corridors. Overall, minor positive impacts on local biodiversity, water quality and sustainable travel are identified (SA Objectives 3, 6 and 11).

E.7.4.2 The policy will resist development that could result in adverse impacts on the structure of waterways including the landscape character and heritage. Furthermore, developments which support “*the regeneration of canals and would improve access and sense of place will be supported*”. Minor positive impacts on the local landscape and heritage character that are supported by waterways will be expected (SA Objectives 4 and 5).

E.8 A healthy, safe and inclusive South Warwickshire

E.8.1 Policy Direction 29: Pollution

Draft Policy Direction 29: Pollution

- Development should seek to minimise pollution and where possible contribute to the protection and improvement of the quality of air, land, and water. In achieving this, development should be designed from the outset to improve air, land and water quality and promote environmental benefits.
- Development that, on its own or cumulatively, would result in significant air, light, noise, dust, land, water or other environmental pollution or harm to amenity, health well-being, or safety will only be permitted if the potential adverse effects can be mitigated to an acceptable level, as set by the legal requirements or other environmental controls at the time of development, or by measures included in the proposals. It should also be ensured that new development proposals do not have an adverse impact on existing operations.
- Development that would lead to deterioration or may compromise the ability of a water body or underlying groundwater to meet good status standards required by the Water Framework Directive will not be permitted.
- Areas which are within Air Quality Management Areas (areas where air quality is a particular issue) will be protected, requiring air quality assessments, and where necessary, a mitigation plan that will need to demonstrate that practical and effective measures have been taken to avoid any adverse impacts.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
29	+	0	+	0	0	++	0	0	0	+	0	0	0

E.8.1.1 Air pollution is a significant concern internationally and locally. There are four designated AQMAs within the SWLP area which includes ‘Studley AQMA’, ‘Stratford-on-Avon District Council (No 1) 2010 AQMA’, ‘Leamington Spa AQMA’ and ‘Warwick AQMA (Amended 2008)’. Development within an AQMA would make it more difficult to meet national air quality objectives within the AQMA.

E.8.1.2 Policy Direction 29 seeks to minimise pollution and contribute to the protection and improvement of air, land and water quality. The policy states that development which could result in significant air, light, noise, dust, land and water pollution will only be permitted where mitigation can reach acceptable levels in line with national requirements. The requirements set out in the policy will help to minimise the SWLP area’s contributions to climate change. Improvements to air quality through the policy requirements will also benefit human health and protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. Furthermore, development that could lead to deterioration in or compromise to the quality of a water body will also not be permitted. Overall, a major positive impact on pollution is identified (SA Objective 6) and a minor positive impact is identified for climate change, biodiversity and health (SA Objectives 1, 3 and 10).

E.8.2 Policy Direction 30: Health Impact Assessment for major development

Draft Policy Direction 30: Health Impact Assessment for major development

All major development (proposals, and developments resulting in the loss of educational, health, leisure and community facilities, or public open space, will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:

- Health Impact Assessment Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing; or
- Health Impact Assessment where significant impacts on health and wellbeing would arise from that proposal.

The policy will require a HIA of development proposals to a level of detail appropriate to its scale and nature and addressing the relevant elements of healthy design.

Developments which have a significant negative impact on health and wellbeing will not be supported where applicants cannot provide mitigation of, or compensation for such impacts through planning conditions and/or financial/other contributions secured through planning obligations.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
30	0	0	0	0	0	0	0	0	0	++	0	+	0

E.8.2.1 Policy Direction 30 sets out the requirement for major development proposals to undertake a Health Impact Assessment Screening Report or a Health Impact Assessment to help ensure that opportunities for promoting healthy lifestyles are maximised.

E.8.2.2 By requiring major developments to submit an HIA, this policy will help to ensure development proposals do not have direct adverse impacts on: residents’ physical or mental health; social, economic and environmental living conditions; demand for or access to health and social care services; or an individual’s ability to improve their own health and wellbeing. Therefore, this policy is likely to have a major positive impact on health (SA Objective 10). Negligible impacts have been identified in relation to education (SA Objective 12) where education facilities are sought to be protected and thus not resulting in any adverse impacts in relation to education.

E.9 A well connected South Warwickshire

E.9.1 Policy Direction 31: Sustainable transport accessibility

Draft Policy Direction 31: Sustainable transport accessibility

Encourage sustainable transport modes:

Development proposals should prioritise access to public transport, walking, and cycling routes. All new developments must be designed to support integrated and accessible transport options, ensuring safe and good connectivity to key destinations such as employment areas, schools, retail centres, and leisure facilities.

Infrastructure provision:

Proposals must demonstrate how they will incorporate or contribute to high quality infrastructure that facilitates sustainable travel. This includes:

Provision of cycle lanes, pedestrian paths, and public transport facilities.

Secure, safe, and convenient cycle parking and storage in residential and commercial developments.

Charging infrastructure for electric vehicles, including provisions for electric bikes and scooters.

Public transport links should be integrated into the development with appropriate stops, routes, and frequency.

Travel plans and assessments:

Major developments must provide a travel plan that outlines how sustainable travel options will be encouraged and how the impact on the local transport network will be mitigated.

Reducing car dependence:

Developments should aim to minimise car dependency by ensuring that parking provision is balanced.

Measures should be included to encourage reduced car ownership and usage, such as car sharing schemes and the inclusion of mobility hubs.

Access for all:

Developments must ensure that sustainable transport options are inclusive and accessible to all users, including people with disabilities, elderly people, and those with reduced mobility and low income.

Policy Direction	1 Climate Change	2 Flood Risk	3 Biodiversity & Geodiversity	4 Landscape	5 Cultural Heritage	6 Pollution	7 Natural Resources	8 Waste	9 Housing	10 Health	11 Accessibility	12 Education	13 Economy
31	++	0	0	0	0	+	0	0	0	+	++	+	+

E.9.1.1 Sustainable transport provision can provide multiple benefits to residents and the wider SWLP area, including improved connectivity to local services, reduced congestion on roads which will improve air quality and facilitate healthier lifestyle choices. Policy Direction 31 aims to ensure that sustainable transport principles are provided within the SWLP area and that infrastructure is in place to meet transport demands.

