

North Warwickshire Council

Strategic Environmental Assessment of the North Warwickshire Local Plan Adoption Statement

Final report

Prepared by LUC

September 2021



North Warwickshire Council

**Strategic Environmental Assessment of the North
Warwickshire Local Plan
Adoption Statement**

Version	Status	Prepared	Checked	Approved	Date
1.	Draft SEA Adoption Statement for the North Warwickshire Local Plan	K. Nicholls	J. Allen	K. Nicholls	24.09.2021
2.	Final SEA Adoption Statement for the North Warwickshire Local Plan	K. Nicholls	J. Allen	K. Nicholls	29.09.2021

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FS566056



EMS566057



OHS627041



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Chapter 1

Introduction

1.1 North Warwickshire Borough Council (NWBC) adopted the North Warwickshire Local Plan in September 2021.

1.2 During the preparation of the Local Plan, NWBC was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the Local Plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports which were published alongside the different versions of the Local Plan during its development.

1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires NWBC to make the final SA Report available alongside the adopted Local Plan.

1.4 The SA Report for the Draft Submission (Regulation 19) Local Plan (December 2017) was published alongside the Local Plan for public consultation between December 2017 and March 2018. That SA Report was submitted alongside the Local Plan for examination later in March 2018.

1.5 Examination hearings took place in September 2018, February and April 2019 and again in December 2020, following which schedules of Main and Minor Modifications to the submitted Local Plan were prepared and published for public consultation between March and April 2021. An SA Addendum Report (February 2021) was prepared and published alongside the Main Modifications during the consultation. In conjunction with the SA Report that was submitted alongside the Local Plan for examination, the SA Addendum Report represented an appraisal of the NWBC Local Plan as proposed to be modified, updating the appraisal findings presented in the December 2017 SA Report.

1.6 The final SA report for the adopted North Warwickshire Local Plan therefore comprises the December 2017 SA Report and the February 2021 SA Addendum Report, including the Non-Technical Summaries of both documents.

1.7 Following receipt of the Inspector's Report, NWBC made a small number of final changes to the adopted Local Plan. These are minor changes which do not affect the meaning of the Local Plan policies or how the Plan will be implemented, and as such are not subject to consultation or further SA work.

1.8 In the Inspector's Report published in July 2021 the Inspector concluded that SA has been carried out and is adequate.

Requirement for the Adoption Statement

1.9 In addition to the requirement in Regulation 26 of the Town and Country Planning (England) Regulations (2012) for the final SA report to be published alongside the adopted Plan, the SEA Regulations¹ also require a number of steps to be taken upon adoption of a plan (in this case the North Warwickshire Local Plan). Specifically, SEA Regulation 16 sets out the post adoption procedures and requirements for SEA. The planning authority must, as soon as is reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, make a copy of the plan publicly available alongside a copy of the SA report and an 'SEA adoption statement', and inform the public, Historic England, Natural England and the Environment Agency about the availability of these documents. The SEA adoption statement must explain:

- How environmental (and sustainability) considerations have been integrated into the Plan.
- How the Environmental Report has been taken into account during the preparation of the Plan.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and the Environmental Report have been taken into account.
- The reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Plan.

1.10 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the North Warwickshire Local Plan. The remainder of the document is structured according to the SEA Regulation requirements listed above as follows:

- **Chapter 2** summarises how environmental considerations have been integrated into the Local Plan including by explaining who carried out the SA/SEA and what assessment framework was used.
- **Chapter 3** summarises how the Environmental Report has been taken into account, considering the links between the plan-making and SA/SEA processes.
- **Chapter 4** summarises the consultation opinions provided on the Environmental Report at each stage and describes how the results were taken into account.

- **Chapter 5** describes why the Adopted Local Plan was chosen, in light of the other reasonable alternatives dealt with.
- **Chapter 6** describes how the significant environmental effects of the implementation of the Local Plan will be monitored

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit)

Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531).

Chapter 2

How environmental considerations have been integrated into the Local Plan

2.1 The SA (incorporating SEA) process for the North Warwickshire Local Plan dates back to October 2006 when NWBC prepared the SA/SEA Scoping Report for the Local Development Framework (LDF) that the Council intended to prepare at the time. The LDF was to comprise the Core Strategy (which was adopted in 2014) along with a Site Allocations DPD which would have allocated specific sites for development, building on the overall spatial strategy set out in the Core Strategy, and a Development Management Plan which would have set out policies relating to the management of development in the Borough. In 2016 NWBC decided to instead bring forward and revise as necessary the policies in the adopted Core Strategy and to draw together the work that had been carried out to date on the Site Allocations DPD and the Development Management Plan (neither of which had been adopted) into a single Local Plan document. Therefore, while from 2016 onwards the Local Plan that has now been adopted was being prepared as a single comprehensive plan, earlier stages of work in the SA/SEA process for the Local Plan related to either the Site Allocations DPD or the Development Management Plan specifically.

2.2 From 2013 LUC provided SA/SEA support to NWBC, carrying out various stages of the work in relation to the Site Allocations DPD and the Development Management Plan either collaboratively with Council officers or entirely on the Council's behalf. After NWBC made the decision to prepare a comprehensive new Local Plan in place of the LDF, LUC was commissioned to jointly prepare the SA Report for the Draft Local Plan (February 2017) with NWBC officers. LUC then prepared the December 2017 SA Report for the Draft Submission (Regulation 19) Local Plan entirely on behalf of the Council, as well as the SA Addendum Report for the Main Modifications (February 2021) and this SA/SEA Adoption Statement.

2.3 The purpose of the SA was to assist NWBC in preparing the Local Plan by identifying the key sustainability issues that face North Warwickshire, to predict what the likely effects of the Local Plan on these issues would be and to put forward recommendations to mitigate and monitor any negative effects identified. The aim was to help ensure that the Local Plan has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible

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alongside implemented policies, particularly those resulting in new development within North Warwickshire.

