



Warwick District Local Plan 2011-2029: Canalside DPD

Sustainability Appraisal (SA) Report

October 2019

enfusion



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Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA)

October 2019

date:	September 2019 v01 Draft October 2019 v02 Final	
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Non-Technical Summary (NTS) (available separately)

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1.0 INTRODUCTION

Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA)

- 1.1 Strategic Environmental Assessment (SEA)^{1 2} is a systematic process used during the preparation of plans and policies and it aims to provide a high level of protection for the environment. Sustainability Appraisal (SA) is a process that similarly investigates plans and policies, including consideration of socio-economic factors in the same way as environmental factors. SA incorporating SEA is a mandatory requirement for Local Plans in accordance with planning legislation³ and paragraph 32 of the National Planning Policy Framework (revised 2018)⁴. Government advises⁵ that an integrated approach should be taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
- 1.2 Local Plan Documents must also be subject to Habitats Regulations Assessment (HRA)⁶. The Habitats Regulations (amended 2018)⁷ afford a high level of protection to sites in a network of internationally important sites designated for their ecological status. These sites comprise European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar⁸ sites. It is a requirement to consider if the plan is likely to have significant effects on any relevant designated site. HRA is a two staged process – screening and appropriate assessment (if significant adverse effects are screened as likely).
- 1.3 National Planning Practice Guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. These key stages and tasks are applicable to the SA process for the Warwick Canalside DPD. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses. The role of the SA is to inform the plan-making process.
- 1.4 This SA Report explains the Stage A Scoping that was completed earlier and sent to the statutory consultation bodies in accordance with good practice. It reports the findings of Stage B Alternatives & Assessment and comprises Stage C Preparation of the SA Report. This SA Report accompanies the Warwick

¹ EU Directive 2001/42/EC

² Environmental Assessment of Plans and Programmes Regulations, 2004
<http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

³ Section 19(5) of the 2004 Planning & Compulsory Purchase Act and Regulation 22(a) of the Town & Country Planning (Local Planning) (England) Regulations 2012

⁴ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁵ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

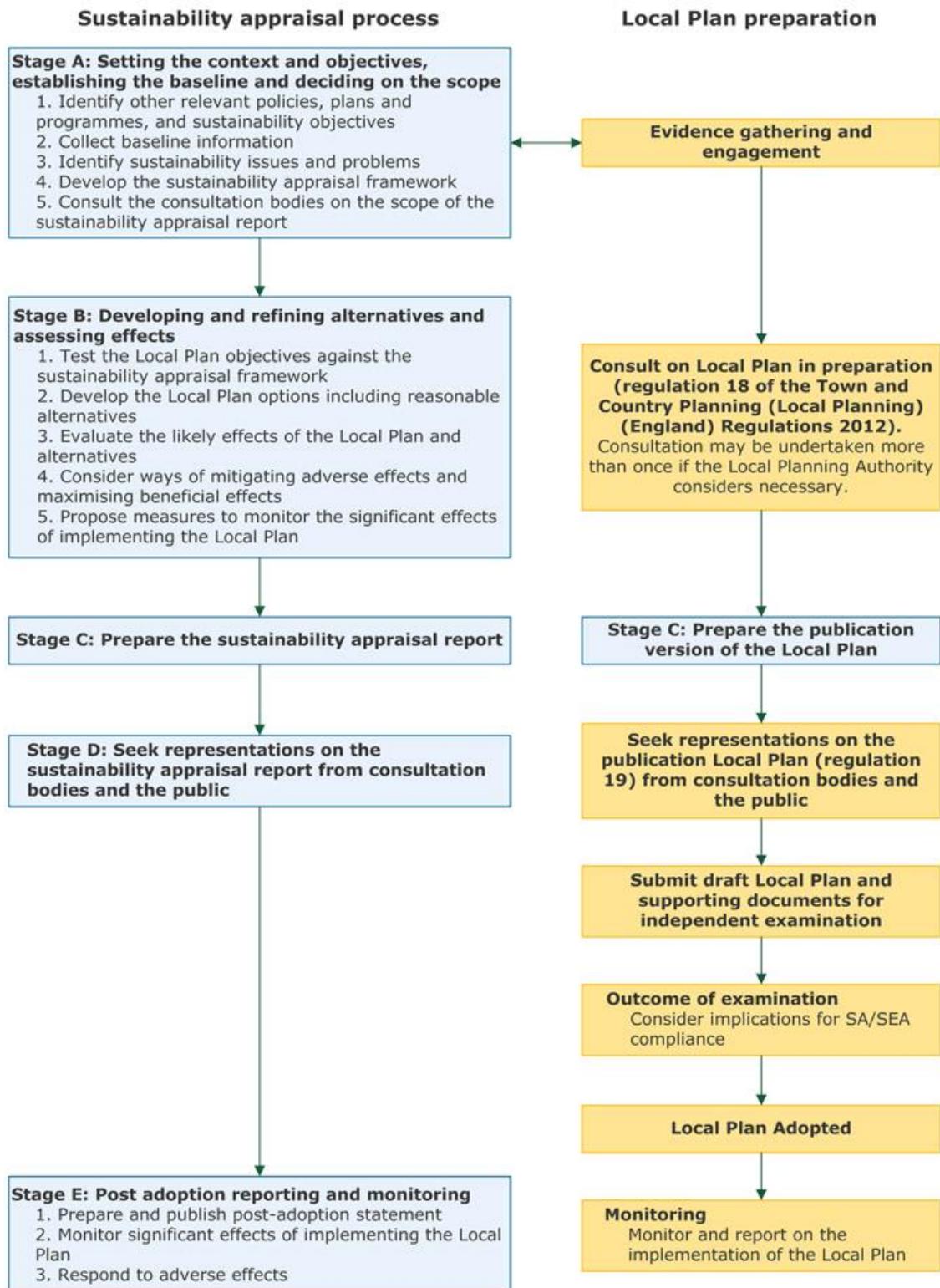
⁶ <https://www.gov.uk/guidance/appropriate-assessment>

⁷ <http://www.legislation.gov.uk/uksi/2018/1307/contents/made>

⁸ Support internationally important wetland habitats and are listed under the Ramsar Convention on Wetlands of International Importance

Canalside DPD on public consultation for Stage D and seeks comments from the public and the statutory consultees.

Figure 1.1: SA and Plan-making Stages and Tasks



The Warwick Local Plan 2011-2029

- 1.5 The overarching development plan document (DPD) for the Warwick District area is the Local Plan that was adopted in September 2017⁹. The Local Plan set out a commitment¹⁰ to draft two DPDs for the District: Gypsy & Traveller DPD and Canal DPD. The Canal DPD will identify a new Conservation Area(s), consider how the canalside can be improved in relation to opportunity sites for new/redevelopment in the urban sections and consider issues around the canal environment throughout the district. Issues around improving access to the canals and encouraging new users will also be examined. The Council has also published a Supplementary Planning Document (January 2019)¹¹ to update the situation with regard to air quality and reflect the increasing concern about air quality and climate change. The Local Plan DPDs, SPD and Neighbourhood Plans comprise the hierarchy of planning documents that, together with the NPPF, guide applications and decisions for new development in the Warwick District area.

The Warwick Canalside Development Planning Document (DPD)

- 1.6 The Canalside DPD has been prepared in accordance with the policy requirement in the Local Plan (2011-2029). Policy DS17 states:

“The Council will prepare and adopt a Canalside Development Plan Document (DPD) to:

- a) assess the canals in the District and their environment and setting;*
- b) identify areas for regeneration along urban sections, particularly for employment, housing, tourism and cultural uses; and*
- c) identify areas for protection, where these are appropriate, throughout the canal network within the District.*

This document will designate particular areas and uses and will set out policies for use in assessing planning applications.”

- 1.7 The canalside has been given special consideration as it is considered that this area has long been neglected in terms of development and public use and that there are opportunities in this area that could be exploited for both the local and wider community. The draft Canalside DPD comprises the following:

- Objectives of the DPD
- Policy Background
- The New Conservation Area
- Context of canals in Warwick District - Grand Union Canal, The Stratford upon Avon and Birmingham and Fazeley Canals
- Issues - rubbish dumping, crime & perception of crime, vandalism, aesthetics, HS2, vacant & underused buildings, access, flooding
- Potential Options
- Opportunity Sites

⁹ https://www.warwickdc.gov.uk/info/20410/local_plan

¹⁰ https://www.warwickdc.gov.uk/info/20799/development_plan_documents

¹¹ https://www.warwickdc.gov.uk/downloads/file/5043/air_quality_spd

- Policies: CS1 Design; CS2 Parking; CS3 Archaeology; CS4 Biodiversity; CS5 Renewable Energy; CS6 PBSA; CS7 Signage; site-specific - CS9 Sydenham Industrial Estate; CS10 Industrial Estate Millers Road/Cape Road; CS11 former school at Montague Road
- Who will be involved?
- Appendix I Other Opportunity Sites Analysed
- Appendix II Listed Buildings close to the Canals
- Appendix III Constraints (Local Nature reserves; Local Wildlife Sites; HP gas pipelines; HV overhead power lines; minerals; Conservation Areas; historic landfill & contaminated land; HS2 safeguarding)

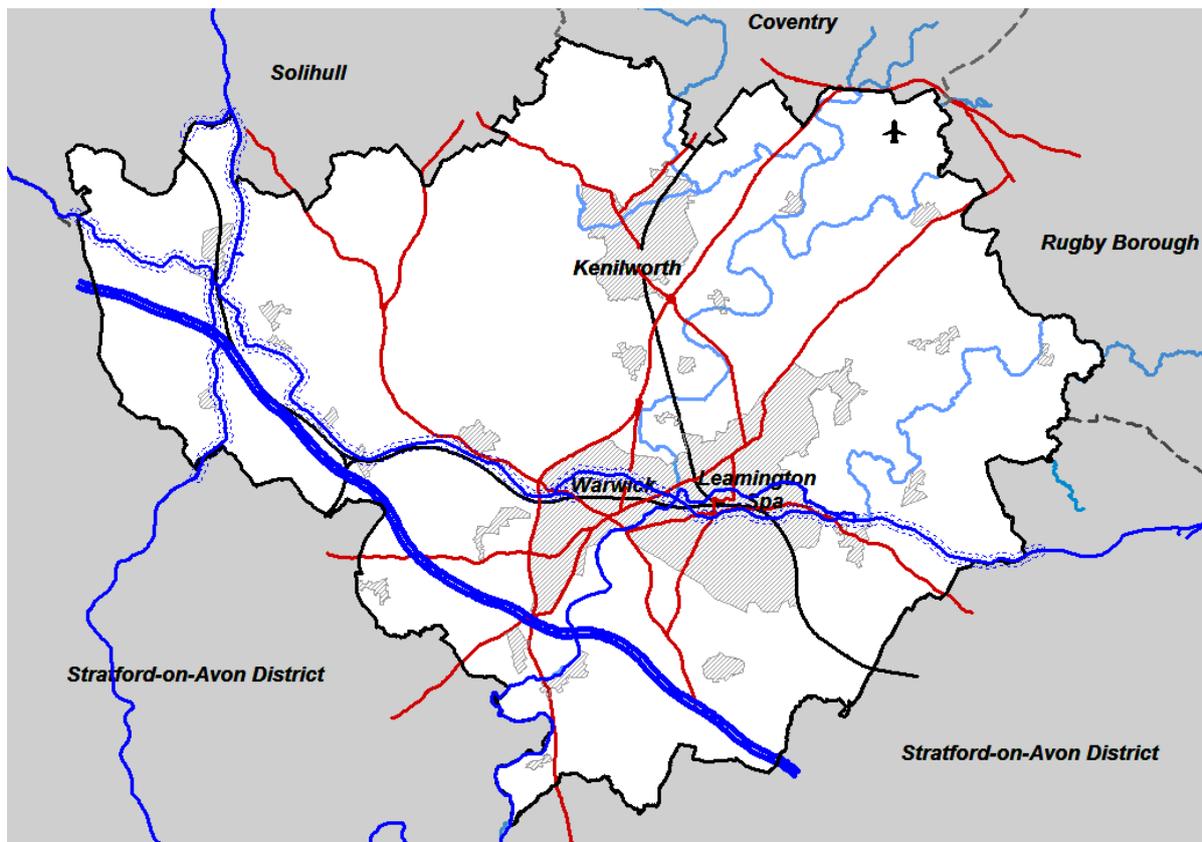
1.8 The Objectives of the Canalside DPD are as follows:

