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Date: 6<sup>th</sup> July 2023

Dear Sir/Madam,

**Borough Plan Committee – 12<sup>th</sup> July 2023**

I refer to Item 6 'Borough Plan Review Update' on the Agenda for the Borough Plan Committee scheduled for Wednesday, 12 July 2023 and attach copy of Appendices D,E,F and O previously marked as 'To Follow'.

Yours faithfully,



BRENT DAVIS

Chief Executive

To: Members of the Borough Plan Committee

Councillors R. Smith (Chair), R. Baxter-Payne, L. Cvetkovic, J. Kennaugh,  
K. Kondakor, N. Phillips, J. Singh, R. Tromans and M. Walsh.

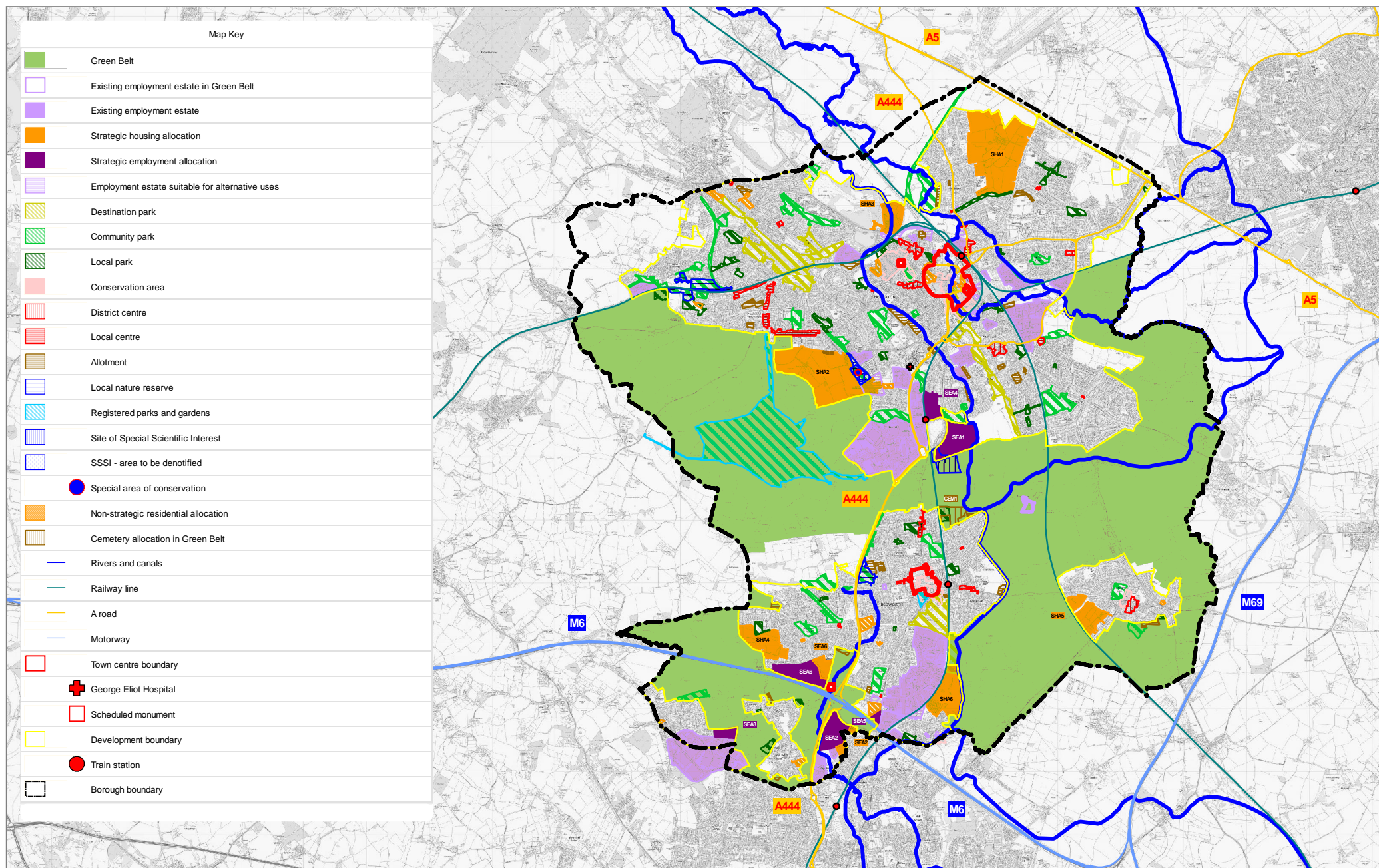
Borough Plan Committee - 12<sup>th</sup> July 2023

## **Appendix D**

### **Borough Plan Review**

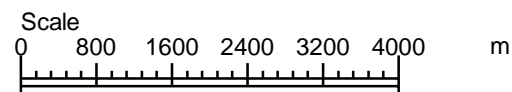
### **Draft Borough Plan Map**

# Draft Borough Plan Review Policies Map



For reference purposes only. No further copies may be made.

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Borough Plan Committee - 12<sup>th</sup> July 2023

## **Appendix E**

### **Borough Plan Review**

### **Draft Sustainable Appraisal**

# Nuneaton and Bedworth Borough Council Local Plan

## Sustainability Appraisal

SA Report  
Regulation 19

July 2023

## Quality information

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# 1. Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned by Nuneaton and Bedworth Borough Council to undertake a Sustainability Appraisal (SA) of the Borough Plan review for Nuneaton and Bedworth. The SA encapsulates the requirements of a strategic environmental assessment (SEA).
- 1.1.2 The SA is being undertaken alongside the development of the Local Plan, with the intention of aiding the decision-making process and discharging legal requirements.
- 1.1.3 At the current stage, the Council has prepared a pre-submission version of the Plan which is being consulted upon in-line with Regulation 19 of the Town and Country Planning Regulations 2012. Alongside the Plan, it is a requirement to prepare and consult upon an 'SA Report'.

## 1.2 This SA Report

- 1.2.1 This report documents the SA process at this stage. The report is structured as follows:

Section 2 Plan details

Section 3 What is the Scope of the SA?

Section 4 Identifying Alternatives (overview)

Section 5 Issues and Options Stage

Section 6: Identifying Alternatives (Preferred Options Stage)

Section 7: Appraisal of Reasonable Alternatives (Preferred Options)

Section 8: Reconsideration of Alternatives (Pre-Submission Stage)

Section 9: Appraisal of Reasonable Site Options

Section 10: Appraisal of the Draft Plan

Section 11: Recommendations

Section 12: Next steps

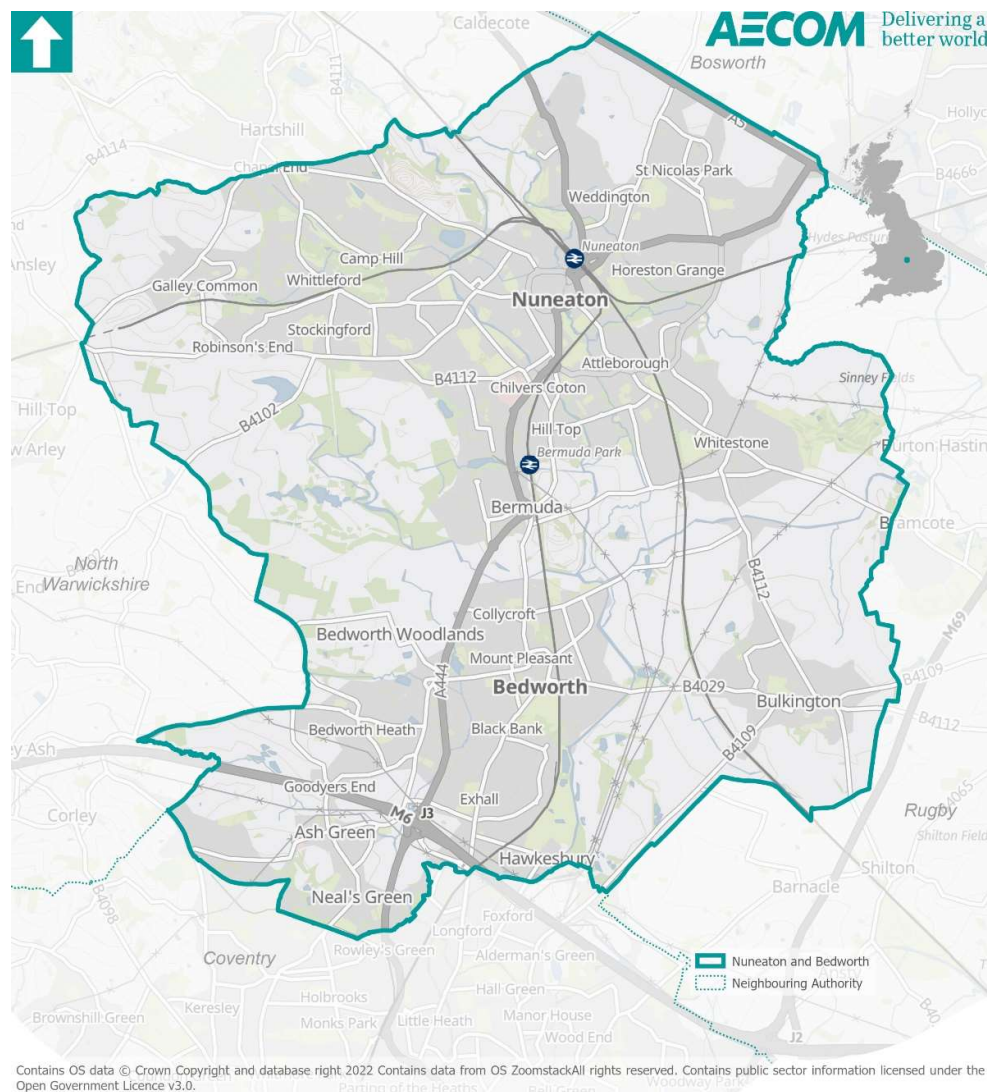


## 2. Plan details

### 2.1 Introduction

- 2.1.1 The Council committed to undertaking an immediate review of the adopted Borough Plan following the publication of the updated National Planning Policy Framework. It is only considered necessary to focus on aspects of the Adopted Plan where changes are required to reflect the current policy context and evidence.
- 2.1.2 In particular, there is a need to review the strategy for housing and employment, respond to the climate change emergency, support sustainable transport, protect and enhance environmental assets, and ensure development is inclusive.
- 2.1.3 The new Plan will guide development from adoption through to 2039. The Plan area is illustrated on Figure 2.1 below and will cover the whole of Nuneaton and Bedworth Borough.

**Figure 2.1** The Plan area



## **2.2 Plan-making to date**

2.2.2 The emerging Local Plan is at Pre-Submission stage, but several steps have already been undertaken to gain a better understanding of the key issues and how these can be addressed.

2.2.3 A consultation was undertaken in May 2021 called the 'Issues and Options Consultation Draft' for the Borough Plan Review. This document introduced the key issues facing Nuneaton and Bedworth alongside a range of options to address these.

2.2.4 An interim SA Report was prepared by the Council alongside the issues and options document which set out the following information:

- Scoping information (context review, baseline information, key issues and methods)
- Appraisal of vision and objectives
- Appraisal of a range of high level options covering the topics of:
  - New employment locations (3 options)
  - Existing employment (5 options)
  - Location of housing in urban areas versus Green Belt (3 options)
  - Location of employment in the urban areas versus Green Belt (3 options)
  - Spatial options for housing (3 options)
  - Protection of primary and secondary frontages (7 options)

2.2.5 An Interim SA Report was prepared by the Council at 'preferred options' stage in June 2022, which set out the following information.

- A summary of the scope of the SA
- Appraisal of seven options for housing growth and distribution
- Appraisal of reasonable site options
- Appraisal of the draft Plan

# 3. What is the scope of the SA?

## 3.1 Introduction

3.1.1 The aim here is to summarise the scope of the SA, i.e. the sustainability themes and objectives that should be a focus of the SA. Full details of the process and outputs can be found in the SA Scoping Report (LINK).

## 3.2 Consultation

3.2.1 The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England. As such, these authorities were consulted over between 5th February 2021 and 12th March 2021. The Environment Agency, Historic England, and Natural England were consulted. Responses received were taken into account and updates presented in the Interim SA Report (May 2021), giving consultees another chance to comment.

## 3.3 The SA framework

3.3.1 Table 3.1 presents a list of objectives, supporting criteria and monitoring indicators that form the backbone of the SA scope. Together they comprise a ‘framework’ under which to undertake assessment.

**Table 3.1:** The SA Framework

Objective	Criteria	Indicators
<b>Economic Factors</b>		
Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough’s inhabitants, through on-going investment (public and private)	Will it meet the employment needs of the local community?	% of working age people in employment (nomisweb.co.uk) [ref. A/1].
	Will it help diversify the economy?	Average gross weekly pay (nomisweb.co.uk) [ref. A/3].
	Will it support small businesses?	Business deaths and births (ons.gov.uk) [ref. A/4].
	Will it maintain a balanced mix of development?	
<b>Social Factors</b>		
Provide decent housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments	Will it promote a range of housing types and tenure?	Affordable dwellings completed (NBBC data) [refs. H2b and H2c].  Average house prices (landregistry.data.gov.uk) [ref. B/3a].

Objective	Criteria	Indicators
Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location	Will it maintain and enhance existing facilities?	% of workforce qualified to NVQ 3+ (nomisweb.co.uk) [ref. B/10].
	Will it put unacceptable pressure on existing services and community facilities?	People of working age in employment (nomisweb.co.uk) [ref. A/1].
	Will it improve access to local services and facilities?	% Of population of working age claiming key benefits (nomisweb.co.uk) [ref. A/2].
	Will it ensure that education and skills infrastructure meet projected future demand and need?	Employment rate (nomisweb.co.uk) [ref. A/1].
	Will it reduce inequalities in education and skills across the Borough?	Index of local deprivation (gov.uk) [ref. B/7].
Reduce crime, fear of crime and antisocial behaviour	Will it promote the reduction of crime rates?	Recorded robberies; burglaries; vehicle crimes percentage (data.warwickshire.gov.uk) [ref. B/8].
	Will it encourage the adoption of principles to 'design out' crime in housing and employment sites?	
Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage	Will it reduce poverty and exclusion in those areas most effected?	Wage/income levels- gross weekly pay (nomisweb.co.uk) [ref. A/3].
Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer	Will it ensure that facilities and locations for cultural activities are protected?	Leisure floor space (NBBC data) [ref. DS2c].
	Will it protect and create high quality or valued recreational spaces and avoid erosion of recreational function?	Change to open space (NBBC data) [ref. HS6c].
Encourage land use and development that creates and sustains well-designed, high quality built environments, that help to create and promote local distinctiveness and sense of place	Will it require good urban design to create attractive, high quality environments where people will choose to live, work and invest?	New residential and commercial developments integrating Secure By Design principles (NBBC data) [ref. BE3d].

Objective	Criteria	Indicators
<b>Biodiversity</b>		
To protect and enhance the natural environment, habitats, species, landscapes and inland waters	Will it protect and enhance species, habitats and sites at risk?	Development causing habitat net losses (NBBC data) [ref. NE3b].
	Will it protect and enhance the natural environment, whether designated or not, including habitats, species, landscapes and controlled waters, particularly maintaining European sites, SSSIs and LNRs to a favorable standard?	Development causing a loss of LBAP habitats and species (NBBC data) [ref. NE3c].
	Will it support development that incorporates improvements to wildlife habitats?	Planning permission granted on designated statutory sites and sites with high biodiversity distinctiveness (NBBC data) [ref. NE3d].
	Will it increase access to green spaces?	
	Will it contribute to adaptation to climate change and ecological networks?	
<b>Population and Human Health</b>		
Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing equitable access to health services	Will it diminish inequalities in mortality, health and wellbeing across the Borough?	Mortality rates - all and from heart disease and stroke, and cancer (fingertips.phe.org.uk) [refs. I/4, I/5 and I/6].
	Will it promote healthy lifestyles and opportunities for exercise?	Life expectancy at birth (ons.gov.uk) [ref. I/1].
	Will it promote opportunities to participate in sport?	Change to open space (NBBC data) [ref. HS6c].
	Will it protect, provide and enhance the provision of quality open space?	Parks/open spaces attaining 'Green Flag' status (NBBC data).
	Will it prevent noise and light pollution?	
<b>Soil</b>		
To protect and improve soil quality	Will it minimise development on Greenfield land?	Land on brownfield land register (NBBC data).
	Will it reduce the amount of derelict, degraded and underused land?	Land on contaminated land register (NBBC data).

Objective	Criteria	Indicators
	Will it reduce the quantity of contaminated land in the Borough?	
<b>Water</b>		
Use natural resources such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment	Will it promote the balance between water supply and demand?	No satisfactory indicator identified, current ones are too broad.
	Will it encourage water efficiency and conservation?	
	Will it minimise adverse effects in ground and surface water quality?	
	Will it protect and enhance the quality of watercourses?	
Ensure that new developments minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas	Will it avoid developments in areas being at risk from fluvial, sewer or groundwater flooding?	The number of planning permissions granted contrary to advice of Environment Agency on grounds of flood risk (NBBC data) [ref. NE4a].
	Will it provide habitat creation?	
	Will it support the connection of blue corridors?	
<b>Air</b>		
Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents	Will it maintain and improve local air quality?	Pollutant levels (NBBC data) [ref. E/1].
	Will it reduce traffic congestion and improve road safety?	Number of AQMAs (NBBC data) [ref. E/2].
Ensure development is primarily focused in urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car	Will it focus development in the major urban areas?	Proportion of adults walking for travel (gov.uk) [ref. E/6].
	Will it promote compact, mixed-use developments with good accessibility to local facilities and service that reduce the need to travel?	Proportion of adults cycling for travel (gov.uk) [ref. E/6].
	Will it reduce the number and length of journeys made by car?	

Objective	Criteria	Indicators
	Will it promote alternative, more sustainable modes of transport to the car (including walking and cycling) through location of housing, employment sites, services and facilities, and appropriate infrastructure for sustainable modes of transport?	
<b>Climatic Factors</b>		
Reduce overall energy use through increased energy efficiency	Will it reduce or minimise greenhouse gas emissions?	Carbon dioxide emissions by sector and per capita (gov.uk) [ref. G/1].
	Will it increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating and transportation?	
Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial, and industrial sources	Will it contribute to the creation of a low carbon economy and minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources?	Carbon dioxide emissions by sector and per capita (gov.uk) [ref. G/1].
	Will it promote the adoption of climate change adaptation and climate proofing principles in planning and design?	
	Will it promote sustainable urban drainage systems?	
<b>Material Assets</b>		
Encourage and enable waste minimisation, reuse, recycling, and recovery to divert resources away from the waste stream, including the use of recycled materials where possible	Will it reduce waste arising (household and commercial)?	LACW recycled and composted (NBBC data) [refs. J/1 and J/3].
	Will it increase recycling and composting rates and encourage easily accessible recycling systems?	
	Will it promote re-use of resources?	

Objective	Criteria	Indicators
To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land	Will it encourage land use and development that optimises the use of previously developed land and buildings?	Housing developments on previously developed land (NBBC data) [no ref. but reported in AMR].
	Will it encourage development which makes more efficient use of land; and seek greater intensity of development at places with good public transport accessibility?	
<b>Cultural heritage</b>		
To conserve and enhance the historic environment	Will it conserve and enhance sites, features and areas of historical, archaeological and cultural value?	Number of listed buildings (Grade I and II*) at risk (historicengland.org.uk) [ref. K/1].  Loss of designated historic assets (NBBC data) [ref. BE4b].
<b>Landscape</b>		
To maintain and enhance the quality of landscapes	Will it enhance and manage the character and appearance of the Borough's landscapes, maintaining and strengthening local distinctiveness and sense of place?	Development given planning permission in highly valued landscape areas (NBBC data) [ref. NE5a].



# 4. Identifying alternatives (Overview)

## 4.1 Introduction

- 4.1.1 A key part of the SA process is the consideration and testing of reasonable alternatives. The Regulations do not state what constitutes a reasonable alternative or when in the process reasonable alternatives need to be appraised. However, an important requirement is for alternatives to be tested at a formative stage of Plan-making (this means before important decisions have been made about the content of the Plan such as the spatial strategy and site allocations). In this respect, the Council has explored options from the outset of the process in support of key stages of consultation.
- 4.1.2 It is for Council (as the plan-maker) to determine what alternatives are reasonable (and which are not). The Council has identified what it considers to be reasonable alternatives at each stage of Plan making, as summarised in Figure 4.1 below. As the level of detail in the Plan increased, and the strategy began to emerge, the scope of the options naturally became narrower and more detailed.

**Figure 4.1** Reasonable alternatives at key stages of Plan-making



# 5. Issues and Options Stage

## 5.1 Introduction

5.1.1 The Council undertook an Issues and Options consultation in May 2021, which was accompanied by an Interim SA Report. Given that the detailed elements of the plan had yet to be determined at this stage, the options were relatively high-level. The SA included consideration of the following:

- Compatibility of the vision, aims and objectives of the Plan and the 19 SA Objectives.
- Options for the location of new employment estates
- Options for non-employment uses in employment estates
- Options for residential and Green Belt
- Options for employment and Green Belt
- Options for location of new residential developments
- Options for use classes in town centres
- Options for frontages in town centres

## 5.2 Options for the location of employment estates

5.2.1 Three options were identified in the issues and options paper in relation to the location of new employment land at a broad level. These options were not necessarily mutually exclusive, and did not identify specific parcels of land. Therefore, the findings (summarised below) are high-level and intended to identify broad constraints and benefits of each approach.

SA Objective	Options		
	1. Extensions to existing estates	2. New sites close to the A5	3. New sites close to J5 of the M6
1. Sustainable transport	++	+	+
2. Focus on urban areas	-	--	--
3. Biodiversity	-	--	--
4. Climate change	+	--	--
5. Cultural heritage	?	?	?
6. Economy	++	++	++
7. Landscape	-	--	--
8. Waste management	-	-	-
9. Resource use	-	--	--
10. Health and equalities	?	?	?
11. Housing	-	-	-
12. Accessibility	+	+	+
13. Crime	?	?	?
14. Poverty & disadvantage	?	?	?
15. Sport and recreation	-	-	-
16. High quality design	?	?	?
17. Soil	--	--	--
18. Water	-	-	-
19. Flooding	-	-	-

## 5.3 Options for non-employment uses in employment estates

5.3.1 This set of options are 'procedural' in nature, and do not set out the specific uses or locations that would be involved. Therefore, there is a great deal of uncertainty with regards to the effects on the SA Objectives. The key difference between the options is that a flexible / bespoke approach which sets out the areas where alternative uses are flexible would be more likely to support economic objectives and good accessibility.

SA Objective	1. Continued protection	2. Set out allowable uses in all employment areas	3. Set out the employment areas where alternative uses are acceptable	4. Restrict the number of non-employment uses that can be accommodated	5. Remove protection for employment uses
1. Sustainable transport	?	?	?	?	?
2. Focus on urban areas	?	?	?	?	?
3. Biodiversity	?	?	?	?	?
4. Climate change	?	?	?	?	?
5. Cultural heritage	?	?	?	?	?
6. Economy	+	+	++	++	+
7. Landscape	?	?	?	?	?
8. Waste management	?	?	?	?	?
9. Resource use	?	?	?	?	?
10. Health and equalities	?	?	?	?	?
11. Housing	-	-	-	-	-
12. Accessibility	+	+	++	++	+
13. Crime	?	?	?	?	?
14. Poverty & disadvantage	?	?	?	?	?
15. Sport and recreation	-	-	-	-	-
16. High quality design	?	?	?	?	?
17. Soil	?	?	?	?	?
18. Water	?	?	?	?	?
19. Flooding	?	?	?	?	?

## 5.4 Options for residential and Green Belt

5.4.1 These options are not site or locational specific, so the predicted effects should be interpreted as an indication of the potential effects. A number of assumptions are made when undertaking high level appraisals, such as urban areas being more likely to have sustainable transport links, and Green Belt locations likely to be more sensitive with regards to landscape. This leads to option 2 being slightly less favourable compared to Option 1. Option 3 by its very nature is likely to have positive effects for a range of SA Objectives as it seeks to prioritise the 'most sustainable' locations. However, 'most sustainable' is subjective and dependant upon what factors are prioritised. Here, there is an acknowledgement that locations that are well located in terms of transport, and avoiding environmental effects could be at the detriment of soil resources, and involve greater use of natural resources (given that urban areas would not necessarily be prioritised).

SA Objective	1.Prioritise urban areas, then non Green-Belt land in the countryside	2. Prioritise urban areas then all other land in the countryside regardless of Green Belt status	3.Prioritise to the 'most sustainable locations' regardless of land classification
1. Sustainable transport	++	++	++
2. Focus on urban areas	++	++	-
3. Biodiversity	++	++	++
4. Climate change	+	+	++
5. Cultural heritage	-	-	++
6. Economy	+	+	+
7. Landscape	++	+	++
8. Waste management	+	+	-
9. Resource use	++	++	-
10. Health and equalities	?	?	?
11. Housing	++	++	++
12. Accessibility	++	++	++
13. Crime	?	?	?
14. Poverty & disadvantage	?	?	?
15. Sport and recreation	?	?	?
16. High quality design	?	?	?
17. Soil	++	++	-
18. Water	-	-	-
19. Flooding	+	+	++

## 5.5 Options for employment and Green Belt

5.5.1 The options are high level and not site specific. Therefore, assumptions are made that there is greater potential for negative effects on land in the countryside in terms of being less accessible, potentially of greater biodiversity and landscape value, and necessitating new infrastructure and natural resources.

5.5.2 In terms of options 1 and 2, the key difference is in performance on landscape, as there are areas of Green Belt land that are more sensitive than other countryside areas. Option 3 is predicted to be most positive for several SA topics, which is to be expected given that it prioritises the 'most sustainable locations'. However, in reality, there will be a trade off between different elements of sustainability, and it may not be possible for all locations to be 'the most sustainable' for all aspects of sustainable development. There is a need for more detailed assessment to determine which locations and sites are 'most sustainable'.

SA Objective	1.Prioritise non Green Belt land in the countryside	2. Prioritise land in the countryside regardless of Green Belt status	3.Prioritise to the 'most sustainable locations' regardless of land classification
1. Sustainable transport	-	-	++
2. Focus on urban areas	--	--	--
3. Biodiversity	--	--	++
4. Climate change	-	-	++
5. Cultural heritage	+	+	+
6. Economy	++	++	++
7. Landscape	-	--	++
8. Waste management	-	-	-
9. Resource use	--	--	--
10. Health and equalities	?	?	?
11. Housing	?	?	?
12. Accessibility	+	+	+
13. Crime	?	?	?
14. Poverty & disadvantage	?	?	?
15. Sport and recreation	?	?	?
16. High quality design	?	?	?
17. Soil	--	--	--
18. Water	-	-	-
19. Flooding	-	-	++

## 5.6 Options for the location of new residential developments

5.6.1 The options result in quite different effects with regards to different SA Objectives.

5.6.2 Retaining development within existing settlement boundaries is considered likely to be beneficial with regards to accessibility, and will also limit negative effects on landscape, soil resources and resource use. However, it is considered (broadly speaking) that this could potentially have a more negative effect on cultural heritage, given that there are greater concentrations of designated assets in these locations, and restriction of growth could lead to less appropriate densities. An approach centred on transport infrastructure is also likely to be positive with regards to sustainable transport and accessibility, and would not necessarily require development in sensitive locations for landscape, cultural heritage and biodiversity. However, the creation of new settlements is predicted to lead to a greater use of resources to support infrastructure, and also lead to a loss of soil resources.

5.6.3 Option 3 performs least well for a number of SA Objectives, as there is a presumption that development on greenfield sites in the countryside are more likely to have negative effects on biodiversity and landscape. These locations are also more likely to be peripheral and not supported by services and sustainable transport. Similar to Option 2, it is also likely that there will be a loss of soil resources, and the need for new resources to support development on greenfield land.

SA Objective	1.Within existing settlement boundaries	2.Small SUEs focused on transport infrastructure	3.Non Green Belt areas in the countryside
1. Sustainable transport	++	++	-
2. Focus on urban areas	++	--	--
3. Biodiversity	++	++	--
4. Climate change	+	++	-
5. Cultural heritage	-	+	+
6. Economy	+	+	+
7. Landscape	++	++	--
8. Waste management	+	-	-
9. Resource use	++	--	--
10. Health and equalities	?	?	?
11. Housing	++	++	++
12. Accessibility	++	+	-
13. Crime	?	?	?
14. Poverty & disadvantage	?	?	?
15. Sport and recreation	?	?	?
16. High quality design	?	?	?
17. Soil	++	--	--
18. Water	-	-	+
19. Flooding	?	++	-

## 5.7 Options for use-classes in town centres

5.7.1 For the majority of SA Objectives, uncertain effects are predicted for all four options. In one sense, this is because it is uncertain as to the extent to which town centre uses would change. It is also uncertain as to how changes in town centre uses would affect land uses elsewhere. Several SA Objectives are also unlikely to be significantly affected by changes in town centre uses, as they are not directly linked or sensitive to changes in use. Where effects have been predicted (for economy, housing, accessibility, and sport and recreation), they are all positive (to differing extents). For example, Option 4 is predicted to be most positive for housing given that it is more supportive of residential changes. Option 2 is predicted to be less positive in terms of economy, as it is more restrictive regarding A4/A5 uses.

SA Objective	1.Class E, A4 and A5 (as was) are acceptable	2.Class E acceptable but not A4/A5 (as was)	3.Class E and F1 are acceptable	4.Class E and C3 (residential) acceptable
1. Sustainable transport	?	?	?	?
2. Focus on urban areas	?	?	?	?
3. Biodiversity	?	?	?	?
4. Climate change	?	?	?	?
5. Cultural heritage	?	?	?	?
6. Economy	++	+	++	++
7. Landscape	?	?	?	?
8. Waste management	?	?	?	?
9. Resource use	?	?	?	?
10. Health and equalities	?	?	?	?
11. Housing	+	+	+	++
12. Accessibility	++	++	++	++
13. Crime	?	?	?	?
14. Poverty & disadvantage	?	?	?	?
15. Sport and recreation	+	+	+	+
16. High quality design	?	?	?	?
17. Soil	?	?	?	?
18. Water	?	?	?	?
19. Flooding	?	?	?	?



## 5.8 Options for frontages in town centres

5.8.1 For all but two of the SA Objectives, the effects are predicted to be uncertain. This is mainly because there is no clear link between the SA objectives and shop frontages effects will also depend upon which frontages are affected, which is difficult to determine. Having said this, it is possible to identify positive effects for all three options with regards to 'economy' as each approach ought to support economic activity in the town centres. Option 1 is considered to be the only option with negative effects, as removing all frontage designations would not be compatible with the SA Objective 'Focus on urban areas'.

SA Objective	1, Remove all designations for frontages	2. Reassess and redraw boundaries for frontages	3. Retain the current extent of frontages in the adopted Plan
1. Sustainable transport	?	?	?
2. Focus on urban areas	-	+	+
3. Biodiversity	?	?	?
4. Climate change	?	?	?
5. Cultural heritage	?	?	?
6. Economy	+	+	+
7. Landscape	?	?	?
8. Waste management	?	?	?
9. Resource use	?	?	?
10. Health and equalities	?	?	?
11. Housing	?	?	?
12. Accessibility	?	?	?
13. Crime	?	?	?
14. Poverty & disadvantage	?	?	?
15. Sport and recreation	?	?	?
16. High quality design	?	?	?
17. Soil	?	?	?
18. Water	?	?	?
19. Flooding	?	?	?

## 6. Identifying alternatives (Preferred Options Stage)

### 6.1 Alternative strategies for housing delivery

- 6.1.1 At preferred options stage, the Council identified a preferred approach to housing delivery, which included establishing an appropriate housing target, a spatial strategy and supporting site allocations. This process was informed by consideration of different alternatives both in terms of broad locations of growth and the overall quantum. Site options were also appraised individually.
- 6.1.2 The alternatives appraisal work at this stage sought to build on previous stages of plan making and SA, and therefore the alternatives are described in greater detail compared to those explored at issues and options stage. The range of issues being focused upon is also more refined, to reflect the key elements of the Plan that reasonable alternatives are relevant for at this stage.
- 6.1.3 Following from issues and options stage and drawing upon the evidence of housing needs and supply, the Council identified several alternatives that were considered to be reasonable. The options are summarised in table 6.1 below, setting out the broad assumptions about the level of growth and locations for growth that would be involved. Each option is also supported by a map which shows the key sites that would be rolled forward from the existing Adopted Plan and the additional sites that would be involved under each option.
- 6.1.4 The Council considered that the most appropriate method for identifying housing needs was to use an alternative standard method calculation, which gave a figure of 646 dwellings per annum. This was therefore taken as the starting point when identifying reasonable amounts of housing delivery.
- 6.1.5 There are various elements of supply that would remain constant across each of the options. These are as follows:
- Commitments (Full and outline planning permissions) and completions are assumed to come forward.
  - Windfall assumption of 22dpa<sup>1</sup>.
  - 10% deduction for non-delivery on small sites.
  - Existing strategic allocations in the Adopted Local Plan that are still considered appropriate and deliverable will be carried forward.

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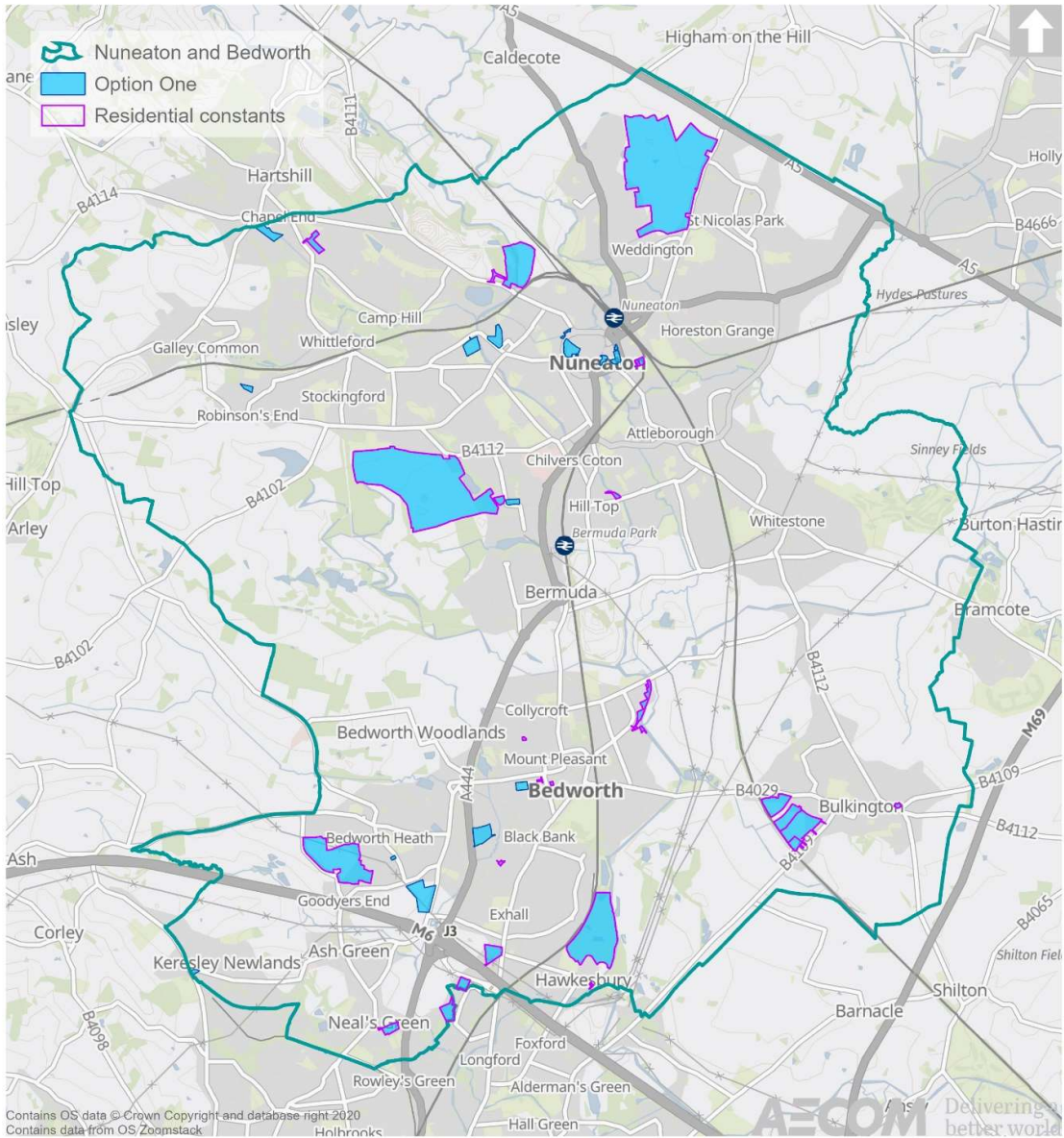
<sup>1</sup> It has recently been investigated and demonstrated that 42dpa is more of an appropriate approach.

**Table 6.1** Strategic options for housing delivery (residual housing)

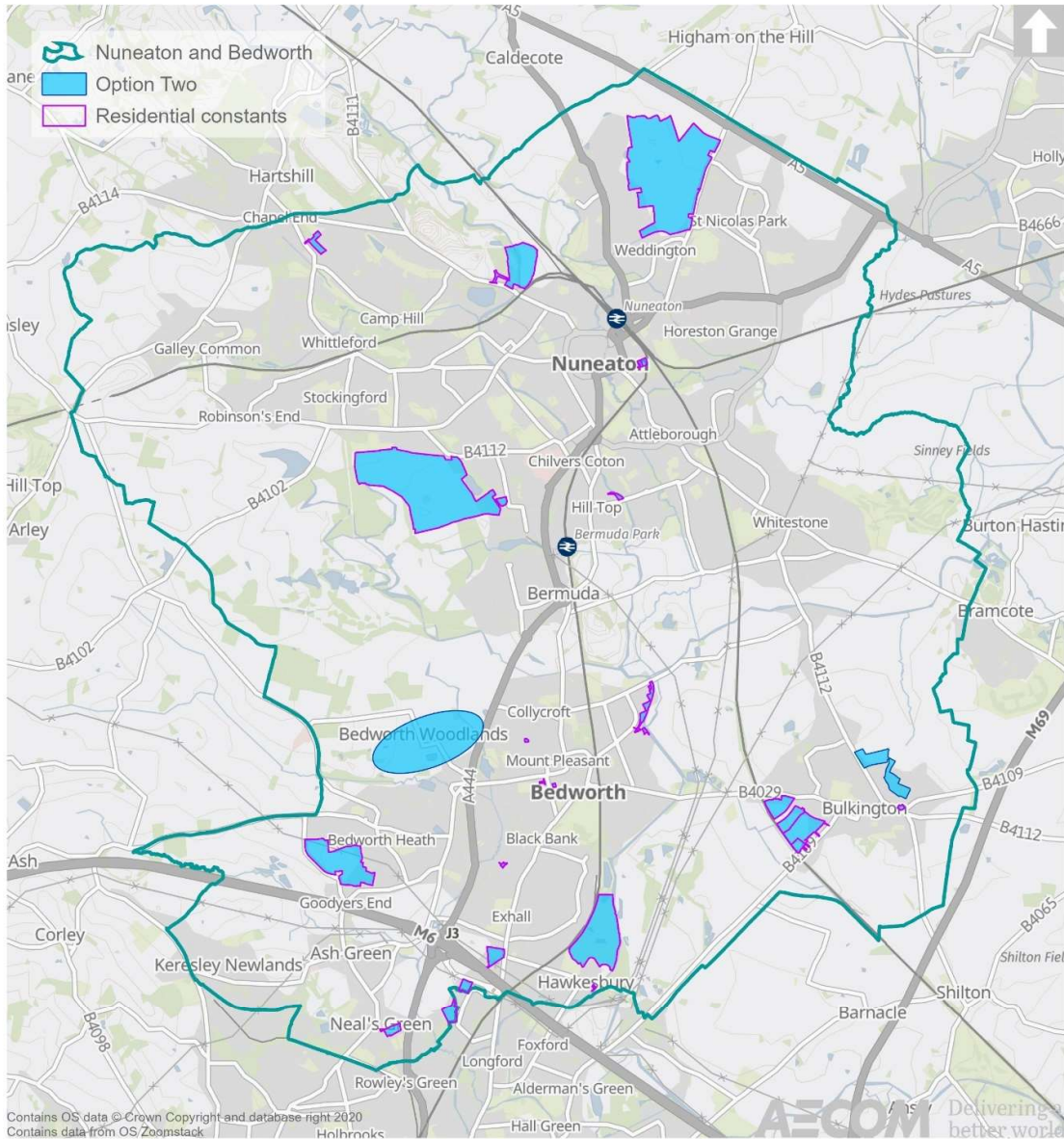
<b>Strategic option</b>	<b>Approx dpa</b>	<b>Assumptions</b>
1.Urban dispersal	646 dpa	Two strategic sites in the adopted Local Plan would be de-allocated (HSG4 Woodlands and HSG7 East of Bulkington <sup>2</sup> ). Additional sites to be allocated in the urban area (primarily focused in Nuneaton) to substitute for the de-allocation of these strategic sites.
2.Existing strategy rolled forward	660 dpa	Strategic sites HSG4 and HSG7 would be rolled forward, meaning that no additional sites would need to be found to meet the housing requirement.
3a.Strategic focus (Galley Common)	680 dpa	Rather than substituting HSG4 and HSG7 with urban dispersal, growth could be directed to a new strategic location at Galley Common. There is an assumption that strategic growth would need to be at least 1000 dwellings to create the economies of scale required to support social and transport infrastructure improvements.
3b) Strategic focus (North of Nuneaton)	680 dpa	Rather than substituting HSG4 and HSG7 with urban dispersal, growth could be directed to further growth at the strategic location north of Nuneaton.
4) Increased dispersal in the urban areas	712 dpa	To increase flexibility and choice in housing delivery it is reasonable to test an option that involves additional site allocations throughout the urban areas. There are a range of sites available that could potentially be involved as illustrated on the accompanying map for this option.
5a) Dispersal plus strategic focus (Galley Common)	712 dpa	To increase flexibility in delivery, a mix of urban dispersal plus a strategic growth location at Galley Common could be pursued.
5b) Dispersal plus strategic focus (North of Nuneaton)	712 dpa	To increase flexibility in delivery, a mix of urban dispersal plus strategic growth north of Nuneaton could be pursued.

<sup>2</sup> No planning application has been submitted for HSG4 Woodlands and there is no indication that an application may be forthcoming. Significant infrastructure is required to be delivered and there is no indication of when this will happen or be funded. The lack of delivery for the HSG4 has, and continues to have, a bearing on the Council's Housing Trajectory which informs the Five Year Housing Land Supply. For HSG7 a pre-application submission was received in August 2021. This has indicated issues that may compromise potential delivery of the site.