- E.9.1.2 The policy requires major developments to provide a travel plan that outlines how sustainable travel options will be encouraged as well as any mitigation of expected impacts on the local transport network will be achieved. Furthermore, the policy outlines the necessary infrastructure provision to accompany development, including cycle lanes, pedestrian paths and public transport links such as appropriate stops, routes and frequency of services. Adaptation to climate change is also pursued through the policy by the provision of charging infrastructure for electric vehicles which includes electric bikes and scooters. A reduction in private car use is expected as a result of the provision of sufficient infrastructure and the promotion of safe, accessible areas for active travel. Overall, a major positive impact is identified for climate change and accessibility (SA Objectives 1 and 11) and a minor positive impact is identified for pollution and health (SA Objectives 6 and 10).
- E.9.1.3 The policy also requires good connectivity to local services, including employment areas and schools, through “*integrated and accessible transport options*”. Minor positive impacts are identified for access to education and employment (SA Objectives 12 and 13) as a result.
- E.9.1.4 It is recommended that the policy includes wording to ensure infrastructure provision does not result in adverse impacts on the landscape character, local biodiversity or the surrounding historic environment. Where adverse impacts are unavoidable, appropriate mitigation should be incorporated accordingly to minimise the extent of the impact.

E.9.2 Policy Direction 32: Electric Vehicle (EV) Infrastructure Strategy

Draft Policy Direction 32: Electric Vehicle (EV) Infrastructure Strategy

South Warwickshire has a responsibility to install Electric Vehicle Infrastructure (EVI) to work towards meeting the demand that is coming because of the switch to EV. This is largely off-street land owned by the Councils and largely consists of public off-street car parks and social housing areas. The anticipated EVI need for the area is significantly greater than the current provision, which will partly be met by Warwickshire County Council (WCC) with on-street charging and partially by the private sector, but there is a place for WDC & SDC in this as the landowner of the car parks. In June 2022, a report entitled South Warwickshire EV Infrastructure Strategy was produced and this recommended that WDC & SDC should ensure a fair transition to EV's by contributing to the WCC vision and steering public charge point development towards locations where private sector is unlikely to deliver. The strategy should be based on two principles:

1. Providing standard and fast charge point infrastructure in council car parks near to residential areas
2. Enabling a geographical and socially inclusive transition to EVs by addressing the social housing charge point infrastructure

A Feasibility Study has been commissioned and with the results of that, a pre-market engagement exercise will take place to understand the EV infrastructure market and have all the available information to gain permission to procure for an EV infrastructure provider.

Alongside the responsibilities that WDC & SDC have for the installation of EV chargers on their own land, there needs to be robust policies to require EV charging infrastructure for new developments through the planning process and build on the current respective Supplementary Planning Documents (SPDs) from WDC and SDC. Any policy needs to ensure that it is contributing to South Warwickshire's Climate Change ambitions.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
32	+	0	0	0	0	+	0	0	0	+	+	0	0

E.9.2.1 Policy Direction 32 supports the transition to electric vehicles (EV) through setting out the strategy to implement the necessary infrastructure needed, where current EV infrastructure is not sufficient to meet the anticipated need. WDC and SDC will aim to install EV chargers on their own land and further set out the need for policies to require EV charging infrastructure to be provided alongside new development. Facilitating the transition to EVs will help contribute to South Warwickshire’s climate change ambitions.

E.9.2.2 EVs, which offer an efficient alternative to petrol and diesel-powered vehicles (primarily because they do not emit air pollutants such as PM₁₀), has the potential to result in a minor positive impact on human health (SA Objective 10) through improving air quality. Through facilitating the uptake of EVs through necessary infrastructure, the policy will help to reduce vehicle-related GHG emissions and their associated contributions towards climate change. Overall, this policy is expected to have a minor positive impact on climate change, pollution and sustainable transport (SA Objectives 1, 6 and 11).

E.9.2.3 It is recommended that the policy provides wording to ensure that electric vehicle charging infrastructure is designed and located in areas which will not result in an adverse impact on landscape character, local biodiversity or the surrounding historic environment. Where adverse impacts are unavoidable, appropriate mitigation should be implemented accordingly.

E.9.3 Policy Direction 33: Road, travel, employment and freight

Draft Policy Direction 33: Road, travel, employment and freight
<ul style="list-style-type: none"> • New employment development that enables and promotes accessibility through the use of active and low-carbon transport journeys will be supported. • In accordance with NPPF paragraph 118, all developments that will generate significant amounts of movement will be required to provide a Travel plan, and the planning application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed. • Development that helps to reduce the carbon impact of freight and employment related vehicle movements will be supported; for example, through the provision of vehicle charging infrastructure. • The use of electric vehicles to transport freight and the development of infrastructure to support this will be supported. Last mile deliveries via low carbon transport (i.e. electric vans/lorries) will be particularly encouraged.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
33	+	0	0	0	0	+	0	0	0	+	+	0	0

E.9.3.1 Road transport is a major source of air pollution and GHG emissions in the UK¹⁹. Policy Direction 33 aims to support more sustainable transport related to employment and freight related road travel, requiring development with significant levels of associated travel to provide a travel plan to outline the impacts of movement. The policy sets out measures to reduce the carbon impact of freight and employment related travel, for example through the provision of vehicle charging infrastructure. The policy will also encourage the use of electric vehicles to transport freight and encourage the use of electric vans or lorries to complete last mile deliveries. The policy will help to reduce adverse effects associated with transport related emissions, leading to minor positive impacts on climate change and pollution (SA Objectives 1 and 6).

E.9.3.2 The measures set out in the policy will benefit the health of residents, through improving air quality within the SWLP area. Furthermore, the policy promotes accessibility and encourages new employment development to facilitate the use of active travel, encouraging employees to travel to work via more sustainable modes of travel. The policy is therefore expected to result in a minor positive impact on health and accessibility (SA Objectives 10 and 11).

E.9.4 Policy Direction 34: Vale of Evesham Control Zone

Draft Policy Direction 34: Vale of Evesham Control Zone

Warwickshire County Council have raised concerns about the removal or amendment of the policy. As such, it is proposed that the policy remains until an alternate approach is agreed.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
34	+	0	0	0	0	+	0	0	0	+	0	0	0

¹⁹ ONS (2019) Road transport and air emissions. Available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16> [Date accessed: 08/11/24]

E.9.4.1 It is recommended that a policy relating to the Vale of Evesham Control Zone is retained and included in the SWLP given the key transport links provided by the A46 in this area. These links support flows of HGVs between the M5 to central and eastern transport corridors, such as the M6 and the M1, and is therefore in need of protection particularly where this will be further affected by development associated with the SWLP.

E.9.4.2 As Policy Direction 34 seeks to retain a policy relating to the Vale of Evesham Control Zone minor positive impacts have been identified in relation to climate change, pollution and health (SA Objectives 1, 6 and 10), where a controlled movement of HGVs has the potential to reduce levels of emissions and air pollutants release which will have a positive impact on local air quality and health as a result.

E.9.4.3 The assessment of this policy direction remains provisional at this time and will be revisited when its retention and/ or wording is finalised to fully account for the Vale of Evesham Control Zone.

E.9.5 Policy Direction 35: Smart cities

Draft Policy Direction 35: Smart cities

Technology developments and access to digital services such as the internet is critical to South Warwickshire’s economic, environmental and social development. Proposals for all new commercial and residential developments should include appropriate infrastructure, wired and wireless, to provide high speed internet access.