- Identify issues and opportunities and address/exploit them
- Look at a wide range of potential schemes to encourage more use of the canals and be imaginative and creative
- Increase the use of the canals and their environs to open them up to a new range of activities
- Create new frontages to face the canals instead of backing onto them, especially with new residential development
- Change perceptions of hidden backwaters as dangerous and crime ridden
- Make the canals safe and attractive and accessible to everyone
- Improve the visual aspects of the canals and widen their appeal to include all sectors of the community
- Protect any aspect of the canal that needs to be preserved whether tangible or conceptual
- Protect wildlife, habitats and water quality
- Increase awareness by use of directional and information boards in appropriate location

1.9 The DPD covers the whole length of all sections of canal that run through the district. It considers the canals themselves and the land to either side, the state of the towpaths and any facilities that are provided and the land beyond where there is vacant or under-utilised land and/or buildings or other opportunities for regeneration. It also considers the existing communities, both on the canals and alongside. The extent of the waterways, canals and the canalsides in the Warwick District area is shown in the map¹² following:

¹² From the emerging draft Warwick District Canalside DPD

Figure 1.2: Location of Canals in Warwick District



Consultation

- 1.10 The statutory consultation bodies were consulted upon the SA/SEA & HRA scoping and screening report (September 2019). The Warwick District Council is publishing the draft Canalside DPD together with this SA Report for statutory and wider public consultation. Any comments on the draft DPD and SA will be taken into account.

Compliance with the Requirements of the EU SEA Directive

- 1.11 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process and specify that, if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. This SA Report presents the SA/SEA testing of the emerging Development Plan Document and includes a Non-Technical Summary and an appendix that clearly signposts the requirements for reporting the SEA.

This SA Report

- 1.10 The Warwick Local Plan was subject to SA/SEA (Submission Report 2015 & Addendum 2017)¹³ and HRA (Screening Report 2014) during its preparation and examination, including formal and public consultation. The Canalside DPD must be in conformity with the adopted Local Plan and it is important that the SA/SEA is also in conformity with the previous assessments. However, the NPPF was revised in 2018, including significant implications for biodiversity net gain. This SA seeks to incorporate the updated requirements, including the information set out in planning practice guidance.
- 1.11 A Court of Justice of the European Union (CJEU) Judgment (2017)¹⁴ has had implications for the established methods in the UK for undertaking HRA (and through which the Local Plan had been assessed). The implication of this judgment is that competent authorities cannot take account of any integrated or additional avoidance or reduction measures when considering at the Habitats Regulations Assessment (HRA) screening stage whether a plan is likely to have an adverse effect on a European Site. Therefore, this report seeks to update the assessment process and make explicit that the initial stage of HRA screening has been applied without consideration of embedded mitigation such as through Local Plan policies.
- 1.12 This report has been prepared in accordance with regulatory requirements, government guidance and in consideration of good practice. A proportionate approach has been taken since the Local Plan was adopted in 2017 and the DPD focuses on the canals with their canalsides through the District. The HRA considerations have been addressed within this SA Report. Warwick District Council has commissioned independent SA/SEA & HRA specialists Enfusion Ltd to undertake the work on behalf of the Council.
- 1.13 Section 2 of this SA Report describes the approach taken and methods used with the baseline characterisation presented in Section 3. The approach to options in plan-making and reasonable alternatives in SA/SEA is explained in Section 4. The findings of the SA and HRA assessments are presented in Section 5. An outline of the approach for monitoring is set out in Section 6 and conclusions with next steps outlined in Section 7.

¹³ https://www.warwickdc.gov.uk/info/20410/local_plan/1197/local_plan_evidence_base

¹⁴ People over Wind & Sweetman v Coillte Teoranta Case C-323/17

2.0 SUSTAINABILITY APPRAISAL METHODS

Approach, Guidance & Methods

- 2.1 SA incorporating SEA is a mandatory requirement for Local Plan documents in accordance with paragraph 32 of the National Planning Policy Framework (revised 2018)¹⁵. Guidance on undertaking SA/SEA of plans is provided through UK government planning practice¹⁶; guidance¹⁷ on HRA for plans is also available. The SA and HRA have been undertaken in accordance with this government guidance and drawing upon professional experience.
- 2.2 The SA has built upon the previous SA work undertaken during the development of the Local Plan, refining it to be focused on the Canalside DPD with relevant sustainability topics and issues. The opportunity was taken to update the assessments in line with the revised NPPF (2018) and the updated requirements for HRA.
- 2.3 Available information from Defra Magic maps, Environment Agency flood risk maps, the Council's evidence base for the local planning documents, and the evidence base for the draft Canalside DPD, together with professional judgment, was used to identify the sensitivity of the DPD area and to undertake the assessments.

Screening & Scoping

- 2.4 The scoping for SA/SEA considered whether the policies and proposals in the emerging DPD are likely to have significant sustainability effects, as follows:
 - how they might affect the environment, communities or economy
 - whether any of the proposals are likely to affect a “sensitive area”, such as a Site of Special Scientific Interest (SSSI) or an internationally designated Site for nature conservation (SAC, SPA, Ramsar)
 - whether implementation of policies in the plan might lead to new development in the future

The DPD includes new policies, including 3 site-specific policies for land adjacent to the canal; the canalside areas include nationally important natural and historic environmental assets and their settings.

- 2.5 The scoping/screening for HRA considered whether the draft DPD could have any likely significant effects (LSEs) on internationally designated sites – Special Protection Areas (SACs), Special Areas of Protection (SPAs) and Ramsar – alone or in-combination with other plans or projects. There is only one isolated internationally designated site – Ensor's Pool SAC – within the Warwick District

¹⁵ <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

¹⁶ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

¹⁷ <https://www.gov.uk/guidance/appropriate-assessment>

area. There are no other designated sites within a 20 km radius and therefore, unlikely to be significant effects. However, since the DPD is focused on canals that are linked to other water systems, such as the River Severn, there could be the potential for environmental pathways and implications for functionally linked land and water connected with the Severn Estuary SPA/SAC/Ramsar.

- 2.6 Therefore, the HRA screening stage has been developed further and the appropriate assessment stage applied with regard to potential changes to water quality & water levels. The HRA process comprises two stages: an initial screening stage considers whether a plan or project is likely to have a significant effect on a European site either alone or in combination with other plans or projects. If likely significant effects (LSEs) are identified through the screening stage, then the plan or project should be tested through a second stage – the appropriate assessment (AA). The Warwick Local Plan and the DPD do include relevant policy mitigation and the approach essentially reinforces this through the updated methodology - thus making the process and conclusions explicit with regard to the updated requirements. This precautionary approach is being taken in particular consideration of the significant changes to HRA methods in the UK since the screening undertaken for the Local Plan.

The SA Framework

- 2.7 The SA Framework provides the basis by which the sustainability effects of the DPD are described, evaluated and options compared. It includes objectives, elaborated by decision making criteria, that are relevant to the objectives of the Local Plan and the DPD, the role and duties of the Warwick District Council, and sustainable development in the Warwick and canalside areas. These objectives were identified through the SA scoping stage for the Local Plan from the information collated in the plans & programmes review, baseline analysis, identification of sustainability issues, and subject to consultation. This SA Framework is the same as that used to assess the emerging Local Plan in order to clearly demonstrate conformity with the higher level of development planning and assessment, as follows:

Table 2.1: SA Framework

Objective	Key Questions
1. To have a strong and stable economy <i>SEA Directive topics: population & health</i>	Will it help meet the employment needs of the local community? Will it help diversify the economy in general? Will it enhance the vitality and viability of the town centre? Will it encourage or enable inward investment? Will it promote investment in future prosperity (for example by supporting R&D, small businesses and/or encouraging skills development)?
2. To enable a range of sustainable transport options	Will it encourage the use of public transport, walking or cycling? Will it help reduce traffic congestion?

<p><i>SEA Directive topics: air, climatic factors, health</i></p>	
<p>3. To reduce the need to travel</p> <p><i>SEA Directive topics: air, climatic factors, health</i></p>	<p>Will it reduce the overall need to travel? Will it help reduce the need to travel by car / lorry?</p>
<p>4. To reduce the generation of waste and increase recycling</p> <p><i>SEA Directive topics: soil, health, biodiversity</i></p>	<p>Will it encourage the management of waste in line with the waste management hierarchy, giving first priority to reducing waste, followed by reuse and recycling, then other forms of energy recovery and lastly disposal? Will any residual disposal be undertaken in the least environmentally detrimental manner?</p>
<p>5. To ensure the prudent use of land and natural resources</p> <p><i>SEA Directive topics: biodiversity, flora, fauna and soil</i></p>	<p>Does it optimise the use of previously developed land and buildings? Will it minimise development on Greenfield land? Will it reduce the amount of derelict, degraded or underused land? Does it make efficient use of existing physical infrastructure (i.e. instead of requiring new infrastructure to be built)? Does it encourage resource-efficient design and/or construction (in terms of water and/or raw materials)? Does it encourage the use of materials from alternative and renewable sources?</p>
<p>6. To protect and enhance the natural environment</p> <p><i>SEA Directive topics: biodiversity, flora, fauna and landscape</i></p>	<p>Will it protect and enhance species, habitats and sites designated for their nature conservation interest? Will it safeguard and/or enhance the character of significant landscape areas?</p>
<p>7. To create and maintain safe, well-designed, high quality built environments</p> <p><i>SEA Directive topics: landscape, cultural heritage</i></p>	<p>Will it help provide a sense of identity and local distinctiveness? Will it protect or enhance the setting of the town? Will it promote design that enhances townscapes? Will it protect or improve safety in built environments?</p>
<p>8. To protect and enhance the historic environment</p> <p><i>SEA Directive topics: cultural heritage</i></p>	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value? Will it encourage appropriate use of and/or access to buildings and landscapes of historical/cultural value?</p>
<p>9. To create good quality air, water and soils</p>	<p>Will it affect local air quality? Will it affect air quality in the Air Quality Management Areas? Will it minimise pollution of soils? Will it minimise light and noise pollution levels?</p>

