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Our ref: 418379



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Policy Team

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BY EMAIL ONLY

Dear Policy Team

South Warwickshire Local Plan (SWLP) Issues and Options Consultation:

- **Habitats Regulations Assessment (HRA)**
- **Sustainability Appraisal (SA)**

Thank you for your consultation on the above dated 09 January 2023 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Preliminary HRA Scoping Report (November 2022)

Natural England welcomes the production of the preliminary HRA scoping report at this early stage of the plan making process. We welcome this thorough and clearly presented report.

We agree with the Habitats sites identified for consideration in section 5 and the assessment of the potential impact pathways described in section 6.

Air quality

We agree with the thought process described in *Table 6.1 Atmospheric pollution pathways of impact to Habitats sites within 20km of the SWLP administrative area* and conclusion that air quality likely significant effects can be screened out of the HRA process.

Hydrology

We agree with the scoping outcome in *Table 6.2 Water resource, levels and quality pathways of impact to Habitats sites* and fully support recommendations outlined in Table 6.3.

Recreation

We welcome the precautionary approach to scope in the Bredon Hills Special Area of Conservation for consideration of recreational disturbance pathway and fully support recommendations outlined in *Table 6.5*. In particular, the recommendation that the Councils ensure formal and informal recreation provision is sufficient to accommodate level of growth set out in the SWLP.

Urbanisation effects

We agree with the thought process described and conclusion that there are unlikely to be any urbanisation effects as a result of the SWLP.

Functionally linked land

We welcome the precautionary approach taken with regards to consideration of the potentially functionally linked lands associated with the Severn Estuary and Humber Estuary designations and fully support recommendations outlined in *Table 6.6*.

We welcome the broad spectrum of plans included in Appendix A for in-combination assessment.

We would be happy to provide further comments as the HRA progress.

Sustainability Appraisal (November 2022)

Natural England welcomes the SA report prepared for the Issues and Options stage of the SWLP. We generally agree with the SEA Topic methodologies and assumptions applied to the appraisal process for SA Objectives. We note the current limitations to the assessment process and assumptions. We support recommendations for further research recommended on the biodiversity assessment and landscape assessment of Broad Locations. We would be happy to provide detailed comments on SA of the SWLP once the preferred options have been selected.

If you have any queries relating to the advice in this letter please contact me on yana.burlachka@naturalengland.org.uk

Yours faithfully

Yana Burlachka
Planning for a Better Environment – West Midlands Team