

External Memo: **technical advice note**

To	Jo Bozdoganli, Stratford-on-Avon DC
From	Neil Davidson, Lepus Consulting
Subject	Responses to climate change queries from Cllr John Dearing (Warwick DC)
Code	LC-813 SA of the South Warwickshire Local Plan (R18 Part 1)
Date	14 th December 2022
CC	Phil Clarke, Warwick DC



Summary

This technical note has been prepared to provide answers to four questions raised by Cllr John Dearing during the scrutiny and committee approval process for the South Warwickshire Issues and Options paper.

The queries are very welcome and helpful. If further detail is required, Lepus can supply further information or meet Cllr Dearing if it would help.

Question 1

Q.1 It may be challenging to identify quantitative Indicators for all the SA Objectives, why are some Indicators statements of intention or policy rather than factual information? For example, SA1 Climate Change is described through six Decision-making criteria that include the question: “Will the option ensure that sustainable construction principles are integrated into developments including energy efficient building design?” To which, one of the Indicators is listed as “Implementation of adaptive techniques in building design e.g. passive heating/cooling”. This criterion and indicator can’t be addressed in 2022-24 as they depend on future policy. Or, the Decision-making criterion question “Will the option help to reduce reliance on personal car use? Indicator - Encourage active travel to local services and amenities.” This is not an indicator that can be used to judge the performance of an objective for a location now as it represents a future intention or action. Some questions are unclear. For example, SA13 Economy, one of the Decision-making criterion questions is “Will the option provide or improve sustainable access to a range of employment opportunities? What does this mean, how could it be answered on the basis of locations for housing alone, and what is the appropriate Indicator?”

1. The legal requirement is to undertake an assessment process such that it is possible to understand if there is likely to be a significant effect (LSE) on the topic in question. The SA Framework is a mechanism devised to assist with that process; it has no legal basis. The scoring symbols (Table 2.1, p10, Main Report) provide an at-a-glance visual guide to performance, which alongside the decision making questions and the indicators (SA Framework, Appendix A) all serve to help provide an evaluation of significance. Since the assessment is strategic, there are limitations as to how diagnostic a particular evaluation can be. All limitations are cited in Chapter 2 of the SA Report.
2. It is also worth noting that the SA Framework is designed to be able to evaluate all aspects of the plan. It is used for the whole SA process, to assess every element of the plan. For example, some of the indicators/criteria will apply more to policy options than the broad locations and so forth, but they are still valid to include in the framework.
3. In all cases, any element of the issues and options paper which has been evaluated by the SA report will include an assessment narrative and a confirmation about whether or not the identified effect can be considered to be significant or not. The six scoring values used to provide a quick guide to the assessment findings are indicative. Only the narrative provides the conclusion as to LSE.
4. The SA process is already unduly long and the narrative evaluation does not include a systematic answer by answer response to every decision making question in the SA Framework. It would

simply take too long. The questions are there to help guide the assessment. The assessment findings are presented in the narrative that accompanies evaluation of the plan component be that a site or a policy.

5. Assessment of climate change impacts is limited to per capita evaluation at the moment. There is a separate climate change study which will be used to inform the next round of plan making and SA.
6. We have had very limited employment information so far at the site level (either new settlement, broad location or small settlements) in order to evaluate economic impacts in any detail. More is likely to come at the next stage of plan making.

Q.2 How are the Explanations arrived at? We might expect to see these based on answers to the Decision-making criteria using the stated Indicators but this is far from clear. For Kenilworth North, the Explanation for the scoring of SA1 Climate (SA vol 3. B.5.1 page 565 pdf p.607) only uses one (carbon emissions) of the stated Indicators, as in “Large scale residential led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.” Why are the other stated Indicators not included, like the possibility for green infrastructure? In any case the idea that all houses cause an increase in district GHG emissions depends on whether you mean operational, embedded etc and seems to contradict one of the Indicators that suggests future houses (up to 2050) are likely be low energy/zero carbon in use. For this Indicator, estimated carbon emissions per property would perhaps be a more useful Indicator? I can see no information as to how the Impact Symbols/scores were determined for a particular location once the Decision making criteria were answered, which suggests it was mainly through expert judgement. If true, who were the experts?

7. See answer to Q1.
8. All explanation of scoring symbols for climate change is presented in section 2.4 of the Main Report.
9. The suggestion of being able to evaluate “estimated carbon emissions per property would perhaps be a more useful Indicator?” is very welcome. It is not within the project scope of the SA to collect information on the carbon emissions impact of every dwelling; a change to scope would be associated with a substantial time-consuming and expensive exercise in data collection. Climate Change related evidence is being prepared to support the local plan by Arup. Team members

from Lepus and Arup have arranged an effective protocol for sharing information and working together as the plan making progresses. This dialogue will continue into the next stage of plan production when the latest results of the Climate Change evidence will be available for the SA team to factor into the sustainability appraisal of the emerging Local Plan.

Q.3 How are the Impact Symbols translated into SA Objective Performance scores on the rose diagrams? The rose diagrams are scored 0 to 5 which suggests they map on to the six impact symbols. But this is not the case. For example, SA1 Climate Change for Kenilworth North (SA vol 3. B.5.1 page 565 pdf p.607) is given an Impact Symbol of (- -) (most adverse effect) but is mapped on to a score of 1 in the rose diagram – not 0 (zero) (SA vol. 2, 4.5 page 458, pdf p 500).

10. The radar diagrams are principally seeking to express findings in a more user friendly way. Apologies for any confusion. The Radar graphs are produced in Excel. This requires a value in order to plot the graph. The 0-5 is simply a scale that was used to translate the SA scores into values: (major negative ‘- -’ = 1; minor negative ‘-’ = 2, negligible ‘0’ = 3, minor positive ‘+’ = 4, major positive ‘++’ = 5). The receptors within each SA Objective were each assigned their own scores. Scores were totalled and averaged to determine a single value for use in the radar charts. This helps to produce an overall, high level, picture of the findings and relative performance of each SA Objective.

Q.4 How are the Impact Symbols ‘averaged’ for a SA Objective on a rose diagram when there are sub objectives with different Impact Symbols? For example, SA6 Pollution for Kenilworth North (SA vol 3. B.5.6 page 568 pdf p.610) has five sub objectives all scored with the same Impact Symbol (-) yet the rose diagram score is 2.2. Or, SA3 Biodiversity (SA vol 3. B.5.3 page 566 pdf p.608) that has eight sub objectives (+/-, 0, 0, -, --, -, 0, -) and also with an average score 2.2 (a simple mapping of 0 to 5 to these would give an average score of $14/8 = 1.75$). Perhaps the different sub objectives are weighted differently, though this is not clearly stated, or there is an error in the mapping (see Q.3).

11. See answer to Q3 above.
12. There is no weighting of any receptor.