<p><i>SEA Directive topics: soil, water, air</i></p>	<p>Will it retain the best quality agricultural land? Will it minimise adverse effects on ground and surface water quality? Will it prevent deterioration of water quality as measured by the Water Framework Directive?</p>
<p>10. To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources.</p> <p><i>SEA Directive topics: air, climatic factors</i></p>	<p>Will it reduce overall energy use through increased energy efficiency? Will it reduce or minimise greenhouse gas emissions? Will it increase the proportion of energy generated from renewable and low carbon sources?</p>
<p>11. To adapt to the predicted impacts of climate change including flood risk</p> <p><i>SEA Directive topics: water, climatic factors</i></p>	<p>Will it reduce or minimise the risk of flooding? Will it minimise sensitive development in medium and high risk flood zones?</p>
<p>12. To meet the housing needs of the whole community (ensuring the provision of decent and affordable housing for all, of the right quantity, type, size and tenure)</p> <p><i>SEA Directive topics: population, health</i></p>	<p>Is it enabling the housing target to be met? Does it provide for the development of balanced communities by encouraging an appropriate mix of housing (in terms of type, size and tenure)? Will it reduce homelessness and housing need? Will it reduce the number of empty homes?</p>
<p>13. To protect, enhance and improve accessibility to local services and community facilities</p> <p><i>SEA Directive topics: population, health</i></p>	<p>Will it maintain and enhance existing community facilities? Will it put unacceptable pressure on existing services and community facilities? Will it improve access to local services and facilities for the whole community?</p>
<p>14. To improve health and well being</p> <p><i>SEA Directive topics: health</i></p>	<p>Will it promote healthy lifestyles? Will it provide and improve access to health and social care services? Will it provide and/or enhance the provision of open space? Will it improve opportunities to participate in the district's cultural, sport and recreational opportunities?</p>
<p>15. To reduce poverty and social exclusion</p> <p><i>SEA Directive topics: population, health</i></p>	<p>Will it reduce poverty and social exclusion in those areas most affected?</p>

16. To reduce crime, fear of crime and antisocial behaviour <i>SEA Directive topics: population, health</i>	Will it reduce actual levels of crime? Will it reduce the fear of crime? Will it reduce / discourage anti-social behaviour?
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Table 2.2: Significance Key

Categories of Significance		
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
=	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical & improbable because known sustainability issues; mitigation likely to be difficult and/or expensive
+	-	SA Objectives 2, 5, 6, 13 and 14 consider more than one topic & as a result there is the potential for different effects. For example, Objective 2 relates to encouraging the use of public transport, walking & cycling as well as reducing traffic congestion. Development could have a negative effect on traffic; however, it could also provide new cycle/walking routes with a positive effect – and thus, two symbols.

Appraising the Warwick Canalside DPD

- 2.8 The number and extent of reasonable alternatives to be considered through plan-making and the SA are limited. However, the development of the draft DPD has considered vacant or under-utilised land and/or opportunities for regeneration. Section 6 in the draft DPD carefully explains the approach and that the adopted Local Plan identifies some potential areas for additional residential development alongside the canal in urban areas. Appendix 1 lists the potential sites A-Z that were investigated. The 3 areas identified within the Local Plan are proposed to be taken forward in the DPD and these three sites were assessed as the reasonable alternatives identified.
- 2.8 The 3 DPD site-specific Policies CS9-CS11 will be assessed using the full SA framework and details provided in an appendix in order to show compatibility and correlation with the SA of the Local Plan. The assessment of the other DPD Policies and the DPD as a whole will be presented as a narrative to allow the SA to focus on the aspects of the DPD that are likely to have significant effects, thus providing further detail whilst minimising the number of detailed technical matrices. It allows for the consideration of mitigation measures that may be provided through policies in the adopted Local Plan and embedded within the DPD. This is appropriate and proportional for the level of plan-

making and assessment. The SA objectives were grouped into sustainability topics, as follows:

- Economy: SA No 1 Economy
- Housing, Communities, Health & Wellbeing: SA No 12 Housing; SA No 13 Access to Services/Facilities; SA No 15 Reduce Poverty; SA No 16 Reduce Crime
- Transport: SA No 2 sustainable Transport; SA No 3 Reduce Need to Travel
- Air Quality & Climate Change: SA No 9 Good Quality Air; SA No 10 Minimise Causes of Climate Change
- Land/Soil Resources: SA No 4 Reduce Waste; SA No 5 Land/Soil & Sustainable Construction; SA No 9 Good Quality Soils
- Natural Environment: SA No 6 Biodiversity; SA No 6 Landscape; SA No 7 High Quality Design
- Historic Environment: SA No 8 Historic Environment
- Water: SA No 11 Adapt to Impacts of climate change – flooding; SA No 9 Good Quality Water

- 2.9 The assessment includes consideration of the likely effects on sustainable development, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects in accordance with Schedule 2 12(3) of the SEA Regulations. Any possibilities for mitigating any potential significant negative effects, or enhancing potential positive effects, were suggested to the plan-makers, as relevant.

Consultation

- 2.10 The SA/SEA & HRA scoping and screening report (September 2019) was sent to the statutory environmental bodies for 5 weeks consultation in early September. No comments were received from the Environment Agency at this stage. Historic England advised that they support the approach to the SA process and how it will link in to the SA work previously undertaken in respect of the Local Plan. They made some suggestions for clarification on two of the decision-aiding questions in the SA Framework – relating to settings of heritage assets and archaeology. Also, to consider replacing *protect* with *conserve* in line with updated NPPF terminology.
- 2.11 Natural England advised that they agree with the conclusions provided in the HRA and welcomed the precautionary approach described regarding appropriate assessment, in particular with respect to water levels and water quality. NE indicated that they would like to share the emerging evidence base in relation to the Severn Estuary SPA. NE is aware that SPA birds can travel across and up to the Vale of the Cotswold Scarp and as far north as Longdon Marsh on the Worcestershire/Gloucestershire border and such land is likely to form functionally linked land. NE generally supported the sustainability objectives in the SA framework.

3.0 SUSTAINABILITY CONTEXT & BASELINE CHARACTERISATION

Other Plans and Projects

3.1 The SA/SEA and Habitats Regulations include a requirement to consider the implications of other relevant plans and projects. This was undertaken during the SA of the Warwick District Local Plan. The key plans and projects relevant to the Canalside DPD are as follows:

- Stratford-on-Avon District Local Plan
- Solihull District
- Coventry District
- Rugby Borough
- Warwick District Neighbourhood Plans¹⁸
- Warwick District Green Infrastructure Study (2012)
- Warwickshire, Coventry & Solihull Green Infrastructure Strategy (2014)¹⁹
- Severn River Basin Management Plan (2016)²⁰
- Severn Trent Water Resource Management Plan 2019²¹
- Water Resources Strategy 2015-2020 Canal & River Trust²²
- The Green Plan Canal & River Trust²³
- Fisheries & Angling Action Plans²⁴
- High Speed 2 HS²⁵

Baseline Conditions

3.2 The baseline characterisation of the Warwick District area was undertaken as part of the SA scoping stage in 2014 and updated as the SA progressed in line with the development of the Local Plan through to adoption in 2017. The key relevant information has been updated further here and the characterisation of the District area with its canals, the canalside land and their communities may be summarised as follows:

3.3 **Biodiversity & the Natural Environment:** There are no internationally designated sites²⁶ (SACs, SPAs or Ramsar) within a 15 km radius of the Warwick District area; one SAC (Ensor's Pool, Nuneaton) is within a 20 km radius. Areas

¹⁸ https://www.warwickdc.gov.uk/info/20444/neighbourhood_plans

¹⁹ <https://www.warwickshire.gov.uk/greeninfrastructure>

²⁰ <https://www.gov.uk/government/publications/severn-river-basin-district-river-basin-management-plan>

²¹ <https://www.severntrent.com/about-us/future-plans/water-resource-management/water-resource-management-plan/>

²² <https://canalrivertrust.org.uk/specialist-teams/managing-our-water/water-resources-strategy>

²³ <https://canalrivertrust.org.uk/specialist-teams/caring-for-our-environment/the-green-plan>

²⁴ <https://canalrivertrust.org.uk/enjoy-the-waterways/fishing/angling-strategies>

²⁵ <https://www.hs2.org.uk/where/>

²⁶ <https://magic.defra.gov.uk/MagicMap.aspx>

of environmental national importance in the District as a whole include 7 Sites of Special Scientific Interest (SSSIs) and 15 Sites of Importance for Nature Conservation (SINCs). There is no nationally designated landscape (AONB) but the landscapes in the District are valued for their scenic qualities, rich wildlife and cultural associations, and are fundamental to the intrinsic character and local distinctiveness of the area. Much of the rural areas through which the canals run is designated as Green Belt and their openness is protected.

- 3.4 The Leam Valley Local Nature Reserve (LNR) is located north of the Grand Union Canal and to the east of Leamington Spa. The Newbold Combyn Park LNR is to the south of the Grand Union Canal to the east of Leamington Spa and north of Radford Semele. There are various Local Wildlife Sites (LWSs)²⁷ associated with the two canals and their canalsides including sites at Budbrooke, Hatton, Hockley Heath, Lapworth, Offchurch, Radford Semele, Royal Leamington Spa, and Shrewley. There are rich networks of green infrastructure throughout the District and including the water and canal networks.
- 3.5 **The Historic Environment:** The District has a rich historic and cultural heritage and includes 2,145 Listed Buildings; 30 Conservation Areas; and 11 Registered Parks and Gardens. One of the major outcomes of the assessment of the canals in developing the Canalside DPD was the designation of a new Canal Conservation Area²⁸ in recognition of the special qualities and character of and interest in the canals and their immediate environs. The canal runs through the Conservation Area at Lowsonford and through the Conservation Area at Leamington Spa; the canal runs adjacent to the Conservation Area at Rowington.
- 3.4 **Air Quality & Transport:** There are good road and rail links with surrounding major urban areas with railway stations at Warwick, Leamington Spa, Kenilworth, Hatton and Lapworth. However, air quality and traffic congestion, particularly in the main towns, are key issues. Warwick District Council has designated five air quality management areas (AQMAs)²⁹ due to elevated annual average concentrations of nitrogen dioxide (NO₂). The AQMAs include Warwick Town Centre, Coventry Road (Warwick), Leamington Spa and two AQMAs in Kenilworth. The Council's recent Air Quality SPD (January 2019) guides new development with regard to transport, air quality, energy and green infrastructure.
- 3.5 **Water Quality, Levels & Resources:** There is a network of rivers and watercourses running through the District, including the two canals and the Warwickshire River Avon. The river runs north to south through the district and then feeds into the Severn Estuary towards the south-west. The Grand Union Canal runs east-west through the southern part of the district including through the urban areas of Warwick and Leamington Spa. It links to the Birmingham & Fazeley Canal south east of Kingswood. The Stratford upon

²⁷ <https://data.gov.uk/dataset/669d39c1-df92-4974-aa39-fa815acaba44/warwickshire-local-wildlife-sites-lws>

²⁸ https://www.warwickdc.gov.uk/info/20004/planning/1264/canal_conservation_area

²⁹ https://www.warwickdc.gov.uk/downloads/file/5043/air_quality_spd

Avon Canal enters the district south of Lowsonford and runs northwards to become the Birmingham & Fazeley Canal. It then runs westwards and leaves the district near Hockley Heath in the north-west; there are feeder lakes at Earlswood at the edge of the district area.