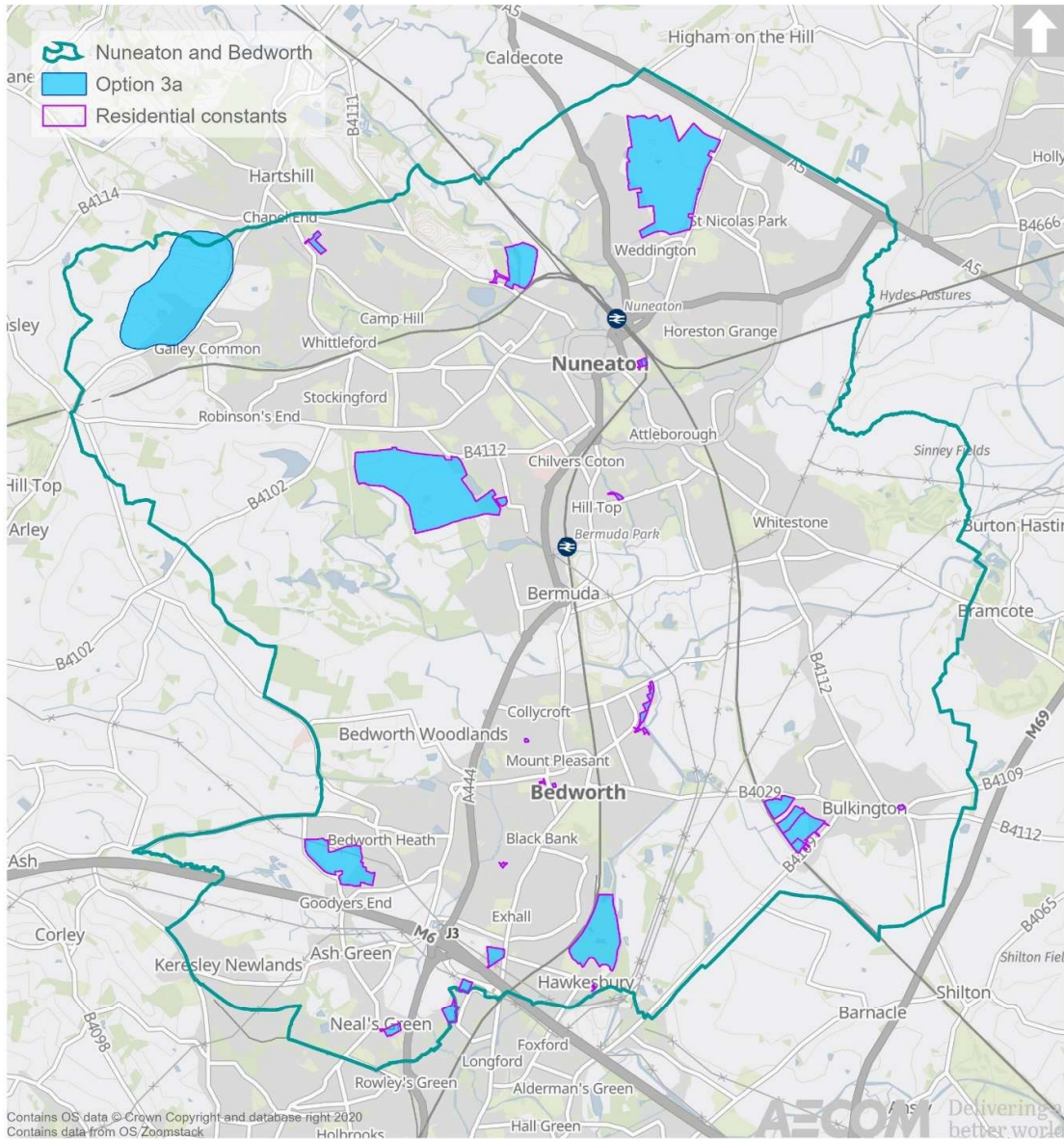
**Figure 6.1 Housing Strategy Option 1: Urban Dispersal**



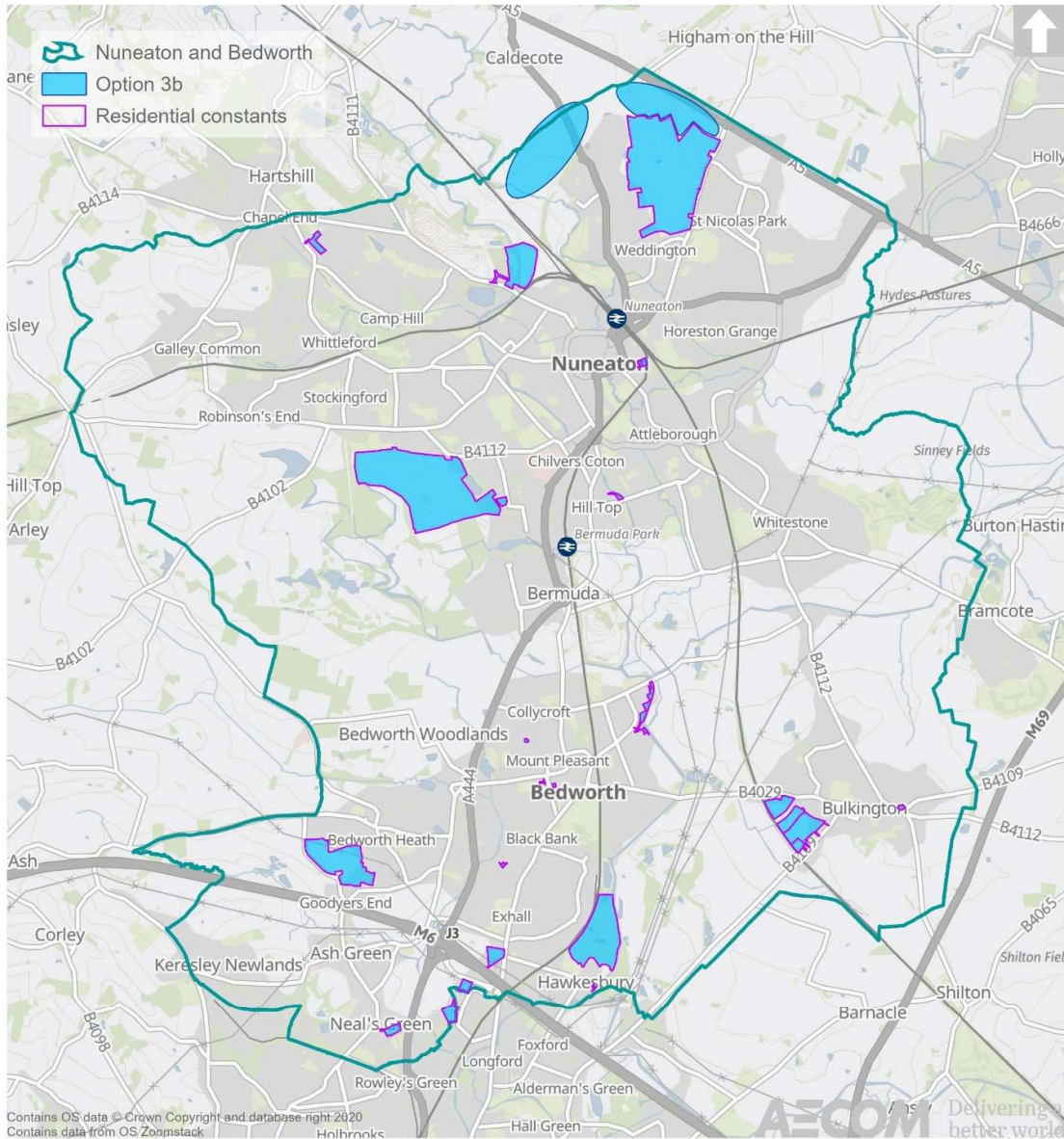
**Figure 6.2 Housing Strategy Option 2: Continuation of Adopted Plan**



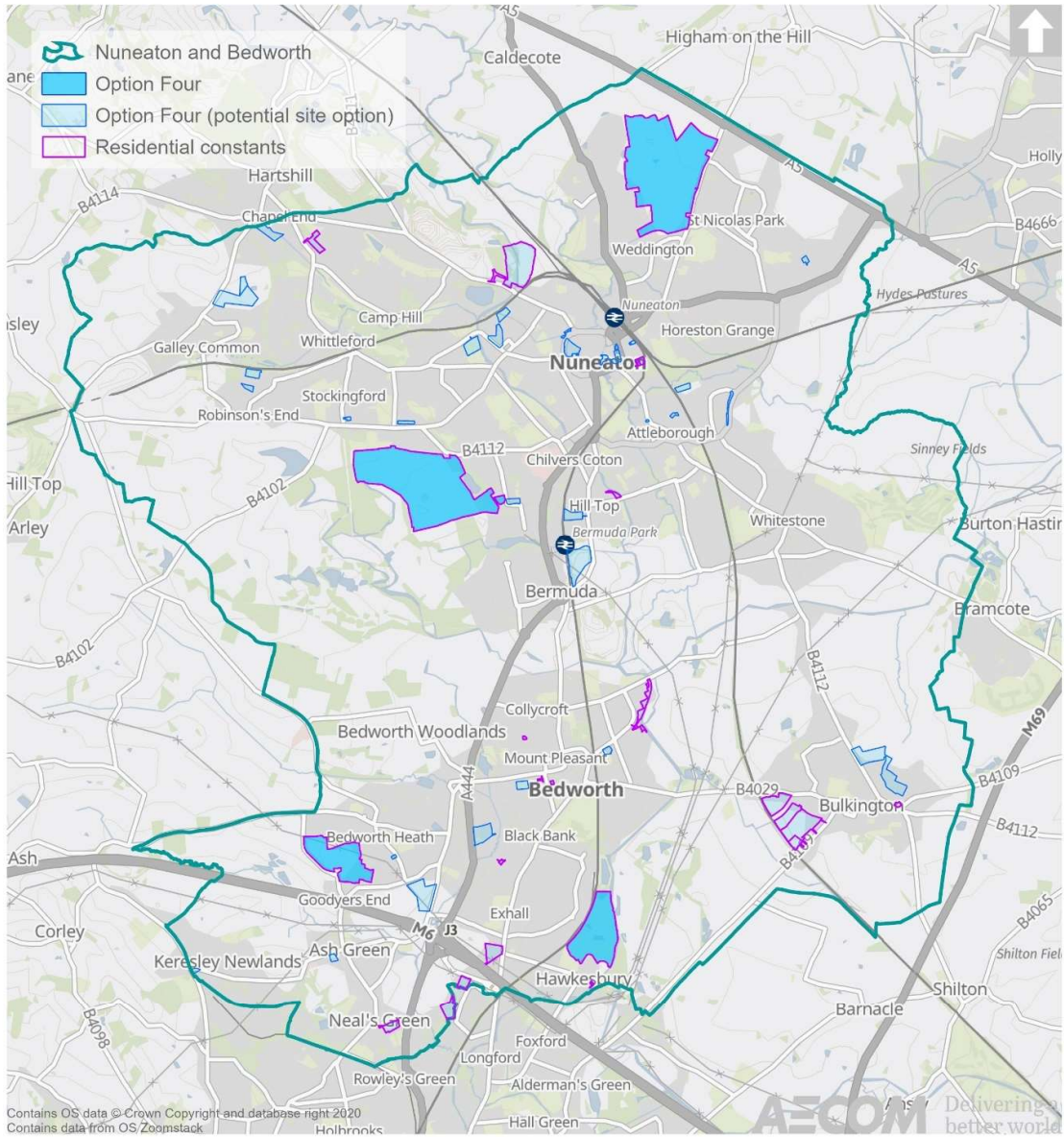
**Figure 6.3 Housing Strategy Option 3a: Galley Common Strategic Location**



**Figure 6.4 Housing Strategy Option 3b: North Nuneaton Strategic Location**

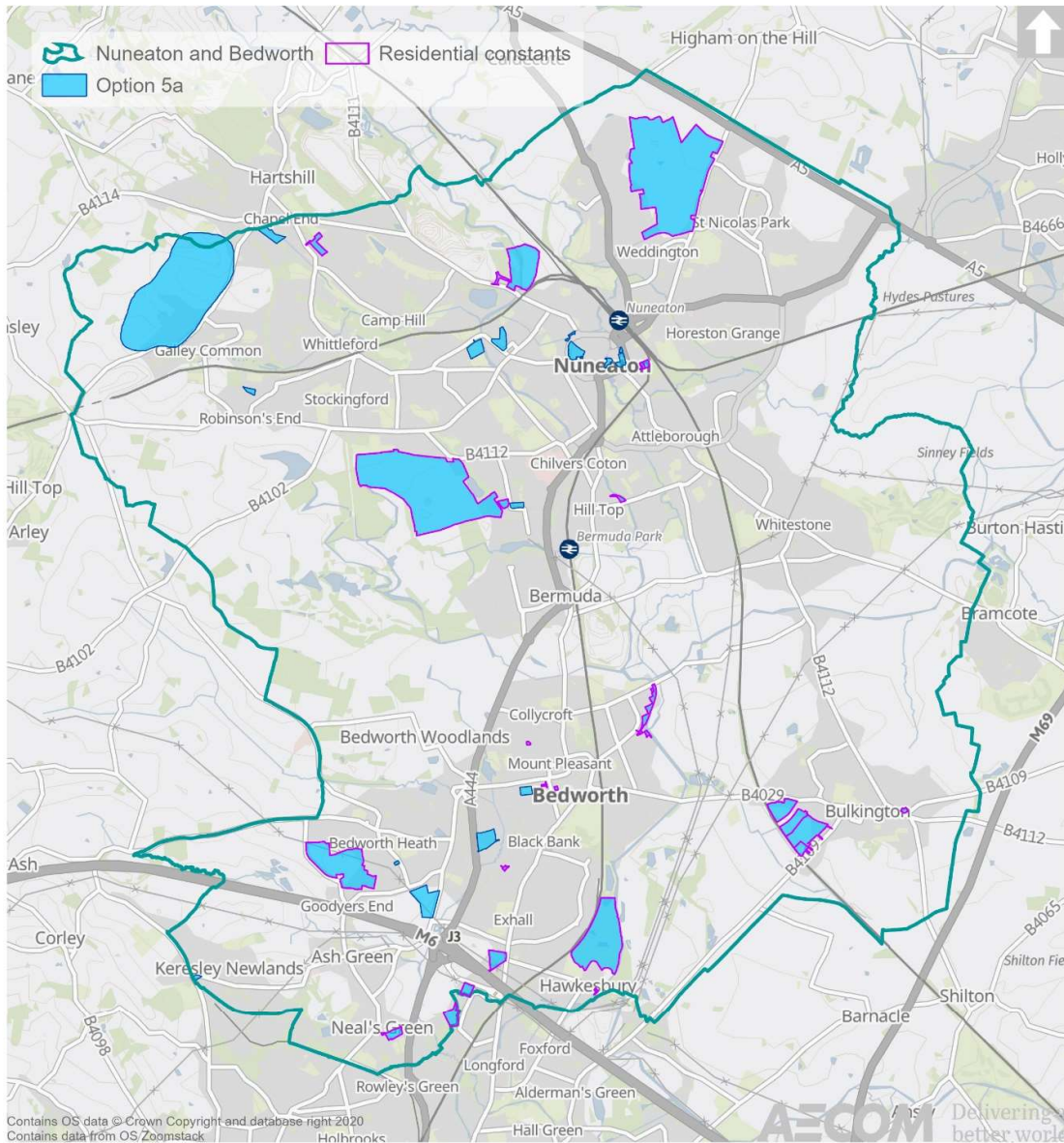


**Figure 6.5 Housing Strategy Option 4: Increased urban dispersal**

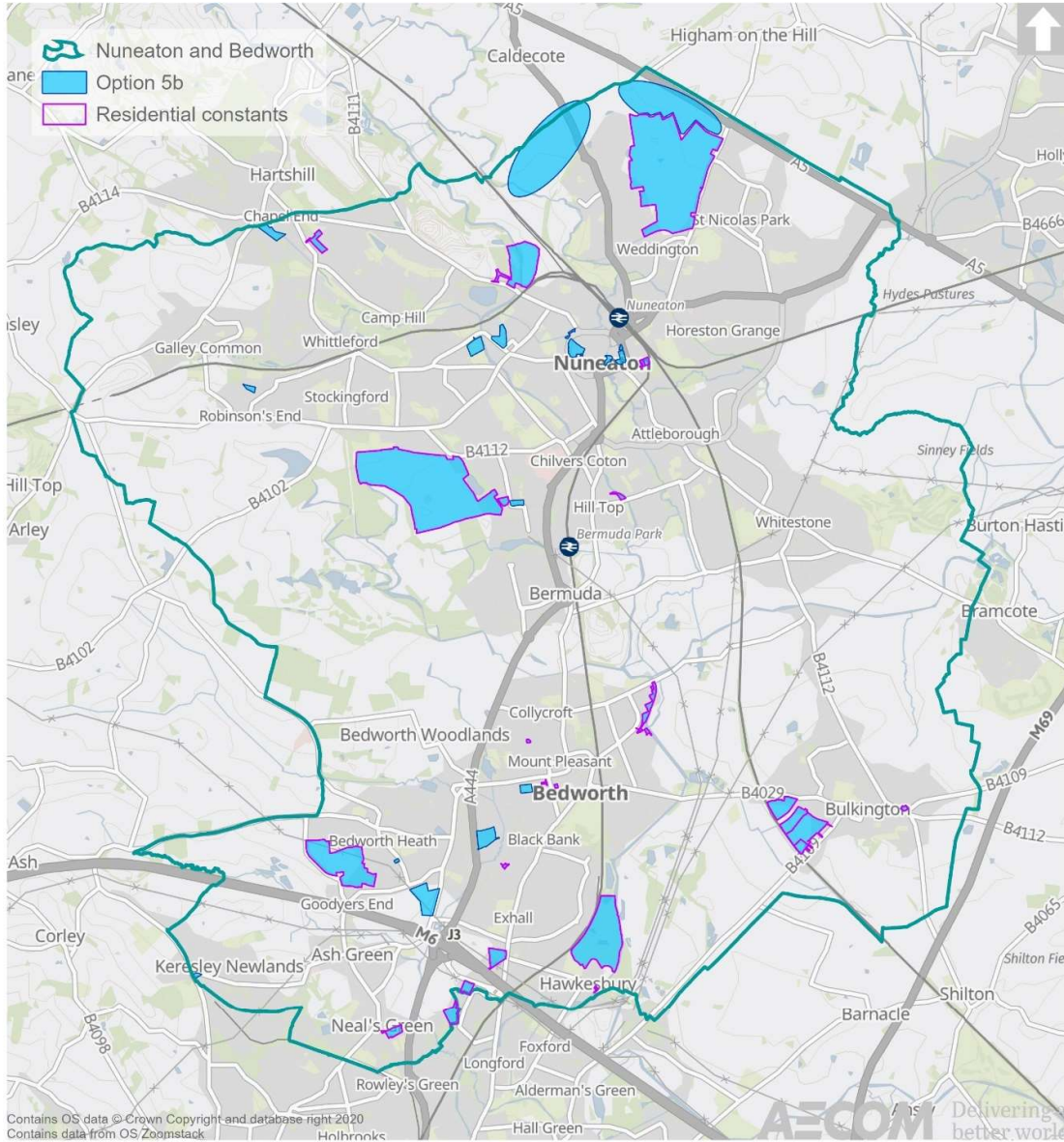




**Figure 6.6** Housing Strategy Option 5a: Urban dispersal plus strategic growth at Galley Common



**Figure 6.7** Housing Strategy Option 5b: Urban dispersal plus strategic growth at North Nuneaton



## **6.2 Unreasonable alternatives**

### **Green Belt release**

- 6.2.1 The Council consider it unnecessary to continue exploring the potential for Green Belt release to deliver housing growth. There are sufficient sites within the urban area and the countryside that are not Green Belt and these would well exceed identified housing needs for the Borough. Even in the event that needs may increase in response to changes in evidence or cross boundary issues, it is still considered that there are sufficient non-green belt sites to explore first.

### **Low growth**

- 6.2.2 The Council considered it unreasonable to plan for a level of housing that would not be likely to meet identified needs under the alternative standard methodology projection. There do not appear to be any special circumstances or overriding issues that would justify lower levels of housing delivery in Nuneaton and Bedworth than the proposed approach.
- 6.2.3 Although the household projections scenario suggested that 425dpa would be an appropriate amount of housing to plan for, this would already be exceeded by simply continuing with the strategy (and all allocated sites) in the currently adopted Local Plan. It is considered unreasonable to de-allocate a larger amount of strategic sites when there is evidence of delivery and longer term strategies for such locations that are already underway.

# 7. Appraisal of reasonable alternatives (Preferred Options)

## 7.1 Introduction

7.1.1 For each reasonable alternative, an appraisal has been undertaken against the SA Framework.

7.1.2 In determining the significance of effects, professional judgement has been applied, being mindful of key effect characteristics including: magnitude, likelihood, duration, timeframe and cumulative effects. A range of information sources have been utilised to inform judgements:

- Geographical Information Systems data (which sets out a high level appraisal of each reasonable site options).
- Inputs from technical studies.
- Reference to the Scoping Report and first Interim SA Report.

7.1.3 Whilst every effort is taken to predict effects accurately, there is a degree of uncertainty that must be acknowledged given the strategic nature of the appraisal. In particular, the level of detail is less granular with regards to specific on site characteristics, so there is a reliance on higher level datasets (for example; the presence of designated environmental assets).

7.1.4 It is important to ensure a consistent comparison between the options. For this reason, the same high-level assumptions are made with regards to mitigation and enhancement. Rather than taking into account specific scheme details (which may be available for some locations and not others), the appraisal identifies the baseline situation for each site and how development could affect this.

7.1.5 This is not to say that such effects could not be different when mitigation and enhancement considerations are fully appreciated. In this respect, all of the options have been considered equally alongside the draft Plan policies within the Borough Plan Preferred Options consultation document.

## 7.2 Summary of effects

7.2.1 Table 7.1 below presents a visual summary of the appraisal findings for each of the reasonable alternatives. Following this is a discussion of the effects of each option and a brief comparison of how the options perform comparatively.

7.2.2 The full appraisal of each the proposed preferred options version of the Plan and the reasonable alternatives is provided in Appendix A.

**Table 7.1: Summary of appraisal findings (Preferred Options Stage)**

SA Topic	1. Urban dispersal	2. Existing strategy	3a. Galley Common	3b. North Nuneaton	4. Further Dispersal	5a. Dispersal + Galley Common	5b. Dispersal + North Nuneaton
1. Economic factors	Light Green	Grey	Light Green	Yellow	Light Green	Yellow	Light Green
2. Social factors	Light Green	Yellow	Light Green	Yellow	Light Green	Light Green	Light Green
3. Biodiversity	Grey	Grey	Grey	Grey	Grey	Grey	Grey
4. Population and health	Light Green	Yellow	Light Green	Yellow	Light Green	Light Green	Light Green
5. Soil	Light Green	Grey	Yellow	Yellow	Grey	Yellow	Yellow
6. Water	Light Green	Light Green	Light Green	?	Light Green	Light Green	?
7. Air quality	Grey	Grey	Yellow	Yellow	?	Yellow	Yellow
8. Climatic factors	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
9. Material assets	Light Green	Grey	Grey	Grey	Grey	Yellow	Yellow
10. Cultural Heritage	Light Green	Yellow	Grey	Grey	Light Green	Yellow	Light Green
11. Landscape	Light Green	Grey	Orange	Yellow	Light Green	Light Green	Light Green

**Interpreting the significance of effects**

Major positive	Dark Green
Moderate positive	Light Green
Minor positive	Very Light Green
Neutral	Grey
Minor negative	Yellow
Moderate negative	Orange
Major negative	Red
Uncertainty	?

## **7.3 Discussion of options**

- 7.3.1 Taking a 'business as usual' approach would involve continuing the existing strategy in the Adopted Borough Plan. In most respects, this would have neutral effects because there would be little change. However, it could be negative in terms of housing as several of the strategic sites have not come forward readily. Positive effects would be expected to arise as a result of improvements to policies relating to natural resources (particularly water) and climate change.
- 7.3.2 Each of the other options would make slight changes to the existing spatial strategy. For option 1, an urban dispersal approach is taken and several sites in the adopted local plan would no longer be allocated. The effects of this are mixed. There are benefits in terms of housing, as a wider range of additional sites are proposed rather than strategic sites which are not showing signs of delivery. Several of these sites are brownfield and / or of a lower environmental quality than strategic sites they would 'substitute' and therefore the effects on landscape, soil and material assets would be minor positives. Similarly, the location of development is in locations that should support good access to services and help benefit areas in need of regeneration. Some negative effects could arise though in terms of cultural heritage and new communities being close to areas of poor air quality.
- 7.3.3 Rather than pursuing a dispersed approach to residual housing, the alternative would be to find strategic locations for growth. Two have been identified as reasonable options, and both perform very similar to one another. The main difference relates to landscape, as the Galley Common option is likely to lead to more significant negative effects given the sensitivity of land in this location.
- 7.3.4 Compared to the urban dispersal approach these two approaches both perform worse with regards to several sustainability factors. This includes landscape as previously mentioned, soil (given that greater amounts of greenfield land and agricultural land would be affected) and air quality given that these are out of town locations and would likely lead to greater car trips.
- 7.3.5 The two strategic location options are less likely to lead to negative effects in terms of cultural heritage compared to urban dispersal. They would also be likely to have positive effects on socio-economic factors, but the potential to have benefits for deprived communities is slightly less than an urban dispersal approach.
- 7.3.6 As the scale of growth increases under an urban dispersal approach (Option 4), the positive effects in relation to housing, economy and population rise from minor to moderate, reflecting an increased range of housing and supporting infrastructure and investment. Despite this increase in growth, the only additional negative effects are likely to arise in relation to air quality (due to an overall increase in car traffic that could arise in the urban areas near to AQMAs). Compared to a lower growth scenario, the effects in relation to soil and material assets are less positive given that there could be an increased amount of greenfield land involved.

7.3.7 Combining an urban dispersal approach with additional strategic locations for growth would also result in higher overall housing growth. As such, the positive effects for social and economic factors are also likely to increase accordingly. However, increased negative effects are predicted with regards to material assets associated with increased use of greenfield land and natural resources. The regeneration benefits in the urban areas would still arise under these approaches as they would involve an element of urban dispersal. However, compared to option 4, both options 5a and 5b are slightly less favourable in terms of several sustainability topics. This relates to the greenfield nature of strategic growth, and the poorer relationship with employment opportunities and existing infrastructure compared to Option 4.

## **7.4 Summary of the preferred approach**

7.4.1 At preferred options stage, the Council identified Option 1 (Urban Dispersal) as its preferred approach. The housing growth target was based on the interim findings of a housing and employment land study undertaken by Icen Projects, which uses an 'alternative standard projection'.

7.4.2 In terms of distribution, the Council seek to deliver a 'brownfield first' approach to make maximum use of underused or vacant sites within the urban areas before looking at countryside areas. No Green Belt sites are identified. This approach is consistent with national policy and accords with the vision and objectives for the Plan review.

7.4.3 The SA findings at this stage were broadly supportive of this approach, demonstrating that (compared to the alternatives) there would be fewer negative effects on landscape, soil and air quality, with more significant positive effects in terms of social factors and population.

7.4.4 In terms of other plan policies, the Plan has been strengthened with regards to several factors, notably; climate change, natural resource protection, biodiversity net gain, and design quality. This is reflected by the positive effects highlighted below in table 7.2.

7.4.5 The matrix below illustrates the overall effects of the preferred options Plan (i.e. the proposed allocations and any other amendments to the adopted Plan policies considered together). This corresponds to Option 1 discussed in Section 6 and Appendix A.

## **7.5 Outline reasons for rejecting the alternatives**

7.5.1 The alternative options were all considered by Council but ruled out for a number of reasons, namely because the other options either involved allocating strategic sites (Option 2, Option 3 and Option 5) where recent evidence showed there may be issues in these sites coming forward without various mitigation being required which could impact the viability and deliverability of these sites or would involve releasing sites outside of the urban area (Option 4). Each of these options resulted in a higher quantum of housing provision than that set out within the HEDNA evidence which supported the Preferred Options document.

**Table 7.2:** Summary of effects for the preferred options Local Plan

SA Topic	Overall effects	
1. Economic factors	Minor +ve effects	
2. Social factors	Moderate +ve effects	Minor -ve effects
3. Biodiversity	Neutral effects	
4. Population and human health	Moderate +ve effects	Minor -ve effects
5. Soil	Minor -ve effects	
6. Water	Minor +ve effects	
7. Air quality	Neutral effects	
8. Climatic factors	Major +ve effects ?	
9. Material assets	Minor +ve effects	
10. Cultural Heritage	Minor +ve effects	Minor -ve effects
11. Landscape	Minor +ve effects	



# 8. Reconsideration of Alternatives (Pre-submission stage)

## 8.1 Introduction

- 8.1.1 Following consultation at preferred options stage, the Council has undertaken further work to refine the spatial strategy. However, these changes have been relatively minor in terms of the site allocations proposed. It is in this respect that alternatives are considered at this latest stage.
- 8.1.2 In terms of housing quantum and distribution, a range of alternatives have already been tested at preferred options stage, and the findings remain relevant. The range of alternatives at this scale are therefore narrower in focus compared to those previous stages.
- 8.1.3 A change has been made in relation to the plan period, with a three year earlier starting period proposed (2021-2039 rather than 2024-2039). This is important in relation to the consideration of reasonable alternatives to housing delivery at this latest stage. The range of dwellings per annum (dpa) tested at preferred options stage was 646 dpa through to 712 dpa. Though the growth in the draft Plan is lower at 545 dpa, the overall quantum of new homes over the Plan period is very similar (9810 dwellings) to that proposed under the urban dispersal option (9,690 dwellings). It is appropriate to compare housing growth alternatives on a like for like basis, and therefore options have been reconsidered at this stage in terms of the overall amount of new housing delivered over the plan period.

## 8.2 Are there any further alternatives at this latest stage?

- 8.2.1 At the latest stage, the housing target has been identified through the bespoke report 'Towards a Housing Requirement for Nuneaton and Bedworth' (November 2022) prepared by Icenl. This report builds upon and compliments the sub-regional HEDNA prepared by Icenl to establish the housing and employment provision for the Borough which reflects the growth priorities of the Council.
- 8.2.2 In terms of alternative distributions of development at this scale of growth, the Council consider that there are no further strategic alternatives to test. A range of strategic options have already been tested at preferred options stage, as well as a range of reasonable site options.

### **Lower levels of housing supply**

- 8.2.3 Planning for a lower level of growth is considered to be unreasonable by the Council, as it would not meet the housing identified needs for the Borough under the alternative standard methodology projection. In particular, the Borough has a significant need for affordable housing and providing lower levels of housing supply would not assist in meeting this need.

- 8.2.4 There does not appear to be any special circumstances or overriding issues that would justify lower levels of housing delivery in Nuneaton and Bedworth than the proposed approach.

### **Higher levels of housing supply**

- 8.2.5 A range of higher growth scenarios have already been tested through the SA, and it is considered unnecessary to undertake further appraisals that involve additional Green Belt release. The reasons for this are as follows:

- The SA already tests higher levels of growth that involve further green belt release in a range of locations.
- There are no exceptional circumstances identified for the release of additional Green Belt land.

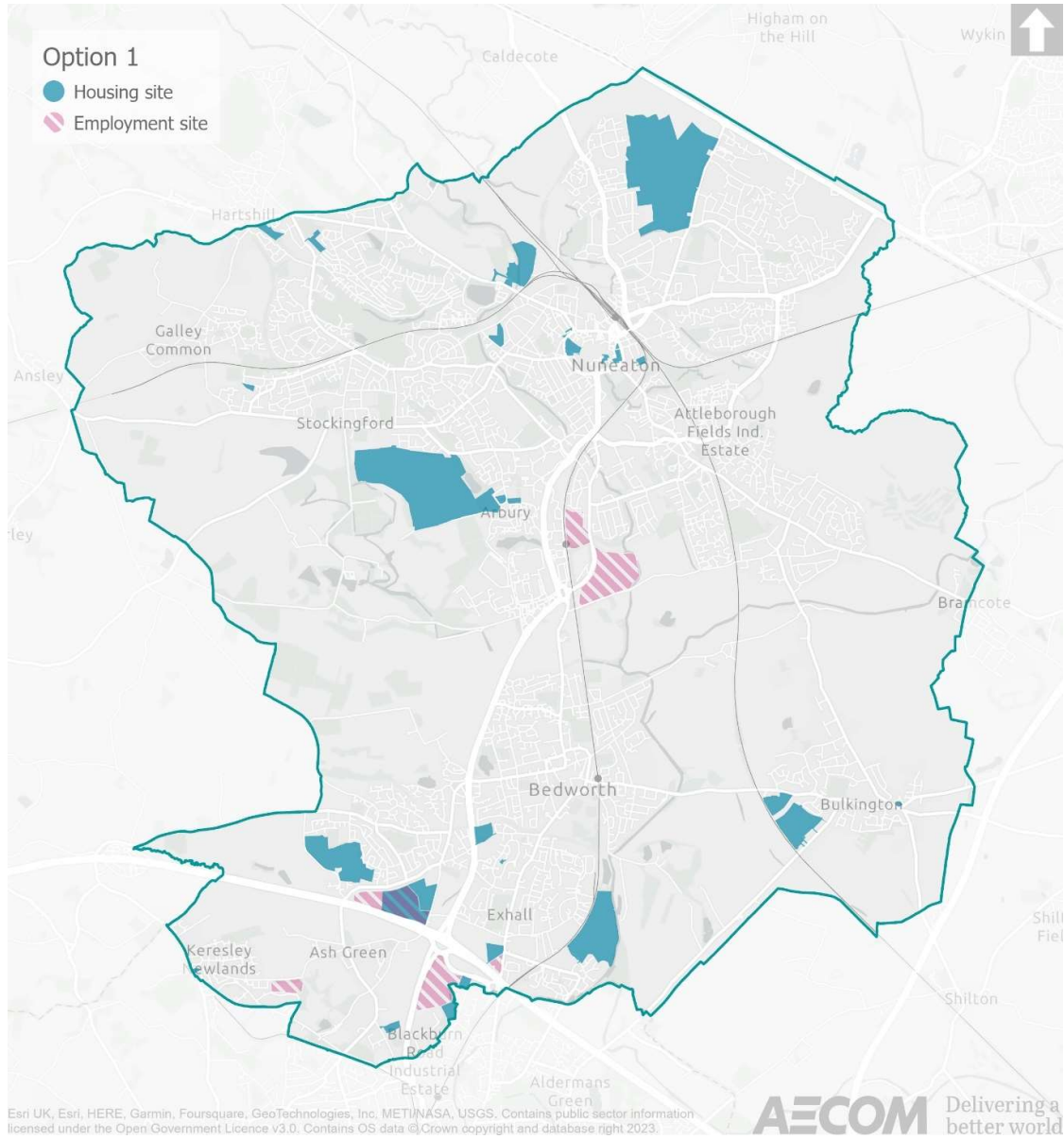
- 8.2.6 The draft Plan seeks to de-allocate two strategic sites that are allocated within the currently adopted Local Plan (Sites HSG4 and HSG7). The Council consider that these sites are not likely to form a reliable source of supply, but it is noted that there are planning applications submitted / developer interest in their release (whether partial or complete).

- 8.2.7 The Council have therefore considered whether it is a reasonable approach to retain these allocations. Whilst these sites would not be required to meet housing delivery, they could deliver additional flexibility in the longer term should circumstances change. Therefore it is considered that including these (alongside the proposed draft Plan strategy) would be a reasonable approach to test within the SA.

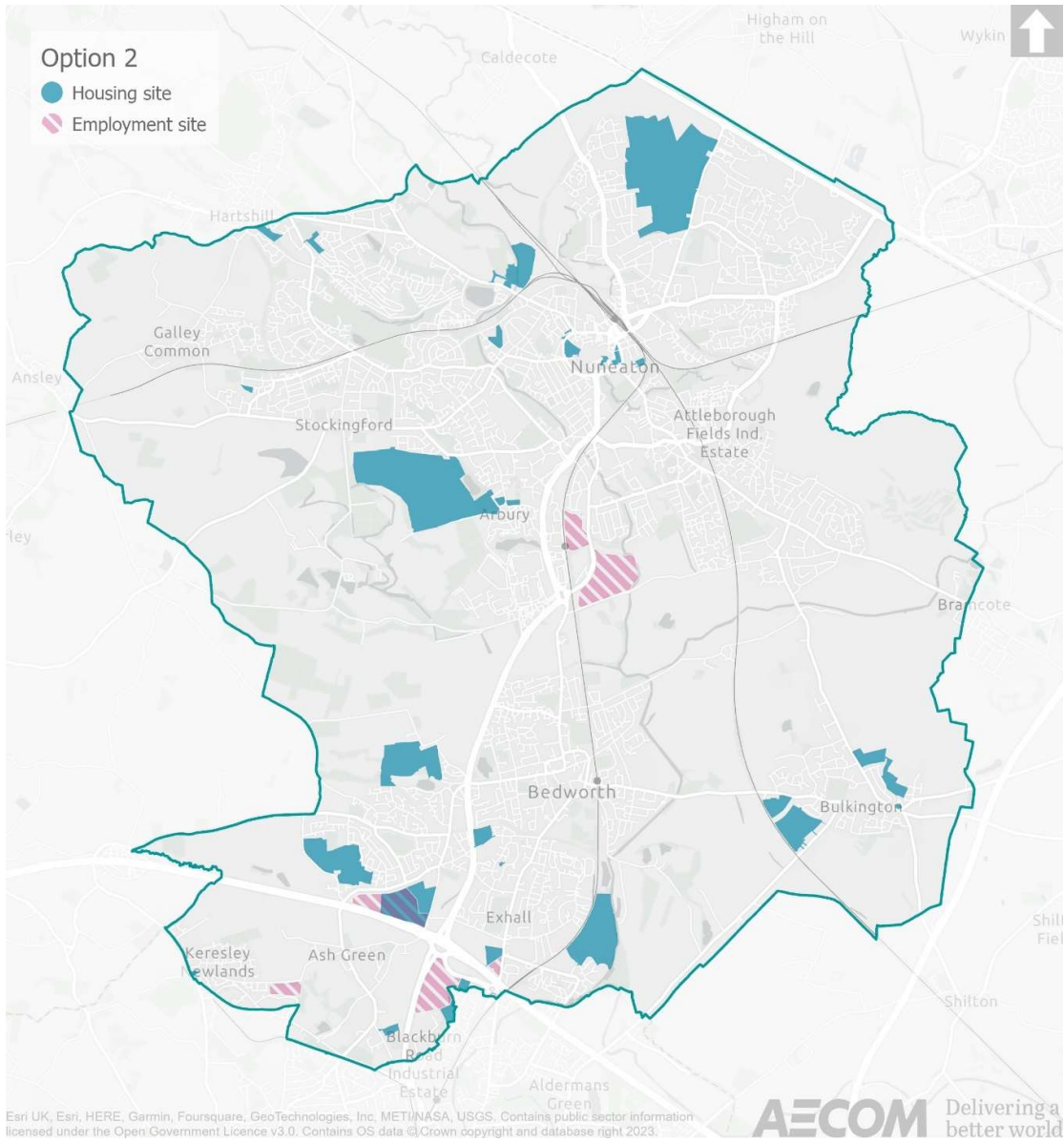
- 8.2.8 At this stage, therefore, the following two alternatives have been identified and tested within the SA. Section 10, presents the findings of the appraisal process at this stage.

1. The draft Plan ( as illustrated on Figure 8.1). The map shows the strategic and non-strategic allocations, the majority of which have been rolled-forward from the adopted Local Plan, with the addition of selected sites in the urban areas. The total quantum of development under this approach over the Plan period is 9,810 dwellings (which is slightly higher than the figure proposed at preferred options stage of 9,690). This is comprised of existing supply (committed development), the strategic and non-strategic site allocations.
2. The draft Plan plus existing allocations HSG4 and HSG7 (illustrated on Figure 8.2). This approach would retain all of the existing strategic housing allocations as well as identifying additional sites in the urban area that offer a different scale of development and range of choice. Given that there would be two additional sites, the overall scale of growth would be higher under this option compared to the draft Plan (i.e. any additional growth anticipated to come forward in the Plan period at HSG4 and HSG7).

**Figure 8.1 Option 1 - The draft Plan approach**



**Figure 8.2 Option 2 (The draft Plan plus HSG4 and HSG7)**



## 9. Appraisal of reasonable site options

- 9.1.1 To help inform the appraisal of strategic options as well as to aid the decision making process with regards to additional site allocations, a range of reasonable site options were identified by the Council and have been tested through the SA process.
- 9.1.2 The methodology for determining potential effects is provided at **Appendix B**. For some, criteria 'absolute' thresholds have been used to determine an appraisal score (with associated colouring in the matrix). For example, sites overlapping with designated biodiversity habitats are given a 'red' rating automatically.
- 9.1.3 For other criteria, relative scoring has been used to indicate how the site compares with all the other sites. For example, for access to services such as a General Practitioner (GP) surgery or a primary school, this scoring method has been employed.
- 9.1.4 In some instances, both absolute and relative methods have been used to assign a colour rating. For example, for flood risk, if there is no overlap with flood zones 2 or 3, then a 'green' rating is given automatically. For all sites which do overlap with either flood zone, site appraisals results have been colour coded, with those sites which are most at risk (in terms of area overlap) being shaded red and those least at risk shaded green. The precise colour is determined according to a continuous colour scale from red to green which aligns with flood risk in relation to other sites. Where there is overlap, if this is minimal, then the rating is very close to green, where there is considerable overlap, then it is closer to a 'red' rating.
- 9.1.5 The appraisal methods also took a two-step approach to assessing sites in relation to accessibility. Sites were assessed according to the straight-line distance to the nearest relevant assets, this insured that sites were considered fairly and consistently; however, this assessment fails to account for barriers and severance lines which may limit access. As such, sites were also considered in terms of accessibility along existing access routes from a determined point of access. In this approach, a network (relying on existing roads and paths) service area was established for each site, and the number of facilities was counted within this area. This is a useful metric to establish a 'walking distance' type of analysis and comprehension, though it may omit the potential for new/different site access points, paths and roads to be delivered and data relating to roads and paths may have some inaccuracies.
- 9.1.6 A Microsoft Excel spreadsheet has been prepared with information about each site and how they perform against the site appraisal criteria. The sheet is too large to display in a report and is more easily digested by interrogating the spreadsheet itself (which is **Appendix C** to this SA Report).

# 10. Appraisal of the Draft Plan

## 10.1 Background

10.1.1 The draft Plan (and reasonable alternatives) has been appraised in this section of the SA Report. The Plan has been appraised 'as a whole', taking into account the potential for effects associated with new development (primarily the new allocations) but accounting for all of the policies within the Plan. This is important for several reasons:

- Plan policies can help to mitigate negative effects and enhance positives.
- Policies within the Plan work together and can have cumulative/ synergistic effects that need to be identified within the SA.

10.1.2 Whilst all the policies have been considered individually, their effects are discussed in overall terms, rather than on a policy-by-policy basis. However, references have been made to specific policies where it is considered that they make a particular contribution to the SA topics.

10.1.3 In determining the significance of effects, professional judgement has been applied, being mindful of key effect characteristics including: magnitude, likelihood, duration, timeframe and cumulative effects. A range of information sources have been utilised to inform judgements:

- Geographical Information Systems data (which sets out a high level appraisal of each reasonable site option).
- Inputs from technical studies.
- Reference to the Scoping Report and Interim SA Reports.

10.1.4 Whilst every effort is taken to predict effects accurately, there is a degree of uncertainty that must be acknowledged given the strategic nature of the appraisal. In particular, the level of detail is less granular with regards to specific on site characteristics, so there is a reliance on higher level datasets (for example; the presence of designated environmental assets).

10.1.5 It is important to ensure a consistent comparison between the options. For this reason, the same high-level assumptions are made with regards to mitigation and enhancement. The policies within the Plan have been taken into account when determining the significance of effects for both options at this stage. However, rather than taking into account specific scheme details (which may be available for some locations and not others), the appraisal identifies the baseline situation and how development could affect this.

10.1.6 This is not to say that such effects could not be different when mitigation and enhancement considerations are fully appreciated.

## 10.2 SA Topic 1: Economic Factors

### Appraisal of the draft Plan

- 10.2.1 The proposed approach focuses additional residential development in existing, well connected, urban areas close to employment opportunities and services, and is therefore likely to attract business investment and workforce to the area producing favourable effects on economic growth within the Borough. Some of the additional residential sites, such as ARB1, EXH1 and EXH14 are in very close proximity to employment sites which is likely to make these locations attractive to both employers and workforce reducing the need to travel further afield to access employment opportunities.
- 10.2.2 In terms of residential and employment growth, the picture is similar to the adopted Plan. Several sites in the adopted plan have been 'de-allocated', which could mean that benefits in these locations for economic factors are no longer realised to the same extent. However, the additional sites identified for development in the Plan shift the emphasis to the inner urban areas, so benefits here (in areas in need of regeneration) would likely be greater.
- 10.2.3 The strategic employment allocations in the adopted Plan total 86.3ha of the 6 employment allocations in the Plan, EMP1 (Faultands) and EMP6 (Longford Road Bedworth) are under construction and will deliver 26 ha and 2 ha of employment land respectively. . Of these original allocations one site, EMP7, will now deliver approximately 19.9ha of employment land which leaves a total of 52.2 ha of the original site allocations still available for employment development. EMP2 has been partially reduced, with two parcels of land on the north eastern and south eastern edge no longer being allocated for employment uses. This will result in less positive effects in this location but this is offset somewhat by the fact that the land de-allocated for employment is now allocated for housing delivery. This could make the employment element of the site more attractive due to a nearby workforce alongside any public realm improvements associated with the housing delivery. The evidence base produced for the Borough Plan Review indicates there is an adequate supply of employment land in the Borough with the potential supply of 107ha exceeding the minimum need for 87.85ha of employment land up to 2024. Therefore, the strategic allocations in the adopted plan are sufficient to deliver the recently assessed employment land need.
- 10.2.4 The additional employment site allocation at siteABB7 and would provide further mixed use (employment/ residential). These are centrally located with respect to employment opportunities and services. Furthermore, the mixed-use sites are likely to create housing and employment opportunities due to increased footfall and benefits provided by existing infrastructure and amenities.
- 10.2.5 Policy BE3 (Sustainable design and construction) promotes placemaking and requires proposals to contribute to local distinctiveness and character of surrounding neighbourhoods.

- 10.2.6 The policy seeks sustainable new commercial development requiring these to meet BREEAM 'very good standard' where feasible.
- 10.2.7 This is likely to give businesses/ investors additional environmental credentials helping promote their image which is likely to attract investment into the area.
- 10.2.8 Policy E1 promotes accessibility to employment areas and measures to promote wider participation in the labour market, including by increasing skills and training, and delivering measures to reduce barriers to people entering the workforce. These factors ought to promote economic growth, attract investment and increase employment across the Borough.
- 10.2.9 Several other plan policies will continue to contribute positive effects to economic factors such as those that promote accessibility (Policy HS2), high quality environments (SA1 / NE1 / DS3 / BE3) and infrastructure provision (DS3 / HS1). Amendments to the Adopted Plan that are likely to bring about additional benefits relate to an increased focus on climate change resilience (DS3 / BE3) (which is positive for economic activity in the longer term) and specific mention of the need to support overnight lorry parking (beneficial for distribution activities).
- 10.2.10 Overall, the approach to employment is likely to have minor positive effects on economic factors. Whilst sufficient employment land is identified to meet needs, much of this is already allocated in the Adopted plan, so the effects are unlikely to be significant. That said, where additional / new mixed use and employment sites are identified in the urban areas, this should help to increase their attractiveness, increasing land values and helping to attract investment which will facilitate economic growth. There are also several policy improvements relating to climate change, training and overnight lorry parking that will have benefits for business activity.