Provision of such connections should take into account:

- The need for inclusive approaches to create open and competitive services that are accessible by all.
- Efficiency such that enabling infrastructure is installed alongside and concurrent with utility connections with suppliers and providers being encouraged to create open infrastructures and share assets such as chambers, ducting and data networks.
- The need to provide for future flexibility to reflect increasing demands to provide connectivity and data traffic for a range of purposes.

The two Councils recognises that this is an area where technological change is rapid and therefore standards will evolve, and developers should seek to adopt the best current open technology standards available.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
35	+	0	0	0	0	0	0	0	0	0	0	0	+

-
- E.9.5.1 Policy Direction 35 sets out how technological developments can facilitate the smart city concept, which uses digital solutions to provide benefits to residents and wider economic, environmental and social benefits to South Warwickshire. The policy states that “*developers should seek to adopt the best current open technology standards available*” which will be likely to provide residents with high speed internet access and potentially increased employment opportunities. Through providing increased access to digital services and high speed internet access, it is expected that improvements to information sharing and digital connectivity will be likely. Therefore, providing benefits to local businesses and increasing opportunity for home working, which could result in less commuting by private car and an associated reduction in emissions. Overall, minor positive impacts on climate change and the local economy are likely (SA Objectives 1 and 13).
- E.9.5.2 It is recommended the policy provides further wording to ensure that “*enabling infrastructure*” is located in sustainable locations that do not impact landscape character, local biodiversity or nearby heritage assets and any unavoidable impacts are mitigated accordingly.

E.10 Natural environment

E.10.1 Policy Direction 36: Protection of sites, habitats and species

Draft Policy Direction 36: Protection of sites, habitats and species

The SWLP will include a policy to protect and enhance internationally, nationally, and locally important biodiversity and geodiversity sites and assets, both designated and non-designated, using the evidence-based documents such as the emerging Local Nature Recovery Strategy (LNRS) and the findings of the HRA as a guide.

The policy will cover:

Nationally Important and Protected Sites:

- Sites of Special Scientific Interest (SSSIs)
- National Nature Reserves
- Ramsar sites
- Special Areas of Conservation
- Special Protection Areas
- Sites identified for formal designation under the above schemes/categories

Locally Important Sites and Assets:

- Ancient woodland
- Ancient and Veteran trees
- Local Nature Reserves
- Local Wildlife Sites, including potential, and in certain instances rejected ones.
- Sites not yet subject to formal designation but known to make a positive contribution to biodiversity and/or geodiversity
- Irreplaceable habitats (as defined in the Biodiversity Gain Requirements (Irreplaceable habitat) Regulations 2024)
- Local Geological Sites
- Sites of geological or geomorphological importance
- Protected rare, endangered, or priority species, particularly those recognised in local biodiversity action plans

The policy will follow the principles outlined in the Lawton Report of more, bigger, better, and joined up. It will do this by:

- Protecting existing important sites and assets.
- Enhancing existing important sites and assets.
- Identifying opportunities to create and enhance habitat connectivity by identifying new sites for designation.
- Creating new habitats which support Warwickshire target species.

Policy Direction	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
36	+	+	++	+	0	+	0	0	0	0	0	0	0

E.10.1.1 Policy Direction 36 is anticipated to have a major positive impact for biodiversity and geodiversity (SA Objective 3) where it seeks to protect and enhance the international, national and local designated and undesignated biodiversity features in the Plan area. Through reference to the Local Nature Recovery Strategy (LNRS) and the Lawton Report, it is anticipated to reduce fragmentation of the ecological network to create joined up habitat and wildlife corridors throughout South Warwickshire.

E.10.1.2 Supporting both designated and non-designated biodiversity features in the Plan area, Policy Direction 36 is expected to lead to secondary minor positive impacts in relation to climate change, flood risk and pollution (SA Objectives 1, 2 and 6) where the multifunctional ecosystem service benefits associated with biodiversity features will support carbon sequestration, air filtration and natural means of flood alleviation. A minor positive impact is also anticipated for landscape (SA Objective 3) where supporting the LNRS will be expected to integrate GI across South Warwickshire, including in built-up areas, which will maintain the distinctive local landscape and townscape character.

E.10.2 Policy Direction 37: Local Nature Recovery Strategy

Draft Policy Direction 37: Local Nature Recovery Strategy

Development proposals will be expected to support the principles of LNRS and demonstrate that a positive contribution will be made to the regional nature recovery network by maintaining and enhancing local ecological networks through habitat creation, protection, enhancement, restoration and/or management.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
37	+	+	++	+	0	+	0	0	0	0	0	0	0

E.10.2.1 Through supporting nature recovery Policy Direction 37 will facilitate the expansion of the ecological network across the Plan area, incorporating more joined up networks of GI as well as wildlife and habitat corridors in the rural and built up parts of the SWLP area. Therefore, Policy Direction 37 will be expected to have a major positive impact on biodiversity (SA Objective 3).

E.10.2.2 As a result of the multifunctional ecosystem service functions associated with the maintaining and expanding the ecological networks in South Warwickshire, it is anticipated that this will result in minor positive impacts for climate change, flood risk and pollution (SA Objectives 1, 2 and 6) where carbon sequestration, air filtration and natural means of flood alleviation support a reduced contribution to climate change and minimise flood risk. A minor positive impact is also anticipated for landscape and townscape (SA Objective 4) where the LNRS will support the provision of nature and the ecological network in the built up areas of South Warwickshire.

E.10.2.3 It is recommended that this policy direction makes more specific reference to wording relating to the means through which developments could contribute to the LNRS, such as through reference to BNG and a Greening Factor, as referred to in Policy Direction 40, and their multifunctional benefits.

E.10.3 Policy Direction 38: Biodiversity net gain

Draft Policy Direction 38: Biodiversity net gain

All development proposals (unless exempt) must achieve a minimum of 10% BNG (or any higher percentage mandated through local or national policy/legislation) over the pre-development site value as measured by the DEFRA Statutory Biodiversity Metric.

Draft Policy Direction 38: Biodiversity net gain

As work on the SWLP progresses we will explore evidence to seek a higher percentage of BNG above the statutory 10% requirement to achieve greater biodiversity benefits.

Proposals should:

- Be supported by core biodiversity gain information;
- Be secured for at least a 30 year period from the substantive completion of the development;
- Be delivered in accordance with the approved habitat management and monitoring plan;
- Follow the mitigation hierarchy to avoid, minimise, mitigate, compensate/offset loss;
- Aim to achieve the required net gain onsite within the development boundary.

