

SOUTH WARWICKSHIRE LOCAL PLAN ISSUES AND OPTIONS CONSULTATION RESPONSE TO SUSTAINABILITY APPRAISAL (NOVEMBER 2022)

Vistry Group (“Vistry”) have a series of comments on the Sustainability Appraisal (“**SA**”) prepared to support the South Warwickshire Local Plan (“**SWLP**”) Issues and Options consultation draft document. These are set out below on a topic basis in the same order that matters are raised in the SA.

Chapter 2 – Topic Specific Methodologies, Impact Scoring Index and Assumptions

We support the SA testing the Growth Options against the 13 criteria identified in paragraph 2.21 of the report. These criteria accurately reflect the objectives of the SWLP and the topics identified in Annex 1(f) of the SEA directives. The outcomes of the assessment process should, however, be treated with a degree of caution.

The SA is a snapshot in time. It assesses the sustainability of the Growth Options and potential locations for allocation on the basis of the current services and facilities that are available and existing constraints. For example, when assessing the potential locations for development against Matter 11 – Education, regard has been had to existing education provision in the locality. It does not, however, consider how new development could improve local education facilities through the provision of new education infrastructure such as a new school that would be of benefit to the local area generally.

Sustainability Appraisals are an iterative process, until the current Call for Sites consultation is completed and responses reviewed the local authorities will not have a clear understanding of what services and facilities are being promoted with the various development opportunities being presented. However, in due course this should be a key consideration for the local authorities in determining the preferred strategy, growth options and allocations within the SWLP.

Climate Change

Whilst we fully support the assessment of the proposals against climate change objectives, we have concerns with the way in which this has been applied in the SA.

Paragraph 2.4.6 of the SA states that the Broad Locations (2,000+ houses) and New Settlements (6,000+ houses) are likely to increase greenhouse gas emissions by more than 1% and adversely affect climate change. Developments of between 50 to 500 dwellings could increase greenhouse gas omissions by more than 0.1% and have a lesser effect on climate change than the larger sites. Whilst this may be the case in principle, it is somewhat misleading and does not reflect the reality of the way in which the SWLP will deliver housing.

The SWLP will have a set housing requirement. The greenhouse gas emissions from the construction of these properties will have a total accumulative impact based on the total number of houses built. The total amount of greenhouse gas omitted as part of the construction of these houses will be broadly the same, regardless of whether the houses are provided on a larger number of small sites or a smaller number of large sites.

Larger scale developments are unlikely to have a greater impact on greenhouse gas emissions than smaller schemes. Large scale developments are more likely to provide onsite infrastructure, such as schools, places to work, local services and facilities than small scale developments. In terms of the Rail Corridor Growth Option, it will help facilitate sustainable commuting patterns. Smaller schemes of 50 to 500 dwellings are less likely to provide onsite infrastructure or have the benefit of close proximity to a train station. It is, therefore, inappropriate for the climate change appraisal to penalise larger sites in comparison to smaller sites due purely to their size.

It is also suggested that development of greenfield sites for housing has a potential to lead to local, long term significant adverse effects in the form of increasing flooding, drought and storm events. This is not necessarily the case. Indeed, it is not uncommon for new development to introduce flood risk and drainage control measures that improve the flood risk and drainage situations locally. New developments must achieve greenfield run off rates and often can be used to address localised problems associated with flood risk.

Biodiversity and Geodiversity

The impact of development on biodiversity and geodiversity is a clear consideration in the SA process. However, we note that the SA advises that no detailed ecological surveys have been completed at this stage to inform the assessments in the report (paragraph

2.6.14) and detailed ecology surveys and assessments will determine, on a site by site basis, the presence of priority species and priority habitats (paragraph 2.6.12). The SA has, therefore, made assumptions about the sensitivity or otherwise of potential development options from an ecological basis linked to their proximity to identified assets rather than on an evidential basis.

The SA's conclusions reached regarding the ecological sensitivity of the development option needs to be treated with a degree of caution. If more detailed site specific ecological information is available from the Call for Site submissions this should be actively considered in the site selection process.

Landscape

The SA advises at paragraph 2.7.2 that detailed designs for each development appraisal are uncertain at this stage of the assessment. The landscape assessment is a desk based exercise which has not been verified in the field. Therefore, the nature of potential impacts on the landscape are, to an extent, uncertain. The SA recommended that landscape sensitivity and capacity studies would be helpful later in the plan making process once Preferred Options have been identified.

The landscape appraisal selection of the SA should be treated with some caution as the evidence base is not complete.

Paragraph 2.7.6 states that large scale residential-led development is likely to adversely impact the countryside and urban area where the various reasonable alternative development locations are located. This is a broad brush conclusion. Whilst development may impact on the landscape, impacts are not automatically negative. Indeed, well designed and high quality landscaping could potentially enhance the landscape character of a development area.

Cultural Heritage

Paragraph 2.8.3 of the SA confirms that the impacts on heritage assets will largely be determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. At this stage, the risk of substantial harm to the significance of the heritage asset has been assessed based on the nature and significance of, and proximity of sites to, the heritage asset in question. It is also advised

that whilst the Heritage and Settlement Sensitivity Assessment is being prepared, this assessment was not available for use at the time of undertaking the SA process.