2.4 The SA was undertaken iteratively, such that at each stage of the Local Plan's preparation, the sustainability and environmental effects of the options for the Plan were assessed. SA reports were produced to describe the approach taken, identify the likely effects of the Local Plan and make recommendations as to how significant negative effects could be avoided and mitigated and significant positive effects enhanced. In this way, environmental and sustainability considerations were integrated into the Local Plan as it was developed. **Chapter 3** expands on how the findings of the SA process have been taken into account throughout the plan-making process.

2.5 The way in which the environmental and sustainability effects of the Local Plan were consistently described,

analysed and compared was through the use of a set of SA objectives referred to as an 'SA framework'. The SA framework that was used to appraise the North Warwickshire Local Plan (and which was also used previously during the appraisal of the Site Allocations DPD and the Development Management Plan) is presented in **Table 2.1** below. It was developed during the Scoping stage of the SA process for the LDF in 2006 from the information collated in the review of plans and programmes, baseline analysis and identification of sustainability issues and was consulted upon as part of the SA Scoping Report, as well as during consultations on later SA reports. The second column shows how the 'SEA topics' (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives.

Table 2.1: SA Framework for the North Warwickshire Local Plan

SA Objectives	SEA Topic(s)
1. Equal access to services, facilities and opportunities for all, regardless of income, age, health, disability, culture or ethnic origin.	Material assets Population
2. Developing and supporting vibrant and active communities and voluntary groups, who are able to express their needs and take steps towards meeting them.	Material assets Population
3. Tackling health inequalities and improve health by supporting local communities and by improving access and raising awareness.	Human health
4. Providing decent and affordable housing to meet local needs.	Material assets Population
5. Reducing crime, fear of crime and antisocial behaviour.	Human health Population
6. Providing opportunities to participate in recreational and cultural activities.	Human health Material assets
7. Valuing, enhancing and protecting the assets of the natural environment of North Warwickshire, including landscape character.	Landscape
8. Valuing, enhancing and protecting the quality and distinctiveness of the built environment, including the cultural heritage.	Cultural heritage
9. Valuing, enhancing and protecting the biodiversity of North Warwickshire.	Biodiversity Flora Fauna
10. Ensuring development makes efficient use of previously developed land, buildings and existing physical infrastructure in sustainable locations.	Soil
11. Maintaining the resources of air, water and productive soil, minimising pollution levels.	Air Soil Water
12. Minimising North Warwickshire's contribution to the causes of climate change whilst implementing a managed response to its unavoidable impacts.	Climatic factors
13. Reducing overall energy use through sustainable design, increasing energy efficiency and increasing the proportion of energy generated from renewable sources.	Climatic factors
14. Using natural resources efficiently.	Material assets
15. Increasing use of public transport, cycling and walking and reducing use of the private car.	Air

SA Objectives	SEA Topic(s)
	Human health
16. Encouraging and enabling waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream.	Material assets
17. Encouraging local sourcing of goods and materials.	Material assets
18. Creation of a modern, healthy and diverse economy which is able to adapt to changes in the wider economy while remaining relevant to the needs of local people.	Material assets
19. Maintaining and enhancing employment opportunities and reducing the disparities arising from unequal access to jobs.	Material assets
20. Ensuring that people of all ages are provided with the opportunity to obtain the skills, knowledge, confidence and understanding to achieve their full potential.	Population Material assets

Habitats Regulations Assessment

2.6 The Local Plan was also required to be subject to Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (as amended) (and previous versions of these Regulations, as applicable at the time of preparing each stage of the HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the North Warwickshire Local Plan was undertaken and reported on separately from the SA.

2.7 The HRA Report that was submitted alongside the Local Plan for examination was prepared by LUC on behalf of NWBC in December 2017 in relation to the Proposed Draft Submission (Regulation 19) Local Plan. An updated HRA Report was prepared by LUC in February 2021 to consider the implications of the proposed Main Modifications for the HRA findings reported previously. It concluded that the Main Modifications did not change the conclusions of the 2017 HRA Report, which are that no adverse effects on integrity will occur at any European sites as a result of the Local Plan, either alone or in-combination with other plans or projects.

Chapter 3

How the Environmental Report has been taken into account

3.1 As explained in the previous chapter, the SA process for the North Warwickshire Local Plan was undertaken iteratively, with the SA reports prepared at each stage informing the preparation of the Plan. As part of the SA process, an assessment of the sustainability and environmental effects was made at each stage of the Local Plan's development.

3.2 The SA assessed all policies and proposals in each iteration of the Local Plan and their reasonable alternatives, including the modifications made to the Local Plan following its submission. This helped NWBC to formulate its approach with regards to which options to take forward, alongside other material planning considerations.

3.3 **Table 3.1** overleaf shows how preparation of the SA reports (which included the Environmental Report requirements set out in the SEA Regulations) corresponded with each stage of the Local Plan's preparation, and how the SA was taken into account. As described in **Chapter 2**, the early stages of Local Plan preparation (and therefore the SA) related to the Site Allocations DPD and Development Management Plan which were originally being prepared to sit alongside the adopted Core Strategy as part of the LDF, before being combined into a comprehensive new Local Plan.