- 3.6 The networks of watercourses and water bodies are interconnected. Water is abstracted from the canal system for both agriculture and commercial uses. There are issues around the level of topping up and abstraction, since there are more applications for licences to abstract water made year on year for both agricultural and commercial use. The water levels need to be maintained for navigation and to support the multifunctionality of the water including biodiversity/green infrastructure, recreation/leisure & wellbeing, together with its contribution to climate change resilience and role in sustainable water management.
- 3.7 The local water quality of the canals and River Avon is not precisely known but nationally (Environment Agency, 2018), nitrates are a major issue³⁰ – mostly water run-off from agricultural land or deposited on land and water from traffic emissions. About 20% of abstractions were considered to be unsustainable in 2017, reducing water levels and damaging wildlife. High winter river flows have increased over the past 30 years, with a subsequent increase in the frequency and magnitude of flooding. There is no clear trend in droughts, but summer river flows and groundwater levels may decrease in the future.
- 3.8 Water is supplied to the Warwick district by Severn Trent Water Ltd within the Strategic Grid Water Resource Zone (WRZ) that extends from the Peak District to Gloucester and covers most of Worcestershire³¹. The Strategic Grid is made up of 14 major water treatment works (WTWs), five reservoir complexes, three major grid booster pumping stations and a number of strategic pipeline network connections and aqueducts – representing a complex interaction of abstraction, treatment and transfer, and particularly focused on the River Trent catchment system. The WRMP includes the ongoing commitment to restore sustainable abstraction. There appears to be no significant major water proposals that would affect the water systems in the Warwick District area. Severn Trent Water also plans and manages the wastewater treatment and sewerage systems in the Warwick district area.
- 3.9 **Soils/Land Use:** The rural parts of the district comprise mostly agricultural land quality Grades 3a & 3b but there are significant areas of the best and most versatile agricultural land at Grade 2 adjacent to the south-west of Whitnash and north of Leamington Spa³². The canals run through the important cultural/historic urban areas of Warwick and Leamington Spa; the rest of the routes are through rural areas. The canals were built for transportation but fell out of use with the coming of the railways and then the road network. Some canalside areas had previous industrial uses and may have contaminated land, for example, various factory sites through Leamington Spa; other

³⁰ <https://www.gov.uk/government/publications/state-of-the-environment>

³¹ <https://www.severntrent.com/about-us/future-plans/water-resource-management/wrmp-19-documents/>

³² <https://magic.defra.gov.uk/MagicMap.aspx>

canalside areas have been used as historic landfills or for sewage treatment works. Some parts of the canals have become a quiet place for wildlife, angling and water-based leisure; others have become overgrown, abandoned and used as rubbish tips.

- 3.10 **Communities, Housing & Employment:** Approximately 90% of the District's population live in the four main urban areas (Royal Leamington Spa, Warwick, Kenilworth and Whitnash) with the remaining 10% living in a number of relatively small villages. These main centres contain a wide range of different types of housing but there are some affordability issues. The population has grown from 124,000 in 2000 to around 140,000 in 2017³³. Compared to other parts of Warwickshire, a higher proportion of the District's population is of working age. The highest rate of projected population growth in the future is expected to be amongst those aged 65 and over – in line with the rest of the UK.
- 3.11 It is thought that there are only permanent residential moorings at the Saltisford Canal Arm in Warwick with 7 moorings. The canals are widely used for boating holidays and leisure use with the Warwickshire Ring a popular route for the enthusiast. There are major marinas in other parts of Warwickshire but limited boatyards and specialist facilities within the Warwick district area.
- 3.12 Neighbourhood Plans (NPs) are the local level of plans that sit within the Local Plan and the DPDs; they reflect local community interests. The Budbrooke NP is adopted and the area is located adjacent south of the Grand Union. Other NPs are in preparation, including at Leamington, Radford Semele and Lapworth.
- 3.14 The District has a strong local economy, with a skilled population and higher than average levels of productivity and earnings compared with regional and national averages. However, the changing needs of business means that some of the District's traditional industrial areas require regeneration, with many of these areas located alongside the Grand Union Canal in Warwick and Royal Leamington Spa. The District's 40km of canal offer particular opportunities for recreation, regeneration and environmental improvement.

Key Sustainability Issues & Opportunities

- 3.15 The key issues and opportunities for sustainable development and the Canalside DPD may be summarised as follows:
- Degraded environment with dumping of litter/rubbish, vandalism with crime and the perception of crime, and poor visual and aesthetic quality – strong opportunities to regenerate and improve the local environments, including safety and improved access
 - Vacant and underused buildings – opportunity to facilitate regeneration and reuse; maintain and repair significant buildings and historic assets

³³ www.ons.gov/

- Accessibility – canals provide important linear routes for walking and cycling for healthier living as well as routes for water-based transport; accessibility could be improved including for a wider cultural diversity
- Flooding and water resources – canals may be subject to flooding; the canals also provide water supplies to industry and agriculture, but levels need to be maintained to support navigation and wildlife. The canals also have a wider role in sustainable water management and climate change resilience.
- Green infrastructure – making linkages to networks and improvements with biodiversity gains for wildlife and people
- Increased boating use³⁴
- Pressures for overdevelopment at some sites
- High Speed 2³⁵

³⁴ <https://canalrivertrust.org.uk/specialist-teams/managing-our-water/water-resources-strategy>

³⁵ <https://www.hs2.org.uk/> (now delayed for 5 years)

4.0 PLAN-MAKING OPTIONS & ALTERNATIVES IN SA/SEA

Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan and the reasons for selecting alternatives should be outlined in the report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance advises that it is taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan.
- 4.2 It is acknowledged that there is a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. The SA does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the plan. Case law in England has clarified and provided further guidance for SA/SEA practice of development plans. The SA Report must include an outline of the reasons for selecting or rejecting options; it is the plan-making authority that is the primary decision-maker in relation to identifying what is to be regarded as a reasonable alternative.

Assessment of Options in Plan-Making

- 4.3 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by the local planning authorities through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis – and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.4 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At the later and lower levels of development planning for site allocations, options assessment tends to be more specific - often focused on criteria and thresholds, such as land availability, accessibility to services, and impacts on local landscape.

Options Considered for the Canalside DPD

- 4.5 The Local Plan in Policy DS17 identified 3 potential areas for additional residential development alongside the canal in areas of Leamington Spa and Warwick. These areas are industrial estates for small scale local manufacturing and are characterised by buildings that no longer reflect the

needs of many businesses and less than easy access to the road network.
The 3 areas are:

- Sydenham Industrial Estate
- Cape Road/Millers Road
- Montague Road

4.6 The Council's Employment Land Review (2013) concluded that future redevelopment for alternative uses may be appropriate with a managed release of employment land at these 3 locations. Therefore, rationalisation and regeneration at these 3 locations was progressed into the draft Canalside DPD as the evidence indicated suitability and deliverability of such site options. Accordingly, these 3 sites were subject to SA using the full SA framework and to demonstrate compatibility with the previous SA undertaken during the development of the Local Plan and its Site Allocations.

4.7 A number of other potential sites were identified and investigated for reuse (residential and/or employment) should they be available, suitable or become available. Information on the sites is listed in Appendix I of the draft DPD with a summary of current use/planning history and includes an outline of the analysis together with an indication of whether there might be potential in the future. The other potential sites investigated may be summarised, as follows:

Table 4.1: Other Potential Sites Investigated

Ref No	Site Location	Description Key issues or Opportunities	Potential Site if becomes Available?
A	North of Warwick Parkway Station	Station car park & located within the Green Belt	No
B	WCC site adjacent to A46	Used as offices, highways storage etc	Only if WCC vacate & sell
C	Units off Budbrooke Road	Industrial units in comparative good order & appear viable – for sale	Yes?
D	Spring Cottage Birmingham Road & opposite	Previous scrapyards & derelict cottages with outline planning permission for up to 5 dwellings	None beyond that proposed
E	Saltisford Common Bridge	Saltisford Trust run businesses & events from Canal Arm land – viable community & recreational resource	No
F	North end of Saltisford Common	Allotments	No
G	Unit off Harris Rd (Wedgnock Industrial Estate)	Industrial unit with offices in good condition	No
H	Wedgnock Park Bridge	Small area of land with no road access	No

I	Land rear of units on Ladbrooke Park (Millers Rd)	Industrial units occupied and meeting a variety of employment needs	No
J	Coventry Road Bridge	Part of larger site allocated for residential in Local Plan - allocated H11 Montague Rd for 140 dwellings	No
K	Unit of Nelson Lane with landing stages to rear	Ideal for moorings associated with existing boating & other small businesses.	No
L	Warehouse, Nelson Lane	Industrial unit fully occupied & protected by Local Plan EC3	No
M	Adjacent Charles Street Bridge & Wharf Street	Industrial unit fully occupied & protected by Local Plan Policy EC3	No
N	East of All saints Bridge, Emscote road	Small site currently used as car rental/sales; access would be an issue	Unlikely
O	Lidl, Myton Road	Small retail unit	Possibly?
P	NW of Europa Way roundabout	Small area of open land/scrub; too small, access & noise problems	No
Q	Shrublands Recreation Ground north of Queensway	WDC recreation ground, protected by LP Policy HS2	No
R	Land between canal & Bury Road	Open land adjacent to canal & towpath – best for green infrastructure not development	No
S	Rangemaster, Ranelagh Street	Industrial unit in use	Possibly in longer term?
T	Althorpe Industrial Estate	Part of Creative Quarter & mixed-use development; subject of current planning application	Possibly?
U	1-13 Neilston Street	Small industrial, warehouse units for sale; appear well- used	No
V	Berrington Road Sydenham	Small industrial units; part of land already redeveloped for housing	No
W	Playground, Rushmore Street	Playground & important local space, protected by LP Policy HS2	No
X	Units between St Mary's Rd & Clapham St	Industrial units in mixed-use area – occupied & appear popular	Possible under DS8 but unlikely in short term
Y	North of St Mary's Rd, west of Ramsey Rd	Continuation of Sydenham Industrial Estate	Possible under DS8 but unlikely in short term

Z	Land at end of Gulliman's Way	Open land in flood zone 3 & 3a	No
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- 4.8 Thus the other potential sites investigated were found mostly to be not suitable for new development or were not available; a few sites were indicated as possibly suitable if they were to become available in the longer term. Therefore, these sites were not considered to be reasonable alternatives for the purposes of SA/SEA, and they were not investigated any further through the assessment process.