### **Appraisal of reasonable alternatives**

#### Urban Dispersal Plus HSG4 / HSG7

- 10.2.11 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals.
- 10.2.12 This approach would also include the retained allocation of a strategic site for residential development at Bedworth Woodlands (HSG4) which is relatively close to the strategic employment sites south west of Bedworth with good access to the motorway network via the nearby A444. Therefore, this may help address some of accessibility (to employment sites) issues currently experienced in the Borough producing minor positive effects on employment.
- 10.2.13 A further strategic site would be retained at Bulkington East (HSG7), this site is more isolated from major employment opportunities and as such, would be unlikely to promote positive effects associated with housing and employment land being located in close proximity.



- 10.2.14 The effects of development associated with strategic growth at the Woodlands and Bulkington East may also not arise in a timely manner if no schemes come forward in these locations. Nevertheless, in combination with the additional positive effects associated with the strategy of urban regeneration, a higher delivery of housing could lead to greater positive effects compared to the proposed strategy (i.e. more construction jobs, more accommodation for a workforce etc).
- 10.2.15 On balance, minor positive effects are predicted (but relatively speaking, option performs better than the proposed plan in terms of economic factors).

**Appraisal summary table (Economic Factors)**

Reasonable alternative	Effects summary	Rank
1) Proposed approach (dispersal)	Minor +ve	2
2) Proposed approach plus strategic sites HSG4 / HSG7	Minor +ve	1

**10.3 SA Topic 2: Social Factors**

**Appraisal of the Draft Plan**

- 10.3.1 The adopted Nuneaton and Bedworth Borough Plan (NBBP) provides over 14,000 new dwellings or 703 dpa over the adopted Plan period (2011-2031). The Council’s Borough Plan monitoring report (2020/2021)<sup>3</sup> shows that 4,243 net dwellings had been completed since start of the adopted Plan period (2011) which leaves a further 9,917 dwellings to be completed over the 10 years 2021 to 2031 which is around 992 dpa. The report states that there were 601 completions during 2022/21 which indicates under delivery, though this may be partly attributable to the Covid-19 pandemic. In terms of affordable housing the report shows 20.6% of housing delivered in 2020/21 was affordable (rented and ownership tenures) which was 24% lower than the affordable housing delivered in the previous year but when provision is considered over the past 5 year period. Affordable housing delivery is on an upward trend.
- 10.3.2 The additional sites proposed for allocation mostly have relatively good access to local facilities, but a mixed performance in relation to public transport. However, the majority of the sites are adjacent, or in close proximity to, larger site allocations (strategic and non-strategic sites in the adopted Plan) where economies of scale may facilitate improved local facilities and enhance public transport. The additional growth concentrated in these areas could potentially facilitate improved infrastructure, services and public transport through the economies of scale generated. Sites EXH-14, KIN-2 and GAL-7 are less well connected to a clustering of existing services or strategic growth.

<sup>3</sup> [Nuneaton & Bedworth Borough Council Borough Plan Monitoring report \(2020-2021\)](#)

- 10.3.3 Whilst this could lead to some degree of isolation and consequential issues relating to lack of access to cultural, sports and recreation facilities, employment and training and any associated deprivation, these sites are small and so effects are likely to be minimal.
- 10.3.4 Two strategic sites have been proposed for 'de-allocation', including strategic sites at 'The Woodlands' and 'East of Bulkington'.
- 10.3.5 Benefits in terms of social infrastructure would not be realised at the Woodlands (as per existing policy HSG4), meaning that a new local school, open space improvements and other facilities would not be delivered. Likewise, financial contributions associated with East of Bulkington (as per existing policy HSG7) would not arise. In terms of social outcomes, the effects are therefore less positive in respect of these two locations in particular. Conversely, some residents may have had amenity concerns and the omission of these sites would resolve these. On balance, negative effects are predicted though in terms of social outcomes. Piecemeal development is considered less likely to deliver the same benefits as strategic growth.
- 10.3.6 The Borough has the highest levels of deprivation across Warwickshire ranking 101<sup>st</sup> most deprived local authority district nationally (out of 317)<sup>4</sup>. In this context some of the additional allocations such as KIN2, ABB5, ABB6, ABB7 and ABB8, fall within the most deprived neighbourhoods in the country and are likely to engender positive effects. The allocations will provide residents with more housing options including more affordable tenures with positive knock on effects on health and employment leading to improved living conditions and incomes.
- 10.3.7 Policy H2 (Affordable housing) is likely to have favourable effects as it seeks 25% affordable housing on plots of 15 or more dwellings or 2 units on schemes of 11-14 dwellings split 25% provided under the First Homes scheme and 75% social/affordable rents. The provision is required on the site of development. Policy HS2 (Strategic accessibility and sustainable transport) requires development to ensure adequate accessibility to all principal modes of transport and be well connected to strategic facilities and maximise sustainable transport achieving a 15% minimum modal shift.
- 10.3.8 Policy E1 seeks to ensure that applications relating to employment uses are accessible by a range of transport types as well as measures being put in place which increase the ability of those with mental or physical disabilities to participate in employment practices. Other considerations will be given to boost local skills and training opportunities and increase support networks to widen participation in labour markets. These factors are likely to induce positive effects.

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<sup>4</sup> Index of Multiple Deprivation (2019)

- 10.3.9 Policy HS6 (Sport and Exercise), which requires the retention or replacement of sports pitches is anticipated to support community integration, by providing spaces which facilitate sports, events and other activities which promote integration.
- 10.3.10 Policy TC3 (Hierarchy of Centres) seeks to ensure that residential development is sited within accessible locations which permit access to local or district centres by active means. This ought to promote sustainable travel behaviours and increased use of local facilities. A range of plan policies will continue to have benefits with regards to social factors, particularly those that support high quality design, environmental enhancements, retention, accessibility and improvement of community facilities.
- 10.3.11 In terms of amendments, the main benefits are likely to arise in relation to climate change resilience (which ought to have knock on benefits in terms of social factors).
- 10.3.12 Overall, mixed effects are predicted with regards to social factors. The additional allocations and policies seeking accessible affordable housing and integrated sustainable transport infrastructure are anticipated to have positive effects on social factors. The focus of development in deprived areas is also likely to create positive effects through provision of more housing choices, new infrastructure, attractive public realm, services and employment opportunities. Whilst some of the sites are currently in areas with limited accessibility, when these are considered along with existing plan allocations, the proposed overall growth is likely to facilitate improved infrastructure and services which would improve accessibility and connectivity. Together, these constitute moderate positive effects.
- 10.3.13 Where strategic sites have been removed from the adopted Plan, the social benefits that would have arisen in these locations will no longer arise. In this respect, minor negative effects are predicted. Existing communities might not benefit from new facilities, but ought not to see a major change for the worse.

### **Appraisal of reasonable alternatives**

#### Urban Dispersal Plus HSG4 / HSG7

- 10.3.14 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals.
- 10.3.15 Two existing strategic allocations will be rolled forward into the Plan, including sites at 'The Woodlands' and 'East of Bulkington'. Benefits in terms of social infrastructure would be seen at the Woodlands (as per existing policy HSG4), meaning that a new local school, open space improvements and other facilities would be expected to be delivered. Likewise, financial contributions associated with East of Bulkington (as per existing policy HSG7) would be seen. In terms of social outcomes, the effects are therefore more positive in respect of these two locations in particular.

10.3.16 That said, these are existing allocations, so they would not be expected to deliver additional effects to the baseline position. This strategy would however avoid the potential negative effects associated with their de-allocation. Overall, this would be likely to result in moderate positive effects.

**Appraisal summary table (Social Factors)**

Reasonable alternative	Effects summary		Rank
1) Proposed approach (dispersal)	Mod +ve	Minor -ve	2
2) Proposed approach plus strategic sites HSG4 / HSG7	Mod +ve		1

## 10.4 SA Topic 3: Biodiversity

### Appraisal of the Draft Plan

- 10.4.1 The Borough supports a range of species and habitats. In terms of designated biodiversity sites; there is one European site (Ensor's Pool Special Area of Conservation SAC), two Sites of Special Scientific Interest (SSSI) (Ensor's Pool and Griff Hill Quarry), extensive amounts of land designated as Local Wildlife Sites (LWS), some areas of ancient woodland (found in the western side of the Borough), three Local Nature Reserves (LNR) (Galley Common, Ensor's Pool and Bedworth Sloughs) and areas and specific trees which are protected with Tree Preservation Orders.
- 10.4.2 In terms of the SAC, SSSI and LNR at Ensor's Pool, site ARB-1 is within relatively close proximity. This could give rise to short-term effects relating to any nearby construction related activities. Flows of contaminated water would have potentially more pronounced effects on this site, due to the importance of the water-based ecosystems at Ensor's Pool. Further and more sustained, longer-term effects could be realised from recreational pressures. Due to the small scale of site ARB1 more significant effects are considered unlikely to occur.
- 10.4.3 The residential development site at Kingswood Road (KIN2) is located adjacent to Galley Common LNR as well as an area covered by a Tree Preservation Order and some ancient woodland. The nature reserve represents an easily accessible natural area noted as being particularly beneficial for education<sup>5</sup>. The proposed housing in this location is adjacent to the LNR which may produce additional disturbance pressures on ecology within the LNR. However, the site is relatively small and the magnitude of effects is likely to be limited (particularly when taking account of plan policies that seek to protect, mitigate and enhance biodiversity).
- 10.4.4 In terms of Local Wildlife Sites (LWS) across the Borough, GAL-7 and ARB-1 overlap with designated sites, with numerous other sites sitting adjacent. Precise effects are likely to depend upon the nature of development and the specific sensitivities of flora and fauna on the wildlife sites. In a general sense, negative effects would be expected, largely relating to air, noise and light pollution linked to human habitation (and pets), construction relation disruption as well as potential negative effects linked to increased recreation in and around the LWSs. Where some sites will be deallocated in the Plan, previously identified effects on LWS would not be likely to arise, which is anticipated for sites CAM-1 and BED-3.
- 10.4.5 Employment sites in the Nuneaton with Bedworth Local Plan remain mostly unchanged from the previous Local Plan, and as such, no effects are predicted. EMP2 is slightly reduced in scale, with two small parcels of land instead allocated for housing (EXH-6).

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<sup>5</sup> TEP report: Nuneaton and Bedworth Landscape Character Assessment

- 10.4.6 The change of use of proposed use for this small area of this land may potentially reduce impact on the adjacent Bassford Bridge Meadow LWS due to the potential for residential uses to be more sensitive to local biodiversity sensitivities, though, this is uncertain.
- 10.4.7 There are several tree preservation orders in the vicinity of proposed residential, mixed and employment sites across Nuneaton and Bedworth, though for the most part any overlap is minor and such development would be expected to come forward in a sensitive way which protects the trees.
- 10.4.8 Site ABB-4 is entirely overlapping with a TPO and as such negative effects would be expected in this location, relating to the complete, or total loss of trees which have value in terms of biodiversity as well as community and amenity. However, the site has resolution to grant planning permission, and is previously developed land. It is therefore unlikely that effects would be significant. Nevertheless, it would be helpful to specify within a site specific clause that development should seek to avoid any loss of TPOs.
- 10.4.9 There are also some local features on allocated sites such as trees, hedgerows and watercourses where development sites could lead to some disturbance. Detail has been added to the strategic site policies in relation to the need to retain and enhance hedgerows, which ought to ensure that negative effects are avoided and positives encouraged. The same is also true in terms of encouraging woodland planting.
- 10.4.10 GAL7 is adjacent to a 'destination park', and contains habitat on the edge of the site boundary associated with Bar Pool Brook. There are no designated habitats, but there is potential for some minor negative effects in terms of increased disturbance from residential development.
- 10.4.11 Further detail to Policy SHA3 (Land at Tuttle Hill (Judkins Quarry)) which requires the development to ensure that light (or other) pollution from the site does not adversely affect wildlife along the adjacent canal corridor is anticipated to promote positive effects in relation to biodiversity. Similar effects are likely to be seen where policy SHA6 (Land at former Hawkesbury Golf Course) is required to provide a development buffer between the site and the adjacent canal. Policy SEA6 requires development to protect and enhance the network of hedgerows and trees on the site, promoting positive outcomes.
- 10.4.12 The proposed approach no longer involves development on two strategic sites within the current adopted plan (i.e. East of Bulkington and Woodlands). Whilst neither of these sites are nearby to designated wildlife sites, they are both greenfield and do contain local features such as hedgerows, trees and water courses. No longer developing these areas is therefore likely to lead to slightly less negative effects compared to the adopted local plan.
- 10.4.13 In terms of the Borough Plan Review policies; NE3 (Biodiversity and geodiversity) seeks to conserve ecological networks and services including locally designated biodiversity sites.

- 10.4.14 Where adverse impacts are likely, a mitigation strategy to halt and reverse biodiversity loss and achieve a minimum 10% net gains, would be required.
- 10.4.15 DS1 (Presumption in favour of suitable development) supports environmental protection, the planting of trees and orchards. Policy DS3 (Development principles) requires all new development to be sustainable and to provide environmental mitigation and enhancement. The policy includes reference to the ten characteristics of the National Design Guide which includes the requirement to: prioritise nature so that diverse ecosystems can flourish and to support and enhance biodiversity (Nature enhanced and optimised characteristic).
- 10.4.16 Policy HS2 (Strategic Accessibility and Sustainable Transport) addresses the transport implications of new development, requiring these demonstrate suitable demand management measures, maximise connectivity to strategic facilities and maximise sustainable transport options including walking and cycling. The policy sets a target of 15% (minimum) modal shift to non-car uses. Policy BE3 (Sustainable design and construction) requires development proposals to include the provision of trees and promote sustainable transport.
- 10.4.17 Policy BE2 (Renewable and Low Carbon Energy) balances the need for wind turbines and their ability to generate clean energy, with their environmental impacts, including on flora and fauna. This might reduce the potential for renewable energy generating schemes to cause significant harm to biodiversity.
- 10.4.18 When considered on their own, the new site allocations are not expected to give rise to significant effects on biodiversity. However, given the cumulative growth proposed at strategic level, negative effects are possible in terms of disturbance to local wildlife by various means. The effects will likely be moderated by Plan policies seeking to conserve and enhance biodiversity, and are also offset to an extent by the de-allocation of two strategic sites. Therefore, residual effects would likely be neutral.
- 10.4.19 Where biodiversity net gains are achieved, longer term effects would be positive. Given that the majority of sites are unlikely to have a high biodiversity value as a starting point, it is considered that net gain ought to be possible to achieve on most of the sites themselves. The smaller scale nature of the sites could mean that strategic opportunities for net gain are more limited though. There is a degree of uncertainty surrounding the longer-term effects relating to net-gain, but at least 10% ought to be achieved given that it is due to become a legal requirement. There are some additional policy measures introduced through the Plan review that seek to ensure that biodiversity is enhanced and that local features such as trees, hedgerows and ponds are incorporated into new development (both on the strategic sites and for windfall / general development).

## Appraisal of reasonable alternatives

### Urban Dispersal Plus HSG4 / HSG7

- 10.4.20 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals.
- 10.4.21 The two strategic sites that are currently adopted (HSG4 and 7) would continue to be supported, and as such neutral effects would be expected to be seen. There are no major biodiversity constraints on these sites. Taking account of the Plan policies and the principle of net-gain, the position in the longer term could be positive if net gains are achieved on these additional strategic sites and non-protected habitats which are present are not negatively impacted. There is a degree of uncertainty surrounding the longer-term effects relating to net-gain.

### Appraisal summary table (Biodiversity)

Reasonable alternative	Effects summary	Rank
1) Proposed approach (dispersal)	Minor +ve	1
2) Proposed approach plus strategic sites HSG4 / HSG7	Minor +ve	2

## 10.5 SA Topic 4: Population and Human Health

### Appraisal of the Draft Plan

- 10.5.1 Nuneaton and Bedworth has the highest levels of deprivation across Warwickshire, ranking 101<sup>st</sup> most deprived local authority district<sup>6</sup> nationally (out of 317). Several of the additional residential site allocations (KIN2, ABB5, ABB6, ABB7 and ABB8) fall within deprived areas (amongst the 10% most deprived in the country). Allocating new dwellings here has the potential to provide additional affordable housing that is accessible and well located with respect to services, education and employment opportunities. Residents in deprived areas can often be prevented from accessing suitable housing options so providing additional well designed housing in such locations can provide residents with more housing options including more affordable tenures with positive knock on effects on health and employment leading to improved living conditions and incomes.
- 10.5.2 With regards to accessibility, all of the sites with the exception of EXH-14, KIN-2 and GAL-7 are within broadly close proximity of a range of services and facilities. This should enable and encourage active modes of travel, which are positive in terms of health and wellbeing. Plan policies seeking provision of accessible cycle routes, footways and on-site bus infrastructure and allocating sites for mixed residential and employment uses should also help in this respect.

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<sup>6</sup> [Indices of deprivation 2019](#)



- 10.5.3 Several additional proposed sites are intercepted by Public Rights of Way (PRoW) (EXH-1 and GAL-7) as well as others which are adjacent to such routes which could potentially lead to the loss of paths. That said, this is very unlikely due to national and local planning policy which seeks the protection and enhancement of public rights of way.
- 10.5.4 Further protection may be seen, where policy SA1 and BE3 requires new development to comply with Building for a Healthy Life principles which promote the integration of walking, cycling, public transport, and green and blue infrastructure into new development leading to beneficial effects on physical and mental wellbeing. Further protection for ProWs is provided through Policy SA1 (development principles on strategic sites) which seeks to protect existing ProWs stating that these should be incorporated into new development wherever possible. The policy also promotes accessible new community, sport, physical activity and play facilities.
- 10.5.5 Policies for the strategic growth sites across the Borough have added detail relating to the provision of improved accessibility and sports and recreation facilities; this ought to lead to more positive outcomes in terms of provision and therefore promote positive physical and mental health outcomes.
- 10.5.6 Two strategic sites have been proposed for 'de-allocation', including strategic sites at 'The Woodlands' and 'East of Bulkington'. Both sites would have been expected to deliver infrastructure such as walking and cycling routes and green spaces which would have aided both mental and physical health outcomes. Both sites are also close, or provide easy access routes to existing community parks. The lost potential for additional services and community infrastructures which, delivered and associated with strategic housing growth, could have led to positive outcomes for future residents as well as communities in the surrounding areas. As such, the de-allocation of these strategic sites reduces the potential for enhanced positive effects.
- 10.5.7 Policies H1 (Range and mix of housing) and H2 (Affordable housing) seek to provide an appropriate mix of housing types, sizes and tenures (including intermediate tenures and social/ affordable rents) to meet assessed needs over the Plan period. This is to include housing suited for older people such as, extra care and residential care homes. These would be required to comply with accessibility standards; M4(3) building regulations or higher. The policy is predicted to have positive effects on health and wellbeing as it is likely to allow residents to continue living near to their current homes, friends and family and to lead more independent lives for longer. Policy H4 (Nationally Described Space Standards) seeks to ensure that new residential development delivers enough private outdoor space, helping to promote positive physical and mental health outcomes.
- 10.5.8 Policy H5 (Accessible and Adaptable Homes) ensures that new major residential developments should meet at least standards M4(2) of the Building Regulations (related to accessible and adaptable homes), with 5% of new dwellings being required to meet the more throughout standards of M4(3).

- 10.5.9 This ought to ensure those who have disabilities or are less able have appropriate housing which meets their needs, including where those needs develop over time; as such, positive effects are likely.
- 10.5.10 Policy BE3 (Sustainable design and construction) seeks to provide safe, inclusive, accessible and healthy environments for all through placemaking strategies and adherence to the National Model Design Codes' ten characteristics. The latter promote attractive/ distinctive and accessible design, safe, social and inclusive public spaces and healthy, functional homes. Policy TC3's requirement for residential development to be accessible by active means to a district or local centre ought to promote active lifestyles, with positive mental and physical health outcomes. Further health benefits are anticipated from the active lifestyles promoted through Policy HS6 (Sport and Exercise)'s which requires the retention or replacement of sports pitches.
- 10.5.11 Mixed effects are anticipated overall, the regeneration of deprived areas and policies seeking well designed, accessible homes of varied types and tenures (including affordable homes) along with policies seeking provision of green/ blue infrastructure and sustainable transport, are likely to produce positive effects on population and human health. The additional sites proposed for allocation are generally well located and should have good access to health facilities and other services (by active modes of travel). In combination, moderate positive effects are predicted.
- 10.5.12 On the other hand, the de-allocation of two strategic sites is expected to result these locations not benefiting from a range of services and infrastructures which could have served to improve physical and mental health outcomes. As such, minor negative effects are predicted overall.

### **Appraisal of reasonable alternatives**

#### Urban Dispersal Plus HSG4 / HSG7

- 10.5.13 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals.
- 10.5.14 The retention of these two sites would be expected to result in positive effects due to the potential for additional services and community infrastructures which, delivered and associated with strategic housing growth, could lead to positive outcomes. That said these sites already form a component of the spatial strategy for the area, and so effects would be expected to be seen regardless. Some uncertainty may be seen, as the sites have not seen development since allocation in the current Plan. However, the negative effects discussed for the proposed Plan would be more likely to be avoided. As such, moderate positive effects are predicted.

### Appraisal summary table (Population and Human Health)

Reasonable alternative	Effects summary		Rank
1) Proposed approach (dispersal)	Moderate +ve	Minor -ve	2
2) Proposed approach plus strategic sites HSG4 / HSG7	Moderate +ve		1

## 10.6 SA Topic 5: Soil

### Appraisal of the Draft Plan

- 10.6.1 Additional sites allocated in the Local Plan will not lead to further loss of Best and Most Versatile Agricultural Land because the additional land is classified as Urban, and as such is not suitable for agricultural purposes.
- 10.6.2 Positive effects are predicted through the remediation of brownfield sites (KIN-2, EXH-14, ARB-1, ARB-8, ABB-7, ABB-6, ABB-5 and ABB-4) which may have potential specific contamination issues that would need to be resolved to permit development.
- 10.6.3 Furthermore, strategic sites ‘the Woodlands’ and ‘East of Bulkington’ are proposed to be de-allocated, which reduces the likely loss of soil resources that would have occurred here (approximately 40ha of grade 3 land). There is a degree of uncertainty due to a lack of survey work on these sites which details whether this land is classified as Grade 3a or 3b. Nevertheless, the protection of a significant quantity of greenfield land is positive in terms of soil resources.
- 10.6.4 Policy DS3 is likely to have favourable effects on preserving BVM agricultural land as it prioritises previously developed and underutilised land for new development. The policy also limits development outside settlement boundaries to agricultural, forestry and leisure uses.
- 10.6.5 In conclusion, the de-allocation of strategic sites which contain agricultural land and would mean that the residual position is one of less soil resources being affected. The promotion of growth on sites which are less appropriate for agricultural development, do not contain soil resources and could help to remediate contamination ought to lead to positive effects. Furthermore, there are several plan policies that prioritise previously developed land, including the remediation of potentially contaminated sites. Consequently, moderately positive effects are predicted overall.
- 10.6.6 Allocated sites that contain agricultural land ought to be surveyed prior to development to confirm which contain best and most versatile land (if any). Where resources are identified, they should be avoided and preserved as much as possible (presuming there are parts of the sites that are of a lower quality).

10.6.7 It is acknowledged this may be difficult given the small scale of the sites involved, but perhaps community allotments or gardens could be introduced.

**Appraisal of reasonable alternatives**

Urban Dispersal Plus HSG4 / HSG7

10.6.8 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals.

10.6.9 This approach would still direct development at new allocated sites away from important soil resources, and would encourage / enable remediation in some locations. These are positive effects with regards to soil as discussed above. However, the situation would remain the same with regards to the potential loss of BMV agricultural land at existing allocated strategic sites (HSG4 and HSG7) . There is an element of uncertainty given that development in these locations has not been forthcoming (i.e. this could lead to speculative development elsewhere on higher grades of agricultural land). As a result, the overall effects are predicted to be minor positive rather than moderately positive.

**Appraisal summary table (Soil)**

Reasonable alternative	Effects summary	Rank
1) Proposed approach (dispersal)	Moderate +ve	1
2) Proposed approach plus strategic sites HSG4 / HSG7	Minor positive?	2

## 10.7 SA Topic 6: Water

### Appraisal of the Draft Plan

- 10.7.1 The majority of new proposed site allocations are in areas of low flood risk (Flood Zone 1) and therefore the potential for pollution issues associated with flooding are considered to be limited in this respect. Where sites are within Flood Zones 2 and 3 (for example ABB-4, EXH-1, ABB-7 and ABB-6) the potential for pollution during a flood event is higher. This can serve to exacerbate issues related to flooding and water quality, however several plan policies should help to mitigate negative effects. This includes policies that seek to improve resilience to climate change and to implement green infrastructure (i.e. policies DS1, DS3, SA1 and BE3). Policies NE1 and NE4 will also be important as they require the incorporation of sustainable drainage (SuDS) systems to manage surface water run-off, and there are likely to be knock-on benefits with regards to water quality. Policy NE4 also ensures that developments do not adversely affect waterbodies, groundwater and surface water quality, with particular encouragement for the separation of surface and foul water.
- 10.7.2 In terms of drainage and topography, the majority of new sites are located in positions which are likely to lead to natural drainage patterns which flow into watercourses which are currently classified as being of a moderate class (Water Framework Directive, 2019). Whilst these watercourses are in a more favourable condition than others in the area, additional pollution could lead to this status being downgraded without sufficient mitigation. Effects in this respect might be likely to be more pronounced in the short-term construction phases. On balance, neutral effects are predicted in the longer-term when factoring in the need for sustainable drainage and appropriate waste water treatment.
- 10.7.3 The deallocation of the sites 'the Woodlands' and 'East of Bulkington' reduces the likelihood of construction related pollution of watercourses; this is most pronounced at the Woodlands site, which runs adjacent to a watercourse. The de-allocation of these sites is also likely to reduce potential pressure on the wastewater treatment systems in the area. Some positive effects may have been seen as a result of these sites coming forward (i.e. reduced pollution from agricultural practices, and the potential for the introduction of sustainable drainage networks). Therefore, on balance, neutral effects are predicted as a result of the de-allocation of these sites.
- 10.7.4 None of the proposed additional sites fall within groundwater source protection zones, and therefore in this respect, neutral effects are predicted in terms of groundwater quality. Likewise, development at such sites is considered unlikely to lead to direct pollutant run-off into watercourses (the majority of sites are distant from watercourses).
- 10.7.5 In terms of wastewater treatment, the location of newly identified sites in the urban area in a dispersed manner (and the relatively low total amount of new homes) should mean that existing facilities can accommodate growth without significant negative effects on water quality.

- 10.7.6 The dwellings per annum in the Publication Plan is actually lower than the current adopted Plan, and so in this respect there ought to be limited pressures on wastewater infrastructure as a result of the Plan review.
- 10.7.7 Policy SA1 seeks to protect existing watercourses and drainage channels, which is likely to reduce flood risk and help to mitigate potential water contamination related issues. Policy BE3 is likely to have minor positive effects in terms of conserving water resources as it calls for development to include rainwater harvesting and to maximise water efficiency so that it meets the higher standard for buildings regulations with regards to water efficiency (110 litres/person per day).
- 10.7.8 Overall, the publication Plan is predicted to have mostly neutral effects with regards to water quality, but some improvements in policy requirements relating to water efficiency mean that **minor positive effects** could arise in the longer term. The de-allocation of two large sites is also likely to reduce pressure on waste water networks, which could be an improvement upon the existing situation.

**Appraisal of reasonable alternatives**

Urban Dispersal Plus HSG4 / HSG7

- 10.7.9 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals.
- 10.7.10 The inclusion of these sites may result in some increased pressures on the wastewater treatment system as well as potential for increased pollution of watercourses (especially during construction phases). Conversely, the removal of this land from agricultural uses could reduce fertiliser derived sources of pollution of watercourses. On balance, it is considered more likely water quality would be adversely affected with the inclusion of these site allocations. However, the benefits discussed above for the proposed Plan approach would also still arise given the presence of policies seeking to protect and improve water quality and efficiency of use. Therefore overall, minor positive effects are still predicted (though comparatively speaking, the proposed Plan is ranked most preferable with regards to water quality).

**Appraisal summary table (Water)**

Reasonable alternative	Effects summary	Rank
1) Proposed approach (dispersal)	Minor +ve	1
2) Proposed approach plus strategic sites HSG4 / HSG7	Minor +ve	2

## **10.8 SA Topic 7: Air**

### **Appraisal of the draft Plan**

- 10.8.1 The majority of growth proposed in the Plan is already committed or allocated in the adopted Plan. Therefore, additional effects in terms of air quality are not likely to be major given the scale and spread of new development proposed. Furthermore, the majority of new homes will be well-located with regards to public transport. Given that the majority of sites are also within the urban areas, this should enable and encourage active forms of travel such as walking and cycling. The rate of car trips associated with new development in the urban areas of Nuneaton is therefore considered unlikely to lead to significant effects on air quality. However, some residential development will be in relatively close proximity to existing areas of poor air quality, and could contribute additional pressures as well as exposing residents to poor air quality. Sites GAL-7, KIN-2 and EXH-14 are considered to be less accessible than the other additional sites, and so car dependencies may be slightly elevated at these sites, potentially exacerbating air quality issues. However, due to the small scale of these sites, effects are unlikely to be significant.
- 10.8.2 The Borough has two air quality management areas (AQMA) these are located at Leicester Road Gyratory and at Central Avenue/ Midland Road in Nuneaton. Sites ABB4, ABB6, ABB7 and ABB8 are within close proximity to existing AQMAs in the Borough. Further to this, EXH-14 and EXH-6 are both adjacent to the Coventry-wide AQMA, and therefore potentially negative effects are likely in terms of additional pressures and exposure.
- 10.8.3 The Plan de-allocates two strategic sites at The Woodlands and East of Bulkington. Mixed effects would be expected as a result of this, with less pressure being put on the local road network, congestion-driven air pollution issues ought to be less pronounced. Conversely, improvements in terms of provisions of local facilities and sustainable transport services and infrastructures would not be delivered, reducing the potential improvements to local accessibility which could serve to reduce car dependencies and consequential air pollution from both the site and nearby existing residents.
- 10.8.4 Several Plan policies should help to mitigate negative effects with regards to air quality.
- 10.8.5 DS3 (development principles) is likely to have favourable impacts on air quality as it requires all development to be sustainable and contribute to net zero carbon emissions targets. The policy limits development in more remote locations (outside settlement boundaries) to agricultural, forestry and leisure uses which should help ensure residential development is confined to accessible locations close to services and employment.

- 10.8.6 Similarly, Policy SA1 (development principles on strategic sites) is positive as it encourages sustainable travel such as walking and cycling by promoting the integration of public rights of way, pedestrian and cycle links into green/open space networks and the wider area and the provision of cycle parking.
- 10.8.7 Policy HS1 (Ensuring the delivery of infrastructure) promotes the provision of infrastructure to address new development needs. Whilst the policy requires development to demonstrate how it addresses carbon neutral emissions by 2050 it also supports provision of overnight lorry parking therefore it's likely to produce mixed effects (positive and negative).
- 10.8.8 Policy HS2 (Strategic accessibility and sustainable transport) is positive as it requires development proposals to address accessibility to all modes of transport to drive carbon neutrality, demand management measures, provision of EV charging points, connectivity and maximisation of sustainable transport options. Proposals are required to target 15% modal shift to non-car based travel as a minimum. Similarly, policy BE3 (sustainable design and construction) promotes sustainable transport.
- 10.8.9 Policy HS2 addresses issues such as air quality requiring proposals to consider cumulative impacts and ensure they do not exacerbate air quality issues including measures such as EV charging points and dust management plans. The policy calls for maximising sustainable transport, setting a modal shift target of 15% as a minimum.
- 10.8.10 Policy TC3's requirement for residential development to be accessible by active means to a district or local centre ought to promote sustainable travel behaviours, potentially helping to reduce air pollution.
- 10.8.11 A range of policies that seek to improve the natural environment and green infrastructure are also likely to be beneficial in terms of air quality as green infrastructure can help to mitigate air pollution and to encourage sustainable travel.
- 10.8.12 Together, the Plan policies are likely to have a positive effect on air quality, and there is a greater emphasis on carbon neutrality in the publication version (compared to the existing Adopted Plan). Therefore, it is considered likely that efforts to address air quality will be enhanced (both indirectly and directly) as a result of the Plan. Offsetting these benefits is the fact that additional development is proposed in the urban areas, close to air quality management areas. This could bring about some minor negative effects in these particular areas. The magnitude of effects is likely to be limited though, and so overall, the positive effects of Plan policies ought to leave a residual neutral effect in terms of air quality.
- 10.8.13 The Plan policies are generally positive promoting sustainable transport and carbon neutrality by 2050, and the scale of new growth proposed in the urban areas is unlikely to lead to significant increases in traffic and congestion.



- 10.8.14 Negative effects are likely to be minimised as a result of the Borough’s spatial strategy which focuses residential and employment growth within accessible, existing urban areas; furthermore, longer term effects may be mitigated due to the anticipated increase in the take-up of electric vehicles.
- 10.8.15 Where residual negative effects arise in specific locations, these could be further mitigated through the implementation of low emission zones in areas of poor air quality (AQMA’s), low-traffic neighbourhoods and car free developments in such areas where feasible.

**Appraisal of reasonable alternatives**

Urban Dispersal Plus HSG4 / HSG7

- 10.8.16 These strategic sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals.
- 10.8.17 These sites would be expected to deliver new/improved facilities alongside sustainable transport services and infrastructures, serving to potentially reduce car dependency rates and lessen the impact of private vehicle use on air pollution. Conversely, due to behavioural norms relating to modal choice, the large growth in both areas would be likely to increase overall traffic volumes on the road network, serving to potentially contribute towards air quality issues. That said, these sites are existing allocations, and as such, effects from their continued inclusion would be neutral (including when being considered alongside the proposed spatial strategy).

**Appraisal summary table (Air Quality)**

Reasonable alternative	Effects summary	Rank
1) Proposed approach (dispersal)	Neutral	-
2) Proposed approach plus strategic sites HSG4 / HSG7	Neutral	-

**10.9 SA Topic 8: Climatic Factors**

**Appraisal of the Draft Plan**

- 10.9.1 New housing growth is allocated in mostly well-located sites within existing built-up areas with good access to public transport, employment and services. This should facilitate more sustainable travel behaviours, engendering positive effects on climate change mitigation as it serves to reduce the number and duration of car journeys and helps to promote a modal shift. Where sites are less accessible, they are of a small scale and as such, effects would be expected to be minor.
- 10.9.2 With regards to emissions from the built environment, the additional sites allocated in the Plan are unlikely to present opportunities for district energy schemes (given their relatively small scale).

- 10.9.3 However, it is likely that they will be built to higher standards of design given the enhanced emphasis on climate change in the Plan.
- 10.9.4 The additional allocations are not of a suitable scale to support significant tree planting, other sequestration measures or large-scale energy generation schemes on site and as such, effects in terms of carbon reduction or renewable energy generation schemes are expected to be minimal. The removal of two strategic areas of growth (SLO-10 and BUL-7) might further reduce the potential for these carbon reduction measures.
- 10.9.5 There is a stronger emphasis on climate change throughout the amended Plan, with additional clauses added to several policies encouraging or requiring the use of sustainable materials and contributing to carbon neutrality.
- 10.9.6 Policy DS1 requires development to address issues such as the use / safeguarding of natural resources, adaptation to climate change and to a net zero economy, including the planting of trees and orchards.
- 10.9.7 Policy DS3 supports the utilisation of previously developed land and the bringing back into use of underutilised buildings. The latter serves to conserve land resources (e.g. greenfield, open space and agricultural land) and recycle embedded carbon within existing buildings through re-use/adaptation. Home working is also promoted within the policy which should reduce the need to travel to work. Additionally, the policy requires that development complies with the Building for a Healthy Life<sup>7</sup> design toolkit which comprises 12 principles including the integration of walking, cycling and public transport within neighbourhoods, cycle and green and blue infrastructure. The implementation of these principles within new development is likely to reduce reliance on private cars and facilitate modal shift.
- 10.9.8 SA1 clause 13 states that 'new proposals will need to ensure that development includes fundamental mitigation for climate change, carbon reduction leading to neutral emissions by 2050 and for a nature recovery strategy'. This is reiterated in policies H1 (Range of and mix of housing) and HS1 (Ensuring the delivery of infrastructure). These changes are likely to improve the performance of the rolled forward strategic site allocations in terms of climate change mitigation (as well as any further development sites that come forward).
- 10.9.9 Policy HS2 (strategic accessibility and sustainable transport) promotes sustainable modes of transport requiring proposals to address accessibility to all modes of transport including demand management measures and maximisation of sustainable transport options to achieve 15% modal shift to non-car based uses. Policy TC3's requirement for residential development to be accessible by active means to a district or local centre ought to promote sustainable travel behaviours, potentially helping to reduce transport derived CO2 emissions.

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<sup>7</sup> [Building for a Healthy Life](#)

- 10.9.10 Policies BE3 and BE4 seek to conserve non-renewable resources, requiring development to minimise the use of non-renewable resources and waste. Proposals are also required to install rainwater harvesting systems, integrate passive solar design, minimise air, noise, soil and light pollution.
- 10.9.11 Non domestic development is required to meet the Building Research Establishment's Environment Assessment Method (BREEAM) where feasible.
- 10.9.12 Policy BE2 (Renewable and Low Carbon Energy) balances the need for wind turbines and their ability to generate clean energy, with their environmental impacts, including on landscapes, heritage and flora and fauna. This might reduce the potential for renewable energy generating schemes, but this is unlikely to be significant.
- 10.9.13 Considered holistically, the Plan is predicted to have a positive effect with regards to climate change. The amount of growth per annum is lower than the current Adopted Plan, and additional sites are within the urban areas, which should help to minimise increases in carbon from new development. Furthermore, several policies have been strengthened in relation to sustainable use of resources and carbon neutrality. This should ensure that new development performs better than would be the case at the moment and so moderate positive effects are likely.
- 10.9.14 With respect to climate change adaptation, whilst the majority of sites are in areas of low fluvial flood risk (Flood Zone 1), some of the allocated residential sites are in Flood Zone 2 or 3. For the most part, the overlaps are to a minor extent, meaning that design considerations would be expected to mitigate any increased flood risk. That said, ABB-7 is at significant risk of flooding and despite potential mitigation, there are potentially negative effects with respect to climate change adaptation.
- 10.9.15 The removal of two strategic areas of growth (SLO-10 and BUL-7) would reduce the overall area of sites which are identified as at risk of flooding (flood risk identified on site SLO-10), though the nature of these sites means that risk would have been expected to have been mitigated anyway.
- 10.9.16 Several policies will help to further mitigate effects in terms of flooding. For example Policy NE4 (Managing flood risk and water quality) requires site specific flood risk assessments for large developments and the provision of mitigation measures for up to 1% annual flood probability plus an allowance for climate change in flood risk areas. Other measures required are floor levels set no lower than 600 mm above the 1% annual probability plus climate change allowance flood level. The policy also requires the incorporation of sustainable drainage (SuDS) systems to manage surface water run-off.
- 10.9.17 Policy NE1 (Green and Blue Infrastructure) seeks to integrate SuDS within built-up centres. Overall, the negative effects of sites located in flood zones 2 and 3 are partly mitigated through measures introduced in policy NE1 and NW4.

- 10.9.18 Policy NE4 aims for developments to deliver a net increase in infiltration rates, helping to reduce future flood risk and mitigate any adverse effects of development.
- 10.9.19 A range of other Plan policies could also help in respect of climate change resilience, and there have been amendments to several policies to strengthen the focus on climate change.
- 10.9.20 DS3 is beneficial as it requires new development to be resilient to climate change and to provide environmental mitigation and enhancement.
- 10.9.21 Policy SA1 (Development principles on strategic sites) promotes the retention and enhancement of hedgerows, trees and green infrastructure (GI) which is likely to have multiple beneficial effects in terms of resilience, such as reducing heat island effects, providing shading, reducing rainwater flows into sewer systems thus conserving energy (for pumping and water treatment) and replenishing ground water reserves. The policy also seeks the integration of existing rights of way into green/open space networks and provision of new pedestrian and cycle links to the sider area, secure cycle parking which will encourage active travel.
- 10.9.22 Several of the Plan policies promote tree and orchard planting.
- 10.9.23 When considering the proposed strategy (which is broadly positive in terms of minimising carbon emissions) alongside improvements to policies in relation to climate change resilience and mitigation, it is predicted that **potential major positive effects** could arise. An element of uncertainty exists as it is uncertain whether measures in relation to climate change would be firm requirements (especially if scheme viability was affected negatively).
- 10.9.24 In terms of recommendations, the Plan could benefit climate change resilience further by promoting low-traffic neighbourhoods in appropriate circumstances.

### **Appraisal of reasonable alternatives**

#### Urban Dispersal Plus HSG4 / HSG7

- 10.9.25 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals. The inclusion of these sites would lead to greater emissions from construction / resource use and an increase in homes. However, there would also be potential for onsite climate change mitigation measures such as tree planting, renewable energy generation and sustainable transport options, made more likely due to the strategic greenfield nature of the sites.
- 10.9.26 The Woodlands (SLO-10/HSG4) has some areas which are at risk of fluvial flooding, however the large size of the site and its small proportion which is identified as at risk of flooding ought to mean that design considerations should mitigate any elevated flood risk. Whilst these considerations are true, the fact that these sites are existing allocations, mean that, compared to the draft Plan, no further effects are predicted.

- 10.9.27 Overall, this approach is predicted to have potential major positive effects, and performs similarly to the draft Plan.

**Appraisal summary table (Climatic factors)**

Reasonable alternative	Effects summary	Rank
1) Proposed approach (dispersal)	Major +ve ?	-
2) Proposed approach plus strategic sites HSG4 / HSG7	Major +ve ?	-

**10.10 SA Topic 9: Material Assets**

**Appraisal of the Draft Plan**

- 10.10.1 The additional site allocations include a mix of brownfield and greenfield land. In terms of land resources, the focus on urban areas and previously developed land (PDL) is positive as it serves to recycle brownfield / PDL sites. Though there are some greenfield land sites proposed for allocation, the total amount of land involved is not substantial. Furthermore, de-allocating the ‘East of Bulkington’ and ‘The Woodlands’ strategic sites means that these large greenfield sites would no longer be earmarked for development, in favour of the aforementioned greater brownfield focus
- 10.10.2 Several plan policies support the use of brownfield land, such as Policy DS3 (development principles) which prioritises the utilisation of previously developed land and the bringing back into use of underutilised buildings. This serves to recycle land and embedded carbon within existing buildings through re-use/ adaptation. The focus on brownfield land is greater compared to the existing adopted version of Policy DS3.
- 10.10.3 Policy H1 (Range and mix of housing) is also positive as it seeks the provision of homes for older people which allows older residents to downsize to more manageable dwellings freeing up larger homes for families, which helps reduce underoccupancy and improve flexibility/ choice in the market.
- 10.10.4 Policies BE3 (Sustainable design and construction) and BE4 are also likely to have positive effects as they seek to conserve non-renewable resources, requiring development to minimise the use of non-renewable resources, harvest rain water and minimise air, noise, soil and light pollution. BE3 also promotes sustainable construction requiring that development utilise waste as resource to be re-used, recycled or recovered. The focus on climate change mitigation and the sustainable use of resources is also strengthened compared to the existing versions of these policies in the Adopted Local Plan.
- 10.10.5 SA1 has also been amended so that the strategic sites need to consider the sustainable use of materials.
- 10.10.6 Overall, there is a focus on the use of brownfield land and buildings, and several policies are proposed that seek to ensure that natural resources are used efficiently. This gives rise to positive effects with regards to material assets, but these are offset somewhat by the proposed use of some greenfield land. Therefore overall, minor positive effects are predicted.

## Appraisal of reasonable alternatives

### Urban Dispersal Plus HSG4 / HSG7

- 10.10.7 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals. The inclusion of these sites could lead to the loss of some large areas of greenfield land.
- 10.10.8 These are not negative effects, as the sites are already allocated, but in terms of material resources, this approach is ranked less favourable to the draft Plan (despite both being afforded a minor positive effect overall).

### Appraisal summary table (Material assets)

Reasonable alternative	Effects summary	Rank
1) Proposed approach (dispersal)	Minor +ve	1
2) Proposed approach plus strategic sites HSG4 / HSG7	Minor +ve	2

## 10.11 SA Topic 10: Cultural Heritage

### Appraisal of the Draft Plan

- 10.11.1 There are numerous heritage assets in Nuneaton, including listed buildings, registered park and gardens, scheduled monuments and conservation areas. With a few exceptions, the majority of new site allocations are not constrained by historic environment considerations.
- 10.11.2 Sites ABB-6, ABB-7 and ABB-8 all sit adjacent to and partially within the Nuneaton Town Centre Conservation Area. Sites ABB-7 (Mill St. & Bridge St.), ABB-8 (NUN-217 Vicarage St.) overlap the Nuneaton Town Centre Conservation Area (NTCA). ABB-7 is within mainly within Character Area 3 (Riversley Park and Coton Road) of the NTCA, described as an 'irregular linear area of land mostly lying along the west side of the river Anker, bounded to the west by Coton Road, to the east by Sainsbury's Supermarket and King Edward VI playing field, to the south by the railway line, and to the north by Mill Walk'<sup>8</sup>. It comprises Edwardian parkland and adjacent post-war gardens along the river Anker and includes housing development facing the park along the west side of Coton Road. This part of the NTCA is described as having several negative features such as some of the buildings on Coton Rd, Reversely House and the car dominated environment along the Ring Road /Coton Road and car parking areas. Therefore, new development on the site has the potential to enhance the character of the conservation area as the proposed site is on PDL and currently comprises several car parking areas, and the Nuneaton Job Centre building on Mill Walk.