Table 3.1: Iterations of the North Warwickshire Local Plan and Accompanying SA Outputs

Local Plan Consultation Stage and Documents	SA Documents	How SA was taken into account
Development Management Plan: Issues and Options (May 2012).	N/A	At this stage the consultation document did not set out clear alternative options for the Development Management Plan policies; rather it focussed on the broad approach to how the options would be developed. Therefore, no SA work was undertaken in relation to the development management policies at this stage.
Site Allocations DPD: Preferred Options, including some Issues and Options (February 2013).	SA Report for the Site Allocations DPD Preferred Options (March 2013).	The initial set of reasonable alternative site options were subject to SA with the findings being presented in the SA Report for the Draft Site Allocations Plan, published in March 2013.
Site Allocations DPD: Draft Pre-Submission version (June 2014).	SA Report for the Draft Pre-Submission Site Allocations DPD (June 2014).	Following the consultation on the Draft Site Allocations DPD and the SA Report, NWBC produced the Draft Pre-Submission version of the Site Allocations DPD, which was again subject to SA by LUC working in conjunction with NWBC, and the findings were set out in the June 2014 SA Report. That report provided information about the Council's choices for site allocations in each of the towns and villages, which were informed by the responses received during the consultation on the Draft Site Allocations Plan, the SA findings and other factors such as the availability and deliverability of particular sites. New site options that had come forward since the consultation on the Draft Site Allocations DPD were subject to SA and the findings were presented in the June 2014 SA report. The SA report was published for consultation alongside the Pre- Submission Site Allocations DPD during summer 2014.
Development Management Plan: Draft Policies (October 2015).	SA Report for the Development Management Plan Draft Policies (September 2015).	Reasonable alternative options for policies in the Draft Development Management Plan were identified by NWBC with input from LUC. The reasonable alternative 'no policy' options were subject to SA along with the policies that were taken forward as Draft Policies in the consultation document. Draft versions of the SA matrices for the policy options were sent to the NWBC officers preparing the Development Management Plan, prior to the Draft Policies document being finalised for consultation. In this way, the Council took into account the findings of the SA as well as other relevant factors when deciding which policy options to select and take forward as preferred approaches in the Development Management Plan: Draft Policies consultation document. This also provided an opportunity for

Local Plan Consultation Stage and Documents	SA Documents	How SA was taken into account
		<p>the Council to take into account a small number of recommendations that were made in the draft SA report as the Draft Policies were finalised for consultation.</p>
<p>Draft Local Plan (November 2016 – March 2017).</p>	<p>SA summary document for the Growth Options (June 2016). SA Report for the Draft Local Plan (February 2017).</p>	<p>Strategic policies relating to the amount and distribution of development that should take place in North Warwickshire were previously set out in the adopted Core Strategy. Prior to the preparation of the Draft Local Plan, during summer 2016 LUC was commissioned by NWBC to undertake SA work in relation to the Growth Options Paper that was prepared by NWBC to support the emerging Local Plan. The Growth Options Paper considered the issues and challenges associated with providing for additional housing (and potentially employment land) over and above the level set out in the Core Strategy, in order to respond to unmet need from neighbouring Tamworth Borough. It identified alternative options for how the required growth could be delivered – five options were presented for delivering the growth required within the Borough, and five for dealing with the growth required from outside of the Borough.</p> <p>An SA summary document was prepared by LUC to present the findings of the appraisal of the ten growth options. This was provided to NWBC in June 2016 so that the work could be taken into account to inform the preparation of the Draft Local Plan.</p> <p>The Draft Local Plan built on the work undertaken previously on the Site Allocations DPD and the Development Management Plan, as well as the further work on strategic growth options for the Borough. It comprised a full draft version of the Local Plan, setting out proposed policies and site allocations. LUC prepared the SA Report for the Draft Local Plan in conjunction with NWBC officers and the SA Report was published alongside the plan during the consultation period.</p>
<p>Draft Submission Local Plan (December 2017 – March 2018).</p>	<p>SA Report for the Draft Submission (Regulation 19) Local Plan (December 2017).</p>	<p>The December 2017 SA Report for the Draft Submission (Regulation 19) Local Plan built on the previous SA Report for the Draft Local Plan, now appraising the current version of the Local Plan policies and site allocations. The SA findings for the Draft Local Plan, along with other factors, contributed to the Council's decision making regarding which</p>

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Local Plan Consultation Stage and Documents	SA Documents	How SA was taken into account
		policies and site allocations were included in the Draft Submission Local Plan.
Submission to the Secretary of State.	Regulation 19 SA Report Submitted with the Local Plan in March 2018.	No new SA work was carried out at this stage.
<p>Examination March 2018-September 2021. Schedule of Proposed Main Modifications to the North Warwickshire Local Plan (March 2021).</p>	<p>North Warwickshire Local Plan Additional SA – Growth Alternatives (February 2019). SA Addendum Report for the Main Modifications (February 2021).</p>	<p>In December 2018, the Inspector examining the North Warwickshire Local Plan issued a progress note to NWBC, requesting that additional SA work be undertaken to assist the examination process. LUC carried out this work on behalf of NWBC and presented it in a supplementary SA note which considered and compared the likely effects of three alternative housing growth options (high, medium and low). The SA note was submitted to the Inspector and helped inform discussions at the examination hearings held in April 2019.</p> <p>Following further examination hearings in December 2020, NWBC prepared a schedule of Main Modifications to the submitted Local Plan. The Main Modifications were subject to SA by LUC and the findings were presented in an SA Addendum Report (February 2021). The SA Addendum Report concluded that the proposed Main Modifications did not significantly affect the SA findings that were reported previously at the Regulation 19 stage and in general they reinforced positive effects identified previously or provided additional mitigation relating to negative effects identified previously.</p> <p>In light of these overall findings and the existing recommendations made through the course of the SA and the wider plan-making process, no further SA recommendations were considered necessary.</p>
Adopted North Warwickshire Local Plan (September 2021).	SEA Adoption Statement (September 2021).	<p>This Adoption Statement summarises the SA/SEA process and how this has influenced the preparation of the North Warwickshire Local Plan.</p> <p>Following consultation on the Main Modifications and the associated SA Addendum Report, the Inspector's Report concluded that, with the inclusion of the recommended modifications, the Local Plan satisfies the requirements of Section 20 (5) of the Planning and Compulsory Purchase Act 2004 and meets the criteria for soundness in the National Planning</p>

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Local Plan Consultation Stage and Documents	SA Documents	How SA was taken into account
		Policy Framework. No further SA work was required following the publication of this report.

