



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

# Sustainability Appraisal of the South Warwickshire Local Plan

## Volume 1 of 3: Non-Technical Summary of the Regulation 19 SA

LC-1421	Document Control Box
Client	Warwick District Council and Stratford-on-Avon District Council
Report title	Sustainability Appraisal of the South Warwickshire Local Plan – Volume 1 of 3: Regulation 19 SA Non-Technical Summary
Status	Working Draft
File name	LC-1421_Vol_1of3_Reg19_SA_South Warks_NTS_4_180526.docx
Date	May 2026
Author	ND, BT, EG
Reviewed	ND
Approved	ND

Front Cover: XXX

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# 1 Introduction

## The purpose of this report

- N1. This Non-Technical Summary (NTS) provides a summary of the Sustainability Appraisal (SA) undertaken in support of the Regulation 19 Publication Draft of the South Warwickshire Local Plan (SWLP). The Local Plan is being prepared jointly by Stratford-on-Avon District Council and Warwick District Council and will guide development across South Warwickshire to 2050.
- N2. The purpose of Sustainability Appraisal is to identify, describe and evaluate the likely significant environmental, social and economic effects of the emerging Local Plan and to ensure that sustainability considerations are integrated into plan-making and decision-making throughout preparation of the Plan. The SA also incorporates the requirements of Strategic Environmental Assessment (SEA) under the Environmental Assessment of Plans and Programmes Regulations.
- N3. This document summarises the main findings of the SA in accessible, non-technical language. It explains how the assessment process informed preparation of the SWLP, how alternatives were considered and refined and the likely significant effects associated with the proposed strategy, policies and site allocations.
- N4. This NTS document comprises **Volume 1** of the SA; it is accompanied by **Volume 2**: The Main SA Report and **Volume 3**: Appendices to the main SA Report.

## The South Warwickshire Local Plan

- N5. The SWLP establishes the long-term planning framework for South Warwickshire over the period to 2050. The Plan seeks to accommodate future housing and employment needs while responding positively to climate change, protecting environmental assets and supporting healthy and sustainable communities.
- N6. The emerging spatial strategy focuses growth on locations considered capable of supporting sustainable patterns of development and infrastructure delivery. The Plan prioritises the use of previously developed land where suitable opportunities exist, while recognising that strategic-scale greenfield growth will also be required in order to accommodate identified development needs across the plan period.
- N7. The SWLP therefore proposes a combination of strategic growth locations, new settlements, employment allocations and local growth opportunities supported by investment in infrastructure, sustainable transport, green and blue infrastructure and community facilities. Alongside this, the Plan includes a comprehensive suite of policies relating to climate change, biodiversity, design quality, transport, landscape, heritage and environmental protection.
- N8. The Vision for South Warwickshire 2050 seeks to create a flourishing, healthy and resilient area where people will want to live, work and visit, while responding positively to the climate emergency and supporting sustainable economic growth.

## Sustainability Appraisal and the Plan-Making Process

- N9. Sustainability Appraisal is an iterative process that has informed the preparation of the SWLP throughout its development. The SA has not been undertaken as a separate exercise after preparation of the Plan. Instead, the assessment process evolved alongside the emerging Local Plan and was used to inform the development and refinement of the preferred strategy, policies and site allocations.
- N10. The SA considered the likely effects of the Plan against a framework of 13 Sustainability Objectives covering climate change, flood risk, biodiversity and geodiversity, landscape, cultural heritage, pollution, natural resources, waste, housing, health, accessibility, education and the economy.
- N11. Assessment findings were used throughout the preparation of the Plan to help identify potential adverse effects, strengthen mitigation measures and improve sustainability performance. This included refinement of the spatial strategy, climate policies, biodiversity measures, infrastructure approaches and strategic growth proposals.
- N12. The SA process was informed by an extensive evidence base including technical studies, environmental information, infrastructure evidence, consultation responses and site assessment work. The assessment also considered cumulative effects and the likely interactions between different elements of the Plan.