The Do-Nothing Scenario

- 4.9 Doing nothing is not a reasonable alternative for the Council as the local planning authority is required to provide sufficient development land to meet the needs of the local communities for housing and employment. The adopted Local Plan with Policy DS17 makes the commitment to preparation of a Canalside DPD and the importance of the canals and their immediate environs has been recognised with the development of the Canal Conservation Area.

5.0 SUSTAINABILITY APPRAISAL OF THE WARWICK CANALSIDE DPD

SA of DPD Objectives

5.1 The Canalside DPD includes a list of objectives as follows:

- Identify issues and opportunities and address/exploit them
- Look at a wide range of potential schemes to encourage more use of the canals and be imaginative and creative
- Increase the use of the canals and their environs to open them up to a new range of activities
- Create new frontages to face the canals instead of backing onto them, especially with new residential development
- Change perceptions of hidden backwaters as dangerous and crime ridden
- Make the canals safe and attractive and accessible to everyone
- Improve the visual aspects of the canals and widen their appeal to include all sectors of the community
- Protect any aspect of the canal that needs to be preserved whether tangible or conceptual
- Protect wildlife, habitats and water quality
- Increase awareness by use of directional and information boards in appropriate locations

5.2 A compatibility analysis was undertaken of the DPD's objectives against the SA objectives in the SA Framework using professional judgment and a simple compatibility approach - + compatible; - not compatible; ? uncertain; and O not applicable. The findings are shown in the table following:

Table 5.1: Compatibility Analysis – DPD & SA Objectives

DPD Objectives	Issues & Opportunities	Range of schemes	Increase Use	Create new Frontages	Change Perceptions	Safe & accessible	Improve visual	Protect any aspect	Protect wildlife & WQ	Increase Awareness
1.Economy	+	+	+	+	+	+	+	+	+	+
2.Sustainable Transport	+	+	+	O	+	+	+	+	?	+
3.Reduce Travel	+	+	+	O	+	+	+	+	?	+
4.Reduce Waste	+	+	?	O	+	+	+	+	+	+
5.Use of Land	+	+	+	O	+	+	+	+	+	+
6.Natural Environment	+	+	?	O	?	O	+	+	+	?
7.High Quality	+	+	+	+	+	+	+	+	+	+
8.Historic Environment	+	+	?	O	+	O	+	+	O	+

9. Air, Water, Soil Quality	+	+	?	○	+	○	+	+	+	+
10. Climate Change	+	+	+	○	+	+	+	+	?	+
11. Flood Risk	+	+	+	○	○	+	○	+	+	+
12. Housing	+	+	+	+	+	+	+	+	+	+
13. Services & Facilities	+	+	+	○	+	+	○	+	?	+
14. Health & Wellbeing	+	+	+	+	+	+	+	+	+	+
15. Reduce Poverty	+	+	+	○	+	+	+	+	+	+
16. Reduce Crime	+	+	+	+	+	+	+	+	+	+

5.3 Most SA Objectives were found to be compatible with the DPD objectives; there were no incompatibilities identified. A few uncertainties were recorded, for example, the historic and natural environments and increased use. However, other policies in the Local Plan will ensure that both objectives are progressed and protected. The SA only made one suggestion – to amend the objective on protecting wildlife and water quality to “improving” and thus be more in line with the recent changes to biodiversity net gain in planning³⁶.

SA of Site-Specific Policies CS9-CS11

5.4 The detailed SA of the 3 sites proposed for residential development is presented in Appendix II of this SA Report.

Table 5.2: Site Specific Policies – SA Summary

DPD Site Specific Policies	CS9 Sydenham Industrial Estate		CS10 Industrial Estate Millers Road/ape Road		CS11 Former school at Montague Road	
SA Objectives						
1. Economy	=		=		=	
2. Sustainable Transport	+	+?	+	+?	+	+?
3. Reduce Travel	+		+		+	
4. Reduce Waste	=		=		=	
5. Use of Land	++		++		++	
6. Biodiversity; Landscape	+	+	++	+	++	++
7. High Quality	+		+		+	
8. Historic Environment	+		=		+	
9. Air, Water, Soil Quality	=		=		=	
10. Climate Change	+		+		+	
11. Flood Risk	=		=		=	
12. Housing	+		+		+	
13. Services & Facilities	=		=		=	

³⁶ <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

14. Health & Wellbeing	+	+	+
15.Reduce Poverty	+	+	+
16. Reduce Crime	+	+	+?

- 5.5 The SA found mostly neutral or positive effects; there were no negative effects identified. The review of industrial estates undertaken to inform the Local Plan found that these estates no longer reflect the requirements of many businesses as explained in Local Plan Policy DS8 Employment Land. Employment land to meet needs is allocated in Policy DS9 and guided through Policy EC1 Directing New Employment Development. Criteria in DPD Policies CS9 & 10 further explain the current situation with regard to the current use of industrial units and requirements for redevelopment. Therefore, no loss of employment land and neutral effects for SA No 1 Economy.
- 5.6 The 3 site areas are well located within the urban areas of Leamington/Sydenham (CS9) and Warwick (CS10-11) for sustainable transport with good access to bus stops and railway stations – minor positive effects for SA No 3 Travel; some uncertainty as to the extent that this might help reduce congestion elsewhere. DPD CS2 provides some mitigation measures that could help reduce congestion by requiring new development to meet with district parking standards. Also, good access to local services and community facilities nearby indicating neutral effects for SA No 13. All new development can reduce waste & increase recycling in accordance with other LP Policies – neutral effects.
- 5.7 Reuse of previously developed land has major positive effects for prudent use of land and resources, reducing loss of greenfield or agricultural land – for all three areas; remediation of any contamination associated with CS11 will have further positive effects for the soil resource and helping to resolve an existing sustainability problem.
- 5.8 Local Plan Policy NE3 Biodiversity requires new development to lead to no net loss and where possible a net gain; DPD Policy CS4 requires protection and enhancement of the canal green corridor – minor positive effects for biodiversity and SA No 6. DPD Policies CS10 & CS11 include specific requirements for green space indicating further positive effects for biodiversity and the green infrastructure networks that could be synergistic and cumulative in the longer term, extending beyond the canals themselves.
- 5.9 Proposals must comply with LP Policy BE1 Layout & Design and DPD Policy CS1 that requires new development to be of an appropriate scale, height, form and massing, utilising appropriate materials and details; and reflect, respect and reinforce local architectural and historical distinctiveness, particularly where sites fall within the Canal Conservation Area. The redevelopment and enhancements will result in positive effects for landscape/townscape for SA Nos 6 & 7 protecting/enhancing local character and promoting high quality-built environments.
- 5.10 Such an approach to design and redevelopment will also promote positive effects for SA Nos 7 and 16 – to improve safety; reduce crime, fear of crime

and antisocial behaviour. DPD Policies CS9 & CS11 specifically refer to requirements for design/layout that provides surveillance of the canal, increasing safe access – all with positive effects that could be synergistic and extend beyond the immediate area thus helping to resolve an existing sustainability issue.

- 5.11 The historic environment is protected through LP Policies HE1-4 and DPD Policy CS1 requires new development to respect and reinforce the local historical distinctiveness indicating at least neutral effects but likely positive effects through regeneration, enhancement of the built environment. There are no Listed Buildings of Scheduled Monuments near to the sites, with the exception of the Grade II listed Bridge House adjacent to the Coventry Road Bridge at edge of CS11 – redevelopment here may improve the existing setting. The potential for archaeological resources is recognised at the CS9 site and there are site-specific requirements to investigate. Overall, no significant sensitive assets and mitigation measures in place, indicating neutral effects for SA No 8 Historic Environment.
- 5.12 LP Policy NE5 Protection of Natural Resources requires that new development should not give rise to air, or water pollution, indicating neutral effects for SA No 9. It is noted that there may be some particular issues associated with air quality for CS11 and the DPD draws attention to the need for proposals to address this – any proposal will need to be in compliance with the Air Quality SPD (January 2019) and indicating that mitigation measures are in place. DPD CS2 requires that parking standards should be met, and this may reduce congestion and associated air quality emissions.
- 5.13 New development must comply with LP Policies CC1-2 on climate change adaptation including sustainable construction, multifunctional green infrastructure, and water efficiency (also Policy FW3) - with minor positive effects that will be cumulative in the longer term. DPD Policy CS5 requires that canals should be recognised as a potential renewable energy resource. All development must also comply with LP Policy FW1 Reducing Flood Risk indicating at least neutral effects; reinforced by DPD Policy CS1 that requires there should be no increase in the risk of flooding.
- 5.14 Provision of housing will have positive effects for SA No 12, contributing to meeting the identified needs. Policies CS9 & CS10 require specific proportions for low cost or affordable homes – and this will contribute to positive effects for SA No 15 aiming to reduce poverty and social exclusion.
- 5.15 DPD Policy CS1 requires new or improved safe access to the canal; this is reinforced by DPD Policies CS9-11 that specifically require maintenance, enhancement of open access to the canal with new public access in suitable locations – all contributing to enhanced access to the community asset of the canal with positive effects for SA No 13 on accessibility. These effects may be synergistic and extend beyond the immediate environs of the sites.
- 5.16 Provision of good quality housing will contribute to health and wellbeing; enhanced access to the canal for walking, cycling and other leisure or

reflective activities will all encourage a healthier lifestyle and contribute to positive effects for health & wellbeing and SA No 14 for improving health. The canals are nationally waymarked long distance paths and the enhancements to these sites will contribute to an improved environment for other users.

SA of Policies CS1-CS8

Economy:

SA Objective No 1: Economy

SEA Directive Topics: Population; Health

- 5.17 The adopted Local Plan recognises the changing requirements for business and commercial/industrial estates as explained in Local Plan Policy DS8 Employment Land with the commitment to investigate the potential for these three sites set out in LP Policy DS17. Thus, the LP and the DPD have set in place guidance to enable effectiveness use of land resources with overall neutral effects indicated through protection of employment land elsewhere.

Housing, Communities, Health & Wellbeing:

SA Objective No 12 Housing; SA No 13 Access to Services/Facilities; SA 14 Improve Health & Well-being; SA No 15 Reduce Poverty; SA No 16 Reduce Crime

SEA Directive Topics: Population; Health

- 5.18 Provision of high-quality housing will contribute to health and well-being with positive effects. The DPD notes that some purpose built student accommodation (PBSA) is already being constructed and that this can help to reuse the more neglected canalside sites. DPD Policy CS6 seeks to ensure that PBSA is located in suitable areas and to reduce the concentration of such developments in any one area – the Council is committed to preparing another DPD dealing with this specific type of housing development through the district. For now, the Canalside DPD explains that linear PBSA development will not be suitable along the canal and that such proposals must be in accordance with LP Policy H6 and any made Neighbourhood Plans. This ensures mitigation measures are in place to encourage the appropriate range and mix of housing in the most suitable locations.
- 5.19 The site areas are all located within the urban areas of Warwick and Leamington Spa/Sydenham with good access to local services and facilities. The Grand Union Way is a national long-distance walking route and is a component of the Centenary Way³⁷ – 100 miles of walking networks throughout Warwickshire. The redevelopment and enhancements of these sites, including improved accessibility and safety will encourage more use of the path – to access local services and the wider network – and this could

³⁷ <http://www.gps-routes.co.uk/routes/home.nsf/routeslinkswalks/warwickshire-centenary-way-walking-route>

have synergistic and cumulative positive effects in the longer term that extend beyond the sites through into the wider district and beyond. The use of canals is promoted widely for a range of activities by the Canal & River Trust (CART)³⁸ for boating, angling, walking, cycling, wildlife, art & learning – all with positive effects for health and well-being, both mental and physical.