<sup>8</sup> [Nuneaton Town Centre Conservation Area Appraisal and Management Proposals \(2009\)](#)

- 10.11.3 Redeveloping this site as part of a regeneration scheme could potentially have positive effects on enhancing this part of the NTCA but could also lead to adverse effects if inappropriate design or materials are used in the scheme.
- 10.11.4 The southernmost portion of Site ABB-8 overlaps character Area 2 (the Civic and Administrative Area) of the NTCA. This PDL site includes Nuneaton Library and car parking areas.
- 10.11.5 The NTCA Appraisal and Management Proposals<sup>9</sup> describes the townscape character as comprising a loose aggregation of large discreet, mostly public buildings from the mid-late 20th century in a mixed setting of landscaped open space, car parks, streets, rear servicing areas to shops fronting the Market Place and riverside. The townscape east of this area (where the southern part of site ABB-8 is located) which includes the library is described as being in transition and lacking coherent identity. Here again, redevelopment has the potential to enhance the character of this part of the NTCA. However, given the presence of St Nicolas Parish Church (Grade I listed) adjacent to this area (along with several other Grade 2 listed buildings), it will be important that development is of an appropriate scale, height, massing and design. The indicative capacity proposed suggests that development would need to be relatively dense, so there is potential for negative effects if this is overbearing. However, the poor condition of this part of the town should mean that positive effects are more likely than negative ones.
- 10.11.6 Site ABB-4 abuts the Abbey Conservation Area (which includes the wider residential area around Manor Court Road, including Earls Road and Manor Park Road which constitute Nuneaton's first middle-class suburb of the late 19th and early 20th centuries<sup>10</sup>).
- 10.11.7 Development has the potential to affect the significance of the conservation areas (including their setting) as well as the constituent listed buildings. That said, sensitive design in accordance with local and national policy ought to mitigate more significant effects from arising. There are some locations in the Conservation Area with poor character, and development could potentially help to enhance these areas, helping to reduce negative effects and promote positive relationships between new development and the historic environment.
- 10.11.8 Sites ABB-4, ABB-5 and ABB-6 are all within relatively close proximity to a Scheduled Monument; the Benedictine priory and precinct of St Mary and the Grade II listed St. Mary's Church (mainly Victorian parish church built on the grounds of the original ruins of the medieval priory). Historic England's listing states that 'little remains of the original 12th Century church except for massive piers which supported the central tower. These are incorporated within the mainly Victorian parish church now standing on the site'<sup>11</sup>.

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<sup>9</sup> Ibid. page 30

<sup>10</sup> Source: [Abbey Conservation Area Appraisal and Management Proposals \(2008\)](#)

<sup>11</sup> Source: [Historic England](#)

- 10.11.9 The proposed site is well enclosed and separated from the Scheduled monument by existing residential development and mature tree cover, which helps to reduce potential effects on the scheduled Monument.
- 10.11.10 The proposed strategy proposes the de-allocation of the existing strategic sites at 'The Woodlands' and 'East of Bulkington'. These sites not known to be sensitive from a cultural heritage perspective, and so neutral effects are predicted (i.e. removing them will not result in any significant effects on the historic environment).
- 10.11.11 Several existing plan policies ought to help mitigate potential effects of new development locations. For example, Policy BE4 (Valuing and conserving our historic environment) is highly relevant as it seeks to sustain and enhance the borough's heritage assets such as listed buildings and conservation areas and settings of townscapes. Development affecting designated and non-designated heritage assets will be 'expected to make a positive contribution to its character, appearance and significance'.
- 10.11.12 Under this policy, applications affecting the significance of heritage assets will required to include an assessment of the likely impacts on the heritage assets, their importance and settings, to a level of detail commensurate with the importance of the asset(s). These are to be informed by existing reports/assessments including Conservation Area Character Appraisal and Management Plans.
- 10.11.13 Policies DS1 (Presumption in favour of sustainable development), DS3 (Development principles) require all new development to sustain and enhance the historic environment. New development will be prioritised on previously developed land (PDL). Policy DS5 (residential allocations) recognises that some of the non-strategic housing sites have heritage constraints stating that 'the opportunity should be taken to use, enhance and sustain these assets, or in exceptional circumstances, compensating, as part of any development proposal.'
- 10.11.14 Policy BE2 (Renewable and Low Carbon Energy) balances the need for wind turbines and their ability to generate clean energy, with their environmental impacts, including on the historic environment. This might reduce the potential for renewable energy generating schemes to cause significant harm to the Borough's cultural heritage assets.
- 10.11.15 Policy BE3 (Sustainable design and construction) requires all development to contribute to local distinctiveness and character by reflecting the positive attributes of the neighbouring area, respecting sensitivity to change of character including street layout, residential amenity and built form. It further emphasises the holistic benefits which arise from the efforts to preserve and enhance historic assets. Overall, the policies above are likely to have positive effects on the historic environment as they seek to protect and enhance designated and designated assets.



- 10.11.16 Policy NE1 (Green and Blue Infrastructure) acknowledges the interdependency between the historic and natural environments across the Borough, this emphasis ought to help to preserve cultural heritage, especially the natural setting of historic assets. Policy NE4 (Managing Flood Risk and Water Quality) seeks to ensure that archaeology across the Borough is protected from detrimental impacts of drainage and waterlogging.
- 10.11.17 Collectively, the Plan Policies discussed should help to mitigate some of the negative effects on cultural heritage that may arise as a result of new development locations (both allocated and windfall development).
- 10.11.18 However, there are no substantial benefits likely to arise beyond the baseline position as there have been no major amendments to any of the policies in relation to heritage (compared to the Adopted Plan).
- 10.11.19 Overall, mixed effects are predicted (i.e. both positive and negative) whilst site ABB-4 could adversely impact the character of the Abbey Conservation Area, the policies discussed above will serve to reduce potential adverse effects, leaving residual minor negative effects. The potential for negative effects is also identified associated with site ABB8, which is adjacent to a Grade 1 listed Church. Conversely sites ABB-7 and ABB-8 and the above discussed policies have the potential to enhance the Nuneaton Town Centre conservation Area through regeneration, which is likely to remove some of the negative elements currently impacting the character of the NTCA generating long term minor positive effects on the historic environment.
- 10.11.20 It is recommended that development proposals with potential impacts on conservation areas should provide a detailed heritage impact assessment and include appropriate mitigation measures to minimise adverse impacts. It would also be beneficial to identify locally important heritage assets and incorporate features into new development. Development at ABB8 needs to ensure that it is of an appropriate height and does not dominate the townscape.

### **Appraisal of reasonable alternatives**

#### Urban Dispersal Plus HSG4 / HSG7

- 10.11.21 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals. Their relatively unconstrained nature mean that inclusion within the strategy would not lead to any additional significant effects. Furthermore, the sites are existing allocations, meaning that rolling these sites forward into the strategy would lead to no effects beyond those outlined under the Plan appraisal.

### **Appraisal summary table (Cultural heritage)**

<b>Reasonable alternative</b>	<b>Effects summary</b>		<b>Rank</b>
1) Proposed approach (dispersal)	Min +ve	Min -ve	-
2) Proposed approach plus strategic sites HSG4 / HSG7	Min +ve	Min -ve	-

## 10.12 SA Topic 11: Landscape

### Appraisal of the Draft Plan

- 10.12.1 The majority of additional allocated sites are not heavily constrained with regards to landscape character as they are generally within existing built-up areas and /or in close proximity to larger scale growth that would be expected to come forward through the adopted local plan.
- 10.12.2 Site, EMP2, a large 18 ha site located allocated mainly for employment with some residential use is at the urban fringe of the settlement comprising open fields intercepted by the M6 and A444 and large warehouse developments visible to the south west of site. Whilst development here would alter the semi-rural/ open character of the site the landscape is rendered somewhat less sensitive due to the major highway infrastructure and the adjacent warehouse development. The landscape has been assessed as having few higher value features/ views and as having moderate-high capacity to accommodate employment and residential use<sup>12</sup>. This site is already allocated in the adopted Plan for employment. Allowing some release for residential development is likely to have a less negative effect upon landscape character given that it would be less intrusive in terms of traffic and scale of buildings.
- 10.12.3 GAL 7 is somewhat sensitive to change, and therefore development could have some minor negative effects with regards to development.
- 10.12.4 Conversely, redeveloping sites such as ABB4,5,6,7 and 8 could potentially improve the urban landscape/ townscape as these locations includes some negative features such as buildings and land in poor states of repair and a car dominated environment.
- 10.12.5 Policy SEA6 requires development on the Bowling Green Lane site to protect and enhance the network of hedgerows and trees on the site as well as retaining views towards Bedworth Water Tower, promoting positive outcomes for both the preservation of important views and the screening of development to mitigate landscape impacts.
- 10.12.6 The de-allocation of strategic sites 'East of Bulkington' and the 'Woodlands' is also positive with regards to landscape as development here could lead to negative effects on the character of the urban fringes. Both sites fall within character areas which have moderate strength of character and moderate/moderate-weak land condition. As such, both land condition would be likely to be maintained and the moderate strength of character preserved, with the potential for future enhancement.
- 10.12.7 A range of existing plan policies that will be rolled forward from the adopted local plan will continue to have benefits with regards to landscape. This includes, NE1 and NE5 in particular.

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<sup>12</sup> Ibid: 5592.002

- 10.12.8 Further benefits are anticipated through amendments to policies such as SA1 (Development principles on strategic sites) which calls for development to incorporate landscape features into scheme design and retain/ enhance existing features such hedgerows, trees and ridge and furrow sites. This policy also requires the provision of appropriate trees and orchards, which is an addition to the adopted plan policies.
- 10.12.9 The strategic site policies are also now explicit in the need to retain and enhance features such as hedgerows, which is likely to have benefits with regards to landscape character.
- 10.12.10 Policy BE2 (Renewable and Low Carbon Energy) balances the need for wind turbines and their ability to generate clean energy, with their environmental impacts, including on the local landscape. This might reduce the potential for renewable energy generating schemes to cause significant harm to the Borough's land and townscapes. Policy BE3 (Sustainable design and construction) calls for development to contribute to local distinctiveness and character reflecting the positive attributes of surrounding areas and respecting sensitivity to change within urban character areas.
- 10.12.11 Overall, the effects on landscape are predicted to be positive. There would be lesser development on large scale strategic greenfield sites, and the new sites proposed are mostly of a low sensitivity to change. A focus on brownfield regeneration should also help to improve townscape character in Nuneaton. Though some site allocations in semi-rural locations would result in changes to the character of the landscape, these sites have been assessed as having moderate-high capacity to accommodate development (NBLCS). Furthermore, the regeneration of sites such as ABB6,7,8 is likely to create more attractive areas with enhanced landscape / townscape. Therefore, overall, minor positive effects on landscape are predicted.

### **Appraisal of reasonable alternatives**

#### Urban Dispersal Plus HSG4 / HSG7

- 10.12.12 These sites have been considered in the SA process so far under the references SLO-10 (HSG4) and BUL-7 (HSG7) within the site appraisals. The inclusion of these sites would not lead to any additional effects, considering the fact that they are existing allocations. Effects are expected to be largely aligned with those of the proposed Plan strategy, though without the additional positives associated with the deallocation of two large greenfield sites. Neutral effects are predicted overall.

### **Appraisal summary table (Landscape)**

<b>Reasonable alternative</b>	<b>Effects summary</b>	<b>Rank</b>
1) Proposed approach (dispersal)	Minor +ve	1
2) Proposed approach plus strategic sites HSG4 / HSG7	Neutral	2

## 10.13 Summary of Plan effects

- 10.13.1 The Plan is predicted to have mostly positive effects across the SA Framework. The most prominent positive effects relate to climatic factors, as there have been several changes to Plan policies that ought to reduce carbon emissions as well as improving resilience to climate change. The focus of additional sites in areas that could benefit deprived communities is also predicted to have positive effects of moderate significance through the delivery of infrastructure, affordable housing and public realm improvements.
- 10.13.2 Minor positive effects are also predicted in relation to economic factors, biodiversity, water, material assets, landscape and cultural heritage.
- 10.13.3 The main negative effects relate to the de-allocation of two strategic sites, which could prevent positive social effects from arising in these locations. There is also potential for new site allocations to negatively affect the historic environment, but the magnitude of effects would be small. Conversely, by de-allocating these sites, there would be a greater positive effect on soil. Though the significance of effects overall is unlikely to change, the de-allocation of these sites also has positive implications in relation to other SA factors such as Landscape, air quality and material assets.
- 10.13.4 Option 2 performs very similarly to the draft Plan, which is to be expected given that all is the same with the exception of two existing strategic allocations being included. For the most part, the effects are not significantly different from the draft Plan (Option 1), with the effects being recorded as the same for 7 out of the 11 SA Topics. The key differences are for soil and Landscape – with Option 2 performing less well given that it involves additional release of greenfield land compared to Option 1. Conversely, Option 2 avoids the negative effects on social factors, population and health that could arise as a result of de-allocating two strategic sites.

**Table 10.1:** Summary of appraisal findings

SA Topic	1. The draft Plan		2. Urban dispersal plus HSG4 and HSG7	
1. Economic factors	Minor +ve		Minor +ve	
2. Social factors	Moderate +ve	Minor +ve	Moderate +ve	
3. Biodiversity	Minor +ve		Minor +ve	
4. Population and health	Moderate +ve	Minor +ve	Moderate +ve	
5. Soil	Moderate +ve		Minor +ve	
6. Water	Minor +ve		Minor +ve	
7. Air quality	Neutral		Neutral	
8. Climatic factors	Major positive ?		Major positive ?	
9. Material assets	Minor +ve		Minor +ve	
10. Cultural Heritage	Minor +ve	Minor -ve	Minor +ve	Minor -ve
11. Landscape	Minor +ve		Neutral	

**Table 10.2:** Rank of performance

SA Topic	1. The draft Plan	2. Urban dispersal plus HSG4 and HSG7
1. Economic factors	2	1
2. Social factors	2	1
3. Biodiversity	-	-
4. Population and health	2	1
5. Soil	1	2
6. Water	1	2
7. Air quality	1	2
8. Climatic factors	-	-
9. Material assets	-	-
10. Cultural Heritage	-	-
11. Landscape	1	2

10.13.5 Though the two options at this stage are predicted to have effects of the same significance for a range of SA topics, it is possible to differentiate which is the most preferable in relative terms.

10.13.6 The draft Plan is considered to perform most preferably with regards to 4 of the 11 SA topics, whilst Option 2 is considered to perform most preferable with regards to 3 of the SA topics. For the remaining 4 topics, the options are considered to perform on par.

## **10.14 Outline reasons for pursuing the Draft Plan approach**

10.14.1 As set out above, the approach taken within the Draft Plan is predicted to have primarily positive effects across the SA Framework and performs preferably when compared with the alternative approach. The strategy seeks deliver the housing and employment provision required to meet the Borough's needs and ensure the Borough can grow in a sustainable manner, prioritising brownfield land available within the Borough. The alternative approach which looks at the urban dispersal as well as strategic sites HSG4 and HSG7 which are proposed to be 'deallocated' in the Draft Plan, has been rejected as following the adoption of the Borough Plan in 2019 an assessment of all the strategic sites were undertaken to ensure that any sites rolled forward into the Borough Plan Review would be deliverable and viable. Following this assessment, the approach towards urban dispersal was pursued as this seeks to allocate a range of sites which are deliverable within the plan period. It is however noted that planning applications / developer interest has been progressed on these sites. Site HSG7 benefits from a resolution to grant outline permission subject to the signing of s106 and therefore will form part of the committed supply within in the Plan.

# 11. Recommendations

11.1.1 The sustainability appraisal (SA) of the Nuneaton Local Plan review has been an iterative process, in which proposals for mitigation and enhancement have been considered.

## 11.2 Issues and Options Stage

11.2.1 A range of suggestions were made in the issues and options Interim SA Report which have not been repeated here as they related to high level issue that have been addressed as the Plan has progressed.

## 11.3 Preferred Options Stage

11.3.1 The following recommendations were made in the context of the preferred options version of the Plan. These sought to address the minor negative effects identified, as well as enhancing the positives. The Council's response to each recommendation is provided.

**Table 11.1** Recommendations at preferred options stage

Recommendations	Council response
<p>Allocated sites that contain agricultural land ought to be surveyed prior to development to confirm which contain best and most versatile land (if any). Where resources are identified, they should be avoided and preserved as much as possible (presuming there are parts of the sites that are of a lower quality). It is acknowledged this may be difficult given the small scale of the sites involved, but perhaps community allotments or gardens could be introduced.</p>	<p>The development sites are relatively small scale, however all major applications are required to either provide onsite (depending upon size and existing provision) or make a contribution towards community allotments. In addition, the Council is currently looking at providing a validation list and this could be included within this. Notwithstanding this, Natural England are the statutory consultees on agricultural land value and have not made any objections to the chosen sites.</p>
<p>Promote low emission zones in areas of poor air quality (AQMA's).</p>	<p>Where Low Emission Zones or Clean Air Zones are in place, they have largely been mandated by Central Government due to the extent of the areas air quality problems.</p> <p>Although NBBC have 2 Air Quality Management Areas (AQMA's), it should be noted that AQMA 1 – Leicester Road gyratory has been compliant, and significantly so, with the national air quality objectives for a number of years.</p>

## Recommendations

## Council response

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	<p>Defra have previously recommended revoking this, but a political decision was taken to retain it due to the extensive house building to the north of Nuneaton. AQMA 2, Midland Road/ Corporation Street, has been compliant in 2020, 21 and 22. This compliance will now be monitored to ensure the trend continues but in addition there is also transport infrastructure work due to take place here that will reduce the issue in the area further.</p> <p>Air Quality Technical Guidance 22 (TG22) cites the extensive resource required for LEZ/CAZ implementation. Currently this resource would be disproportionate to the level of air quality impact at NBBC.</p>
<p>The Plan could benefit climate change further by promoting car-free neighbourhoods in appropriate circumstances.</p>	<p>Will be added to Policy DS1.</p>
<p>It is recommended that development proposals with potential impacts on conservation areas should provide a detailed heritage impact assessment and include appropriate mitigation measures to minimise adverse impacts. Development at ABB8 needs to ensure that it is of an appropriate height and does not dominate the townscape; a site specific policy would be useful in this respect.</p>	<p>Policy BE4 already covers Conservation Areas and that an impact assessment should be provided where it impacts on heritage assets or their surroundings and must be proportionate to the importance of the asset.</p> <p>In terms of ABB8 (the Vicarage Street development), this site would need to be considered under Policy BE4 as it is partly within a Conservation Area. In addition, Policy TC1 states that there is an intention to provide SPD's for the Town Centres so design will be included within those.</p>
<p>Identify and allocate / safeguard opportunity areas for nature recovery (in conjunction with nature recovery strategies).</p>	<p>NBBC along with other neighbouring Local Authorities are committed to continue working with the WCC Ecology, Historic Environment and Landscape Team to provide a County wide Recovery Strategy. The requirement for Recovery Strategies for sites is also included in Policy SA1.</p>

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## Recommendations

## Council response

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Consider introducing a policy clause that allows carbon offsetting where it is not possible to achieve the required carbon reductions on development sites directly.

We are awaiting the Planning Inspectors final report on Warwick District Council's Net Zero Carbon DPD and specifically the monitoring mechanisms. This is so NBBC can then investigate how carbon offsetting can be implemented. NBBC are also looking at options for carbon offsetting contributions through wider County work.

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Require developments to demonstrate how the embodied carbon and resource use of materials and construction has been minimised.

As above. Also, Policy BE3 refers to the use of resources and the associated Sustainable Design and Construction Document 2020 requires that a checklist is completed for major development to ensure the provision of Site Waste, Demolition and Construction Management Plans and references to Waste and Resources Action Programme.

## 11.4 Pre-Submission Plan

11.4.1 The recommendations identified at pre-submission stage are re-iterated, though it is noted that the Council considers that these issues are dealt in the Plan already or can be dealt with through other mechanisms.

11.4.2 One additional recommendation has been made at this stage.

- Site ABB-4 is entirely overlapping with an area of Tree Preservation Areas. Though the site has resolution to grant planning permission, and is previously developed land. it would be helpful to specify within a site specific clause that development should seek to avoid any loss of TPOs. This could help to guide layout and design and provide a stronger indication that tree protection is crucial on this site.



# 12. Monitoring

- 12.1.1 There is a requirement to outline the measures envisaged to monitor the predicted effects of the Plan. In particular, there is a need to focus on the significant effects that are identified.
- 12.1.2 It is important to track predicted effects to ensure that positive effects are actually realised and to identify any unforeseen negative effects that may occur.
- 12.1.3 Table 12.1 below sets out monitoring measures under each SA Topic which are intended to be used to monitor any significant effects and to track the baseline position more generally.
- 12.1.4 At this stage the monitoring measures have not been finalised, as there is a need to confirm the feasibility of collecting information for the proposed measures. Wherever possible, measures have been drawn from the Local Plan monitoring framework to reduce duplication.
- 12.1.5 The monitoring measures will be finalised once the Plan is adopted, and will be set out in an SA Statement in accordance with the SEA Regulations.

**Table 12.1** - Monitoring the effects of the Plan

SA Topic	Proposed Monitoring Measures
<b>Economic Factors</b>	
<p>Overall, the approach to employment is likely to have <b>minor positive effects</b> on economic factors. Whilst sufficient employment land is identified to meet needs, much of this is already allocated in the Adopted plan, so the effects are unlikely to be significant. That said, where additional / new mixed use and employment sites are identified in the urban areas, this should help to increase their attractiveness, increasing land values and helping to attract investment which will facilitate economic growth. There are also several policy improvements relating to climate change, training and overnight lorry parking that will have benefits for business activity.</p>	<p>Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report</p> <p>Number of employee jobs by industry</p> <p>Ratio of workplace based employment to residence-based employment</p>
<b>Social Factors</b>	
<p>Overall, mixed effects are predicted. The new allocations and policies seeking accessible affordable housing and integrated sustainable transport infrastructure are anticipated to have positive effects. The focus of development in deprived areas is also likely to create positive</p>	<p>Developments of 11 to 14 dwellings and 15+ dwellings, where 2 units and 25% respectively, of affordable housing is negotiated.</p>

SA Topic	Proposed Monitoring Measures
<p>effects through provision of more housing choices, new infrastructure, attractive public realm, services and employment opportunities. Whilst some of the sites are currently in areas with limited accessibility, when these are considered along with existing plan allocations, the proposed overall growth is likely to facilitate improved infrastructure and services which would improve accessibility and connectivity. Together, these constitute <b>moderate positive effects</b>.</p> <p>Where strategic sites have been removed from the adopted Plan, the social benefits that would have arisen in these locations will no longer arise. In this respect, <b>minor negative effects</b> are predicted.</p>	<p>Delivery of infrastructure set out within the Infrastructure Delivery Plan.</p> <p>% Of new major residential dwellings for M4(2) and 5% for M4(3).</p> <p>Health of district and local centres.</p> <p>Housing delivery rate</p> <p>Number of applications granted which are not mitigated against, following objection on transport grounds</p>
<hr/> <h3 data-bbox="248 903 435 945">Biodiversity</h3> <hr/>	
<p>Given the cumulative growth proposed negative effects are possible in terms of disturbance to local wildlife. The effects will likely be moderated by Plan policies seeking to conserve and enhance biodiversity, and are also offset to an extent by the de-allocation of two strategic sites. Therefore, residual effects would likely be neutral.</p> <p>Where biodiversity net gains are achieved, longer term effects would be positive. It is unclear the extent to which this would be beyond a minimum of 10% net gain. However, there are some additional policy measures introduced through the Plan review that seek to ensure that biodiversity is enhanced and that local features such as trees, hedgerows and ponds are incorporated into new development (both on the strategic sites and for windfall / general development). This contributes to overall <b>minor positive effects</b>.</p>	<p>Trends in the condition of SSSI, Special Area of Conservation and local wildlife sites.</p> <p>% Net gain in biodiversity value achieved for all developments.</p> <p>Number and percentage of developments surpassing minimum 10% net gain requirements.</p> <p>Number of new trees and orchards planted as a result of new development.</p>
<hr/> <h3 data-bbox="248 1669 581 1732">Population and Health</h3> <hr/>	
<p>Mixed effects are anticipated overall. The regeneration of deprived areas and policies seeking well designed, accessible homes of varied types and tenures (including affordable homes) along with policies seeking provision of green /</p>	<p>Delivery of infrastructure set out within the Infrastructure Delivery Plan.</p> <p>Mortality rates.</p>

SA Topic	Proposed Monitoring Measures
<p>blue infrastructure and sustainable transport, are likely to produce positive effects on population and human health. The additional sites proposed for allocation are generally well located and should have good access to health facilities and other services (by active modes of travel). In combination, <b>moderate positive effects</b> are predicted.</p> <p>On the other hand, the de-allocation of two strategic sites is expected to result these locations not benefiting from a range of services and infrastructures which could have served to improve physical and mental health outcomes. As such, <b>minor negative effects</b> are also predicted.</p>	<p>Loss or gain of community facilities.</p>
<hr/> <p><b>Soil</b></p> <hr/>	
<p>In conclusion, the de-allocation of strategic sites which contain agricultural land and would mean that the residual position is one of less soil resources being affected. The promotion of growth on sites which are less appropriate for agricultural development, do not contain soil resources and could help to remediate contamination ought to lead to positive effects. Furthermore, there are several plan policies that prioritise previously developed land, including the remediation of potentially contaminated sites. Consequently, <b>moderate positive effects</b> are predicted overall.</p>	<p>Loss of best and most versatile agricultural land (Hectares).</p> <p>Development of a potentially contaminated or unstable site.</p>
<hr/> <p><b>Water</b></p> <hr/>	
<p>Overall, the publication Plan is predicted to have mostly neutral effects with regards to water quality, but some improvements in policy requirements relating to water efficiency mean that <b>minor positive effects</b> could arise in the longer term. The de-allocation of two large sites is also likely to reduce pressure on waste water networks, which could be an improvement upon the existing situation.</p>	<p>The number of planning permissions granted contrary to the advice of the Environment Agency on grounds of risk to water quality.</p> <p>Change in the chemical and biological classification of watercourses.</p> <p>New homes installing rainwater harvesting systems.</p>
<hr/> <p><b>Air Quality</b></p> <hr/>	

SA Topic	Proposed Monitoring Measures
<p>Together, the Plan policies are likely to have a positive effect on air quality, and there is a greater emphasis on carbon neutrality in the publication version (compared to the existing Adopted Plan). Offsetting these benefits is the fact that additional development is proposed in the urban areas, close to air quality management areas. This could bring about some minor negative effects. Overall, a residual <b>neutral effect</b> is predicted in terms of air quality.</p>	<p>Pollutant levels.</p> <p>Modes of travel to work.</p>
<hr/> <p><b>Climatic Factors</b></p> <hr/>	
<p>The proposed strategy is broadly positive in terms of minimising carbon emissions, and there have also been improvements to policies in relation to climate change resilience and mitigation. Therefore, <u>potential</u> <b>major positive effects</b> could arise. An element of uncertainty exists as it is uncertain whether measures in relation to climate change would be firm requirements (especially if scheme viability was affected negatively).</p>	<p>Emissions per capita by sector</p> <p>Installed capacity of renewable energy generation schemes.</p> <p>Commercial applications achieving BREEAM very good standard.</p> <p>The number of planning permissions granted contrary to advice on grounds of flood risk.</p>
<hr/> <p><b>Material Assets</b></p> <hr/>	
<p>Overall, there is a focus on the use of brownfield land and buildings, and several policies are proposed that seek to ensure that natural resources are used efficiently. This gives rise to positive effects with regards to material assets, but these are offset somewhat by the proposed use of some greenfield land. Therefore overall, <b>minor positive effects</b> are predicted.</p>	<p>Ha of brownfield land developed.</p> <p>% Of household waste sent for recycling, composting or reuse.</p> <p>Waste generation per capita.</p>
<hr/> <p><b>Cultural Heritage</b></p> <hr/>	
<p>Overall, mixed effects are predicted (i.e. both positive and negative). Of the new allocations, there could be some adverse effects on the character of Conservation Areas, and listed buildings. However, there is also potential for development on allocated sites to enhance the Nuneaton Town Centre conservation Area through regeneration. The Plan policies are also</p>	<p>Heritage assets ‘at risk.’</p> <p>Conservation Areas with an up to date assessment and management plan.</p> <p>Planning applications granted contrary to advice on heritage grounds.</p>

SA Topic	Proposed Monitoring Measures
<p>supportive of the protection and enhancement of the historic environment. <b>Minor positive effects</b> and <b>minor negative effects</b> are predicted.</p>	
<p><b>Landscape</b></p>	
<p>New sites proposed are mostly of a low sensitivity to change. A focus on brownfield regeneration should also help to improve townscape character in Nuneaton. Though some site allocations in semi-rural locations would result in changes to the character of the landscape, these sites have been assessed as having moderate-high capacity to accommodate development. Therefore, overall, <b>minor positive effects</b> on landscape are predicted.</p>	<p>Development given planning permission in highly valued landscape areas.</p>

## 13. Next steps

- 13.1.1 This SA Report has been prepared to accompany the Pre-Submission version of the Local Plan. The report draws together all the SA outputs that have been prepared to date as well as discussing additional appraisal work that may need to be undertaken at future stages.
- 13.1.2 The final Plan will be 'Submitted' for Examination in Public (EiP). The Council will also submit a summary of issues raised (if any) through representations at the Publication stage so that these can be considered by the Government appointed Planning Inspector who will oversee the EiP. At the end of the EiP, the Inspector will judge whether or not the Plan is 'sound'.
- 13.1.3 Further SA work may be required to support the Plan-making process as it moves through Examination (for example the preparation of SA Addendums to deal with changes / modifications).

# Appendix A: Appraisal of alternatives (Preferred Options Stage)

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SA Topic 1	Economic Factors
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## Option 1: Urban dispersal

The proposed approach focuses additional residential development in existing, well connected, urban areas close to employment opportunities and services, and is therefore likely to attract business investment and workforce to the area producing favourable effects on economic growth within the Borough. Some of the additional residential sites, such as EXH1 are in very close proximity to employment sites (EMP3) which is likely to make these locations attractive to both employers and workforce reducing the need to travel further afield to access employment opportunities.

In terms of residential and employment growth, the picture is similar to the adopted Plan. Several sites in the adopted plan have been 'de-allocated', which could mean that benefits in these locations for economic factors are no longer realised to the same extent. However, the additional sites identified for development in the Plan shift the emphasis to the inner urban areas, so benefits here (in areas in need of regeneration) would likely be greater.

The strategic employment allocations in the adopted Plan total 86.3 ha, none of which have been developed. Of these original allocations one site, EMP7, may now only deliver 5.3ha (of the original 26 ha planned) which leaves a total of 65.6 of the original site allocations still available for employment development. The evidence base produced for the Borough Plan Review indicates there is a need for an additional 65.6 ha of employment land up to 2041<sup>13</sup>. Therefore, the strategic allocations in the adopted plan and are sufficient to deliver the recently assessed employment land need.

The additional employment site allocation at site ABB12 would contribute an additional 0.5 ha and sites ABB6, ABB7 and BAR1 would provide further mixed use (employment/ residential) land of just under 5.5 ha. These are centrally located with respect to employment opportunities and services. Furthermore, the mixed-use sites are likely to create housing and employment opportunities due to increased footfall and benefits provided by existing infrastructure and amenities. A portion of an existing employment allocation has been earmarked for housing, which means the amount of employment land is reduced in this location. However, overall, the Plan still identifies sufficient land to meet employment needs.

Policy BE3 (Sustainable design and construction) promotes placemaking and requires proposals to contribute to local distinctiveness and character of surrounding neighbourhoods. The policy seeks sustainable new commercial development requiring these to meet BREEAM 'very good standard' where feasible. This is likely to give businesses/ investors additional environmental credentials helping promote their image which is likely to attract investment into the area.

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<sup>13</sup> Icenl, the 'Coventry and Warwickshire Housing and Economic Needs Assessment Employment Needs Paper' (January 2022)

Several other plan policies will continue to contribute positive effects to economic factors such as those that promote accessibility, high quality environments and infrastructure provision. Amendments to the Adopted Plan that are likely to bring about additional benefits relate to an increased focus on climate change resilience (which is positive for economic activity in the longer term) and specific mention of the need to support overnight lorry parking (beneficial for distribution activities).

Overall, the approach to employment is likely to have **minor positive effects** on economic factors. Whilst sufficient employment land is identified to meet needs, much of this is already allocated in the Adopted plan, so the effects are unlikely to be significant. That said, where additional / new mixed use and employment sites are identified in the urban areas, this should help to increase their attractiveness, increasing land values and helping to attract investment which will facilitate economic growth. There are also several policy improvements relating to climate change and overnight lorry parking that will have benefits for business activity.

### **Appraisal of reasonable alternatives**

#### Option 2: Continuation of existing strategy

This approach would include the allocation of a large site for residential development at Bedworth Woodlands which is relatively close to the strategic employment sites south west of Bedworth with good access to the motorway network via the nearby A444. Therefore, this may help address some of accessibility (to employment sites) issues currently experienced in the Borough producing minor positive effects on employment. However, this approach would not produce the additional positive synergies created through the regeneration schemes and the mixed use developments within Nuneaton's town centre described above. The effects of development associated with strategic growth at the Woodlands and Bulkington East may also not arise in a timely manner if no schemes come forward in these locations despite being allocated in the Adopted Plan (as is currently the case). This could have negative connotations for economic factors by holding back housing growth. On balance, neutral effects are predicted.

#### Option 3: Strategic location focus

This option would include a large strategic residential development site at Galley Common to the north western boundary of the Borough on the border with North Warwickshire. This relatively distant from existing employment centres within the plan area and does not benefit from the same level of access to the motorway network as the rest of the Borough. Consequently, this site may potentially exacerbate the current poor accessibility issues associated with employment sites. However, it would offer employment opportunities in terms of construction and also through the creation of new services and local retail to serve new and existing communities. There would also be increased footfall in Galley Common, potentially boosting economic factors. This approach would not involve urban dispersal to the same extent as option 1 and thus lacks the positive effects associated with such allocations. On balance, a mix of **minor positive** and **minor negative effects** are likely with regards to economic factors.

Whilst the large scale growth proposed north of Nuneaton is relatively close to main centre within Nuneaton and enjoys relatively good access via the A5 and A444 to the rest of the Borough, it is fairly distant from the main strategic employment locations and therefore not optimal in terms of addressing some of the accessibility issues currently experienced with respect to employment sites. This approach would not involve urban dispersal to the same extent as option 1 and thus lacks the



positive effects associated with such allocations. However, it will bring further growth into Nuneaton supporting further employment and investment in this area. These are minor positive effects. On balance, a mix of **minor positive** and **minor negative effects** are likely with regards to economic factors.

Option 4: Increased dispersal in the urban areas

The greater scale of growth proposed under this option would require the allocation of additional sites within the existing urban areas including at locations close to strategic employment sites (e.g. around the M6 to the South and at near Bermuda Park) and main (and local) centres within the Borough. Although this option could involve small sites (e.g. north west of the Borough) that are relatively remote from existing employment sites and the highway network, in the main the site options are well connected to the rest of the Borough and in close proximity to main centres of employment and services. The additional housing provision under this option is likely to create more housing options in the market including the provision of more affordable housing. This is likely to have positive effects on employment as it will help attract particularly younger workforce who may not otherwise be able to access housing. Additionally, this option also benefits from the central Nuneaton regeneration mixed use sites. Therefore, this option is likely to produce **moderately positive effects** overall.

Option 5: Dispersal plus strategic focus

This option (5a) includes the above discussed allocations for Option 1 plus a large strategic site at Galley Common. The latter is relatively remote from main centres of employment and services. That said, the additional growth and larger strategic site are likely to generate more housing options in the market including more affordable housing which will help attract workforce to the area. On balance this option is anticipated to engender mixed effects, **moderately positive** ones associated with the increased housing choice and all the benefits associated with the previous option, on the one hand, and **minor negative effects** due to the relative remoteness of the Galley Common site from existing employment and services, on the other.

Option 5b is likely to have similar effects to Option 3a, with the strategic growth and its associated effects centred on north Nuneaton. It would therefore be likely to result in **moderately positive** effects due increased housing choice and AH provision and **minor negative effects** due to the relative remoteness of the northern strategic sites from the main employment areas in the Borough.

**Appraisal summary table (Economic Factors)**

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Minor +ve	
2) Existing strategy rolled forward	660 dpa	Neutral	
3a) Strategic focus (Galley Common)	680 dpa	Minor +ve	Minor -ve
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor +ve	Minor -ve
4) Increased dispersal in the urban areas	710 dpa	Moderate +ve	
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Moderate +ve	Minor -ve
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Moderate +ve	Minor -ve

**Option 1: Urban dispersal**

The adopted Nuneaton and Bedworth Borough Plan (NBBP) provides over 14,000 new dwellings or 703 dpa over the adopted Plan period (2011-2031). The Council’s Borough Plan monitoring report (2020/2021)<sup>14</sup> shows that 4,243 net dwellings have been completed since start of the adopted Plan period (2011) which leaves a further 9,917 dwellings to be completed over the 10 years to 2031 which is around 992 dpa. The report states that there have been 601 completions during 2022/21 which indicates under delivery, though this may be partly attributable to the Covid-19 pandemic. In terms of affordable housing (AH) the report shows 20.6% of housing delivered in 2020/21 was AH (rented and ownership tenures) which 24% lower than the AH delivered in the previous year but when provision is considered over the past 5 year period, AH delivery is on an upward trend.

The additional sites proposed for allocation have relatively good access to local facilities, but a mixed performance in relation to public transport (Table 1). However, the majority of the sites are adjacent, or in close proximity to, larger site allocations (strategic and non-strategic sites in the adopted Plan) where economies of scale may facilitate improved local facilities and enhance public transport. For example, EMP2 is surrounded by large employment and residential allocations (POP3) which are allocated in the adopted Local Plan. Therefore, the additional growth concentrated in this area can potentially facilitate improved infrastructure, services and public transport through the economies of scale generated.

*Table 1 Accessibility to facilities and public transport*

Reference	Accessibility to Local Facilities	Public Transport
HFA-3	Green	Yellow
BAR-1	Green	Green
EXH-14	Green	Green
ABB-4	Green	Yellow
BED-6	Green	Yellow
ARB-1	Yellow	Green
ABB-5	Green	Green
KIN-2	Green	Yellow
EXH-1	Yellow	Red
ABB-7	Green	Green
ABB-8	Green	Green
ABB-6	Green	Green
ABB-2	Green	Yellow
GAL-7	Yellow	Yellow

Several sites have been proposed for ‘de-allocation’, including strategic sites at ‘The Woodlands’ and ‘East of Bulkington’. Benefits in terms of social infrastructure would not be realised at the Woodlands (as per existing policy HSG4), meaning that a new local school, open space improvements and other facilities would not be delivered. Likewise, financial contributions associated with East of Bulkington (as per existing policy HSG7) would not arise. In terms of social outcomes, the effects are therefore less positive in respect of these two locations in particular. Conversely, some residents may have had amenity concerns and the omission of these sites would resolve these. On balance, negative effects are predicted though in terms of social outcomes. Piecemeal development is considered less likely to deliver the same benefits as strategic growth.

The Borough has the highest levels of deprivation across Warwickshire ranking 101<sup>st</sup> most deprived local authority district nationally (out of 317)<sup>15</sup>. In this context some of the additional allocations such

<sup>14</sup> [Nuneaton & Bedworth Borough Council Borough Plan Monitoring report \(2020-2021\)](#)

<sup>15</sup> Index of Multiple Deprivation (2019)

as KIN2, ABB6, ABB7 and ABB8, fall within the 10% most deprived neighbourhoods in the country) are likely to engender positive effects. The allocations will provide residents with more housing options including more affordable tenures with positive knock on effects on health and employment leading to improved living conditions and incomes.

Policy H2 (Affordable housing) is likely to have favourable effects as it seeks 25% AH on plots of 15 or more dwellings or 2 units on schemes of 10-14 dwellings split 26% intermediate tenures to 74% social/affordable rents. The provision is required on site of development. Policy HS2 (Strategic accessibility and sustainable transport) requires development to ensure adequate accessibility to all principal modes of transport and be well connected to strategic facilities and maximise sustainable transport achieving a 15% minimum modal shift.

A range of plan policies will continue to have benefits with regards to social factors, particularly those that support high quality design, environmental enhancements, retention and improvement of community facilities. In terms of amendments, the main benefits are likely to arise in relation to climate change resilience (which ought to have knock on benefits in terms of social factors).

Overall, mixed effects are predicted with regards to social factors. The additional allocations and policies seeking accessible affordable housing and integrated sustainable transport infrastructure are anticipated to have positive effects on social factors. The focus of development in deprived areas is also likely to create positive effects through provision of more housing choices, new infrastructure, attractive public realm, services and employment opportunities. Whilst some of the sites are currently in areas with limited accessibility, when these are considered along with existing plan allocations, the proposed overall growth is likely to facilitate improve infrastructure and services which would improve accessibility and connectivity. Together, these constitute **moderate positive effects**.

Where strategic sites have been removed from the adopted Plan, the social benefits that would have arisen in these locations will no longer arise. In this respect, **minor negative effects** are predicted. Existing communities might not benefit from new facilities, but ought not to see a major change for the worse.

### **Appraisal of reasonable alternatives**

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

#### Option 2: Continuation of existing strategy

Under this approach, **neutral effects** would be expected alongside some **minor negative effects**. No additional site options would be necessary, and the sites that are currently adopted would continue to be supported. The majority of sites are functionally connected to the built-up areas of the Borough, ensuring accessibility and greater opportunities to reduce deprivation through access to a higher density of jobs, amenities and services. That said, where some sites have not looked likely to come forward for housing over the current plan period, future housing delivery may be restricted by the potential for sites to continue to be allocated despite deliverability concerns, potentially leading to the aforementioned negative effects.

### Option 3: Strategic location focus

Strategic growth at Galley Common would be likely to direct growth away from some current allocations, pulling development and its associated infrastructures from more deprived areas (largely within Nuneaton and Bedworth's built-up areas) and directing it to an area which is less deprived (Galley Common). That said, this area of strategic growth may still provide some benefits to surrounding pockets of deprivation, especially to the south of the railway line. The large growth would be likely to improve the accessibility of the area, through increased provisions of shops and services as well as improved sustainable travel options linked to the development. In relation to housing, whilst a large strategic site may offer some concerns relating to deliverability and locational choice, this would be expected to be of a similar magnitude to the concerns relating to a lack of historic delivery on existing allocations. A large site may offer the opportunity to improve design led solutions to crime and disadvantaged communities, such as green and open space and recreation facilities. Overall, mixed **minor positive** and **minor negative** effects are likely.

Strategic growth to the north of Nuneaton would be expected to see effects aligned with those set out under Option 3a (strategic growth at Galley Common). As such, mixed **minor positive** and **minor negative** effects are likely.

### Option 4: Increased dispersal in the urban areas

At an increased scale of growth, there is a range of additional sites within the existing urban areas that could be allocated (compared to option 1). This approach would be unlikely to divert growth away from more deprived areas as the site options include an array of sites within more deprived areas. Housing delivery could see an increase in viability due to the potential to replace sites which may have deliverability concerns with sites which may offer a more feasible site to develop. Most sites options are within the built-up area and hence would benefit from local shops and services in some instances, as well as there being an increased potential to allocate sites nearby to public transport access nodes. That said, this option would be less likely to offer focused sustainable transport routes or services, due to the more dispersed nature of potential allocations. In terms of design, including open space provision and measures to improve safety (including crime), this option would be unlikely to deliver large scale improvements, though the anticipated delivery would be likely to be broadly aligned with that which would occur as part of the existing plan. Overall, **moderate positive effects** are predicted as the scale of growth would allow for greater flexibility in meeting housing needs. Whilst the potential for strategic infrastructure to be secured as part of large scale development would be more limited, the spread of growth across the urban areas should ensure that new development is well located in terms of services and could benefit deprived communities.

### Option 5: Dispersal plus strategic focus

A strategic focus of growth to the west of Galley Common alongside the sites (and associated effects) which are seen under Option One would be anticipated to deliver an increase in accessibility for the area and its surrounding communities, this would be expected to be realised through the delivery of new and improved sustainable transport options as well as an increase in local employment, shops and services. The site would be likely to deliver recreational facilities and a high standard of design which may improve place-making and potentially help to deter crime. The uplift in housing delivery would be beneficial for the Borough, with the diversified selection of sites offsetting potential delivery risks which can be associated with strategic growth. Whilst the strategic growth would not be in an area of especially heightened deprivation, the smaller sites within the existing built-up area would help to provide more affordable housing which may alleviate some potential housing pressures. Overall, this approach would be likely to offset some of the potential negative effects seen under

Option 3a and provide more positive effects which are associated with Option 3a. It would therefore be likely to result in **moderate positive effects**.