## 2 Baseline Conditions and Sustainability Issues

- N13. South Warwickshire contains a rich and varied natural and historic environment, including valued landscapes, heritage assets, ecological networks and extensive areas of countryside. At the same time, the area faces significant challenges associated with climate change, housing affordability, infrastructure pressures and the need to support sustainable economic growth.
- N14. The SA identified a number of important sustainability issues which helped shape both the SA Framework and the emerging Local Plan. These included the need to reduce greenhouse gas emissions and improve climate resilience, address housing affordability pressures, support sustainable transport, protect biodiversity and landscape character, reduce flood risk and ensure that infrastructure is delivered alongside growth.
- N15. The assessment also identified ongoing pressures relating to the loss of greenfield land, impacts on natural resources, pressure on water infrastructure and the need to protect the distinctive environmental and historic character of South Warwickshire while accommodating substantial future growth requirements.

## 3 Reasonable Alternatives

N16. Consideration of reasonable alternatives forms a central part of the Sustainability Appraisal process and has informed preparation of the SWLP throughout its development.

N17. The SA considered a substantial range of alternatives relating to:

- housing and employment requirements;
- the overall spatial strategy including the scale and distribution of growth;
- potential new settlements;
- strategic growth locations;
- non-strategic housing and employment sites;

### Growth Options

N18. The assessment process evolved through successive stages of plan-making and refinement. At a strategic level, the SA considered two alternative housing and employment growth options, including different approaches to meeting identified needs across the plan period.

### Spatial Strategy Options

N19. At the strategic level, the SA assessed five alternative spatial strategy options relating to the distribution and pattern of growth across South Warwickshire. This was supported by assessment of alternative housing and employment growth options and a substantial range of site-based reasonable alternatives.

### Strategic Growth Locations

N20. A total of 24 Strategic Growth Locations (SGLs) were identified and appraised through the Regulation 18 Preferred Options stage. Through the plan-making process, these options were refined to reflect updated evidence, consultation responses and site assessment work. Nineteen SGLs were subsequently assessed as reasonable alternatives at the Regulation 19 stage.

### New Settlements

N21. The SA also assessed a series of potential New Settlement options. At the Regulation 18 Preferred Options stage, 12 reasonable alternative New Settlement options were identified and appraised. Through the iterative plan-making and assessment process, these were refined to five reasonable alternative New Settlement locations at the Regulation 19 stage.

### Non-Strategic Sites

N22. Alongside the strategic-scale options, the SA assessed 152 non-strategic sites, including residential, employment and Gypsy and Traveller sites, together with Local Green Space options.

- N23. The assessment process was iterative and evolved alongside preparation of the Local Plan. As evidence emerged and consultation responses were received, options were refined, mitigation measures strengthened and preferred approaches amended. Not all options assessed through the SA process were selected for inclusion within the preferred strategy. Assessment findings, alongside technical evidence, infrastructure considerations and consultation responses, informed the refinement of options and the identification of preferred allocations.

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## 4 The Preferred Spatial Strategy

- N24. The preferred spatial strategy seeks to direct growth towards locations capable of supporting sustainable development patterns while enabling infrastructure delivery and economic growth. The strategy prioritises the use of previously developed land within existing urban areas where suitable opportunities exist. However, evidence demonstrates that there is insufficient previously developed land capacity within South Warwickshire to accommodate identified development needs in full.
- N25. As a result, the Plan proposes a combination of strategic growth locations and new settlements alongside local growth opportunities and strategic employment allocations. The strategy places considerable emphasis on active travel, sustainable transport, green and blue infrastructure, climate resilience, biodiversity enhancement and design quality.
- N26. The strategy also seeks to support the delivery of infrastructure alongside growth, including education provision, transport infrastructure, community facilities, utilities, open space and green infrastructure networks.

# 5 Likely Significant Effects of the Plan

## Residual Effects

### N27. Likely residual positive sustainability effects of the SWLP:

Table E1: Positive Effects (Reproduced from Table 5.1 in Vol 2)