Where a proposal adequately demonstrates in the biodiversity gain plan that the mitigation hierarchy has been followed and the required net gain cannot be fully achieved onsite within the site boundary, it must secure alternative provision of the required biodiversity units through:

The purchase of registered offsite biodiversity units using the Local Nature Recovery Strategy as a guide and in line with the below locational hierarchy:

1. Within the Local Planning Authority area where the impact occurs
2. Within a neighbouring Local Planning Authority area
3. Within Warwickshire, Coventry and Solihull
4. Elsewhere in England

or as a last resort,

- The purchase of statutory biodiversity credits from the government.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
38	+	+	++	+	0	+	0	0	0	0	0	0	0

E.10.3.1 Policy Direction 38 ensures the need for any development proposal in the Plan area to meet the statutory biodiversity net gain (BNG) requirement of 10%, which will help to support local biodiversity. This will ultimately lead to the creation of a more joined up ecological network supporting local wildlife and habitat creation. The policy also directs those who are unable to meet the 10% on site BNG to the LNRS, which will help to guide developers in ensuring their BNG contributions are effective in supporting the biodiversity assets in and around South Warwickshire and the wider ecological network. Furthermore, adhering to the locational hierarchy will ensure, where possible, that the benefits of BNG are experienced as close to the development site as possible. As a result, a major positive impact has been identified for biodiversity and geodiversity (SA Objective 3).

E.10.3.2 BNG is anticipated to have wider multifunctional benefits in reducing South Warwickshire’s contributions to climate change through improving ecological resilience, improved air filtration and carbon sequestration properties, flood attenuation, as well as maintaining the quality and local distinctive character of South Warwickshire’s landscapes and townscapes. As such, secondary minor positive impacts have been identified for climate change, flood risk, landscape and pollution (SA Objectives 1, 2, 4 and 6).

E.10.4 Policy Direction 39: Environmental net gain

Draft Policy Direction 39: Environmental net gain

We will aim to have a policy that requires development to contribute positively to the natural environment by providing measurable net improvements in biodiversity and ecosystem services. The initial focus will be on BNG and carbon sequestration, but the policy will be updated to incorporate other ecosystem services as a comprehensive ENG framework is developed.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
39	++	+	++	0	0	+	+	0	0	+	0	0	+

- E.10.4.1 The 25 Year Environment Plan committed the government to exploring potential for delivering environmental net gain, stating that “*In future, we want to expand the net gain approaches used for biodiversity to include wider natural capital benefits, such as flood protection, recreation and improved water and air quality*”²⁰.
- E.10.4.2 Through ensuring development contributes positively to the natural environment through making improving biodiversity and ecosystem services, this will be anticipated to support the ecological network and habitat provision in the Plan area and result in a major positive impact on biodiversity (SA Objective 3).
- E.10.4.3 The principle of environmental net gain is to go beyond the requirements of BNG and ensure a wider range of benefits can be secured. The policy direction highlights that alongside biodiversity, carbon sequestration will be an initial focus. As a method of reducing the amount of atmospheric CO₂, this could potentially lead to a major positive impact on climate change (SA Objective 1). Minor positive impacts can also be expected for flood risk, pollution and soil/water resources (SA Objectives 2, 6 and 7) where enhanced ecosystem services will support greater levels of air filtration and natural means of flood alleviation, reducing flood risk and air/water pollutants in the Plan area. Enhanced GI alongside improved air quality will also be likely to result in a minor positive impact on human health (SA Objective 10).
- E.10.4.4 Through recognising and seeking to protect the Plan area’s natural capital, a minor positive impact on the green economy could be seen (SA Objective 13).
- E.10.4.5 It is recommended that the SWLP does include a policy which will ensure development makes a positive contribution to the natural environment through conserving and enhancing ecosystem services.

²⁰ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 11/11/24]

E.10.5 Policy Direction 40: Green and blue infrastructure

Draft Policy Direction 40: Green and blue infrastructure

New development will ensure that existing and new GBI is considered and integrated into the scheme design from the outset. The functionality, accessibility and quality of existing open space should be reviewed and increased wherever this is possible.

One mechanism to ensure that GBI is delivered in line with the above requirements as well as the Green Infrastructure Framework, is to produce a “Greening Factor” for an area.

A Greening Factor is a planning tool used to improve the provision of Green Infrastructure in an area. When applied to a development site, it provides a threshold for the total area of a site which is expected to be covered by an element of GBI.

It is proposed that the GBI policy in the SWLP provides a Greening Factor for development across the South Warwickshire region. The policy will provide direction in line with the below:

Different Greening Factors will be calculated for major residential development, minor residential development, and commercial development. This is to take account of the significant pressure major residential development places on existing GBI.

The delivery of a greening factor on a site must be based on a baseline assessment of existing GBI, demonstrating that high value assets have been retained and enhanced where appropriate. This must be supported by the submission of a long-term maintenance plan for major developments.

The following green interventions will count towards a development’s Greening Factor. These include where green features are present on a site and are retained.:

- Trees and hedges, including canopy cover
- Areas of open space, including Green Wedges
- Green roofs and walls
- Multi-functional SUDs
- Community designated Local Green Space
- The enhancement and/or creation of habitats
- Allotments and food growing spaces
- Carbon Sequestration

A Site’s BNG contribution will also count towards the overall Greening Factor of a site.

Ecological enhancements will be expected to be delivered in line with the findings of the following evidence based documents, and designations:

- the emerging LNRS,
- HRA,
- Warwickshire, Coventry & Solihull Local Biodiversity Action Plan²¹
- Warwick District Council’s Biodiversity Action Programme.
- Nature improvement areas (e.g Dunsmore Living Landscape)
- Warwickshire, Coventry and Solihull Green Infrastructure Strategy²²

The SWLP will expect the above green interventions to be delivered in a manner which further enhances the effectiveness of their deployment. Furthermore, there are considerations for each of the above which go beyond their role in contributing to a Greening Factor. To ensure the SWLP acknowledges this, separate sub-policies will be produced for each. The next section details the direction these policies will take.

²¹ Warwickshire, Coventry & Solihull Local Biodiversity Action Plan (LBAP) | Warwickshire Wildlife Trust

²² Warwickshire, Coventry and Solihull Sub-regional Green Infrastructure Strategy (2024). Available at: <https://www.southwarwickshire.org.uk/doc/213175/name/SUB%20REGIONAL%20GREEN%20INFRASTRUCTURE%20STRATEGY%202024%20final.pdf> [Date accessed: 12/12/24]

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
40	++	++	++	+	0	+	0	0	0	+	0	0	0

E.10.5.1 Policy Direction 40 sets out measures that will ensure the protection and enhancement of the GI and BI network within the SWLP area. Setting out a different Greening Factor per type of development will be expected to provide tangible targets for incorporating GBI into the design and layout of development which will support the extension of the ecological network and habitat provision across the Plan. This is further supported through reference to the LNRS and nature improvement areas which will encourage the creation of wildlife corridors and habitat creation, making effective change to the wider ecological network. Overall, it is anticipated that Policy Direction 40 will have a major positive impact on biodiversity (SA Objective 3).