The conclusions of the SA on cultural heritage impact must be treated with caution. Where site specific heritage information has been provided with Call for Sites submissions this should be considered in the site selection process.

Environmental Pollution

We are concerned with some of the assessment criteria used within the environmental pollution section. Development proposals that are within 200 metres of a railway station are negatively scored. Development proposals located over 200 metres from a railway station have a neutral score. Development proposals which would help to reduce the pressure on railway lines by locating further away have a positive score.

The SWLP correctly recognises that there are significant benefits in a Rail Corridor Growth Option and that providing access to a train station reduces the need for people to travel using the private car. The approach of the SA in this regard directly conflicts with the Rail Corridor Growth Option.

It is suggested that schemes within 200 metres of a major road may have adverse sustainability credentials due to road related air and noise emissions. It does not automatically follow that because the site is within the 200 metres of a main road that a suitable noise and environmental air quality cannot be achieved. This assessment criteria should be reconsidered.

Natural Resources

The SA has a flawed approach adopted towards assessing the agricultural land implications of development. Development proposals that include over 20 hectares of Grade 1, 2 or 3 agricultural land score a 'double negative'. Development proposals that include an area of land of less than 20 hectares of Grade 1, 2 or 3 agricultural land have a 'single negative' impact.

The SWLP will have to allocate land to deliver a set amount of housing. This will be from a combination of brownfield and greenfield sites. The amount of agricultural land developed in the plan area as a whole is likely to be fixed, as the housing requirement will be fixed.

However, the approach of the SA means that it favours the allocation of a large number of smaller sites (less than 20 hectares) rather than a small number of large sites (more than 20 hectares) whilst the total amount of agricultural land developed is likely to be the same.

Health Impact

The health SA criteria consider the proximity of development to a GP surgery and leisure facilities. Development locations that are closer to GP surgeries and leisure facilities are preferred to those rather than those that are removed.

Whilst we support this approach it does not necessarily follow that a site is in close proximity to a doctor's surgery there will be available spaces for patients. Furthermore, some schemes will be able to provide doctor's surgery and leisure facilities on site.

Similarly, the development options are scored down if they are more than 800 metres from an area of green space, or 600 metres away from a public right of way or cycle path. Development proposals will, in all likelihood, provide onsite green space to meet their needs, and may be able to provide connections to nearby footpaths/cycle paths.

Accessibility

The SA accessibility assessment criteria for proximity to bus stops and food stores gives a negative sustainability rating to potential development locations that are more than 400 metres from a bus stop and more than 800 metres from a food store. Whilst this is a sensible starting point, large scale developments will, in all likelihood, provide new bus stops and convenience stores. Indeed, we would fully expect the local authority to require larger schemes to include a local centre.

Similarly, development options that are located over 800 metres from a primary school have a negative rating. Large scale sites are likely to provide primary schools. Primary school provision to be a key component of any scheme providing 800+ dwellings.

Economy

The SA assessment criteria for economic opportunities penalises schemes that are more than 5km from a "key employment location" whilst positively scored sites that are within 5km of a key employment location. Large scale residential sites are likely to provide

employment opportunities as part of the overall proposals. It is inappropriate for the SA to penalise such sites in the SA when employment land accessibility will be rectified by onsite provision.

Evaluation of Broad Locations at the Main Settlements

Southam

Vistry control land within the north east of Southam search area. The Southam appraisal, includes at paragraph 4.13.1 of the plan, includes a series of inaccuracies regarding the development potential of this area.

It is advised that Southam north west is located in close proximity to Thorpe Rough Ancient Woodland, and development here could have adverse impact on the woodland. Whilst this may be the case, the land in Vistry's control that forms part of this area is significantly smaller than the Southam north east appraisal area. It will not result in development in close proximity to Thorpe Rough Ancient Woodland.

There are no ecology constraints to the development of the site. A Phase 1 of the ecology survey report of the site has been undertaken. There are no ecological constraints that cannot be overcome and the site can provide 10% biodiversity net gain.

In terms of landscape impact, Vistry's land interest at Southam have previously been identified as part of a potential Reserve Housing Site in the Preferred Options Site Allocations Plan. Detailed representations have been submitted to the Site Allocations Plan consultation that demonstrated that the site is entirely deliverable from a landscape perspective. This is confirmed in the Vision Statement that accompanies our Call for Sites submission.

The Council have previously ruled out all development options to the west of Southam on the basis of landscape impact. Paragraph 4.11.9 of the SA advises that the Broad Locations to the west of Southam would result in the development of high/medium and high sensitivity landscape parcels. This is clearly a significant constraint to development meaning that the land to the east of Southam should be favoured.

Furthermore, and significantly, the conclusions table for Southam in the SA does not reflect the assessment work in the SA. It is suggested by the table at paragraph 4.13.1 that

Southam south west is “best” for education provision, however, paragraph 4.12.1 advises that Southam north east is the best performing in terms of education provision.

If this error is corrected it means that Southam north east scores “best” for four criteria. Southam north west has “one” best result, Southam east has “two” best results and Southam south west has “three” best score. The SA for Southam should have concluded that Southam north east is the most appropriate location for further development.