Summary of residual positive effects	
1	<p><b>Protection and enhancement of the ecological network</b></p> <p>Overall, the SWLP policies are likely to enhance habitat connectivity and strengthen the resilience of ecological and green infrastructure networks through biodiversity net gain, habitat creation and improved management. The Plan supports the expansion of green and blue infrastructure and aligns with the Local Nature Recovery Strategy, providing opportunities to improve connections between biodiversity features and support nature recovery. Overall, a long-term positive effect on ecological networks is anticipated.</p>
2	<p><b>Addressing flood risk</b></p> <p>Allocated sites have been assessed through the Sequential Test, with the Level 2 SFRA providing the evidence base to inform the application of the Exception Test where required. The SFRA sets out site-specific recommendations to ensure development is safe and consistent with national policy. Subject to the implementation of these recommendations, including site-specific Flood Risk Assessments and appropriate mitigation, no significant adverse effects from fluvial or surface water flooding are anticipated, and development is not expected to increase flood risk elsewhere.</p>
3	<p><b>Protection and enhancement of multi-functional green infrastructure</b></p> <p>While development will result in some loss of greenfield land at site level, SWLP policies seek to protect, enhance and deliver multi-functional green and blue infrastructure across the Plan area. This includes the integration of SuDS, habitat creation and green networks, supporting climate regulation, flood management and ecological resilience. Overall, a positive effect on climate change adaptation is anticipated.</p>
4	<p><b>Provision of public greenspace and active travel opportunities</b></p> <p>SWLP policies will support the provision and integration of accessible green space within new development, alongside the protection of existing assets, helping to improve opportunities for outdoor recreation and health and wellbeing. In addition, policies promote the delivery of connected pedestrian and cycle networks, enhancing accessibility and supporting active travel.</p> <p>While some sites currently have more limited access to existing greenspace and active travel networks, new provision and improved connectivity are expected to address these gaps over time. Overall, a positive effect is identified in the medium to long term.</p>
5	<p><b>Provision of new homes</b></p> <p>The SWLP proposes the delivery of 54,925 new homes, alongside provision for Gypsy and Traveller pitches, Travelling Showpeople plots and Boat Dweller moorings, to meet identified housing needs. Policies within the Plan set out requirements for an appropriate mix of housing types, sizes and tenures, including affordable and specialist housing, to support a range of community needs.</p> <p>Overall, a long-term positive effect on housing provision is anticipated.</p>
6	<p><b>Provision of employment opportunities</b></p> <p>The SWLP proposes the delivery of sufficient employment land to meet identified needs, including 225ha of strategic and 321ha of non-strategic provision. Policies within the Plan support a range of employment locations and site types, including mixed-use and rural areas, and protect existing employment land to meet the needs of different sectors.</p> <p>Overall, a long-term positive effect on employment provision is anticipated.</p>

**N28. Likely residual adverse sustainability effects of the SWLP:**

Table E2: Adverse Effects (Reproduced from Table 19.2 in Vol 2)