Chapter 4

How opinions of consultation bodies and the public have been taken into account

4.1 At each stage of the North Warwickshire Local Plan's development, an SA Report was published alongside the Local Plan document for consultation with the public and the consultation bodies specifically referred to in the SEA Regulations (i.e. Historic England, the Environment Agency and Natural England). The SEA Regulations require that the SEA Adoption Statement provides an account of how any opinions expressed by the public and the consultation bodies have been taken into account.

4.2 The Local Plan consultation stages and responses received relating to the SA documents are summarised below.

SA Scoping Report for the Local Development Framework (October 2006)

4.3 The SA Scoping Report was subject to consultation in late 2006, including formal consultation with the SEA statutory bodies at the time (English Heritage (now Historic England), the Environment Agency and Natural England). This provided an opportunity for consultees to comment on the proposed scope of the SA, including whether the objectives in the SA framework provided a reasonable framework for assessing the likely significant effects of the LDF and whether the review of relevant plans, policies and programmes (the 'PPP' review) and baseline information were appropriate and complete.

4.4 Comments received on the SA scoping were taken into consideration by NWBC and addressed in later SA documents as relevant. For example, some additional documents were included in the review of plans, policies and programmes and further sources of baseline information were taken into account.

4.5 Although the SA Scoping Report was produced early on in the LDF preparation process and therefore some years before the later stages of the SA for the Local Plan were carried out, the Scoping work including the baseline information, review of relevant plans, policies and programmes and key sustainability issues was regularly updated and consulted on as part of the later SA documents.

SA Report for the Site Allocations DPD Preferred Options (February 2013)

4.6 The SA Report for the Site Allocations DPD Preferred Options was published alongside the DPD for consultation in Spring 2013. The comments received were taken into account by NWBC as it prepared the next iteration of the DPD, the Draft Pre-Submission version.

4.7 The responses received were summarised in Appendix 3 in the SA Report for the Draft Pre-Submission Site Allocations DPD (June 2014). Comments received from English Heritage (now Historic England) resulted in some changes being made to the assumptions that were applied in the SA to identify the likely effects of the development site options on the SA objective relating to cultural heritage. Other comments related to queries regarding the particular sites that had been included in the SA report, and the likely effects identified in the SA. Queries were checked against the assumptions that were used to inform the appraisal of site options, to ensure that the information presented in the SA was factually correct and consistent.

SA Report for the Draft Pre-Submission Site Allocations DPD (June 2014)

4.8 The SA Report for the Draft Pre-Submission Site Allocations DPD was published alongside the draft DPD during the consultation period from June 2014. The comments received during this consultation were taken into consideration by NWBC and informed the preparation of the Draft Local Plan, once the decision had been made to incorporate the emerging site allocations into a comprehensive new Local Plan.

4.9 The consultation responses received were summarised in Appendix 1 in the SA Report for the Draft Local Plan (February 2017) and were again presented in Appendix 1 in the SA Report for the Draft Submission (Regulation 19) Local Plan in December 2017. A number of the comments received related to the likely effects of site options that had been identified in the SA, and some queried the fact that the SA did not at this stage take into account specific proposals relating to how each site might be developed (this approach was taken to ensure consistency). As previously, queries about the effects identified in the SA were checked against the assumptions that were used to inform the appraisal of site options, to ensure that the information presented in the SA was factually correct and consistent.

SA Report for the Development Management Plan Draft Policies (September 2015)

4.10 The SA Report for the Draft Development Management Plan Draft Policies was published alongside the draft plan during the consultation period from September 2015. The

comments received during this consultation were taken into consideration by NWBC and informed the preparation of the Draft Local Plan, once the decision had been made to incorporate the emerging development management policies into a comprehensive new Local Plan.

4.11 The consultation responses received were summarised in Appendix 1 in the SA Report for the Draft Local Plan (February 2017) and were again presented in Appendix 1 in the SA Report for the Draft Submission (Regulation 19) Local Plan in December 2017. Only a small number of comments were received and some related more to the content of the draft policies themselves, rather than the SA. Other comments queried some of the specific effects identified. Any such queries were checked against the assumptions that were used to inform the appraisal of site options, to ensure that the information presented in the SA was factually correct.

SA Report for the Draft Local Plan (February 2017)

4.12 The SA Report accompanied the Draft (Regulation 18) Local Plan for consultation from February 2017. Comments made during the consultation were taken into consideration by NWBC and LUC and informed the preparation of the Draft Submission (Regulation 19) Local Plan and the SA Report.

4.13 Consultation comments received in relation to the SA Report for the Draft (Regulation 18) Local Plan were detailed in Appendix 1 of the Regulation 19 SA Report (December 2017), along with a response to each. Many of the comments related more to the content of the Local Plan itself and only referred to the SA in the context of making wider comments about Local Plan policies. Comments were also received in relation to the evidence base used for the SA and the specific appraisal findings, particularly where consultees were promoting or opposing a certain location for development. As previously, such queries were checked to ensure that the information presented in the SA was factually correct and consistent.

SA Report for the Draft Submission (Regulation 19) Local Plan (December 2017)

4.14 The SA Report for the Draft Submission (Regulation 19) Local Plan (December 2017) accompanied the Local Plan for Regulation 19 consultation between December 2017 and March 2018. The consultation responses received in relation to the SA Report were summarised and responded to in Examination document CD1/6. Many of the consultation comments focussed on the appraisal of specific sites that had been selected or rejected for allocation, including a number of comments from site owners and promoters. Such queries were checked to ensure that the information presented in the SA was factually correct and consistent.