E.10.5.2 This will also be anticipated to have subsequent major positive impacts on climate change and flood risk (SA Objectives 1 and 2) where the multifunction ecosystem service functions associated with GBI, such as carbon sequestration and means of flood alleviation such as SUDs as listed in the policy direction, will be anticipated to support a reduction in South Warwickshire’s contribution to human induced climate change and alleviate pressure on areas at risk of flooding, particularly in the built up parts of the Plan area.

E.10.5.3 Secondary minor positive impacts will also be expected for landscape (SA Objective 4) where ensuring the provision of GBI on different types of development site will also maintain and protect the distinctive local landscape and townscape character across South Warwickshire. GBI, including green rooves and green wedges will support ecosystem service functions such as air filtration. Improvements to air quality will also subsequently be anticipated to have a positive impact on the health of residents and reduce the risk of heart disease, respiratory related illness and cancers. Protecting and enhancing the green network will provide residents with green spaces and facilitate healthier lifestyles. Policy Direction 40 will therefore be expected to have minor positive impacts on pollution and health (SA Objectives 6 and 10).

E.10.5.4 It is recommended that the policy ensures that new development follows the principles and standards as set out in Natural England’s Green Infrastructure Framework²³ to ensure effective GBI can be delivered and maintained.

E.10.6 Policy Direction 41: Carbon sinks and sequestration

Draft Policy Direction 41: Carbon sinks and sequestration

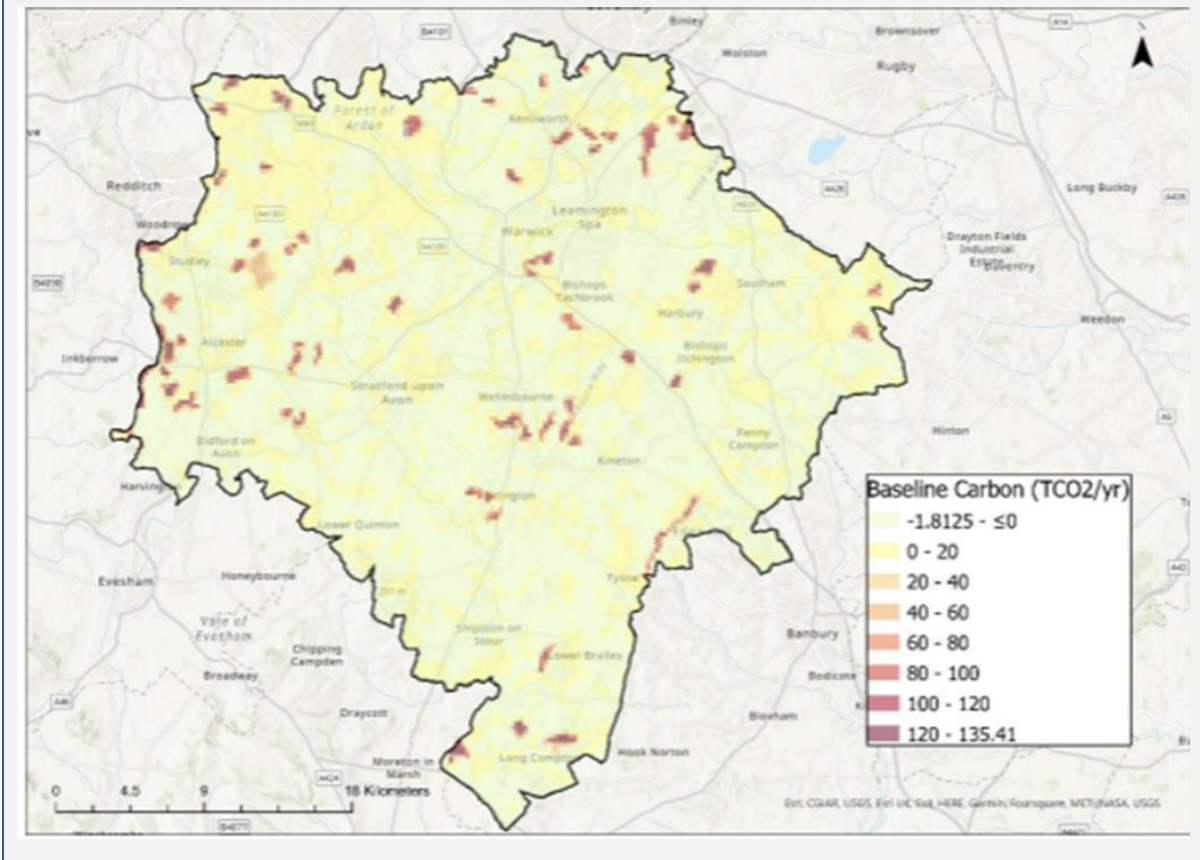
- Development will be expected to protect and enhance carbon sinks that are sequestering carbon above a certain threshold. This will be based on the data shown in the map below. The threshold has not yet been set due to the need for further evidence including further Green Infrastructure evidence.
- Where damage or loss is unavoidable then suitable mitigation must be sought through delivery of the Greening Factor as set out in the Green and Blue Infrastructure Policy.

²³ Natural England (2024) Green Infrastructure Framework. Available at: <https://designatedsites.naturalengland.org.uk/greeninfrastructure/home.aspx> [Date accessed: 11/11/24]

Draft Policy Direction 41: Carbon sinks and sequestration

- We will explore the possibility of policies which require a net gain in carbon sequestration.

Figure 18: South Warwickshire Carbon Sequestration Baseline



Policy Direction	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
41	++	0	+	0	0	+	0	0	0	0	0	0	0

E.10.6.1 Policy Direction 41 is anticipated to have a major positive impact on climate change (SA Objective 1) where supporting carbon sinks will allow for the most effective functioning of these assets for carbon sequestration. Secondary minor positive impacts on air pollution will also be expected (SA Objective 6).

E.10.6.2 The policy direction also states that where harm to carbon sinks is unavoidable as a result of development, mitigation must be sought through a Greening Factor which has the potential to also support biodiversity across the Plan area. Therefore, a minor positive impact has been identified for biodiversity (SA Objective 3).

E.10.6.3 As stated in the policy direction, a carbon sequestration net gain policy will further support the functioning of ecosystem services for carbon sequestration in the Plan area, potentially reducing South Warwickshire’s contributions to anthropogenic climate change. It is recommended that the SWLP does include a policy relating to carbon sequestration net gain, unless this can be delivered through a comprehensive environmental net gain policy (as suggested under Policy Direction 39).