- 5.20 Policy CS7 requires new and improved directional and informational signage where appropriately designed and located. Policy CS8 encourages the inclusion of public art in new schemes where it makes a positive contribution to the local area. Both these policies will help encourage use of the canal areas for sustainable transport and other activities, further enhancing the positive effects indicated for well-being and health.
- 5.21 Policy CS1 requires that development frontages should address the canal, allowing views and providing much needed surveillance, increasing security and reducing fear of crime. In residential developments this includes maintaining an open view of the canal from residential properties and gardens. Increasing security and reducing crime or fear of crime overall will have positive effects for health and well-being.

Transport:

SA Objective SA No 2 sustainable Transport; SA No 3 Reduce Need to Travel

SEA Directive Topics: Material assets; Population

- 5.22 The increased accessibility and safety of the canal pathways as described previously will have positive effects for objectives on sustainable transport and the location of the sites in urban areas will reduce the need to travel. DPD Policy CS1 requires new or improved safe access to the canal as essential and should be included wherever possible, including bridges and accesses to the canal from nearby roads. Where appropriate, developments should integrate with existing paths, streets, circulation networks and patterns of activity.
- 5.23 CS1 also requires the provision of a towpath which will be wide enough to accommodate pedestrians, cyclists and wheelchair users with the aim of creating a cycle/walking route alongside the canal or, where a towpath already exists, it is widened and/or improved where possible to allow access for all users, without compromising the natural environment. This will ensure implementation of sustainable transport with positive effects that should be cumulative and synergistic in the longer term.
- 5.24 Policy CS2 recognises that parking will be required for new development and requires that it should be in accordance with the Council's adopted Parking Standards. However, the location and setting of the parking should be sympathetic to any environmental, historic or landscape features ensuring that canalside frontages do not present the view of a car park – mitigating any negative effects for SA No 6 the natural environment. CS2 also requires safe

³⁸ <https://canalrivertrust.org.uk/>

parking for cycle and motorcycles where there is adequate surveillance – further contributing to positive effects for SA No 16 to reduce crime or fear of crime. The DPD acknowledges that movement of freight on the canal systems is not viable and that the use of the canals is focused on leisure, access, biodiversity and well-being.

Air Quality & Climate Change:

SA Objective No 9 Good Quality Air; SA No 10 Minimise Causes of Climate Change

SEA Directive Topics: Air; Climate Change

- 5.25 The major threat to air pollution is from traffic emissions³⁹. Warwick District Council has designated five air quality management areas (AQMA) due to elevated annual average concentrations of nitrogen dioxide (NO₂). The AQMAs include Warwick Town Centre, Coventry Road (Warwick), Leamington Spa and two AQMAs in Kenilworth. Guidance on air quality and planning is provided through the Air Quality SPD (January 2019)⁴⁰ that includes information and suggests mitigation measures. Any new development arising from the Canalside DPD will need to take into account other LP policies and the Air Quality SPD such that potential negative effects should be mitigated. The selection of areas of redevelopment within the existing urban areas and with good accessibility to services and facilities should reduce the need to travel by private vehicles and associated reduced traffic emissions.
- 5.26 Policy CS5 recognises that canals are a potential renewable energy resource; canal water could be used for heating and cooling buildings – also for onshore hydropower where practicable. Implementation of such schemes will have positive effects for air quality and climate change in the longer term. The supporting text explains that canals and rivers contribute to urban cooling and thus reduce carbon dioxide emissions. Introducing more soft landscaping and trees into new developments will also contribute to reducing climate change effects in the longer term.

Land/Soil Resources:

SA Objective No 4 Reduce Waste; SA No 5 Land/Soil & Sustainable Construction; SA No 9 Good Quality Soils

SEA Directive Topics: soil

- 5.27 LP Policy NE5 Protection of Natural Resources requires that new development should not give rise to land, air, or water pollution, indicating neutral effects for SA No 9. ensure that, where evidence of contamination exists, the land is made fit for its intended purpose and does not pose an unacceptable risk to sensitive receptors Reuse of previously developed land is an effective use of

³⁹ <https://uk-air.defra.gov.uk/air-pollution/causes>

⁴⁰ https://www.warwickdc.gov.uk/downloads/file/5043/air_quality_spd

land resources and provides mitigation measures by avoiding use of greenfield or best and most versatile agricultural land for development.

Natural Environment:

SA Objective SA No 6 Biodiversity; SA No 6 Landscape; SA No 7 High Quality Design

SEA Directive Topics: Biodiversity, flor, fauna; landscape

- 5.28 The DPD explains the importance of the canals as green corridors for wildlife and people. Policy CS4 requires that new development should incorporate features that recognise, protect and enhance the biodiversity and environmental quality of the canal corridor; a detailed arboricultural survey is also required. An environmental impact report is required where development directly abuts the canal or towpath or is likely to impact on the setting of the canal. These requirements provide mitigation measures to ensure that biodiversity is enhanced and will be implemented with positive effects that will be cumulative in the longer term, helping to extend green infrastructure networks.
- 5.29 Policy CS1 provides detailed guidance for new development with regard to building being of an appropriate scale, height, form and massing, utilising appropriate materials and details. Where appropriate, developments should integrate with existing paths, streets, circulation networks and patterns of activity. Developments should respect and reinforce local architectural and historical distinctiveness, particularly where sites fall within the Canal Conservation Area. New residential development will be assessed against the principles outlined in the Council's Residential Design Guide to ensure that a high standard is attained – further confirming that there should be positive effects for townscape/landscape objectives that will be synergistic and cumulative in the longer term.

Historic Environment:

SA Objective No 8: Historic Environment

SEA Directive Topics: Historic environment

- 5.30 The recent designation of the Canal Conservation Area⁴¹ with documents and maps provides detailed guidance for new development to ensure that the historic environment is understood, protected and enhanced, including the settings of historic assets. Policy CS1 requires that developments should reflect, respect and reinforce local architectural and historical distinctiveness, particularly where sites fall within the Canal Conservation Area, thus providing further mitigation measures and ensuring at least neutral effects with the potential for some positive effects.

⁴¹ https://www.warwickdc.gov.uk/info/20004/planning/1264/canal_conservation_area

- 5.31 The potential for archaeological interest has been recognised and Policy CS3 requires that new development should undertake an assessment of the archaeological status of the site. This provides mitigation measures to further protect the historic environment and avoid or minimise any negative effects.

Water:

SA Objective SA No 11 Adapt to Impacts of climate change – flooding; SA No 9 Good Quality Water

SEA Directive Topics: Water; Climate Change

- 5.32 The adopted Local Plan provides guidance to protect water resources: LP Policy FW4 Water Supply requires developers to ensure that there is an adequate water supply having regard to the Severn Trent Water's WRMP; it also recognises the ecological status of water and requires that development must not affect objectives as set out in the River Severn RBMP. LP Policy NE5 Protection of Natural Resources requires that new development should not give rise to water pollution where the level of discharge, emissions or contamination could cause harm to sensitive receptors; does not result in a reduction in the quality or quantity of groundwater resources. Thus, the Local Plan Policies provide mitigation measures to ensure that there are no significant negative effects on water resources, water levels or water quality.
- 5.33 LP Policies FW1 Reducing Flood Risk and FW2 Sustainable Drainage provide strong clear guidance to ensure that there will be no increase in flood risk and that sustainable water management will be encouraged with requirements for incorporation of sustainable drainage systems (SuDS) that provide biodiversity, water quality and amenity benefits. The LP Policies are further reinforced by DPD Policy CS1 that requires new development should not have an adverse impact on water quality or increase the risk of flooding. Overall, there is strong mitigation provided through embedded policy to ensure no negative effect on the water environment.

Habitats Regulations Assessment (HRA)

- 5.34 The HRA screening (2014)⁴² undertaken of the developing Local Plan concluded that there would be no likely significant effects (LSEs) associated with changes in air quality, water quality and levels, recreational disturbance or habitat loss/fragmentation on Ensor's Pool SAC. The SAC is somewhat isolated as an abandoned claypit and designated for the presence of the white-clawed crayfish such that it was unlikely that the new development proposed in the Local Plan would have any impacts. The pool is clay-lined and not connected to other waterbodies/watercourses; it is replenished through rainfall.
- 5.35 The HRA screening at that time also noted that the need for supplying water from Wales to growing Midland conurbations could have a potential impact

⁴² https://www.warwickdc.gov.uk/downloads/file/2425/b02 - habitat regulations assessment - screening report - _march 2014

on hydrologically dependant Welsh SACs. At that time, Severn Trent Water advised that water resources in the Warwick District area would continue to be sourced locally and therefore, the HRA screening concluded that this would not be a potential issue for the Warwick Local Plan.

- 5.36 The Warwickshire River Avon drains into the Severn Estuary to the south-east and this is designated as a SPA, SAC & Ramsar. The canals are supplied through surfacewater and groundwater sources and therefore, there is the potential for environmental pathways through the water networks. It is considered very unlikely that any development activities arising from the Canalside DPD would have significant effects on designated sites.
- 5.37 The Warwick District area is some 75 km distance⁴³ from the Severn Estuary such that it is considered very unlikely that there is any relevant functionally linked land. It is understood that there is some concern about increased recreational use arising from new development in Gloucestershire and potential impacts on functionally linked habitats used by certain bird species associated with the Severn Estuary SPA/SAC/Ramsar. However, it is considered that the Warwick area is too distant and the limited new development proposed in the Canalside DPD indicates that there would be no LSEs in this respect.
- 5.38 However, it is appreciated that the HRA screening for the Warwick Local Plan was prepared before certain recent CJEU's (2017-2018)⁴⁴ were issued with significant implications for the HRA methods used in the UK. Competent authorities cannot take account of any integrated or additional avoidance or reduction measures when considering at the HRA screening stage whether a plan is likely to have an adverse effect on a European Site. The HRA screening (2014) for the Local Plan reached its conclusions taking into account embedded policy mitigation such as environmental criteria in policies that have to be met.
- 5.39 Therefore, in consideration of the increased awareness and requirements for sustainable water management and building resilience to climate change; the fundamental change to the UK method of undertaking HRA screening/ appropriate assessment with recent updated Government guidance (July 2019)⁴⁵ that takes into account the implications of the CJEU's; increased understanding of potential disturbance on SPA/SAC/Ramsar sites, particularly the Severn Estuary; and since the Canalside DPD is focused on the water environment – the HRA screening with regard to water levels & water quality was updated.
- 5.40 A pragmatic and proportional approach was taken and to clearly demonstrate due process in line with the updated guidance. Since the DPD is focused on canals that are linked to other water systems, there could be the potential for environmental pathways. The Warwick Local Plan does include relevant policy mitigation and this HRA essentially clarifies this through the

⁴³ Measured directly from the centre of the area to the nearest designated point of the Severn Estuary using Defra Magic Mapping <https://magic.defra.gov.uk/MagicMap.aspx>

⁴⁴ For example, please see *People over Wind & Sweetman v Coillte Teoranta* Case C-323/17

⁴⁵ <https://www.gov.uk/guidance/appropriate-assessment>

updated methodology - thus making the process and conclusions explicit with regard to the updated requirements. This precautionary approach is being taken in particular consideration of the significant changes to the HRA process in the UK since the screening undertaken for the Local Plan.