Summary of residual adverse effects	
<b>1</b>	<p><b>Increased generation of, and exposure to, air pollution</b></p> <p>Despite technological and infrastructure advancements, the scale of proposed housing and employment development within the Plan area is expected to increase traffic volumes and energy demand. As such, increased emissions of pollutants, particularly NO<sub>x</sub> and PM<sub>10</sub>, are likely and cannot be fully mitigated by SWLP policies alone. The transition to cleaner technologies is expected to improve air quality over time; however, a short-term cumulative adverse effect is identified.</p>
<b>2</b>	<p><b>Threats or pressures to biodiversity designations</b></p> <p>The SWLP policies provide a strong framework to protect designated sites and manage impacts through the mitigation hierarchy, with the HRA Appropriate Assessment concluding that adverse effects on the integrity of European sites can be avoided with mitigation. However, given the scale and distribution of development, adverse effects are unlikely to be fully mitigated in all cases. In particular, there remains potential for habitat loss or degradation where allocations coincide with or are adjacent to locally designated sites (LWSs and LNRs), with associated risks to their ecological value.</p> <p>Overall, a residual cumulative adverse effect on biodiversity designations is identified, particularly in the short to medium term, with localised significant effects possible.</p>
<b>3</b>	<p><b>Increased GHG emissions</b></p> <p>Although SWLP policies will help to reduce greenhouse gas emissions through energy efficiency, low carbon technologies and support for sustainable transport, these measures are unlikely to fully offset emissions associated with the scale of proposed growth, particularly from transport and embodied carbon. An overall increase in GHG emissions is therefore expected, resulting in a minor to moderate adverse effect in the medium to long term, with potential for effects to reduce over time as decarbonisation progresses.</p>
<b>4</b>	<p><b>Alteration of character or setting of heritage assets and historic landscapes</b></p> <p>SWLP policies provide a strong framework to conserve and enhance heritage assets and their settings through design-led approaches, masterplanning and mitigation. However, given the proximity of a number of allocations to designated and non-designated heritage assets, and the presence of areas of higher sensitivity, adverse effects are possible and unlikely to be fully mitigated in all cases. In addition, there is uncertainty regarding the presence and significance of below-ground archaeological remains in the absence of detailed investigation.</p> <p>Overall, a minor to moderate adverse effect is identified in the long term, with a degree of uncertainty and potential for localised significant effects.</p>
<b>5</b>	<p><b>Sustainable access to healthcare and leisure facilities</b></p> <p>SWLP policies will support improved access to healthcare and leisure facilities through new provision, developer contributions and enhanced sustainable transport. However, many allocated sites are located beyond sustainable distances to existing facilities, and these accessibility constraints are unlikely to be fully mitigated, particularly in the short term.</p> <p>Overall, a minor adverse effect is identified in the short to long term, with some improvement over time as infrastructure is delivered.</p>
<b>6</b>	<p><b>Alteration of landscape character and sensitive / locally distinctive landscapes</b></p> <p>SWLP policies provide a strong framework to protect landscape character, designated landscapes and key views through landscape-led design, green infrastructure and the retention of settlement identity. However, given the scale and distribution of development, particularly on previously undeveloped land and within areas of moderate sensitivity, these measures are unlikely to fully mitigate all impacts. There remains potential for adverse effects on the setting of the Cotswolds National Landscape, local landscape character, views from PRowS, and increased risk of settlement coalescence.</p> <p>Overall, a minor to moderate adverse effect is identified in the long term, with potential for cumulative and localised significant effects in more sensitive areas.</p>

<b>Summary of residual adverse effects</b>	
<b>7</b>	<p><b>Sustainable access to services and facilities</b></p> <p>SWLP policies will support the delivery of new and enhanced community infrastructure, including schools, healthcare and local services, alongside improvements in sustainable transport and connectivity. However, some allocated sites are located beyond sustainable distances to key services and public transport, and these accessibility constraints are unlikely to be fully mitigated.</p> <p>Overall, a minor adverse effect is identified in the short to long term, with some improvement over time as infrastructure is delivered.</p>
<b>8</b>	<p><b>Waste generation</b></p> <p>The proposed development of 54,925 homes and associated employment floorspace will increase waste generation, placing additional pressure on waste management infrastructure. While SWLP policies and the Warwickshire Waste Core Strategy support recycling, recovery and the provision of waste infrastructure, these measures are unlikely to fully offset the effects of increased waste generation, particularly at larger strategic sites.</p> <p>Overall, a minor adverse effect is identified in the short to medium term, with some uncertainty over longer-term effects.</p>
<b>9</b>	<p><b>Loss of soil resources</b></p> <p>The proposed allocations will result in the cumulative loss of previously undeveloped land and soil resources, much of which is currently in agricultural use and may include Best and Most Versatile (BMV) land. This has the potential to increase surface water runoff, reduce biodiversity, and contribute to soil erosion, with implications for air quality and agricultural productivity. While policies seek to protect soils and prioritise previously developed land, these effects are unlikely to be fully mitigated.</p> <p>Overall, a long-term and permanent significant adverse effect is identified.</p>
<b>10</b>	<p><b>Reduction in water quality and increased demand on water resources</b></p> <p>The proposed development will increase demand for water resources and place additional pressure on wastewater infrastructure, as well as increasing the risk of water quality deterioration from surface runoff and sewage discharges. While SWLP policies, regulatory controls and water company investment are expected to mitigate many impacts, evidence indicates that some wastewater treatment works are already operating close to capacity, with uncertainty regarding the timely delivery of required upgrades. There also remains potential for localised deterioration in water quality (e.g. ammonia concentrations), despite compliance with WFD standards.</p> <p>Overall, a long-term adverse effect is identified, subject to the timely provision of infrastructure and mitigation measures.</p>

N29. The SA identifies a range of likely significant positive and adverse effects associated with the SWLP. Overall, the assessment concludes that the Plan is likely to generate substantial social and economic benefits while also resulting in some significant residual environmental effects associated with strategic-scale growth.