E.10.7 Policy Direction 42: Trees, hedges and woodland

Draft Policy Direction 42: Trees, hedges and woodland

SDC and WDC will resist the loss of trees of value based on amenity, historic or ecological value apart from where the tree is dead, dying or dangerous; the tree is demonstrated as causing significant damage to adjacent structures or felling is for reasons of good Arboriculture practice.

- There will be a presumption in favour of the retention and enhancement of existing trees, woodland and hedgerow cover on-site. Trees that fulfil the below criteria must be retained on site, unless there is a sound arboricultural reason not to:
 - Tree Preservation Orders
 - Trees in a conservation area
 - Ancient Woodland
 - Ancient and Veteran trees
 - Protected hedgerows
 - Traditional Orchards
- Development will be expected to increase tree canopy cover, this will be supported by a tree canopy assessment in line with guidance that is to be developed.
- Tree planting will be in line with:
 - UK Tree Strategy
 - The UK Forestry Standard 5th edition
 - England Tree Action Plan
 - Local Tree Strategies and other local strategies
 - A Guide to planning new woodland in England

Policy Direction	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
42	+	+	++	+	0	+	0	0	0	+	0	0	0

E.10.7.1 Policy Direction 42 seeks to support the provision of trees, hedgerows and woodland across the Plan area, therefore protecting and enhancing habitat and ecological provision. Trees, hedges and woodland support a vast array of important flora and fauna and can serve as useful connecting habitats to facilitate the movement of species. A major positive impact on biodiversity is therefore identified (SA Objective 3).

E.10.7.2 Protecting trees, hedgerows and woodland in South Warwickshire from harm as a result of development, such as with ancient woodland, trees in a conservation area and traditional orchards, among others, will maintain the character of the Plan area particularly where woodland forms a significant and distinctive part of the landscape. As such, a minor positive impact has been identified on the landscape (SA Objectives 4).

E.10.7.3 The multifunctional ecosystem service functions associated with tree, hedgerow and woodland cover across the Plan area will be anticipated to support air filtration and carbon sequestration. As a result this is expected to reduce contributions to climate change and improve air quality in the Plan area, which will support improvements to resident’s health through limiting risks of heart disease, respiratory related illness and cancers. Therefore, minor positive impacts have been identified in relation to climate change, pollution and health (SA Objectives 1, 6 and 10).

E.10.7.4 Supporting an increased provision of canopy cover with development will be expected to also have a minor positive impact on flood risk (SA Objective 2) where this will help support increased rates of infiltration and slow surface water run-off rates which will be anticipated to reduce the risk of flooding, particularly in built up areas.

E.10.8 Policy Direction 43a: Local green space

Draft Policy Direction 43a: Local green space

- LGS currently within adopted Neighbourhood Plans will be rolled over into the SWLP plans.
- New Local Green Space designations will be supported and these will be updated and shown on policies maps.
 - Existing Local Green Space proposals, including RURAL.4 of the Stratford-upon-Avon Site Allocations Plan will continue to be progressed, informed by consideration of any reasonable alternatives.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
43a	0	0	+	+	0	0	0	0	0	+	0	0	0

E.10.8.1 Policy Direction 43a is anticipated to have a minor positive impact on landscape (SA Objective 4), where the provision of open green spaces will protect and maintain the distinctive character of the local landscape through maintaining attractive open green spaces.

E.10.8.2 Continuing to progress existing local green space proposals and supporting new proposals for new local green space will also be anticipated to have a minor positive impact on biodiversity (SA Objective 3) where this is anticipated to increase GI in the Plan area. Access to these open green spaces will also be expected to have a minor positive impact on health (SA Objective 10) where access to green space is known to have benefits for mental and physical wellbeing and as such increasing the provision of open green spaces will increase resident access to green spaces.

E.10.8.3 When the wording for this policy direction becomes finalised, it is recommended that it makes specific reference to the recognition of the multifunctional benefits of GI and open space where they can provide wider benefits for health, recreation, integration into the wider landscape and for biodiversity.

E.10.9 Policy Direction 43b: Registered Parks and Gardens

Draft Policy Direction 43b: Registered Parks and Gardens

- The policy will protect and where possible enhance registered parks and gardens.
- Support efforts to reinstate landscape or built features which contribute positively to the historic interest of the park or garden.
- where extensions are proposed to properties backing on to registered communal grounds, they must preserve the significance of views into, from and across the garden, including any impacts from pollution, as listed in the above Pollution Policy.

Policy Direction	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
43b	0	0	0	+	+	0	0	0	0	0	0	0	0

E.10.9.1 Supporting and enhancing the provision of Registered Parks and Gardens (RPGs) is anticipated to have a minor positive impact on the historic environment in South Warwickshire. Through ensuring properties backing on to RPGs “*preserve the significance of views into, from and across the garden*”, Policy Direction 43b will be expected to have a positive impact on the distinctive local landscape character as well as protecting and enhancing the significance of heritage features in the Plan area. Minor positive impacts have been identified for landscape and cultural heritage (SA Objectives 4 and 5).

E.10.9.2 It is recommended that this policy makes reference to the potential for any enhancements or extensions to RPGs to contribute to local biodiversity, considering the multifunctional nature of green space in and around South Warwickshire.

E.10.10 Policy Direction 43c: Open spaces

Draft Policy Direction 43c: Open spaces

- Development involving the loss of open space will not be permitted unless significant public benefits outweigh the loss.
- The Councils will seek to enhance and improve open space and to provide new areas of open space where there is a deficiency in quantity, quality or accessibility.
- New development will be required to ensure adequate provision of open spaces in line with future guidance.
- It is expected that open spaces will be provided in the first instance onsite and only when it can be demonstrated that this is not achievable physically to deliver, then an off-site contribution will be sought to enhance or provide new open space, within 400m of the development. Technical evidence will be obtained to determine thresholds for open space provision.
- We will seek opportunities to improve access and accessibility to open spaces for all users.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
43c	0	0	+	+	0	0	0	0	0	+	0	0	0

E.10.10.1 Policy Direction 43c seeks to ensure open space across South Warwickshire is enhanced and improved where there is a poor provision and quality of open space. Incorporating open spaces on site, or 400m from the development where on site delivery is not feasible, will ensure residents and workers have access to outdoor space which will support their mental and physical wellbeing. Improving accessibility to open spaces will also have a positive impact in reducing health inequalities, where this has the potential to ensure those who are disadvantaged in this regard have access to open spaces. As such a minor positive impact has been identified for health (SA Objective 10).

E.10.10.2 Through increasing the provision of open space across the Plan area this will be expected to have a minor positive impact with regard to biodiversity and landscape (SA Objectives 3 and 4) as the provision of open space is anticipated to increase the extent of GI across the Plan area, contributing to a more joined up ecological network and maintaining the distinctive local landscape character throughout developments.