- 5.41 The primary reason for designation of habitats in the Severn Estuary SAC⁴⁶ is for its estuaries, mudflats, sandflats and Atlantic salt meadows; also, for species of lamprey and the Twaite shad. The Severn Estuary SPA⁴⁷ supports internationally important assemblages of overwintering birds with conservation objectives for Bewick's Swan, Gadwall, White-fronted Goose Dunlin, Shelduck and Redshank. The Ramsar⁴⁸ designation relates to the importance of the estuary and river for migratory fish (salmon, trout, lamprey, shad and especially eel) and the particular importance for birds during spring and autumn.
- 5.42 HRA screening indicates that there is the potential for an environmental pathway through the linkages between the water networks of river, canal and groundwater with the River Severn catchment area⁴⁹ covering the Warwick District area. Whilst the extent of the new development that will be supported through the Warwick Canalside DPD is limited, there could be the potential for likely significant effects on the designated site – its functionally linked water and/or land since migratory birds may extend some distance upstream on the River Severn.
- 5.43 Therefore, if this aspect is taken to the second stage of the HRA process – appropriate assessment – the embedded policy mitigation measures may be taken into consideration. Local Plan Policy FW4 Water Supply requires developers to ensure that there is an adequate water supply having regard to the Severn Trent Water's WRMP; it also recognises the ecological status of water and requires that development must not affect objectives as set out in the River Severn RBMP. LP Policy NE5 Protection of Natural Resources requires that new development should not give rise to water pollution where the level of discharge, emissions or contamination could cause harm to sensitive receptors; does not result in a reduction in the quality or quantity of groundwater resources. DPD Policy CS1 that requires new development should not have an adverse impact on water quality or increase the risk of flooding. Local Plan Policy NE1 Green Infrastructure and NE2 Protecting Designated Biodiversity provide further embedded mitigation measures through policy requirements.
- 5.44 Therefore, it was concluded that the Warwick Canalside DPD will not have adverse effects, alone or in combination with other plans and projects, on the integrity of the internationally designated site Severn Estuary SPA/SAC/Ramsar. The major project of HS2 could interact with the DPD. It is explained in the document that only a very small section of the canal on the edge of the district in a rural area would be affected by the new high speed railway. At the time of writing, HS2 has been put on hold for 5 years such that

⁴⁶ <https://sac.jncc.gov.uk/site/UK0013030>

⁴⁷ <http://archive.jncc.gov.uk/pdf/SPA/UK9015022.pdf>

⁴⁸ <http://archive.jncc.gov.uk/pdf/RIS/UK11081.pdf>

⁴⁹ <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/9>

its progress is uncertain at this stage. Mitigation measures are provided through the Local Plan and DPD Policies.

SA of Implementing the Warwick Canalside DPD

- 5.45 Overall, the Canalside DPD is likely to have positive effects for housing and communities. Strong policies are in place to protect and enhance environmental and historic resources and assets with at least effects mitigated to neutral with some enhancements indicating positive effects. For example, the requirements for biodiversity, green infrastructure and landscape/townscape will have positive effects that could be synergistic and cumulative in the longer term.
- 5.46 The DPD recognises likely future business needs, enabling regeneration and new residential development on underused industrial estates that will also facilitate improved accessibility. This is likely to have wider and synergistic effects on sustainable transport and health and well-being through increased safe use.
- 5.47 The DPD helps to resolve existing sustainability problems, for example, the poor access to the canal in certain urban areas and the concerns over crime and anti-social behaviour. Requirements in the DPD to improve access and the canal pathway, and for design/layout to provide surveillance will help reduce problems regarding safety and crime or fear of crime. These positive effects are likely to extend beyond the environs of the canals and development site areas. The approach of developing previously used land has major positive effects for the effective use of land.

6.0 MONITORING

- 6.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance⁵⁰ on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Warwick District Council Monitoring Report (produced annually)⁵¹ is considered sufficient to ensure appropriate monitoring takes place.

⁵⁰ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁵¹ https://www.warwickdc.gov.uk/info/20376/planning_policy/270/monitoring_reports

7.0 CONCLUSIONS, CONSULTATION & NEXT STEPS

- 7.1 The SA has been undertaken according to good practice and in line with Government requirements and guidance. It is aligned with the SA of the adopted Local Plan, following the same methods and approach, and is proportionate - acknowledging the hierarchy of plan-making and the tiering of assessments processes. Overall, the SA has found that the implementation of the Warwick Canalside DPD will have positive effects; mitigation measures for any potential negative effects on the natural and historic environments are provided through policies in the DPD and the Local Plan.
- 7.2 A pragmatic and proportionate HRA screening and appropriate assessment was undertaken to demonstrate that the HRA had been considered in line with recent changes to Government guidance. Whilst unlikely, there is the potential for environmental pathways through the canal and river systems for adverse effects on the internationally protected Severn Estuary and linked land and water. It was demonstrated that there is embedded mitigation through Local Plan and DPD Policies such that there will be no significant effects on the designated Severn Estuary, alone or in-combination with other plans and projects.
- 7.3 This document reports the SA and HRA processes for the Warwick Canalside DPD and is submitted for public consultation alongside the Draft DPD. Any comments on the SA report will be taken into account at the next stage of planning. The DPD will be submitted to the Secretary of State for independent examination by a Planning Inspector.
- 7.4 Any comments on this SA Report should be sent to:

https://www.warwickdc.gov.uk/info/20376/planning_policy

APPENDICES

- I **Statement of Compliance with the SEA Directive & Regulations**
- II **SA of Site-Specific Policies CS9-CS11**

Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004). This is Appendix 1 of the Environmental Report as required by the SEA Directive and the UK SEA Regulations. This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Report (September 2019) - and in accordance with paragraph 32 of the National Planning Policy Framework (revised 2018).

SEA Directive & Regulation Requirements	SEA Report Section	Summary of Contents
<i>An outline of the contents, main objectives of the plan and relationship with other relevant plans</i>	Section 1 Introduction	Sets out the contents and purpose of the Draft Canalside DPD
	Section 3 Context & Baseline	Outlines context, baseline & including the relationship with other relevant plans; also signposts links with the WDC Local Plan & SA/SEA Scoping (2014)
<i>The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan</i>	Section 3 Context & Baseline	Summarises the relevant baseline conditions for environmental/sustainability aspects in the WDC & canalside area, and likely evolution without the DPD
<i>The environmental characteristics of the area likely to be affected</i>	Section 3 Context & Baseline	Summarised in Section 3 of SA Report
<i>Any existing environmental problems which are relevant to the plan including, in particular, those in relation to any areas of a particular environmental importance</i>	Section 3 Context & Baseline	Summarises existing environmental & sustainability issues/problems for the WDC canalside area
<i>The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation</i>	Section 2 SA Methods Section 3 Context & Baseline	Detailed SA Framework guiding assessment of effects against the Objectives – same as in the SA/SEA for the Local Plan.
<i>The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic</i>	Section 2 SA Methods Table 2.1	Presents the SA Framework of objectives that shows the issues listed by the SEA Regulations that are progressed by which SA objective. The draft DPD was assessed against SA objectives by themes to avoid

SEA Directive & Regulation Requirements	SEA Report Section	Summary of Contents
<i>factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects</i>		duplication and address inter-relationships.
<i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan</i>	Section 5 Appendix II	Describes the likely significant effects of implementing the Draft DPD. Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term.
<i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information</i>	Section 5 Section 2 Section 4 table 4.1 Section 2 Method	No significant negative effects were predicted; the SA noted where the Local Plan provided mitigation measures through Policies. There are no other reasonable alternatives to the DPD; site options detailed in Table 4.1. The do-nothing scenario is this is explained in section 2. Outlines how the assessment was undertaken.
<i>A description of the measures envisaged concerning monitoring</i>	Section 6	Outlines measures proposed for monitoring the environmental effects of the implementation of the Draft WNP.
<i>A non-technical summary of the information provided under the above headings</i>	Report preface	Provides a non-technical summary.

Warwick Canalside DPD: Sustainability Appraisal Appendix II SA of Site-Specific Policies

Policy CS9: Further Redevelopment of Sydenham Industrial Estate for Residential Use																
SA Objectives	Economy	Sustainable transport	Reduce need to travel	Waste & Recycling	Prudent use of land & natural resources	Natural environment & landscape	Safe & High-Quality Built environment	Historic environment	Air, water & soil quality	Climate change mitigation	Climate change adaptation - flood risk	Housing needs	Local services & community facilities	Health & well being	Poverty & social exclusion	Crime
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Appraisal Summary	=	+ +	+	=	++	+ +	+	+	=	+	=	+	=	+	+	+
Commentary:																
<p>The Industrial Estate has already seen rationalisation and been partly redeveloped along the canal and Sydenham Drive boundaries for new housing. The review of industrial estates undertaken to inform the Local Plan found that this estate no longer reflects the requirements of many businesses as explained in Local Plan Policy DS8 Employment Land. Employment land to meet needs is allocated in Policy DS9 and guided through Policy EC1 Directing New Employment Development and Policy EC3 Protecting Employment Land & Buildings. Therefore, there are no significant effects through loss of this industrial estate land on employment and neutral effects for SA No 1.</p> <p>The estate area is well located for sustainable transport within the urban area of Sydenham/Leamington Spa, close to bus stops and the railway station; provision of housing within an area close to services and facilities and sustainable transport is likely to reduce the need to travel and to help reduce congestion elsewhere but some uncertainty – minor positive effects for SA Nos 2 & 3. All new development can reduce waste & increase recycling in accordance with other LP Policies – neutral effects.</p> <p>Reuse of previously developed land has major positive effects for prudent use of land and resources, reducing loss of greenfield or agricultural land.</p> <p>Local Plan Policy NE3 Biodiversity requires new development to lead to no net loss and where possible a net gain; DPD Policy CS4 requires protection and enhancement of the canal green corridor – all with positive effects for biodiversity that could be synergistic and cumulative in the longer term.</p>																

Proposals must comply with LP Policy BE1 Layout & Design and DPD Policy CS1 that requires new development to be of an appropriate scale, height, form and massing, utilising appropriate materials and details; and reflect, respect and reinforce local architectural and historical distinctiveness, particularly where sites fall within the Canal Conservation Area. New and redevelopments will build upon the character and identity of the area providing enhancements and aligned with the Council's Residential Design Guide with positive effects for landscape/townscape for SA Nos 6 & 7, including frontages that provide surveillance, increase security and reduce fear of crime – thus helping to resolve an existing sustainability problem for safety & fear of crime with positive effects for SA No 16 to reduce crime, fear of crime, and anti-social behaviour.

