

RESPONSE TO SUSTAINABILITY APPRAISAL (NOVEMBER 2022)

Spitfire Homes (“**Spitfire**”) have the following comments to make in respect of the Sustainability Appraisal (“**SA**”) prepared to support the South Warwickshire Local Plan (“**SWLP**”) Issues and Options Consultation draft document.

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

The SA testing of Growth Options against the 13 criteria identified in paragraph 2.21 of the report is appropriate. These criteria reflect the objectives of the SWLP and the topics identified in Annex 1(f) of the SEA directives. The outcomes of the assessment process, however, needs to be treated with caution.

The SA is a snapshot in time. It assesses the sustainability of the Growth Options and potential locations for allocations on the basis of the current services and facilities that are available and on existing constraints. For example, when assessing the Draft Plan policies, growth options and 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 a new education infrastructure, such as new schools or the contributions that can be made to improve existing facilities.

It is appreciated that this is a difficult 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

While the assessment of the proposals against climate change objectives is required, there are concerns with the way in which this has been applied in the SA.

It is advised at paragraph 2.4.6 of the SA that the Broad Locations (2,000+ houses) and New Settlements (6,000+ houses), are likely to increase greenhouse gas emissions in the plan area by more than 1% and adversely affect climate change in the future. Developments of between 50 to 500 dwellings could increase carbon emissions in the plan area by more than 0.1% and have a lesser effect on climate change. As a consequence, it is effectively concludes that larger schemes are likely to result in a greater amount of greenhouse gas emissions than smaller development proposals.

This is misleading as it the total number of houses that is relevant and not the number or size of the developments.

The SWLP will have a set housing requirement. That housing requirement will be delivered through various residential developments of different sizes. The greenhouse gas emissions from the construction operation of these properties will have a total accumulative effect based on the total number of houses built. This significance will be broadly the same, regardless of whether the houses are delivered through a larger number of small sites or a smaller number of large sites.

The SWLP should consider the most appropriate way of delivering the houses in order to try to reduce greenhouse gas emissions because although larger developments may have relatively bigger higher emissions of greenhouse gases the amount emitted to deliver all the housing need will remain unchanged..

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 can often be used to address localised problems associated with flood risk. It is inappropriate for it to be immediately assumed that the development of greenfield sites can have adverse effects on flooding, drought and storm events.

Biodiversity and Geodiversity

The impact of development on biodiversity and geodiversity is a clear consideration in the SA process. However, the SA advises that no detailed ecological surveys have been

completed at this stage to inform the assessments in this 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.

That being the case, the conclusions reached regarding the ecological sensitivity of development option needs to be treated with considerable caution. If more detailed site specific ecological information 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 is uncertain.

Furthermore, it is recognised and recommended that landscape sensitivity and capacity studies would be helpful later in the plan making process once Preferred Options have been identified. Consequently, the landscape appraisal selection of the SA should be treated with caution as the evidence base is not complete.

Cultural Heritage

It is advised at paragraph 2.8.3 of the SA that 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 must, therefore, be treated with caution. Where site specific heritage information has been provided with our Call for Sites submission, this should be considered in the site selection process.

Environmental Pollution

There is concern about 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. In addition, it is suggested within the SA that schemes within 200 metres of a major road may have adverse sustainability impacts due to road related air and noise emissions. These conclusions do not automatically follow as it is possible for sites within the metres of railway lines and main roads to achieve suitable noise and environmental air quality standards. This assessment criteria should be reconsidered.

Natural Resources

We are concerned with the SA approach 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 while 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.

This is misleading as it the total number of houses that is relevant and not the number or size of the developments.

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.

Health Impact

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 advises that sites that are more than 400 metres from a bus stop and sites that are 800 metres from

the food store will receive a negative rating. 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 these larger schemes to include a local centre. As a consequence, the assessment criteria must be treated with caution as part of the site selection process.

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. Indeed, we would expect 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 scores sites that are within 5km of a key employment location. Large scale residential sites are, in all likelihood, likely to provide employment opportunities as part of the overall proposals. It is, therefore, inappropriate to penalise such sites in the SA when employment land accessibility will be rectified by onsite provision.

Initial Identification of Settlements

The 30 settlements identified in paragraph 3.5.2 of the report are a combination of the main settlements, that expect to be able to deliver up to 2,000 homes, as well as smaller locations that might be able to deliver between 50 and 500 homes. We suggest that it would be prudent to also include the new settlement at Long Marston within the list of the settlements to be assessed as it is intended to deliver a significant amount of development and will include new services and facilities that will help sustain new development going forward. This matter should be re-considered.