E.10.10.3 It is recommended that this policy direction makes specific reference to the recognition of the multifunctional benefits of GI and open space where they can provide wider benefits for health, recreation, integration into the wider landscape and for biodiversity.

E.10.11 Policy Direction 43d: Urban Parks and Play Areas

Draft Policy Direction 43d: Urban Parks and Play Areas

- Developments will be required to ensure adequate play provision is provided in line with future guidance.
- It is expected that play spaces will be provided in the first instance onsite or in the immediate vicinity and only when it can be demonstrated that this is not achievable physically to deliver, then an off-site contribution will be sought.
- Develop better and more local and inclusive play spaces for all users
- Create a more child friendly public realm by encouraging the provision of play spaces in wider urban settings.
- MUGAs will be requested as part of Major development sites and the aspiration is that every resident will have a MUGA available to them within 15 minute's walk. This will help foster community cohesion and help with active lifestyles. Should there be insufficient space to provide a MUGA onsite or other demonstrable reason why this cannot be provided, then an off-site sum will be requested to enable the creation or enhancement of existing facilities. Design guidance for MUGA's will be outlined in future guidance.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
43d	0	0	0	0	0	0	0	0	0	+	0	0	0

E.10.11.1 Policy Direction 43d is anticipated to result in a minor positive impact on health (SA Objective 10). The provision urban parks and play areas including multi-use game areas (MUGAs) associated with new development will be expected to support the mental and physical health of residents across South Warwickshire, particularly amongst children and young people through facilitating greater socialisation and interaction and encouraging active lifestyles.

E.10.11.2 It is recommended that this policy direction makes specific reference to the recognition of the multifunctional benefits of GI and open space where they can provide wider benefits for health, recreation, integration into the wider landscape and for biodiversity, including where urban parks can help to improve people’s connection with nature.

E.10.12 Policy Direction 43e: Allotments, Orchards and Community Gardens.

Draft Policy Direction 43e: Allotments, Orchards and Community Gardens													
	<ul style="list-style-type: none"> • Developments should seek to provide space for food growing. Technical Evidence will be obtained to inform and provide guidance. • Food production spaces should be provided onsite in the first instance and only where it is robustly demonstrated that it is not feasible or practical to provide this onsite will an off-site commuted sum to enhance or provide new facilities be considered. • Consideration should be given in orchards to the species selected which should be a mix of local species and also climate resilient species in line with future guidance. A management and maintenance plan will also be needed. • To ensure that these developments contribute towards biodiversity at the design stage as well as at the use stage i.e. ponds, natural hedging and the inclusion where possible of bee hives 												

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
43e	+	0	+	+	0	0	0	0	0	+	0	0	0

E.10.12.1 Ensuring developments provide space for food cultivation and community gardens will increase community cohesion and social interaction among residents. This will be expected to help combat loneliness and isolation among more vulnerable groups in society such as the elderly. Growing food and maintaining orchards will also encourage residents to spend time outdoors, with gardening and small scale food production having positive benefits for mental and physical wellbeing. As such, a minor positive impact on health is identified (SA Objective 10).

E.10.12.2 Incorporating careful biodiverse design, such as the inclusion of ponds or beehives, will be expected to boost local biodiversity. This will likely have a positive impact on food production through the attraction of invertebrates and pollinators, and will also create key pockets of habitat which can contribute to the wider ecological network and nature recovery. As such, a minor positive impact has been identified for biodiversity. It is recommended that this policy includes specific reference to the wider LNRS or ecological network where this would provide new and alternative areas for habitat provision, particularly in the built up areas of South Warwickshire.

E.10.12.3 An indirect minor positive impact is also anticipated for climate change where allotments, orchards and community gardens will provide wider ecosystem service benefits, such as carbon sequestration, contributing to the mitigation of climate change in South Warwickshire. A minor positive impact is also anticipated for landscape (SA Objective 4) where community gardens, allotments and orchards are expected to contribute to maintaining the local landscape and townscape appearance and character.

E.10.13 Policy Direction 44: Outdoor sports and leisure

Draft Policy Direction 44: Outdoor sports and leisure

- The redevelopment of existing community, sport and leisure uses and land formerly used as such to other uses will only be supported where it can be demonstrated that: there is no need or demand for such uses on the site and adequate alternative provision is available to meet the needs of the area; equivalent or better replacement facilities are secured on or off site that are equally accessible to the community or the development is for an alternative sport or leisure facility or use the benefits of which clearly outweigh the loss of the current or former use.
- Where strategic residential development is proposed the provision of new facilities will be sought. The needs for sports and leisure will be assessed on a case-by-case basis depending on the type of development, the location of the site in relation to existing facilities and the capacity of existing facilities. Evidence of this will be available within the Playing Pitch Strategy.
- Proposals for the extension or redevelopment of existing community, sport or leisure facilities to expand and/or diversify the existing use will be supported.
- Outdoor sports and leisure provision will be easily accessible for all users.

Policy Direction	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
44	0	0	0	0	0	0	0	0	0	+	0	0	0

E.10.13.1 Under Policy Direction 44, seeking to provide new outdoor sports and leisure facilities with strategic residential development will be expected to have a positive impact on health (SA Objective 10) where this can encourage active lifestyles among residents. Having immediate access to facilities will be anticipated to result in behavioural changes where residents will be more inclined to use facilities which are easily accessible to them. Under the Playing Pitch Strategy, this will also be expected to provide access to a range of sporting facilities which would be expected to cater to a wide range of residents.

E.10.14 Policy Direction 45: Areas of restraint

Draft Policy Direction 45: Areas of restraint

- Areas of Restraint will be utilised across the two districts, with Stratford designations being reviewed, and new designations being identified within Warwick where appropriate.
- Areas of Restraint will seek to protect areas that make an important contribution to the character of the settlement.
- The policy will seek to ensure that development does not harm the open nature of these identified areas, unless the scheme has demonstrable community benefits and contributes significantly the Local Plan’s core objectives.
- Projects which enhance the character and visual amenity of Areas of Restraint will be encouraged, as will the promotion of beneficial uses such as public access, nature conservation and food production.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
45	0	0	+	+	0	0	0	0	0	+	0	0	0

E.10.14.1 Policy Direction 45 promotes the use of ‘areas of restraint’ which as set out in the introduction text will “*protect sensitive areas within a settlement that make an important contribution to the character of that settlement*”. Utilising areas of restraint will be anticipated to have a minor positive impact on landscape (SA Objective). Protecting the open nature of identified areas of restraint will support the distinctive landscape and townscape character of settlements across South Warwickshire.

E.10.14.2 As stated in Policy Direction 45, this will also be anticipated to have secondary minor positive impacts on biodiversity (SA Objective 3) where enhancing the character and visual amenity of areas of restraint will also be expected to support nature conservation and contribute to the wider ecological provision of the area, as well as human health (SA Objective 10) associated with improved access to the countryside which may include increased opportunities for outdoor exercise and recreation.