Option 5b would largely mimic that set out under Option 5a, though with the strategic growth and its associated effects concentrated towards the north of Nuneaton. Overall, this would be likely to result in **moderate positive effects**.

**Appraisal summary table (Social Factors)**

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Mod +ve	Minor -ve
2) Existing strategy rolled forward	660 dpa	Neutral	Minor -ve
3a) Strategic focus (Galley Common)	680 dpa	Minor +ve	Minor -ve
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor +ve	Minor -ve
4) Increased dispersal in the urban areas	710 dpa	Moderate +ve	
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Moderate +ve	
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Moderate +ve	

**Option 1: Urban dispersal**

The Borough supports a range of species and habitats. In terms of designated biodiversity sites; there is one European site (Ensor's Pool Special Area of Protection SPA), two Sites of Special Scientific Interest (SSSI) (Ensor's Pool and Griff Hill Quarry) and three Local Nature Reserves (LNR) (Galley Common, Ensor's Pool and Bedworth Sloughs). Generally, the proposed residential sites are not predicted to give rise to significant effects on the above sites with the exception of the residential development site at Kingswood recreation ground and Kingswood Rd. (KIN2) which are adjacent to Galley Common LNR. The latter represents an easily accessible natural area noted as being particularly beneficial for education<sup>16</sup>. The proposed housing sites in this location are adjacent to the LNR which may produce additional disturbance pressures on ecology within the LNR. Similarly, site BAR-1 (mixed residential / employment) is over 1km from Ensor's Pool LNR and separated from it by existing development and roads and therefore not anticipated to produce significant effects on the LNR.

In terms of employment sites, site WEM3 is around 1km away from the Ensor's Pool LNR, however this 3.5 ha employment site (on Coventry Rd.) is separated from the LNR by the railway line, the A444 and existing development therefore there are no direct pathways for the proposed site to impact the LNR. Similarly, the employment sites EHX13 and EMP2 are not expected to have direct impacts on the Bedworth Slough's LNR as they are 3km and 2km away, respectively, and separated by major highways and existing development.

There are several tree preservation orders in the vicinity of proposed residential, mixed and employment sites (BAR-1, EHX14, BED-4, NUN263 and ABB-7) whilst these are protected through the TPO, insensitive design can reduce the amenity value of such trees and /or harm them.

There are also some local features such as trees, hedgerows and watercourses where development sites could lead to some disturbance. For example:

- GAL7 is adjacent to a 'destination park', and contains habitat on the edge of the site boundary associated with Bar Pool Brook. There are no designated habitats, but there is potential for some minor negative effects in terms of increased disturbance from residential development.
- POP2 is a canal side environment, which contains some vegetation, but is generally not considered to be of high value for biodiversity. Sensitive development is therefore unlikely to have a significant effect.

The proposed approach no longer involves development on several strategic sites within the current adopted plan (i.e. East of Bulkington and Woodlands). Whilst neither of these sites are nearby to designated wildlife sites, they are both greenfield and do contain local features such as hedgerows, trees and water courses. No longer developing these areas is therefore likely to lead to slightly less negative effects compared to the adopted local plan.

In terms of the Borough Plan Review policies; NE3 (Biodiversity and geodiversity) seeks to conserve ecological networks and services including locally designated biodiversity sites. Where adverse impacts are likely, a mitigation strategy to halt and reverse biodiversity loss and achieve a minimum 10% net gains, would be required. DS1 (Presumption in favour of suitable development) supports

<sup>16</sup> TEP report: Nuneaton and Bedworth Landscape Character Assessment

environmental protection, the planting of trees and orchards. Policy DS3 (Development principles) requires all new development to be sustainable and to provide environmental mitigation and enhancement. The policy includes reference to the ten characteristics of the National Design Guide which includes the requirement to: prioritise nature so that diverse ecosystems can flourish and to support and enhance biodiversity (Nature enhanced and optimised characteristic).

Policy HS2 (Strategic accessibility and sustainable transport) addresses the transport implications of new development, requiring these demonstrate suitable demand management measures, maximise connectivity to strategic facilities and maximise sustainable transport options including walking and cycling. The policy sets a target of 15% (minimum) modal shift to non-car uses. Policy BE3 (Sustainable design and construction) requires development proposals to include the provision of trees and promote sustainable transport.

When considered on their own the new site allocations are not expected to give rise to significant effects on biodiversity. However, given the cumulative growth proposed at strategic level, negative effects are possible in terms of disturbance to local wildlife. The effects will likely be moderated by BPP0 policies seeking to conserve and enhance biodiversity, and are also offset to an extent by the de-allocation of two strategic sites. Therefore, residual effects would likely be **neutral**. Where biodiversity net gains are achieved, longer term effects would be **positive**. Given that the majority of sites are unlikely to have a high biodiversity value as a starting point, it is considered that net gain ought to be possible to achieve on most of the sites themselves. The smaller scale nature of the sites could mean that strategic opportunities for net gain are more limited though.

### **Appraisal of reasonable alternatives**

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

#### Option 2: Continuation of existing strategy

Under this approach, **neutral effects** would be expected. No additional site options would be necessary, and the sites that are currently adopted would continue to be supported. There are no major biodiversity constraints on these sites. Taking account of the Plan policies, the position in the longer term could be positive if net gains are achieved.

#### Option 3: Strategic location focus

Further strategic growth to the north of Nuneaton is not within close proximity to any designated habitats, but there are parcels of priority habitat scattered nearby that could potentially be negatively affected. Effects would be anticipated to be minor though and given the strategic nature of development should be possible to avoid entirely. As such, neutral effects are predicted overall. As per the other options, when taking plan policies into account, the longer term effects could be positive if net gain is achieved.

Strategic growth at Galley Common would not be likely to have direct effects on designated wildlife habitats as there are none adjacent to the site or with notable pollution pathways. However, there are swathes of land in this location that are currently under countryside agreements, which often include measures to manage biodiversity. There is a presumption that with development any biodiversity value could be adversely affected. However, the strategic nature of development should enable sensitive areas to be avoided and for new green infrastructure to be introduced. As

such, neutral effects are predicted overall. As per the other options, when taking plan policies into account, the longer term effects could be positive if net gain is achieved.

Option 4: Increased dispersal in the urban areas

At an increased scale of growth, there is a range of additional sites within the existing urban areas that could be allocated (compared to option 1). Broadly speaking, there are sufficient sites with limited biodiversity sensitivities to allow for a higher scale of growth to be accommodated whilst still not giving rise to significant negative effects. As such, neutral effects are predicted for option 4.

Option 5: Dispersal plus strategic focus

The addition of a strategic location to dispersed growth in the urban areas is predicted to have neutral effects for both North of Nuneaton and Galley Common locations. Individually, none of the sites or broad locations are significantly constrained with regards to biodiversity, and cumulatively the effects would not be considered to lead to negative effects on the overall condition of biodiversity across the Plan area. As such neutral effects are predicted for 5a and 5b.

**Appraisal summary table (Biodiversity)**

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	Neutral
2) Existing strategy rolled forward	660 dpa	Neutral
3a) Strategic focus (Galley Common)	680 dpa	Neutral
3b) Strategic focus (North of Nuneaton)	680 dpa	Neutral
4) Increased dispersal in the urban areas	710 dpa	Neutral
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Neutral
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Neutral

The additional sites proposed for growth are broadly located in areas that are not constrained by biodiversity designations or the presence of important habitats. Alternative options whether these be sites or strategic locations are also not overly sensitive and for all of the locations, it ought to be possible to avoid negative effects, apply mitigation and achieve net gain. This remains the case if the overall scale of growth increases, as cumulatively the effects are not thought likely to be significant. Therefore, for all options **neutral effects** are predicted. This also takes account of the existing plan policies and proposed amendments, which would continue to help guide development. In the longer term, for all options **positive effects** should arise if net gain is achieved, with perhaps greater potential to achieve this at strategic locations.



**Option 1: Urban dispersal**

Nuneaton and Bedworth has the highest levels of deprivation across Warwickshire, ranking 101<sup>st</sup> most deprived local authority district<sup>17</sup> nationally (out of 317). Several of the additional residential site allocations (KIN2, ABB6, ABB7 and ABB8) fall within deprived areas (amongst the 10% most deprived in the country). Allocating new dwellings here has the potential to provide additional affordable housing that is accessible and well located with respect to services, education and employment opportunities. Residents in deprived areas can often be prevented from accessing suitable housing options so providing additional well designed housing in such locations can provide residents with more housing options including more affordable tenures with positive knock on effects on health and employment leading to improved living conditions and incomes.

With regards to accessibility, all of the sites with the exception of ARB, EXH1 and GAL7 are within close proximity to a range of services and facilities. This should enable and encourage active modes of travel, which are positive in terms of health and wellbeing. Plan policies seeking provision of accessible cycle routes, footways and on-site bus infrastructure and allocating sites for mixed residential and employment uses should also help in this respect.

Several additional proposed sites are intercepted by PRoWs (KIN-2, EXH-1, ABB2, GAL-7) which could potentially lead to the paths being lost or changed beyond recognition. This is likely to adversely impact activities such as walking, cycling and horse riding unless specific measures are taken to retain or create new PRoWs. In this respect, policy DS3 could be helpful as it requires new development to comply with Building for a Healthy Life principles which promote the integration of walking, cycling, public transport, and green and blue infrastructure into new development leading to beneficial effects on physical and mental wellbeing.

However, this is addressed in Policy SA1 (development principles on strategic sites) which seeks to protect existing PRoWs stating that these should be incorporated into new development wherever possible. The policy also promotes accessible new community, sport, physical activity and play facilities. This doesn't apply to newly allocated sites, and it is recommended that it is.

Policies H1 (Range and mix of housing) and H2 (Affordable housing) seek to provide an appropriate mix of housing types, sizes and tenures (including intermediate tenures and social/ affordable rents) to meet assessed needs over the Plan period. This is to include housing suited for older people such as, extra care and residential care homes. These would be required to comply with accessibility standards; M4(3) building regulations or higher. The policy is predicted to have positive effects on health and wellbeing as it is likely to allow residents to continue living near to their current homes, friends and family and to lead more independent lives for longer.

Policy BE3 (Sustainable design and construction) seeks to provide safe, inclusive, accessible and healthy environments for all through placemaking strategies and adherence to the National Model Design Codes' ten characteristics. The latter promote attractive/ distinctive and accessible design, safe, social and inclusive public spaces and healthy, functional homes.

Mixed effects are anticipated overall, the regeneration of deprived areas and policies seeking well designed, accessible homes of varied types and tenures (including affordable homes) along with policies seeking provision of green/ blue infrastructure and sustainable transport, are likely to produce

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<sup>17</sup> [Indices of deprivation 2019](#)

positive effects on population and human health. The additional sites proposed for allocation are generally well located and should have good access to health facilities and other services (by active modes of travel). In combination, **moderate positive effects** are predicted.

On the other hand, some of the additional sites could affect Public Rights of Way, there is some loss of open space, and some development is proposed in close proximity to AQMAs. These could all lead to negative effects, but taking plan policies into account there is potential for these to be mitigated. As such, only **minor negative effects** are predicted overall.

### **Appraisal of reasonable alternatives**

#### Option 2: Continuation of existing strategy

Under this approach, no additional site options would be necessary, and the sites that are currently in the adopted plan would continue to be supported. The majority of sites are functionally connected to the built-up areas of the Borough, providing opportunities to reduce deprivation through better access to jobs, amenities and services. However, this option does not include the regeneration sites in Nuneaton's town centre which is within the 10% most deprived areas in the country. Therefore, this option will not realise the benefits that could otherwise be achieved from some of the areas that are in the most need for investment and regeneration. Consequently, **neutral effects** are likely as a result.

#### Option 3: Strategic location focus

This option directs growth to a strategic location at Galley Common, which is amongst the 30% least deprived neighbourhoods in the country. Whilst the large scale of development could potentially produce more affordable housing and local services it could divert investment away from more deprived areas of the Borough. It is also relatively remote from the main centres of employment and services and therefore less likely to facilitate improved access to jobs and services (though some local facilities would be expected to be secured). This approach would not involve urban dispersal to the same extent as Option 1 and thus lacks the positive effects associated with such allocations. Several public rights of way could also be severed or adversely affected as a result of development in this location, as well as there being a loss of greenspace. Overall, mixed effects are predicted. There ought to be some **minor positives** relating to new development and accompanying services. However, there would be a loss of greenspace, PROWs and accessibility to services might not be ideal. As such **minor negative effects** are predicted.

Under option 3b, strategic growth is proposed north of Nuneaton. This location broadly sits within the 30% and 10% least deprived areas nationally and therefore is less likely to address deprivation issues currently experienced within the Borough. Again, these sites are likely to facilitate more affordable housing due to the larger scale but they are relatively distant from the main strategic employment locations. Several public rights of way and greenspace could also be severed or adversely affected as a result of development in this location. Overall, **minor negative effects** are likely as this option could divert investment away from the most deprived areas and is less likely to provide improved access to the main employment sites. There ought to be some **minor positives** relating to new development and accompanying services.

#### Option 4: Increased dispersal in the urban areas

This option includes development within the most deprived areas of the Borough (amongst the 10 – 20% most deprived in the country) such as at central Nuneaton. The majority of allocated sites are

well connected to the rest of the Borough and in close proximity to main centres of employment and services. The additional housing provision under this option is likely to create more housing choice in the market including the provision of affordable housing. Therefore, **moderate positive effects** are predicted as the development will include investment in the most deprived areas of the Borough, improving access to jobs and services and the additional growth will generate improved/ new infrastructure and produce more housing choice including affordable homes. Given the dispersed nature of growth within the urban areas, the effects on greenspace, PROWs and the capacity of healthcare services ought not to be an issue. However, the opportunity to secure strategic improvements may also be more limited.

Option 5: Dispersal plus strategic focus

This option (5a) would still produce the same positive effects discussed for the previous option as it would include development in the most deprived areas of the Borough. The substantial additional site at Galley Common is not within a deprived area ( amongst the 30% least deprived) but the large site is likely to produce more affordable housing, new infrastructure and community benefits. On balance this option is anticipated to engender **moderate positive effects** due to the investment in deprived areas and higher growth likely to produce more affordable housing and community benefits such as green space and enhanced healthcare provision.

Option 5b is likely to have similar effects to 5a, with two large strategic sites at the northern boundary of the borough. Though the effects are broadly similar this option is slightly preferable as the strategic sites allocated are less remote than in 5a with better access to central Nuneaton and the main highways network but overall are expected to be on par with option 5a namely **moderately positive** overall.

**Appraisal summary table (Population and Human Health)**

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Moderate +ve	Minor -ve
2) Existing strategy rolled forward	660 dpa	Neutral	
3a) Strategic focus (Galley Common)	680 dpa	Minor +ve	Minor -ve
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor +ve	Minor -ve
4) Increased dispersal in the urban areas	710 dpa	Moderate +ve	
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Moderate +ve	
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Moderate +ve	

**Option 1: Urban dispersal**

In addition to sites that are currently allocated in the existing local plan, an additional range of sites are proposed, which cover a mix of greenfield and brownfield sites. Sites GAL7, EXH3 and BED6 include less than 10ha of Grade 3 agricultural land in total, some of this potentially includes Grade 3a, best and most versatile (BVM) agricultural land. Developing these sites would have negative effects, through a direct loss of soil resources. This could include good quality (BVM) agricultural land if the Grade 3 areas are found to be Grade 3a (rather than 3b).

Conversely, positive effects are predicted through the remediation of sites with potential contamination issues such as BED6, ABB6-8, STN1 and ARB3.

Furthermore, strategic sites 'the Woodlands' and 'East of Bulkington' are proposed to be de-allocated, which reduces the likely loss of soil resources that would have occurred here (approximately 40ha of grade 3 land).

Policy DS3 is likely to have favourable effects on preserving BVM agricultural land as it prioritises previously developed and underutilised land for new development. The policy also limits development outside settlement boundaries to agricultural, forestry and leisure uses.

In conclusion, the allocation of greenfield sites (strategic and non-strategic) comprising BVM agricultural land will have very small negative effects on soil resources. However, in the context of the quantity and quality of soil resources across the authority and in the surrounding areas, the effects are not considered to be significant. This is helped by the de-allocation of several sites that also contain agricultural land and would mean that the residual position is one of less soil resources being affected. Furthermore, there are several plan policies that prioritise previously developed land, including the remediation of potentially contaminated sites. Consequently, **minor positive effects** are predicted overall.

Allocated sites that contain agricultural land ought to be surveyed prior to development to confirm which contain best and most versatile land (if any). Where resources are identified, they should be avoided and preserved as much as possible (presuming there are parts of the sites that are of a lower quality). It is acknowledged this may be difficult given the small scale of the sites involved, but perhaps community allotments or gardens could be introduced.

**Appraisal of reasonable alternatives**

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Neutral effects are predicted as the situation would likely remain the same with regards to a loss of agricultural land at allocated strategic sites in particular. There is an element of uncertainty given that development in these locations has not been forthcoming (i.e. this could lead to speculative development elsewhere on higher grades of agricultural land).

### Option 3: Strategic location focus

Opportunity areas near to Galley Common are classified as Grade 3 agricultural land, but it is unclear whether this is Grade 3a or 3b. Nevertheless, a loss of greenfield land would arise as a result of this strategy, some of which could be of a higher grade than land at 'The Woodlands'. Therefore, potential minor negative effects are predicted.

Additional growth to the north of Nuneaton would overlap with areas of Grade 3 land. More granular surveys have been undertaken in parts of this location suggesting that much of the land is Grade 3b. However, there are parcels of Grade 3a and Grade 2 land that could also be affected. If growth in this location was proposed to 'replace' needs that would not be met at allocated sites in the current adopted Plan, then minor negative effects would arise (given that the land appears to be of a slightly higher quality).

### Option 4: Increased dispersal in the urban areas

With increased dispersal it is more likely that additional greenfield sites would be required within and on the periphery of the urban area. This could lead to some minor negative effects with regards to soil and land resources. However, several sites in the urban area do not consist of agricultural land and so the extent of effects could be limited despite additional growth. In this respect, neutral effects are predicted (particularly when factoring in that soil resources on de-allocated sites would be 'protected').

### Option 5: Dispersal plus strategic focus

Dispersal on sites in the urban area would have some positive effects as discussed for Option 1. However, the addition of a strategic location for growth whether this be at Galley Common or North of Nuneaton would lead to a slight increase in the amount of soil resources lost to development. Therefore, minor negative effects are predicted.

### **Appraisal summary table (Soil)**

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	Minor positive
2) Existing strategy rolled forward	660 dpa	Neutral <sup>?</sup>
3a) Strategic focus (Galley Common)	680 dpa	Minor negative
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor negative
4) Increased dispersal in the urban areas	710 dpa	Neutral <sup>?</sup>
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Minor negative
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Minor negative

**Option 1: Urban dispersal**

The majority of new proposed sites are in areas of low flood risk (Flood Zone 1) and therefore the potential for pollution issues associated with flooding are considered to be limited in this respect. Where sites are within flood zones 2 and 3 (for example ABB7, ABB6) the potential for pollution is higher, but several plan policies should help to mitigate negative effects. This includes policies that seek to improve resilience to climate change and to implement green infrastructure (i.e. policies DS1, DS3, SA1 and BE3). Policy NE4 will also be important as it requires the incorporation of sustainable drainage (SuDS) systems to manage surface water run-off, and there are likely to be knock on benefits with regards to water quality. On balance, neutral effects are predicted.

None of the proposed additional sites fall within groundwater source protection zones, and therefore in this respect, neutral effects are predicted in terms of water quality. Likewise, development at such sites is considered unlikely to lead to direct pollutant run-off into watercourses (the majority of sites are distant from watercourses).

In terms of wastewater treatment, the location of newly identified sites in the urban area in a dispersed manner (and the relatively low total amount of new homes) should mean that existing facilities can accommodate growth without negative effects on water quality. The dwellings per annum in the preferred options plan is actually lower than the current adopted Plan, and so in this respect there ought to be limited pressures on wastewater infrastructure as a result of the Plan review.

Policy BE3 is likely to have minor positive effects in terms of conserving water resources as it calls for development to include rainwater harvesting and to maximise water efficiency so that it meets the higher standard for buildings regulations with regards to water efficiency (110 litres/person per day).

Overall, the preferred options draft Plan is predicted to have mostly neutral effects with regards to water quality, but some improvements in policy requirements relating to water efficiency mean that **minor positive effects** could arise in the longer term.

**Appraisal of reasonable alternatives**

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Overall, this option is predicted to have mostly neutral effects with regards to water quality and flood risk (given that no changes to site allocations are proposed), but some improvements in policy requirements relating to water efficiency mean that **minor positive effects** could arise in the longer term.

Option 3: Strategic location focus

Further strategic growth to the north of Nuneaton could be accommodated within areas classed as flood zone 1. However, there are parts of this location that are intersected by flood zones 2/3. It would be expected that such areas could be avoided as well as measures taken to secure sustainable

drainage. However, the potential for negative effects is slightly higher compared to the Galley Common location. This brings some uncertainty. As with any of the options, greater requirements in relation to natural resources should lead to **minor positive effects** in the longer term in terms of water use and quality.

Strategic growth at Galley Common would fall within areas at risk of flood zone 1. Development would be expected to implement sustainable urban drainage systems and in line with plan policies would need to secure sufficient utilities infrastructure and avoid water pollution. In this respect, neutral effects on water quality are expected. As with any of the options, greater requirements in relation to natural resources should lead to **minor positive effects** in the longer term.

Option 4: Increased dispersal in the urban areas

At an increased scale of growth, there is a range of additional sites within the existing urban areas that could be allocated (compared to Option 1). Broadly speaking, there are sufficient sites in flood zones 1 that allow for a higher scale of growth to be accommodated. The overall scale and dispersal of growth is also considered unlikely to put undue pressure on water treatment facilities. As such, neutral effects are predicted for option 4 in this respect. Some improvements in policy requirements relating to water efficiency mean that **minor positive effects** could arise in the longer term.

Option 5: Dispersal plus strategic focus

The addition of a strategic location to dispersed growth in the urban areas is unlikely to lead to significant effects with regards to water quality, flood risk or water use.

As per all the other options, plan policies ought to mean that development performs better in respect of natural resources including water usage. These are **minor positive effects**.

**Appraisal summary table (Water)**

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	
2) Existing strategy rolled forward	660 dpa	
3a) Strategic focus (Galley Common)	680 dpa	
3b) Strategic focus (North of Nuneaton)	680 dpa	?
4) Increased dispersal in the urban areas	710 dpa	
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	?

**Option 1: Urban dispersal**

The majority of growth proposed in the Plan is already committed or allocated in the adopted Plan. Therefore, additional effects in terms of air quality are not likely to be major given the spread of new development proposed. Furthermore, the majority of new homes will be well located with regards to public transport. Given that the majority of sites are also within the urban areas, this should enable and encourage active forms of travel such as walking and cycling. The level of car trips associated with new development in the urban areas of Nuneaton are therefore considered unlikely to lead to significant effects on air quality. However, some residential development will be in relatively close proximity to existing areas of poor air quality, and could contribute additional pressures as well as exposing residents to poor air quality.

The Borough has two air quality management areas (AQMA) these are located at Leicester Rd. Gyratory and at Central Avenue/ Midland Rd. in Nuneaton. Site ABB6 is adjacent to the Central Av./ Midland Rd. AQMA and Site ABB8 is 240 m respectively from the Leicester Rd. Gyratory AQMA and therefore potentially negative effects are likely in terms of additional pressures.

Several Plan policies should help to mitigate negative effects with regards to air quality.

DS3 (development principles) is likely to have favourable impacts on air quality as it requires all development to be sustainable and contribute to net zero carbon emissions targets. The policy limits development in more remote locations (outside settlement boundaries) to agricultural, forestry and leisure uses which should help ensure residential development is confined to accessible locations close to services and employment.

Similarly, policy SA1 (development principles on strategic sites) is positive as it encourages sustainable travel such as walking and cycling by promoting the integration of public rights of way, pedestrian and cycle links into green/open space networks and the wider area and the provision of cycle parking.

Policy HS1 (Ensuring the delivery of infrastructure) promotes the provision of infrastructure to address new development needs. Whilst the policy requires development to demonstrate how it addresses carbon neutral emissions by 2050 it also supports provision of overnight lorry parking therefore it's likely to produce mixed effects (positive and negative).

Policy H2 (Strategic accessibility and sustainable transport) is positive as it requires development proposals to address accessibility to all modes of transport to drive carbon neutrality, demand management measures, provision of EV charging points, connectivity and maximisation of sustainable transport options. Proposals are required to target 15% modal shift to non-car based travel as a minimum. Similarly, policy BE3 (sustainable design and construction) promotes sustainable transport.

Policy HS2 addresses issues such as air quality requiring proposals to consider cumulative impacts and ensure they do not exacerbate air quality issues including measures such as EV charging points and dust management plans. The policy calls for maximising sustainable transport, setting a modal shift target of 15% as a minimum.

A range of policies that seek to improve the natural environment and green infrastructure are also likely to be beneficial in terms of air quality as green infrastructure can help to mitigate air pollution and to encourage sustainable travel.



Together, the Plan policies are likely to have a positive effect on air quality, and there is a greater emphasis on carbon neutrality in the proposed preferred options version (compared to the existing Adopted Plan). Therefore, it is considered likely that efforts to address air quality will be enhanced as a result of the Plan. Offsetting these benefits is the fact that additional development is proposed in the urban areas, close to air quality management areas. This could bring about some minor negative effects in these particular areas. The magnitude of effects is likely to be limited though, and so overall, the positive effects of Plan policies ought to leave a residual **neutral effect** in terms of air quality.

The Plan policies are generally positive promoting sustainable transport and carbon neutrality by 2050, and the scale of new growth proposed in the urban areas is unlikely to lead to significant increases in traffic and congestion. Any negative effects are also likely to be counteracted by the spatial strategy which focuses residential and employment growth within existing urban areas and the anticipated increase in the take-up of electric vehicles.

Where residual negative effects arise in specific locations, these could be further mitigated through the implementation of low emission zones in areas of poor air quality (AQMA) and car free developments in such areas where feasible.

### **Appraisal of reasonable alternatives**

#### Option 2: Continuation of existing strategy

Under this approach, **neutral effects** would be expected as most of the proposed growth is already allocated in the adopted Plan making additional significant effects in terms of air quality unlikely. Furthermore, focussing growth within the urban areas, should facilitate active forms of travel such as walking and cycling. Therefore, the level of car trips associated with new development in the urban areas of Nuneaton are unlikely to lead to significant effects on air quality. However, some residential development will be in relatively close proximity to existing areas of poor air quality, and could contribute additional pressures as well as exposing residents to poor air quality but the magnitude of effects is likely to be limited though given the mitigation measures in Plan policies such as HS2.

#### Option 3: Strategic location focus

Further strategic growth to the north west of Nuneaton is likely to lead to increased car journeys due to the relative remoteness of the site from main locations of employment and services. Development could also add more car trips to routes into Nuneaton with a possibility of increased congestion through the AQMA within central Nuneaton.

However, some of the adverse effects will be offset by the scale of development which would provide more scope for integrating sustainable transport infrastructure (walkways and cycleways) and may produce the economies of scale required to produce enhanced public transport services. As such, minor **negative effects** are predicted overall.

The strategic growth sites north of Nuneaton benefit from a better location than the Galley Common site in the previous option. These have good access to the highway network and relatively close to the major employment and services provision within central Nuneaton. The large scale of the sites would produce the same benefits highlighted in the previous option. However, the sites are relatively remote from the main employment areas south of the Borough which is likely to result in more car journeys to access employment. This leaves residual **minor negative** effects overall, but the likelihood of journeys into Nuneaton (where AQMA exist) itself are likely to be lower compared to strategic growth north of Nuneaton (reducing the likelihood of such effects).

#### Option 4: Increased dispersal in the urban areas

Increased growth is more likely to lead to increased car journeys, though this is not likely to be significant. The effects would be offset to an extent by the focusing of growth within urban areas of the Borough thus benefiting from existing infrastructure and services. However, an increased scale of growth could possibly lead to increased development near to or within AQMAs, which gives rise to uncertain minor negative effects.

#### Option 5: Dispersal plus strategic focus

Dispersal on sites in the urban area would have some positive effects as discussed for the previous option. However, the additional strategic allocation at Galley Common (option 3a) is likely to lead to increased car journeys due to the relative remoteness of the site. This will be partially offset by the scale of the strategic site which is likely to produce new/ enhanced sustainable transport, resulting in **minor negative** residual effects.

Whilst the strategic sites North of Nuneaton are better located with respect to Nuneaton's town centre than the Galley Common site, they are still relatively distant from the main centres of employment south of the Borough and could also put additional pressure on AQMAs in Nuneaton itself. However, this is counterbalanced by the size of the sites which would be likely to lead to more investment in integrated sustainable transport infrastructure. As such, **minor negative effects** are predicted overall.

#### **Appraisal summary table (Air Quality)**

<b>Strategic option</b>	<b>Approximate Scale of growth</b>	<b>Effects summary</b>
1) Proposed approach (dispersal)	646 dpa	Neutral
2) Existing strategy rolled forward	660 dpa	Neutral
3a) Strategic focus (Galley Common)	680 dpa	Minor -ve
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor -ve
4) Increased dispersal in the urban areas	710 dpa	Minor -ve <sup>?</sup>
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Minor -ve
5b) Dispersal plus strategic focus (North Nuneaton)	710 dpa	Minor -ve

**Option 1: Urban dispersal**

New housing growth is allocated in mostly well located sites within existing built up areas with good access to public transport, employment and services. This should facilitate public transport usage, walking and cycling engendering positive effects on climate change mitigation as it serves to reduce the number and duration of car journeys and facilitates modal shift.

With regards to emissions from the built environment, the additional sites allocated in the Plan are unlikely to present opportunities for district energy schemes (given their relatively small scale). However, it is likely that they will be built to higher standards of design given the enhanced emphasis on climate change in the Plan.

There is a stronger emphasis on climate change throughout the amended Plan, with additional clauses added to several policies encouraging or requiring the use of sustainable materials and contributing to carbon neutrality. For example:

- Policy DS1 requires development to address issues such as the use/ safeguarding of natural resources, adaptation to climate change and to a net zero economy, including the planting of trees and orchards.
- Policy DS3 supports the utilisation of previously developed land and the bringing back into use of underutilised buildings. The latter serves to conserve land resources (e.g. greenfield, open space and agricultural land) and recycle embedded carbon within existing buildings through re-use/ adaptation. Home working is also promoted within the policy which should reduce the need to travel to work. Additionally, the policy requires that development complies with the Building for a Healthy Life<sup>18</sup> design toolkit which comprises 12 principles including the integration of walking, cycling and public transport within neighbourhoods, cycle and green and blue infrastructure. The implementation of these principles within new development is likely to reduce reliance on private cars and facilitate modal shift.
- SA1 clause 16 states that *'new proposals will need to ensure that development includes fundamental mitigation for climate change, carbon reduction leading to neutral emissions by 2050 and for a nature recovery strategy'*. This is reiterated in policies H1 (Range of and mix of housing) and HS1 (Ensuring the delivery of infrastructure). These changes are likely to improve the performance of the rolled forward strategic site allocations in terms of climate change mitigation.
- Policy HS2 (strategic accessibility and sustainable transport) promotes sustainable modes of transport requiring proposals to address accessibility to all modes of transport including demand management measures and maximisation of sustainable transport options to achieve 15% modal shift to non-car based uses.
- Policies BE3 and BE4 seek to conserve non-renewable resources, requiring development to minimise the use of non-renewable resources and waste. Proposals are also required to install rainwater harvesting systems, integrate passive solar design, minimise air, noise, soil and light pollution. Non domestic development is required to meet the Building Research Establishment's Environment Assessment Method (BREEAM) where feasible.

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<sup>18</sup> [Building for a Healthy Life](#)

Considered holistically, the preferred options Plan is predicted to have a positive effect with regards to climate change. The amount of growth per annum is lower than the current Adopted Plan, and additional sites are within the urban areas, which should help to minimise increases in carbon from new development. Furthermore, several policies have been strengthened in relation to sustainable use of resources and carbon neutrality. This should ensure that new development performs better than would be the case at the moment and so **major positive effects** are likely.

With respect to climate change adaptation, whilst the majority of sites are in areas of low flood risk (Flood Zone 1), some of the allocated residential sites are in Flood Zone 2 or 3 (ARB1, ABB3, EXH1, ABB7) which engenders potentially negative effects with respect to climate change adaptation. Several policies will help to mitigate these effects though. For example Policy NE4 (Managing flood risk and water quality) requires site specific flood risk assessments for large developments and the provision of mitigation measures for up to 1% annual flood probability plus an allowance for climate change in flood risk areas. Other measures required are floor levels set no lower than 600 mm above the 1% annual probability plus climate change allowance flood level. The policy also requires the incorporation of sustainable drainage (SuDS) systems to manage surface water run-off. Overall, the negative effects of sites located in flood zones 2 and 3 are partly mitigated through measures introduced in policy NE4.

A range of other Plan policies could also help in respect of climate change resilience, and there have been amendments to several policies to strengthen the focus on climate change. For example:

- DS3 is beneficial as it requires new development to be resilient to climate change and to provide environmental mitigation and enhancement.
- Policy SA1 (Development principles on strategic sites) promotes the retention and enhancement of hedgerows, trees and green infrastructure (GI) which is likely to have multiple beneficial effects in terms of resilience, such as reducing heat island effects, providing shading, reducing rainwater flows into sewer systems thus conserving energy (for pumping and water treatment) and replenishing ground water reserves. The policy also seeks the integration of existing rights of way into green/open space networks and provision of new pedestrian and cycle links to the sider area, secure cycle parking which will encourage active travel.
- The Plan policies promote tree and orchard planting.

When considering the proposed strategy (which is broadly positive in terms of minimising carbon emissions) alongside improvements to policies in relation to climate change resilience and mitigation, it is predicted that **major positive effects** could arise. An element of uncertainty exists as it is uncertain whether measure sin relation to climate change would be firm requirements (especially if scheme viability was affected negatively).

In terms of recommendations, the Plan could benefit climate change resilience further by promoting car-free neighbourhoods in appropriate circumstances.

## **Appraisal of reasonable alternatives**

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

### Option 2: Continuation of existing strategy

Neutral effects are anticipated with regards to planned development as there would be a continuation of allocations in the Adopted Plan. However, as per Option 1 there would still be an enhanced focus on climate change mitigation and resilience through the updated policies. At strategic sites, it is possible that strategic enhancements could be achieved in relation to climate change resilience and also economies of scale to implement low carbon technologies. Overall, potential major positive effects are predicted.

### Option 3: Strategic location focus

Development at strategic sites could potentially bring opportunities to achieve strategic enhancements to green infrastructure, helping with regards to climate change resilience. There may also be good potential for delivering economies of scale in terms of climate change mitigation measures. In terms of emissions from transport, the strategic locations are on the periphery of the urban areas, and could encourage car travel. However, it is likely that there could be some improvements to public transport secured as part of strategic growth. Considering the proposed improvements to a range of plan policies, it is therefore predicted that potential major positive effects could arise for both locations. The Galley Common location could bring additional benefits if development helps to support the reopening of a passenger rail station in this location. However, this has uncertainties.

### Option 4: Increased dispersal in the urban areas

The additional growth in the urban areas ought to be relatively well connected with regards to public transport, local services and employment. The level of growth involved is not enough to give rise to significant increases in emissions, and given the enhanced focus on climate change resilience and mitigation it is likely that new development should lead to an overall improvement with regards to climate change mitigation and enhancement (for example by supporting low carbon development and green infrastructure throughout the urban areas. These are potential major positive effects.

### Option 5: Dispersal plus strategic focus

A mixed approach will bring benefits in terms of brownfield regeneration and well located urban sites, whilst also supporting new sustainable communities at a strategic location. Coupled with the enhanced focus on climate change mitigation and resilience in the revised policies, this is predicted to have potential major positive effects.

**Appraisal summary table (Climatic factors)**

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	Major +ve ?
2) Existing strategy rolled forward	660 dpa	Major +ve ?
3a) Strategic focus (Galley Common)	680 dpa	Major +ve ?
3b) Strategic focus (North of Nuneaton)	680 dpa	Major +ve ?
4) Increased dispersal in the urban areas	710 dpa	Major +ve ?
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Major +ve ?
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Major +ve ?

**Option 1: Urban dispersal**

The additional site allocations include a mix of brownfield and greenfield land. In terms of land resources, the focus on urban areas and PDL is positive as it serves to recycle brownfield / PDL sites. Though there are some greenfield land sites proposed for allocation, the total amount of land involved is not substantial. Furthermore, de-allocating the 'East of Bulkington' and 'The Woodlands' strategic sites means that these large greenfield sites would no longer be earmarked for development.

Several plan policies support the use of brownfield land, such as Policy DS3 (development principles) which prioritises the utilisation of previously developed land and the bringing back into use of underutilised buildings. This serves to recycle land and embedded carbon within existing buildings through re-use/ adaptation. The focus on brownfield land is greater compared to the existing adopted version of Policy DS3.

Policy H1 (Range and mix of housing) is also positive as seeks the provision of homes for older people which allows older residents to downsize to more manageable dwellings freeing up larger homes for families, which helps reduce underoccupancy and improve flexibility/ choice in the market.

Policies BE3 (Sustainable design and construction) and BE4 are also likely to have positive effects as they seek to conserve non-renewable resources, requiring development to minimise the use of non-renewable resources, harvest rain water and minimise air, noise, soil and light pollution. BE3 also promotes sustainable construction requiring that development utilise waste as resource to be re-used, recycled or recovered. The focus on climate change mitigation and the sustainable use of resources is also strengthened compared to the existing versions of these policies in the Adopted Local Plan.

SA1 has also been amended so that the strategic sites need to consider the sustainable use of resources.

Overall, there is a focus on the use of brownfield land and buildings, and several policies are proposed that seek to ensure that natural resources are used efficiently. This gives rise to positive effects with regards to material assets, but these are offset somewhat by the proposed use of some greenfield land. Therefore overall, **minor positive effects** are predicted.

**Appraisal of reasonable alternatives**

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

**Neutral effects** are predicted as the situation would likely remain the same with regards to the amount of land and buildings being recycled. There are several plan policies that seek to encourage brownfield land use and use of natural resources. However, several of relevant policies have remained largely unchanged from the adopted Local Plan and therefore effects would be expected to be limited without an accompanying change in land use strategy.

### Option 3: Strategic location focus

Under both approaches, there would be a use of strategic locations that comprise greenfield land. In this respect, negative effects are predicted. However, it would be possible to avoid greenfield land development at de-allocated sites, so the net effect is predicted to be neutral in this respect. There are several plan policies that promote the reuse of brownfield land and the efficient use of natural resources, but no direct effects are identified in terms of prioritising previously developed land. There will also be a requirement for significant infrastructure to support strategic growth, which would involve significant use of natural resources. Therefore, overall **neutral effects** are predicted.

### Option 4: Increased dispersal in the urban areas

With increased dispersal and a higher scale of growth it is more likely that additional greenfield sites would be required within and on the periphery of the urban area (as well as the brownfield sites being promoted). This could lead to some negative effects with regards to the loss of greenfield land and use of natural resources in construction.

This would be offset by the fact that brownfield land sites would still be promoted in the urban areas and the plan policies would promote efficient use of natural resources in new developments. Therefore, overall **neutral effects** are predicted.

### Option 5: Dispersal plus strategic focus

Dispersal on sites in the urban area would have some positive effects as discussed for Option 1. However, the addition of strategic locations for growth whether this be at Galley Common or North of Nuneaton would lead to an increase in the overall amount of greenfield land and natural resources required to support growth. As such, **minor negative effects** are predicted for both options.

### **Appraisal summary table (Material assets)**

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	Minor +ve
2) Existing strategy rolled forward	660 dpa	Neutral
3a) Strategic focus (Galley Common)	680 dpa	Neutral
3b) Strategic focus (North of Nuneaton)	680 dpa	Neutral
4) Increased dispersal in the urban areas	710 dpa	Neutral
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Minor -ve
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Minor -ve



**Option 1: Urban dispersal**

There are numerous heritage assets in Nuneaton, including listed buildings, Scheduled Monuments and Conservation Areas. With a few exceptions, the majority of new site allocations are not constrained by historic environment considerations.

Site ABB-3 is in close proximity to a Scheduled Monument; the Benedictine priory and precinct of St Mary and the Grade II listed St. Mary's Church (mainly Victorian parish church built on the grounds of the original ruins of the medieval priory). Historic England's listing states that '*little remains of the original 12<sup>th</sup> Century church except for massive piers which supported the central tower. These are incorporated within the mainly Victorian parish church now standing on the site*'<sup>19</sup>. The proposed site is well enclosed and separated from the Scheduled monument by existing residential development and mature tree cover, which helps to reduce potential effects on the scheduled Monument. This location also contains the Abbey Conservation Area which includes the wider residential area around Manor Court Road, including Earls Road and Manor Park Road which constitute Nuneaton's first middle-class suburb of the late 19th and early 20th centuries<sup>20</sup>.

Site ABB-3 is also adjacent to the north western boundary of the conservation area and development here would overlook several properties described as being of significant to moderately significant historic value in the Abbey Conservation Area Appraisal. Therefore, moderate negative effects are possible due to proximity to the conservation area.

Sites ABB-7 (Mill St. & Bridge St.), ABB-8 (NUN-217 Vicarage St.) overlap the Nuneaton Town Centre Conservation Area (NTCA). ABB-7 is within mainly within Character Area 3 (Riversley Park and Coton Road) of the NTCA, described as an '*irregular linear area of land mostly lying along the west side of the river Anker, bounded to the west by Coton Road, to the east by Sainsbury's Supermarket and King Edward VI playing field, to the south by the railway line, and to the north by Mill Walk*'<sup>21</sup>. It comprises Edwardian parkland and adjacent post-war gardens along the river Anker and includes housing development facing the park along the west side of Coton Road. This part of the NTCA is described as having several negative features such as some of the buildings on Coton Rd, Reversely House and the car dominated environment along the Ring Road /Coton Road and car parking areas. Therefore, new development on the site has the potential to enhance the character of the conservation area as the proposed site is on PDL and currently comprises several car parking areas, and the Nuneaton Job Centre building on Mill Walk. Redeveloping this site as part of a regeneration scheme can potentially have positive effects on enhancing this part of the NTCA but can also have adverse effects if inappropriate design or materials are used in the scheme.

The southernmost portion of Site ABB-8 overlaps character Area 2 (the Civic and Administrative Area) of the NTCA. This PDL site includes Nuneaton Library and car parking areas. The NTCA Appraisal and Management Proposals<sup>22</sup> describes the townscape character as comprising a loose aggregation of large discreet, mostly public buildings from the mid-late 20<sup>th</sup> century in a mixed setting of landscaped open space, car parks, streets, rear servicing areas to shops fronting the Market Place and riverside. The townscape east of this area (where the southern part of site ABB-8 is located) which includes the library is described as being *in transition and lacking coherent identity*. Here again, redevelopment has the potential to enhance the character of this part of the NTCA. However, given the presence of St

<sup>19</sup> Source: [Historic England](#)

<sup>20</sup> Source: [Abbey Conservation Area Appraisal and Management Proposals \(2008\)](#)

<sup>21</sup> [Nuneaton Town Centre Conservation Area Appraisal and Management Proposals \(2009\)](#)

<sup>22</sup> Ibid. page 30

Nicolas Parish Church (Grade I listed) adjacent to this area (along with several other Grade 2 listed buildings), it will be important that development is of an appropriate scale, height, massing and design. The indicative capacity proposed suggests that development would need to be relatively dense, so there is potential for negative effects if this is overbearing. However, the poor condition of this part of the town should mean that positive effects are more likely than negative ones.

The proposed strategy proposes the de-allocation of the existing strategic sites at 'The Woodlands' and 'East of Bulkington'. These sites are not sensitive from a cultural heritage perspective, and so neutral effects are predicted (i.e. removing them will not have an effect on the historic environment).

Several existing plan policies ought to help mitigate potential effects of new development locations. For example, Policy BE4 (Valuing and conserving our historic environment) is highly relevant as it seeks to sustain and enhance the borough's heritage assets such as listed buildings and conservation areas and settings of townscapes. Development affecting designated and non-designated heritage assets will be *'expected to make a positive contribution to its character, appearance and significance'*.

Under this policy, applications affecting the significance of heritage assets will be required to include an assessment of the likely impacts on the heritage assets, their importance and settings, to a level of detail commensurate with the importance of the asset(s). These are to be informed by existing reports/ assessments including Conservation Area Character Appraisal and Management Plans.

Policies DS1 (Presumption in favour of sustainable development), DS3 (Development principles) require all new development to sustain and enhance the historic environment. New development will be prioritised on previously developed land (PDL). Policy DS5 (residential allocations) recognises that some of the non-strategic housing sites have heritage constraints stating that *'the opportunity should be taken to use, enhance and sustain these assets, or in exceptional circumstances, compensating, as part of any development proposal.'*

Policy BE3 (Sustainable design and construction) requires all development to contribute to local distinctiveness and character by reflecting the positive attributes of the neighbouring area, respecting sensitivity to change of character including street layout, residential amenity and built form. Overall, the policies above are likely to have positive effects on the historic environment as they seek to protect and enhance designated and non-designated assets.