4.15 This SA report was submitted alongside the Local Plan for examination in March 2018.

North Warwickshire Local Plan Additional SA – Growth Alternatives (February 2019)

4.16 This additional SA document was prepared in response to the Inspector's request that additional SA work be undertaken to assist the examination process. LUC carried out this work on behalf of NWBC and presented it in a supplementary SA note which considered and compared the likely effects of three alternative housing growth options (high, medium and low).

4.17 The SA note was submitted to the Inspector and helped inform discussions at the examination hearings in April 2019. Representors had the opportunity to comment on its content and conclusions in their hearing statements.

Main Modifications SA Addendum Report (February 2021)

4.18 Following the examination hearings in December 2020, an SA Addendum Report (February 2021) was prepared and published for public consultation alongside the Council's schedule of Main Modifications between March and April 2021. The Main Modifications were subject to SA and the findings presented in the SA Addendum Report (no reasonable alternatives to the proposed modifications were identified for appraisal at this stage).

4.19 Consultation comments were received from various organisations, developers and members of the general public. Most comments were similar to those received during the consultation on the previous iterations of the SA, raising questions, support or criticisms of the judgements made in determining the effects of the Local Plan, its modifications, the reasonable alternatives and the evidence used to make them. The consultation comments received in relation to the Main Modifications were sent to the Inspector for consideration in preparing the Inspector's report.

Chapter 5

Why the adopted Local Plan was chosen in light of the other reasonable alternatives dealt with

5.1 NWBC considered a range of reasonable alternative options during the preparation of the Local Plan, particularly in relation to strategic policies addressing the scale and distribution of additional growth and options for development site allocations.

5.2 Information considered by NWBC before final decisions were made included:

- the SA findings, particularly the significant effects generated by each option;
- the Local Plan's vision and objectives;
- results of consultation and engagement with the general public and key stakeholders; and
- the evidence base for the Local Plan.

5.3 The options considered for the Local Plan are described below along with a summary of NWBC's reasons why the preferred options were selected over the reasonable alternatives. More detailed information about why individual options were selected or rejected can be found in the December 2017 SA Report that was submitted alongside the Local Plan.

Local Plan policies

5.4 Most of the policies that are set out in the Local Plan have been either brought forward from the adopted Core Strategy (and revised as necessary) or were developed through the preparation of the Draft Development Management Plan. A small number of entirely new policies have been introduced which did not previously appear in either of those documents but which the Council considered should be included in the Local Plan.

5.5 Appendix 4 in the December 2017 SA Report presents an audit trail showing how the policies set out in the submitted Local Plan relate to the policies previously included in the adopted Core Strategy and the Draft Development Management Plan. It also provided information about the Council's reasons for any changes made and for the new policies that had been introduced. The policies audit trail also highlighted where there were changes to the policies in the

Local Plan between the Draft and Draft Submission versions and explains the reasons for these changes.

Strategic policies

5.6 Strategic policies relating to the amount and distribution of development that should be delivered in North Warwickshire were previously set out in the adopted Core Strategy. Prior to the preparation of the Draft (Regulation 18) Local Plan, during summer 2016 LUC was commissioned by NWBC to undertake SA work in relation to the Growth Options Paper that was prepared by NWBC to support the emerging Local Plan. The Growth Options Paper considered the issues and challenges associated with providing for additional housing (and potentially employment land) over and above the level set out in the Core Strategy, in order to respond to unmet need from the neighbouring Tamworth Borough, the Coventry and Warwickshire Housing Market Area (HMA) and the Greater Birmingham and Black Country HMA.

5.7 The evidence of unmet need arising from the Birmingham Local Plan and HMA assessments affecting the Borough and a number of outstanding issues affecting the two emerging plans (the Site Allocations DPD and Development Management Plan) led to NWBC's decision to create a comprehensive new Local Plan for North Warwickshire. The first stage of work was the preparation of the Growth Options paper which sought to deal with the emerging growth requirements. It identified alternative options for how the required growth could be delivered – five alternative options were presented for delivering the growth required within the Borough, and five for dealing with the growth required from outside of the Borough.

5.8 An SA summary document was prepared by LUC to present the findings of the appraisal of the ten growth options. It was provided to NWBC in June 2016 so that the SA findings could be taken into account to inform the preparation of the Draft Local Plan. The Council chose to take forward a new pattern of growth which was based on a combination of a number of the growth options:

- IN1: Development in accordance with the Core Strategy settlement hierarchy.
- IN2: Development in and around the Main Settlements including Green Belt Market Town.
- OUT1: Development against the relevant borough, district or city boundary.
- OUT2: Develop in and around the closest settlements.
- OUT3: Add the housing to the overall North Warwickshire Borough figures and distribute according to the preferred option for the whole of the emerging draft Local Plan.

5.9 Table 4.4 in the December 2017 SA Report provided detailed information about why each of the ten options was either selected or rejected. In summary, the Council believed that, while some negative effects from these options (as well as those that were rejected) had been identified in the SA, these were outweighed by the advantages of the options in terms of delivering the required housing.

5.10 The amount of development to be delivered in North Warwickshire had previously been set out in the Core Strategy, which provided for the development of 3,150 new homes in the Borough between 2011 and 2029, as well as an additional 500 homes to provide for unmet housing need from Tamworth Borough. This resulted in a total annual housing requirement of 203 dwellings over the Plan period. This quantum of development was initially carried forward into the emerging Site Allocations DPD and the Development Management Plan, which would deliver the amount of development set out in the adopted Core Strategy. However, NWBC decided to combine the work on those emerging plans into one document – the new Local Plan for North Warwickshire, with the Growth Options Paper as the first stage for the Borough Council to consider the options for dealing with the emerging growth requirements.