N30. Significant positive effects are identified in relation to housing provision through the delivery of new homes, including affordable housing, specialist accommodation and provision for Gypsy and Traveller communities. Major positive economic effects are also identified through employment land provision, support for investment, support for town centres and expansion of the green economy.

N31. The assessment identifies particularly strong positive effects in relation to climate change. The Plan includes extensive policy measures relating to operational net zero, renewable and low carbon energy, energy efficiency, climate resilient design and sustainable transport.

N32. The Plan also performs strongly in relation to biodiversity and green infrastructure through policies supporting biodiversity net gain, habitat protection, ecological networks, trees,

woodland and green and blue infrastructure provision. Positive effects are also identified in relation to health and wellbeing through improved opportunities for walking and cycling, provision of open space and recreation, healthier place-making principles and improved accessibility to services and facilities.

- N33. Despite embedded mitigation and environmental safeguards, the SA identifies a number of likely residual adverse effects associated with the scale of development proposed. Strategic-scale greenfield growth is likely to result in permanent changes to parts of the landscape and countryside. In some locations, development may alter the character of rural areas and result in the loss of undeveloped land. Some of these effects are likely to be irreversible.
- N34. The assessment also identifies likely adverse effects relating to the loss of natural resources, including Best and Most Versatile agricultural land in some locations. Potential adverse effects relating to biodiversity, flood risk and cultural heritage vary depending on the location and characteristics of individual sites. While the Plan includes substantial mitigation measures and environmental safeguards, some residual adverse effects and uncertainties may remain.
- N35. The construction and operation of new development may also increase noise, air pollution, light pollution and traffic pressures in some locations, although these effects are expected to be reduced through mitigation and development management processes.

### **Cumulative Effects Assessment**

- N36. The assessment identifies potential positive cumulative effects associated with housing delivery, employment growth, infrastructure provision, climate mitigation and biodiversity enhancement. Potential adverse cumulative effects are also identified, particularly in relation to landscape change, loss of greenfield land, pressure on natural resources and the combined effects of strategic-scale growth.

### **Mitigation and Monitoring**

- N37. The SA process included both pre-mitigation and post-mitigation assessment stages. The pre-mitigation assessment identified the likely impacts associated with reasonable alternative sites prior to consideration of Local Plan policy mitigation. The post-mitigation assessment then considered how emerging SWLP policies and other mitigation measures could help avoid, reduce or offset identified adverse effects.
- N38. The SWLP includes a wide range of mitigation measures intended to reduce adverse effects and improve sustainability outcomes. These include biodiversity net gain requirements, green infrastructure provision, sustainable drainage measures, flood risk mitigation, sustainable transport measures, climate resilience policies, landscape and heritage protection measures and infrastructure delivery requirements.
- N39. The SA identifies that some sites and options will require greater levels of mitigation and intervention than others in order to achieve acceptable sustainability outcomes. This formed part of the wider evidence base used to inform the selection and refinement of preferred options throughout the plan-making process.

- N40. The SA Report identifies a series of proposed monitoring measures and indicators relating to the likely significant effects of the SWLP. These are intended to support ongoing consideration of the environmental, social and economic effects associated with implementation of the Plan

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## 6 Conclusions

- N41. The SA concludes that the SWLP provides a comprehensive framework for accommodating future growth across South Warwickshire while seeking to balance environmental, social and economic considerations.
- N42. The Plan is expected to generate substantial positive effects through the delivery of homes and employment opportunities, support for sustainable transport, climate mitigation and adaptation measures, biodiversity enhancement, infrastructure provision and healthier communities.
- N43. The Plan also includes a strong framework of environmental protection and mitigation policies. However, the scale of development proposed means that some significant residual adverse effects are likely to remain, particularly in relation to landscape change, loss of greenfield land, impacts on natural resources and environmental effects associated with strategic-scale growth.
- N44. Overall, the SA concludes that the SWLP represents a balanced and sustainability-led approach to meeting South Warwickshire’s future development needs to 2050.