Collectively, the Plan Policies discussed should help to mitigate some of the negative effects on cultural heritage that may arise as a result of new development locations. However, there are no further benefits likely to arise beyond the baseline position as there have been no major amendments to any of the policies in relation to heritage.

Overall, mixed effects are predicted (i.e. both positive and negative) whilst sites ABB-3 and ABB-4 could adversely impact the character of the Abbey Conservation Area, the policies discussed above will serve to reduce potential adverse effects, leaving residual **minor negative effects**. The potential for negative effects is also identified associated with site ABB8, which is adjacent to a Grade 1 listed Church. Conversely sites ABB-7 and ABB-8 and the above discussed policies have the potential to enhance the Nuneaton Town Centre conservation Area through regeneration, which is likely to remove some of the negative elements currently impacting the character of the NTCA generating long term **minor positive effects** on the historic environment.

It is recommended that development proposals with potential impacts on conservation areas should provide a detailed heritage impact assessment and include appropriate mitigation measures to minimise adverse impacts. Development at ABB8 needs to ensure that it is of an appropriate height and does not dominate the townscape.

## **Appraisal of reasonable alternatives**

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

### Option 2: Continuation of existing strategy

**Neutral effects** are predicted as the situation would likely remain the same with regards to the sites allocated for development. The policies in the plan that promote the protection and enhancement of heritage would continue to have positive effects, but the baseline position would be unlikely to change significantly given that additional sites are not explicitly allocated for development.

### Option 3: Strategic location focus

The strategic location at Galley Common is unlikely to have direct effects upon heritage assets as there are none overlapping or adjacent to areas that could be developed. The closest designated asset is the Church of St Peter (Grade II). Increased development in the surrounding countryside could affect views from the Church, but this is not vital to the setting of the Church and could be avoided / mitigated through site location, layout and design. Therefore, neutral effects are predicted in this respect.

The strategic location north of Nuneaton is not intersected or within close proximity to any nationally designated heritage assets, nor are any key views or the setting of heritage features likely to be affected by development in this location. As such, neutral effects would be predicted in relation to growth in this location.

For both of these options, whilst there are several plan policies that would continue to support the protection and enhancement of heritage, the baseline position is unlikely to change given that there are no additional sites allocated that would have negative or positive effects with regards to heritage. Therefore, **neutral effects** are predicted.

### Option 4: Increased dispersal in the urban areas

With increased dispersal and a higher scale of growth it is more likely that additional greenfield sites would be required within and on the periphery of the urban area (as well as the brownfield sites being promoted). This could lead to some negative effects with regards to the loss of greenfield land and use of natural resources in construction.

This would be offset by the fact that brownfield land sites would still be promoted in the urban areas and the plan policies would promote efficient use of natural resources in new developments. Therefore, overall **neutral effects** are predicted.

### Option 5: Dispersal plus strategic focus

Dispersal on sites in the urban area would have some positive effects as discussed for Option 1. However, the addition of strategic locations for growth whether this be at Galley Common or North of Nuneaton would lead to an increase in the overall amount of greenfield land and natural resources required to support growth. As such, **minor negative effects** are predicted for both options.

## Appraisal summary table (Cultural heritage)

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Min +ve	Min -ve
2) Existing strategy rolled forward	660 dpa	Neutral	
3a) Strategic focus (Galley Common)	680 dpa	Neutral	
3b) Strategic focus (North of Nuneaton)	680 dpa	Neutral	
4) Increased dispersal in the urban areas	710 dpa	Min +ve	Min -ve
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Min +ve	Min -ve
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Min +ve	Min -ve

<b>SA Topic 11</b>	<b>Landscape</b>
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### Option 1: Urban dispersal

The majority of additional sites are not constrained with regards to landscape character as they are generally within existing built up areas and /or in close proximity to larger scale growth that would be expected to come forward through the adopted local plan.

Site, EMP2, a large 18 ha site allocated mainly for employment with some residential use is at the urban fringe of the settlement comprising open fields intercepted by the M6 and A444 and large warehouse developments visible to the south west of site. Whilst development here would alter the semi-rural/ open character of the site the landscape is rendered somewhat less sensitive due to the major highway infrastructure and the adjacent warehouse development. The landscape has been assessed as having few attractive features/ views and as having moderate-high capacity to accommodate employment and residential use<sup>23</sup>. This site is already allocated in the adopted Plan for employment. Allowing some release for residential development is likely to have a less negative effect upon landscape character given that it would be less intrusive in terms of traffic and scale of buildings.

GAL 7 is somewhat sensitive to change, and therefore development could have some minor negative effects with regards to development.

Conversely, redeveloping sites such as ABB6,7,8 can potentially improve the urban landscape/ townscape as these locations includes some negative features such as unattractive buildings and land and a car dominated environment.

The de-allocation of strategic sites 'East of Bulkington' and the 'Woodlands' is also positive with regards to landscape as development here could lead to negative effects on the character of the urban fringes.

A range of existing plan policies that will be rolled forward from the adopted local plan will continue to have benefits with regards to landscape. This includes, NE1 and NE5 in particular. Further benefits are anticipated through amendments to policies such as SA1 (Development principles on strategic sites) which calls for development to incorporate landscape features into scheme design and retain/ enhance existing features such hedgerows, trees and ridge and furrow sites. This policy also requires the provision of appropriate trees and orchards, which is an addition to the adopted plan policies.

<sup>23</sup> Ibid: 5592.002

Policy BE3 (Sustainable design and construction) calls for development to contribute to local distinctiveness and character reflecting the positive attributes of surrounding areas and respecting sensitivity to change within urban character areas.

Overall, the effects on landscape are predicted to be positive. There would be lesser development on large scale strategic greenfield sites, and the new sites proposed are mostly of a low sensitivity to change. A focus on brownfield regeneration should also help to improve townscape character in Nuneaton. Though some site allocations in semi-rural locations would result in changes to the character of the landscape, these sites have been assessed as having moderate-high capacity to accommodate development (NBLCS). Furthermore, the regeneration of sites such as ABB6,7,8 is likely to create more attractive areas with enhanced landscape / townscape. Therefore, overall, **minor positive effects** on landscape are predicted.

### **Appraisal of reasonable alternatives**

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

#### Option 2: Continuation of existing strategy

Under this approach, **neutral effects** would be expected. No additional site options would be necessary, and the sites that are currently adopted would continue to be supported.

#### Option 3: Strategic location focus

Further strategic growth to the north of Nuneaton is likely to have negative effects upon landscape. There are parcels of land in this location that are very sensitive in terms of landscape character, but some areas that may be more accommodating to change. The potential for avoidance and mitigation could therefore mean that residual effects are **minor negatives**.

Strategic growth at Galley Common would likely have negative effects upon areas of countryside that are highly sensitive with regards to landscape character. Several plan policies would help to mitigate effects through plan design, green infrastructure and so on, but there would still be residual negative effects due to the scale of change involved. Positive effects in terms of regeneration would also be limited under this approach as dispersal in the urban area would be reduced. Though landscape character in other parts of the Borough would be better protected (i.e. the Woodlands and East of Bulkington) these are less sensitive than comparative growth in Galley Common. Therefore, overall residual **moderate negative effects** are predicted.

#### Option 4: Increased dispersal in the urban areas

At an increased scale of growth, there is a range of additional sites within the existing urban areas that could be allocated (compared to option 1). Several of these are not particularly sensitive in terms of landscape and townscape and so their inclusion would not be anticipated to lead to significant effects despite an overall increase in development. However, there are some more sensitive locations that could give rise to minor negative effects. The effects are dependent on the sites involved, so a degree of uncertainty exists. However, potential **minor negative effects** are highlighted in this respect. Alongside these, there would still be regeneration on brownfield sites (as per the proposed approach), and thus **minor positive effects** are predicted as well.

### Option 5: Dispersal plus strategic focus

The positive effects associated with regeneration and reuse of land and buildings would still occur under this approach as there would be a degree of dispersal, presumably on brownfield sites in the first instance. To achieve a higher scale of growth though, strategic growth would be involved. As discussed under options 3a and 3b, this would lead to negative effects at both locations, with those at Galley Common being of moderate significance and to the north of Nuneaton minor negative significance. Alongside these, there would still be regeneration on brownfield sites (as per the proposed approach), and thus **minor positive effects** are predicted as well for option 5a and 5b.

### **Appraisal summary table (Landscape)**

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Minor +ve	
2) Existing strategy rolled forward	660 dpa	Neutral ?	
3a) Strategic focus (Galley Common)	680 dpa	Moderate -ve	
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor -ve	
4) Increased dispersal in the urban areas	710 dpa	Neutral ?	Minor +ve
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Moderate-ve	Minor +ve
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Minor -ve	Minor +ve

## Appendix B: Site Appraisal Methods

LPA SA Topics	AECOM Site Assessment Topics
Air	Air quality
Biodiversity	Biodiversity
Climatic factors	Climate change resilience Climate change mitigation
Cultural heritage	Historic environment
Economic factors	Economy and Infrastructure
Landscape	Landscape
Material assets	Waste
Population and human health	Health and wellbeing
Social factors	Housing Transportation (topic is cross thematic)
Soil	Land and soil
Water	Water quality

*Note- most sites over 30ha were assigned two 'access points' to determine road/path (driving/walking distances) to account for the potential for multiple site entrances. Where sites over 30a were not assigned two access points, it was due to access constraints. This also helps to ensure that larger sites are not unfairly given a poor score related to the location of access points. Some other sites were assigned two access points where it was deemed beneficial to the fair assessment of the site.*

SA Criteria and Objectives	Assessment		Data (national/local data)	Methodology	Notes
1. Biodiversity	1.1	Direct loss or disturbance of biodiversity assets	SSSI, SAC, SPA, Ramsar, NNR (none in area), Ancient woodland LWS, LNR	Euclidean distance to nearest /overlap with biodiversity asset.	Sites adjacent to or overlapping with SSSI, SAC, SPA, Ramsar, NNR= red Sites overlapping with LNR, LWS or ancient woodland=red All other scores on a relative scale Scores over 600m Overall scoring Scores red in at least one measure as worst scoring Scores in the relative scale in at least one measure as worst scoring All scores green
	1.2	Disruption or loss of TPO	TPO	Intersect	Red= overlap Green= no overlap
2. Air Quality	2.1	Distance to nearest AQMA	AQMA	Euclidean distance from site to nearest AQMA	Under 100m Between 100m and 1200m Over 1200m
1-	2.2	Number of AQMAs within 1200m (road network distance)	AQMA	Number of AQMAs within 1200m (road network distance)	Relative scoring for all sites
3. Water Quality	No safeguarding/protection zones in Nuneaton and Bedworth				
4. Soil and Land	4.1	Loss of high quality agricultural land	Agricultural Land Classification (pre-1988)	Site overlap (ha) with agricultural land classification	Add together Grades 1, 2 and 3- red= loss of over 25ha, Green=0 and the rest as relative.
	4.2		Agricultural Land Classification (post-1988)	Site overlap (ha) with agricultural land classification	Add together Grades 1, 2 and 3a- red= loss of over 25ha, grey= 0 or not survey, value in between are relative
	4.3	Efficient use of land (greenfield/brownfield)	Site-by-site data relating to existing land use	Site-by-site assessment of	Greenfield Brownfield Mixed



				current site land use	
	4.4	Loss of land safeguarded for mineral extraction	Mineral safeguarding areas	Intersect	Oha Relative for the rest
5. Landscape	5.1	Landscape Sensitivity	Landscape sensitivity study	Overlap with areas identified as potentially sensitive	Strong Moderate Weak NA
6. Historic Environment	6.1	Impact of historic environment and nearby heritage assets	Listed buildings, world heritage site, historic parks and gardens, scheduled monuments, registered battlefields conservation areas	Euclidean distance to nearest heritage asset Site-by-site assessment looking at potential impact on nearby heritage asset	A degree of subjective and qualitative desktop assessment will be required on all sites which are within 200m of any heritage asset, or sites which are large in size or nearby to a more sensitive heritage asset. No nearby heritage asset Nearby heritage asset but likely no effects Nearby/adjacent heritage asset and potential, but avoidable effects Nearby/adjacent heritage assets and anticipated effects.
7. Waste					
8. Climate Change resilience	8.1	Potential for site to flood (fluvial)	Environment Agency Flood Risk Data	Site overlap (%) with flood zone	0% Relative for the rest
9. Climate Change Mitigation					
10. Housing					
11. Health and Wellbeing	11.1	Distance to nearest GP	GP surgeries	Euclidean distance	Relative scoring
		Number of GPs within 800m (road distance)	GP surgeries	Road distance	Relative scoring
	11.2	Distance to nearest formal green/open space	Green and open space	Euclidean distance	Relative scoring
		Number of green/open spaces within 800m (road distance)	Green and open space	Road distance	Relative scoring

	11.3	Potential for site to provide onsite green/open space	Site options	Site size could result in adequate onsite provision, alongside a qualitative assessment about loss and potential to mitigate	Relative scoring
	11.4	Distance to sports/ recreation/ gym facilities	Sports/ recreation facilities Leisure centres	Euclidean distance	Relative scoring
		Number of sports/ recreation facilities within 800m (road distance)	Sports/ recreation facilities Leisure centres	Road distance	Relative scoring
	11.5	Amenity issues nearby (sources of noise, odour, nuisance and related land use etc)	Satellite imagery, Google Street View	Check for potential nearby amenity issues on a site-by-site basis	No nearby amenity issues identified Potential minor nearby amenity issues (mitigation possible) Nearby amenity issues Amenity issues likely to be an issue for the intended use of development
12. Economy and Infrastructure	12.1	Distance to major employment centres, or how many major employment centres/local shopping districts within 3km.	Major employment areas	Euclidean distance	Relative scoring
		Number of major employment centres within 800m (road distance)	Major employment areas	Road distance	Relative scoring
	12.2	Loss of employment land	Employment land	Intersect	Yes No
13. Transportation	13.1	Proximity to active travel network	Active travel network (cycle)	Euclidean distance	Relative scoring

		<i>network, OS Paths and PROW)</i>		
	<i>Length of active travel network within 800m (road distance)</i>	<i>Active travel network (cycle network, OS Paths and PROW)</i>	<i>Road distance</i>	<i>Relative scoring</i>
13.2	<i>Proximity to bus stop</i>	<i>Bus stop data</i>	<i>Euclidean distance</i>	<i>Relative scoring</i>
	<i>Number of bus stops within 800m (road distance)</i>	<i>Bus stop data</i>	<i>Road distance</i>	<i>Relative scoring</i>
13.3	<i>Proximity to railway station</i>	<i>Railway stations</i>	<i>Euclidean distance</i>	<i>Relative scoring</i>
	<i>Number of railway stations within 800m (road distance)</i>	<i>Railway stations</i>	<i>Road distance</i>	<i>Relative scoring</i>
13.4	<i>Proximity to strategic road network</i>	<i>Strategic Road network</i>	<i>Road distance to A road or motorway</i>	<i>Relative scoring</i>
13.5	<i>Distance to nearest built-up centre</i>	<i>Built-up centres</i>	<i>Euclidean distance</i>	<i>Relative scoring</i>
	<i>Number of built-up centres within 800m (road distance)</i>	<i>Built-up centres</i>	<i>Road distance</i>	<i>Relative scoring</i>
13.6	<i>Distance to nearest primary school</i>	<i>Primary schools</i>	<i>Euclidean distance</i>	<i>Relative scoring</i>
	<i>Number of primary schools within 800m (road distance)</i>	<i>Primary schools</i>	<i>Road distance</i>	<i>Relative scoring</i>

# Appendix C: Site Appraisal Matrix

See separate Microsoft Excel Spreadsheet

[aecom.com](http://aecom.com)

Borough Plan Committee - 12<sup>th</sup> July 2023

## **Appendix F**

### **Borough Plan Review**

### **Draft Habitat Regulations Assessment**

# Habitats Regulations Assessment of the Nuneaton and Bedworth Local Plan Review

Nuneaton and Bedworth Borough Council

60673395

June 2023

### Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
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### Revision History

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# 1. Introduction

## Scope of Project

- 1.1 Under the Conservation of Habitats and Species Regulations 2017 (as amended), an Appropriate Assessment is required, where a plan or project is likely to have a significant effect upon a European Site, either individually or 'in combination' with other projects.
- 1.2 AECOM was appointed by Nuneaton and Bedworth Borough Council to undertake a Habitats Regulations Assessment of its Borough Plan Review 2024-2039. The objective of this assessment was to identify any aspects of the Borough Plan Review that would cause an adverse effect on the integrity of European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), candidate Special Areas of Conservation (cSACs), potential Special Protection Areas (pSPAs) and, as a matter of Government policy, Ramsar sites), either alone or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.

## Legislation

- 1.3 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). This established a transition period, which ended on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law, meaning that legislation relating to nature conservation continues to apply to and in the UK post-Brexit.
- 1.4 The need for Appropriate Assessment (Figure 1) is set out by the Conservation of Habitats and Species Regulations 2017 (as amended) and is retained in the EU Exit Regulations 2019. The Regulations apply the precautionary principle<sup>1</sup> to assessments of European Sites, which form part of the newly coined National Site Network. Consent should only be granted for plans and projects once the relevant competent authority has ascertained that there will either be no likelihood of significant effects, or that a mechanism is in place to ensure that no adverse effect on the integrity of the European Site(s) in question arises. Where an Appropriate Assessment has been carried out and results in a negative assessment, or if uncertainty remains over the significant effect, consent can only be granted if there are no alternative solutions and there are Imperative Reasons of Over-Riding Public Interest (IROPI) for the development and compensatory measures have been secured.
- 1.5 To ascertain whether site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question.

---

<sup>1</sup> The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: "*When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis*".

1.6 Figure 1 provides the legislative basis for an Appropriate Assessment.

**Conservation of Habitats and Species Regulations 2017 (as amended)**

The Regulations state that:

*“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... must make an appropriate assessment of the implications for the plan or project in view of that site’s conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.”*

**Figure 1. The legislative basis for the HRA process.**

1.7 Over the years, the term ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of “Appropriate Assessment”. Throughout this report, the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

## 2. Methodology

### Introduction

- 2.1 This section sets out the methodology for undertaking the HRA. HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore, there is no direct relationship to the ‘Test of Soundness’.
- 2.2 The HRA is being carried out in the absence of formal Government guidance. The Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities (DLUHC)) released a consultation paper on Appropriate Assessment (AA) of Plans in 2006<sup>2</sup>. As yet, no further formal guidance has emerged although Government published general guidance on appropriate assessment in 2019<sup>3</sup>. However, Court Judgements can be used to shape the approaches used.
- 2.3 The draft DLUHC guidance<sup>4</sup> makes it clear that when implementing HRA of land-use plans, the AA should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself: “*The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.*” More recently, the Court of Appeal<sup>5</sup> ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be ‘achieved in practice’ to avoid an adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy)<sup>6</sup>. In this case the High Court ruled that for ‘*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg. 61 of the Habitats Regulations*’.
- 2.4 In other words, there is a tacit acceptance that HRA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers.
- 2.5 Figure 2 below outlines the stages of HRA according to current draft DLUHC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the plan until no significant adverse effects remain.

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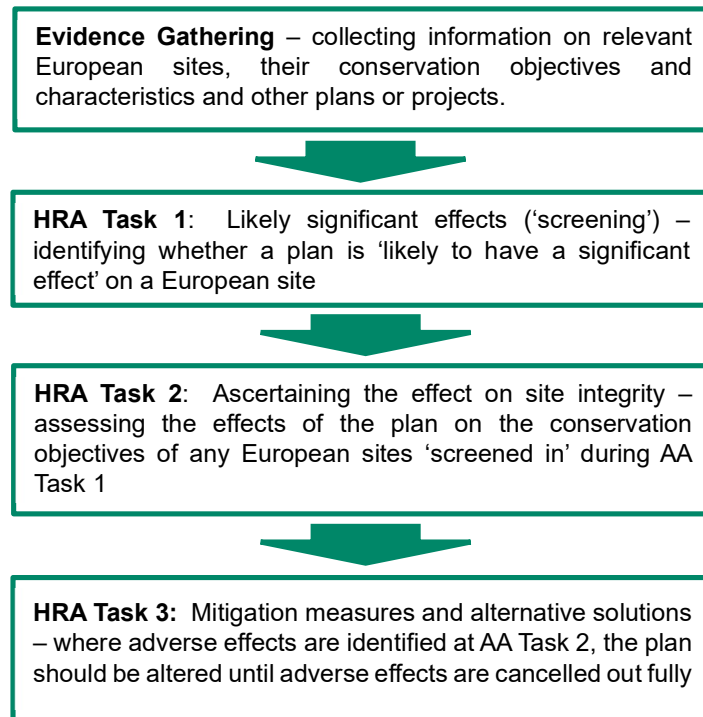
<sup>2</sup> DLUHC (was CLG) (2006) Planning for the Protection of European Sites, Consultation Paper

<sup>3</sup> <https://www.gov.uk/guidance/appropriate-assessment>

<sup>4</sup> Ibid

<sup>5</sup> No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17<sup>th</sup> February 2015

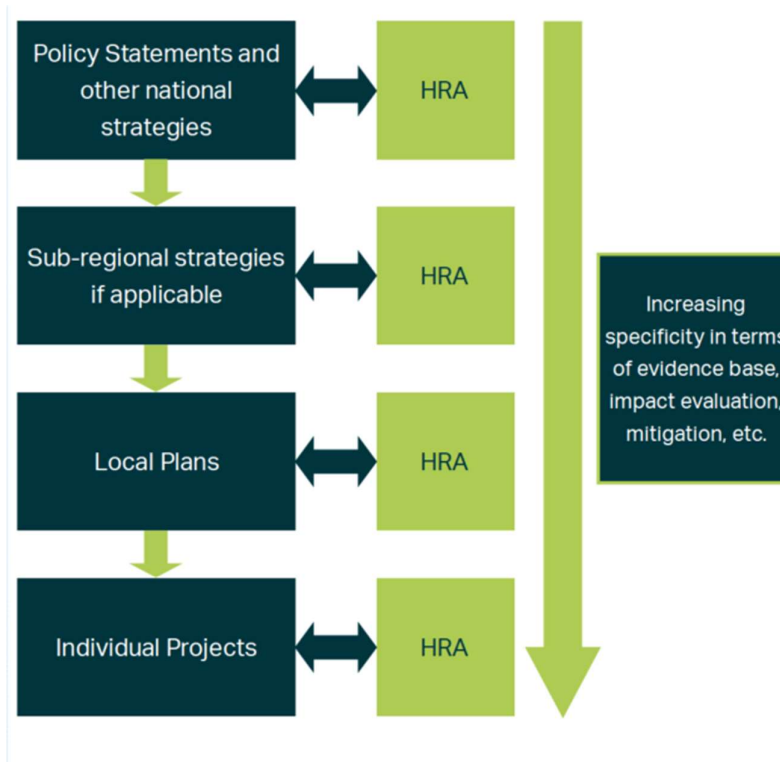
<sup>6</sup> High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015



**Figure 2. Four-Stage Approach to Habitats Regulations Assessment (Source: DLUHC, 2006).**

## HRA Task 1 – Likely Significant Effects (LSE)

- 2.6 The first stage of any Habitats Regulations Assessment (HRA Task 1) is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
- 2.7 *“Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”*
- 2.8 The objective is to ‘screen out’ those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites.
- 2.9 The level of detail in land use plans concerning developments that will be permitted under the plans is rarely sufficient to allow the fullest quantification of potential adverse effects. It is therefore necessary to be cognisant of the fact that HRAs for plans can be tiered, with assessments being undertaken with increasing specificity at lower tiers. This is in line with DLUHC guidance and court rulings that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be ‘appropriate’ to the level of plan or project that it addresses. This ‘tiering’ of assessment is summarised in Figure 3.



**Figure 3. Tiers in HRA of land use plans.**

2.10 On these occasions the advice of Advocate-General Kokott<sup>7</sup> to the European Court of Justice is worth considering. She commented that: *“It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure”* [emphasis added].

## HRA Task 2 – Appropriate Assessment

2.11 Where it is determined that a conclusion of ‘no likely significant effect’ cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that ‘appropriate assessment’ is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment.

2.12 By virtue of the fact that it follows Screening, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment would take any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the

<sup>7</sup> Opinion of Advocate-General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49.  
<http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>



potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

- 2.13 A 2018 decision by the European Court of Justice<sup>8</sup> (ECJ), which appears to conclude that measures intended to avoid or reduce the harmful effects of a proposed project on a European site, but which are not an integral part of the project or plan, may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. The implications of the ECJ ruling are structural, essentially meaning that the role of avoidance and measures should be discussed in the subsequent 'appropriate assessment' stage instead, with a more in-depth, reasoned scientific basis.
- 2.14 A more recent 2018 case<sup>9</sup> also confirmed that an appropriate assessment must consider the interest features of European sites even where those features may be found outside the strict boundaries of those sites and must also consider other habitat types or species, which are present on the site, but for which that site has not been listed but which are necessary to the conservation of the habitat types and species listed for the protected area.

## HRA Task 3 – Avoidance and Mitigation

- 2.15 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.16 In evaluating significance, AECOM has relied on professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.
- 2.17 When discussing 'mitigation' for the proposed development sites, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the detail of the mitigation measures themselves since the Local Plan document is a high-level policy document.

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<sup>8</sup> People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

<sup>9</sup> Holohan et al vs. An Bord Pleanála (C-461/17)

### 3. Internationally Designated Sites Within and Around the Nuneaton and Bedworth Borough

3.1 There are two internationally designated site within the immediate potential zone of influence of the DPD. These are:

- Ensor’s Pool SAC
- River Mease SAC

**Table 1. Physical Scope of the HRA.**

European Site	Location
Ensor’s Pool SAC	Located within the Borough of Nuneaton and Bedworth, adjacent to the south-western extent of the town of Nuneaton
River Mease SAC	Located 15.4km north of the Borough within North-West Leicestershire District

3.2 In 2015, a Shadow Habitats Regulations Assessment of the Local Plan was undertaken by Mott MacDonald. This assessment screened out any potential linking impact pathways between the River Mease SAC and the Local Plan due to a lack of hydrological connectivity between the Borough and the SAC (Nuneaton and Bedworth Borough does not lie within the catchment of the River Mease). As such the River Mease SAC is not discussed further within this document.

3.3 In their response to the consultation on the Local Plan Review and its HRA, Natural England observed that the Plan area is located upstream of the Severn Estuary Special Area of Conservation (SAC) and Ramsar Site (approximately 96km to the south-west) and is hydrologically linked to the designated sites through the River Sowe tributary of the Warwickshire River Avon. The Plan area is also located upstream of the Humber SAC/Ramsar site (125km to the north-east) and is hydrologically linked to the designated site through the River Anker which flows into the River Trent tributary of the River Humber.

3.4 The Severn Estuary migratory fish species (Atlantic salmon, Sea trout, Allis Shad, Twaite Shad, Sea lamprey, River lamprey, European eel) travel upstream through the River Severn and its tributaries, spending part of their life cycle in the wider Severn hydrological catchment. Currently the tidal weir at Tewkesbury is believed to present an obstacle to most of the migratory fish species, with the exception of the European eel, which has been recorded within the Warwickshire Avon. The Humber Estuary migratory fish species are the Sea lamprey and River lamprey. The River lamprey has been recorded as far upstream as the R. Dove (Staffordshire/Derbyshire). There is therefore the possibility of these species being present during the Plan period within the River Anker and River Sowe (and possibly tributaries) which would render these rivers functionally-linked habitat for the Humber Estuary SAC/Ramsar site and Severn Estuary SAC/Ramsar site.

# Ecological Context and Interest Features of Designated Sites

## Ensor's Pool SAC

### Introduction

- 3.5 Ensor's Pool was notified as an SAC in 2001 when it supported a large and healthy population of white-clawed crayfish, *Austropotamobius pallipes* (approximately 50,000 individuals), and it is the population of this species that is the interest feature of the site.
- 3.6 Ensor's Pool is located immediately south-west of Nuneaton between Heath End Road to the north and Harefield Lane to the south. It is an abandoned clay pit measuring 3.5 hectares in size with a perimeter of approximately 770 metres and an average depth of 8 metres. A dye tracing exercise of the pool by the Environment Agency has confirmed Ensor's Pool is groundwater fed and is not hydraulically linked to nearby ordinary watercourses.
- 3.7 The pool has some marginal vegetation of hard rush *Juncus inflexus*, common spike-rush *Eleocharis palustris*, water horsetail *Equisetum fluviatile* and lesser bulrush *Typha angustifolia*. Water plants include spiked water-milfoil spicatum and broad leaved pondweed *Potamogeton natans*. The pool is surrounded by areas of scrub and grassland.

### Qualifying Features<sup>10</sup>

- 3.8 Annex II species:
- White-clawed (or Atlantic stream) crayfish *Austropotamobius pallipes*.

### Conservation Objectives<sup>11</sup>

- 3.9 "With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 3.10 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats of qualifying species
  - The structure and function of qualifying species
  - The structure and function of the habitats of qualifying species
  - The supporting processes on which the habitats of qualifying species rely
  - The populations of qualifying species, and,

<sup>10</sup> Available at: <http://publications.naturalengland.org.uk/file/5414346679123968> [accessed 15/12/2021]

<sup>11</sup> Available at: <http://publications.naturalengland.org.uk/file/5267179054563328> [accessed 15/12/2021]

- *The distribution of qualifying species within the site.*”

3.11 For Ensor’s Pool SAC the ‘restore’ element of the objective is crucial as a series of surveys have indicated that the white-clawed crayfish population of the site died out at least seven years ago. The surveyor’s report, published by Natural England in October 2015 states that the *‘once abundant population of white-clawed crayfish appears to have disappeared. The pool still appears to provide suitable habitat for crayfish and there is no indication that any other animal or plant species has been affected.’* The report goes on to suggest that crayfish plague seems likely to be the cause of mortality. Further surveys in 2015 confirmed that the population of white-clawed crayfish is no longer present at Ensor’s Pool. However, the fact that white-clawed crayfish are not currently present in the SAC does not mean that the site is no longer protected. Instead conservation efforts are focussed on restoring the white-clawed crayfish population and the Local Plan must ensure it does not compromise those efforts.

## Threats / Pressures to Site Integrity

3.12 The following threats/ pressures to the site integrity of Ensor’s Pool SAC are listed in Natural England’s Site Improvement Plan<sup>12</sup> with further details provided within the Supplementary Advice on Conserving and Restoring Site Features<sup>13</sup>:

- Changes in species distribution
  - This former marl pit has held a very large population estimated at 50,000 individuals. The results of a 2015 survey show that the once abundant population of white-clawed crayfish has now disappeared from the SAC. The pool still provides a suitable habitat for crayfish with abundant emergent and submerged vegetation, under-cut banks providing potential refuges and shelter from predator and there appears to be good crayfish habitat around all of the pool.

3.13 Consultation with Natural England for the adopted Borough Local Plan<sup>14</sup> also identified additional potential linking impact pathways:

- Recreational pressure: *“the risk of recreational activities arising from an increase in population stemming from net new dwellings, adversely affecting the designated native crayfish population and their habitat”*; and
- Changes to ground water flows.

## Humber Estuary SAC and Ramsar site

### Introduction

3.14 The Humber is the second-largest coastal plain estuary in the UK, and the largest coastal plain estuary on the east coast of Britain. It is a muddy, macro-tidal estuary, fed by the Rivers Ouse, Trent and Hull, Ancholme and Graveney. Suspended sediment concentrations are high, and are derived from a variety of sources, including marine sediments and eroding boulder clay along the Holderness coast. This is the northernmost of the English east coast estuaries

<sup>12</sup> Available at: <http://publications.naturalengland.org.uk/publication/5364843502632960> [accessed 15/12/2021]

<sup>13</sup> Available at: <http://publications.naturalengland.org.uk/file/4949612890947584> [accessed 15/12/2021]

<sup>14</sup> Natural England letter dated 22 February 2016. Reference 169179

whose structure and function is intimately linked with soft eroding shorelines. Habitats within the Humber Estuary include 1330 Atlantic salt meadows and a range of sand dune types in the outer estuary, together with subtidal sandbanks (H1110 Sandbanks which are slightly covered by sea water all the time), extensive intertidal mudflats (H1140 Mudflats and sandflats not covered by seawater at low tide), glasswort beds (H1310 *Salicornia* and other annuals colonising mud and sand), and 1150 coastal lagoons.

- 3.15 As salinity declines upstream, reedbeds and brackish saltmarsh communities fringe the estuary. These are best-represented at the confluence of the Rivers Ouse and Trent at Blacktoft Sands. Upstream from the Humber Bridge, the navigation channel undergoes major shifts from north to south banks, for reasons that have yet to be fully explained. This section of the estuary is also noteworthy for extensive mud and sand bars, which in places form semi-permanent islands. Significant fish species include river lamprey *Lampetra fluviatilis* and sea lamprey *Petromyzon marinus* which breed in the River Derwent, a tributary of the River Ouse.

### Qualifying features

- 3.16 The SAC and Ramsar site have numerous qualifying features but as per Natural England advice the features of relevance to this assessment are:

- 1095 Sea lamprey *Petromyzon marinus*; and
- 1099 River lamprey *Lampetra fluviatilis*

- 3.17 These are both anadromous species (spending part of their life cycle in the sea and part upstream in freshwater) and, provided there are no significant blockages, can migrate a considerable distance upstream from the SAC boundary in order to breed and spawn.

### Conservation objectives

- 3.18 *'Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species*
- *The structure and function (including typical species) of qualifying natural habitats*
- *The structure and function of the habitats of qualifying species*
- *The supporting processes on which qualifying natural habitats and habitats of qualifying species rely*
- *The populations of qualifying species, and,*
- *The distribution of qualifying species within the site'.*

## Threats/pressures to site integrity

3.19 The following threats/ pressures to the site integrity of the Humber Estuary SAC are listed in Natural England's Site Improvement Plan<sup>15</sup> with further details provided within the Supplementary Advice on Conserving and Restoring Site Features<sup>16</sup>:

- Water pollution
- Coastal squeeze
- Undergrazing
- Invasive species
- Public access/disturbance
- Fisheries management
- Direct landtake
- Air pollution
- Shooting/scaring
- Inappropriate scrub control

3.20 For the purposes of this HRA the key threat is blockage to migratory fish passage throughout the catchment of the watercourses that feed the River Humber (and thus the SAC) either through physical blockage, changes to water levels or changes to water chemistry.

3.21 The Supplementary Advice on the Conservation Objectives has a specific attribute 'Structure and function: biological connectivity' for both migratory fish species, with the associated target '*Restore connectivity of estuarine features to surrounding rivers, freshwater, marine and coastal habitats, to ensure larval dispersal and recruitment, maintain nursery grounds for mobile species, and to allow movement of migratory fish*'. The fact that the target is to restore connectivity (rather than simply preserving existing connectivity) is relevant to the assessment as it means consideration must be given to anything which would interfere with endeavours to restore connectivity.

## Severn Estuary SAC and Ramsar site

### Introduction

3.22 The Severn Estuary lies on the south-west coast of Britain at the mouth of four major rivers (the Severn, Wye, Usk, and Avon). The immense tidal range (the second highest in the world) and classic funnel shape make the Severn Estuary unique in Britain and very rare worldwide. This tidal range creates strong tidal streams and high turbidity, producing communities characteristic of the extreme physical conditions of liquid mud and tide-swept sand and rocks. The Estuary includes a wide diversity of habitats including Sandbanks which are slightly covered by sea water all the time, Mudflats and sandflats not covered by sea

<sup>15</sup> <http://publications.naturalengland.org.uk/publication/5427891407945728>

<sup>16</sup> <https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK0030170&SiteName=humber%20estuary&SiteNameDisplay=Humber+Estuary+SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=8>

water at low tide, Atlantic salt meadows, and Reefs, which are identified as Annex I habitat types in their own right.

3.23 The estuarine fauna includes: invertebrate populations of importance (especially as a food resource for a wide range of bird and fish species), internationally important populations of waterfowl; and large populations of migratory fish, including sea lamprey *Petromyzon marinus*, river lamprey *Lampetra fluviatilis* (both of which spawn in freshwater but complete part of their life cycle in the sea), and twaite shad *Alosa fallax*.

## Qualifying features

3.24 The SAC and Ramsar site have numerous qualifying features but as per Natural England advice the features of relevance to this assessment are:

- 1095 Sea lamprey *Petromyzon marinus*;
- 1099 River lamprey *Lampetra fluviatilis*; and
- S1103 Twaite shad *Alosa fallax*

3.25 These are all anadromous species (spending part of their life cycle in the sea and part upstream in freshwater) and, provided there are no significant blockages, can migrate a considerable distance upstream from the SAC boundary in order to breed and spawn.

## Conservation objectives

3.26 *'Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species*
- *The structure and function (including typical species) of qualifying natural habitats*
- *The structure and function of the habitats of qualifying species*
- *The supporting processes on which qualifying natural habitats and habitats of qualifying species rely*
- *The populations of qualifying species, and,*
- *The distribution of qualifying species within the site'.*

## Threats/pressures to site integrity

3.27 The following threats/ pressures to the site integrity of the Severn Estuary SAC are listed in Natural England's Site Improvement Plan<sup>17</sup> with further details provided within the Supplementary Advice on Conserving and Restoring Site Features:

- Public access/disturbance
- Physical modification

<sup>17</sup> <http://publications.naturalengland.org.uk/publication/4590676519944192>

- Impacts of development
- Coastal squeeze
- Changes in land management
- Changes in species distributions
- Water pollution
- Air pollution
- Recreational and commercial fishing
- Invasive species
- Marine litter
- Marine pollution

3.28 For the purposes of this HRA the key threat is blockage to migratory fish passage throughout the catchment of the watercourses that feed the River Severn (and thus the SAC) either through physical blockage, changes to water levels or changes to water chemistry.

3.29 The Supplementary Advice on the Conservation Objectives has a specific attribute 'Structure and function: biological connectivity' for both migratory fish species, with the associated target '*Restore connectivity of estuarine features to surrounding rivers, freshwater, marine and coastal habitats, to ensure larval dispersal and recruitment, maintain nursery grounds for mobile species, and to allow movement of migratory fish*'. The fact that the target is to restore connectivity (rather than simply preserving existing connectivity) is relevant to the assessment as it means consideration must be given to anything which would interfere with endeavours to restore connectivity.



## 4. Likely Significant Effects

- 4.1 Based upon Natural England's Site Improvement Plans, Supplementary Advice on Conserving and Restoring Site Features and Natural England consultation with regards to the Local Plan, there are two impact pathways that require consideration with regards to Ensor's Pool SAC and the DPD.
- 4.2 The following potential linking impact pathways have been identified that could link Ensor's Pool SAC to the DPD. These are:
- Direct effects on white-clawed crayfish abundance and distribution;
  - Indirect effects through changes in groundwater input to the SAC, or water quality in the SAC; and
  - Indirect effects through recreational pressure. For example, recreational angling can introduce crayfish plague to sites if correct guidance is not followed.
- 4.3 Linking impact pathways to the Humber Estuary SAC/Ramsar and Severn Estuary SAC/Ramsar consist of anything that would block passage of migratory fish up and downstream or interfere with conservation measures to improve fish passage. This includes not only physical blockages in the river (weirs or other obstructions) but reductions in flow volume/rate or water quality.
- 4.4 The consideration of the Nuneaton and Bedworth Borough Plan Review and its potential effects on Ensor's Pool SAC, Humber Estuary SAC/Ramsar or Severn Estuary SPA/Ramsar is documented in Table 2.
- 4.5 Of greatest relevance to Ensor's Pool is Strategic Allocation SHA-2 (Arbury) as this large site lies immediately adjacent to the SAC. Given the proximity of this site in particular, likely significant effects (i.e. the mere potential for an effect) on the SAC cannot be dismissed. With regard to the Severn Estuary SAC/Ramsar and Humber Estuary SPA/Ramsar, part of site SHA3 (Judkins) in Nuneaton lies adjacent to the River Anker and is therefore indirectly connected to the Humber Estuary. Non-Strategic Allocations NSHA-5, NSHA-9, NSHA-14 and NSHA-17 also lie close to the River Anker in Nuneaton town centre. Non-Strategic Housing Allocation NSHA-2 and strategic allocation SEA6 (Bowling Green Lane) are both close to the River Sowe, although none are adjacent. These therefore are indirectly connected to the Severn Estuary SAC/Ramsar site.
- 4.6 The second stage of HRA known as Appropriate Assessment is therefore required.
- 4.7 The Conservation of Habitats and Species Regulations (2017 as amended) require that plans are not considered purely in isolation but 'in combination' with other projects and plans. Those most relevant in relation to the Nuneaton and Bedworth Borough Council's Borough Plan Review include:
- Hinckley and Bosworth Borough Council Local Plan (2006 to 2026)
  - Rugby Borough Council Local Plan 2011 - 2031
  - Coventry City Council I Local Plan 2011 - 2031
  - North Warwickshire Borough Council 2021

- Warwick District Local Plan 2011 - 2029

- 4.8 In addition to other plans and projects relevant to the immediate area around Nuneaton & Bedworth, consideration of habitat connectivity for the Severn Estuary and Humber Estuary SACs and Ramsar sites (see below) involves watercourses connecting to the Severn and Humber that cover a very large geographic area. The areas are too large for specific Local Plans to be listed here but any interference with riverine habitat connectivity in Nuneaton & Bedworth would operate in combination with any similar issues arising throughout the upstream catchments of both European sites.
- 4.9 The potential for policies and allocations to have likely significant effects in combination as well as in isolation has been taken into account in the screening table overleaf. For example, given the distance of Nuneaton & Bedworth from the Severn Estuary and Humber Estuary no specific allocation would be likely to significantly affect either SAC/Ramsar site except when considered alongside all other similar allocations in proximity to tributaries of those European sites. Similarly, only one allocation (SHA-2) has the potential to significantly affect Ensor's Pool alone; all the other identified allocations only have the potential to do so in combination.

**Table 2 Likely Significant Effects Test**

Policy	Summary	Likely Significant Effects Test (LSE)
DS1 – Presumption in Favour of Sustainable Development	When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF) and UN Sustainable goals	<p><b>No Likely Significant Effect</b></p> <p>By definition sustainable development must mean development that will not adversely affect European sites.</p>
DS2 – Settlement Hierarchy and Roles	Sets out the settlement hierarchy for the Borough. States that most development will be directed to Nuneaton as the primary town. Other development will be directed to, or adjacent to, other settlements, at a scale that reflects the role and function of the settlement and its order in the hierarchy, as well as the settlement's ability to accommodate change.	<p><b>No Likely Significant Effect</b></p> <p>Defining a settlement hierarchy poses no risk to European sites.</p>
DS3 – Development Principles	Sets out the overall principles governing development such as prioritising new development on previously developed land and requiring all new development to be sustainable, contributing to the national need to achieve net zero carbon emissions (including tree and orchard planting).	<p><b>No Likely Significant Effect</b></p> <p>Setting out broad development principles will not affect European sites</p>
DS4 – Strategic Overall Development Needs	Sets out the overall quantum of housing and employment development to be delivered in the Borough, as well as the allocation of cemetery space and gypsy and traveller pitches (the latter already subject to a separate HRA).	<p><b>Likely Significant Effects</b></p> <p>The location and amount of development are fundamental to the potential for effects on European sites and numerous allocated sites lie within 3km of Ensor's Pool SAC with one large site immediately adjacent to it.</p>
DS5 – Residential Allocations	Sets out the allocated sites for residential development and the quantum of housing expected on each.	<p><b>Likely Significant Effects</b></p> <p>The location and amount of development are fundamental to the potential for effects on European sites and numerous allocated sites lie within 3km of Ensor's Pool SAC with one large site immediately adjacent to it. Similarly, non-strategic housing allocations NSHA-5, NSHA-9, NSHA-14, and NSHA-17 lie adjacent to the River Anker and are therefore adjacent to potential functionally linked habitat for the Humber Estuary SAC and Ramsar site. Non-strategic housing allocation NSHA-2 lies close to the River Sowe and is therefore close to functionally-linked habitat for the Severn Estuary SAC and Ramsar site.</p>

Policy	Summary	Likely Significant Effects Test (LSE)
DS6 – Employment Allocations	Sets out the allocated sites for employment development and the quantum of floorspace expected on each.	<b>Likely Significant Effects</b>  The location and amount of development are fundamental to the potential for effects on European sites and numerous allocated employment sites lie within 3km of Ensor’s Pool SAC.
DS7 – Green Belt	Sets out the protection and treatment of Green Belt land in the Borough	<b>No Likely Significant Effect</b>  The status of Green Belt is not related to the potential for impacts on European sites
DS8 – Monitoring of Housing Delivery	Sets out the Council approach to monitoring housing delivery and what would be done to address any shortfall	<b>No Likely Significant Effect</b>  Monitoring of housing delivery will not affect European sites
DS9 - Review	Sets out the circumstances under which Plan review will occur	<b>No Likely Significant Effect</b>  No mechanism to affect European sites
SA1 – Development Principles on Strategic Sites	Sets out the broad requirements that must be met by all strategic development sites allocated in the Borough Plan Review	<b>No Likely Significant Effect</b>  Setting out general development principles will not affect European sites
SHA1 – Top Farm	Among other requirements this policy sets out the necessity for provision of at least 1,700 dwellings in a mix of dwelling types and sizes, potential on-site GP surgery or financial contribution to new GP practice to serve the north Nuneaton area, provision of a district centre including community facilities and provision of 2 form entry primary school (approximately 210 pupils)	<b>No Likely Significant Effect</b>  Although allocating housing development this allocation is more than 3km from Ensor’s Pool SAC and therefore beyond the groundwater catchment of the site as advised by the Environment Agency.
SHA2 – Arbury	Among other requirements this policy sets out the necessity for provision of at least 1,525 dwellings in a mix of dwelling types and sizes, financial contribution to local NHS Clinical Commissioning Group, provision of a local centre, including community facilities and provision of a Community Park.	<b>Likely Significant Effects</b>  This allocation lies adjacent to Ensor’s Pool SAC.