5.11 However, following the work on the Growth Options Paper, and the firming up of the emerging housing requirements from outside the Borough through the drafting and formal signing of a number of Memorandums of Understanding to agree the distribution of housing amongst the local planning authorities involved, it was agreed that the new Local Plan would need to deliver at least 5,280 dwellings over the period 2011-2031, which equates to an annual requirement of 264 homes. This was a minimum figure which would provide for the needs of North Warwickshire Borough, plus an allowance for Tamworth Borough and redistribution from Coventry and Warwickshire. There were also emerging indications that the additional 3,790 homes would be required in North Warwickshire to provide additional housing to meet some of the unmet need from Birmingham City. This would therefore represent a significant increase in the housing requirements set out in the Core Strategy. A higher housing figure was therefore included in the submitted Local Plan along with sufficient site allocations within the Plan to accommodate that figure.

5.12 Following a request by the Inspector during the examination, in February 2019 LUC prepared a supplementary SA note which specifically considered alternative options for the amount of development to be delivered in North Warwickshire. The SA note considered and compared the likely effects of three alternative housing growth options which were prescribed by the Inspector:

- High (as per the submitted Local Plan): The highest of the three growth alternatives was the delivery of 9,598 homes over the plan period, rounded up in the Local Plan to 9,600 homes. Included in this figure were 3,104 new homes that had already been built in the first part of the plan period (1,069 homes), the remaining capacity on existing planning permissions as 1 April 2017 (1,135 dwellings), and an allowance for windfalls from 2018 to 2033 (900 homes). This left a balance of 6,496 homes, plus a 5% allowance to ensure flexibility, choice and competition in the market for land (325 homes), giving a total of 6,821 homes for which site allocations had been identified in the submitted Local Plan.
- Medium: The middle alternative would be the delivery of 7,963 dwellings on the basis of accommodating approximately 2,155 dwellings for Birmingham based on 2011 Census data related to the functional commuting relationship between the two areas. It would represent a 17% reduction in the total amount of housing to be delivered from that provided for in the submitted Local Plan.
- Low: The lowest of the three growth alternatives, being 5,808 dwellings over the plan period, represented the amount of growth required to meet North Warwickshire's needs, and to help meet the needs of Tamworth Borough and Coventry and Warwickshire. This growth alternative would not meet any of Birmingham's housing needs and represented nearly a 40% reduction in the total amount of housing to be delivered from that provided for in the submitted Local Plan.

5.13 It was concluded that the high growth alternative would result in the most significant positive effects against the primarily social and economic SA objectives and the most significant negative effects against the primarily environmental objectives. The low growth alternative would result in the opposite effects, performing least well against the social and economic SA objectives, but performing best against the environmental SA objectives. The middle growth alternative performs in-between the high and low growth alternatives. The SA concluded the difference in effects for the environmental SA objectives between the high and the middle growth alternatives were not that marked, and therefore the priority in sustainability terms should be to ensure that North Warwickshire's contribution to the unmet housing needs of Birmingham were fully achieved, where deliverable. The SA work did not indicate that a lower growth figure than that included in the submitted Local Plan was more appropriate and the quantum of growth in the adopted Local Plan continues to reflect the higher growth scenario.

Development Management policies

5.14 Prior to the preparation of the comprehensive new Local Plan from 2016, the development management-style policies were developed as part of the preparation of the Development Management Plan.

5.15 Reasonable alternative options for policies in the Draft Development Management Plan (consulted on between October and November 2015) were identified by NWBC with input from LUC. The policies in the Draft Development Management Plan were developed through internal discussion within the Planning Division at the Council, involving officers from both the Development Management and Forward Planning sections. The policy basis used to inform the new Development Management policies included the wording of the saved policies from the 2006 Local Plan, the Core Strategy and the wording of the NPPF. Reference was also made to particular planning applications which officers had handled, as well as recent appeal decisions, in order to explore locally-specific issues for North Warwickshire.

5.16 The main alternative approach considered was to rely wholly on a combination of the Core Strategy, the saved Local Plan policies and the NPPF, i.e. not to have development management policies at all. This approach was discounted on the basis of it being unclear, as it would involve cross referring between different documents, and there was potential for confusion about how much weight should be given to each document. The option of retaining any of the saved Local Plan policies was discounted unless there was an essential need and the content was still relevant and would accord with the Core Strategy and NPPF. Following a review of the Local Plan Saved Policies, NWBC officers were of the view that none of the saved Local Plan policy approaches were considered to be reasonable options. For all of the proposed policy approaches, the only reasonable alternatives identified were the 'no policy' option, i.e. to not include a policy in the Development Management Plan to address the issue in question and to instead rely on existing policy (in the NPPF and the adopted Core Strategy). NWBC officers were of the view that there were no other reasonable policy approaches, for example because alternative policy approaches would not be in conformity with the requirements of the NPPF or the established policy direction set out in the adopted Core Strategy. No additional alternative options were identified through the SA.

5.17 The Council also considered how to present the development management policies, including the option of having the policies organised by subject heading as in the 2006 Local Plan. This was discounted as there would be no clear link between the Development Management Plan and the Core Strategy. The option of having a development management policy to cover every eventuality or likely

proposal that might be submitted was also discounted. In order to provide clarity and to focus attention it was agreed that the development management policies should be seen to follow on from the Core Strategy policies. This ensured that they would have to add something to those Core Strategy policies, rather than just repeat them.

5.18 The reasonable alternative 'no policy' options were subject to SA along with the policies that were taken forward as Draft Policies in the consultation document. In all cases, the alternative options of not including policies in the Development Management Plan addressing the various issues were rejected by the Council. In most cases, as described in the Development Management Plan itself, not including additional policies in the Development Management Plan would mean there would be a lack of definition about how applications for certain types of development would be assessed. In some cases it was considered that there would be gaps in policy in the absence of a detailed Development Management Plan policy to support the Core Strategy.