The historic environment is protected through LP Policies HE1-4 and DPD Policy CS1 requires new development to respect and reinforce the local historical distinctiveness indicating at least neutral effects but likely positive effects through regeneration, enhancement of the built environment; further mitigation is provided through DPD CS3 requiring an archaeological assessment – overall likely positive effects. The nearest listed buildings are some 150m distance⁵² to the north on St Mary's Road.

LP Policy NE5 Protection of Natural Resources requires that new development should not give rise to air, or water pollution, indicating neutral effects for SA No 9.

New development must comply with LP Policies CC1-2 on climate change adaptation including sustainable construction, multifunctional green infrastructure, and water efficiency (also Policy FW3) - with minor positive effects that will be cumulative in the longer term. DPD Policy CS5 requires that canals should be recognised as a potential renewable energy resource. All development must also comply with LP Policy FW1 Reducing Flood Risk indicating at least neutral effects; reinforced by DPD Policy CS1 that requires there should be no increase in the risk of flooding.

Provision of housing will have positive effects for SA No 12. Policy CS9 requires provision of 100% low cost housing as a mix of affordable rented, private low cost and shared ownership units according to the current housing need in the area – and this will contribute to positive effects for SA No 15 aiming to reduce poverty and social exclusion.

DPD Policy CS1 requires new or improved safe access to the canal; this is reinforced by DPD Policy CS9 that requires any existing access to the canal to be maintained and improved with new public access, where possible – all contributing to enhanced access to the community asset of the canal with positive effects for SA No 13.

Provision of good quality housing will contribute to health and wellbeing; enhanced access to the canal for walking, cycling and other leisure or reflective activities will all encourage a healthier lifestyle and contribute to positive effects for health & wellbeing and SA No 14.

⁵² Measured approximately through Defra Magic mapping <https://magic.defra.gov.uk/MagicMap.aspx>

Policy CS10: Industrial Estate at Millers Road/Cape Road, Warwick – new residential & retention of some employment																
SA Objectives	Economy	Sustainable transport	Reduce need to travel	Waste & Recycling	Prudent use of land & natural resources	Natural environment & landscape	Safe & High-Quality Built environment	Historic environment	Air, water & soil quality	Climate change mitigation	Climate change adaptation - flood risk	Housing needs	Local services & community facilities	Health & well being	Poverty & social exclusion	Crime
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Appraisal Summary	=	+ +	+	=	++	+ +	+	=	=	+	=	+	=	+	+	+
Commentary:																
<p>The supporting text explains that this potential site at Millers Road/Cape Road will only come forward when demand falls off for the industrial units and only likely when they are no longer fit for purpose. Therefore, rationalisation will be required before redevelopment to ensure that the area is considered in a holistic way. Employment land to meet needs is allocated in Policy DS9 and guided through Policy EC1 Directing New employment Development and Policy EC3 Protecting employment Land & Buildings. Therefore, there are no significant effects through loss of this industrial estate land on employment and neutral effects for SA No 1.</p> <p>The estate area is well located for sustainable transport within the urban area of Warwick, close to bus stops and about 1.5 km⁵³ walk to the railway station Warwick Parkway; provision of housing within an area close to services and facilities and sustainable transport is likely to reduce the need to travel and to help reduce congestion elsewhere but some uncertainty – minor positive effects for SA Nos 2 & 3. All new development can reduce waste & increase recycling in accordance with other LP Policies – neutral effects.</p> <p>Reuse of previously developed land has major positive effects for prudent use of land and resources, reducing loss of greenfield or agricultural land.</p> <p>Local Plan Policy NE3 Biodiversity requires new development to lead to no net loss and where possible a net gain; DPD Policy CS4 requires protection and enhancement of the canal green corridor – all with positive effects for biodiversity that could be synergistic and cumulative in the longer term. DPD Policy CS10 requires provision of an area of green space immediately adjacent to the canal for biodiversity and trees/shrubs – contributing to the green infrastructure network with potential for major positive effects.</p>																

⁵³ Measured approximately through google maps <https://www.google.com/maps/>

Proposals must comply with LP Policy BE1 Layout & Design and DPD Policy CS1 that requires new development to be of an appropriate scale, height, form and massing, utilising appropriate materials and details; and reflect, respect and reinforce local architectural and historical distinctiveness, particularly where sites fall within the Canal Conservation Area. New and redevelopments will build upon the character and identity of the area providing enhancements and aligned with the Council's Residential Design Guide through CS1 with positive effects for landscape/townscape for SA Nos 6 & 7.

The historic environment is protected through LP Policies HE1-4 and DPD Policy CS1 requires new development to respect and reinforce the local historical distinctiveness indicating at least neutral effects but likely positive effects through regeneration, enhancement of the built environment. There are no Listed buildings in the vicinity and the nearest Scheduled Monument is St Sepulchre's Priory some 1.5 km to the south - overall likely neutral effects.

LP Policy NE5 Protection of Natural Resources requires that new development should not give rise to air, or water pollution, indicating neutral effects for SA No 9.

New development must comply with LP Policies CC1-2 on climate change adaptation including sustainable construction, multifunctional green infrastructure, and water efficiency (also Policy FW3) - with minor positive effects that will be cumulative in the longer term. DPD Policy CS5 requires that canals should be recognised as a potential renewable energy resource. All development must also comply with LP Policy FW1 Reducing Flood Risk indicating at least neutral effects; reinforced by DPD Policy CS1 that requires there should be no increase in the risk of flooding.

Provision of housing will have positive effects for SA No 12. Policy CS10 requires at least the minimum percentage (40%) of affordable homes – and this will contribute to positive effects for SA No 15 aiming to reduce poverty and social exclusion.

DPD Policy CS1 requires new or improved safe access to the canal; this is reinforced by DPD Policy CS10 that requires an open access to the canal to be maintained with new public access in suitable locations – all contributing to enhanced access to the community asset of the canal with positive effects for SA No 13.

Provision of good quality housing will contribute to health and wellbeing; enhanced access to the canal for walking, cycling and other leisure or reflective activities will all encourage a healthier lifestyle and contribute to positive effects for health & wellbeing and SA No 14.

It is understood that there are no known particular problems associated with this estate and therefore neutral effects for SA No 16 to reduce crime, fear of crime, and anti-social behaviour. Nonetheless, the new residential development will provide surveillance and likely improvements in safety with some positive effects but uncertainty of significance at this stage.

Policy CS11: Potential Residential Development of former School at Montague Road, Warwick

SA Objectives	Economy	Sustainable transport	Reduce need to travel	Waste & Recycling	Prudent use of land & natural resources	Natural environment & landscape	Safe & High-Quality Built environment	Historic environment	Air, water & soil quality	Climate change mitigation	Climate change adaptation - flood risk	Housing needs	Local services & community facilities	Health & well being	Poverty & social exclusion	Crime
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Appraisal Summary	=	+ +	+	=	++	+ +	+	+	=	+	=	+	=	+	+	+

Commentary:

The proposed area does not include any extant employment units and neutral effects for SA No 1.

The area is well located for sustainable transport within the urban area of Warwick, close to bus stops and some 600m distance⁵⁴ from the Warwick railway station; provision of housing within an area close to services and facilities and sustainable transport is likely to reduce the need to travel and to help reduce congestion elsewhere but some uncertainty – minor positive effects for SA Nos 2 & 3. All new development can reduce waste & increase recycling in accordance with other LP Policies – neutral effects.

Reuse of previously developed land has major positive effects for prudent use of land and resources, reducing loss of greenfield or agricultural land. It is noted that the DPD draws attention to recent proposals where contamination of the previously used land has been raised as an issue. DPD Policy CS11 requires that any identified contamination should be dealt with to the satisfaction of the Council's environmental health officer and an environmental statement should be submitted with any planning application – providing mitigation measures to resolve any potential negative effects.

Local Plan Policy NE3 Biodiversity requires new development to lead to no net loss and where possible a net gain; DPD Policy CS4 requires protection and enhancement of the canal green corridor – all with positive effects for biodiversity that could be synergistic and cumulative in the longer term. DPD Policy CS11 requires provision of a green space as a linear park from the Coventry Road Bridge alongside the canal indicating further positive effects for biodiversity and the green infrastructure network.

⁵⁴ Measured approximately through google maps <https://www.google.com/maps/>

Proposals must comply with LP Policy BE1 Layout & Design and DPD Policy CS1 that requires new development to be of an appropriate scale, height, form and massing, utilising appropriate materials and details; and reflect, respect and reinforce local architectural and historical distinctiveness, particularly where sites fall within the Canal Conservation Area. New and redevelopments will build upon the character and identity of the area providing enhancements and aligned with the Council's Residential Design Guide through CS1 with positive effects for landscape/townscape for SA Nos 6 & 7.

The historic environment is protected through LP Policies HE1-4 and DPD Policy CS1 requires new development to respect and reinforce the local historical distinctiveness indicating at least neutral effects but likely positive effects through regeneration, enhancement of the built environment. The nearest listed building is Grade II Bridge House adjacent to the Coventry Road Bridge and redevelopment should enhance the setting of this building; other listed buildings are over 250m distance⁵⁵ to the south.

LP Policy NE5 Protection of Natural Resources requires that new development should not give rise to air, or water pollution, indicating neutral effects for SA No 9. It is noted that the DPD draws attention to recent proposals where air pollution has been raised as an issue and it is assumed that this relates to emissions from traffic, parking and any contamination from previous uses of the land. Any further proposals will need to comply the DPD CS2 Parking and the Warwick Air Quality SPD, indicating that there are mitigation measures in place to progress any effects towards neutral for air quality.

New development must comply with LP Policies CC1-2 on climate change adaptation including sustainable construction, multifunctional green infrastructure, and water efficiency (also Policy FW3) - with minor positive effects that will be cumulative in the longer term. DPD Policy CS5 requires that canals should be recognised as a potential renewable energy resource.

All development must also comply with LP Policy FW1 Reducing Flood Risk indicating at least neutral effects; reinforced by DPD Policy CS1 that requires there should be no increase in the risk of flooding.

Provision of housing will have positive effects for SA No 12. Policy CS11 does not specify any particular provision for low cost housing – and therefore, indicating neutral effects for SA No 15 aiming to reduce poverty and social exclusion. However, it is expected that the affordable housing provision will be met through the LP Policy specifying 40% on a site of the expected size of this development – therefore, positive effects for SA No 15.

DPD Policy CS1 requires new or improved safe access to the canal; this is reinforced by DPD Policy CS11 that requires easy access to the canal towpath from the Coventry Road Bridge and at a point along the frontage of the development next to the canal – all contributing to enhanced access to the community asset of the canal with positive effects for SA No 13.

Provision of good quality housing will contribute to health and wellbeing; enhanced access to the canal for walking, cycling and other leisure or reflective activities will all encourage a healthier lifestyle and contribute to positive effects for health & wellbeing and SA No 14.

⁵⁵ Measured approximately through Defra Magic mapping <https://magic.defra.gov.uk/MagicMap.aspx>

DPD Policy CS11 requires surveillance of the canal to be provided through the careful location of dwellings indicating positive effects for SA No 16 to reduce crime, fear of crime, and anti-social behaviour.