Policy	Summary	Likely Significant Effects Test (LSE)
SHA3 – Judkins	Among other requirements this policy sets out the necessity for provision of at least 400 dwellings in a mix of dwelling types and sizes.	<b>No Likely Significant Effect</b>  Allocation is within the 3km groundwater catchment of the site as advised by the Environment Agency for Ensor’s Pool SAC. It also lies adjacent to the River Anker and is therefore adjacent to potential functionally linked habitat for the Humber Estuary SAC and Ramsar site
SHA4 – Hospital Lane	Among other requirements this policy sets out the necessity for provision of at least 398 dwellings in a mix of dwelling types and sizes and potential on-site GP surgery or financial contribution to new GP or expanded surgery.	<b>No Likely Significant Effect</b>  Although allocating housing development, this allocation is more than 3km from Ensor’s Pool SAC and therefore beyond the groundwater catchment of the site as advised by the Environment Agency.
SHA5 – West of Bulkington	Among other requirements this policy sets out the necessity for provision of at least 348 dwellings in a mix of dwelling types and sizes	<b>No Likely Significant Effect</b>  Although allocating housing development this allocation is more than 3km from Ensor’s Pool SAC and therefore beyond the groundwater catchment of the site as advised by the Environment Agency.
SHA6 – Land at Former Hawkesbury Golf Course	Among other requirements this policy sets out the necessity for provision of 176 dwellings in a mix of dwelling types and sizes, and provision of a community building.	<b>No Likely Significant Effect</b>  Although allocating housing development this allocation is more than 3km from Ensor’s Pool SAC and therefore beyond the groundwater catchment of the site as advised by the Environment Agency.
SEA1 - Faultlands	Among other requirements this policy sets out that strategic employment site SEA-1 will be developed for employment uses comprising use classes E(g) (prior to 1 Sept 2020 use class B1), B2 and B8 and will involve the provision of approximately 26 ha of employment land	<b>No Likely Significant Effect</b>  Allocation is within the 3km groundwater catchment of the site as advised by the Environment Agency for Ensor’s Pool SAC.
SEA2 – Wilson’s Lane	Among other requirements this policy sets out that strategic employment site SEA-2 will be developed for employment, comprising use classes E(g) (prior to 1 Sept 2020 use class B1), B2 and B8, as well as residential uses and will involve the	<b>No Likely Significant Effect</b>

Policy	Summary	Likely Significant Effects Test (LSE)
	provision of approximately 18 ha of employment land and approximately 73 dwellings in a mix of dwelling types and sizes.	Although allocating employment, this allocation is more than 3km from Ensor's Pool SAC and therefore beyond the groundwater catchment of the site as advised by the Environment Agency.
SEA3 – Prologis Extension	Among other requirements this policy sets out the necessity for provision of approximately 5.3 ha of employment land for E(g) (prior to 1 Sept 2020 use class B1), B2 and B8 uses.	<b>No Likely Significant Effect</b>  Although allocating employment, this allocation is more than 3km from Ensor's Pool SAC and therefore beyond the groundwater catchment of the site as advised by the Environment Agency.
SEA4 – Coventry Road	Among other requirements this policy sets out that strategic employment site SEA-4 will be developed for employment uses comprising use classes E(g) (prior to 1 Sept 2020 use class B1, B2 and B8, and provision of approximately 9 ha of employment land.	<b>No Likely Significant Effect</b>  Allocation is within the 3km groundwater catchment of the site as advised by the Environment Agency for Ensor's Pool SAC.
SEA5 – Longford Road, Exhall	Among other requirements it states that strategic site SEA-5 will be developed for 2ha of employment uses.	<b>No Likely Significant Effect</b>  Although allocating employment, this allocation is more than 3km from Ensor's Pool SAC and therefore beyond the groundwater catchment of the site as advised by the Environment Agency.
SEA6 – Bowling Green Lane	Among other requirements this policy sets out that strategic employment site SEA-6 will be developed for employment uses comprising use classes E(g) (prior to 1 Sept 2020 use class B1), B2 and B8 and residential uses, including provision of approximately 19 ha of employment land and approximately 150 dwellings.	<b>No Likely Significant Effect</b>  Although allocating employment, this allocation is more than 3km from Ensor's Pool SAC and therefore beyond the groundwater catchment of the site as advised by the Environment Agency. However, it lies close to the River Sowe and is therefore adjacent to potential functionally linked habitat for the Severn Estuary SAC and Ramsar site
H1 – Range and Mix of Housing	Generally sets out the expected range of housing types and mix of housing required in the Borough	<b>No Likely Significant Effect</b>  Type of housing is not relevant to potential for effects on European sites.
H2 – Affordable Housing	Sets out the details regarding the extent of affordable housing provision required in the Borough	<b>No Likely Significant Effect</b>  Type of housing is not relevant to potential for effects on European sites.

Policy	Summary	Likely Significant Effects Test (LSE)
H3 – Gypsies and Travellers	Sets out the general requirements for gypsy and traveller provision, including reference to the Gypsy & Traveller DPD which has been subject to its own HRA.	<b>No Likely Significant Effect</b>  The HRA of the Gypsy & Traveller DPD concluded there would be no likely significant effect on Ensor’s Pool SAC from allocated sites and Natural England accepted that conclusion.
E1 – Nature of Employment Growth	Sets out the broad acceptability of different types of employment growth and among other requirements states that ‘Applications for economic uses, focusing particularly on use classes E(g(ii)) (prior to 1 Sept 2020 use class B1(b)), B2 and B8 on the strategic employment sites and the portfolio of existing employment sites will be approved subject to them satisfactorily meeting the policies in the plan.	<b>No Likely Significant Effect</b>  Particular employment allocations pose likely significant effects and these are considered separately. However, the broad policy requiring employment growth does not specify a quantum or location of development.
E2 – Existing Employment Estates	Among other requirements it states that the redevelopment, and/or expansion of existing employment sites listed in Table 11 (as shown on the policies map) for use class E(g)(ii) and B use classes employment purposes will be approved.	<b>No Likely Significant Effect</b>  This broad policy does not specify a quantum or location of development, other than that it would relate to existing employment estates. Moreover, since these are existing employment sites redevelopment of the sites to continue to provide employment is unlikely to pose impact pathways to the SAC.
TC1 – Town Centre Requirements	Among other requirements states that development within the town centres will need to support the aspirations of the Transforming Nuneaton and Transforming Bedworth initiatives.	<b>No Likely Significant Effect</b>  Setting requirements for town centre development without a specific mention to quantum of development will not affect European sites.
TC2 – Nature of Town Centre Growth	Among other requirements states that development within Nuneaton and Bedworth town centres will be expected to create a more accessible, well-connected and well-designed centre, with particular emphasis on linkages by walking, cycling and public transport.	<b>No Likely Significant Effect</b>  Setting requirements for town centre development without a specific mention to quantum of development will not affect European sites.
TC3 – Hierarchy of Centres	Among other requirements sets out the hierarchy that should be used to undertake any sequential assessments for town centre uses.	<b>No Likely Significant Effect</b>

Policy	Summary	Likely Significant Effects Test (LSE)
		Setting hierarchy for town centre uses will not affect European sites.
HS1 – Ensuring the Delivery of Infrastructure	General policy relating to infrastructure delivery. Among other requirements states that development will be required to provide infrastructure appropriate to the scale and context of the site in order to mitigate any impacts of the development, and address the needs associated with the development.	<b>No Likely Significant Effect</b>  A general policy regarding appropriate and timely delivery of infrastructure supporting development will not affect European sites.
HS2 – Strategic Accessibility and Sustainable Transport	Policy does not make any allocations but among other requirements states that transport proposals in line with those identified in the Coventry and Warwickshire Local Enterprise Partnership Strategic Economic Plan, Warwickshire County Council Local Transport Plan 2011 - 2026 (or subsequent updates) and Warwickshire County Council Cycle Network Development Plan/Local Cycling and Walking Infrastructure Plan (LCWIP) will be approved.	<b>No Likely Significant Effect</b>  Requiring accessibility and transport proposals to be in line with existing adopted plans and strategies will not affect European sites.
HS3 – Telecommunications and Broadband Connectivity	Among other requirements states that development must facilitate the provision of superfast broadband infrastructure including fibre to premises (in line with the latest Government target) in order to enable the delivery of broadband services across the borough.	<b>No Likely Significant Effect</b>  Provision of broadband connectivity will not affect European sites.
HS4 – Retaining Community Facilities	Sets out the limited circumstances in which development which would lead to the loss of community facilities will be permitted	<b>No Likely Significant Effect</b>  Setting out criteria for loss of community facilities will not affect European sites.
HS5 – Health	Requires all major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing.	<b>No Likely Significant Effect</b>  Requirements for health and wellbeing will not affect European sites.
HS6 – Sport and Exercise	Among other requirements, states that proposals which assist in creating a healthy environment across the borough using sports, leisure, and recreation facilities and/or opportunities to exercise will be approved.	<b>No Likely Significant Effect</b>  Requirements for health and wellbeing will not affect European sites.



Policy	Summary	Likely Significant Effects Test (LSE)
HS7 – Creating a Healthier Food Environment	Among other things, limits new hot food takeaways to town centres.	<b>No Likely Significant Effect</b>  Requirements for health and wellbeing will not affect European sites.
NE1 – Green & Blue Infrastructure	The borough’s green and blue infrastructure assets will be protected, managed, enhanced or created to provide nature recovery networks. New development proposals will enhance, sustain and restore existing and create green (including wildbelts) and blue infrastructure (including canals); whilst at the same time protecting and enhancing rights of way. The policy also specifically requires an undeveloped green buffer to Ensor’s Pool.	<b>No Likely Significant Effect</b>  A policy promoting a more connected approach to green infrastructure and buffering of important wildlife sites such as Ensor’s Pool and ancient woodland will not negatively affect European sites
NE2 – Open Space	Sets out a range of requirements by which new development will create an improved green network of publicly accessible and linked open spaces to support growth	<b>No Likely Significant Effect</b>  A policy promoting an improved green network will not negatively affect European sites
NE3 – Biodiversity and Geodiversity	Sets out requirements to protect and enhance both biodiversity and geodiversity. This includes the statement that <i>‘Development that would adversely affect Special Areas of Conservation or cause significant harm to Sites of Special Scientific Interest will not normally be granted planning permission’</i> .	<b>No Likely Significant Effect</b>  A policy protecting and enhancing biodiversity and geodiversity will not negatively affect European sites
NE4 – Managing Flood Risk and Water Quality	Among other requirements, identifies that new development should be prioritised to areas of lowest flood risk and must not increase flood risk elsewhere. This should consider the risk from all sources including fluvial, surface water and groundwater flood risk, making use of the Strategic Flood Risk Assessments (both Level 1 and Level 2) available public mapping such as the Flood Map for Planning and the Flood Risk from Surface Water map and historic flood information (which is available from the LLFA & other partners).	<b>No Likely Significant Effect</b>  A policy managing flood risk and protecting water quality will not negatively affect European sites
NE5 – Landscape Character	Among other requirements, states that major development proposals must demonstrate how they will conserve, enhance, restore or create a sense of place, as well as respond positively to the landscape setting in which the development proposal is located. Developers must take account of the Land Use	<b>No Likely Significant Effect</b>  A policy protecting landscape character will not negatively affect European sites

Policy	Summary	Likely Significant Effects Test (LSE)
	Designations Study and landscape guidelines when preparing their landscape strategy.	
BE1 – Contamination and Land Instability	Sets out the requirements that development proposals located on or adjacent to land which may have been subject to contamination and/or land instability will need to demonstrate.	<p><b>No Likely Significant Effect</b></p> <p>A policy setting out circumstances for development on contaminated land will not negatively affect European sites</p>
BE2 – Renewable and Low Carbon Energy	Among other requirements, notes that the council is committed to supporting low carbon developments. In addition, schemes providing renewable and low carbon technologies will be approved unless material considerations indicate otherwise. These include schemes that promote biomass energy, ground and air source heat pumps, solar thermal and solar photovoltaic.	<p><b>No Likely Significant Effect</b></p> <p>A policy on renewable energy will not negatively affect Ensor's Pool SAC given its qualifying interest features.</p>
BE3 – Sustainable Design and Construction	Sets out the Council's requirements for sustainable development	<p><b>No Likely Significant Effect</b></p> <p>Ensuring sustainable design and construction will not negatively affect European sites</p>
BE4 – Valuing and Conserving Our Historic Environment	Sets out the Council's requirements for conservating and enhancing historic assets	<p><b>No Likely Significant Effect</b></p> <p>Protecting the historic environment will not negatively affect European sites</p>

## 5. Appropriate Assessment

### Ensor's Pool SAC

- 5.1 Appropriate Assessment is not a technical term, it literally means whatever assessment is required to draw a conclusion regarding adverse effects on the integrity of the SAC. In other words, it considers whether the ability of the SAC to achieve its conservation objectives will be impaired by the Local Plan either alone or in combination with other plans and projects.

### Direct Effects on Abundance and Distribution

- 5.2 There is no mechanism for the delivery of housing and employment through the Local Plan to directly affect the abundance and distribution of white-clawed crayfish or interfere with attempts to reintroduce the species. Although SHA-2 (Arbury) is adjacent to the SAC, the associated policy requires a minimum 100m setback between the SAC boundary and any built development. This requirement was included in the adopted Borough Plan and was devised in agreement with Natural England. It ensures that there will be no direct interference with the SAC from the development (such as through encroachment or direct lighting, white-clawed crayfish are not sensitive to atmospheric noise) and also ensures the SAC is not isolated from the surrounding countryside.
- 5.3 There is therefore no potential for adverse effects on integrity. This is identical to the conclusion drawn in 2021 for the Gypsy & Traveller DPD HRA.

### Changes to Groundwater Flows

- 5.4 As previously noted, Ensor's Pool SAC is groundwater fed. As such, changes in hydrological conditions as a result of increased development could potentially impact of the groundwater flows depending on issues such as the depth of excavation and the nature of any subsurface construction. To inform the HRA of the Warwickshire Minerals Plan HRA in 2019 the Environment Agency's Groundwater Team highlighted that any minerals development within 2-3km of Ensor's Pool SAC could have a hydrogeological connection to Ensor's Pool, so would require further investigation on potential impacts to the SAC at the project level including water level changes.
- 5.5 Allocations SHA-2, SHA-3, NSHA-1, NSHA-3, NSHA-9, NSHA-13, NSHA-14, NSHA-15, NSHA-17 SEA-1, SEA-4 and CEM-1 all lie within 3km of the SAC. Most of these allocations are in the urban part of Nuneaton and are less likely to affect groundwater flows at the SAC than those on the fringes. Sites SHA-2 (particularly), NSHA-13, SEA-4 and SEA-1 are probably most likely to have a groundwater interaction with the SAC due to their size and/or location close to the SAC, although whether they will do so or not will depend on the details of construction proposed for the allocations which will not be defined until planning applications are being prepared.
- 5.6 Those projects that involve significant sub-surface works like minerals excavation will have a greater effect than those with few to no sub-surface works. Clearly conventional housing and employment development is much less likely to have a significant hydrogeological effects on a site up to 3km distant unless

- there were deep foundations below the water table, which for housing generally isn't the case. Any large structures with piling over a large area could be an issue for groundwater flow impediment, so employment development for large office buildings could potentially affect groundwater flows. On balance it is considered that for conventional housing and employment development, and thus piling compared to drawdown from mineral dewatering, a 1km buffer is reasonable for to capture any significant impediment to flow.
- 5.7 When this issue arose during the HRA of the adopted Borough Plan Natural England advised the Borough Council that: *'... the Borough Council, in its role as competent authority, can conclude no adverse effect on the integrity of the SAC at Local Plan level because:*
- 5.8 *(i) A range of viable options to mitigate the effects of the proposed development exist, and therefore the plan can be taken forward with the allocation;*
- 5.9 *(ii) Carrying out the HRA at the lower tier (project) level allows the further groundwater issues to be addressed at the planning application stage when the lower level HRA will still be required as a matter of law'.*
- 5.10 SHA-2 (Arbury) is a large site for 1,525 dwellings adjacent to the SAC and therefore has the greatest potential to affect groundwater or surface water flows to the SAC. However, the policy associated with the SAC specifically states that 'Ensor's Pool should have a minimum buffer zone of 100 m as well as any appropriate mitigation measures in order to ensure that the hydrological pathways to the pool are not compromised' [emphasis added].
- 5.11 Furthermore, the Local Plan includes a policy that requires flood risk assessment regarding all sources including groundwater and which ensures that if groundwater quality cannot be maintained, there will be an assumption against the development proposal (Policy NE4 – Managing flood risk and water quality). This will apply to all development in the Borough, including that in this DPD.
- 5.12 Given the Environment Agency's advice to Warwickshire County Council in 2019 regarding the Minerals Plan, it was recommended in the HRA of the Preferred Options that a further requirement is explicitly added to Policy NE4 that *'All new housing and employment allocations with piled foundations or basements within 1km of Ensor's Pool SAC should undertake a hydrogeological study to confirm that it will not affect groundwater flows or quality at the SAC'. This recommendation has now been added in the Water Quality part of Policy NE4.***

## Recreational Pressure

- 5.13 Consultation with Natural England regarding the adopted Borough Plan initially identified this potential linking impact pathway stemming from an increase in recreational pressure from the net new dwellings, potentially linking to the population of white-clawed crayfish at Ensor's Pool.
- 5.14 The Natural England consultation noted that the crayfish population has been lost, and that this is likely to be as a result of biosecurity issues (crayfish plague). The movement of live fish is the most important route of spread for crayfish plague, with release of non-native crayfish by the general public ranked second and crayfish migration third. While recreational activity associated with fishing could introduce crayfish plague to a site if biosecurity procedures concerning

equipment are not followed, but the risk is classed as ‘extremely low’<sup>18</sup> and there is strong evidence crayfish plague is already present at Ensor’s Pool.

- 5.15 The government campaign Check, Clean and Dry code is the guidance that should be followed to stop the spread of crayfish plague and other non-native invasive species. Details can be found on the Non Native Species Secretariat (NNSS) web pages<sup>19</sup>. In addition to this protocol, it is important for anglers to understand that it is illegal to use any species of crayfish as bait (either alive or dead). Also if fish are being restocked in areas with white-clawed crayfish, they must not come from areas where signal crayfish are present. Further information regarding this is available on the crayfish hub on the Buglife’s website<sup>20</sup>. If signs advertising these requirements are not already present at Ensor’s Pool the Council could liaise with the landowner to ensure such signs are installed.
- 5.16 SHA-2 (Arbury) is adjacent to the SAC and is intended to deliver at least 1,525 dwellings. It therefore has the greatest potential to contribute an increase in recreational visits to the SAC. However, the policy associated with the SAC specifically states that Ensor’s Pool should have a minimum buffer zone of 100 m, which will enable a buffer zone of recreational greenspace to be delivered through master-planning between the development and the SAC (and which is therefore most likely to receive casual recreational visits rather than the SAC beyond it). The policy also requires the creation of a significant area of grassland habitat between Ensor’s Pool and Bermuda Clay Pits to the south, in order to strengthen a south-north recreational flow around the west of Nuneaton.
- 5.17 As documented in the HRA of the submitted Local Plan Natural England ultimately concluded that, against the background of crayfish plague already being present in the SAC and the white-clawed crayfish population having died out, the housing proposed within the Local Plan would not further exacerbate the biosecurity risks that already exist at the site. That same conclusion can be extended to the new Local Plan, particularly regarding carried forward allocations such as SHA-2.
- 5.18 Nonetheless, during the 2020 COVID-19 pandemic there were media reports of antisocial behaviour and extensive littering at Ensor’s Pool. Placing 1,525 net new dwellings close to the SAC increases the risk of such activities even allowing for a 100m separation distance. While this is not necessarily directly threatening to the site’s future potential to host a reintroduction of white-clawed crayfish, **it was recommended in the HRA of the Preferred Options that, for the general health of the SAC, the policy for site SHA-2 (Arbury) includes a requirement for the developer to work with landowners and Natural England to provide support (either financial or in kind through the services of an estate management company for the adjacent development) to aid with litter collection and patrolling of the SAC. The Council ultimately decided that it was unnecessary to include this recommendation in policy because the Council’s Parks Department already have a long lease on the Pool which enables the Council to maintain the area.**

---

<sup>18</sup> CEFAS (The Centre for Environment, Fisheries and Aquaculture Service), Oidtmann, B., Thrush, M., Rogers, D., and Peeler, E. 2005. Pathways for transmission of crayfish plague, *Aphanomyces astaci*, in England and Wales.

<sup>19</sup> <https://www.nonnativespecies.org/what-can-i-do/check-clean-dry/>

<sup>20</sup> <https://www.buglife.org.uk/resources/species-hub/crayfish-hub/>

## In Combination Assessment

5.19 The only potential for in combination effects with Local Plan allocations is likely to arise through either groundwater effects or recreational pressure. Groundwater effects would only arise from other developments within 3km of the SAC. No other local authority lies within 3km of Ensor's Pool SAC and therefore there are no Local Plans for which in combination effects are expected to arise.

## Humber Estuary and Severn Estuary

5.20 The removal or modification of existing weirs to facilitate fish passage is identified as a key action in River Basin Management Plans under the Water Framework Directive. In addition to European eel, the Warwickshire Avon and its tributaries are believed to offer scope for species such as River lamprey, Sea lamprey, Atlantic salmon and Sea trout. Similar scope is believed to exist during the plan's lifetime for River lamprey to reach the Warwickshire tributaries of the Humber Estuary.

5.21 Maintaining or achieving a good standard of water quality (Good Ecological Status under the Water Framework Directive) is considered an appropriate standard for functionally linked watercourses used by migratory fish species ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/307788/river-basin-planning-standards.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307788/river-basin-planning-standards.pdf)) and sufficient flows is a necessary consideration when considering the potential impact of plans on functionally linked watercourses used by migratory fish species and longer term there should be an aspiration to restore connectivity by removing barriers and to improve the quality of our freshwater habitats.

5.22 The Local Plan includes a policy that requires flood risk assessment regarding all sources including groundwater and surface water and which ensures that no increase in flood risk arises either on-site or on surrounding/downstream sites. If water quality cannot be maintained, there will be an assumption against the development proposal (Policy NE4 – Managing flood risk and water quality). This will apply to all development in the Borough, including that in this DPD. These assessments must also account for climate change.

5.23 The policy also states that all new developments should contribute to creating space for water through use of blue and green infrastructure, and where relevant, restoring functional floodplains (flood zone 3b). New developments should also seek opportunities for river restoration and enhancement, e.g., de-culverting, removing structures and reinstating a natural, sinuous river channel. As a minimum all developments are required to provide an 8 m wide undeveloped buffer strip from the watercourse (from top of bank or centreline of culvert) to allow access for routine maintenance and emergency clearance.

5.24 This will ensure that the water quality and flows of the Rivers Anker and Sowe is not compromised by allocations anywhere in the borough, and particularly not by allocations close to either river (i.e. sites SHA3, SEA6, NSHA-2, NSHA-5, NSHA-9, NSHA-14 and NSHA-17). Indeed, the proximity of these sites to the Rivers Anker and Stowe, particularly site SHA3, which is adjacent to the River Anker, potentially provides opportunities to naturalise the flood plain and reduce obstacles to fish passage in the rivers.

## In Combination Assessment

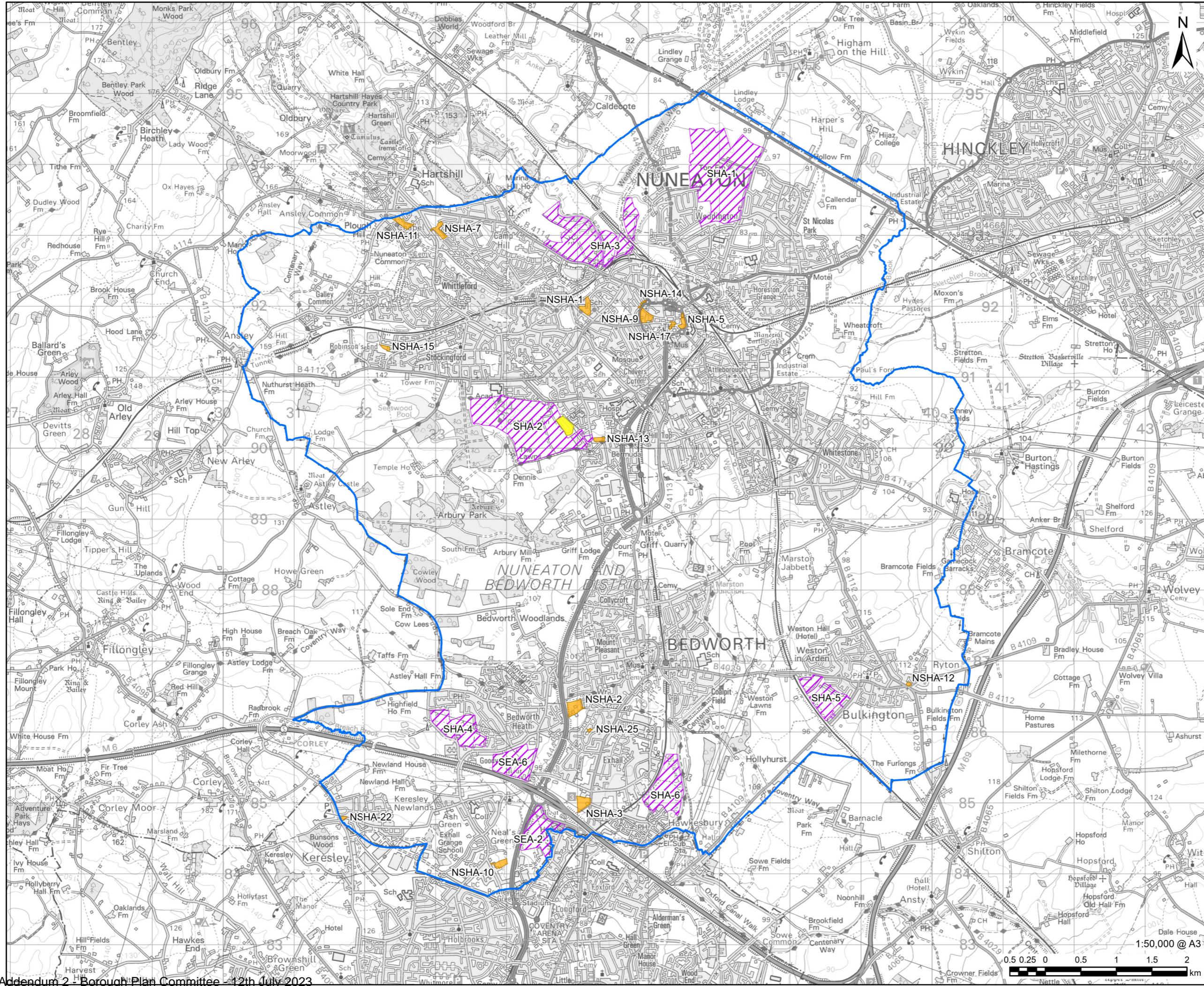
- 5.25 As discussed in the Likely Significant Effects section, the potential for in combination effects with Local Plan allocations exists for all net new development throughout the Anker and Sowe floodplains, particularly where development lies close to or on the rivers. However, the requirements of Policy NE4 would ensure that none of the Nuneaton & Bedworth Local Plan allocations would operate negatively in combination with other plans and projects on the Humber Estuary or Severn Estuary.
- 5.26 Abstraction for the Public Water Supply occurs throughout the Severn Estuary and Humber Estuary surface water and groundwater catchments and could reduce water levels in relevant rivers providing functional linkage for migratory fish. However, all water companies are required to produce Water Resource Management Plans that identify how they intend to meet water need in their supply areas over forthcoming decades (accounting for climate change). These are based on robust population growth estimates. All WRMPs must themselves undergo HRA to either establish that no adverse effect on the integrity of European sites will arise, or to identify and secure compensation for adverse effects on integrity after demonstrating the derogation tests can be met.
- 5.27 The directly relevant WRMP for Nuneaton and Bedworth is that for Severn Trent Water. The water company consulted on their WRMP through to February 2023. The final plan is due to be published in late 2023. It is based on water supply needs and robust population projections to 2085 and thus well beyond the end of the Local Plan period. The WRMP is accompanied by a Habitats Regulations Assessment which The preferred programme includes demand management measures targeted at leakage reduction, water efficiency measures and fitting of enhanced and smart meter technology . For demand-side measures that are likely to require some form of physical intervention or amendment to infrastructure (e.g. pipe repair), some instances of effect pathways might be conceivable but it is not possible to predict or identify specific locations where such measures might be applied. However, the HRA concludes that it is very likely that adverse effects on the integrity of European sites could be avoided at a scheme level following down-the-line scheme specific HRA. Therefore, the Local Plan is not expected to have an adverse effect on integrity in combination with the Severn Trent WRMP.

## 6. Conclusions

- 6.1 This assessment undertook both a Test of Likely Significant Effects and Appropriate Assessment of the policies and any allocations within the Nuneaton and Bedworth Borough Plan Review. Effects on River Mease SAC were scoped out of assessment as was the case with the adopted Borough Plan. However, likely significant effects on Ensor's Pool SAC could not be dismissed due to the presence of numerous allocated sites within the 3km groundwater catchment of the SAC identified by the Environment Agency and, in particular, the presence of Strategic Allocation SHA-2 (Arbury), a large site that lies immediately adjacent to the SAC. Likely Significant Effects on the Severn Estuary SAC/Ramsar and Humber Estuary SAC/Ramsar also could not be dismissed due to the proximity of several allocations to upstream watercourses in the catchment (the River Anker and River Sowe).
- 6.2 An appropriate assessment was then undertaken both alone and in combination with other relevant plans and projects that made the following recommendations regarding Ensor's Pool SAC:
- Given the Environment Agency's advice to Warwickshire County Council in 2019 regarding the Minerals Plan, it is recommended that a further requirement is explicitly added to Policy NE4 that *'All new housing and employment allocations with piled foundations or basements within 1km of Ensor's Pool SAC should undertake a hydrogeological study to confirm that it will not affect groundwater flows or quality at the SAC'*. The Council has added that recommendation to Policy NE4.
  - While this is not necessarily directly threatening to the site's future potential to host a reintroduction of white-clawed crayfish, it is recommended that for the general health of the SAC the policy for site SHA-2 (Arbury) includes a requirement for the developer to work with landowners and Natural England to provide support (either financial or in kind through the services of an estate management company for the adjacent development) to aid with litter collection and patrolling of the SAC. The Council ultimately decided it was not necessary to add these changes to policy because the Council already has a long lease on the Pool which allows it to maintain the area.
- 6.3 Following this assessment it can be concluded that the Local Plan will not pose adverse effects on the integrity of any sites either alone or in combination with other plans or projects. No changes to the Local Plan were identified as being necessary for Severn Estuary SAC/Ramsar or Humber Estuary SAC/Ramsar.



# Appendix A Map of European sites



**PROJECT**  
 Nuneaton & Bedworth  
 Borough Plan Review

**CLIENT**  
 Nuneaton & Bedworth  
 Borough Council

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- LEGEND**
- Nuneaton and Bedworth Borough Boundary
  - Ensor's Pool Special Area of Conservation
  - Strategic Allocation
  - Non-Strategic Allocation

**NOTES**

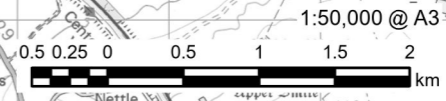
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**ISSUE PURPOSE**  
 FINAL

**PROJECT NUMBER**  
 60673395

**FIGURE TITLE**  
 European Sites and Allocations Around  
 Nuneaton & Bedworth

**FIGURE NUMBER**  
 Appendix A



[aecom.com](http://aecom.com)

Borough Plan Committee - 12<sup>th</sup> July 2023

## **Appendix O**

### **Publication of the Gypsy and Traveller Site Allocations Development Plan Document**

### **Draft Sustainability Appraisal addendum**

# **Nuneaton and Bedworth Gypsy and Traveller Site Allocations DPD**

**SA Report Addendum:**

**Appraisal of Modifications**

June, 2023

## Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
Ian McCluskey Associate Director	Nick Chisholm Batten		

## Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Name</u>	<u>Position</u>
1	May 2023	Draft Appraisal	Ian McCluskey	Associate Director
2	June 2023	Final draft for Client Review	Ian McCluskey	Associate Director
3	July 2023	Final Report	Ian McCluskey	Associate Director

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# Non-Technical Summary

## 1.1 Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Nuneaton and Bedworth Gypsy and Traveller DPD (Thereafter referred to as 'the Plan'). SA is a mechanism for considering and communicating the likely effects of the plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Plan is a legal requirement.

This is a Non-Technical Summary (NTS) of this SA Report Addendum, which is an Addendum to the full SA Report published in November 2021 [Exam ref: CD1.2].

The aim of the SA Report Addendum is essentially to present information on the proposed modifications, and alternatives where appropriate, with a view to informing the forthcoming consultation and subsequent plan finalisation.

## 2.1 Scope

The scope of the SA work, with respect to the Plan Review, is introduced within the SA Report published in November 2021 [Exam ref: CD1.2]. Essentially, the scope is reflected in a list of sustainability objectives and guiding questions, which collectively provide a methodological 'framework' for appraisal. The SA objectives are listed in Table 1 below.

**Table 1: Sustainability Objectives**

### Sustainability Objectives

---

#### **Economy**

Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants, through on-going investment (public and private)

---

#### **Housing**

Provide decent housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments

---

#### **Equality**

Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location

---

#### **Crime**

Reduce crime, fear of crime and antisocial behaviour

---

#### **Deprivation**

Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage

---

#### **Recreation**

Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer

---

#### **Sense of place**

Encourage land use and development that creates and sustains well-designed, high quality built environments, that help to create and promote local distinctiveness and sense of place

## Sustainability Objectives

---

### **Biodiversity**

To protect and enhance the natural environment, habitats, species, landscapes and inland waters

---

### **Population and Human Health**

Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing equitable access to health services

---

### **Soil**

To protect and improve soil quality

---

### **Natural resource efficiency**

Use natural resources such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment

---

### **Water**

Ensure that new developments minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas

---

### **Sustainable Travel**

Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents

---

### **Existing infrastructure**

Ensure development is primarily focused in urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car

---

### **Energy**

Reduce overall energy use through increased energy efficiency

---

### **Climate change mitigation**

Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial, and industrial sources

---

### **Waste and recycling**

Encourage and enable waste minimisation, reuse, recycling, and recovery to divert resources away from the waste stream, including the use of recycled materials where possible

---

### **Land use**

To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land

---

### **Cultural Heritage**

To conserve and enhance the historic environment

---

### **Landscape**

To maintain and enhance the quality of landscapes

---

### 3.1 Screening of Proposed Modifications

As a result of the Examination of the Plan, a number of main modifications and additional modifications to the submitted Gypsy and Traveller Plan have been proposed. It is necessary to screen the modifications to determine if they significantly affect the findings of the main SA Report [Exam ref: CD1.2] and if further appraisal work is therefore required.

The additional modifications are largely to rectify minor issues, presentation, grammar and for clarity. Therefore, none are considered to have implications for the SA findings.

All of the proposed Main Modifications have been screened to determine if further SA work is required or if they can be screened out from further appraisal work. The proposed changes and detailed findings of the screening including the rationale for why a main modification was screened in or out are provided in Appendix A of this SA Report Addendum.

The majority of modifications involve edits to the Plan text for clarification, factual correction, to enhance readability or other minor reasons and have therefore been screened out as not being significant in terms of the SA (i.e. they would be inherently unlikely to give rise to significant effects or affect the overall conclusions).

The screening of the proposed Main Modifications (Appendix A) found that the majority of modifications would not be likely to have a significant effect on the findings of the previous SA work presented in the main SA Report [Exam ref: CD1.2]. This is because the changes do not fundamentally alter the thrust of the policies.

Only the following Modifications were identified that required further consideration in the SA at this stage. These are as follows:

#### **MM10 – Changes to Policy GT2**

The change removes a hierarchical approach to the delivery of gypsy and traveller pitches. Instead, a range of suitable situations are identified, each of which need to demonstrate compliance with a range of criteria (previously reflected in Policy H3 of the Adopted Borough Plan).

#### **MM13 – Additional requirements for site allocations under GT3**

Additions to key delivery considerations could potentially have implications for the SA findings.

### 4.1 Consideration of alternatives

The Council explored whether there were any reasonable alternatives in relation to the proposed Main Modifications. It was considered that no alternatives were reasonable or needed to be appraised through further SA work.

### 5.1 Appraisal of Modifications

The appraisal identifies that the Modifications would lead to limited changes to the sustainability appraisal findings (compared to the Submission version of the Plan) when considering the overall effects of the Plan 'as a whole'. However, though the significance of effects remains unchanged for most SA Objectives, there are some differences between the Submitted Version of the Plan and the version with Modifications that are worth discussing.

The key differences are summarised below:

- The Modifications provide more flexibility in selection of additional sites, and therefore there are improvements in relation to 'Housing'.

- The requirement for a formal play space at the Winter Oak sites improves the performance of the Plan in terms of ‘Recreation’.
- The requirement for measures to manage pollution, sewerage and drainage on the allocated sites improves the performance of the Plan in terms of ‘Water’.
- Greater support / enablement of sites to come forward in urban locations and on previously developed land ought to be preferable with regards to ‘Land Use’, ‘Landscape’ and ‘Soil’.
- There is less specific requirements in relation to sustainable travel and accessibility in relation to where new gypsy and traveller sites should be located. This could be a less proactive approach than the Submitted version of the Plan.
- There are some uncertainties whether effects would be different in relation to ‘Historic Environment’, Existing Infrastructure’ and ‘Deprivation’. This relates to the greater uncertainty about where new additional sites would be located. Nevertheless, significant effects would not be anticipated given other plan provisions.

## 6.1 Mitigation and enhancement

No further mitigation or enhancement measures were identified at this stage.

## 7.1 Monitoring

No significant effects have been identified at this stage. Therefore, the monitoring indicators identified in the main SA Report remain unchanged. The monitoring framework will be finalised following adoption.

## 8.1 Next Steps

Following consultation, the Inspector(s) will consider all representations received, before deciding how to report on the Plan’s soundness. Assuming that the Inspector is ultimately able to find the Plan ‘sound’, it will then be adopted by the Council. At the time of adoption an ‘SA Statement’ will be published that explains the process of plan-making/SA in full and presents ‘measures decided concerning monitoring’.

# 1. Introduction

## 1.1. Background

- 1.1.1 Nuneaton and Bedworth Council is preparing a Gypsy and Traveller Allocations Development Plan Document (thereafter referred to as 'the Plan'). The Plan is at an advanced stage, having gone through various rounds of consultation and is currently at public examination.
- 1.1.2 A number of modifications are being proposed to the Plan. It is important to explore whether these changes will affect sustainability appraisal findings.

## 1.2. Sustainability Appraisal (SA)

- 1.2.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Plan. SA is a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

## 1.3. Purpose and Structure of this SA Report Addendum

- 1.3.1 The aim of this SA Report Addendum is to present information on the proposed main modifications with a view to informing further consultation and subsequent plan finalisation.
- 1.3.2 This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report published in November 2021 [Exam ref: CD1.2]. This SA Report Addendum is structured as follows:
- **Section 2** - presents the scope of the SA;
  - **Section 3** - explains the method and presents the findings of the screening of proposed modifications;
  - **Section 4** - sets out consideration of alternatives;
  - **Section 5** – sets out an appraisal of the screened in Modifications;
  - **Section 6** – considers mitigation and enhancement; and
  - **Section 7** – discusses the next steps.

# 2. What's the scope of the SA?

## 2.1. The SA Framework

- 2.1.1 The scope of the SA work, with respect to the Gypsy and Traveller Plan is introduced within the SA Report, and was set out in detail within a scoping report. The scope is reflected in a list of sustainability objectives and supporting 'guiding criteria', which collectively provide a methodological 'framework' for appraisal.
- 2.1.2 The SA Objectives and guiding criteria are listed below in Table 2.1. It has not been necessary to update or revise the SA framework for the purposes of appraisal work at this stage.

**Table 2.1: The SA Framework**

<b>SA Objective</b>	<b>Guiding criteria (will the proposal...)</b>
<p><b>Economy</b> Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants, through on-going investment (public and private)</p>	<ul style="list-style-type: none"> <li>• Will it meet the employment needs of the local community?</li> <li>• Will it help diversify the economy?</li> <li>• Will it support small businesses?</li> <li>• Will it maintain a balanced mix of development?</li> </ul>
<p><b>Housing</b> Provide decent housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments</p>	<ul style="list-style-type: none"> <li>• Will it promote a range of housing types and tenure?</li> </ul>
<p><b>Equality</b> Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location</p>	<ul style="list-style-type: none"> <li>• Will it maintain and enhance existing facilities?</li> <li>• Will it put unacceptable pressure on existing services and community facilities?</li> <li>• Will it improve access to local services and facilities?</li> <li>• Will it ensure that education and skills infrastructure meet projected future demand and need?</li> <li>• Will it reduce inequalities in education and skills across the Borough?</li> </ul>
<p><b>Crime</b> Reduce crime, fear of crime and antisocial behaviour</p>	<ul style="list-style-type: none"> <li>• Will it promote the reduction of crime rates?</li> <li>• Will it encourage the adoption of principles to 'design out' crime in housing and employment sites?</li> </ul>
<p><b>Deprivation</b> Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage</p>	<ul style="list-style-type: none"> <li>• Will it reduce poverty and exclusion in those areas most effected?</li> </ul>
<p><b>Recreation</b> Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer</p>	<ul style="list-style-type: none"> <li>• Will it ensure that facilities and locations for cultural activities are protected?</li> <li>• Will it protect and create high quality or valued recreational spaces and avoid erosion of recreational function?</li> </ul>

**SA Objective**

**Guiding criteria (will the proposal...)**

**Sense of place**

Encourage land use and development that creates and sustains well-designed, high quality built environments, that help to create and promote local distinctiveness and sense of place

- Will it require good urban design to create attractive, high quality environments where people will choose to live, work and invest?

**Biodiversity**

To protect and enhance the natural environment, habitats, species, landscapes and inland waters

- Will it protect and enhance species, habitats and sites at risk?
- Will it protect and enhance the natural environment, whether designated or not, including habitats, species, landscapes and controlled waters, particularly maintaining European sites, SSSIs and LNRs to a favorable standard?
- Will it support development that incorporates improvements to wildlife habitats?
- Will it increase access to green spaces?
- Will it contribute to adaptation to climate change and ecological networks?

**Population and Human Health**

Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing equitable access to health services

- Will it diminish inequalities in mortality, health and wellbeing across the Borough?
- Will it promote healthy lifestyles and opportunities for exercise?
- Will it promote opportunities to participate in sport?
- Will it protect, provide and enhance the provision of quality open space?
- Will it prevent noise and light pollution?

**Soil**

To protect and improve soil quality

- Will it minimise development on Greenfield land?
- Will it reduce the amount of derelict, degraded and underused land?
- Will it reduce the quantity of contaminated land in the Borough?

**Natural resource efficiency**

Use natural resources such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment

- Will it promote the balance between water supply and demand?
- Will it encourage water efficiency and conservation?
- Will it minimise adverse effects in ground and surface water quality?
- Will it protect and enhance the quality of watercourses?



## SA Objective

## Guiding criteria (will the proposal...)

### Water

Ensure that new developments minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas

- Will it avoid developments in areas being at risk from fluvial, sewer or groundwater flooding?
- Will it provide habitat creation?
- Will it support the connection of blue corridors

### Sustainable Travel

Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents

- Will it maintain and improve local air quality?
- Will it reduce traffic congestion and improve road safety?

### Existing infrastructure

Ensure development is primarily focused in urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car

- Will it focus development in the major urban areas?
- Will it promote compact, mixed-use developments with good accessibility to local facilities and service that reduce the need to travel?
- Will it reduce the number and length of journeys made by car?
- Will it promote alternative, more sustainable modes of transport to the car (including walking and cycling) through location of housing, employment sites, services and facilities, and appropriate infrastructure for sustainable modes of transport?

### Energy

Reduce overall energy use through increased energy efficiency

- Will it reduce or minimise greenhouse gas emissions?
- Will it increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating and transportation?

### Climate change mitigation

Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial, and industrial sources

- Will it contribute to the creation of a low carbon economy and minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources?
- Will it promote the adoption of climate change adaption and climate proofing principles in planning and design?
- Will it promote sustainable urban drainage systems?

### Waste and recycling

Encourage and enable waste minimisation, reuse, recycling, and recovery to divert resources away from the waste stream, including the use of recycled materials where possible

- Will it reduce waste arising (household and commercial)?
- Will it increase recycling and composting rates and encourage easily accessible recycling systems?
- Will it promote re-use of resources?