5.19 Once the Council had decided to deliver a comprehensive new Local Plan and had prepared the Draft Local Plan, the development-management style policies in that document, along with the other policies, were subject to SA and the findings were presented in the February 2017 SA Report for the Draft Local Plan. Following the consultation period the Council made minor changes to the development management policies in the Local Plan as part of the preparation of the Draft Submission version.

Site Allocations

5.20 The first iteration of the Site Allocations DPD, the Draft version, was published in February 2013 and followed a long period of evidence gathering. An original list of site options for the Site Allocations DPD was identified through a variety of sources including:

- Sites previously and recently submitted to the Council.
- Sites proposed within other LDF documents such as the Strategic Housing Land Availability Assessment (SHLAA) and Local Investment Plan (LIP).
- A review of land allocations within the adopted North Warwickshire Local Plan.
- A review of site-specific proposals within other strategic documents and service strategies produced by other sections within the Council.

5.21 A number of the sites that were originally submitted to the Council were not considered to be reasonable options for various reasons (for example, sites that were located within the safeguarded area for HS2 or that did not adjoin village boundaries in rural areas); however the sites that could be

considered to be reasonable options were subject to SA. A number of sites that had planning permission at that stage were not subject to SA for that reason.

5.22 In some cases, the boundaries of sites that were put forward were amended (for example if a site was unnecessarily large taking into account local housing requirements, or because it would fit in with the surrounding built development better if it were reduced in size). The audit trail of site options in Appendix 8 of the December 2017 SA Report highlights where site boundaries were changed. In such cases, if the original site area could still be considered a reasonable option it was also subject to SA. Some sites were considered for more than one use (e.g. employment and residential development). Where this was the case, they were appraised for both potential uses.

5.23 The SA findings for this original set of site options were presented in the SA Report for the Draft Site Allocations DPD which was published in March 2013. Following the consultation on the Draft Site Allocations DPD and the SA Report the Council produced the Draft Pre-Submission version of the Site Allocations DPD, which was again subject to SA by LUC working in conjunction with NWBC, and the findings were set out in the June 2014 SA Report. That report provided information about the Council's choices for site allocations in each of the towns and villages, which were informed by the responses received during the consultation on the Draft Site Allocations Plan, the SA findings and other factors such as the availability and deliverability of particular sites. New site options that had come forward since the consultation on the Draft Site Allocations Plan were subject to SA and the findings were presented in the June 2014 SA report. The SA report was published for consultation alongside the Pre-Submission Site Allocations Plan during summer 2014.

5.24 Following the consultation on the Pre-Submission version of the Site Allocations DPD in 2014, a number of further new reasonable alternative site options were identified and subject to SA. Some of these were entirely new sites, while others were amended areas of sites that were appraised earlier in the SA process. In addition, a number of the sites appraised previously were no longer reasonable alternative options for allocation (for example because they had since been developed, because they were no longer available or have been found to be undeliverable). Those sites were therefore excluded from the SA process.

5.25 The SA findings along with other factors fed into the preparation of the Draft Local Plan, which included an updated set of proposed site allocations. Site allocations policies provided additional information about the proposals for each site and any mitigation that would be required. The audit trail of site options that was presented in Appendix 8 of the February 2017 SA Report for the Draft Local Plan showed

where changes to the list of site options had been made since the Pre-Submission version of the Site Allocations Plan.

5.26 NWBC then prepared the Draft Submission Local Plan which included a further updated set of site allocations. Further changes had again been made to the list of reasonable site options, on the basis of updated information about factors such as site availability.

5.27 Appendix 8 in the December 2017 SA Report presents an audit trail of the site options that have been considered at each stage of the Plan preparation process, including as part of the now-superseded Site Allocations Plan and during the preparation of the new Local Plan. The Council's reasons for including each site or not in the Local Plan are provided along with information about any changes that have been made to the boundaries of site options at each stage. Where sites that were previously considered are no longer reasonable options for allocation, this is explained in the audit trail.

Chapter 6

How the significant environmental effects of the implementation of the Local Plan will be monitored

6.1 The SEA Regulations require that *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”* (Regulation 17), and that the Environmental Report should provide information on *“a description of the measures envisaged concerning monitoring”* (Schedule 2).

6.2 The Planning Practice Guidance (PPG) on SA states that it is not necessary to monitor everything and monitoring should be focused on the significant sustainability effects, including significant effects where there is uncertainty and where monitoring would enable preventative or mitigation measures to be taken. Therefore, monitoring measures have been proposed in relation to all of the SA objectives in the SA framework for which likely (or uncertain) significant positive or negative effects have been identified from the Local Plan. This is the case for all of the SA objectives except 2 (Vibrant Communities), 5 (Crime), 14 (Natural Resources) and 17 (Local Sourcing).

6.3 **Table 6.1** shows the indicators to be used by NWBC to monitor the potential sustainability effects of implementing the Local Plan.

Table 6.1: Proposed Monitoring Framework for the North Warwickshire Local Plan

SA objectives for which likely (or uncertain) significant positive or negative effects have been identified for the Local Plan	Indicators
1. Equal access to services, facilities and opportunities for all, regardless of income, age, health, disability, culture or ethnic origin.	<ul style="list-style-type: none"> ■ Amount of new residential development within 30 minutes public transport time of GP, hospital, primary school, secondary school, area of employment, major retail centre. ■ Amount of completed local services including retail, office, and leisure development in Town Centre and the in the wider Borough. ■ % of households in North Warwickshire Borough that are within 4km of a bank/building society.
3. Tackling health inequalities and improve health by supporting local communities and by improving access and raising awareness.	<ul style="list-style-type: none"> ■ Life expectancy. ■ Proportion of the population aged over 85. ■ % of people classifying themselves as having good health. ■ Obesity rates. ■ Amount of new residential development within 30 minutes public transport time of GP and hospital.
4. Providing decent and affordable housing to meet local needs.	<ul style="list-style-type: none"> ■ Net additional gypsy and traveller pitches. ■ Number of people on social housing waiting lists. ■ Number and tenure type of existing housing stock. ■ Gross affordable housing completions. ■ % of Housing meeting Building for Life Assessment.
6. Providing opportunities to participate in recreational and cultural activities.	<ul style="list-style-type: none"> ■ Amount of eligible Open Spaces Managed to Green Flag Award Standards. ■ Amount of completed leisure developments. ■ Amount of new residential development within 30 minutes public transport time of recreational and cultural facilities (including pubs, shops, community facilities, open/greenspaces, playing fields and footpaths and cycle routes). ■ Proportion of residents with access to natural greenspace within 400m of their home. ■ Hectares of accessible open space per 1000 population.