E.10.15 Policy Direction 46: Protecting the Cotswold National Landscape

Draft Policy Direction 46: Protecting the Cotswold National Landscape

- The Cotswold AONB/National Landscape Policy will remain largely the same, however a buffer zone will be introduced to help ensure that we are pro-actively responding to the duty to ‘seek to further’ the purpose of conserving and enhancing the natural beauty of the area.
- The Buffer Zone will assist development management officers, and those wishing to develop within the setting of the National Landscape.
- The buffer zone will not be an extension to the National Landscape Designation.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
46	0	0	0	+	+	0	0	0	0	0	0	0	0

E.10.15.1 Policy Direction 46 refers to the existing policy ‘Cotswolds Area of Outstanding Natural Beauty’ (AONB) in the Stratford-on-Avon District Core Strategy²⁴ which seeks to ensure any development affecting the AONB, now known as National Landscape, will conserve and enhance its distinct qualities and not harm the built character, as well as minimising any noise, air or light pollution.

E.10.15.2 Creating a buffer zone around the Cotswolds National Landscape will be expected to conserve and enhance the natural beauty of the landscape whilst also offering guidance to any development which may occur within the setting or have an effect on the surrounding landscape. As such, a minor positive impact has been identified for landscape (SA Objective 4) where it will support the maintenance of the setting and surroundings of the Cotswolds National Landscape.

E.10.15.3 This policy direction could be strengthened through specific reference to the setting and design of development to ensure it is in-keeping and appropriate to the distinctive character and time-depth of the Cotswolds National Landscape. This could result in the identification of positive impacts related to cultural heritage (SA Objective 5).

E.10.16 Policy Direction 47: Special Landscape Areas

Draft Policy Direction 47: Special Landscape Areas

South Warwickshire contains some very special landscape areas, and in order to ensure these are suitably protected and their character maintained Special Landscape Areas will be designated across both Stratford on Avon and Warwick.

The SLA designation will not restrict development, but instead ensure that development in these areas does not have a harmful impact on the areas’ distinctive character and appearance.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
47	0	0	0	+	0	0	0	0	0	0	0	0	0

²⁴ Stratford-on-Avon District Council (2016) Core Strategy (2011- 2031). Available at: <https://www.stratford.gov.uk/templates/server/document-relay.cfm?doc=173518&name=SDC%20CORE%20STRATEGY%202011%202031%20July%202016.pdf> [Date accessed: 13/11/24]

- E.10.16.1 Special Landscape Areas (SLAs) are non-statutory designations recognising areas of the local landscape with important characteristics. In the SWLP area there are four SLAs including Arden, Cotswold Fringe, Feldon Parkland, Ironstone Hills Fringe. The SLAs aid in ensuring development is in-keeping with the surrounding environment and maintains the distinctive landscape character.
- E.10.16.2 Direction 47 seeks to protect the character of the distinctive Special Landscape Areas in South Warwickshire and their unique characteristics. Through ensuring development does not result in harmful impacts on the character and appearance of these SLAs, a minor positive impact on landscape is expected (SA Objective 4).
- E.10.16.3 It is recommended that this policy includes specific wording, or cross-references to the provisions of other policies, to ensure any development is sensitively designed with regard to each SLA and incorporates design features which will ensure any development is in-keeping with its distinctive surroundings. This would have the potential to support further positive impacts in relation to cultural heritage (SA Objective 5).

E.10.17 Policy Direction 48: Protecting and enhancing landscape character

Draft Policy Direction 48: Protecting and enhancing landscape character

Development will avoid detrimental effects on the landscape setting and on features which make a significant contribution to the character and setting of an asset, settlement or area. Where a proposal would result in landscape harm, the general principle is that it should be refused unless there would be an over-riding benefit of the development for instance to meet an evidenced local housing need. Developments will require high quality landscaping schemes that positively contribute towards enhancing the character and amenity of the landscape and seek to incorporate measures to minimise and mitigate the effect of development upon the landscape, while also seeking to minimise the cumulative effect of development to prevent coalescence. These schemes will consider the landscape context, local distinctiveness and historic character and landscape, including tranquillity.

- Developments will take into account the local topography and built form, as well as key local views and vistas and seek to avoid creating hard developed edges to the open countryside.
- We will explore the need for major developments applications to require a full Landscape Visual Impact Assessment.
- We will explore the possibility of requiring long-term management and maintenance (minimum of five years) of new landscape proposals to ensure their establishment. Evidence will be gathered to inform this approach.

	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy Direction	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
48	0	0	0	+	+	0	0	0	0	0	0	0	0

E.10.17.1 Policy Direction 48 is anticipated to have a minor positive impact on landscape (SA Objective 4) where it seeks to ensure development will be required to avoid adverse impacts on the setting and significant features of the landscape. The incorporation of high quality landscaping schemes will be expected to ensure development in the SWLP area is in-keeping with the “*landscape context, local distinctiveness and historic character and landscape, including tranquility*”. This also has the potential to lead to a minor positive impact on cultural heritage (SA Objective 5) where the high quality landscaping schemes will consider the historic character of the area to ensure this is not impeded by development.

E.10.17.2 It is recommended that the policy direction makes reference to specific wording regarding the use of previously developed land for development and regeneration of existing built-up areas which would be less likely to have an impact on South Warwickshire’s distinctive landscape and result in a reduced need for greenfield and previously undeveloped land. Within these, “*high quality landscaping schemes that positively contribute towards enhancing the character and amenity of the landscape*” should be incorporated into these developments.

E.10.18 Policy Direction 49: Agricultural land

Draft Policy Direction 49: Agricultural land

- Development outside the identified growth strategy sites/ settlements will be required to protect best and most versatile agricultural land.
- Any development that is put forward in the best and most versatile agricultural land will need to demonstrate that the benefits of the development outweigh the harm.
- The large-scale renewable energy developments will be prioritised on the poor-quality agricultural land (Grades 3b, 4 and 5).

Policy Direction	1	2	3	4	5	6	7	8	9	10	11	12	13
	Climate Change	Flood Risk	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Accessibility	Education	Economy
49	0	0	0	0	0	0	++	0	0	0	0	0	0

E.10.18.1 Policy Direction 49 is expected to have a major positive impact on natural resources (SA Objective 7) where developments will be required to “*protect best and most versatile agricultural land*”. Ensuring any large-scale renewable energy development is prioritised on poor-quality agricultural land, this policy direction will be expected to protect and preserve the BMV land within South Warwickshire which has the potential to support more efficient and fruitful food production.

E.10.18.2 This policy direction could be strengthened through reference to improving the quality and health of soils in the Plan area, which could provide further benefits for the natural resources, as well as benefits for biodiversity through supporting soil communities, including invertebrates and fungi.



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