SA Objective	Guiding criteria (will the proposal...)
<p><b>Land use</b> To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land</p>	<ul style="list-style-type: none"> <li>• Will it encourage land use and development that optimises the use of previously developed land and buildings?</li> <li>• Will it encourage development which makes more efficient use of land; and seek greater intensity of development at places with good public transport accessibility?</li> </ul>
<p><b>Cultural Heritage</b> To conserve and enhance the historic environment</p>	<ul style="list-style-type: none"> <li>• Will it conserve and enhance sites, features and areas of historical, archaeological and cultural value?</li> </ul>
<p><b>Landscape</b> To maintain and enhance the quality of landscapes</p>	<ul style="list-style-type: none"> <li>• Will it enhance and manage the character and appearance of the Borough's landscapes, maintaining and strengthening local distinctiveness and sense of place?</li> </ul>

## 3. Screening of Proposed Modifications

### 3.1. Introduction

3.1.1 A number of 'additional' and Main Modifications to the submitted Plan are proposed as a result of the examination hearing sessions and representations received. It is necessary to screen these modifications to determine if they could significantly affect previous SA findings and if further appraisal work is therefore required.

### 3.2. Method

3.2.1 All of the proposed Main Modifications were screened to determine if further SA work was required or if they could be screened out from appraisal. The findings of the screening exercise, including the rationale for why a modification was screened in or out, are provided in Appendix 1.

3.2.2 The majority of modifications involve minor edits to the Plan text for clarification, factual correction, to enhance readability or other minor reasons and have therefore been screened out as not being significant in terms of requiring further exploration through the SA (i.e. they would be inherently unlikely to give rise to significant effects).

3.2.3 Where modifications are identified as potentially giving rise to significant effects, then additional appraisal work has been undertaken.

### 3.3. Screening Findings

3.3.1 The screening of the proposed Main Modifications (**Appendix 1**) found that the majority of modifications would not be likely to have a significant effect on the findings of the previous SA work presented in the November 2021 [Exam ref: CD1.2]. This is because the changes do not fundamentally alter the thrust of the policies when considering the Plan 'as a whole'.

3.3.2 Several modifications have been identified as requiring further consideration through the SA process. These are as follows:

### **MM10 – Changes to Policy GT2**

- 3.3.3 The change removes a hierarchical approach to the delivery of gypsy and traveller pitches. Instead, a range of suitable situations are identified, each of which need to demonstrate compliance with a range of criteria (previously reflected in Policy H3 of the Adopted Borough Plan).

### **MM13 – Additional requirements for site allocations under GT3**

- 3.3.4 Additions to key delivery considerations could potentially have implications for the SA findings.

## **3.4. Appraising modifications**

- 3.4.1 Each of the modifications that have been 'screened-in' have been considered in further detail; covering the following elements:
- Consideration of reasonable alternative approaches
  - Appraisal against the SA framework
  - Potential for mitigation / enhancement
  - Monitoring

## 4. Consideration of alternatives

### 4.1. Appraising modifications

4.1.1 For each modification that has been screened-in, the potential for alternative approaches has been considered. This is discussed below.

#### **MM10 – Changes to Policy GT2**

4.1.2 The changes proposed are an alternative to the approach within the Submission version of the Plan (i.e. a hierarchical approach to site delivery). The Council have not identified any further alternatives with regards to Policy GT2.

#### **MM13 – Additional requirements for site allocations under GT3**

4.1.3 The modifications being proposed are based on enhancement / mitigation and do not lend themselves to the testing of reasonable alternatives.

## 5. Appraisal of the modifications

### 5.1. Introduction

- 5.1.1 The Main Modifications that are ‘screened-in’ have been appraised in further detail against the full SA Framework. The findings are discussed below, first summarising the predicted effects of the submission version of the Plan review, and then commenting on the implications that the modifications have in relation to these effects. This helps to provide a context for which the modifications are being appraised within.
- 5.1.2 In some instances, the effects are not predicted to be significantly different as a result of the modifications, but it has been possible to discuss whether the modifications are generally more or less beneficial with regards to a particular SA topic.
- 5.1.3 Following the discussion of each topic is a table summarising how each ‘iteration’ of the Plan performs with regards to the SA topic ‘relative to each other’. It could be the case that positive effects are predicted in both iterations, but that it is possible to conclude on the overall rank of preference.
- 5.1.4 The two iterations covered are: the proposed version of the Plan at Submission stage; and, the Plan incorporating the main modifications.

### 5.2. SA Objective 1

#### Summary of effects of the Plan on Economy (Submission version)

- 5.2.1 Mainly neutral effects / limited relationship. However, some minor positive effects are predicted due to the proximity of Winter Oak site to employment (which could have benefits for residents).

#### Implications of modifications

- 5.2.2 The modifications that have been screened in are unlikely to significantly affect the SA findings in relation to Economy. The additional key development requirements are unlikely to affect schemes in terms of economic factors. The amended strategy is more flexible in terms of the use of land for gypsy and traveller accommodation, which could possibly involve land that might also be suitable for employment uses (such as previously development land / urban windfall sites). However, the magnitude of effects are likely to be very small and thus the overall effects are predicted to be the same (i.e. minor positive effects).

	Submission Plan	Plan review with modifications
<i>Rank</i>	-	-

### 5.3. SA Objective 2

#### Effects of the Plan on Housing (Submission version)

5.3.1 Significant positive effects are predicted through the allocation of sites to meet identified housing needs for specific communities.

#### Implications of modifications

5.3.2 The modifications are considered to be positive with regards to housing, but this does not change the already significantly positive effects predicted within the Submitted version of the Plan. The modifications for GT2 are considered to support a wider range of potential locations that could be suitable for gypsy and traveller sites compared to a more hierarchical approach. As such, this approach is considered more preferable with regards to the Housing SA Objective.

	Submission Plan	Plan review with modifications
<i>Rank</i>	2	1

### 5.4. SA Objective 3

#### Effects of the Plan on Equality (Submission version)

5.4.1 Mixed effects are recorded. On one hand, significant positive effects are predicted due to meeting the needs of an ethnic minority group. However, minor negative effects are also predicted due to a pattern of poor accessibility likely being maintained.

#### Implications of modifications

5.4.2 The allocations remain the same, and so in this respect, the effects are no different with regards to equality factors. In terms of additional provision, it is uncertain what the effects would be as any number of sites could be considered suitable. However, there is no firm requirement for sites to have good access to essential services, and so minor negative effects remain. The submission version provided a hierarchical approach that prioritised sites with good access to services (i.e. within 1.6km) before exploring other options. This could be more likely to bring about sites with comparable access to services to other communities. However, the modifications would still support accessible development, as well as supporting growth in the urban areas, which are likely to have good accessibility. On balance, there is little to differentiate the approaches within regards to equality.

	Submission Plan	Plan review with modifications
<i>Rank</i>	-	-

## 5.5. SA Objective 4

### Effects of the Plan on Crime (Submission version)

5.5.1 Neutral effects are predicted, as there is no clear relationship with this SA Objective.

#### Implications of modifications

5.5.2 The modifications are unlikely to have an effect on crime, as the changes proposed are unrelated to this SA Objective. Therefore, both 'versions' of the Plan are ranked the same in this respect.

	Submission Plan	Plan review with modifications
<i>Rank</i>	-	-

## 5.6. SA Objective 5

### Effects of the Plan on Deprivation (Submission version)

5.6.1 Neutral effects are predicted as there is no link between the allocated sites, supporting policies and locations experiencing multiple deprivation.

#### Implications of modifications

5.6.2 The changes to GT2 are more supportive of sites within the urban areas. This could mean that gypsy and traveller sites are permitted in areas that overlap with deprived communities. This could possibly bring some tensions and a sense that 'less desirable' development has been directed to areas experiencing deprivation. However, there is a great deal of uncertainty in respect of what additional sites would be involved, and it could also be possible to successfully integrate communities in urban areas. Neutral effects are predicted, but there is uncertainty and it is unclear which version of the Plan performs most favourably with regards to deprivation.

	Submission Plan	Plan review with modifications
<i>Rank</i>	?	?

## 5.7. SA Objective 6

### Effects of the Plan on Recreation (Submission version)

5.7.1 Minor negative effects are predicted as there may be limited access to formal open space at the allocated sites.

#### Implications of modifications

5.7.2 The modifications add a clause requiring a formal play area for GTSA3, which adds positive effects in respect of recreation. There is still not ideal access to recreation opportunities at the other existing / allocated sites. Policy GT2 does state that any additional new sites will need to have 'reasonable access to essential services', but it is unclear whether this means access to play and green space. As such, though the modifications are an improvement with regards to 'Recreation' at one of the site allocations, the overall effects are still considered to be minor negative.

	<b>Submission Plan</b>	<b>Plan review with modifications</b>
<i>Rank</i>	2	1

## 5.8. SA Objective 7

### Effects of the Plan on Sense of Place (Submission version)

5.8.1 Minor positive effects are predicted as the allocations promote intensification of existing sites and management of amenity impacts.

#### Implications of modifications

5.8.2 The modifications are unlikely to have any significant implications with regards to design of development and how this affects 'sense of place'. As such, minor positive effects remain. It is not possible to differentiate performance / rank of the two versions of the Plan.

	<b>Submission Plan</b>	<b>Plan review with modifications</b>
<i>Rank</i>	-	-

## 5.9. SA Objective 8

### Effects of the Plan on Biodiversity (Submission version)

5.9.1 Neutral effects are predicted as there are no direct links or secondary effects likely on designated habitats or locally important habitats.

#### Implications of modifications

5.9.2 The allocations remain the same, and the policy criteria for GT2 includes reference to the need to consider biodiversity impacts when determining suitability of new sites. Therefore, the modifications have no implications for the SA findings with regards to biodiversity (with neutral effects remaining).

	<b>Submission Plan</b>	<b>Plan review with modifications</b>
<i>Rank</i>	-	-



## 5.10. SA Objective 9

### Effects of the Plan on Health (Submission version)

- 5.10.1 Minor negative effects are predicted as the sites are unlikely to promote active lifestyles and are not ideally located to health facilities. Minor positives are also predicted, as having a settled community is beneficial for wellbeing.

### Implications of modifications

- 5.10.2 On one hand modifications to GT3 are likely to be positive with regards to health, as there is a firm requirement for a play space at one of the site allocations. However, this is unlikely to change the significance of the effects from minor given the small magnitude of effects. Conversely, modifications to GT2 could lead to additional sites being acceptable that are not well-located with regards to services. It is debateable what constitutes 'reasonable access' to services, and in some instances this could lead to sites being approved in sub-optimal locations. On the flip-side, the policy supports development un urban areas, which are generally better served by health and education facilities – which is not the case for some existing Gypsy and Traveller sites (which would be prioritised for expansion if possible under the submission version of the Plan). On balance, the effects of the modifications are unlikely to alter in significance (both positive and negative), and it is difficult to clearly identify which version of the Plan performs best with regards to health.

	Submission Plan	Plan review with modifications
<i>Rank</i>	-	-

## 5.11. SA Objective 10

### Effects of the Plan on Soil (Submission version)

- 5.11.1 Neutral effects are predicted. The allocated sites are very small scale, and despite being classified as Grade 3 agricultural land, they are already in use.

### Implications of modifications

- 5.11.2 The allocated sites remain the same, and therefore effects on soil are unchanged in this respect. The approach to identifying suitable additional sites is less hierarchical, and is also supportive of previously developed land and land in the urban areas. It could therefore be slightly more likely to avoid the loss of agricultural land, which is a slight improvement on the submission version of the Plan (but not to the extent that the significance of effects will change from neutral).

	Submission Plan	Plan review with modifications
<i>Rank</i>	2	1

## 5.12. SA Objective 11

### Effects of the Plan on Resource Efficiency (Submission version)

5.12.1 Neutral effects are predicted. Sites are very small scale and opportunities for higher levels of resource efficiency on sites are limited.

#### Implications of modifications

5.12.2 There are no links between the modifications are resource efficiency, as such neutral effects remain.

	Submission Plan	Plan review with modifications
<i>Rank</i>	-	-

## 5.13. SA Objective 12

### Effects of the Plan on Water (Submission version)

5.13.1 Neutral effects are predicted as none of the sites are at significant risk of flooding, nor is water pollution likely.

#### Implications of modifications

5.13.2 The modifications relating to GT3 site allocations sets out new direct requirements for the allocated sites with regards to the need to avoid contamination and to ensure suitable access to waste water and drainage. The policy for GT2 also sets out this same requirement for any further potential sites. Though this would be expected of developments, the clarity provided and need to liaise with stakeholders to ensure appropriate arrangements should lead to some minor positive effects. This is an improvement on the submission version of the Plan.

	Submission Plan	Plan review with modifications
<i>Rank</i>	2	1

## 5.14. SA Objective 13

### Effects of the Plan on Sustainable Travel (Submission version)

5.14.1 Minor negative effects are predicted as the allocated sites are not attractive for walking and cycling.

#### Implications of modifications

5.14.2 The allocated sites are the same and so minor negative effects remain in this respect. Additional sites that come forward could potentially be located in sustainable locations in urban areas, but equally so could potentially be in areas that are more isolated with only 'reasonable access' to services and transport. There is a degree of uncertainty as it depends on the location of future sites and also the interpretation of 'reasonable' when decisions are made regarding accessibility. The submitted version of the Plan gave a more defined requirement of 1.6km to key services and required safe access by foot (and this was also a sequentially preferred approach).

5.14.3 Therefore, the modified version of the Plan is deemed to be slightly less preferable (though the significance of effects is considered to stay the same).

	<b>Submission Plan</b>	<b>Plan review with modifications</b>
<i>Rank</i>	1	2

### 5.15. SA Objective 14

#### Effects of the Plan on Existing Infrastructure (Submission version)

5.15.1 The allocated sites can make use of existing infrastructure for drainage, roads, and waste collection. Though social infrastructure is not all ideally located, it can still be accessed. Therefore, neutral effects are predicted.

#### Implications of modifications

5.15.2 The allocated sites remain and thus the effects are the same in this respect. In terms of additional sites, the changes to policy GT2 could be considered more likely to involve sites on previously developed land and in the urban areas (which were not explicitly mentioned in the Submission Version). This could help make use of existing infrastructure slightly better, but there is great uncertainty as the sites involved are unknown at this stage. The unmodified policy would also support sites with good accessibility and adjacent to existing sites, making use of infrastructure. Therefore, the differences are small.

	<b>Submission Plan</b>	<b>Plan review with modifications</b>
<i>Rank</i>	?	?

### 5.16. SA Objective 15

#### Effects of the Plan on Energy (Submission version)

5.16.1 Neutral effects are predicted given the small magnitude of effects and limited relationship between the objective and the Plan policies.

#### Implications of modifications

5.16.2 The modifications are unlikely to have any further effects with regards to energy, and thus neutral effects remain.

	<b>Submission Plan</b>	<b>Plan review with modifications</b>
<i>Rank</i>	-	-

## 5.17. SA Objective 16

### Effects of the Plan on Climate Change Mitigation (Submission version)

5.17.1 Neutral effects are predicted. Though allocated sites could encourage car travel, it also provides a permanent accommodation for travellers, reducing the amount of transit travelling. Limited opportunities to minimise energy usage.

#### Implications of modifications

5.17.2 The sites allocated remain the same, and the criteria for selecting sites support accessible sites.

	Submission Plan	Plan review with modifications
<i>Rank</i>		

## 5.18. SA Objective 17

### Effects of the Plan on Waste and Recycling (Submission version)

5.18.1 Minor positive effects are predicted as policies require adequate waste storage, and existing sites should benefit from existing collection regimes.

#### Implications of modifications

5.18.2 There are no significant changes with regards to waste and recycling as a result of the Modifications. As such, the effects remain minor positive.

	Submission Plan	Plan review with modifications
<i>Rank</i>	-	-

## 5.19. SA Objective 18

### Effects of the Plan on Land Use (Submission version)

5.19.1 Minor positive effects are predicted due to the avoidance of greenfield land when allocating sites / identifying new space for accommodation.

#### Implications of modifications

5.19.2 The allocated sites remain the same, and therefore effects on land use are unchanged in this respect. The approach to identifying suitable additional sites is less hierarchical, and is also supportive of previously developed land. It could therefore be slightly more likely to avoid the loss of greenfield land, which is a slight improvement on the submission version of the Plan (but not to the extent that the significance of effects will change from minor).

	Submission Plan	Plan review with modifications
<i>Rank</i>	2	1

## 5.20. SA Objective 19

### Effects of the Plan on Historic Environment (Submission version)

5.20.1 Neutral effects are predicted as the allocated sites are not in sensitive locations with regards to heritage and the scale of growth is small.

#### Implications of modifications

5.20.2 Neutral effects are likely to remain given that the allocations have not changed. Though the approach to the delivery of further sites is different, without knowing locations it is uncertain what the implications would be for heritage. Given that there are requirements to take account of heritage assets in the site identification process, it is considered that neutral effects can still be concluded at this strategic level.

	Submission Plan	Plan review with modifications
<i>Rank</i>	-	-

## 5.21. SA Objective 20

### Summary of effects of the Plan on Landscape (Submission version)

5.20.3 Neutral effects are predicted as the allocated sites are currently in use / not sensitive, development is small scale and mitigation is required.

#### Implications of modifications

5.20.4 The change in strategy is unlikely to lead to significantly different sites being brought forward, but there is an explicit mention of urban sites and previously developed sites. Broadly speaking, such sites could be less likely to have negative effects on landscape character compared to extensions to existing sites in countryside locations, or new sites provided they are within 1.6km of key services (which are prioritised in a hierarchy in the submission version of the plan). Therefore, whilst both approaches are predicted to have neutral effects, the modifications are likely to be slightly more effective in terms of protecting landscapes.

	Submission Plan	Plan review with modifications
<i>Rank</i>	2	1

## 5.22. Summary of Effects

5.22.1 The previous sections discuss how the modifications are likely to affect each of the Sustainability Objectives. Whilst several implications have been identified (both positive and negative), these do not change the significance of the effects when compared to the Submission version of the Plan. This is reflected in table 5.1 below, which shows the effects of the Submission version of the Plan, a brief commentary on the implications of the Modifications, and finally the 'residual' effects of the modified version of the Plan. The key differences in effects are as follows:

- Effects upon water have changed from neutral to minor positive effects, due to the insertion of policy clauses relating to drainage and pollution control on allocated sites.
- There is increased uncertainty in relation to deprivation, as it is possible that supporting sites within the urban areas could overlap with deprived communities.

- There is some uncertainty relating to sustainable travel objectives, as the modified approach is less prescriptive with regards to accessibility.

**Table 5.1: Summary of SA findings**

Topic/Objective	Effects of Submission Plan	Implications of the modifications	Effects taking account of modifications
1. Economy	Minor positive	None	Minor positive
2. Housing	Significant positive	Improvement	Significant positive
3. Equality	Significant positive Minor negative	None	Significant positive Minor negative
4. Crime	Neutral	None	Neutral
5. Deprivation	Neutral	Uncertain	Neutral ?
6. Recreation	Minor negative	Improvement	Minor negative
7. Sense of place	Minor positive	None	Minor positive
8. Biodiversity	Neutral	None	Neutral
9. Health	Minor positive Minor negative	Limited	Minor positive Minor negative
10. Soil	Neutral	Improvement	Neutral
11. Resource efficiency	Neutral	None	Neutral
12. Water	Neutral	Improvement	Minor positive
13. Sustainable Travel	Minor negative	More negative?	Minor negative?
14. Existing infrastructure	Neutral	Uncertain	Neutral
15. Energy	Neutral	None	Neutral
16. Climate change mitigation	Neutral	None	Neutral
17. Waste and recycling	Minor positive	None	Minor positive
18. Land use	Minor positive	Improvement	Minor positive
19. Historic Environment	Neutral	Uncertain	Neutral
20. Landscape	Neutral	Improvement	Neutral

## 5.23. Ranking

5.23.1 Though the significance of effects as remained the same for the majority of SA Objectives, it has been possible to comment on whether the modifications contribute more positively toward the objective or not. This allows the two versions of the plan to be compared and relatively ranked. For several of the SA objectives, there has been limited change, and the different plan versions are ranked on par with each other (represented by the - symbol in table 5.2 below). The modifications serve to improve the performance against several SA Objectives relatively speaking including SA2 Housing, SA6 Recreation, SA10 Soil, SA12 Water, and SA20 Landscape. There is one instance where the Submitted version of the Plan is ranked relatively better than with the Modifications, which is for SA13 Sustainable Travel. For three SA Objectives it is uncertain whether the modifications would be an improvement on the Submitted version of the plan (SA5 Deprivation, SA14 Existing Infrastructure, SA19 Historic Environment).

**Table 5.2: Rank of performance**

SA Objective	Submission Plan	Plan with modifications
1. Economy	-	-
2. Housing	2	1
3. Equality	-	-
4. Crime	-	-
5. Deprivation	?	?
6. Recreation	2	1
7. Sense of place	-	-
8. Biodiversity	-	-
9. Health	-	-
10. Soil	2	1
11. Resource efficiency	-	-
12. Water	2	1
13. Sustainable Travel	1	2
14. Existing infrastructure	?	?
15. Energy	-	-
16. Climate change mitigation	-	-
17. Waste and recycling	-	-
18. Land use	2	1
19. Historic Environment	?	?
20. Landscape	2	1

## 6. Mitigation and enhancement

- 6.1.1 Where modifications are predicted to result in less positive effects (e.g. for carbon emissions and air quality), this is due to less prescriptive / less challenging policy measures. There are no mitigation or enhancement measures that would alter this position. It is also noted that the even with modifications in place, the Plan will still have a more positive effect in relation to these SA topics when compared to the relevant policies in the Adopted Local Plan.
- 6.1.2 For some topics, the modifications lead to improved outcomes for SA topics (i.e. historic environment / landscape / housing). Therefore, the Modifications in and of themselves are considered to constitute 'mitigation/enhancement'. No further measures are considered necessary at this stage.

## 7. Next steps

### 7.1. Monitoring

- 7.1.1 The SA Report [Exam ref: CD1.2] submitted alongside the Local Plan presented a range of 'measures envisaged concerning monitoring'.
- 7.1.2 The modifications are not likely to lead to significant changes to the SA findings, and therefore, it is considered unnecessary to identify further monitoring measures to address significant effects.
- 7.1.3 A final list of monitoring measures will be presented within the SA Statement produced once the Local Plan is adopted. This could include updates to reflect any changes to the Council's proposed monitoring framework for the Plan.

### 7.2. Plan Finalisation

- 7.2.1 Following consultation on the modifications and supporting evidence (including this SA Addendum), the Inspectors will consider all representations received, before deciding how to report on the Plan's soundness.
- 7.2.2 Assuming that the Inspectors are ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.



## APPENDIX A: SCREENING THE MAIN MODIFICATIONS

# **Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD**

**Inspector: Thomas Hatfield BA (Hons) MA MRTPI**

**Programme Officer: Helen Wilson**

**Reference: PINS/W3710/429/5**

## **CD 6.2 - Schedule of Main Modifications**

(Further Additional Modifications are provided in CD 6.3).

**June 2023**

This document (CD 6.2) provides details of the Main Modifications that are recommended by the Inspector to make the DPD sound and legally compliant.

The Additional Modifications found in the separate document (CD 6.3) are those which do not materially affect the Policies in the DPD, but which are generally minor factual updates; corrections of any errors or which are considered necessary for clarity.

Main Modification Reference	DPD Sub Section / Paragraph / Policy box /table / Page number of amended DPD	Proposed Main Modification. (New words added in bold and underlined. Deletions stricken through.)	Reasons for modification	SA Screening
MM1	'1.0 Introduction'/ Paragraph 1.2/ Page 1	Alter minor wording and add text at end of paragraph to read: "1.2 Policies DS4 – Overall development needs and H3 – Gypsies and Travellers set out the need for new pitches by 2031/2032 to be at least 39 residential and 5 transit pitches. Policy H3 does not set out where the new pitches would be provided but sets out the criteria that will be used to identify potential locations for residential and permanent pitches through the Gypsy and Traveller Site Allocations Development Plan Document (DPD). It is through this DPD that land <u>is</u> identified and allocated for future traveller sites. <b><u>Policy H3 of the current adopted Borough Plan (2011-2031) is superseded entirely by the DPD and in the emerging Borough Plan Policy H3 will purely refer to the DPD for Policies relating to Gypsy, Travellers and Showperson pitches and plots.</u></b> "	To make clear that Policy H3 of the current adopted Borough Plan (2011-2031) is superseded by the Gypsy and Traveller Site Allocations DPD. To state that Policy H3 of the emerging Borough Plan will be amended purely to refer to Policies within the Gypsy and Traveller Site Allocations DPD.	The SA assessed the effects of the DPD, presuming this would largely supersede Policy H3. Therefore, the outcome for SA findings will be the same.
MM2	'3.0 Need/Future Need'/ Paragraph 3.9/ Page 7	Add text within paragraph to read: "3.9 In the 2021 GTAA it is recommended that the <i>"...evidence base is refreshed on a 5-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across Nuneaton and Bedworth."</i> This is an important element of confirming that the need in this DPD remains as required. <b><u>It is therefore the Council's intention that the number of</u></b>	To clearly set out what will be carried out at the AMR stage in order to encourage sites coming forwards and when the DPD will be reviewed.	Clarity is helpful to encourage up to date evidence of need. However, this is unlikely to significantly

		<p><b><u>new pitches will be assessed each year at the Authority Monitoring Report (AMR) stage and landowners contacted to encourage the sites to come forwards. The DPD will be reviewed five years after adoption and subsequently five years thereafter on an ongoing basis, to ensure the document meets the current needs.</u></b> The update of the GTAA is referenced in Table 3 of Chapter 5.0 on Monitoring of this document. Should need be found to have changed beyond that set out in this DPD (or indeed for another reason such as undeliverability of a site or sites) then this should trigger a review of this DPD.”</p>		alter findings. SA
MM3	Strategic ‘Policy GT1 – Overall Need’/ Page 8	<p>Add text at end of Policy to read:  “The following levels of development will be planned for and provided within Nuneaton and Bedworth Borough between 2021 and 2037:</p> <ul style="list-style-type: none"> <li>• At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025; and</li> <li>• At least a further 5 permanent residential pitches beyond those required by 2025 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2037.</li> </ul> <p><b><u>This Policy supersedes the third bullet point of Policy DS4 of the adopted Borough Plan (2011-31).”</u></b></p>	<p>To make clear that the numbers for pitches within the existing Borough Plan (2011-2031) and the period of cover.</p> <p>This modification is also necessary to clarify which section of the existing Local Plan is superseded by the DPD.</p>	The outcome is the same with regards to the SA findings, as only additional provision beyond the baseline position (i.e. that within the adopted Plan) was factored into the assessment of effects.
MM4	‘4.0 Location of Pitches’/ Under new sub section ‘Green Belt’/ Paragraph 4.3	<p>Delete whole paragraph as follows:  “4.3 <del>Notwithstanding the above, of all the occupied pitches, and plots on site/yards for gypsies and travellers all but one (that at Watling Street) are within the Green Belt</del></p>	Clarity of the position of the sites in relation to Green Belt Policy and to be consistent	Though the green belt status of the sites is not

	<p>and new paragraph 4.4/ Pages 9 and 10</p>	<p><del>including the local authority provision at Griff. The travelling showperson's yard is also outside of the Green Belt."</del></p> <p>Replace paragraph 4.3 to read:</p> <p><b><u>"4.3 Sunrise Cottage and The Old Nursery are not currently being considered for the removal of their Green Belt status. The removal of the two sites from the Green Belt would not be consistent with Policy DS7 of the current Borough Plan (and would be noncompliant with Regulation 8(4) of the 2012 Regulations) which is the Part 1 plan. Notwithstanding this, the Borough Plan is currently being reviewed and the Green Belt status of these two sites may be revisited, if necessary, when the Borough Plan is updated as part of a wider review of the Green Belt. However, the Site Assessments and the Green Belt document explains how the Green Belt sites may be considered suitable for development subject to meeting national policy for the Green Belt.</u></b></p> <p>Add complete new paragraph to read:</p> <p><b><u>"4.4 If future planning applications on these sites are considered to be inappropriate development in the Green Belt, then it would be necessary to demonstrate 'very special circumstances' in accordance with the Framework. In this regard, the allocation of these sites for new gypsy and traveller pitches in this DPD will be an important consideration in any such assessment."</u></b></p>	<p>with existing Borough Plan.</p>	<p>being changed, their allocation is still important in contributing to exceptional circumstances. It also ensures that the sites are not developed for other less suitable uses if they do not come forward as Gypsy and Traveller sites. This clarification is useful, but unlikely to significantly affect the SA findings.</p>
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MM5	'4.0 Location of Pitches'/ Now under new sub section 'Sustainability'/ Previously Paragraph 4.5 now 4.6/ Page 10	Amend and add to paragraph to read: "4.6 Sites should also avoid locations that would impact upon land that has been designated for its interest, so, sites of ecological, heritage, or geological value. Similarly, contaminated land, land prone to flooding, and land in a sensitive landscape should also be avoided. These and other criteria for selecting new gypsy and traveller sites are set out in Policy H3— <del>Gypsies and Travellers of the current Borough Plan.</del> <b><u>GT2 Strategy.</u></b> "	Reference to Policy H3 removed as to be superseded. Instead refers to Policies within DPD.	No implications for the SA findings.
MM6	'4.0 Location of Pitches'/ under sub section 'Locational Strategy'/ Previously Paragraph 4.6 now 4.7/ Page 10	Delete, add and amend some wording in paragraph as follows: "4.7 The fundamental purpose of the Gypsy and Traveller Site Allocations DPD is to allocate land to provide for the number of pitches identified <del>as the need by 2036/37.</del> <b><u>for the required need to 2037.</u></b> The Issues and Options consultation draft proposed four strategies for allocating new pitches. These were all assessed within the accompanying sustainability appraisal and two of the options were found to be the most sustainable, namely the following: A. Seek to allocate new pitches firstly within the permitted area of existing sites and/or adjacent to these sites, then based on walking distances to services, and then by existing Policy H3. D. Seek to allocate new pitches firstly within the permitted site area of existing sites, then adjacent to these existing pitches, then based on <del>walking distances to services. Use existing Policy H3 only once sites have been allocated by any of the other means and then only if insufficient has been allocated.</del> <b><u>the criteria set out in the latter part of the policy.</u></b> "	Make clear the cover period of the DPD. Remove reference to acceptability of walking distance as the location of the sites is unable to comply with this.	Relates to MM10, which is screened in.

MM7	'4.0 Location of Pitches'/ under sub section 'Locational Strategy'/Previously Paragraph 4.7 now 4.8/ Pages 10-11	Amend typing error from 'of' to "is". Delete one sentence to read: "4.8 Respondents to the issues and options selected only options A and D – with an even split of numbers to these two options from respondents. Options A and D – the first difference is that option A uses extant Policy H3 to assess sites at the outset whilst option D only uses extant Policy H3 once insufficient sites have been found via other means. The second difference if <u>is</u> that option D separates out the permitted areas of existing sites from land adjacent to existing sites whereas option A does not and treats them together. It is considered that option D should form the basis of the allocation of new pitches as it allows for the consideration of the permitted site area of existing sites first (and in isolation) and this has the potential for the least impact. However, in hindsight, the use of the word 'adjacent' could give rise to some ambiguity and the word 'adjoining' will be used instead to emphasise that there should be a physical relationship between the new and the existing. <del>Also, another benefit of using option D is that Policy H3 is only used as a fallback if insufficient pitches have been found via other means rather than from the outset.</del> It should be noted that should planning applications be made for new pitches on unallocated sites then the strategic policy in this DPD would be used as the starting point to assess their suitability."	To remove reference to the future use of Policy H3 of extant Borough Plan.	The criteria within H3 is now covered in the DPD itself, so the outcomes are unlikely to be significantly different compared to the baseline position.  Changes to strategy are covered under MM10.
MM8	'4.0 Location of Pitches'/ under sub section 'Locational	Delete whole paragraph as follows: "4.8 <del>In terms of walking distances to services a number of different ways in which this could be measured were suggested in the issues and options document and</del>	Remove reference to walking distance of sites to services to	Relates to MM10, which is screened in.



	Strategy'/ Previously Paragraph 4.8	these ranged from 2-3 miles for school to 800 metres to a town centre. The intermediate distance was 1.6 kilometres to GPs (General Practitioners) and pharmacies. Given the above range of different ways to measure walking distances to specific services and that, ideally, access should be all of these, it seems a good compromise to use the intermediate distance, and this shall be used within the strategic policy."	reflect revised policy wording	
MM9	'4.0 Location of Pitches'/under sub section 'Locational Strategy'/ Paragraph 4.9/ Page 11	Omit and amend wording to read: <del>"4.9 Based on the above the strategy is a tiered approach whereby land that is being developed for new pitches will be assessed against the three priority land uses. In terms of allocations, land will be allocated in the order set out in the policy so that the priority will be to allocate land that meets priority one in the first instance. If insufficient pitches to meet the Borough's needs are found to be acceptable then land use priority two will be used and then land use priority three. If insufficient remains allocated, then Policy H3 will be used. In terms of planning applications these are standalone parcels of land that cannot be dealt with by the same process and, thus, any of the three priority land uses would be acceptable subject to all other matters of the proposal being found acceptable. Policy H3 of the extant Borough Plan is only utilised if there is insufficient provision to meet the identified need for new pitches. <b>Policy GT2 identifies that new gypsy and traveller pitches will generally be supported within the sites allocated within GT3 or within the permitted area of existing lawful, authorised gypsy and traveller sites. In addition, to ensure that consideration is given to</b></del>	Deleted reference to H3 of the extant Borough Plan and to clarify the criteria in GT2 and GT3 is instead used for allocating acceptable sites.	Relates to MM10, which is screened in.

		<p><b><u>sustainability, any new sites that come forwards within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan). In addition, land adjoining the permitted area of existing lawful, authorised gypsy and traveller sites will be considered as long as these are in proportion appropriate to the scale of the existing site. The intention is to supersede entirely Policy H3 in the current adopted Plan (2011 – 2031). Within the emerging Borough Plan (2024 – 2039) emerging Policy H3 will simply signpost to the adopted DPD for guidance on any new pitches or plots.”</u></b></p>		
MM10	Strategic 'Policy GT2 Strategy'/ Pages 11 and 12	<p>Amend, omit, and add to read:  “Planning permission will be granted for new gypsy and traveller pitches subject to compliance with other policies of the development plan <b><u>and with national policy including in relation to Green Belt</u></b> in the following priority land uses <b><u>on the following land:</u></b></p> <p>a) <b><u>Sites allocated in Policy GT3</u></b> or within the permitted area of existing lawful, authorised gypsy and traveller sites; or</p> <p>b) <b><u>Sites within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan);</u></b> or</p> <p>c) <del>then land adjoining the permitted area of existing lawful, authorised gypsy and traveller sites;</del> d) <del>then land within 1.6 kilometres of appropriate services, such as schools, GP surgeries, shops, and these services being capable of being accessed safely by foot. <b><u>Extensions adjoining the permitted area of existing lawful,</u></b></del></p>	See note above. Instead of having to demonstrate the priority land uses all the criteria is equally acceptable. Thus, negating a staged approach to the criteria.	Screened in  The change increases flexibility of use, but takes away a sequential approach.

authorised gypsy and traveller sites that are proportionate in scale to the existing site.

Any proposed sites considered must comply with all of the following:

- a) The site should have reasonable access to essential services including health and education facilities and access to local shops;
- b) The number of pitches or plots is in proportion to the size and scale of the site;
- c) The number of pitches or plots is in proportion to the size and density of the nearest settled community;
- d) The site is not located in areas of high flood risk;
- e) The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets;
- f) The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected;
- g) The site has suitable access to the highway network;
- h) The site is located where air or noise pollution will not significantly affect the health and well-being of site residents; and
- i) The site has suitable connection to the foul sewage system or can demonstrate that connection is unviable and alternative arrangements can be made.

If there is insufficient provision to meet the minimum needs identified in Strategic Policy GT1 – Overall Need then extant

		<p>Policy H3—Gypsies and Travellers of the Borough Plan will be used to determine the acceptability of the new development.</p> <p><b><u>This Policy supersedes Policy H3 of the adopted Borough Plan (2011-31)."</u></b></p>		
MM11	<p>Supporting text under Strategic 'Policy GT2 Strategy'. Under subheading 'Allocation of Sites'/ Previously Paragraph 4.12 now 4.13/ Page 13</p>	<p>Sentences omitted at beginning of paragraph to read:</p> <p>"4.13 <del>This site does not meet the three bullet points of Strategic Policy GT2 Strategy but the policy allows for sites in other locations that accord with Policy H3 where the need set out in Strategic Policy GT1 Overall Need has not been met. The other two sites would provide nine pitches, leaving a shortfall of two pitches to meet the identified need. An assessment of the site against Policy H3 has concluded that the site would be acceptable for allocation.</del> The number of pitches provided by the three sites found acceptable for allocation would provide 14-15 pitches which would, firstly, meet the minimum 11 pitches required and, secondly, build in some resilience should the anticipated levels of turnover at The Griff not take place."</p>	<p>Removed reference to Policy H3 of Borough Plan so reference to this has been removed for clarity.</p>	<p>No implications for SA findings.</p>
MM12	<p>Supporting text under Strategic 'Policy GT2 Strategy'. under subheading 'Allocation of Sites'/ Previously Paragraph 4.15 now 4.16/ Page 13</p>	<p>Deleted sentences at end of paragraph to read:</p> <p>"4.16 The need for new gypsy and traveller pitches set out in Strategic Policy GT1 – Overall Need is for at least 11 permanent residential pitches to accommodate Gypsies and Travellers. The sites that have been found acceptable to allocate would provide up to 15 pitches at three locations and these are set out in Policy GT3 – Site Allocations. Below the policy an accompanying plan is provided showing the area to which the allocation relates." <del>Two of the sites are within the Green</del></p>	<p>Omitted the requirement to remove sites from the Green Belt as there is no intention of removing these sites within the extant Borough Plan which would have meant the</p>	<p>No implications for the SA findings.</p>

		<del>Belt, namely Sunrise Cottage and The Old Nursery, and these have been found to meet the terms of exceptions and thus allowable development in the Green Belt. The extant proposals map will need to be updated to remove these two sites from the Green Belt.</del>	DPD conflicted with the extant Local Plan.	
MM13	Strategic 'Policy GT3 – Site Allocations'/ Pages 15 and 16	<p>Additions to the Policy to read:</p> <p>“Planning permission will be granted for new gypsy and traveller pitches at the following sites and as denoted with a solid red line on the accompanying site plans:</p> <p>GTSA1 – Sunrise Cottage for three additional pitches within the existing site as shown as a solid red line on the accompanying plan.</p> <p>GTSA2 – The Old Nursery for five to six new pitches within the site as shown as a solid red line on the accompanying plan.</p> <p>GTSA3 - Winter Oak for six additional pitches within the existing site as shown as a solid red line on the accompanying plan.</p> <p><u>Key Development Requirements</u></p> <p>Planning applications at the allocated sites shall contain the details as set out below:</p> <p>GTSA1 – Sunrise Cottage</p> <ul style="list-style-type: none"> <li>• Provision of visibility splays of 160 metres.</li> </ul>	Added requirements that became apparent during the Publication consultation process.	Screened in  Additions to policy could potentially have implications for the SA findings.

		<ul style="list-style-type: none"> <li>• Suitable bin collection points should be provided within the site so that bins are not stored within the highway.</li> <li>• Preliminary Ecological Assessment.</li> <li>• <b><u>Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.</u></b></li> </ul> <p>GTSA2 – The Old Nursery</p> <ul style="list-style-type: none"> <li>• Closure of the northern access within the site.</li> <li>• Access to be made in and out of the site from the southern access within the site.</li> <li>• Configuration of an access that allows for sufficient manoeuvring room for any vehicles entering/exiting the site.</li> <li>• Any gates within the access to be setback sufficient distance to allow any vehicle entering the site to exit the highway completely whilst the gates are opened or closed.</li> <li>• Provision of visibility splays of 160 metres.</li> <li>• Suitable bin collection points should be provided within the site so that bins are not stored within the highway.</li> <li>• Landscaping of the site boundary to soften the appearance of the pitches from external views.</li> <li>• Preliminary Ecological Assessment.</li> <li>• Retention of existing boundary vegetation.</li> <li>• Provision of communal play area within the site.</li> </ul>		
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		<ul style="list-style-type: none"> <li>• <b><u>Address any contamination on the site.</u></b></li> <li>• <b><u>Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.</u></b></li> </ul> <p>GTSA3 – Winter Oak</p> <ul style="list-style-type: none"> <li>• Suitable bin collection points should be provided within the site so that bins are not stored within the highway.</li> <li>• Preliminary Ecological Assessment.</li> <li>• Retention of existing boundary vegetation.</li> <li>• <b><u>Provision of communal play area within the site.</u></b></li> <li>• <b><u>Ensure air and noise quality to future residents of the site is acceptable.</u></b></li> <li>• <b><u>Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water quality will need to be considered.”</u></b></li> </ul>		
MM14	Strategic ‘Policy GT4 – Site Safeguarding’/ Page 19	<p>Amend and omit some wording to read: “The travelling showpeople site at Spinney Lane/Whittleford Road, Nuneaton as denoted on plan GTSA4 with a solid red line will be safeguarded for use by travelling showpeople.</p> <p>Alternative uses will <b><u>only</u></b> be permitted if it is <b><u>clearly demonstrated</u></b> proven that either there is no longer a requirement <b><u>the site is no longer required</u></b> for travelling showpeople accommodation.” <del>or that an alternative site for travelling showpeople is available within Warwickshire.</del></p>	Reworded Policy in order to require demonstration if the site is no longer required and deleted reference to the removal of the protection in the event a new site is located in	No implications for SA findings.

				Warwickshire which is unlikely to happen.										
MM15	'5.0 Monitoring'/Table 3/ Page 21	Omit and amend some wording in the table to read: "Table 3 - Monitoring indicators and targets for the policies of the Gypsy and Traveller Site Allocations Development Plan Document (DPD).	<table border="1"> <thead> <tr> <th>Policy</th> <th>Indicator</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>Strategic Policy GT1 – Overall Need</td> <td><del>Gypsy and traveller accommodation.</del></td> <td><del>11 residential pitches Provided.</del></td> </tr> <tr> <td></td> <td>Monitor the continued need for additional pitches.</td> <td>Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.</td> </tr> </tbody> </table>	Policy	Indicator	Target	Strategic Policy GT1 – Overall Need	<del>Gypsy and traveller accommodation.</del>	<del>11 residential pitches Provided.</del>		Monitor the continued need for additional pitches.	Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.	Make clearer the monitoring process and requirement for a new Accommodation Assessment Survey to see if the number of pitches has changed and therefore requires amending. Amend wording to replicate the wording within Policy GT4.	No implications for SA findings.
Policy	Indicator	Target												
Strategic Policy GT1 – Overall Need	<del>Gypsy and traveller accommodation.</del>	<del>11 residential pitches Provided.</del>												
	Monitor the continued need for additional pitches.	Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.												



			Strategic Policy GT2 – Strategy	Sites permitted in accordance with the <u>policy criteria mentioned in policy GT2.</u>	100%. <b><u>Timescales as below.</u></b>		
			Policy GT3 – Site Allocations	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report. <b><u>Contact the proposed sites on a yearly basis after the AMR to encourage the sites to come forwards and answer any concerns the owners may have on bringing the sites forwards at that time</u></b>	A minimum of six additional residential pitches permitted and available for use by <del>2025/26</del> and a minimum of 11 additional residential pitches permitted and available by <del>2036/37</del> .		

			Policy GT4 – Site Safeguarding	Monitor the use of the safeguarded site.	The identified site at Spinney Lane/Whittleford Road, Nuneaton to remain used for travelling showpeople unless it <del>is was proven to be no longer required.</del> <b><u>clearly demonstrated that the site is no longer required for travelling showpeople accommodation</u></b>		
MM16	'Appendix 1'/Table/Page 22	Omit and amend some wording to read: "Relationship between the policies in this DPD and the extant Borough Plan.			To make clearer what is to be superseded in the extant Borough Plan when the DPD is adopted.		No implications for findings. SA
			<b><u>Superseded Existing</u></b> Borough Plan policies	<b><u>Superseding Effect of</u></b> Gypsy and Traveller Site Allocations DPD policies			
			Policy DS4 – Overall development needs (third bullet point only).	<b><u>Superseded by</u></b> Strategic Policy GT1 – Overall Need.			

		Policy H3 – Gypsies and Travellers. (figures contained in first sentence)	<b>Superseded</b> by Strategic Policy <del>GT1</del> Overall Need- <del>GT2</del> – Strategy” –.		
MM17	'Appendix 1'/ Supporting text to table / Page 22	Add to appendix to read: <b>“For reference Policy DS4 Overall development needs should now read:  <u>The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2011 and 2031:</u></b> <ul style="list-style-type: none"> <li>• <b><u>At least 14,060 homes</u></b></li> <li>• <b><u>At least 107.8 ha of employment land</u></b></li> <li>• <b><u>At least 39 residential pitches and 5 transit pitches to accommodate Gypsies and Travellers”</u></b></li> </ul>		To make clear that reference to pitches in third bullet point of Policy DS4 of the extant Borough Plan is to be deleted.	No implications for the SA findings. Meeting needs for gypsies and travellers is addressed through the DPD, and not reliant on DS4.