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SA objectives for which likely (or uncertain) significant positive or negative effects have been identified for the Local Plan	Indicators
	<ul style="list-style-type: none"> ■ Hectares of new publicly accessible green infrastructure created.
7. Valuing, enhancing and protecting the assets of the natural environment of North Warwickshire, including landscape character.	<ul style="list-style-type: none"> ■ Number of changes inconsistent and consistent with defined landscape character. ■ Proportion of new development built on previously developed land. ■ Number of planning applications refused due to inappropriate development in the Green Belt or within defined landscape character areas.
8. Valuing, enhancing and protecting the quality and distinctiveness of the built environment, including the cultural heritage.	<ul style="list-style-type: none"> ■ Additions and losses of cultural heritage designations in the Borough. ■ Number of designated assets identified as being 'at risk'.
9. Valuing, enhancing and protecting the biodiversity of North Warwickshire.	<ul style="list-style-type: none"> ■ Changes in areas and populations of biodiversity importance. ■ % of SSSIs in Favourable or Unfavourable Recovering condition. ■ Achievement of BAP targets. ■ Number of LDF documents or planning approvals leading to significant impacts on sites designated for nature conservation. ■ Number of planning approvals identified as having a likely impact on wildlife for which provisions for net gain have been negotiated. ■ Number of planning applications refused or withdrawn wholly or in part due to lack of consideration of biodiversity impacts or considered to have unacceptable biodiversity impacts.
10. Ensuring development makes efficient use of previously developed land, buildings and existing physical infrastructure in sustainable locations.	<ul style="list-style-type: none"> ■ % of new and converted dwellings on previously developed land. ■ % of employment completions on previously developed land. ■ % of housing completions in main towns and service centres. ■ % of housing development being built at densities of over 30 dwellings per hectare. ■ % of new housing/employment development on areas of Grades 1, 2 or 3a agricultural land.
11. Maintaining the resources of air, water and productive soil, minimising pollution levels.	<ul style="list-style-type: none"> ■ % of new housing/employment development on areas of Grades 1, 2 or 3a agricultural land. ■ Water stress in the Borough. ■ NO₂ levels.

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SA objectives for which likely (or uncertain) significant positive or negative effects have been identified for the Local Plan	Indicators
	<ul style="list-style-type: none"> ■ Chemical and biological quality of rivers and lakes. ■ CAMS river status (over licenced, water available etc.)
12. Minimising North Warwickshire's contribution to the causes of climate change whilst implementing a managed response to its unavoidable impacts.	<ul style="list-style-type: none"> ■ CO₂ emissions by source. ■ GWh of installed low/ zero carbon energy. ■ Renewable energy capacity installed by type. ■ Number of buildings built that meet the Code for Sustainable Homes Standards Level 4 or higher. ■ Number of planning permissions granted contrary to Environment Agency advice on flooding.
13. Reducing overall energy use through sustainable design, increasing energy efficiency and increasing the proportion of energy generated from renewable sources.	<ul style="list-style-type: none"> ■ Renewable energy capacity installed by type.
15. Increasing use of public transport, cycling and walking and reducing use of the private car.	<ul style="list-style-type: none"> ■ Car ownership levels within the Borough. ■ % of journeys to work by private car. ■ New cycle facilities. ■ Increases in frequency and use of public transport services. ■ Amount of new residential development within 30 minutes public transport time of GP, hospital, primary school, secondary school, area of employment, major retail centre. ■ Amount of new residential development within 30 minutes public transport time of recreational and cultural facilities (including pubs, shops, community facilities, open/greenspaces, playing fields and footpaths and cycle routes).
16. Encouraging and enabling waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream.	<ul style="list-style-type: none"> ■ % of household waste sent for re-use, recycling and compost. ■ % of Construction and demolition waste re-used.
18. Creation of a modern, healthy and diverse economy which is able to adapt to changes in the wider economy while remaining relevant to the needs of local people.	<ul style="list-style-type: none"> ■ Unemployment Rate. ■ Employment Rate. ■ Job-Seekers Allowance (JSA) claimant rate.

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SA objectives for which likely (or uncertain) significant positive or negative effects have been identified for the Local Plan	Indicators
	<ul style="list-style-type: none"> ■ Number of Employment Completions. ■ Amount of new Employment floorspace by type. ■ Employment land available by type. ■ Amount of completed floor space for 'town centre uses'. ■ Extent of coverage of areas enabled for superfast broadband services.
19. Maintaining and enhancing employment opportunities and reducing the disparities arising from unequal access to jobs.	<ul style="list-style-type: none"> ■ Business survival rates. ■ Job-Seekers Allowance (JSA) claimant rate by ward. ■ Indices of Employment Deprivation.
20. Ensuring that people of all ages are provided with the opportunity to obtain the skills, knowledge, confidence and understanding to achieve their full potential.	<ul style="list-style-type: none"> ■ The number of persons not in education, employment or training (NEETs). ■ % of pupils obtaining Level 2 or higher qualification. ■ % of North Warwickshire's residents employed in knowledge based occupations. ■ Indices of Education, Skills and Training Deprivation.

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